



SAVANNAH HISTORIC DISTRICT BOARD OF REVIEW

REQUEST FOR CERTIFICATE OF APPROPRIATENESS

Petitioner: Rose Architects, Kevin Rose

MPC File No.: 25-005674-COA

Address: 402 East Broughton Street

PIN: 20004 42012

Zoning: D-CBD

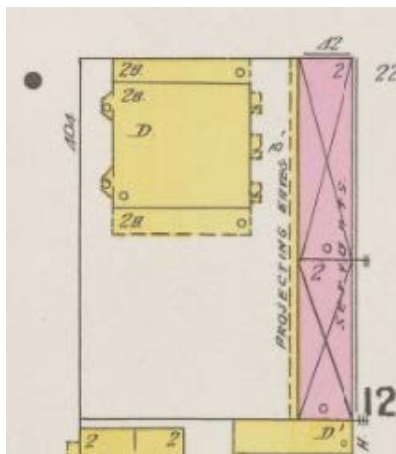
Staff Reviewer: Jodie Brown, AICP

Date: April 8, 2026

NATURE OF REQUEST:

The applicant is proposing to construct a multi-story building. This is a Part 1 review of the project which includes review of three (3) Special Exceptions requests.

CONTEXT/SURROUNDING AREA:



The existing building was approved for demolition at the September 2025 HDBR meeting. It was built in 1966 and received a new façade in 1985. It is located on the northeast corner of Broughton and Habersham Streets. The one-story concrete block building has plate glass windows and a cantilevered awning. It housed Southern Motors for several years.

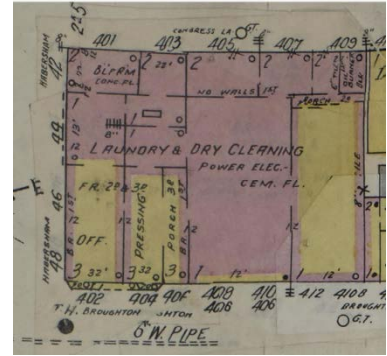
Prior to the extant building, there were number of iterations of buildings at the site. In 1884, there was a 2-story dwelling at the corner with a barn/dwelling along the rear lot line. By 1898, the dwelling had been modified with bay windows and covered porches. By 1916, the area had been converted to multiple store fronts along both Broughton and Habersham Streets with dwellings along the rear property line. In 1950, all of the lots were used for laundry and dry-

cleaning service. The corner lots were 3-stories while the area that was previously open was one-story.

The subject building is listed as a non-contributing resource within the National Historic Landmark District and the local Savannah Downtown Historic District.

PROJECT HISTORY:

This project was previously heard at the February 11, 2026, hearing and continued to allow the applicant to:



1. *Evaluate the code sections associated with Multiple Volumes, Roofline Variation, Setback Standard and Recess Standard to ensure that at least two of these design elements are incorporated into the building proposal.*

The applicant re-evaluated the potential design elements and redesigned the structure to incorporate two of them. The applicant incorporated Roofline Variation and Recess Standard into the revised design. The design elements will be discussed below under the applicable code section.

2. *Verify the exterior dimensions of the proposed building.*

The applicant verified the length and width of the proposed building to ensure that it was 90' x 120'.

3. *Apply for the Special Exceptions prior to the Part 2 review.*

The applicant applied for three Special Exceptions which will be discussed in further detail below.

SPECIAL EXCEPTIONS:

The following standards from §3.12 Special Exceptions apply:

Special Exceptions.

Review by Savannah Downtown Historic District Board of Review. Special Exceptions (as listed below) for the Savannah Downtown Historic Overlay District shall be considered by the Savannah Downtown Historic Board of Review.

Applicable Special Exceptions.

To adjust Preservation and Design Standards for local historic districts as follows:

Secs. 7.8.10, 7.9.10, and 7.11.10 Design Standards.

The applicant applied for three Special Exceptions:

- §7.8.10.r.ii—Vehicular access shall be from lanes or north-south service streets. When a property does not front a lane or north-south service street, parking may be accessed from east-west connecting streets or trust streets.
- §7.8.10.r.iii—Structured parking within the first story of a building shall be setback a minimum of 30 feet from property lines along all public rights-of-way (not including lanes). This standard does not apply to structured parking on the same lot as single [family](#) and two family residential dwellings that are either on a [corner lot](#) with lane access or on a parcel that does not have access to a lane.
- §7.8.10.t.v.1—Maximum height shall not exceed two (2) stories within 20 feet of a lane when across the lane from a D-N and/or a D-R zoning district.

Review Criteria for Special Exceptions. When reviewing a special exception request, a finding shall be made by the Savannah Downtown Historic District Board of Review for each of the criteria listed below.

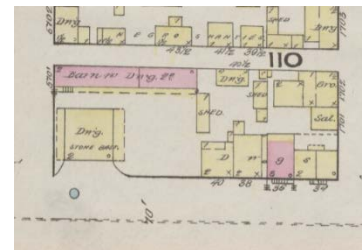
Whether the use for which the special exception is being considered would be located, operated, and maintained in a manner in conformance with the goals, policies, and objectives of the Comprehensive Plan and the provisions of this Ordinance.

All three Special Exceptions fall within the following goals and objectives.

- Economic Development Goals
 - Goal 2, “Foster a positive environment that provides opportunities for all business.”
 - Objective, “Prioritize growing local businesses as much as attracting new businesses.”
 - Goal 3, “Become a community with economically vibrant, safe neighborhoods and commercial centers.”
 - Objective, “Promote mixed-use development where appropriate.”
- Land Use Goals
 - Goal 1, “Establish growth policies for the City of Savannah to guide development and redevelopment in a responsible manner, encouraging compact/mixed-use development, walkable neighborhoods, increased connectivity and open space preservation.”
 - Objective, “Incentivize projects that are located in areas with existing infrastructure and within close proximity to services, making greenfield development less attractive and economical.”

Whether the special exception would not be detrimental to the public interest, health, safety, welfare, function, and appearance of the adjacent uses or general vicinity.

As it relates to vehicular access (§7.8.10.r.ii), based on the Sanborn Maps (at the right) access was present in 1884. By 1916, the corner was a Laundry and Dry Cleaning business. The business was a mix of 3 stories on the corner and one story on the interior. A historic photo (below) from 1940 clearly shows multiple curb cuts/aprons in



front of the business. By the time that Southern Motors was built on Broughton Street, ca. 1951-1966, there was access to the car lot from Broughton Street. With this information, it can be assumed that vehicular access has been present intermittently for at least 142 years and more recently on a daily basis for the last 50 plus years. Continued use of this driveway/apron would not be detrimental to

[illegible]

the proposed parking lot will be partially blocked by the exterior walls. This standard has been met.

The proposed new construction backs up to multiple parking/vacant lots. The vacant parcels that are directly to the north (one fronts on to Habersham Street and the other fronts on to Congress Street) could be three stories without a two-story stepdown at the lane. Directly to the east is a commercial property with a large parking lot at the rear and to the northeast is a vacant lot. The contributing duplex at 32-34 Habersham Street which is just beyond the vacant lot directly to the north, is not continually inhabited. It is listed as a Short-Term Vacation Rental (STVR) on the internet. Given the current use and potential future use of surrounding properties along with other contributing properties that do not have a step down at the lane, staff believes granting the Special Exception would not be detrimental to the public interest, health, safety, welfare, function, and appearance of the adjacent uses or general vicinity.



Additional Conditions, Restrictions and Safeguards. The Savannah Downtown Historic District Board of Review may include conditions, restrictions or limitations as part of the approval in order to protect public health, safety, and welfare. When a special exception is approved with conditions, those conditions shall run with the land and shall be binding on the original applicant as well as any successor.

Staff does not have any additional conditions related to the Special Exception.

Time Limitations for Approved Special Conditions. Approval of a special exception pursuant to the provisions of this Ordinance shall become null and void unless the following is completed in the time period specified:

For any special exception that would require a building permit, the related building permit shall have been issued and have remained continuously valid thereafter within two (2) years from the date the special exception was granted.

FINDINGS:

The following standards from §7.8 - Savannah Downtown Historic District Ordinance apply:

Secretary of the Interior's Standards and Guidelines for Rehabilitation. Material changes to contributing resources and resources that are eligible for listing as contributing shall be evaluated by use of the current edition of the Secretary of the Interior's Standards and Guidelines for Rehabilitation as published by the U.S. Department of the Interior. In considering proposals for alterations to contributing resources, the documented original design of the resource may be considered.

Secretary of the Interior's Standards 2– Historic Character. The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.

The proposed building is four stories; however, the fourth story involves a penthouse space with the elevator and stair access to the upper floor. The fourth-floor roof is situated at the building edge along Broughton Street to create a varied roofline. The small portion that is visible along the street is limited to 28' out of 120'. The height of the three-story portion is 42' which is comparable

to 422 E Broughton Street at 44'5 ½" and 420 E Broughton Street which is 45'3". The proposed building is consistent with Standard 2.

Secretary of the Interior's Standards 9– New Additions to not Damage. *New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale and architectural features to protect the historic integrity of the property and its environment.*

The proposed new construction is comparable to the size and scale of the other contributing commercial buildings along Broughton Street. The proposed design is sympathetic, but it is distinct. The proposed work is consistent with Standard 9.

Secretary of the Interior's Standards 10– New Additions Reversible. *New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.*

The proposed construction is a stand-alone building and will not impact surrounding historic resources if removed in the future. The proposed work is consistent with Standard 10.

Visual Compatibility Criteria. *To maintain the special character of the Savannah Downtown Historic District as identified in the architectural survey and visual analysis, new construction and any material change in appearance shall be consistent with the standards, criteria and guidelines developed for the district. The applicable criteria below shall be used to assess new construction and material changes. These criteria shall not be the basis for appeal to any board, commission or administrator described in this Ordinance, or to the Mayor and Aldermen.*

Height. *New construction shall be permitted to build to the number of stories as shown on the "Savannah Downtown Historic District Height Map," referred to herein as "Height Map," and the overall height of a building and the height of individual components of a building or structure shall be visually compatible to the contributing buildings and structures to which it is visually related.*

Per the height map, buildings are limited to three-stories. However, since the building has been deemed large-scale due to the square footage, the applicant is allowed an additional story if certain criteria are met. The applicant is proposing to meet those criteria.

Proportion of front façade. *The relationship of the width of a building or structure to the height of its front facade shall be visually compatible to the contributing buildings and structures to which it is visually related.*

The width of the building is 120' compared to the height of 51.2'. This width/height relationship is compatible with other contributing buildings along Broughton Street such as 201 East Broughton Street and 107 East Broughton Street. The project is visually compatible.

Rhythm of structures on streets. *The relationship of a building or structure to the open space between it and adjacent buildings or structures shall be visually compatible with the open spaces between contributing buildings and structures to which it is visually related.*

Generally, buildings are wall to wall along Broughton Street; however, in the area of the proposed building there are a number of vacant lots. The new construction will have limited space between it and the building to the east. Given the variation on the street, the proposed placement is consistent with the historic precedent and visually compatible with this criterion.

Scale of a building. *The mass of a building or structure and size of windows, door openings, porches column spacing, stairs, balconies and additions shall be visually compatible with the contributing buildings and structures to which the structure is visually related.*

The proposed building's first two floors feature storefront openings on a monumental scale similar to historically designed bank buildings. The openings feature a low wall at the base, large storefront windows, a sign band, and a large transom. Upper floor (3rd floor) windows are taller than wider consistent with historic window openings. The overall scale of the building is visually compatible with this criterion.

Directional expression of front elevation. *A building or structure shall be visually compatible with the buildings and structures to which it is visually related in its directional character, including vertical character, horizontal character, or nondirectional character.*

The proposed building will front onto Broughton Street consistent with other contributing properties in the immediate vicinity. The project is visually consistent with this criterion.

Savannah Downtown Historic District Design Standards. *The intent of these standards is to ensure appropriate new construction, additions, and alterations within the Savannah Downtown Historic District. They are not intended to promote copies of the architectural designs of the past, but to encourage contemporary designs that protect and complement existing contributing resources. They are further intended to protect the historic integrity of the contributing resources.*

The following design standards shall apply to new construction, additions, alterations to contributing and non-contributing buildings and structures, unless otherwise specified. Though certain building materials are prescribed herein, the Board may approve alternative materials that are not listed as prohibited upon a showing by the applicant that the material or product is visually compatible with historic building materials and has performed satisfactorily in the local climate.

For the purposes of evaluating the visual compatibility and design standards of exterior fenestration, where voids (windows, doors, and storefronts) in the exterior façade are substantially blocked by interior walls or built-in furniture, these may be considered part of the exterior wall if they are built within three feet of the exterior wall. For example, if an interior wall is built abutting the storefront, that interior wall is impacting the exterior design of the fenestration and may be subject to review by the Historic Board of Review.

Height. *The number of stories as shown on the Height Map shall be permitted. Variances from the Height Map shall not be permitted. Additionally, the following standards shall apply:*

The proposed building is three stories with a penthouse on the fourth floor which is consistent with the Height Map and the allowances made for large scale development.

Height, Commercial buildings.

The exterior expression of the height of the ground floor shall be not less than 14 feet, six (6) inches.

The first floor has an exterior expression of 15'. The proposed work is consistent with the historic district design standards.

The exterior expression of the height of the second story shall be not less than 12 feet.

The second floor has an exterior expression of 12'. The proposed work is consistent with the historic district design standards.

The exterior expression of the height of each story above the second shall be not less than 10 feet.

The third floor has an exterior expression of 12'. The proposed work is consistent with the historic district design standards.

Building Form. Building form is based on the height, mass and envelope of a building. The proposed building form for new construction shall comply with the following:

A proposed building located on an east-west through street shall utilize a contributing building form fronting the same street within the same ward or in an adjacent ward.

There are several buildings in the immediately adjacent area that have a similar form: 201 East Broughton Street, 192 East Broughton and 107 (105-123) E Broughton Street. The building form is consistent with this historic district standard.

Setbacks, Front yards. There shall be no front yard setbacks except as follows:

On tithing lots where there is a historic setback along a particular block face, such setback shall be provided. For the purpose of this Section, a historic setback is the average of the contributing buildings along a block face.

On a trust lot fronting a square, proposed buildings may establish a front yard setback not to exceed 20 feet.

There are no proposed setbacks. The work is consistent with the historic district design standards.

Parking and Paving. In addition to the requirements set forth in Sec. 9.3, Off-Street Parking and Loading, parking and paving shall comply with the following:

Parking areas shall be located in the rear yard. Properties on Trust Lots or with double street frontage are exempt from this provision.

Vehicular access shall be from lanes or north-south service streets. When a property does not front a lane or north-south service street, parking may be accessed from east-west connecting streets or trust streets.

The applicant has applied for a Special Exception related to this item which was reviewed earlier in the report. The vehicular entrance will be reduced to 16'. This standard has been met due to the Special Exception criteria being met.

Large-Scale Development Standards. *Large-Scale Development shall comply with the following standards. New construction monumental buildings shall be exempt from Large-Scale Development Standards.*

Visual Compatibility Criteria.

Design Standards. Should there be a conflict, the Large-Scale Development Standards shall take precedence.

Large-Scale Development, Footprint.

Building footprints shall not exceed 13,500 square feet within the National Historic Landmark District boundaries. Building footprints shall not exceed 40,500 square feet outside the National Historic Landmark District boundaries. Multiple buildings, as defined by Building Code, with building footprints equal to or less than the maximum permitted may be constructed for shared use(s).

The proposed building footprint is 10,445SF which is 3,055SF under the 13,500SF limit. The proposed work is consistent with the historic district design standards.

In D-C and D-R zoning districts, the building footprint shall occupy a minimum of 50% of the lot width along the lane.

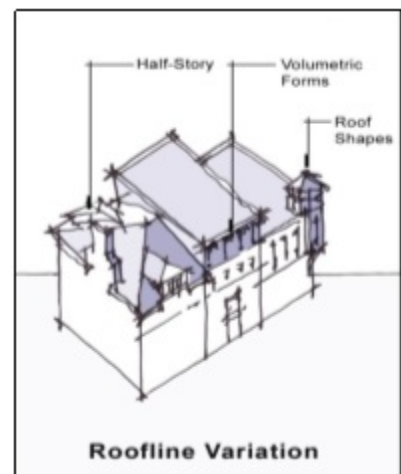
This is not applicable.

Large-Scale Development, Mass. *A minimum of two (2) of the following devices shall be incorporated into the design:*

Multiple Volumes. *Use multiple detached volumes made up of two (2) or more separate forms to break up the building into two (2) or more structures.*

The building does not express multiple detached volumes. This standard is not met; however, the applicant is only required to meet two (2) of the design elements.

Roofline Variation. *Frontage may be continuous, provided that the roofline shall be varied through the use of volumetric forms and roof shapes of varying heights. The roofline shall provide a minimum one-half story height variation within the street fronting façade.*



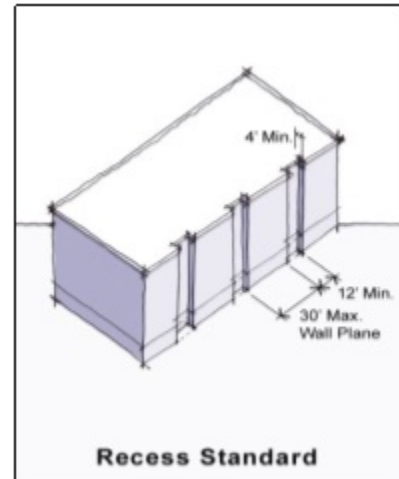
The applicant has a fourth story penthouse which is setback from the front façade. The penthouse has limited visibility and per the figure to the right, the roofline variation should be visible along the street frontage. To address this concern, the applicant has redesigned penthouse to pull the roofline to Broughton Street. They have provided two options, one (Option A) where the roof is supported two columns and a secondary option (B) that has the roof supported by a wall with punched in openings. Staff believes that Option B meets the standard.

Setback Standard. *Incorporate setbacks within the façade. Setbacks between street fronting walls shall be at least 24 feet wide and eight (8) feet deep and contain windows in the walls perpendicular to the street. Setbacks shall extend to the ground or begin immediately above the ground floor.*

The applicant designed the building to have a varied front wall with recesses and columns that stand proud. The recesses between the columns measure between 12' and 18'. One of the recessed areas is 4'6" deep. Several of the recessed areas feature glazing, however, it does not appear that any of the glazing is perpendicular to the street. This standard is not met; however, the applicant is only required to meet two (2) of the design elements.

Recess Standard. Incorporate recesses within the wall plane. Building frontage shall be limited to 30 feet with recesses of at least 12 feet in width and four (4) feet in depth. Recesses shall extend to the ground or begin immediately above the ground floor.

The proposed building was designed with a length of 120' along Broughton Street and 90' along Habersham Street. There are multiple columns that stand proud of the wall plane with a width of approximately 3'. In between the columns are large, recessed areas ranging from 12' to approximately 24'. The depth of each recess appears to be between 2' to 4'6". This standard is met.



Large-Scale Development, Height.

Large-scale development shall be subject to the Height standards in §7.8.9.b. and the provisions of Table 7.8-1.

For the purposes of this Section, large-scale development is any development whose combined ground floor footprint is equal to or greater than 9,000 square feet within a single parcel; or is four- (4) stories or greater in D-C and D-R zoning districts; or is five- (5) stories or greater in all other zoning districts within the Savannah Downtown Historic District. In the case of an addition to an existing building, the combined footprint and height of both the existing building and the addition located on the same parcel apply.

The proposed building footprint is 10,445SF which categorizes the building as large-scale.

Large-Scale Development, Height - All D-C and D-R Zoning Districts.

Historic Building: Maximum height shall not exceed one (1) story greater than a principal contributing building (excluding non-contributing additions and appendages; see Contributing Resources Map) on same or abutting lot, for a minimum distance of 30 feet, provided that the height does not exceed limit on the Height Map.

Roofline Variation: Maximum frontage of 60 linear feet of continuous height shall be permitted before a minimum one-half story variation is required. This variation shall be expressed in the roofline.

Lane: Maximum height shall not exceed two (2) stories within 20 feet of a lane.

The proposed building is located within D-CBD zone. This section does not apply.

Large-Scale Development, Height - All Other Zoning Districts.

Roofline Variation: Maximum frontage of 120 linear feet of continuous height shall be permitted before a minimum one-half story variation is required. This variation shall be expressed in the roofline.

The proposed frontage measures 120'. This standard is met.

Lane: Maximum height shall not exceed two (2) stories within 20 feet of a lane when across the lane from a D-C and/or a D-R zoning district.

The applicant has applied for a Special Exception. It was reviewed earlier in this report. This standard has been met due to the Special Exception criteria being met.

Additional stories above the Height Map for non-contributing Large-Scale Development.

The following properties are eligible for an additional story on the area of the building that is unaffected by the standards in Table 7.8-1.

D-C and D-R Zoning Districts: A maximum of one (1) story above the Height Map may be permitted for properties located on Oglethorpe Avenue, Liberty Street, Trust Lots, and outside the National Historic Landmark District boundaries.

This section does not apply.

All Other Zoning Districts: A maximum of one (1) story above the Height Map may be permitted.

The Height Map allows for 3-stories. The proposed building is designed with a penthouse on the 4th floor that is smaller in scale than the lower floors.

Access above the bonus story shall be the minimum necessary for mechanical maintenance and repairs only. Only one point of access (excluding hatch access) shall be permitted above the bonus story.

There is no access above the bonus story.

One or more of the criteria below must be met to qualify for an additional story:

Multiple Ground Floor Active Uses and Masonry Materials. Multiple ground floor active uses (as defined) permitted in the base zoning district span the length of the façade on all street fronting elevations (not including lanes) and maintain individual primary exterior entrances.

The building is designed to have multiple uses on the 1st floor which include a local bank and its public lobby, public offices and a coffee station which will activate Broughton Street. Additionally, an ATM will be located on the south side. Along Habersham Street there will be a community room with its own entrance.

The exterior of the building will feature stone/cast stone at the base. The third floor will use brick set back from the lower floor to create an additional sense of variation.

This standard has been met.

For rehabilitations, the active ground floor uses must replace previously inactive uses to qualify. Lobbies shall not occupy more than 30% or 60 linear feet

(whichever is greater) on the secondary facades provided that the total linear feet of the lobby area on the street-facing exterior does not exceed 120 linear feet.

This section is not applicable.

At least 50% (linear measurements) of active use space shall be designed so that their primary entrance is only accessed from the exterior.

The Broughton Street façade features two primary entrances that are less than the required 50% of the linear measurement. This standard is met.

Additionally, exterior building walls incorporate 100% modular masonry materials on all sides with the use of granite, marble, or other natural quarried stone over a minimum of 30% of all street fronting facades.

This section is not applicable.

LEED Gold Certification and Masonry Materials. *Achieve LEED Gold Certification, or verified equivalent, on the building. Substantial completion of certification requirements, and confirmation from the awarding agency, shall be required before a Certificate of Occupancy is issued.*

This section is not applicable.

STAFF RECOMMENDATION:

APPROVE the request for New Construction, Part I: Height and Mass at 402 East Broughton Street **AS REQUESTED**, because the work is visually compatible and meets the standards.

AND

APPROVE the Special Exception requests from the standards that reads:

- §7.8.10.r.ii—Vehicular access shall be from lanes or north-south service streets. When a property does not front a lane or north-south service street, parking may be accessed from east-west connecting streets or trust streets.
- §7.8.10.r.iii—Structured parking within the first story of a building shall be setback a minimum of 30 feet from property lines along all public rights-of-way (not including lanes). This standard does not apply to structured parking on the same lot as single family and two family residential dwellings that are either on a corner lot with lane access or on a parcel that does not have access to a lane.
- §7.8.10.t.v.1—Maximum height shall not exceed two (2) stories within 20 feet of a lane when across the lane from a D-N and/or a D-R zoning district.

to allow for vehicular access from Broughton Street, to allow for parking within 30' of the property line and to allow for elimination of the two (2) story requirement along the lane, because the Special Exception criteria are met.

MW: CC: JB

Note: This recommendation could change subject to new information provided at the Historic District Board of Review meetings. Final decisions will be made by the Historic District Board of Review at the public hearing based on information provided at the meeting, as well as information submitted for the staff recommendation.