ALBEMARLE COUNTY PLANNING
STAFF REPORT SUMMARY

Proposal: SP202200029 Park Rd Manufactured Home Park (Crozet Mobile Home Community)	**Staff:** Kevin McCollum, Senior Planner
Planning Commission Public Hearing: June 27, 2023	**Board of Supervisors Hearing:** To be scheduled
Owner: Crozet MHC LLC	**Applicant:** Shimp Engineering – Justin Shimp and Kelsey Schlein, representing Crozet MHC LLC
Acreage: 14.94 acres	**Special Use Permit:** County Code §18-16.2.2 Manufactured Home Parks
TMP: 05600-00-00-04800 **Location:** 934 Agatha Dr	**By-right use:** R-6 Residential - 6 units/acre
Magisterial District: White Hall	**Conditions:** Yes **EC:** No
Proposal: Request for expansion of an existing 73-unit legally non-conforming manufactured home park. The proposal seeks to bring the property into conformance and to request an additional 14 units for a total of 87 units at a gross density of 5.82 dwelling units/acre. Associated with this request is a special exception (SE202300010) which seeks multiple waivers/variations to the manufactured home park supplemental regulations found in County Code §18-5.3. In addition, a request to approve an existing private water and sewage infrastructure as a central water and sewage system and to expand the existing private utility infrastructure to the 14 proposed lots has been included.	**Comp. Plan Designation:** Middle Density Residential – residential 6 – 12 units/acre (up to 18 units/acre considered with additional affordable housing units and/or small-scale housing types); supporting uses such as religious assembly, schools, childcare, institutional, commercial/retail, and other small-scale non-residential uses; Neighborhood Density Residential – residential 3-6 units/acre; supporting uses such as religious assembly, schools, childcare, institutional, commercial/retail, and other small-scale non-residential uses; and Green Systems – sensitive environmental features including stream buffers, floodplains, and steep slopes; privately-owned open space; natural areas, in the Crozet Master Plan.
DA (Development Area): Yes, Crozet	**Requested # of Dwelling Units:** 14
Character of Property: Existing non-conforming manufactured home park with 73 units. Some existing wooded area in the rear of the site.	**Use of Surrounding Properties:** Residential including mostly single-family detached homes and attached townhome units.
Positive Aspects: 1. The proposed use is consistent with the Comprehensive Plan. 2. 14 additional manufactured homes positively impacts affordable housing needs in Albemarle County.	**Concerns:** 1. Recreational amenities have not been provided. 2. There is no existing or proposed sidewalk along Park Rd.
Recommendation: Staff recommends approval of SP202200029 Park Rd Manufactured Home Park with conditions.	

STAFF PERSON: Kevin McCollum, Senior Planner
PLANNING COMMISSION: June 27, 2023
BOARD OF SUPERVISORS: To be scheduled

PETITION:

PROJECT: SP202200029 and SE202300010 Park Road Manufactured Home Park
MAGISTERIAL DISTRICT: White Hall
TAX MAP/PARCEL: 05600-00-00-04800
LOCATION: 934 Agatha Dr.
PROPOSAL: Special use permit and special exception for a manufactured home park.
PETITION: A request for a special use permit under Section 18-16.2.2 for a manufactured home park on a 14.94-acre parcel. The property is currently a non-conforming manufactured home park with 73 units. The proposal seeks to bring the property into conformance and to request an additional 14 units for a total of 87 units at a gross density of 5.82 dwelling units/acre. Associated with this request are several special exceptions to the manufactured home park special regulations outlined in Section 18-5.3. In addition, the proposal seeks to permit the existing private water and sewage infrastructure as a central water and sewage system and to expand the existing private utility infrastructure to the 14 proposed lots.
ZONING: R-6 Residential - 6 units/acre
ENTRANCE CORRIDOR: No
OVERLAY DISTRICT: Steep Slopes - Preserved
COMPREHENSIVE PLAN: Middle Density Residential – residential 6 – 12 units/acre (up to 18 units/acre considered with additional affordable housing units and/or small-scale housing types); supporting uses such as religious assembly, schools, childcare, institutional, commercial/retail, and other small-scale non-residential uses; Neighborhood Density Residential – residential 3-6 units/acre; supporting uses such as religious assembly, schools, childcare, institutional, commercial/retail, and other small-scale non-residential uses; and Green Systems – sensitive environmental features including stream buffers, floodplains, and steep slopes; privately-owned open space; natural areas, in the Crozet Master Plan.

CHARACTER OF SURROUNDING AREA:

The subject property is located at 934 Agatha Dr and fronts along Park Rd (Attachment 1 – Location Map and Existing Conditions). The surrounding area is primarily residential with single family detached homes and single family attached townhomes. Directly abutting the subject property to the east is Westhall which is zoned R-6 and PRD and contains townhomes and single-family detached homes. Across Park Rd. is Brookwood which is a R2 Residential and developed with single-family detached homes. To the northwest, abutting the property along Park Rd are additional R4 lots with single-family detached homes. To the north, abutting the property along the creek, is the Glenbrook development. This property is zoned R6 and contains single-family detached homes closest to the subject property, but also some attached townhome units as well. Lastly, to the northwest about a ¼ mile from the subject property along Park Rd is Crozet Park.

PLANNING AND ZONING HISTORY:

As described in the Application Narrative (Attachment 2), the Park Rd Manufactured Home Park is a non-conforming manufactured home park that pre-dates the Zoning Ordinance. This means that the property does not have an approved special use permit or site development plan. The non-conforming use has been allowed to continue and they have been allowed to replace existing homes when they need repair. However, any changes to the overall site layout or number of units requires additional approvals including a special use permit.

DETAILS OF THE PROPOSAL:

The applicant has requested a special use permit to bring the existing non-conforming manufactured home park into compliance and to add an additional 14 units to the property (Attachment 2 – Application Narrative). The concept plan shows the proposed layout of the additional units and physical improvements including an alleyway, an expanded cul-de-sac, additional parking, proposed stormwater management facilities, and proposed trail and access easements for the residents (Attachment 3 – Concept Plan).

To bring the existing manufactured home park into compliance, multiple waivers/modifications to the manufactured home park regulations are needed. The applicant has submitted a detailed Special Exception Application Matrix that provides justification and an analysis of each supplemental regulation that is being requested to be varied or waived (Attachment 4). Staff has provided commentary and recommendations for each of these special exceptions (Attachment 5). In addition, the Applicant has provided exhibits showing how the site can meet various site plan level details including minimum travelway widths, parking, easements, setbacks, etc. (Attachment 6 – Concept Plan and Exhibits). Lastly, the Applicant has included a request to permit the existing private water and sewage infrastructure as a central water and sewage system and to expand the existing private utility infrastructure to the 14 proposed lots (Attachment 7 – Private Central Water and Sewage Request). The site plan exhibit sheets mentioned above show the water and sewer connections to each lot.

COMMUNITY MEETING:

The required community meeting for the proposal was held at the Crozet Library on January 11, 2023 alongside the Crozet Community Advisory Committee meeting. There were many members of the public at this meeting including residents that currently live in the manufactured home park community. The applicant shared details and answered questions regarding the proposal to the members of the public who were present. Many were in support of the existing manufactured home park and the addition of the 14 units because it provides needed affordable housing to the community. There were some concerns raised about traffic along Park Rd and safe access to Crozet Park. Several residents echoed the need for a sidewalk leading to the park. When one resident was asked how they currently get to the park they responded, “you can walk there in the street.” Overall, the community had a few questions and concerns, but generally supported the proposal.

ANALYSIS OF THE SPECIAL USE PERMIT REQUEST:

Special Use Permits are evaluated under reasonable standards, based on zoning principles which include the proposal’s compliance with the Comprehensive Plan. Any impacts caused by the proposal may be addressed through conditions which must be reasonably related and roughly proportional to the impacts.

Section 33.8(A) states that the Commission, in making its recommendation, shall consider the following factors:

1. ***No substantial detriment. Whether the proposed special use will be a substantial detriment to adjacent parcels.***

   The project proposal is not anticipated to be a substantial detriment to adjacent parcels. The fourteen additional units will comply with setback regulations to adjacent properties and will be developed in accordance with all applicable current regulations. By bringing the site into compliance, the manufactured home park will have a site development plan and water protection ordinance/Virginia stormwater management protection plans. This will help ensure the proposed use has minimal impacts on adjacent parcels.

2. ***Character of the nearby area is unchanged. Whether the character of the adjacent parcels and the nearby area will be changed by the proposed special use.***

   The existing manufactured home park has been in existence since the 1970s. The proposal is to add 14 additional manufactured homes to the community. These additional units will be of similar size and scale to the existing manufactured homes. The lots will be accessed by all internal streets and alleyways. Therefore, it is not anticipated that the proposed use will change the character of adjacent parcels and nearby area.

3. Harmony. Whether the proposed special use will be in harmony with the purpose and intent of this chapter,

By bringing the site into compliance, the manufactured home park will better serve the public health, safety, and general welfare of the existing manufactured home park community, but also the surrounding community.

with the uses permitted by right in the district,

The proposed manufactured home park would not affect by-right uses in the district on this property or adjacent properties. The use itself is permitted by special use permit in the R-6 Zoning District.

with the regulations provided in Section 5 as applicable,

The proposed manufactured home park will be subject to the supplemental regulations in County Code §18-5.3 except for those that may be waived or modified. Those supplemental regulations are provided as Attachment 8. Waivers/modifications to address existing conditions within the community have been requested. Please see Attachment 5, the Applicant's special exception application matrix for a list of all requests. Staff has provided comments and recommendations for each of these special exceptions in Attachment 6.

Waivers/modifications have been requested to the following standards for manufactured home communities and are primarily to address existing conditions:

- Setbacks
- Building separation
- Screening
- Markers for lots
- Outdoor living and storage areas
- Street Design
- Parking
- Recreational Amenities

Section 5.1 of the Zoning Ordinance provides that any requirement of Section 5 may be modified or waived in an individual case as provided herein:

a. The Board of Supervisors may modify or waive any such requirement upon a finding that such requirement would not forward the purposes of this chapter or otherwise serve the public health, safety, or welfare or that a modified regulation would satisfy the purposes of this chapter to at least an equivalent degree as the specified requirement; and upon making any finding expressly required for the modification or waiver of a specific requirement; except that, in no case, shall such action constitute a modification or waiver of any applicable general regulation set forth in section 4 or any district regulation. In granting a modification or waiver, the commission may impose conditions as it deems necessary to protect the public health, safety, or welfare.

Please see Attachment 5 for a numbered list and analysis for each of the 23 waivers/modifications that have been proposed. Staff supports requests #1, 2, 8-15, and 20 as they have been proposed. Staff believes that these modified or waived regulations will satisfy the purpose of the Zoning Ordinance to at least an equivalent degree to each specified requirement.

Staff recommends requests #3-7, 16-19, 22, and 23 be approved with conditions. Staff believes that the proposed conditions are necessary to protect the public health, safety, or welfare of the residents and Albemarle County.

Staff does not recommend approval of request #21. Staff feels there is no sufficient finding that waiving the recreation requirements would serve the public health, safety, or welfare. Staff believes that waiving the requirement would not satisfy the purposes of the Zoning Ordinance to at least an equivalent degree. Based on 18-4.16, a total of 87 units would require a minimum of 17,400 sf of recreational area and two tot lots.

The Planning Commission is not required to make a recommendation on special exceptions. However, if the Planning Commission chooses to provide comments, staff will include those in the Transmittal Summary to the Board of Supervisors.

and with the public health, safety, and general welfare.

The public health, safety, and general welfare of the community are protected through the special use permit process, which assures that the proposed use is appropriate in the location requested. Transportation Planning, Zoning, Engineering, Building Inspections, VDOT, Fire-Rescue, ACSA, RWSA, and VDH have all reviewed this application and have provided no objections to the proposed use given some conditions.

If the special use permit is approved, the use cannot commence without the appropriate site development plans, water protection ordinance/Virginia stormwater management protection plans, and building permits. These processes will ensure that all state and county regulations, special use permit conditions, and all necessary building and fire inspections have been passed before the new manufactured homes can be built and moved into.

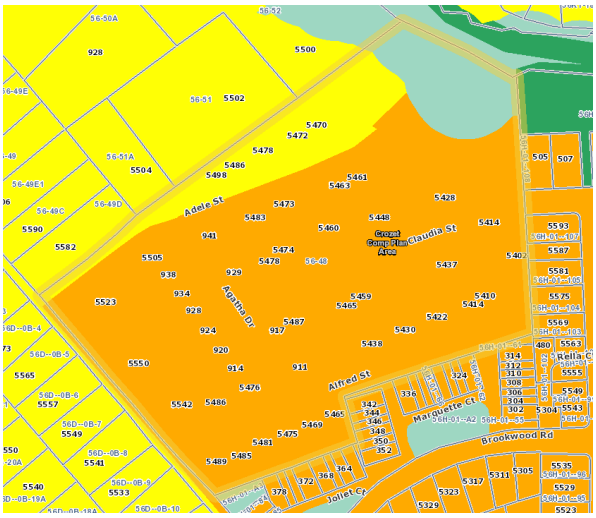
In addition to the special exceptions, the Applicant has also submitted a private central water and sewage system request (Attachment 7). The site plan sheets submitted with the concept plan show water and sewer connections to each lot. This request will be reviewed by Engineering and all applicable Staff and will go to the Board of Supervisors for approval.

4. Consistency with the Comprehensive Plan. Whether the proposed special use will be consistent with the Comprehensive Plan.

The Crozet Master Plan contained within the County's Comprehensive Plan designates the subject property for this proposal, TMP 56-48, for Middle Density Residential, Neighborhood Density Residential, and Green Systems land uses. The following are the land use descriptions for these land use categories:

a. Middle Density Residential – residential 6 – 12 units/acre (up to 18 units/acre considered with additional affordable housing units and/or small-scale housing types); supporting uses such as religious assembly, schools, childcare, institutional, commercial/retail, and other small-scale non-residential uses
b. Neighborhood Density Residential – residential 3-6 units/acre; supporting uses such as religious assembly, schools, childcare, institutional, commercial/retail, and other small-scale non-residential uses
c. Green Systems – sensitive environmental features including stream buffers, floodplains, and steep slopes; privately-owned open space; natural areas.

As you can see on Land Use Plan map to the right, a majority of the property is designated as Middle Density Residential (orange) with a smaller portion as Neighborhood Density Residential (yellow) and Green Systems (blue-ish green).



Staff believes that the proposed residential density and open spaces as shown on the conceptual plan are consistent with these land use recommendations. The proposal is for a total of 87 units on 14.94 acres at a gross density of 5.82 dwelling units per acre. This is consistent with the Comprehensive Plan recommendations and also the existing Zoning which permits densities up to 6 dwelling units per acre.

Staff also agrees that the proposal meets the guiding principle for land use in the Crozet Master Plan. This principle is to

support and strengthen Crozet's history as a vibrant community, while ensuring that new and infill development is compatible in scale and design and provides housing choices for all community members. The additional proposed units are compatible with the existing mobile home park and the application seeks to bring the entire manufactured home park into compliance in order to provide a housing option for the community.

Staff agrees with Transportation Planning's comments that the proposal could be strengthened by the addition of a sidewalk along Park Rd. The 2021 Crozet Master Plan identifies a sidewalk connection on Park Road from Crozet Park to Brookwood Road as the highest priority of the five Crozet sidewalk projects. This priority ranking is based on robust community input and the need for providing safe access to the park for residents of all ages and abilities. These additions would meet the Master Plan's guiding principle of creating a multimodal transportation network that is safe and accessible for all community members. Staff also believes the addition of street trees along Park Rd will meet the Master Plan's recommendations for improvements along Park Rd.

Staff agrees that the proposal is consistent with the following goals objectives of the Comprehensive Plan, as provided in the Application Narrative.

- Development Areas Objective 4: Use Development Area land efficiently to prevent premature expansion of the Development Areas
- Development Areas Strategy 5c: Encourage developers to build within the density range recommended in the Master Plans on infill sites
- Development Areas Objective 6: Promote infill and redevelopment that is compatible with surrounding neighborhoods and uses.
- Development Areas Objective 8: Preserve natural systems which are shown for preservation on Master Plan Land Use Plans
- Housing Objective 4: Provide for a variety of housing types for all income levels and help provide for increased density in the Development Areas

Neighborhood Model
Projects located within the Development Areas are typically reviewed for consistency with each of the Neighborhood Model Principles found in the Comprehensive Plan. Comments are provided below on relevant aspects of the Neighborhood Model.

Pedestrian Orientation	This principle is partially met. The street layout design is consistent with Comprehensive Plan Strategy #2b in that the development is laid out in a grid with blocks less than 600' in length. In addition, the proposal includes a trail and access easement for residents leading to Jonna St and the existing public trail. This easement provides additional pedestrian access to and from the site that did not previously exist. While Staff agrees that internal sidewalks may not be necessary given the existing conditions of the manufactured home park, Staff feels the application could be strengthened by a sidewalk along Park Rd. Strategy #2a is to continue to require and provide sidewalks and pedestrian paths in the Development Areas. The 2021 Crozet Master Plan identifies a sidewalk connection on Park Road from Crozet Park to Brookwood Road as the highest priority of the five Crozet sidewalk projects.
Mixture of Uses	This principle is not applicable. Strategy #2e of the Comprehensive Plan states that existing residential neighborhoods are expected to remain single use areas. The Park Rd Manufactured Home Park has been in existence for nearly 50 years and the current proposal is to add single family manufactured homes to the existing site.

Neighborhood Centers	This principle is not applicable. The Comprehensive Plan does not recommend this property as a Neighborhood Center.
Mixture of Housing Types and Affordability	This principle is met. The proposal supports Strategy #2g and provides a needed housing type and level of affordability to the community. Having additional housing types creates choices for residents. The Housing Policy Manager, Stacy Pethia, indicated in her review that this proposal positively impacts affordable housing needs in Albemarle County.
Relegated Parking	This principle is not met. The houses along Park Rd have parking relegated to the sides and rear, but for a majority of the manufactured home park parking is providing on the street and in the front of homes.
Interconnected Streets and Transportation Networks	This principle is partially met. The proposed trail and access easement provides additional connections for residents to walk to Jonna St and Eastern Ave. The application could be strengthened by providing additional pedestrian and/or bicycle connections along Park Rd. This would support Strategy #2j which provides that we should require vehicular, pedestrian, and bicycle connections in the Development Areas to enable pedestrians to walk easily to many destinations. As mentioned above this sidewalk is a top priority and would provide residents a safe and convenient route to Crozet Park.
Multimodal Transportation Opportunities	This principle is partially met. As stated above the application could be strengthened by a sidewalk and/or dedication of right of way along Park Rd. Strategy #2k states that new developments should provide for multi-modal transportation opportunities including for drivers, walkers, bicyclists, and transit users. The application currently provides one trailway and access easement to Jonna St and could be strengthened by providing a sidewalk along Park Rd as identified in the Crozet Master Plan.
Parks, Recreational Amenities, and Open Space	This principle is partially met. The concept plan shows a portion of this site as common open space and there is a proposed trail and access easement to Jonna St. However, the manufactured home park does not currently have nor is it proposed to have any recreational amenities. The applicant has requested a special exception to waive the recreational amenities. Strategy #2l is to require recreational amenities in residential developments. Parks, natural areas, recreational amenities, and other undeveloped open areas are essential to create a high quality of life in the Development Areas. A balance of natural areas and urban parks and plazas help provide variety and respite for residents. This application can be strengthened by committing to recreational spaces that meet Zoning Ordinance requirements.
Buildings and Spaces of Human Scale	This principle is not met. A lack of internal sidewalks and an abundance of street parking does not foster spaces of human scale.
Redevelopment	This principle is met. The application is consistent with Strategy #2o and promotes the re-use of existing areas to improve the functionality and appearance of underutilized sites. The proposal is an in-fill development that proposes 14 additional units on an existing site. The additional units provide additional affordable housing to the community, promote density, and efficient use of the development areas.
Respecting Terrain and Careful Grading and Re-grading of Terrain	This principle is met. The proposed units are within buildable areas on the property and are away from existing critical resources including the Water Protection Ordinance Buffer.

Clear Boundaries Between the Development Areas and the Rural Area	This principle is not applicable to the request. The subject property is located within the Crozet Development Area. No improvements or changes in use near any boundaries with the Rural Area are proposed.

IMPACTS ON SCHOOLS:

The applicable schools for the subject property include Crozet Elementary, Henley Middle, and Western Albemarle High. Page 28 of the ACPS Subdivision Yield Analysis Report provides estimates of how many students will be generated at each school level based on the 14 manufactured homes (mobile homes) that will be added to the site.

Crozet Elementary has a student yield ratio for manufactured homes (mobile homes) of 0.27. This means that 14 manufactured homes could potentially create an estimated 4 additional students (14 X 0.27 = 3.78) at Crozet Elementary. Henley Middle has a ratio of 0.24 for an additional 4 students (14 X 0.24 = 3.36). And Western Albemarle High School has a ratio of 0.12 for an additional 2 students (14 X 0.12 = 1.68).

The ACPS September 2021 Capacity vs. Enrollment report includes estimated enrollment for each school in future academic years in Appendix F of the report. The most recent version of this can be found online here. Based on these numbers, the additional students generated by these 14 additional manufactured homes will not cause any capacity issues at Crozet ES through academic year 2032/33, however, Henley MS will be over capacity by academic year 2027/28, and Western Albemarle HS will be over capacity by academic year 2024/25. While the application currently does not mitigate any impacts to these schools, Staff finds the number of students generated by the proposed use to be minimal.

SUMMARY:

Positive Aspects:

1. The proposed use is consistent with the Comprehensive Plan. The proposed density is consistent with the land use recommendations within the Crozet Master Plan and the R6 Zoning District regulations.
2. 14 additional manufactured homes positively impacts affordable housing needs in Albemarle County. The proposal provides a needed housing type and level of affordability to the community.

Concerns:

1. Recreational amenities have not been provided. The application includes a special exception application to waive the recreational amenity requirements.
2. There is no existing or proposed sidewalk along Park Rd.

RECOMMENDED ACTION:

Based on the findings contained in this staff report, staff recommends approval of the special use permit application SP202200029 Park Rd Manufactured Home Park with the following conditions and adjustments to the conceptual plan to provide recreational amenities

1. Development of the use must be in general accord with the conceptual plan titled “Crozet Mobile Home Community” drawn by Shimp Engineering and last dated 5/2/2023. To be in general accord with the Conceptual Plan, development must reflect the following major elements essential to the design of the development:
    a. Location of buildings;
    b. Location of parking areas;
    c. Location of roads, alleys, and cul-de-sacs; and
    d. Location of trail and access easement

Minor modifications to the plan that do not conflict with the elements above may be made to ensure compliance with the Zoning Ordinance.

2. Provide a sidewalk, planting strip, and street trees along Park Rd from Adelle Street to Alfred Street that meets all County and VDOT standards.
3. The manufactured home park must not exceed eighty-seven (87) manufactured homes.

POSSIBLE PLANNING COMMISSION MOTIONS

Special Use Permit

A. Should the Planning Commission **choose to recommend approval** of this special use permit:

Move to recommend approval of SP202200029 Park Rd Manufactured Home Park with conditions as stated in the staff report.

B. Should the Planning Commission **choose to recommend denial** of this special use permit:

Move to recommend denial of SP202200029 Park Rd Manufactured Home Park. *Should a commissioner motion to recommend denial, he or she should state the reason(s) for recommending denial.*

Special Exceptions
The Planning Commission is not required to make a recommendation on these Special Exceptions. However, if the Planning Commission chooses to provide comments on the special exceptions, staff will include those in the Transmittal Summary to the Board of Supervisors.

ATTACHMENTS

Attachment 1 – Location Map and Existing Conditions
Attachment 2 – Application Narrative
Attachment 3 – Concept Plan
Attachment 4 – Special Exception Application Matrix
Attachment 5 – Special Exception Application Matrix with Staff Comments and Recommendations
Attachment 6 – Concept Plan and Exhibits
Attachment 7 – Private Central Water and Sewage Request
Attachment 8 – County Code §18-5.3 Manufactured Home Parks