

A Critique of the Proposed Planned Housing Design District

Charles Vidich

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Overview


- Impacts of the Proposed PHDD Zone on Mansfield
- Nine Key Assumptions behind the PHDD
- PHDD Vastly Over-Shoots Housing Demand
- Massive Increases in Housing have Sewer & Water Consequences
- Watershed & Riparian Buffer Protections Have not been Addressed
- Key Concerns with Floating Zones
- PHDD Lacks Purpose & Science based Analysis
- Flawed Seven Step Review & Approval Process
- Design Considerations



Impact of the Proposed Planned Housing Design District in Mansfield by Zone

Criteria and Consequences	PB	SER-HO	PVRA	R-20	R-90	RAR-90	Total
Minimum District Size	None	None	5 Acres	5 Acres	5 Acres	5 Acres	
Proposed Housing Type	Any	Any	SF, Duplex	Multiplex	Multiplex	SF, Duplex	
Maximum Density DU/Acre	15	15	8	8	8	10	
Located on Arterial/Collector	Yes	Yes	Yes	Yes	Yes	Yes	
Compact Residential in POCD	No	No	No	Yes	Yes	No	
Number of Qualifying Parcels*	7	1	2	5	11	213	239
Number of Qualifying Acres	55.16	4.36	145	52.32	161.79	5,455.83	5,874
Developable Acres @40% Discount	33.1	39	86.7	31.4	97.1	3,273.5	3,524
Dwelling Units Enabled	497	39	694	251	777	32,735	34,992
Bedrooms @2 bedrooms/DU	993	78	1,387	502	1,553	65,470	69,984
Water Needs @150 g/bedroom (g/day)	148,932	11,772	208,080	75,341	232,978	9,820,494	10,497,596
Sewage @30% Discount (g/day)	104,252	8,240	145,656	52,739	163,084	6,874,346	7,348,317

*Note: Excludes UCONN, Town of Mansfield and Lebus Trust Land Holdings




PHDD Zone Has the Following Dangerous Assumptions

- **Nine Key Assumptions**

1. Collector and Arterial Roads have Equal Capacity
2. 5 Acres is Sufficient for High Density in Non-Sewered Areas
3. Development can Occur on Developed or Vacant Land
4. Multi-Family can be developed in already developed Business Zones
5. Forest and Farmland can be developed for Multi-family
6. High Density is acceptable in Public Water Supply Watersheds
7. Eligible Parcels do not require minimum Road Frontage
8. No Limit on Number of Bedrooms
9. Water Efficiency Standards are not Factored into Design

PHDD Zoning Proposal Vastly Over- Shoots the Demand for Housing

- **Only, 2,760 Low Income Households in Mansfield**
 - Yet Proposed PHDD zone enables 34,992 Dwelling Units
 - PHDD Zone creates 12 times more housing than needed for Low Income Persons
- **Who is intended to be served by remaining dwelling units?**
 - $34,992 - 2,760 = 32,232$ dwelling units not Identified in Housing needs Assessment
 - Mansfield Affordable Housing Plan does not address housing needs for those not income constrained
 - What Drives the PHDD goal of increasing housing supply by 5 times over current supply?
 - 2022 U.S. Census estimates 7,134 Housing Units versus 34,992 proposed by PHDD

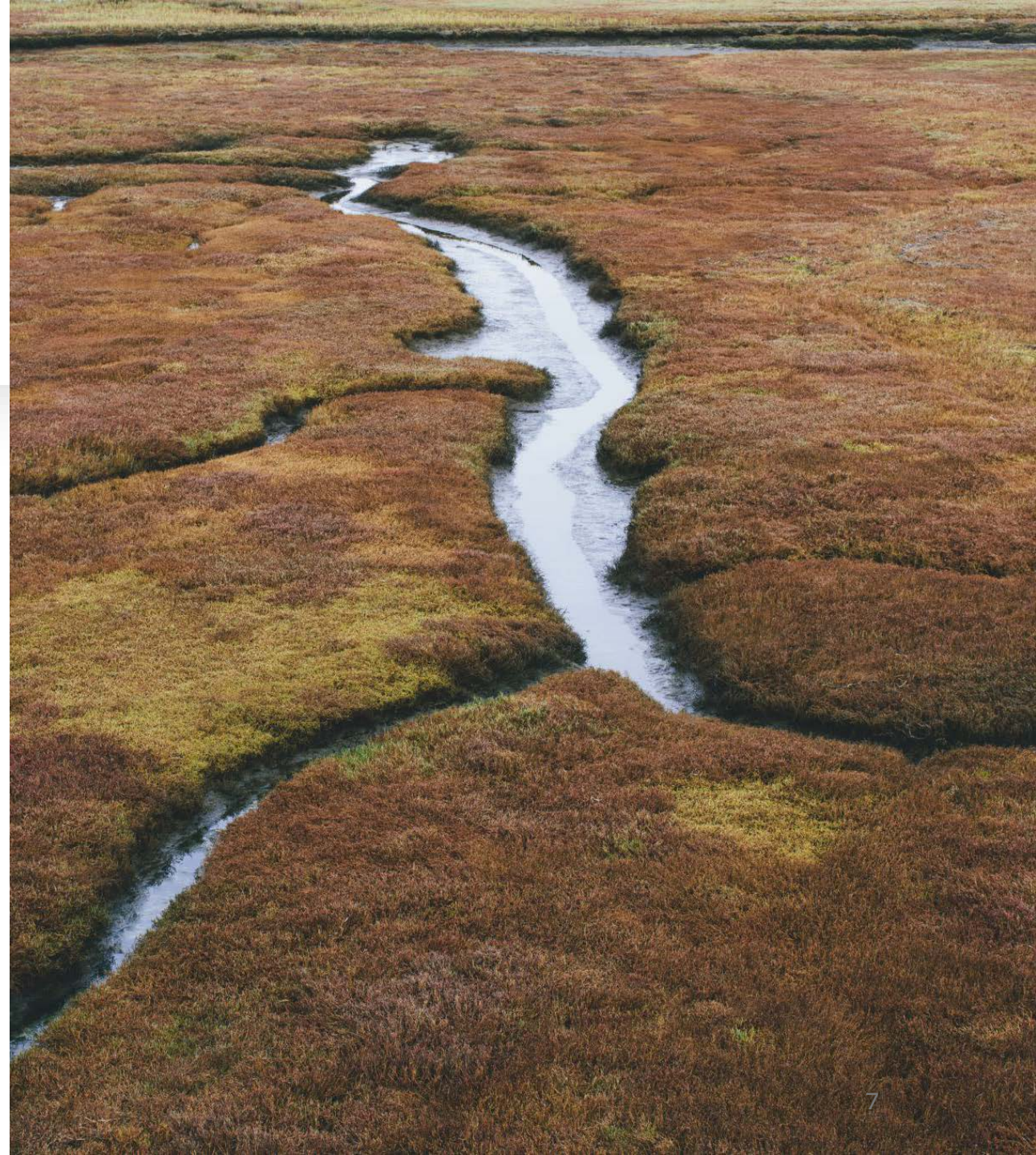


Massive Increase in Housing Supply has Sewer & Water Consequences

- Increased traffic on sub-standard collector roads
- Inadequate sewer capacity within Town/UCONN Sewer Agreement
 - 580,000 Gallon/Day Sewage allowance under the Agreement
 - PHDD proposal Enables About 1.7 million Gallons/Day of Sewer
 - Southern Mansfield Sewer impacts are about 14,280 Gallons/Day
 - PHDD Proposal is on a collision course with UCONN Sewer Agreement


Commission has Not Yet Addressed Riparian Buffer and Watershed Protection

- Conservation is integral Part of Plan of Conservation and Development
- Commission needs to Protect riparian and watershed resources at the Town Level
 - Lot Level Reviews result in “death of Natural Resources by a thousand cuts”
- PHDD Proposal Makes it Painfully Clear Water Resources are not Getting Protected



Key Issues with PHDD Floating Zone

- **Floating Zones are not Visible on Zoning Map**
 - Transparency Issue that Does Not Provide Forewarning of Development
- PHDD Floating Zone Violates 4 Planning Principles
 1. Multi-Family in Rural Areas violates Planning Principle #1
 - Concentrate density where sewer services exist
 2. Multi-Family on Farmland violates Planning Principle #2
 - Preserve Farmland & Avoid Cost of Sprawl
 3. Multi-Family on Collector Road violates Planning Principle #3
 - Focus development based on roadway capacities
 4. Multi-Family on Community Septic System violates Principle #4
 - Avoid developer owned & operated large subsurface systems



Lacks Purpose & Science Based Analysis

- **Lacks Purpose Statement:** Who is served by the PHDD zone?
 - No Reference to Housing Needs Assessment in Affordable Housing Plan
 - No Reference to 2,760 low-income households in Mansfield (< 80% AMI)
 - Where is the Section 8-30g analysis of need?
 - Housing renovation strategy not addressed
- **Lacks Coordination with Other Planning Efforts**
 - PHDD zoning proposal co-opts Northwest Mansfield Study
 - No effort to Focus Housing Growth as per Affordable Housing Plan
 - Downtown Storrs, Four Corners, North Eagleville Rd & Southern Mansfield
- **Lacks Science Based Analysis of Development Capacities**
 - Density proposals lack science-based analysis of capacity constraints

Flawed Seven Step Review & Approval Process

- PHDD Floating Zone creates a “Contract Zoning” Approach
- Step 1 Mixes a Developer Zone Change Proposal with Commission involvement in the Selection of the Changes
 - Abrogates Commission’s independent role as zoning legislators
 - Rather than serving as judges, commission members become developer’s partner
 - General Public may have little influence over Commission’s modification of the proposal
 - Creates a due process issue: may trigger a lawsuit.

Design Considerations

- **Design Considerations are NOT Performance Standards**
 - The Approach is based on “everything is negotiable”
- **Lacking Standards Adversely Impacts Abutting Property Owners**
 - Whose Knows where the Floating Zone will land?
 - Who knows what standards will be imposed?
 - Who knows if road, soil and sewer capacities will be adequate?
- **Ad-Hoc Development Replaces Land Use Planning**
 - Who decides when enough multi-family housing has been built?
 - Will Commission establish multi-family unit quotas?
 - Will Commission develop Performance Standards?

Conclusions

- PHDD Floating Zone Needs Significant Revisions
 - Special Permit Process is preferable or a more limited and transparent PHDD floating zone.
- Attempts to Solve Housing Problems that Don't Exist
- Doesn't address Many Sustainable Development Concerns
- Little Public Input Reflects Lack of Understanding of Impacts
- There is no precedent for this proposal anywhere in Connecticut