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To: Third-party zoning and development review: Westfield proposal  
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Town of Trumbull  
Planning and Economic Development  
Stantec  
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**Reference:** **Third-party zoning and development review: Westfield proposal**

**Purpose**

Stantec has been hired by the Town of Trumbull's Planning and Economic Development staff to provide third-party review of the recent development and zoning amendment proposal for part of the Westfield Mall site. This memo summarizes Stantec's review, recommendations, and opinions.

**Placing the proposal in the context of national trends and comparable developments**

Driven by demographic shifts, emerging housing and lifestyle preferences, and fundamental changes in the retail industry, shopping malls across the country are struggling to maintain market share and are being forced to adapt, transform, or otherwise shutter in response. One common adaptation involves diversifying land uses in and around the mall to appeal to growing segments of the population interested in a more diverse and experiential retail and entertainment choice as well as the opportunity to live in a more urban setting and within walking distance of such destinations.

In this regard, the proposal for multifamily housing along the Main Street edge of the Westfield site is fully consistent with national trends amongst malls seeking to reinforce their bottom lines and maintain their important role in local communities and economies in the face of, in some cases, existential market challenges.

**On the proposed zoning amendment**

The motivation and themes underpinning the applicant's rezoning proposal and summarized in the amendment's purpose statement are fully consistent with approaches used by other owner/developers and/or their municipalities.

Language and commentary in the proposed amendment suggest a desire for flexibility and streamlined regulatory accommodation as the owner continues retrofitting the property in response to market trends in the future. This preference is common nationwide among developers transforming similarly large sites where redevelopment must be phased over many years (if not decades) and thus each increment will be subject to a unique mix of possibly quickly changing contemporaneous market forces not necessarily foreseeable today.

It would seem in the community's interest to grant this owner the tools necessary to preserve (if not strengthen) this property's substantial contribution to Trumbull's social and cultural life, economy, and tax base. However, too much flexibility and ambiguity could result in a disjointed series of phased developments that collectively fall short of the site's potential to continue creating substantial social, economic, and environmental value.

**Considering master plan requirement**

Stantec recommends the zoning amendment include a requirement that the owner produce a district-wide, Town-approved master plan before further development proposals will be accepted (this would not necessarily impact the process related to the current multifamily project under consideration, but this project should be incorporated into the plan). This plan would establish a cohesive framework for growth across the district, incorporating new and persisting uses and defining how future development projects fit in and

contribute to an overall vision. The planning process should include opportunities for public engagement and the resulting plan should consider and incorporate community vision, goals, and priorities.

As future development proposals emerge for parts of the district, the developer would be required to demonstrate how the new addition achieves the master plan's goals and integrates into its framework. If the master plan includes design standards – a worthy idea to help further ensure the built-out district is physically and experientially cohesive and of high design quality – the developer would have to demonstrate compliance here too.

Assuming new projects comply with the master plan and design standards to the Town's satisfaction, the developer could then be afforded a streamlined permitting process to allow nimble response to dynamic markets over the coming years and decades. The town might consider requiring updates to the plan at certain intervals or district development thresholds to help ensure it remains current with changes in community priorities, development typologies, mobility technologies, etc.

If more focused on establishing and complying with a master plan that addresses the district holistically, the zoning amendment could dispense with highly specific measures and regulations attempting to govern land use, program, site design, massing, bulk, etc. on a project-by-project basis. Instead, the master plan should establish the appropriate balance amongst these variables at the district-scale only.

#### **Framing fiscal and school impacts**

The submitted fiscal impact report suggests the proposed development will produce a positive fiscal impact of about \$602,399 annually. This finding is in keeping with trends across the country over the past several decades, namely that typical multifamily products have transitioned from a fiscal liability to a leading net revenue generator. This is especially true for luxury products like proposed here.

We understand members of the Trumbull community are particularly wary of substantial infusions of school age children and their potential impact on local school capacity and cost. Overall, there are currently several multifamily projects in various stages of proposal or development across Trumbull contributing about 660 units to the market,

Before concerns about impacts should be allowed to govern policy, however, the potential impact of these new children on local schools should be placed in Trumbull's current demographic enrollment contexts.

The developer's impact analysis benchmarks its projected ratio of children per unit to the Rutgers Center for Real Estate's 2006 survey of households in rental housing across New Jersey. The analysis projects the development will house about 37 children. However, the Rutgers study was updated in January of 2018 and found a considerable drop in the average number of children per 100 units in market-rate multifamily housing. According to the updated Rutgers study (which does not seem to have been applied to this impact analysis), newly built market-rate housing is likely to house considerably fewer children than older market-rate housing (product built before 2000 includes 25.9 children per 100 units; product built after 2000 includes 9.8 children per 100 units). This updated information suggests industry-standard analysis should result in a lower school age children projection than the developer provided. Put another way, the community should consider the developer's school age children projection a conservative estimate that substantially exceeds what more recent trends would suggest.

A 2018 Partnership for Strong Communities profile of Trumbull's demographics and housing stock reflects trends prevalent in comparable places across the country, namely that families are having fewer children and age cohorts with the fastest growth are 60 and above (in some cases, these are the only cohorts with any growth). Most pertinent to this discussion, Trumbull's data suggests school age population will drop by 15% between 2020 and 2030 (a reduction of about 1,200 children).

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Trumbull school enrollment data suggests this school age population decline has already begun taking hold. Projected enrollment for 2018-19 is 3.8% lower than in 2012-13 (a reduction of 257 students). To maintain current operational capacity and efficiency, the school system needs to replenish this shrinking student body over the coming decade. Given current demographic projections discussed above, the town will not organically achieve this balance without attracting additional school children through means such as new housing development.

We understand the community may have doubts about a developer's school impact projections. However, even when compared against the most conservative benchmarks available locally, the current development pipeline (this project included) will not replenish the number of school children projected demographic and enrollment trends indicate will leave the community by 2030. Taking Avalon as such a benchmark (conservatively because, unlike this project, it includes numerous three-bedroom units and youth-oriented amenities such as a playground, all features likely to attract a comparably higher proportion of families with children), its 340 units currently house 145 school age children, an average of about 43 children per 100 units. At this ratio, the approximately 660 market-rate units currently in the pipeline would gradually add about 284 children to the school system (assuming they all attended public school) as they are phased in over the next several years. Even if that number grew somewhat, it will not offset the hundreds (if not 1,000+) fewer children the town will house by 2030.