

Planning and Development Regulation Legal Update

August 25, 2020



UNC
SCHOOL OF GOVERNMENT

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#9203262

CZO: 1.5 hours

- Introduction
- 160D Amendments (S.L. 2020-25)
- New Chapter 160D Resources
- COVID Bills
- Utility Provisions
- Farm Bill
- Case Update



Chapter 160D Developments

- 1) New Effective Date
- 2) 2019 Legislation Integrated
- 3) Modest Clarifications and Technical Corrections

Chapter 160D -- Original Effective Date

- Effective date of Jan. 1, 2020
- General Statutes Commission directed to study and report to 2020 General Assembly legislation to make necessary adjustments prior to effective date:
 - Integrate Part I into Part II
 - Incorporate other 2019 amendments to affected statutes
 - Make other technical, clarifying, corrective amendments
- Allow time for cities and counties to make conforming ordinance amendments

Chapter 160D -- Effective Date

If GSC bill not adopted, Ch. 160D is effective 1/1/20 without other 2019 amendments being incorporated, so . . .

COVID Stop-gap/Insurance Bill

S.L. 2020-3 (S. 704) enacted on May 4, 2020

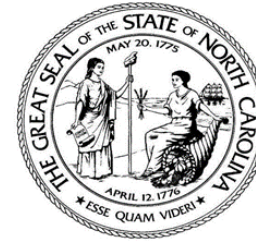
- 1) Delayed Ch. 160D effective date to 8/1/21 to allow time for adoption of GSC bill in 2021 session
- 2) Authorize immediate use of incorporation of state/federal maps by reference (not codified)
- 3) Understanding that change in effective date would be repealed if GSC bill adopted in 2020

Chapter 160D -- Effective Date

General Statutes Commission

- Final report and bill approved in May
- Implementing bill: S. 720
- Enacted:

**S.L. 2020-25,
effective June 19, 2020**



GENERAL STATUTES COMMISSION

REPORT TO THE
2020 REGULAR SESSION
of the
2019 GENERAL ASSEMBLY
OF NORTH CAROLINA
ON
INCORPORATING LAND-USE LAWS ADOPTED IN 2019
INTO CHAPTER 160D OF THE GENERAL STATUTES AS
REQUIRED BY S.L. 2019-111

MAY 7, 2020

Chapter 160D -- New Effective Date

- Repeals delay created in COVID stopgap bill
- Makes Ch. 160D effective immediately – June 19, 2020
- BUT adds six months for local conforming amendments
 - Can be done now, but must be done by 7/1/21
 - 160D not applicable in individual city or county until that is done
- No change in date for having an adopted plan to retain zoning authority (7/1/22)

Chapter 160D -- Effective Date

Practical Effect

For an individual city or county,

Ch. 160D becomes fully effective (and Ch. 153A/160A provisions repealed) when:

- (1) it updates its development regulations **OR**
- (2) on July 1, 2021

Whichever happens first

Chapter 160D -- Integrates 2019 Legislation

Integrates Part I of original 2019 bill into Part II (160D)

Part I amendments to Ch. 153A/160A became effective in July 2019. Adds these to appropriate 160D provisions

- No third party down-zoning
- Limits conditions on conditional zoning/SUPs
- Permit choice amendments in GS 143-755 -- permits on hold, appeals, definitions
- Vested rights refinements – rewrite of 160D-108 (multiple permits, process to claim), add 160D-108.1 for site-specific vesting plans
- Judicial review – limit estoppel claims, attorney fees, direct appeal of some claims

https://www.sog.unc.edu/sites/www.sog.unc.edu/files/reports/20190500_PZ_LB28_v8.pdf

Chapter 160D -- Integrates 2019 Legislation

Also integrates other 2019 enacted legislation

- H. 675 – No regulation of minimum house size in zoning or subdivision regs, limit on mandates for burial of existing power lines, building code amendments
- H. 131 – Official map act repeal
- S. 313 – Clarify performance guarantees relative to improvements required in plat approvals

Chapter 160D -- Clarifications

- Allow LUP as well as comprehensive plan to qualify for the plan required to retain zoning authority
- City zoning must be citywide, county partial zoning still allowed (but no 640-acre minimum)
- Local permit approvals may last longer than one year
- Specify type of hearings required – legislative, quasi-judicial, or administrative

Chapter 160D -- Clarifications

Reinsert inadvertently omitted statutes

- County receive funds for streets in ETJ
- Receivership for dilapidated houses
- 10 year enforcement for nonconformities
- No restrictive covenants for family care homes

Correct cross-references

More language clean-up (less legalese)

Chapter 160D -- Clarifications

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Chapter 160D

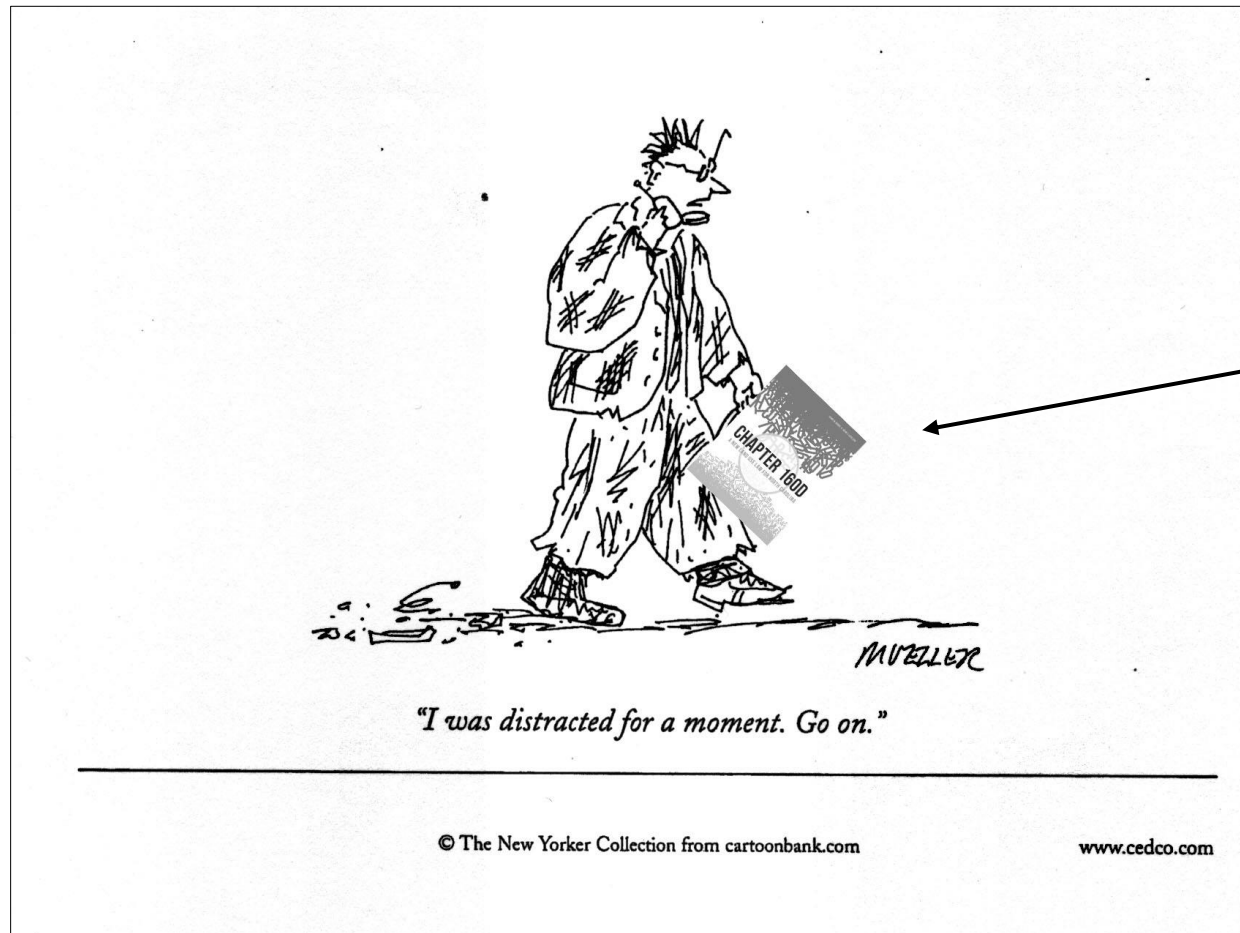
2020 updates now included in SOG web page

- Chapter 160D text with 2020 amendments incorporated
- Updates charts
 - 160D to 160A/153A
 - 160A/153A to 160D

- Introduction
- SL 2020-25
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Planning in a Pandemic



Just Getting Started?

Adoption

Introduced in 2015
Introduced in 2016
Introduced in 2017

Enacted as Part of the 2017 Session (S.L. 2017-0355)

CHAPTER 160D
A NEW LAND USE LAW FOR NORTH CAROLINA
ONLINE MODULE SERIES



Intro Video Modules


Structure and Elements

Adam Lovelady

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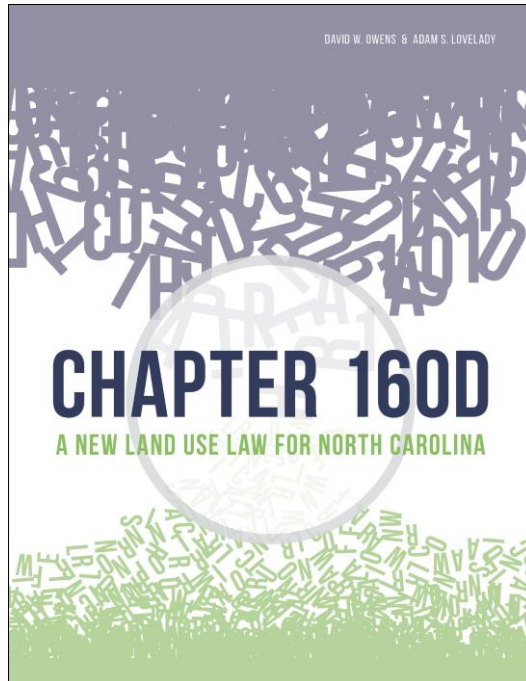
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CHAPTER 160D
A NEW LAND USE LAW FOR NORTH CAROLINA

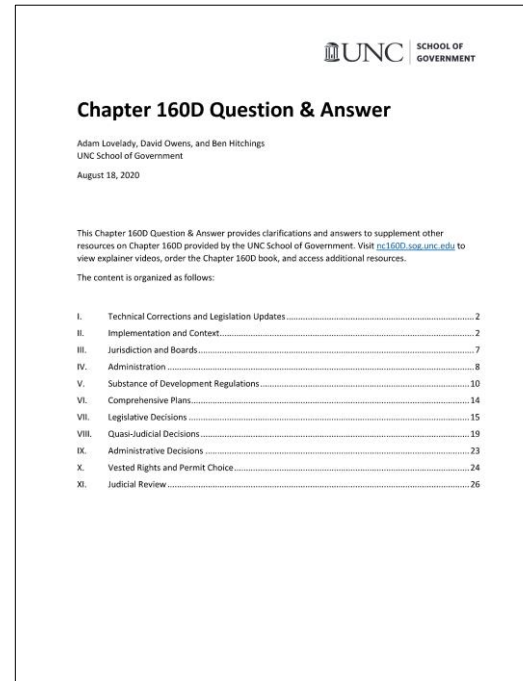


Jumpstart Workshop

Digging into the Details?



Book

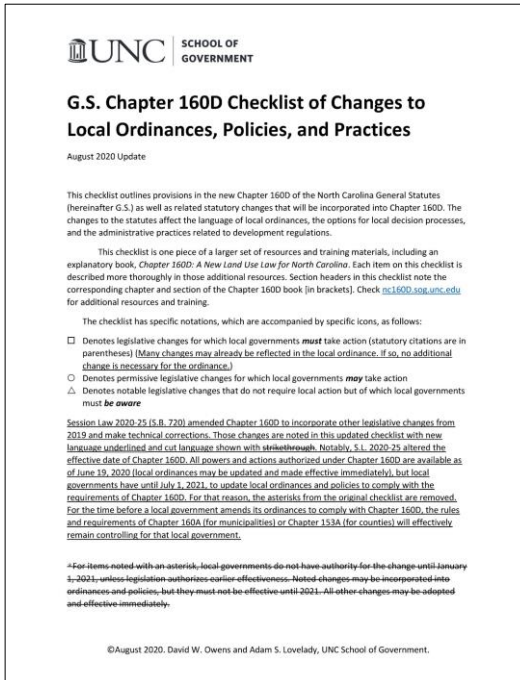


Q&A

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ARTICLE 1 <i>Definitions and Statutory Construction (most also retained in 160A-153.4)</i>	ARTICLE 1	
§ 160A-1. Application and meaning of terms.	153A-1	160D-102
§ 160A-2. Effect upon prior laws.	153A-2	160D-111
§ 160A-3. General laws supplementary to charters.	153A-3	160D-102, 111
§ 160A-4. Broad construction.	153A-4	160D-110
§ 160A-4.1. Notice of new fees and fee increases; public comment period.	—	160D-800
§ 160A-5. Statutory references deemed amended to conform to Chapter 160D.	153A-5	160D-111
ARTICLE 19 <i>Planning and Regulation of Development</i>	ARTICLE 19	
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§ 160A-360. Territorial jurisdiction.	153A-320	160D-200, 202, 903
§ 160A-360.1. Permit choice.	—	160D-108(b)
§ 160A-361. Planning boards.	153A-321	160D-301
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§ 160A-363. Supplemental powers.	153A-322	160D-102, 103, 106, 302
§ 160A-364. Procedure for adopting, amending, or repealing ordinances under Article.	153A-323	160D-601
§ 160A-364.1. Statute of limitations.	153A-348	160D-1405
§ 160A-365. Enforcement of ordinances.	153A-324	160D-106, -404(c)
§ 160A-366. Validation of ordinance.	—	160D-111
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§ 160A-373. Ordinance to contain procedure for plat approval; approval prerequisite to plat recordation; statement by owner.	153A-332	160D-803
§ 160A-374. Effect of plat approval on dedications.	153A-333	160D-806
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§ 160A-376. Definition.	153A-335	160D-802

Crossover
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Drafting Ordinance Updates?

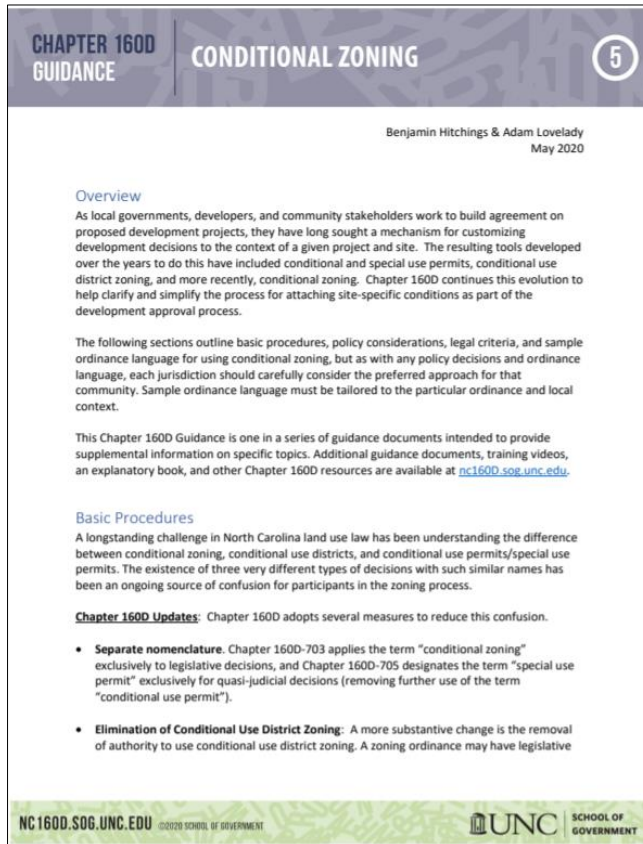


Checklist



Office Hours

160D Guidance Documents

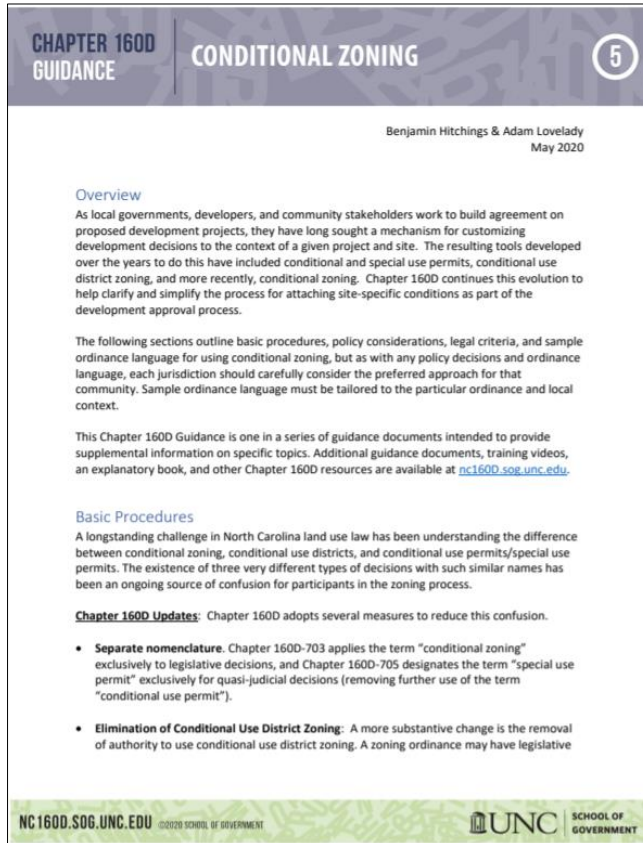


1. Administrative Modifications
2. Incorporating Maps by Reference
3. Conflicts of Interest
4. Plan Consistency Statements
5. Conditional Zoning
6. Permit Choice
7. Vested Rights


160D Guidance Documents

Sections:


1. Overview
2. Basic Procedures
3. Key Considerations
4. Statutory Authorization
5. Sample Ordinance Language
6. Example Ordinance Provisions



Need a Code Scan?



For Baldwin, Williams, New Hope, Cape Fear, and portions of Haw River, Oakland, Center, Albright, Gulf, Hickory Mountain, Matthews, and Hadley Townships



CD-CC Compact Community – a compact residential development with a mixed commercial use village center. See the Compact Communities Ordinance for more information.

CD-MU Mixed Use – a mixed use development that provides for an integration of diverse but compatible uses into a single development.

5.3. General Requirements

Property may be rezoned to a conditional zoning district only in response to and consistent with an application submitted in compliance with Section 5.

A. Application

Rezoning to a conditional zoning district shall only be considered upon request of the property owner or the authorized agent of the owner. Property may be placed in a conditional zoning district only in response to a petition by the owners of all the property to be included. Specific conditions applicable to the district may be proposed by the petitioner or the county, but only those conditions approved by the county and consented to by the petitioner in writing may be incorporated into the zoning regulations or permit requirements. In addition to the documents specified in **Subsection B** below, all applications shall also contain the following information:

1. The alleged error in this Ordinance, if any, which would be remedied by the proposed amendment with a detailed explanation of such error in the Ordinance and detailed reasons how the proposed amendment will correct the same.
2. The changed or changing conditions, if any, of the area or in the County generally, which make the proposed amendment reasonably necessary to the promotion of the public health, safety and general welfare.
3. The manner in which the proposed amendment will carry out the intent and purpose of any adopted plans or part thereof.

Chatham County Zoning Ordinance

b. Existing and general proposed topography;
c. Scale of buildings relative to abutting property;
d. Height of structures;
e. Exterior features of the proposed development;
f. A traffic impact analysis of the proposed development prepared by a qualified professional. The traffic impact analysis shall follow the NCDOT TIA Analysis Guidelines, and shall also include consideration for non-motorized and public transportation;
g. Any other information needed to demonstrate compliance with these regulations.

(4) The site plan and any supporting text shall constitute part of the application for all purposes under this section.

5.4. Uses Within District

Within a conditional zoning district, only those uses listed (or determined to be equivalent uses) as permitted uses or conditional uses in the corresponding zoning district shall be permitted, and no use shall be permitted except as a conditional use subject to approval of a conditional zoning district rezoning authorized by the Board of Commissioners as provided herein.

5.5. Conditions

Specified conditions may be proposed by the petitioner or the local government or its agencies, but only those conditions mutually approved by the local government and the petitioner may be incorporated into the zoning regulations. Conditions and site-specific standards imposed in a conditional district shall be limited to those that address the conformance of the development and use of the site to local government ordinances, plans adopted pursuant to G.S. 160D-5-1, or the impacts reasonably expected to be generated by the development or use of the site.

In approving a reclassification of property to a conditional zoning district, the Planning Department and Planning Board may recommend, and the Board of Commissioners request, that reasonable and appropriate conditions be attached to approval of the rezoning. Any such conditions should relate to the relationship of the proposed use to surrounding property, proposed support facilities such as parking areas and driveways, pedestrian and vehicular circulation, screening and buffer areas, the timing of development, street and right-of-way improvements, water and sewer improvements, stormwater drainage, the provision of open space, and other matters that the Board of Commissioners may find appropriate or the applicant may propose. Such conditions to approval of the rezoning may include dedication to the County or State, as appropriate, of any rights-of-way or easements for roads, water, or other public utilities necessary to serve the proposed development. The applicant shall have a reasonable opportunity to consider and respond to any such conditions prior to final action by the Board of Commissioners.

Ben Hinchings
This also comes under applicant consent to conditional, non-enforceability.

Ben Hinchings
It may be clearer language on road below titled "On the requirements one place."

Ben Hinchings
This restriction of the applicable statutory language may very well be an introduction to this section. The existing ordinance language could then serve as additional guidance or procedures and considerations.

Page 8

To learn more, email Ben Hinchings at hinchings@sog.unc.edu

SOG 160D Website

160D.sog.unc.edu

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COVID-19 Bills and Local Development Regulations

- Chapter 160D Extension
- Maps Incorporated by Reference
- Permit Extension
- Zoning Hearings

Permit Extension

SL 2020-3 (SB 704), Sec. 4.40

Five-month extension qualifying development approvals

Qualifying Development Approvals

- valid at some point between March 10, 2020 and April 28, 2020
- Types
 - erosion and sedimentation control plans;
 - building permits;
 - sketch plans, preliminary plats, or final plats;
 - site-specific development plans or phased development plans;
 - development permits;
 - development agreements; and
 - certificates of appropriateness.

Obligations of Approval Holder

- Comply with all applicable laws, regulations, and policies in effect at the time of the development approval
- Maintain all performance guarantees for the duration of the extension or until affirmatively released
- Complete any infrastructure necessary to obtain a certificate of occupancy or other final development approval

Termination and Appeal

- Local gov may terminate approval for failure to comply with terms of extension
- Written notice of reason for termination
- Appealed to board of adjustment

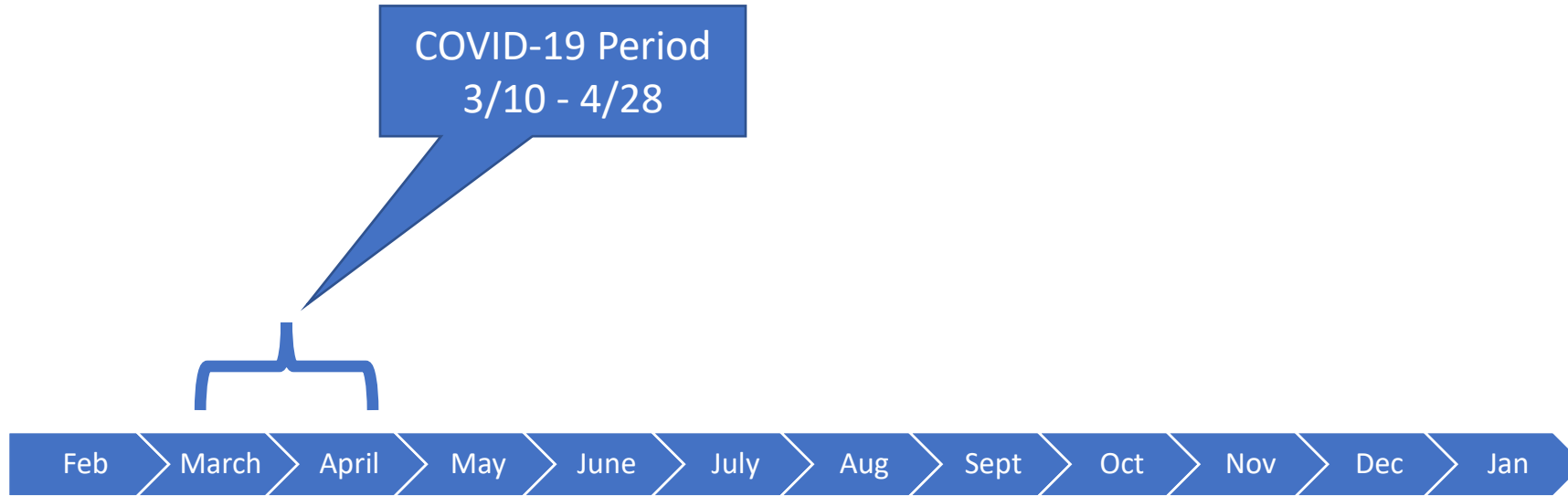
Exclusions

- Extend a permit from the federal government nor a permit for which the duration is set by federal law
- Shorten any development approvals
- Prohibit extensions of development approvals
- Affect Department of Environmental Quality administrative consent orders between the May 4 and September 28, 2020
- Prevent agencies from revoking or modifying a development approval
- Modify requirements necessary to retain federal delegation
- Modify obligations or rights under contract, including bond obligations or rights
- Authorize charging water or wastewater tap fees that have previously been paid in full.

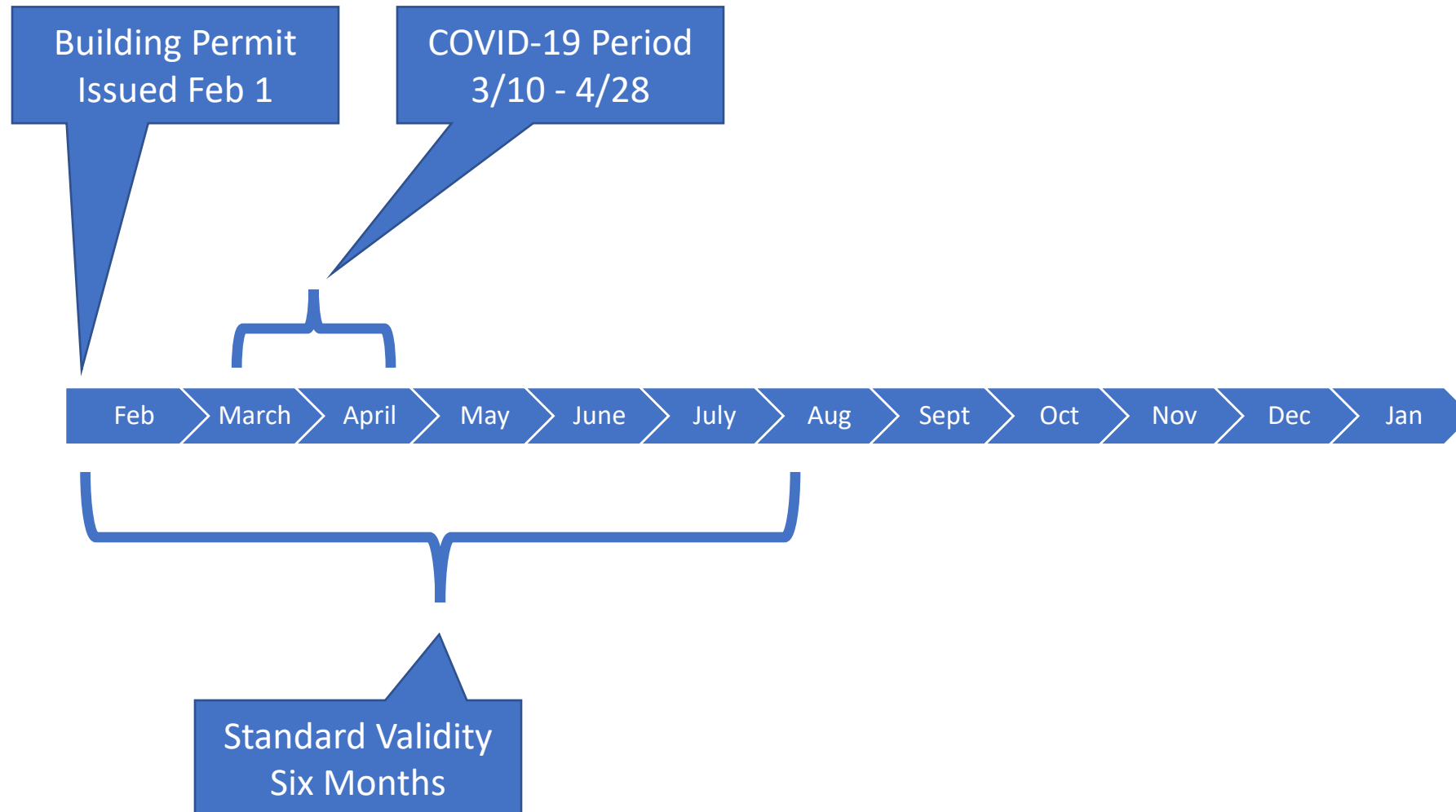
Expiration?

- Section 4.40(g) states that the approval extension law expires September 28, 2020

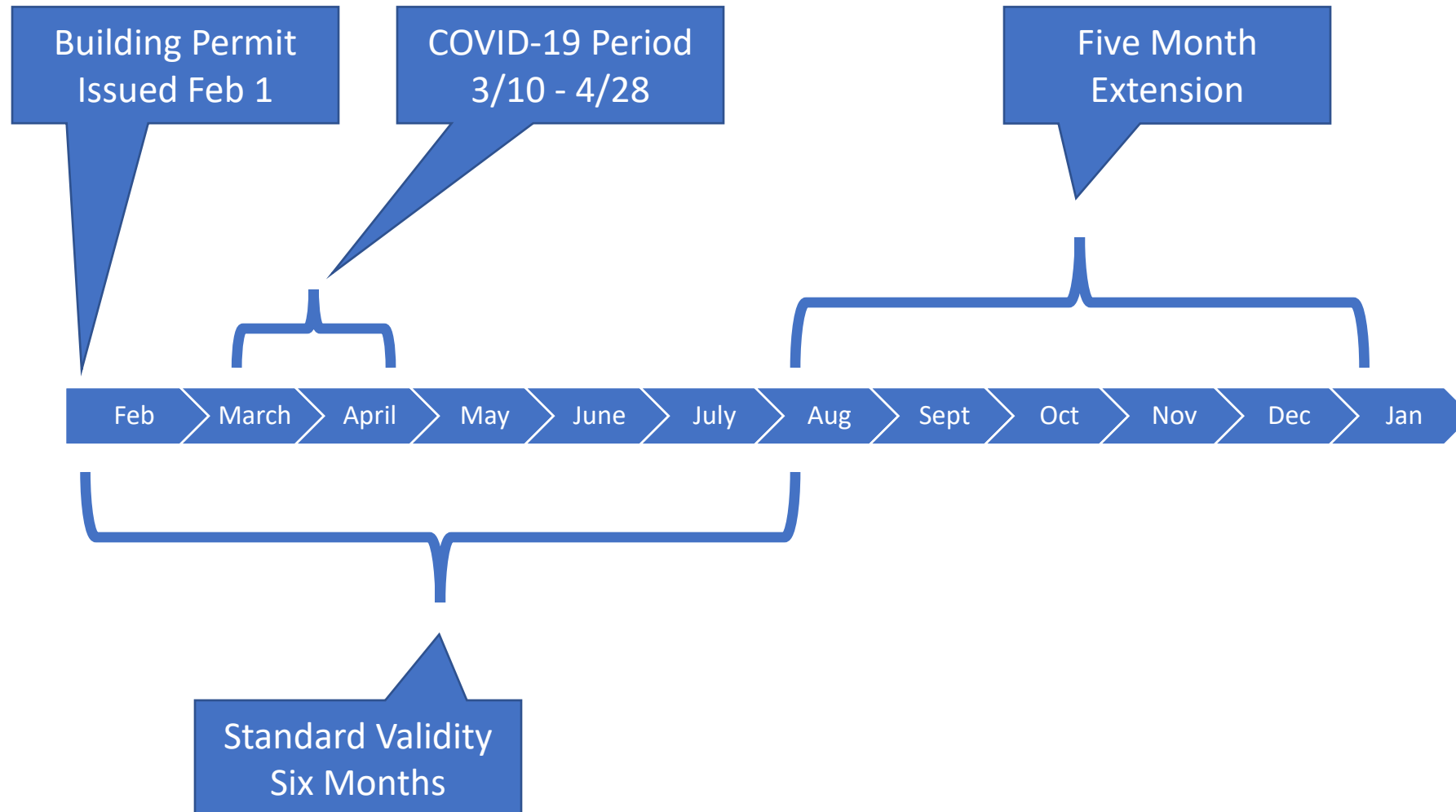
Sample Permit Extension



Sample Permit Extension



Sample Permit Extension



Remote Zoning Hearings during Declared Emergency

Remote Zoning Hearings during Declared Emergency

- SL 2020-3 (SB 704), Section 4.31(a), creating G.S. 166A-19.24
- Public Hearings
 - Zoning Amendment
 - Rezoning
- Quasi-Judicial Evidentiary Hearings
 - Special Use Permits
 - Variances
 - Appeals of Staff Decisions
 - Certificates of Appropriateness

Remote Zoning Public Hearings

- must allow written comments on the subject of the public hearing to be submitted between publication of notice and 24 hours after the public hearing

Remote Quasi-Judicial Evidentiary Hearings

Three conditions required:

- The right of an individual to a hearing and decision occur during the emergency.
- All persons with standing have notice and consent to the remote meeting.
- All due process rights of the parties affected are protected.

Right of an individual to a hearing and decision occur during the emergency.

- under normal circumstances, the hearing would have occurred during the time of the declared emergency

All persons with standing have notice and consent to the remote meeting.

G.S. 160A-393 on who has standing

- the applicant
- owner
- local government (if decision being appealed)
- individual who will suffer special damages (or association)

Challenge of identifying and obtaining consent

All due process rights of the parties affected are protected.

Rights include, among other things, right to

- Present evidence
- Object to opposing evidence
- Cross-examine witnesses
- Challenge the impartiality of the decision-maker

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System Development Fees – Time of Collection

- S.L. 2020-61 (H.B. 873)
- Was collected at time the local government committed water or sewer service or at the time of plat recordation
- New provision allows fee to be collected at the time of application for a building permit rather than plat recordation
- May require coordination between permitting authorities (proof of payment before building permits)

System Development Fees – Use of Funds

- S.L. 2020-61
- In certain circumstances, fees may be used toward previously completed capital improvements and toward capital rehabilitation projects

Sewer Lines for Accessory Dwellings

- S.L. 2020-61 (H.B. 873)
- If principal sewer line is permitted according to certain standards, then the shared sewer connection is deemed permitted without additional application or fee
- Environmental Management Commission to adopt rules consistent with statute

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2020 Farm Bill

S.L. 2020-18 (S. 315)

Adds hunting, fishing, and equestrian activities to “agritourism” that is exempt from county zoning

Does not add shooting ranges, as was included in 2019 version of the Farm Bill

Cannot require permit to provide catering services if catering business is on bona fide farm

Farm sign can be 3' x 3', on any property owned or leased by owner or lessee of the farm

Regulatory Reform Bill

S.L. 2020-74 (H. 308)

Adds Farm Bill amendments to Ch. 153A to Ch. 160D

Does not include provisions in 2019 version of bill on zoning of temporary event venues, manufactured home set-up, or aquaculture in flood hazard areas

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Quasi-Judicial Special Use Permit

PHG Asheville, LLC v. City of Asheville

SUP Request



Special use permit for hotel and parking structure in downtown

185 rooms

200-space adjacent parking deck

SUP Request

- Evidentiary hearing included five witnesses, including three experts, who testified in support of the application
- No evidence offered in opposition
- Technical Review Committee, Downtown Commission, and Planning and Zoning Commission all recommended approval
- City council denied the CUP, finding that the developer failed to produce competent, material, and substantial evidence to meet the standards

Standard of Review

de novo review to the question of whether the developer presented competent, material, and substantial evidence to establish a *prima facie* case

Issue is sufficiency of the evidence presented – burden of production to establish *prima facie* entitlement

Board Member Concerns

What if board members have doubts about the validity of expert testimony?

- Questions about methodology used?
- Concern about factors not addressed in study?
- Desire to see additional factors and data considered?
- Concern about credibility of expert witness?

Board Member Concerns

Expert testimony can only be rebutted by competent, material, and substantial evidence to the contrary

Board can consider member's knowledge of facts, but they must be relevant to the standards in the ordinance

Traffic

Questions from lay board member about methodology

- Days of week, month chosen for traffic counts

- Queuing at nearby intersections

- Impact of hill on sight lines

Issues not within the scope of ordinance standards cannot be basis for denial – factors to consider, data/analysis required

Where the TIA prepared in accordance with professional standards, it cannot be rebutted by lay opinions of board

Property Values

Board questions/concerns:

Impacts of other recently completed/planned hotels

Where the appraisal report was prepared in accordance with professional standards and directly addressed the applicable standard, it cannot be rebutted by lay opinions of board

Harmony

When a use is allowed as a conditional use that is the equivalent to a legislative finding that the use is in harmony with the area.
(*Woodhouse*)

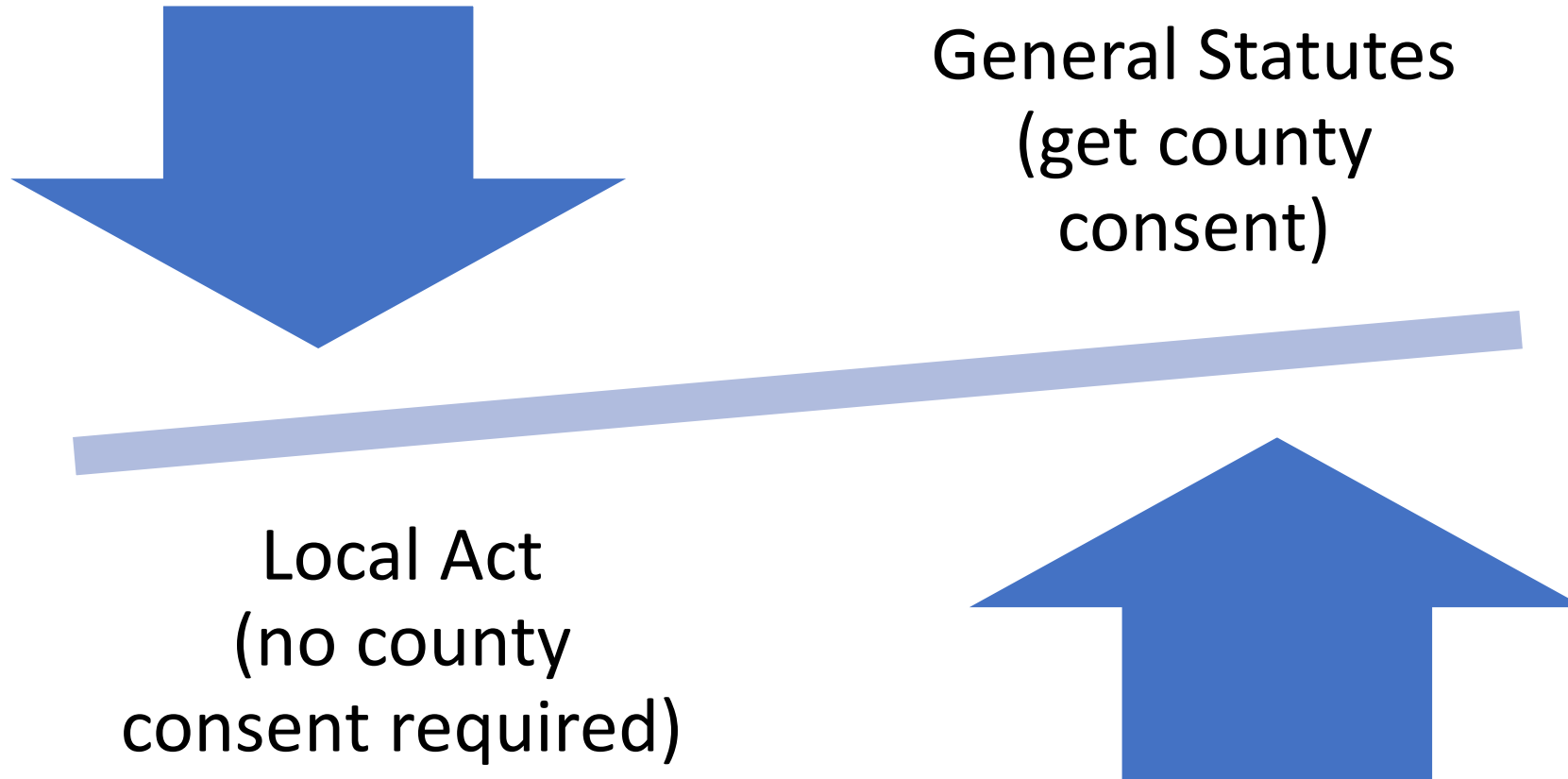
Result

For SUP, if applicant presents competent, material, and substantial evidence that all of the standards are met, they are entitled to approval

Must have contrary credible evidence to the contrary in order to deny.
Board member misgivings, doubts, concerns are inadequate to support a denial

Town of Pinebluff v. Moore County

ETJ Rules



Court of Appeals

- Irreconcilable conflict
- More recent legislation controls

NC Supreme Court

- “we disfavor any interpretation that repeals by implication another portion of the statute”
- local provision must still be read in context with the other requirements for ETJ

Starlites Tech Corporation v. Rockingham County

Timeline

- MM&K obtains zoning permit
(Starlites names as applicant and occupant)
- New ordinance restrictions adopted
- MM&K transfers ownership to Starlites
- Complaints and notice of violation against Starlites

Is it a nonconforming use?

- “[a] lot, structure or land use that is inconsistent with current zoning requirements, but which was entirely lawful when it was originally established.”
- “When any nonconforming use of a structure is discontinued for a period of one year, any future use of the structure shall be limited to those uses permitted in that district under the provisions of this ordinance. Vacancy and/or non-use of the building, regardless of the intent of the owner or tenant, shall constitute discontinuance under this provision.”
- Change in ownership is not change in use (Graham Court Associates v. Chapel Hill)

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