



Creating Great Communities For All
**Connecticut Chapter of the
American Planning Association**

March 11, 2022

**Testimony regarding
Proposed Bill No. 5429 (RAISED) AN ACT CONCERNING TRANSIT-ORIENTED
DEVELOPMENT**

CCAPA STRONGLY supports the intent of this bill to further Transit-oriented development (TOD) in the State of Connecticut, if not all of the bill's substantive requirements and possible inadvertent omissions. In summary, the proposal allows for the as-of-right development of housing with a minimum overall gross density of fifteen dwelling units per acre located within a half-mile radius of any passenger rail or commuter rail station or any bus rapid transit station. CCAPA's stance on TOD is clear: Connecticut municipalities with transit stations, particularly those that have experienced recent large state investment in these stations, have an obligation to increase housing opportunities around their station areas. TODs are a planning Best Practice that allow for compact, walkable communities that should include a mixture of residential and commercial components. Unfortunately, the bill as written, focuses only on the residential component and does not include a requirement for commercial uses and ignores this as a component of TODs entirely.

CCAPA briefly analyzed the approximately 60 bus or rail station areas throughout CT where this legislation may be applied, spanning a wide range of built environments (see chart below) with significant variation even within the same municipality. In some of these areas, exclusive residential developments may be appropriate and in other locations, a lack of a ground-floor commercial component would be detrimental and incongruous to historic commercial centers. These areas can be loosely categorized as follows:

Urban	Higher-Density Suburban	Lower-Density Suburban	Rural/Villages
Bridgeport	Bristol	Ansonia	Beacon Falls
New Haven (State)	Danbury	Berlin	Bethel
New Haven (Union)	East Norwalk	Branford	Cannondale/Wilton
Hartford	Fairfield Metro	Cheshire	Clinton

Merritt 7/Norwalk	Greenwich	Darien	Cos Cob
Stamford	Milford	Derby-Shelton	Greens Farms/Westport
Waterbury	Meriden	Fairfield Downtown	Guilford
	New Britain	Glenbrook/Stamford	Madison
	Norwalk	Manchester	Mystic
	Stratford	Naugatuck	New Canaan
	West Hartford	New London	Old Greenwich
	West Haven	Newington	Old Saybrook
		Noroton Heights/Darien	Plainville
		Southington	Redding
		Wallingford	Ridgefield
		Westport	Riverside/Greenwich
		Windsor	Rowayton/Norwalk
			Seymour
			Southport/Fairfield
			Springdale/Stamford
			Talmidge Hill/New Canaan
			Westbrook
			Wilton
			Windsor Locks

Given these vastly different environments, 15 units/acre is clearly an underwhelming residential development target for Urban and Higher-Density Suburban communities, while it may appropriately fit Suburban areas, but be slightly too high for Rural/Village areas - particularly where these village areas would likely dictate surface parking or where infill above existing development might be a better fit..

Planners are detail-oriented practitioners and we found the density/acre calculation a bit confusing. It seems to permit an “average” but it is unclear whether this is applied to a net area or gross area. This suggests being able to balance higher density closer to stations with a decrease in density to scale down to

other neighborhoods farther away. We suggest that this language may require more clarification and that an “area equivalent” option be provided that allows for a more linear application of a transit-area buffer instead of a radius since zoning/zones tend to follow train lines and main street areas from east to west or north to south instead of operating in a circular capacity.

Lastly, the bill proposes required Zoning Regulations related to TOD be adopted by municipalities by October 1, 2022 - a mere five (5) months after the close of the legislative session otherwise the proposed language takes effect. As with all matters of municipal planning and zoning in Connecticut, new requirements present local staff capacity challenges. This is too short a time-frame for substantive review of proposed land use regulations and design standards. It is CCAPA’s hope that the Model Design Code and Design Development sub-committee of Commission on Connecticut’s Development and Future (created by Public Act 21-29) could contribute some guidance for TOD areas and increasing in-fill housing density along “Main Street” areas that municipalities could use in enacting zoning regulations changes at the local level. The work of this Commission has not yet been completed, and is unlikely to be in place quickly enough for communities to review and adopt recommendations by October of this year.

CCAPA STRONGLY supports TOD and hopes that the Connecticut communities with transit stations recognize their good fortune in having this significant amenity, and look to potential TOD zoning as an economic development opportunity that not only improves housing choice and diversity but also improves the quality of life for their community members, particularly those who opt for transit as their primary mode of transportation - whether by choice or necessity. We want to recognize the great work that some communities have already done in this area and hope to be a resource to assist towns that may need more guidance.

WHO WE ARE

The Connecticut Chapter of the American Planning Association (CCAPA) has over 420 members who are governmental and consulting planners, land use attorneys, citizen planners, and other professionals engaged in planning and managing land use, economic development, housing, transportation, and conservation for local, regional, and State governments, private businesses and other entities. CCAPA has long been committed to assisting the legislature and State agencies with developing and furthering responsible growth management principles. The APA is an independent, not-for-profit, national educational organization that provides leadership in the development of vital communities.

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