



IN RE:

PRELIMINARY PLAN OF SUBDIVISION

**CASE NUMBER 4-23012** 

**APPLICANT:** 

**RENEWAL CHRISTIAN CENTER** 

# **STATEMENT OF JUSTIFICATION**

#### **OWNER/APPLICANT:**

Renewal Christian Center Albert B.K. Appiah, Pastor 3517 Global Hill Drive

Mitchellville, Maryland 20720

### **DEVELOPMENT TEAM:**

**CIVIL ENGINEERS:** 

ATWELL, LLC

Barry Caison, PE Kevin Garvey, RLA

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ARCHITECT:

MICHAEL GRAVES ARCHITECTURE AND DESIGN

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LEGAL COUNSEL:

LAW OFFICE OF MIDGETT S. PARKER, P.A.

Midgett S. Parker, Jr., Esq. 5827 Allentown Road

Camp Springs, Maryland 20746

**ELECTION:** 

PROCEED PURSUANT TO PRIOR SUBDIVISION REGULATIONS

# I. PROPERTY DESCRIPTION & LOCATION

- A. Address of Property for this Preliminary Plan of Subdivision 6601 Chew Road, Upper Marlboro, MD 20772 consisting of Lot 1, with 23.37 acres of land (the "Property").
- B. Existing Use Vacant undeveloped land.
- C. Proposed Use Church or similar place of worship with 500 seats. The proposed building shall have a total 24,920+/- square feet of gross floor area (the "Project").
- D. Council District -9.
- E. Tax Map/Grid: 110E1 Parcel 2.
- F. Real Property Total Area 23.37 acres.
- G. Tax ID# 03-0203869.
- H. Location Located along the south east quadrant of the intersection of Crain Highway and Chew Road.
- I. Zoning AR.
- J. Planning Area 79 2013 Approved Subregion 6 Master Plan and SMA.

# II. <u>Introduction and Statement of Justification for the Election to Develop</u> Pursuant to the Prior SUBDIVISION REGULATIONS

Renewal Christian Center (the "Applicant," or "RCC"), by and through its legal counsel, Law Office of Midgett S. Parker, P.A., and the above referenced members of its Development Team, elect to have the Subject Application processed under the prior Subdivision Regulations pursuant to Sections 24-1901 to 24-1904 of the current Subdivision Regulations. Section 24-1904(b) requires the Applicant to "provide a statement of justification which shall explain why the Applicant has elected not to develop a specific property pursuant to the provisions" of the current Subdivision Regulations, and instead has chosen to utilize the prior Subdivision Regulations. The Applicant has elected to pursue the Preliminary Plan of Subdivision under the prior Subdivision Regulations because it acquired the Subject Property in 2008 and has already expended resources over the course of the past fifteen (15) years to reach this point in its journey to build a new house of worship on the Subject Property. As a religious entity after having navigated the land use process to obtain several of the approvals outlined below it would cause an unreasonable financial burden and delay to now pursue the preliminary plan of subdivision approval under the current Subdivision Regulations. Accordingly, the Applicant desires to have Case No. 4-23012 proceed under the prior Subdivision Regulations.

### III. DESCRIPTION OF CONFORMANCE WITH PRIOR SUBDIVISION REGULATIONS

In electing to proceed under the prior Subdivision Regulations, <u>Attachment 1</u> to this Statement of Justification identifies the applicable Sections of the prior Code and addresses how this Application meets those requirements.

### IV. PREVIOUS APPROVALS

The Applicant has obtained the previous approvals shown on **Attachment 2**:

### V. SERVING THE GREATER GOOD OF THE COMMUNITY

This facility, the new home for Renewal Christian Center, located at 6601 Chew Road, Upper Marlboro will be a beacon of light for all people. In addition to being a place of religious worship this building will serve the community by offering a number of programs for education, charity, and counseling all in accordance with the religious purposes of Renewal Christian Center. Renewal Christian Church will be a place offering prayer services, marriage counseling, youth encouragement programs, and more. The Pastor and congregation of Renewal Christian Center are excited to see this location being able to serve the community soon with positive events and catastrophic events such as recovery from a 3-year pandemic, community power outages, severe weather storms, and more. With the future improvement of 6601 Chew Road, Upper Marlboro, Maryland Renewal Christian Church will be a place of renewal, awakening, and refuge for all people of our community.

# VII. <u>CONCLUSION</u>

For all of the above stated reasons, Renewal Christian Center and the members of the Development Team respectfully elect that the referenced Preliminary Plan of Subdivision (Case No. 4-23027) advancing the development and use of the property as a religious house of worship with its associated signage, parking, landscaping, and other improvements to be reviewed under the prior Subdivision Regulations.

Date: 5/11/2024

Submitted By:

Law Office of Midgett S. Parker, P.A.

Midgett S. Parker, Esq., Founder/EO

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