



Department of Planning and Zoning
Town of Vienna
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STAFF REPORT ADDENDUM

Meeting Date: February 11, 2026

To: Planning Commission

From: Kelly O'Brien, Deputy Director

RE: Continuation of Discussion on Green Hedges School's Applications for a Conditional Use Permit and Modification of Site Plan Requirements

THIS MEMORANDUM IS AN ADDENDUM TO THE STAFF REPORT FOR THE JANUARY 14, 2026, PLANNING COMMISSION MEETING AND THE ADDENDUM PREPARED FOR THE JANUARY 28, 2026, PLANNING COMMISSION MEETING.

Background and Purpose of This Addendum

The Planning Commission has previously reviewed Green Hedges School's applications for an amendment to its existing Conditional Use Permit (CUP) and related Modifications of Site Plan Requirements at its meetings on January 14 and January 28, 2026. At those meetings, staff presented a comprehensive analysis of the proposal, and the Commission provided direction regarding areas requiring additional clarification, refinement, and potential conditions of approval.

This memorandum serves as a focused addendum to the January 14, 2026 staff report and the January 28, 2026 addendum. It is intended to address specific issues raised by the Planning Commission, summarize new or revised information received since the January 28 meeting, and highlight potential condition refinements for Commission consideration. Unless expressly modified herein, the analysis and findings contained in the prior staff reports remain applicable.

Continuation of Discussion on Green Hedges School's Applications for a Conditional Use Permit and Modification of Site Plan Requirements

Recap of January 28, 2026, Planning Commission Meeting

At the January 28, 2026, Planning Commission meeting, the Commission continued its review of Green Hedges School's applications for 1) an amendment to its existing Conditional Use Permit (CUP), and 2) modifications of site plan requirements.

For that meeting the applicant presented revised materials, in response to feedback from the January 14 meeting, including:

- A reduction in the proposed maximum enrollment from 225 to 217 students (current cap: 190).
- Expanded vegetated buffers, in which the proposed plan would meet the 15-foot code requirement along approximately 90 percent of the property perimeter, with limited deviations due to existing site constraints.
- Reconfigured parking and athletic field areas to accommodate increased buffering.
- Proposed installation of acoustic fencing along play areas, to mitigate noise impacts.
- Clarification of school hours, camp operations, gym use, rentals, and special events.
- Phasing language tying construction timing to enrollment increases.

Commission discussion on January 28th focused primarily on the following themes:

- **Noise Impacts:**
Commissioners expressed significant concern regarding existing and ongoing noise impacts on adjacent residential properties, and the potential for increased noise if there were an increase in the number of students. While acknowledging that the proposed acoustic fencing and enhanced buffering would help to mitigate the noise, several Commissioners indicated that additional assurance was needed that the proposed measures would result in meaningful and enforceable noise mitigation over time.
- **Buffers and Site Design:**
Commissioners recognized that there were improvements to buffer widths compared to earlier submissions but raised questions regarding vegetation type, density, year-round effectiveness, and the proximity of outdoor activity areas to residential property lines.
- **Enrollment Increase and Intensity of Use:**
Commissioners questioned whether the site could reasonably accommodate an increase in enrollment, even with proposed mitigation measures. Several Commissioners emphasized concerns about cumulative impacts over time and suggested that modernization of facilities be considered separately from enrollment increases, or that enrollment increases occur only after mitigation measures are implemented and evaluated.
- **Phasing and Conditions:**
Discussion centered on whether approvals, if recommended, should include

Continuation of Discussion on Green Hedges School’s Applications for a Conditional Use Permit and Modification of Site Plan Requirements

phased implementation with checkpoints or reevaluation prior to allowing enrollment increases or subsequent construction phases.

- **Gym Use and Rentals:**

Commissioners expressed concern about potential impacts from expanded gym rentals, particularly athletic leagues, and indicated a preference for clearly defined limitations to protect adjacent neighborhoods.

The Planning Commission did not reach consensus on the applications on January 28th and agreed to defer action to allow staff, in coordination with and independent of, the applicant, to develop refined draft conditions and options reflecting the issues raised, for further consideration at the February 11, 2026, meeting.

The applicant agreed to defer the Board of Zoning Appeals hearing to March 2026 to allow additional time for Planning Commission review.

Attachments to This Addendum

This addendum includes only materials that are new or revised since the January 28, 2026 Planning Commission meeting. Prior attachments from the January 14 and January 28 staff reports are not reattached to avoid duplication and unnecessary volume.

Updated Applicant Submittals

The applicant submitted revised materials on February 4, 2026, some with staff requested edits on February 6, 2026, intended to respond to issues raised by the Commission, particularly related to enrollment, buffering, noise mitigation, rentals, and enforceability of conditions. The updated submittal includes the following attachments:

- **Attachment 02:** *Applicant’s Letter to Planning Commission 02.04.26*
- **Attachment 03:** *Applicant Clean CUP Conditions 02.06.26*
- **Attachment 04:** *Applicant’s Buffer Planting Narrative 02.04.26*
- **Attachment 05:** *Applicant’s Revised Modifications Request Letter 02.06.26*

Key changes from previous submittals include:

- A further reduction in the proposed maximum enrollment from 217 to 210 students, either as a fixed cap or as a five-year rolling average.
- Phased enrollment increases tied to specific implementation measures, including issuance of an Occupancy Permit for the new academic building, installation of sound isolation fencing, and installation of additional buffer vegetation.

Continuation of Discussion on Green Hedges School's Applications for a Conditional Use Permit and Modification of Site Plan Requirements

- A commitment to install sound isolation fencing adjacent to outdoor play areas prior to commencement of Phase 1 construction.
- Phased installation of required buffer in Phase 1, with deferral of installation in locations where stormwater infrastructure must be installed in Phase 2 (approximately 104 linear feet adjacent to 434 Knoll Street).
- Proposed mitigation measures in deferred buffer area, including supplemental shrub planting to discourage activity adjacent to neighboring residential properties.

Additional Attachments

In addition to the updated materials submitted by the applicant, staff have included the following attachments:

- **Attachment 06:** *Optional CUP Conditions with no Enrollment Increase*

During the January 28, 2026, Planning Commission meeting, Commissioners expressed the potential for amending the CUP to reflect the proposed improvements to the campus without increasing the enrollment. This is a version of the applicant's conditions of approval with no increase to enrollment or staff for the Planning Commission to consider.

- **Attachment 07:** *Written Testimony Received from 01.28.26 to 02.04.26 at 4 pm*

At the end of the January 28, 2026, Planning Commission discussion on this application, the Commission set a deadline for additional written testimony to be accepted for the packet by no later than 4 pm on Wednesday, February 4, 2026. This attachment includes correspondence received between January 28th and the deadline.

- **Attachment 08:** *Staff Presentation*

The staff presentation includes proposed motions for 1) recommendation to the Town Council on the requested Modifications of Requirements and 2) recommendation to the Board of Zoning Appeals on the Conditional Use Permit.



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STAFF REPORT ADDENDUM

Meeting Date: January 28, 2026

To: Planning Commission

From: Lyndsey Clouatre, Principal Planner

RE: Continuation of Discussion on Green Hedges School's Applications for a Conditional Use Permit and Modification of Site Plan Requirements

THIS MEMORANDUM IS AN ADDENDUM TO THE STAFF REPORT (ATTACHMENT 1) FOR THE JANUARY 14, 2026, PLANNING COMMISSION MEETING.

Recap of January 14, 2026, Planning Commission Meeting

At the January 14, 2026, Planning Commission meeting, staff presented Green Hedges School's applications for a Conditional Use Permit and Modification of Site Plan Requirements. Green Hedges School representatives then presented its overview of the proposal to enlarge the school's physical campus and enrollment and discussed means of addressing concerns expressed by neighbors. Such concerns included noise, buffering, and traffic impacts. The Planning Commission then opened the floor for public comments, wherein 20 speakers testified regarding the school's proposal.

Following questions and discussion with staff and Green Hedges School representatives regarding elements of the applications and neighbors' continued concerns, the Planning Commission decided to defer action on its recommendations to the Board of Zoning Appeals regarding the Conditional Use Permit and to Town Council regarding the Modification of Site Plan Requirements until the January 28, 2026, meeting. One purpose of the deferral was to allow additional time for data collection and analysis.

To support continued discussion at the January 28 meeting, members of the Planning Commission requested additional information from staff. The requested materials, along

Continuation of Discussion on Green Hedges School's Applications for a Conditional Use Permit and Modification of Site Plan Requirements

with presentations from the January 14 meeting and additional public comments received after that meeting have been included as supplemental attachments, as detailed below:

- **Attachment 15:** Staff's presentation from January 14, 2026 Planning Commission meeting
- **Attachment 16:** Green Hedges School's presentation from January 14, 2026, Planning Commission meeting
- **Attachment 17:** Currently active approved uses and conditions (the current CUP provisions)
- **Attachment 18:** Raw data files for Green Hedges School's vehicular arrivals and departure
- **Attachment 19:** Trip generation memo from the proposed (now withdrawn) redevelopment of the property at 128 Nutley Street NW. (Additional data was requested by a Planning Commissioner, but this material is all that staff has in our possession.)
- **Attachment 20:** Detailed reasoning from DPW staff for the addition and location of the staff-proposed mid-block crosswalk on Nutley Street NW
- **Attachment 21:** Raw data files for the noise analysis conducted by Green Hedges School
- **Attachment 22:** Additional comments received from members of the public regarding the applications from January 15 through January 23, 2026

Conditions to Consider

Based on public testimony, staff's and Green Hedges School's presentations, and the Planning Commission's questions and comments, staff suggest that the Planning Commission consider recommending the following underlined conditions to the Board of Zoning Appeals, in addition to other condition suggestions covered in page 13 of the original staff report:

1. Requiring sound-attenuating fencing or other effective noise mitigation measures along the property boundaries, especially when adjacent to homes.
A common theme amongst testimony opposing growth at Green Hedges School is noise generated by students during recess and breaks. While Green Hedges School has proposed increasing the current buffer in some locations between the property

Continuation of Discussion on Green Hedges School's Applications for a Conditional Use Permit and Modification of Site Plan Requirements

and neighbors, staff are concerned that the proposed 6' wooden fence may not be adequate for noise reduction. There are several sound-absorbing fencing options on the market that are considerably thicker than a standard fence and either include acoustic mineral wool or are designed specifically to reflect the noise back to its source. Both options have the potential to mitigate the noise entering neighboring properties, though the Town may remain open to other effective methods.

2. Providing the required 15' buffer around the entirety of 415 Windover Avenue NW.

In consideration of the noise issues addressed above, staff recommend consideration of maintaining the required buffer around the property, including a buffer between 415 Windover Avenue NW and 206 Lewis Street NW in the event the school divests itself of this property in the future. While this approach may impact the proposed underground stormwater storage facility or other site-plan provisions, it will the distance between the neighbors and on-campus noise that the zoning code prefers, and additional room for vegetation (which may also add stormwater mitigation capacity). This component could be offered as a condition to the approved CUP, or it could be done by recommending denial of a modification of requirements for buffer.

3. Six-year timeline to initiate Phase 2.

Green Hedges School has proposed a 24-month validity period for the start of its project but has not indicated the validity period for the start of the second phase. Staff recommends consideration of a six-year timeline, from the date of approval of the CUP, to begin work on Phase 2 of the Green Hedges School improvements. Should work not commence after this time, the applicant would need to apply for approval of this portion of the CUP to begin work on this phase.

4. Establish a single framework for campus uses, including school activities, rental groups, etc.

This approach would supersede any previous conditions and would include hours of use and the number of permissible events per month. These conditions should address the use of all campus facilities, including the playing field and the proposed gymnasium.

Additional Information from Applicant

Staff received additional materials from the applicant at 4:10 p.m. on January 23, 2026. Due to the timing of submittal and the meeting posting requirements, staff has not had sufficient time to fully review or analyze these materials for inclusion in this addendum.

Continuation of Discussion on Green Hedges School's Applications for a Conditional Use Permit and Modification of Site Plan Requirements

The additional materials submitted by the applicant are included in the agenda packet as the following attachments:

- **Attachment 23:** Letter to Planning Commission 01.23.26
- **Attachment 24:** Clean CUP Conditions 01.23.26
- **Attachment 25:** Redlined CUP Conditions 01.23.26
- **Attachment 26:** 2026-01-23 Revised Layout Exhibit
- **Attachment 27:** Buffers with Adjacent Neighbors 01.23.26 (REV)
- **Attachment 28:** 2026.01.23_Buffer revision
- **Attachment 29:** 2026.01.21_Fence and planting illustrative

Any additional materials received after posting will be added as subsequently numbered attachments as they are received.



STAFF REPORT COVER SHEET

January 14, 2026

ATTACHMENT 01

Address:	415 Windover Ave NW	Case Number:	PF-1925356-CUP PF-1815108-SP
Meeting Date:	1/14/2026	Applicant:	Green Hedges School
Board/Commission:	Planning Commission	Owners:	Green Hedges School
Existing Zoning:	RS-12.5	Existing Land Use:	Institutional
Brief Summary of Request:	<p>Recommendations to</p> <p>1) Board of Zoning Appeals on request to amend an existing Conditional Use Permit to increase number of students from 190 to 225 and staff from 42 to 50.</p> <p>2) Town Council on request for modifications of site plan requirements related to lot coverage, frontage improvements, parking and loading standards, landscaping, buffering, and bicycle parking.</p>		
Site Improvements:	<p>The existing facility is comprised of several buildings: the administrative center (or Kilmer House), the Rice Arts Center, a general-use field, a house used as the residence by the Head of School, an educational garden, and Kilmer Hall.</p> <p>The proposed phased improvements to the school site include the addition of a new gymnasium, a new athletic field, new playgrounds, the demolition of the Rice Arts Center, several smaller buildings, a new academic building on Windover Avenue, and the modernization of Kilmer Hall.</p>		
Size of Property:	197,416 square feet or 4.5 acres (Lot 0007 – 10,148 sf; Lot 0008A – 187,268 sf)		
Public Notice Requirements:	<ul style="list-style-type: none"> • Two signs were posted on the property, one at the entrance on Nutley Street NW and the other at the intersection of Lewis Street NW and Windover Avenue NW, on December 31, 2025 with the date of Planning Commission meeting and Board of Zoning Appeals (BZA) hearing. • Letters were sent on January 9, 2026, to adjacent, abutting and immediately across the street property owners/agents/occupants and subject property owners notifying them of the Planning Commission meeting and Board of Zoning Appeals hearing. The Town Council meeting date has not been set at this time. An email was sent to the applicant and property owner on January 2, 2026. • A letter was sent to the Fairfax County Department of Planning & Development on December 31, 2025, notifying them of the proposed case and meeting dates for the Planning Commission and Board of Zoning Appeals. • Advertisement for two successive weeks of the BZA meeting in a newspaper having paid general circulation in the Town prior to Board of Zoning Appeals meeting scheduled for Wednesday, February 18, 2026. 		
Official Submission Date of Approval:	On November 13, 2025, the conditional use permit application was deemed by staff to be complete.		
Deadline for Action:	The BZA should take action by February 11, 2026, which is 90 days after the application was deemed complete. That date is directory, rather than mandatory; the Board does not lose jurisdiction to act after the time period has passed. The applicant has indicated its support of the BZA hearing the case at its meeting on February 18, 2026.		

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Brief Analysis		
PROPERTY HISTORY		
<p>The Green Hedges School parcel is located in northwest Vienna, bordered by Windover Avenue NW, Nutley Street NW, and Lewis Street NW. The property is zoned RS-12.5 (Single-Family Detached Residential, 12,500 sq. ft. minimum lot size). It lies just outside the boundaries of the Windover Heights Historic District.</p> <p>The campus includes multiple structures: the administrative center (or Kilmer House), the Rice Arts Center, a general-use field, a house used as the residence by the Head of School, an educational garden, and Kilmer Hall.</p> <p>Green Hedges has operated in Vienna since 1955. Its initial Conditional Use Permit (CUP) approval occurred in 1964, with several subsequent amendments modifying enrollment and site development rights and responsibilities over time. Confirmed Town records show CUP amendments in 1964, 1978, 1981, 1985, 1997, 2000, 2007, and 2017, addressing enrollment limits, building additions, parking, circulation, and operation hours.</p> <p>Under the currently approved CUP, the school is limited to a maximum enrollment of 190 students and a maximum of 42 full-time employees.</p>		
COMPATIBILITY WITH THE COMPREHENSIVE PLAN		
<p>The 2015 Comprehensive Plan Future Land Use Map (page 38) designates the property as Institutional, which includes public and private schools and similar educational facilities. This designation establishes that the use itself is appropriate for the site.</p> <p>However, the Comprehensive Plan also outlines broader goals relevant to evaluating a CUP amendment, including the need to ensure compatibility with surrounding residential areas. The proposed changes do not inherently conflict with the Institutional land use classification. Their compatibility depends on site design, traffic management, buffering, and operational conditions, all of which are addressed later sections of this report.</p>		
COMPATIBILITY WITH THE ZONING ORDINANCE		
<p>The parcel is zoned RS-12.5, which is a single-unit residential district. Within this zoning district, “School, Elementary, Middle, and High” is not a by-right use; it is permitted only through approval of a CUP pursuant to Chapter 18 of the Town Code. The Zoning Ordinance requires that a conditional use demonstrate compatibility with the surrounding residential district through appropriate scale, site design, operational management, circulation, buffering, and mitigation of off-site impacts. Compatibility must be evaluated based on measurable impacts and is addressed later in the report. Previous BZAs have found the use, in general, to be compatible, with the inclusion of conditions.</p> <p>In addition to the CUP amendment, the applicant has submitted a formal request for site plan modifications under Section 18-830 of the Zoning Ordinance. These requested modifications, which would allow the applicant to deviate from certain standard requirements/regulations on the site, include increased lot coverage, variation from required frontage improvements, relief from standard loading requirements, adjustments to parking lot landscaping, buffer modifications, and relief from long-term bicycle parking requirements.</p> <p>The requested site plan modifications and CUP amendments must be reviewed together, as approval of one is contingent upon compatibility and successful mitigation demonstrated in the other.</p>		
Attachments:	<ul style="list-style-type: none"> 01 – Staff Report 02 – Applications and Authorizations Conditional Use Permit: 03 – CUP Narrative 04 – CUP Plans 05 – Conceptual Building Plans 06 – Campus Plan and Supplemental Document (Traffic & Circulation, Buffers, & Stormwater) 07 – Redlined CUP Conditions 	<ul style="list-style-type: none"> Modifications of Requirements: 08 – Site Plan Modification Request Letter 11.03.25 09 – Green Hedges Site Development Plan 11.03.25 Additional Staff Materials & Public Comments: 10 – History of Applications and CUP Orders 11 – Complaints reported to Zoning Administrator as of 01.05.26 12– Relevant Regulations 13 – Public Comments 14 – Notification Affidavit
Author:	Kelly O’Brien, AICP, Deputy Director of Planning and Zoning	

I. INTRODUCTION

The Planning Commission is asked to consider two separate but interrelated applications submitted by Green Hedges School for 1) a Conditional Use Permit (CUP) amendment; and 2) related Modifications of Requirements. Green Hedges seeks to modernize portions of its campus, revise operational limits to enrollment and staffing, and modify certain zoning development standards that affect site layout and circulation. Because these applications are interrelated, they are being presented together for coordinated review. Nonetheless, the Planning Commission’s task is to provide two recommendations, one for each application. The specific components, impacts, and compliance considerations for each application are discussed in detail in the subsequent sections of this report.

II. BACKGROUND

The Green Hedges School campus occupies approximately 4.5 acres across two parcels, 415 Windover Avenue NW and 206 Lewis Street NW, within the RS-12.5 residential zoning district (Figure 1). The combined campus includes academic buildings, administrative offices, the Rice Arts Center, outdoor recreation and play areas, a general-use field, landscaped open space, and a single-family residence used by the Head of School. The campus is surrounded primarily by single-family residential properties, with an established townhouse community located directly across Nutley Street NW. The property is situated just outside the boundaries of the Windover Heights Historic District.

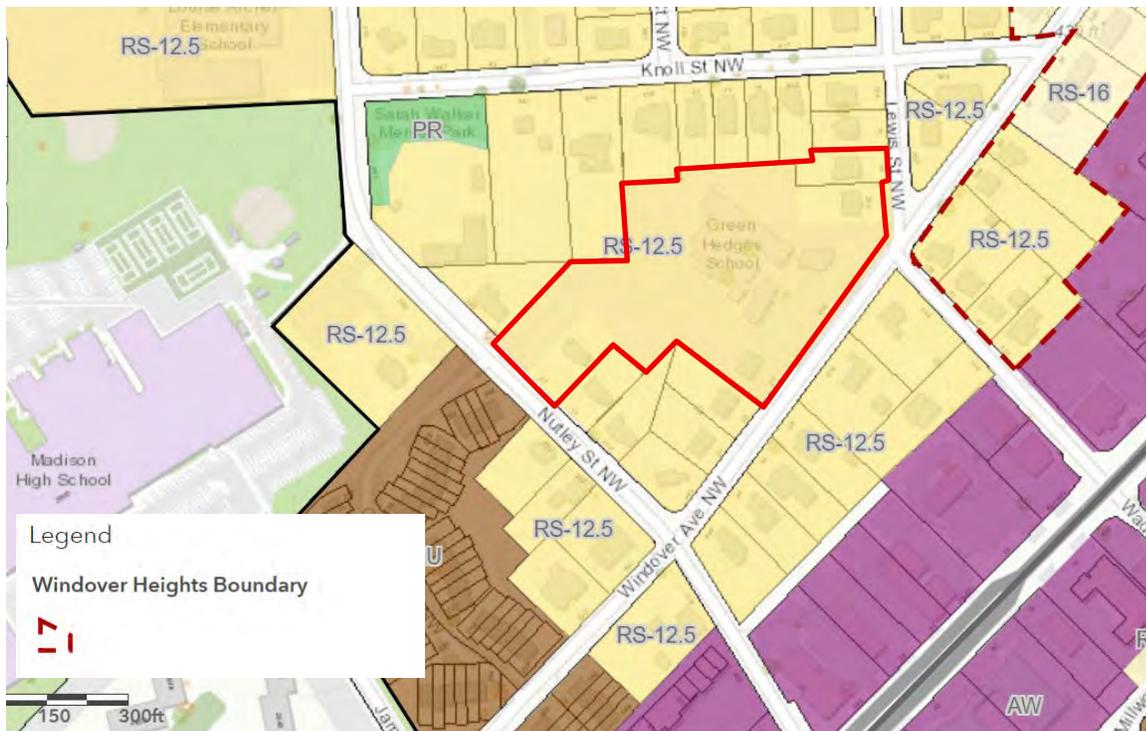


Figure 1 – Town of Vienna Zoning map with the Green Hedges School property outlined in red.

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As illustrated on the Town’s Comprehensive Plan Future Land Use Map (p. 38 of the Comprehensive Plan), the subject property is designated Institutional and Low Density Residential (Figure 2). Institutional areas in the Comprehensive Plan include public and private schools and related educational facilities that support community needs. Green Hedges School has occupied this site (with some changes to the school grounds) for 70 years, and the Land Use designation reflects the school’s continued role as an established institutional use within a predominantly residential context.



Figure 2 – Town of Vienna Future Land Use Map with Green Hedges School property outlined in red.

Green Hedges School has operated on the site since 1955 and has been subject to CUP oversight since 1964. As documented in Attachment 10 – History of Applications and CUP Orders, the school has applied and been approved for multiple CUP amendments and related actions between 1964 and 2017, reflecting incremental expansion of facilities, adjustments to enrollment, and changes to circulation, parking, and site layout. Early approvals focused on establishing enrollment limits, relocating parking to the rear of buildings, and addressing pickup/drop-off circulation on Windover Avenue and Nutley Street. Subsequent amendments in 1978, 1981, and 1985 increased enrollment to the currently permitted maximum of 190 students and established the staff limit of 30 employees. Later approvals in 1997 and 2007 authorized building additions, site plan modifications, stormwater improvements, parcel consolidation, and relocation of athletic and play facilities. The most recent action in 2017 permitted additional parking at 202 Lewis Street NW and increased staffing to 42 employees.

III. PROPOSAL

Conditional Use Permit

The Conditional Use Permit (CUP) amendment does not affect the school’s existing authorization to operate; rather, the applicant is requesting approval of changes to enrollment, staffing levels, building configuration, and associated site improvements. If the CUP amendment is not approved, the school will continue operating under the existing CUP conditions, including current enrollment and staffing caps.

The application proposes increasing maximum enrollment from 190 to 225 students and increasing full-time staff from 42 to 50, with both increases tied to issuance of an Occupancy Permit for a new academic building. The CUP also seeks approval to expand Kilmer Hall, construct a new academic building in place of the Rice Arts Center, develop a recreation field previously approved but not built, improve arrival and dismissal circulation, update stormwater facilities, and enhance landscaping and fencing along the school perimeter. No changes are proposed to the school's current hours of operation, extracurricular activities, or facility rental practices.

A narrative from the applicant describing the proposed operational updates, phasing, circulation, and campus improvements is included as Attachment 03. While the application outlines multiple project components, these elements are interrelated features of a single campus modernization effort and are not intended to be implemented independently of one another.

Furthermore, the proposed CUP amendment, in combination with the request for Modifications of Requirements, necessitates a new and updated site plan for the campus that would supersede previous CUP-related approvals. Because multiple earlier CUP orders remain in effect today, staff believes it is in the best interest of the school, the neighborhood, and the Town for the BZA's final decision on this application to clearly establish which components of prior CUP approvals remain applicable and which are superseded by the new approval. Clear determination of the controlling conditions will help ensure consistent administration, enforcement, and long-term operational certainty for all parties.

Further discussion of operational impacts, including traffic, buffering, stormwater, and site compatibility, is provided in later sections of this staff report.

Modifications of Requirements

In conjunction with the CUP, the applicant requests approval of several Modifications of Requirements under Section 18-830 of the Zoning Ordinance. These modifications relate to lot coverage, frontage improvements, loading, internal parking lot landscaping, perimeter buffers, and bicycle parking. Specifically, the applicant seeks to:

- increase permitted lot coverage from the previously approved 32.2% to 47.8%;
- modify required sidewalk and street section improvements along Lewis Street and Windover Avenue;
- waive the required loading space based on operational needs;
- allow deviation from the landscaped parking lot interior island requirements in order to accommodate underground stormwater management facilities located beneath the parking areas;
- adjust buffer widths while supplementing vegetation and fencing; and
- wave required long-term bicycle parking.

These requests are included because the proposed campus improvements, circulation reconfiguration, and stormwater upgrades cannot be accommodated within existing dimensional and design requirements. Because site layout, traffic circulation, buffering, and stormwater systems form the foundation of the CUP impact analysis, the Modifications of Requirements directly affect whether the proposed expanded enrollment and staffing can be accommodated without adverse impacts. The CUP amendment and the Modifications of Requirements must therefore be considered together, as approval of one is dependent on the

compatibility and mitigation measures achieved through the other. Detailed analysis of each modification request is provided in subsequent sections of this report.

IV. STAFF ANALYSIS

The Conditional Use Permit (CUP) amendment and associated Modifications of Requirements must be evaluated using the criteria set forth in the Town Code, including the findings required under §18-824.3, and for consistency with the Town's Comprehensive Plan. These standards require that the proposed use not adversely affect health or safety, that it not be detrimental to the public welfare or neighboring properties, that it be consistent with adopted land use policies, and that it meet all applicable use-specific and development standards. In addition, the requested Modifications of Requirements must demonstrate that the alternative design supports compatibility, mitigates impacts, and does not create new adverse conditions.

Sheet C-009A of the Site Development Plan (Attachment 09) contains the applicant's zoning compliance chart, summarizing how the proposed development compares to baseline code requirements. Staff has provided comments to the applicant noting needed revisions to this chart, particularly regarding loading space requirements and bicycle parking. For clarity, the plan set presents existing conditions and proposed conditions in two phases, which reflect the sequencing of construction and occupancy. To support the Commission's review, staff has grouped the relevant sheets by topic below:

- **Buffers:** See sheet C-010A
- **Canopy Coverage:**
 - Existing conditions see sheet C-005;
 - Phase 1 see sheet C-023;
 - Phase 2 see sheet C-036
- **Lot Coverage:**
 - Existing conditions see sheet C-012;
 - Phase 1 see sheet C-024;
 - Phase 2 see sheet C-037
- **Traffic Circulation:**
 - Existing conditions see sheet C-011;
 - Phase 1 see sheet C-025;
 - Phase 2 see sheet C-038

These sheets form the technical basis for staff's analysis of the CUP amendment and the requested modifications. They illustrate how the proposed campus improvements, circulation changes, and building expansions interact with dimensional standards, buffering requirements, stormwater placement, and pedestrian/vehicular movement. The following sections evaluate these elements in relation to the Town Code criteria, the Comprehensive Plan, and the anticipated operational impacts.

Consistency with the Comprehensive Plan

The Comprehensive Plan designates the Green Hedges property as Institutional, with a portion of the site adjacent to Lewis Street NW identified as Low Density Residential. This land use classification recognizes the long-standing presence of the school on the property and supports educational and community-serving institutional uses in established neighborhoods. Under this designation, modernization of the school's facilities and reinvestment in campus infrastructure

are generally consistent with the Plan's objectives, provided that physical improvements, circulation changes, and operational impacts remain compatible with surrounding residential properties.

The Comprehensive Plan also emphasizes broader policy goals relevant to the evaluation of a Conditional Use Permit amendment, including maintaining safe and efficient transportation networks, ensuring appropriate transitions between institutional and residential uses, and managing stormwater and environmental impacts in a manner that protects adjacent properties. The applicant's proposal includes new sidewalks, expanded internal circulation areas, enhanced buffering, improved stormwater management facilities, and reconfigured parking, all of which align with these guiding principles.

While the proposed improvements support several Comprehensive Plan goals, the requested increases in enrollment and staffing introduce additional operational considerations that must be evaluated for neighborhood compatibility, particularly with respect to traffic, stacking, and event activity.

Conditional Use Criteria

Final consistency with the Zoning Code depends not solely on the physical improvements and type of use, but also on whether the operational impacts associated with increased capacity can be mitigated through enforceable conditions and coordinated site design.

Zoning Ordinance *Sec. 18-824. - Conditional Use Permit* requires applicants to provide a statement of compliance with the four conditions for approval of Conditional Use Permits, and plans to control any potential impacts of the proposed use on the nearby community, including the following:

Noise Levels

The primary sources of noise on-site include outdoor play activities, athletic/recess periods, existing HVAC and mechanical equipment, vehicular activity during arrival and dismissal, and special events both during and outside of normal operating hours. The applicant proposes no change to the school's operating hours, outdoor programming, or event schedule that would elevate noise impacts beyond existing conditions, though staff notes the possibility that each outdoor program and event could involve, on average, more students. New mechanical systems associated with the expanded buildings will be required to meet the Town's noise ordinance at the property line and must be screened as part of site plan review.

Staff finds that general daytime noise associated with school functions remains compatible with the surrounding residential area, but recommends that final mechanical equipment locations and shielding be reviewed with the final site plan. Staff also recommends further discussion with the applicant regarding the noise impacts from special events, both during and outside of normal operating hours, as it is a continual area of concern for surrounding neighbors.

Odors

A trash enclosure exists on the site currently and the applicant has no plan to expand or modify the existing condition. Staff is unaware of any complaints related to odors. No odor-generating uses are proposed.

Trash and Litter

Trash generation will increase proportionally with increased enrollment and staff but will remain consistent with typical school operations. The existing dumpster location along the interior of the campus will be maintained, and the applicant proposes screening consistent with Town standards. Waste collection typically occurs during normal weekday hours and is accommodated on-site without blocking public streets; however, neighbors have recently submitted several complaints noting that trash pickup has occurred before 7 AM, which is a violation of the Town's noise ordinance (See Attachment 11). Staff notes that litter associated with outdoor events has been a periodic concern in the past; however, no change in event programming has been proposed, and the applicant notes existing litter management practices will continue. Staff recommend ensuring that final dumpster enclosure and access routes comply with screening and maneuvering standards at the site plan stage.

Loading and Unloading

The applicant requests relief from the Town's standard loading requirement. Deliveries to the school are limited and generally consist of box trucks or smaller vehicles that load on site during normal business hours. The school does not accommodate large freight deliveries. The applicant proposes to continue using designated interior parking areas for loading/unloading, ensuring activities do not occur in the public right-of-way.

Staff find that loading demands are modest and can be managed on-site but recommend that loading hours remain limited to weekday daytime hours and avoid conflicts with arrival/dismissal traffic.

Parking, Traffic and Circulation

Department of Public Works (DPW) staff reviewed the applicant's circulation plan and partial traffic analysis provided in the Campus Improvement Plan. Although a formal Traffic Impact Analysis (TIA) is not required, staff requested that an analysis be submitted due to the scale of the proposed enrollment and staffing increase. An official TIA was not submitted but some traffic analysis was included in the Campus Improvement Plan document (Attachment 06).

The analysis included both existing and proposed conditions along with mitigations for the proposed impacts. The applicant proposes 66 on-site parking spaces and a reconfigured internal circulation system designed to increase queueing capacity during peak arrival and dismissal periods. The Campus Improvement Plan includes geometric drawings demonstrating stacking between 62 and 74 vehicles depending on final adjustments.

While the proposed improvements will increase the number of students, thus the number of vehicles entering/exiting the development, the applicant is proposing mitigations to reduce impacts to the adjacent roadways. The applicant will be adjusting their drop-off process, modifying their drop-off/pick-up circulation, and increasing vehicular stacking capabilities. With these mitigations, staff believe the applicant has reduced the potential for stacking to overflow onto the adjacent roadways. Based on these details, DPW does not believe the proposed improvements will significantly impact the adjacent roadways and/or intersections.

As a part of the review process, DPW requested that the applicant add to its plan a mid-block pedestrian crosswalk across Nutley St NW. This improvement was requested at the specific location shown on the plan on Nutley St NW for the following reasons:

- Based on site observations within this area, there are numerous pedestrians crossing (mid-block) and at the specific location DPW requested the crosswalk, especially when James Madison High School is dismissed each afternoon.
- Placing a mid-block style crossing at this specific location will help reduce the vehicle-to-pedestrian conflict points versus placing it closer to/at the driveway entrance.
- It will also help provide space for the appropriate crosswalk signage and the space for a potential RRFB (pedestrian flashing signage) if determined necessary in the future.

Staff notes a distinction between routine daily traffic operations, which appear to be reasonably addressed through proposed mitigations, and occasional peak-demand events, for which insufficient analysis has been provided. It is unclear how the proposed increase in students and staff would affect special events where parents and others are on the campus in terms of both traffic and the demand for parking. Because amendment of a CUP is discretionary, staff recommend requiring a more complete operational analysis to ensure clarity regarding impacts. This is an area for Planning Commission and Board of Zoning Appeals exploration, especially considering that special events have been a source of neighborhood concern under the current CUP.

Use Capacity (Patrons, Students, Staff)

The applicant proposes to increase maximum enrollment from 190 to 225 students and the maximum number of full-time employees from 42 to 50, with both increases tied to the completion and occupancy of the new academic building. As outlined in the redlined development conditions, enrollment would remain capped at 190 students until an Occupancy Permit is issued for the new academic building, after which enrollment could increase gradually by no more than ten additional students per school year, up to the overall maximum of 225. Similarly, staffing would remain limited to 42 full-time employees until the new academic building is occupied, after which staffing levels could increase at a rate of no more than two additional full-time employees per year, up to a maximum of 50.

This phased approach distributes the impact of increased capacity over multiple years, allowing the Town to monitor the effect of incremental changes rather than accommodating the full increase at once. The applicant's circulation plan, parking reconfiguration, and expanded stacking capacity are based on these projected full-build figures. However, staff notes that while physical campus improvements alone do not generate traffic impacts, increases in students and staff directly influence daily arrival and dismissal activity, as well as occasional event-related parking demand. As stated previously, no formal Traffic Impact Analysis was submitted, though the applicant provided a partial operational assessment as part of its Campus Improvement Plan. Staff found this information helpful for understanding daily circulation flow, but observes that it does not quantify the potential effect of higher enrollment and staffing levels on special events, weekend programming, summer programming, or other activities outside the normal school day.

Because the amendment of a Conditional Use Permit is discretionary, and because Section 18-824.3 of the Town Code requires a finding that the proposed use will not adversely affect health,

safety, or neighboring properties, staff recommends that the Planning Commission and Board of Zoning Appeals evaluate whether the gradual increase in capacity is sufficiently supported by the proposed stacking, parking, and circulation improvements, and whether additional information or conditions may be appropriate to address event-related impacts.

Hours of Operation

No changes to existing hours of operation are proposed. The school's schedule currently aligns with typical daytime instructional hours, with limited after-school activities and events allowed under the existing CUP. Existing conditions governing outdoor activity, lighting, and community use will remain in effect unless modified by the Planning Commission or BZA.

Modifications of Requirements

Lot Coverage

The applicant requests an increase in lot coverage to approximately 47.8 percent, which exceeds both the RS-12.5 district maximum (25 percent) and the previously approved limit of 32.2 percent. According to the applicant, additional coverage is necessary to accommodate the proposed new academic building, the expansion of Kilmer Hall, internal circulation improvements, expanded stacking space, and new stormwater management facilities. While the increase is substantial, the applicant notes that comparable institutional uses in residential districts have been granted higher coverage levels under site plan and CUP approvals. Staff acknowledge that improved on-site circulation and the addition of comprehensive stormwater facilities may offset some impacts of increased impervious area; however, the change remains significant and requires careful consideration of downstream stormwater capacity, visual impact, and long-term maintenance responsibilities. Further evaluation by the Planning Commission and BZA is appropriate to determine whether the increased coverage maintains compatibility with the surrounding residential neighborhood.

Frontage Improvements

The applicant proposes to modify standard frontage improvements along Windover Avenue NW and Lewis Street NW. The requested modification would allow the sidewalk to shift partially internal to the site to preserve mature trees and achieve consistent pedestrian connections. DPW has separately requested the addition of a mid-block pedestrian crossing on Nutley Street NW based on observed safety concerns. The applicant has shown the crosswalk on the plans but indicates the Town would construct and fund it. Clarification is needed regarding responsibility for installation, signage, ADA ramps, and any potential future RRFB. Staff support improving pedestrian safety and maintaining continuity of the sidewalk network but recommends that the Planning Commission and BZA confirm the scope, responsibility, and timing of these improvements before acting on the modification request.

Loading Space

The applicant seeks relief from the requirement for one off-street loading space. Deliveries to the school occur infrequently and are typically accommodated by smaller vehicles during regular business hours. The applicant proposes to continue handling loading and unloading within interior drive aisles, away from public streets and outside peak arrival/dismissal times. Based on the school's operational profile, staff find that the loading demand is limited and can continue to be managed on-site without a dedicated bay, provided loading activity remains restricted to weekday daytime hours and avoids conflict with student arrival and dismissal. The Planning

Commission may consider recommending that these operational limits be incorporated as conditions.

Parking Lot Landscaping

The school requests modification of interior parking lot landscaping requirements due to the placement of new underground stormwater management facilities beneath both parking areas. These facilities prevent large canopy trees from being planted above them. The applicant proposes to meet the required perimeter landscaping while reducing interior island plantings. Staff recognize that the underground stormwater infrastructure provides significant functional benefits, but note that reduced interior planting may affect shade, heat-island mitigation, and visual screening. Staff recommend that the Planning Commission evaluate whether supplemental plantings around the perimeter or alternative species that can be accommodated above stormwater chambers would achieve the intent of the ordinance.

15-foot buffer

The applicant requests modification of the standard 15-foot landscaped buffer along portions of the campus perimeter. Approximately 44 percent of the site will meet the full buffer width, while the remaining buffer areas would be reduced to between 3 and 10 feet due to site constraints, mature vegetation, and circulation needs. The proposal includes supplementing narrow areas with additional vegetation and a 6-foot wooden fence to provide visual screening. Staff acknowledge that preserving mature trees and augmenting them with fencing can achieve effective buffering, but reduced widths warrant close review given the adjacency to single-family homes. The Planning Commission may consider requiring evergreen screening, minimum opacity standards (including during winter months), and long-term maintenance plans to ensure the reduced buffer continues to function as intended. The Planning Commission may also consider recommending a smaller reduction than that which is requested, or reductions in certain requested locations but not others.

Long-term bicycle parking

The applicant seeks modification of the requirement for long-term bicycle parking. As an elementary and middle school, the current demand for long-term bicycle storage is limited. The applicant proposes 20 short-term bicycle parking spaces and indicates that long-term storage can be accommodated inside a building if future demand arises. Staff find this approach reasonable given current usage patterns but recommend that the school be required to provide secure indoor storage upon demonstrated need, as part of administrative review, without requiring a new CUP amendment.

Summary of Complaint History and Compliance Status

The Department of Planning and Zoning maintains a record of complaints submitted by residents regarding Green Hedges School. The Zoning Administrator's log from 2022–2026 is included as Attachment 11.

The record reflects a mixture of confirmed zoning or CUP violations, unsubstantiated complaints, and operational concerns that do not constitute violations under the Town Code. While the Zoning Administrator did not find that many of the complaints were enforceable as zoning violations per Chapter 18 of the Town Code, or under the Conditional Use Permits, conditions

described may relate to neighborhood compatibility. The table in Attachment 11 includes only complaints reported directly to the Zoning Administrator; it does not capture complaints submitted through other channels. For example, the Vienna Police Department has received occasional noise-related calls, including reports of early-morning deliveries occurring before permitted hours. None of these calls resulted in a citation or enforcement action, other than reminding the contractors of the permitted hours of operation, but their occurrence provides additional context regarding how school operations are experienced by nearby residents.

Most documented zoning-oriented complaints fall into several recurring categories:

- (1) use of outdoor areas during times not permitted;
- (2) rental activity occurring outside buildings rather than indoors;
- (3) event-related parking and traffic impacts;
- (4) communication with neighbors; and
- (5) landscape buffer maintenance.

Where violations were confirmed, the Town issued Notices of Violation and required corrective actions, which the school implemented. Examples include restricting rental activity to interior spaces, ensuring that the use of the field complied with the weekday hours of 8:00 a.m. to 6:00 p.m., and correcting improper parking practices. In these cases, the Zoning Administrator verified compliance after corrective measures were taken.

Several other complaints were determined not to be violations. These included concerns about members of the public parking on public streets, occupied vehicles queuing temporarily within fire lanes during arrival and dismissal, informal use of outdoor areas by rental attendees or community members, overnight parking of operable private vehicles on school property, and lighting or fencing conditions that were deemed “vested” under earlier approvals. In each of these instances, the Town provided clarification to complainants regarding what is and is not regulated under the existing CUP and Zoning Ordinance.

A smaller number of complaints identified erosion of previously approved canopy coverage. These were initially confirmed as violations of the approved 2017 site plan due to the removal of trees on campus without a new tree canopy coverage analysis. Research into what corrective measures may be needed is on-going. The site plan submitted for this application contains documentation of the canopy coverage that was not previously available.

Staff notes that many complaints relate to event parking, an issue that is highly sensitive in residential areas but is not, in itself, a zoning violation unless parking occurs on unapproved surfaces or in a manner that blocks access aisles. Parking on public streets is permitted, and the Green Hedges School cannot prevent members of the public from parking legally on the street during school events. The school has shared with the Town examples of communications to event attendees to park on campus or in a designated off-site parking lot. The frequency and pattern of these complaints illustrate that event management is a primary point of friction between the school and nearby residents. This aligns with the Transportation staff’s recommendation that event-related parking and traffic be specifically addressed as part of Planning Commission and BZA review.

In summary, while the majority of the complaints recorded between 2022 and 2026 did not constitute zoning or CUP violations, the cumulative record demonstrates that event management, communication, parking logistics, and maintenance of buffers are recurring areas of concern for adjacent residents. As the Commission evaluates the CUP amendment and Modifications of Requirements, these recurring themes can assist in determining whether additional conditions, updated communication protocols, enhanced landscaping, or event-specific management provisions are warranted to ensure compatibility consistent with §18-824.3 of the Zoning Ordinance.

V. CONDITIONS OF APPROVAL

The applicant has submitted a redlined version of the school's existing development conditions, which incorporates proposed changes to enrollment, staffing, hours, phasing, and operational commitments (Attachment 07). Staff have reviewed these proposed conditions and recommends that the BZA consider adopting updated conditions that provide clear, consolidated direction for future administration and enforcement.

Because multiple CUP orders remain in effect today, and because several past approvals contain conditions that have become outdated, staff recommend including an explicit condition stating that the conditions approved with this application supersede all prior CUP-related approvals. This will ensure that the Town, the applicant, and nearby residents have a single, authoritative set of conditions governing operations, enrollment, staffing, event management, buffering, circulation, and campus improvements.

Such a condition could read as follows:

"The conditions approved with this CUP amendment supersede and replace all conditions from prior CUP approvals for Green Hedges School. Upon approval of this application, only the conditions established herein shall govern the use and development of the property."

This language promotes administrative clarity, eliminates contradictory legacy provisions, and streamlines enforcement.

Staff further recommends that the Planning Commission and BZA consider whether additional conditions are warranted to address recurring neighborhood concerns, including:

- timing and communication of special events
- maintenance of required tree canopy, buffers and screening
- adherence to prescribed arrival/dismissal procedures
- enforcement of trash collection hours
- ongoing evaluation of event parking demand

These are not proposed as conditions but are recommended areas for Planning Commission and BZA discussion and refinement.

VI. REQUIRED COMMISSION/BOARD APPROVALS

The process for review and approval or denial of an application for a Conditional Use Permit (CUP) is outlined in Section 18-824 of the Town Code. After initial staff review, the Planning Commission reviews the application in order to make a recommendation to the Board of Zoning Appeals, per Section 18-824.6.D. The Board of Zoning Appeals, per Section 18-824.6.E., reviews the application, along with the Planning Commission recommendation and public testimony, and makes the final decision. It also includes any conditions that it believes to be necessary.

Per Section 18-824.4, the Board of Zoning Appeals shall fix a reasonable time for the hearing of an application, within ninety (90) days of the application being deemed complete. This time period is directory, rather than mandatory; the Board does not lose jurisdiction to act after the time period has passed.

The process for review and approval or denial of an application for a Modification of Requirements is outlined in Section 18-830 of the Town Code. After initial staff review, the Planning Commission, per Section 18-830.2.C., reviews the application, taking into account consistency with the Comprehensive Plan and the integrity of the Town code. The Commission then prepares a recommendation to the Town Council, which makes the final decision, taking into account the Planning Commission recommendation.

There is no directed timeline for the Modification of Requirements process.