



Alachua County – Growth Management Staff Report

Application CPA-01-22

Staff Contact: Gerald L. Brewington/Jeff Hays

Staff Phone Number: 352-374-5249 ext. 2220

Planning Commission Hearing Date: April 20, 2022

Board of County Commissioners Transmittal Date: September 27, 2022

Board of County Commissioners Adoption Date: TBD

Land Use: Recreation

Zoning District: Planned Development

Parcel Numbers: 04314-000-000 and 04333-001-000

Acreage: Approximately 75.18

Requested Action: The applicant for this project is requesting a large-scale land use change from Recreation to Low-Density Residential with text amendments for a property (the former West End Golf Course) located on Newberry Road.

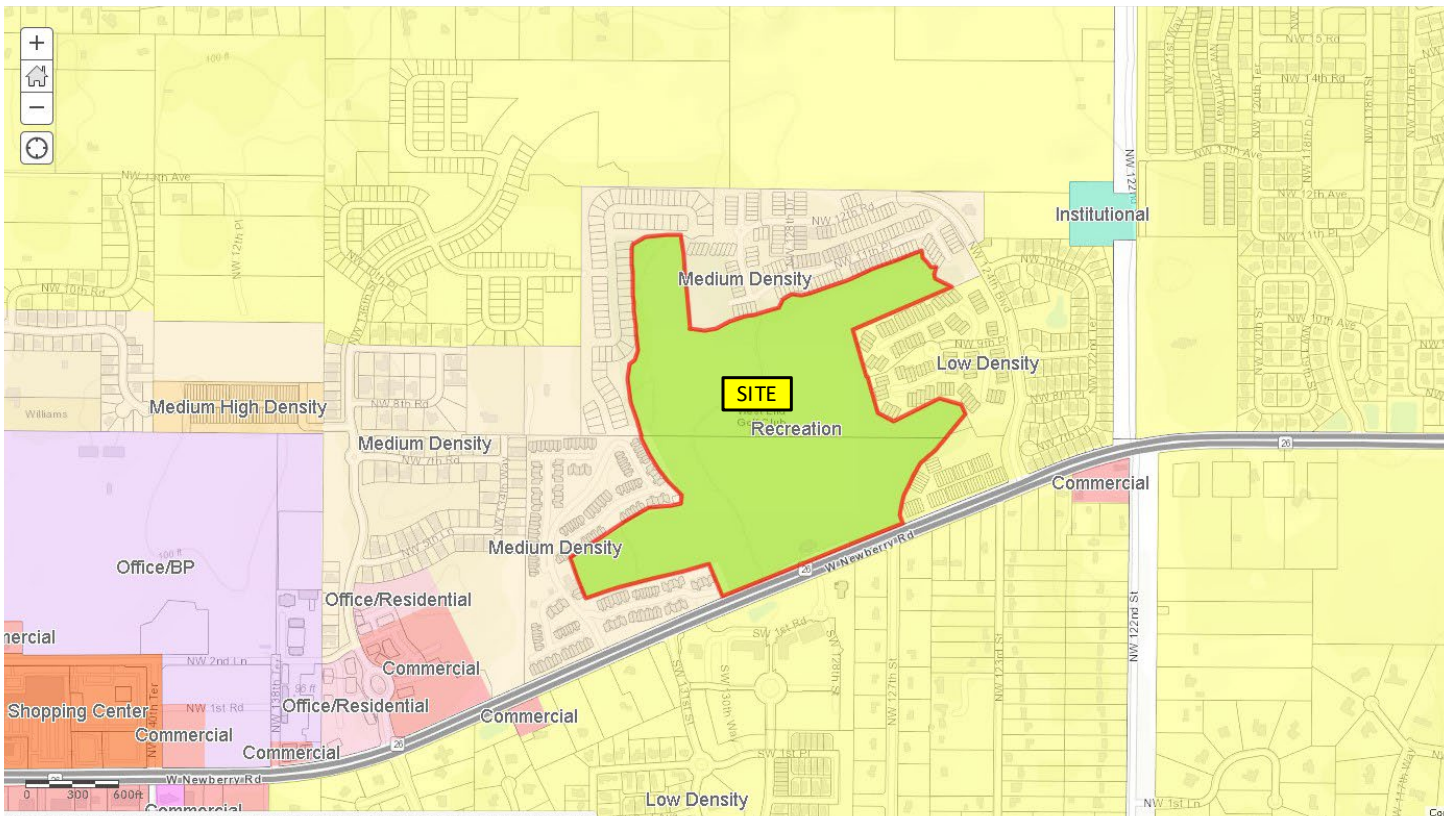
Applicant/Agent: JBrown Professionals

Staff Recommendation

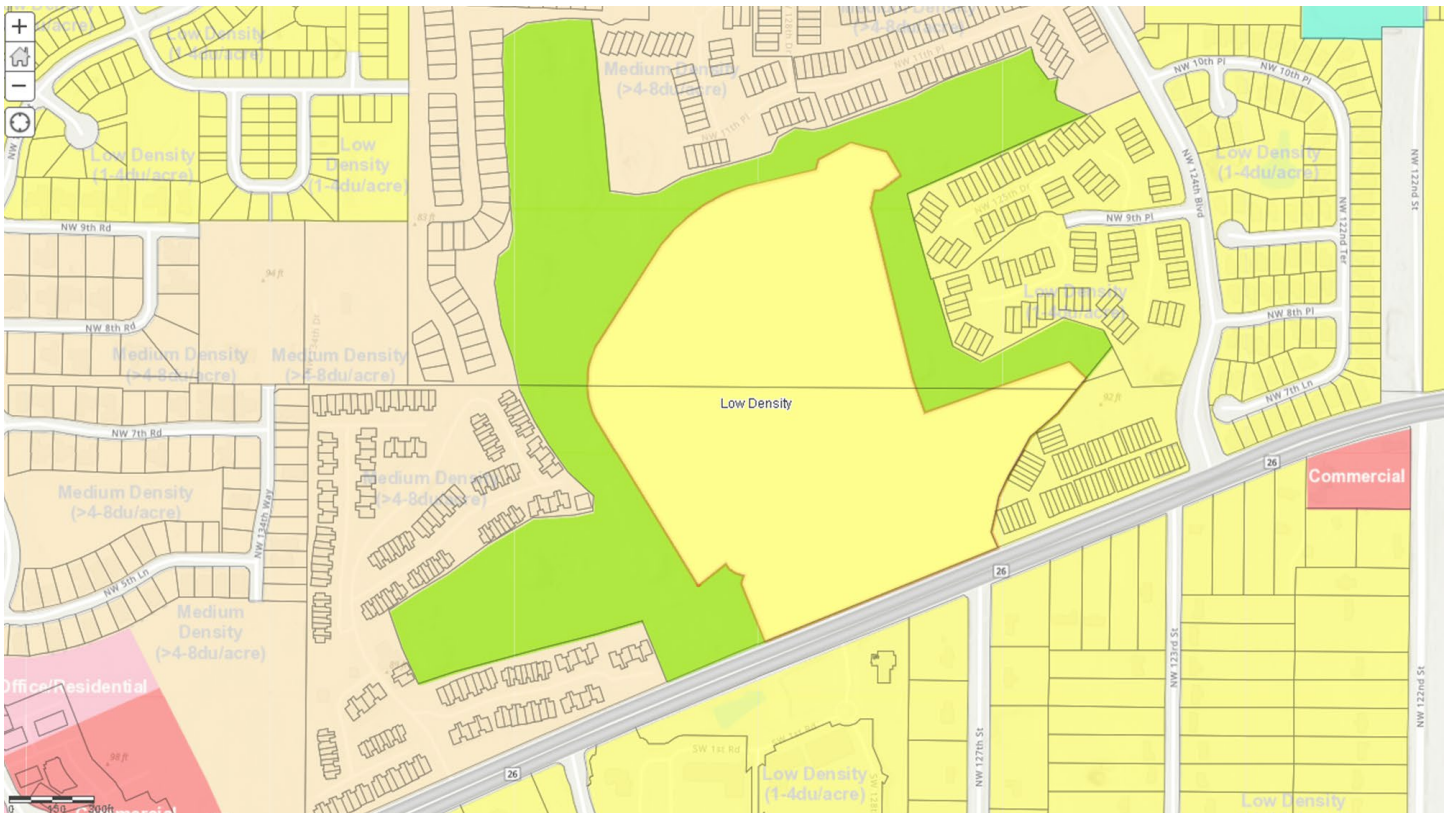
Staff recommends that the Local Planning Agency recommend that the BoCC **not** transmit the proposed Comprehensive Plan land use and text changes with the bases as noted in the staff report.

PC Recommendation

The Planning Commission recommended that the BoCC **not** transmit the proposed Comprehensive Plan land use and text changes with the bases as noted in the staff report. (6-0)



Existing Land Use Designation



Proposed Land Use Designation

Background

The property that is the subject of this Comprehensive Plan amendment is the golf course portion of the West End Planned Development (PD). The original West End PD was established via zoning item Z-2588 on February 19, 1981 with the golf course itself having been developed in the 1960's. This was prior to the adoption of the 1991 Alachua County Comprehensive Plan. At that time, the zoning master plan (ZMP) for the West End PD clearly showed the nature and extent of residential development that was intended to occur for those parcels surrounding the golf course. These included varying types of residential development, including townhomes, quadraplexes, apartments, and single family in a configuration that has remained essentially unchanged since its inception. These residential areas have been developed in numerous phases, with development and construction of the final phases still ongoing. With one exception, the residential portions of the West End PD have been developed without any provision for stubbed streets connecting into or through the golf course because of the nature of the central recreational use and its consistent designation as a golf course. The future land use on the golf course parcel is Recreation. The zoning is Planned Development (PD) and the associated master plan originally adopted in 1981 has been updated numerous times, most recently in 2017.

The golf course is approximately 75 acres and contains, in addition to the course itself, a driving range and clubhouse facilities with direct access to Newberry Road. While functioning as an open space and recreational amenity to the West End residents, the course has also historically been open to the public. It was eventually sold to owners not associated with the development activities at West End and it was decided, in 2019, to close the facility and put the property up for sale.

An initial redevelopment proposal for the golf course property was submitted to the Alachua County Office of Growth Management in 2020. This consisted of a land use change over the entire 75-acre parcel as well as a rezoning request that could, at maximum capacity, have accommodated 750 residential units and 292,500 square feet of non-residential space. This application was subsequently withdrawn on July 28, 2021.

The current application was submitted by the same applicant on December 22, 2021 and consisted of a single-family residential development only with associated Comprehensive Plan language that would have limited the subdivision to no more than 140 single family residential units. This was once again accompanied by associated Planned Development (PD) amendments. This application was subsequently modified on March 24, 2022 to reduce the permitted residential units to no more than 70 dwelling units. The applicant has decided to advance only the Comprehensive Plan map and text amendments to public hearing at this time.



Proposed Conceptual Master Plan (for illustrative purposes)

Comprehensive Plan Consistency

The future land use designation for these two parcels is Recreation. The requested future land use change is to Low-Density Residential (1-4 dwelling units per acre) for an approximately 38-acre portion of the site with the residual portion to remain Recreation with specific new related policies in the Comprehensive Plan. It should be noted that the Comprehensive Plan currently contains policies addressing recreation levels of service in the Recreation Element with the intent of providing sufficient resource-based and developed recreation for residents of the County. The Goals, Objectives and Policies found in the Recreation Element also address issues relating to development of new, publicly-owned recreation areas within the County. Although privately-owned recreation lands are not utilized in the calculation of the County's Recreation Level of Service, they are customarily part of the land use mix in many communities including Alachua County. The County recently adopted Future Land Use Element Objective 10.1 with associated policies specifically addressing both publicly and privately owned properties with a Recreation future land use designation.

10.0 Recreation Policies

- Objective 10.1** *The Recreation future land use category is established to provide for a range of private and public outdoor recreation activities in Alachua County, which shall be subject to the standards and policies contained in this section.*
- Policy 10.1.1** *Recreation land use is intended for a range of outdoor activities which may be resource-based or activity-based. Resource-based uses shall include those linked to natural resources as well as historic resources and sites.*
- Policy 10.1.2** *Areas designated for Recreation are identified on the Future Land Use Map. Recreation land use outside of the Urban Cluster shall be compatible in use and scale with the rural character of its location.*
- Policy 10.1.3** *Recreation land use may include customary complimentary structures and indoor uses such as indoor recreational facilities, clubhouses, and concessionaire facilities. The land development regulations shall address the scale, intensity and buffering of structures and outdoor improvements, including lighting and compatibility standards.*

The existing use of the property as a golf course and driving range is consistent with these policies. Additional outdoor recreation uses could also be considered consistent with these policies if they were to be proposed on the property in the future.

There are additional policies within the Plan that address how new urban residential development is meant to occur within the urban cluster. These provide a context for the new urban residential development that is being proposed in this application. The applicant is proposing no more than 70 single-family residential units on the portion of the parcels subject to the future land use map change from Recreation to Low-Density Residential, which is approximately 38 of the 75 total acres of the subject property, or approximately 1.84 dwelling units per acre. The Future Land Use Element is built upon a tiered approach to planning with the overall goal being to ‘encourage the orderly, harmonious and judicious use of land consistent with a set of guiding principles.’ These four principles are followed by a series of three implementing strategies. Amongst these strategies are the following:

- *Minimize the conversion of land from rural to urban uses by maximizing the efficient use of available urban infrastructure, while preserving environmentally sensitive areas (General Strategy #1)*

The intent behind this strategy is to maximize the use of land within the existing urban cluster to the greatest extent possible and to conserve undeveloped land in the areas beyond the cluster boundary. This is achieved in part by maximizing density within the cluster where urban services are available. The Newberry Road corridor is served by a state arterial roadway, has water and sewer service available and access to municipal services such as fire-rescue from a station located in the Jonesville area. Implementation of this strategy is therefore best served by providing greater densities within the cluster wherever possible. At less than 2 units per acre, the proposed development is not consistent with this Strategy.

- *Provide a range of urban residential densities with the highest densities located in or near urban activity centers, and lower densities located in outlying rural areas or areas of the County which have physical limitations to development.*

The West End PD is immediately adjacent to the Jonesville Activity Center. However, the applicant's proposal calls for development at the lower end of the density range for the land use (less than two (2) units per acre). The applicant's proposed Comprehensive Plan policies eliminate the potential of density bonuses inherent with development of a traditional neighborhood development (TND) as found in Chapter 407 of the Unified Land Development Code (ULDC). The proposal thus does not present the optimal use of land within the cluster as envisioned by this strategy.

Design of individual neighborhoods is addressed in General Strategy #3. Amongst the recommendations found is the promotion of interconnectivity between adjoining neighborhoods:

- *Create neighborhoods that are compact, connected to adjacent development, have limited mixed uses at centers, and have interconnected, mixed modal streets with pedestrian, bicycle, and transit friendly areas.*

This Strategy is meant to promote interconnectivity as a means of reducing congestion on arterial roadways by 1) promoting the use of alternate transportation methods such as bicycles and walking to access adjoining development and 2) promoting interconnectivity with surrounding development to access nearby neighborhood and commercial areas without impacting collector and arterial roadways, both by automobile and by bicycle and pedestrian routes. An example of this in the case of the West End PD is the provision for interconnectivity between West End and Arbor Greens to the west, which further connects to the Jonesville Business Park and the Steeplechase Shopping Center. Once fully connected, a vehicle can travel to the Publix at Steeplechase from West End without the need to access Newberry Road. This reduces vehicular trips on Newberry Road while, at the same time, providing a corridor for use by bicycles and other alternate forms of transportation employing safer neighborhood connectors. The proposed future land use

amendment and associated policies preclude the connection of this development to additional future roadway plans within the County's Comprehensive Plan north of the West End development.

The subject property does have a connection to the Tara West End development which connects to NW 124th Blvd. That connection is in such a location that it would not allow traffic to turn left onto NW 124th Blvd and therefore not have access to the larger roadway network. The lack of separate connection potential to the West End roadway network from this proposed development means that all vehicular trips will impact Newberry Road both east and west. This is not an optimal solution given current traffic conditions on this section of Newberry. Additionally, the proposed development would not have bicycle or pedestrian access to the surrounding developments. Thus, to walk or cycle to a house in the northern portion of West End, one would have to go out through Tara West End, then around NW 124th Blvd. This lack of multi-modal connections is not consistent with the Strategy as envisioned.

The encouraged method for areas incorporating residential uses is the traditional neighborhood development (TND). A TND mixes both residential and non-residential uses in a setting based on historic urban patterns. TND's are noted for the use of interconnected blocks, the promotion of denser residential densities and the provision for non-residential uses to serve the residents of the development but also capable of serving nearby development as well.

Policy 1.4.1 of the FLUE states that *the use of proven, innovative concepts for residential development such as TND and TOD are strongly encouraged*. This application proposes **Policy (a)** that specifically prohibits a TND on the subject property. **Objective 1.6** of the FLUE states that *TND's provide for interconnected, mixed-use development through specific site and design standards that create pedestrian and bicycle friendly communities, reduce per capita greenhouse gas emissions and vehicular trips on external roadways and provide development patterns that are transit supportive*. This objective is achieved through a series of identified methodologies focused primarily on the provision for interconnectivity and density. The proposed future land use amendment limits the maximum units to 70, under 2 units per acre in the developed area. The primary connection is at the existing golf course entrance across from Town of Tioga with a potential second means of ingress/egress being provided through Tara West End. The proposed plan would not reduce vehicular trips on an external roadway but rather is designed to use it (in this case Newberry Road) as a primary means of ingress and egress. The application materials do not make a strong case for the proposed development being pedestrian and bicycle friendly or transit supportive, consistent with this objective.

Policy 7.1.4 of the FLUE states that *Urban development shall provide, as part of the development, facilities necessary to accommodate interconnections, such as sidewalks, pedestrian paths, bicycle facilities, connecting roadways, and mass transit facilities needed to accommodate transportation mode shifts.* The Comprehensive Plan Amendment proposes 70 residential units with a main entrance from Newberry Road at the existing entry point for the golf course. As proposed, the subject property would have primary access to Newberry Road with a potential second means of ingress/egress occurring with a connection through the Tara West End development adjacent to the southeast. The applicant has proposed **Policy (b)** which states that there will not be additional external connectivity due to existing development patterns. Staff acknowledges that constraints exist limiting connection points due to existing development occurring consistent with the Planned Development over the last 40 years. Both the primary access point and the secondary ingress/egress would direct all vehicular trips onto Newberry Road, thereby adding to an already congested roadway segment. Policy 7.1.4 was adopted in part to address situations such as this by encouraging alternate means of accessing adjoining development including, in this case, major retail stores to the west.

Policies germane to this request can also be found within the Energy Element of the Plan. Specifically, **Policy 3.1.1** of the Energy Element states that Alachua County shall: *Promote energy efficient land use patterns through the policies of the Future Land Use Element, Transportation Mobility Element and this Element, including measures such as:*

- *(a) Mix of uses;*
- *(b) Transit supportive density;*
- *(c) Compact growth patterns;*
- *(d) Road connectivity and multimodal efficiency;*
- *(e) Pedestrian and transit oriented design techniques; and*
- *(f) Clustering techniques in the rural area.*

The objective of this policy is to promote ‘*energy-efficient land use patterns that reduce travel costs and encourage long-term carbon sequestration.*’ The Plan envisions compact development at densities to support mass/rapid transit whenever possible and interconnected to surrounding development. This is meant to reduce carbon emissions and greenhouse gases through design by reducing vehicular trips. By proposing a low-density development plan whose primary connection is Newberry Road, the applicant is diverging from the strategies envisioned in Policy 3.1.1 and instead providing a more standardized subdivision proposal that does not account for many of the measures encouraged in this Policy.

Allied with Policy 3.1.1 is **Policy 4.1.1** of the Energy Element which states that the County shall:

Implement transportation mobility and capital improvements plans that promote compact, mixed use development patterns in accordance with Policies 3.1.1 of this Element. Plans shall include funding for transportation modes that provide an alternative to single occupant automobiles.

The County's Transportation Mobility Plan and Capital Improvements Element include a transit route along Newberry Road all the way to the Jonesville Activity Center. A component of this proposal is the identified need to achieve residential densities sufficient to support continued operation of such an extension. The West End Golf Course property, if developed at the higher end of densities promoted through the TND standards found in the ULDC, would be far better poised to support such transit improvements along this important corridor. The applicant's proposal to provide density at less than 2 units/acre falls short of the policy's recommendation for a compact, mixed-use development.

Recreation levels of service (LOS) will not be exceeded should this request be approved. The Recreation LOS is a quantitative threshold for provision of recreation to the citizens of Alachua County. It paints an overall picture of the capacity to handle additional residential development within the County. As identified in the Comprehensive Plan, there is sufficient capacity at this time in both resource-based and activity-based recreation to handle any development proposed for the West End site. Siting of proposed new recreation areas in the County (either resource-based or activity-based) is a function of the Recreation Master Plan adopted and updated by the Board in conjunction with the City of Gainesville on a continual basis. Any provision of the West End site for use by the County would need to be analyzed in the context of the goals within the Recreation Master Plan to assure they are being met.

Levels of Service

The Alachua County Comprehensive Plan Capital Improvement Element requires that the public facilities and services needed to support development be available concurrent with the impacts of development and that issuance of a Certificate of Level of Service Compliance (CLSC) be a condition of all final development orders. 'Concurrent' shall mean that all adopted levels of service (LOS) standards shall be maintained or achieved within a specified timeframe. Per **Policy 1.2.4** of the Capital Improvements Element of the Alachua County Comprehensive Plan, LOS standards have been adopted for various types of public facilities.

Transportation

The subject application proposes a change to the future land use designation from Recreation to Residential Low Density (1-4 dwelling units per acre) for 38 acres of the former West End golf course. The following comments provide an analysis of the transportation impacts. Each of the following scenarios' daily trip generation is analyzed utilizing the 10th Edition of the Institute of Transportation Engineers' Trip Generation Handbook, as required in Alachua County's ULDC. The scenarios analyzed are:

- The most recent use as a golf course;
- Development of the site as only 70 single-family homes.

The subject property is approximately 75 acres and was most recently used as a golf course. The Recreation Future Land Use designation, coupled with the existing Planned Development zoning, limit what the land could be used for currently. To estimate the net new traffic impacts, it is necessary to analyze what is allowed under the existing entitlements. Table 1, below, shows the trip generation for an 18-hole golf course.

Table 1. Daily Trip Generation - 18 Hole Golf Course

ITE Code	Use	# of Units	Unit Type	Equation	Daily Trips
430	Golf Course	18	Holes	$T=34.93(X)-102.33$	526
				Total Daily Trips	526

The proposed Comprehensive Plan Amendment proposes a maximum of 70 single-family homes with daily trip generation as included in Table 2, below. This scenario would result in 223 net new daily trips as compared to the existing golf course.

Table 2. Daily Trip Generation - 140 Single Family Detached Units

ITE Code	Use	# of Units	Unit Type	Equation	Daily Trips
210	Single-family Detached	70	Units	$\ln(T)=0.92\ln(X)+2.71$	749
				Total Daily Trips	749
				Net New Daily Trips	223

Policy 1.1.6.11 requires that all Large-Scale Comprehensive Plan amendments that result in an increased transportation impact, such as this one, demonstrate that the Level of Service guidelines for the affected Urban Transportation Mobility District is achieved. The applicant has provided an analysis with their application. The applicant used the Gainesville MTPD travel demand model to determine how much of the project traffic would fall on each segment. The applicant has provided an analysis of the impacts on the Northwest Transportation Mobility District that shows that with the development there will still be capacity within the District at build-out. However, as proposed, the development has the potential to exacerbate existing congestion conditions on Newberry Road.

It should be noted that this analysis considers only vehicle traffic. One potential way to mitigate the increased vehicular traffic on Newberry Road is to provide additional vehicular connections to surrounding existing development or to implement Express Transit Service on Newberry Road. This project is included in the Capital Improvements Element and would potentially reduce the number new vehicular trips on Newberry Road. **Policy 1.3.8** of the Transportation Mobility Element requires that developments that generate more than 250 daily trips, such as would be allowed here, provide a minimum of two (2) functional access points. Exceptions are provided for in the Unified Land Development Code. Additionally, **Objective 1.1** recognizes the importance of interconnected developments and mixed use-developments in mitigating impacts on the existing transportation network. **Policy 1.1.3(a)** specifies that an interconnected network of roadways, transit and bicycle and pedestrian facilities are important in reducing the Vehicle Miles Traveled and per capita greenhouse gas emissions for new and existing development.

The subject property has frontage on Newberry Road. Additionally, the project will have a connection to the east through Tara West End to NW 124th Blvd. The majority of the rest of the site, as envisioned by the existing unified Planned Development zoning, is surrounded by existing single- and multi-family development with no opportunities for connection under the control of the applicant. As the existing Planned Development envisioned the subject property was to be used for recreation, with no view towards redevelopment, the surrounding developments were not required to provide for future connections. As a result, the applicant has indicated that there is no opportunity to provide for interconnected development. While this may be appropriate for a recreational use, as under the existing development scenario, the proposal to convert the recreational use to one that increases the impact on the surrounding transportation network without providing for new connections to surrounding development is inconsistent with Comprehensive Plan.

Water and Sewer

The site is served by central water and sewer service.

Drainage

Policy 1.2.4 of the Capital Improvements Element states that the minimum drainage LOS standard for non-residential development requires a floor elevation of one (1) foot above the 100-year/critical duration storm elevation or flood resistant construction. Any development proposed will be required to meet this standard.

Emergency Services

Policy 1.2.5 (a) states that the LOS standard for fire services within the urban cluster area is as follows:

- Initial unit response within 6 minutes for 80% of all responses within 12 months.
- Fire protection service level of ISO (Insurance Service Office) Class Protection 6 or better.
- Development shall provide adequate water supply for fire suppression and protection and fire service compliant fire connections.

Any development at this site will be required to meet this standard at the time of development plan approval.

Solid Waste

Policy 1.2.4 (C) states that the minimum level of service standard for solid waste disposal used for determining the availability of disposal capacity to accommodate demand generated by existing and new development, at a minimum, shall be 0.73 tons per person per year. Any development at this site will not cause these minimum LOS standards to be exceeded.

Public Schools

According to School Board staff, The Buchholz High School CSA currently accommodates an enrollment of 2,636 students and is operating above its permanent capacity of 2,006 student stations. At buildout, this project is projected to generate 6 high school students

The addition of 190 permanent student stations scheduled in the 2021-22 Five Year Work Plan will only partially relieve this deficiency. Consequently, the continued use of relocatables and/or redistricting or other operational alternatives can be anticipated.

The Fort Clarke Middle School CSA currently accommodates an enrollment of 955 students and is operating above its permanent capacity of 894 student stations. No additional capacity is programmed in the 2021-22 Five Year Work Plan. At buildout, this project is projected to generate 4 middle school students. The deficiencies must be addressed by redistricting, student reassignments, the use of relocatables or other operational alternatives.

The Southwest Alachua Elementary CSA currently accommodates 4,921 student, representing 98% utilization of the permanent elementary capacity including the opening of a new elementary school in August 2021. At buildout, this project is projected to generate 8 elementary school students.

Anticipated growth in this sector of the District can be expected to fully utilize and exceed capacity during the next 10 years. The continued use of relocatables and/or redistricting can be anticipated.

The Alachua County School Board is planning a comprehensive evaluation of capacity issues. A resolution to any capacity issues will not be clear until the comprehensive evaluation noted above has been completed. To facilitate a satisfactory and long term solutions, it is recommended that the County encourage developers to contribute to the expansion of educational facilities through "Capacity Enhancement Agreements" (refer to ILA Section 6.5).

Recreation

The County shall adopt and maintain, at a minimum, the following level of service standards for recreation of: (1) 0.5 acres of improved activity-based recreation sites per 1000 persons in the unincorporated area of Alachua County; (2) 5.0 acres of improved resource-based recreation sites per 1000 persons in the unincorporated area of Alachua County. The proposed land use change would allow for a maximum of 70 additional residential units. The County has sufficient acreage in each of these recreation-based categories to support the proposed development.

Environmental Comments

During decades of the property being utilized as a recreational golf course, various chemical components such as fertilizer, herbicide and pesticides were applied as part of typical grass and pest management practices. As part of future evaluations of the property, the applicant has proposed to conduct sufficient and appropriate soil and water testing to determine if, where and what types of chemicals may still reside within the property. The results of the soil and water sampling evaluation will be important to determine if and where remediation measures may be determined appropriate and necessary to remove the risks associated with potential soil, groundwater and surface water contamination.

Recreation Comments

The Parks & Open Space Department is in the process of updating the County Parks Master Plan. The draft Recreation Master Plan will show a demand for a County park in the vicinity of the subject property in order to close gaps.

Staff Recommendation

Staff recommends that the BoCC **not** transmit the proposed Comprehensive Plan land use and text amendments with the following bases:

The Future Land Use Element (FLUE) is built upon a tiered approach to planning with the overall goal being to ‘encourage the orderly, harmonious and judicious use of land consistent with a set of guiding principles.’ These four principles are followed by a series of three implementing strategies. Amongst these strategies are the following:

1. (General Strategy #1)

Minimize the conversion of land from rural to urban uses by maximizing the efficient use of available urban infrastructure, while preserving environmentally sensitive areas

The intent behind this strategy is to maximize the use of land within the existing urban cluster to the greatest extent possible to conserve undeveloped land in the areas beyond the cluster boundary. This is achieved in part by maximizing density within the cluster where urban services are available. The Newberry Road corridor is served by a state arterial roadway, has water and sewer service available and access to municipal services such as fire-rescue from a station located in the Jonesville area. Implementation of this strategy is therefore best served by providing greater densities within the cluster wherever possible. At less than 2 units per acre, the proposed development is not consistent with this Strategy.

2. (General Strategy #1, Bullet 3)

- *Provide a range of urban residential densities with the highest densities located in or near urban activity centers, and lower densities located in outlying rural areas or areas of the County which have physical limitations to development.*

The West End PD is immediately adjacent to the Jonesville Activity Center. However, the applicant’s proposal calls for development at the lower end of the density range for the land use (less than two (2) units per acre). The applicant’s proposed Comprehensive Plan policies eliminate the potential of density bonuses inherent with development of a traditional neighborhood development (TND) as found in Chapter 407 of the Unified Land Development Code (ULDC). The proposal thus does not present the optimal use of land within the cluster as envisioned by this strategy.

3. Design of individual neighborhoods is addressed in **General Strategy #3**. Amongst the recommendations found is the promotion of interconnectivity between adjoining neighborhoods:

- *Create neighborhoods that are compact, connected to adjacent development, have limited mixed uses at centers, and have interconnected, mixed modal streets with pedestrian, bicycle, and transit friendly areas.*

This Strategy is meant to promote interconnectivity as a means of reducing congestion on arterial roadways by 1) promoting the use of alternate transportation methods such as bicycles and walking to access adjoining development and 2) promoting interconnectivity with surrounding development to access nearby neighborhood and commercial areas without impacting collector and arterial roadways, both by automobile and by bicycle and pedestrian routes. An example of this in the case of West End PD is the provision for interconnectivity between West End and Arbor Greens to the west, which further connects to the Jonesville Business Park and the Steeplechase Shopping Center. Once fully connected, a vehicle can travel to the Publix at Steeplechase from West End without the need to access Newberry Road. This reduces vehicular trips on Newberry Road while, at the same time, providing a corridor for use by bicycles and other alternate forms of transportation employing safer neighborhood connectors. The proposed future land use amendment and associated policies preclude the connection of this development to additional future roadway plans within the County's Comprehensive Plan north of the West End development.

The subject property does have a connection to the Tara West End development which connects to NW 124th Blvd. That connection is in such a location that it would not allow traffic to turn left onto NW 124th Blvd and therefore not have access to the larger roadway network. The lack of separate connection potential to the West End roadway network from this proposed development means that all vehicular trips will impact Newberry Road both east and west. This is not an optimal solution given current traffic conditions on this section of Newberry. Additionally, the proposed development would not have bicycle or pedestrian access to the surrounding developments. Thus, to walk or cycle to a house in the northern portion of West End, one would have to go out through Tara West End, then around NW 124th Blvd. This lack of multi-modal connections is not consistent with the Strategy as envisioned.

The encouraged method for areas incorporating residential uses is the traditional neighborhood development (TND). A TND mixes both residential and non-residential uses in a setting based on historic urban patterns. TND's are noted for the use of interconnected blocks, the promotion of denser residential densities and the provision for non-residential uses to serve the residents of the development but also capable of serving nearby development as well.

4. Policy 1.4.1 of the Future Land Use Element (FLUE) states that *the use of proven, innovative concepts for residential development such as TND and TOD are strongly encouraged*. This application proposes **Policy (a)** that specifically prohibits a TND on the subject property. **Objective 1.6** of the FLUE states that *TND's provide for interconnected, mixed-use development through specific site and design standards that create pedestrian and bicycle friendly communities, reduce per capita greenhouse gas emissions and vehicular trips on external roadways and provide development patterns that are transit supportive*. This objective is achieved through a series of identified methodologies focused primarily on the provision for interconnectivity and density. The proposed future land use amendment limits the maximum units to 70, under 2 units per acre in the developed area. The primary connection is at the existing golf course entrance across from Town of Tioga with a potential second means of ingress/egress being provided through Tara West End. The proposed plan would not reduce vehicular trips on an external roadway but rather is designed to use it (in this case Newberry Road) as a primary means of ingress and egress. The application materials do not make a strong case for the proposed development being pedestrian and bicycle friendly or transit supportive, consistent with this objective.

5. Policy 7.1.4 of the FLUE states that *Urban development shall provide, as part of the development, facilities necessary to accommodate interconnections, such as sidewalks, pedestrian paths, bicycle facilities, connecting roadways, and mass transit facilities needed to accommodate transportation mode shifts*. The Comprehensive Plan Amendment proposes 70 residential units with a main entrance from Newberry Road at the existing entry point for the golf course. As proposed, the subject property would have primary access to Newberry Road with a potential second means of ingress/egress occurring with a connection through the Tara West End development adjacent to the southeast. The applicant has proposed **Policy (b)** which states that there will not be additional external connectivity due to existing development patterns. Staff acknowledges that constraints exist limiting connection points due to existing development occurring consistent with the Planned Development over the last 40 years. As shown in the conceptual site plan, both the primary access point and the secondary ingress/egress would direct all vehicular trips onto Newberry Road, thereby adding to an already congested roadway segment. Policy 7.1.4 was adopted in part to address situations such as this by encouraging alternate means of accessing adjoining development including, in this case, major retail stores to the west.

6. Policy 3.1.1 of the Energy Element states that Alachua County shall:
Promote energy efficient land use patterns through the policies of the Future Land Use Element, Transportation Mobility Element and this Element, including measures such as:

- *(a) Mix of uses;*

- *(b) Transit supportive density;*
- *(c) Compact growth patterns;*
- *(d) Road connectivity and multimodal efficiency;*
- *(e) Pedestrian and transit oriented design techniques; and*
- *(f) Clustering techniques in the rural area.*

The objective of this policy is to promote *‘energy-efficient land use patterns that reduce travel costs and encourage long-term carbon sequestration.’* The Plan envisions compact development at densities to support mass/rapid transit whenever possible and interconnected to surrounding development. This is meant to reduce carbon emissions and greenhouse gases through design by reducing vehicular trips. By proposing a low-density development plan whose primary connection is Newberry Road, the applicant is diverging from the strategies envisioned in Policy 3.1.1 and instead providing a more standardized subdivision proposal that does not account for many of the measures encouraged in this Policy.

7. Policy 4.1.1 of the Energy Element states that the County shall:

Implement transportation mobility and capital improvements plans that promote compact, mixed use development patterns in accordance with Policies 3.1.1 of this Element. Plans shall include funding for transportation modes that provide an alternative to single occupant automobiles.

The County’s Transportation Mobility Plan and Capital Improvements Element include a transit route along Newberry Road all the way to the Jonesville Activity Center. A component of this proposal is the identified need to achieve residential densities sufficient to support continued operation of such an extension. The West End Golf Course property, if developed at the higher end of densities promoted through the TND standards found in the ULDC, would be far better poised to support such transit improvements along this important corridor. The applicant’s proposal to provide density at less than 2 units/acre falls short of the policy’s recommendation for a compact, mixed-use development.