

POLK COUNTY DEVELOPMENT REVIEW COMMITTEE STAFF REPORT

DRC Date:	May 22, 2025	Level of Review:	Level 3 Review
PC Date:	July 9, 2025	Type:	Conditional Use Approval
BoCC Date:	N/A	Case Numbers:	LDCU-2025-8
		Case Name:	Mathews MH
Applicant:	Eugene David Mathews	Case Planner:	Kyle Rogus, Planner I

Request:	The applicant is requesting a Conditional Use (CU) approval for a mobile home to be located on ± 2.32 acres within a Residential Suburban land use district in the Green Swamp Polk City Special Protection Area.
Location:	The subject site is located off Pinecone Road, north of Interstate 4, south of Tom Costine Road E, east of US Highway 98, west of Moore Road, in Section 08, Township 27, Range 24.
Property Owners:	Eugene David Mathews and Rochelle Mathews
Parcel Size (Number):	± 2.32 acres Parcel IDs (#242708-000000-034110)
Future Land Use:	Residential Suburban-X (RSX)
Development Area:	Suburban Development Area (SDA)
Green Swamp:	Polk City Special Protection Area
Nearest Municipality:	N/A
DRC Recommendation:	Conditional Approval
Planning Commission Vote:	Pending Public Hearing

Location



2023 Satellite Photo



Summary of Analysis:

The applicant is requesting Conditional Use (CU) approval to locate a mobile home in a Residential Suburban (RS) land use district on an ± 2.32 acre lot. Chapter 2, Section 205, Table 2.1 (Use Table for Standard Land Use District) of the Land Development Code (LDC) instructs that the placement of mobile homes in the RS land use district requires Conditional Use approval via a Level 1 Review (via Staff only). To meet current development approval conditions, requests for mobile homes must adhere to the standards found in Chapter 3, Section 303 (*Mobile Home, Individual*) of the LDC.

The property is not located within a platted subdivision. There are 37 lots that share road frontage off Pinecone Road, 23 of which are single family residences, 8 mobile homes, and the remaining 6 are vacant land. LDC Section 303 allows administrative approval for the placement of a mobile home within un-platted lots if the abutting sides have existing mobile homes or if the subject parcel is greater than five acres. Since these standards cannot be met, the request must be approved by the Planning Commission in terms of the compatibility of individual mobile homes relative to the character of surrounding residential uses

Staff recommends approval. This mobile home request is compatible with the neighboring properties and surrounding area. The nearest mobile home to the subject site is approximately 370 feet to the west (Parcel No. 242707-160980-000160) in the Gibson Oaks Subdivision. The Gibson Oaks Subdivision is comprised of 44 total lots, 33 mobile homes, 5 single-family site-built residences, and 6 vacant lots. The Gibson Oaks Subdivision is 75 percent mobile home development. The 8 mobile homes within the surrounding area are located on flag lots with the minimum 25 feet road frontage requirement off Pinecone Road. While these lots have frontage off Pinecone Road, their access comes off Victoria Lane (Road No. 740802), a paved private road. Therefore, the proposed mobile home will be the first to access off Pinecone Road. The proposed mobile home is 28 by 68 (See Exhibit 5) bringing the total square footage to 1,904, which is similar in size to the surrounding dwelling units and will meet the required setbacks for the Land Use District. The proposed request is consistent with the LDC and Comprehensive Plan.

Findings of Fact

- *LDCU-2025-8 is a Conditional Use request to allow a mobile home on Parcel No. 242708-000000-034110 (+/- 2.32 acres) within a Residential Suburban (RS) land use district in the Suburban Development Area (SDA).*
- *The surrounding properties are within a Residential Suburban (RS) land use district and consist of single-family detached residences, mobile homes and vacant land.*
- *The subject property has approximately 132 feet of frontage along Pinecone Drive (Road No. 740801). Pinecone Drive (Road No. 740801) is a County-maintained, paved local road with a width of 20 feet.*
- *Section 204.A.3 of the LDC states, "The purpose of the RS district is to provide areas for suburban-density residential development to promote the proper transition of land from rural to urban uses. The RS district permits single-family dwelling units, family care homes, agricultural support uses, and community facilities."*

- *Per Table 2.2 of the LDC, RS land use mandates right-of-way setbacks for the primary structure of 20 feet, side setbacks for the primary structure of 10 feet, and rear setbacks for the primary structure of 15 feet.*
- *Chapter 553 of the Florida Statutes states that “Mobile Homes” means any residential unit constructed to standards promulgated by the United States Department of Housing and Urban Development. Mobile Homes are built to a separate standard than site-built homes and may be regulated differently than site-built and other manufactured homes. Site-built homes and other manufactured homes are built to standards set forth in Chapter 553 of Florida Statutes.*
- *POLICY 2.203-A2 of the Comprehensive Plan (Housing Element) states that “Mobile homes shall be allowed in all areas of the County designated for residential development subject to siting and design criteria consistent with the County’s Land Development Code*
- *According to Section 303 of the LDC, Individual Mobile Homes are allowed in all the following locations:*
 - 1. Within any registered mobile home park that has been approved by Polk County;*
 - 2. Within any platted residential subdivision that has been approved by Polk County as a mobile home subdivision;*
 - 3. Within any platted residential subdivision, or single platted phase within a multiple phased development, in which 50 percent or more of the developed lots contain mobile homes;*
 - 4. On any un-platted parcel in the A/RR district;*
 - 5. On any un-platted parcel that is five acres or larger in the RS district;*
 - 6. On any un-platted legal residential lot or parcel that is abutting vacant properties to all side and rear property lines;*
 - 7. On any un-platted parcel where at least one property abutting the subject property's side lot line has a mobile home;*
 - 8. On lots of record, including those within platted subdivisions, where at least one property abutting the subject property's side lot line has a mobile home. Within subdivisions, the abutting property must be within the plat; or,*
 - 9. On any residential lot or parcel where it is determined by the Planning Commission to be compatible with the established character of the surrounding area.*
- *Fire and EMS Response is from Polk County Fire Rescue Station 6 located at 8936 US Highway 98 North, Lakeland, FL 33809. This is located approximately 3.5 miles from the subject site with a response time of seven (7) to ten (10) minutes.*
- *Sheriff’s response to the site is served by the Northwest District located at 1045 W Wedgewood Estates Blvd, Lakeland, FL 33809. The recent response times were: Priority 1 Calls – 10:12 and Priority 2 Calls – 33:03.*

- *The subject property is located within the Northwest Regional water and wastewater service area and will utilize its own private well and septic tank.*
- *The development is zoned for Edgar L. Padgett Elementary, Lake Gibson Middle, and Lake Gibson Senior High. The site is 4.1 miles from Edgar L. Padgett Elementary; 3.7 miles from Lake Gibson Middle; and 3.2 miles from Lake Gibson Senior High.*
- *The subject parcel is not within one of the Wellhead-Protection Areas.*
- *The property is composed of 30.5 percent Samsula muck, 27.2 percent Hontoon muck, 22.1 percent Immokalee sand, and 20.1 percent Smyrna and Myakka fine sands.*
- *The property has approximately 1.65 acres (71 percent) of Freshwater Emergent wetlands and 1.53 acres (67 percent) of floodplains.*
- *According to the Florida Natural Areas Inventory Biodiversity Matrix, the site is not located within a one-mile radius of endangered species.*
- *According to a preliminary report from the Secretary of State's Department of Historical Resources Florida Master Site File, no archaeological sites are found within the parcel boundaries.*
- *There are no Citrus Connection stop within a one-mile radius of the subject parcel.*
- *The subject site has ingress and egress access through Pinecone Drive, a paved, local, County-maintained roadway. According to the 2025 Roadway Network Database, the nearest monitored roadway Old Polk City Road (4130E) has approximately 730 available PM Peak Hour trips; Old Polk City Road (4130W) has approximately 730 available PM Peak Hour trips. Old Polk City Road current Level-of-Service (LOS) is "B" with an adopted LOS standard of "B".*
- *The Comprehensive Plan defines Compatibility in Section 4.400 as "A condition in which land uses or conditions can coexist in relative proximity to each other in a stable fashion over time such that no use or condition is unduly negatively impacted directly or indirectly by another use or condition."*
- *This request has been reviewed for consistency with Section 111 and Section 303 of the LDC.*
- *This request has been reviewed for consistency with Section 2.102 GROWTH MANAGEMENT; SECTION 2.104 TRANSIT SUPPORTIVE DEVELOPMENT AREA (TSDA) AND POLICY 2.203-A2 HOUSING ELEMENT of the Comprehensive Plan.*

Development Review Committee Recommendation: Based on the information provided by the applicant, recent site visits, and the analysis conducted within this staff report, the Development Review Committee (DRC) finds that with the proposed conditions the request **IS COMPATIBLE** with the surrounding land uses and general character of the area and **IS CONSISTENT** with the Polk County Comprehensive Plan and Land Development Code. Therefore, the DRC recommends **APPROVAL of LDCU-2025-8.**

CONDITIONS OF APPROVAL

Based upon the findings of fact the Development Review Committee recommends APPROVAL of LDCU-2025-8 with the following Conditions:

1. LDCU-2025-8 is approved for no more than one (1) mobile home on Parcel No. 242708-000000-034110 as indicated in the site plan and staff report.

GENERAL NOTES

NOTE: This staff report was prepared without the benefit of testimony and evidence submitted by the public and other parties at a public hearing.

NOTE: Approval of this request shall not constitute a waiver or variance from any applicable development requirement unless specifically noted in the conditions of approval and consistent with the LDC.

NOTE: All written comments made in the application and subsequent submissions of information made during the application review process, which are on file with the Land Development Division, shall be considered to be binding upon the applicant, provided such comments are not at variance with the Comprehensive Plan, LDC or other development regulations in effect at the time of development.

NOTE: Approval of this request is only for Level 3 Review and only for those development decisions within the Planning Commissioners' jurisdiction. A Level 2 Review (engineered plans) will be required reflecting the standard conditions listed in Section 303 of the Land Development Code and the development standards listed in Chapter 7 of the Land Development Code. Upon completion of the Level 2 Process, building permits will be required for all structures in accordance with Chapter 553 of the Florida Statutes.

NOTE: Issuance of a development permit by the county does not in any way create any rights on the part of the applicant to obtain a permit from a state or federal agency and does not create any liability on the part of the county for issuance of the permit if the applicant fails to obtain requisite approvals or fulfill the obligations imposed by a state or federal agency or undertakes actions that result in a violation of state or federal law.

Surrounding Land Use Designations and Current Land Use Activity

The following table provides a reference point for notable and pertinent Future Land Use Map districts and existing land uses upon them.

Table 1

Northwest: Residential Suburban Single Family 2,464 sq. ft. 1.87 acres	North: Residential Suburban Single Family 1,962 sq. ft. 5.92 acres	Northeast: Residential Suburban Pasture 11.59 acres
West: Residential Suburban Single Family 2,464 sq. ft. 1.87 acres	Subject Property: Residential Suburban Residential Vacant Proposed 1,904 sq. ft. 2.32 acres	East: Residential Suburban Pasture 11.59 acres
Southwest: Residential Suburban Single Family 2,387 sq. ft. 0.94 acres	South: Residential Suburban Single Family 2,240 sq. ft. 2.04 acres	Southeast: Residential Suburban Pasture 11.59 acres

Source: Polk County Geographical Information System and site visit by County staff

The surrounding properties are within the Residential Suburban (RS) land use district and are occupied with single-family site-built residences, mobile homes, and vacant land. The Property Appraiser shows the parcel as vacant residential. There are no mobile homes in the immediate surrounding area of the subject property. The nearest mobile home is within the Gibson Oaks Subdivision directly to the west, where 75 percent of development are mobile homes. The Site plan submitted illustrates a double wide mobile home to be approximately 1,904 square feet.

Compatibility with the Surrounding Land Uses and Infrastructure:

This request is compatible with surrounding land uses and available infrastructure. The impact from a single mobile home is minimal. Given the improved standards for mobile home construction in recent years, the placement of a mobile home in this location is compatible with surrounding homes.

The LDC defines compatibility as “A condition in which land uses or conditions can coexist in relative proximity to each other in a stable fashion over time such that no use or condition is unduly negatively impacted directly or indirectly by another use or condition.”

The property is not located within a platted subdivision. There are 37 lots that share road frontage off Pinecone Road, 23 of which are single family residences, 8 mobile homes, and the remaining 6 are vacant land. The nearest mobile home to the subject site is approximately 370 feet to the west (Parcel No. 242707-160980-000160) in the Gibson Oaks Subdivision. The Gibson Oaks Subdivision is comprised of 44 total lots, 33 mobile homes, 5 single-family site-built residences, and 6 vacant lots. The Gibson Oaks Subdivision is 75 percent mobile home development. The 8 mobile homes within the surrounding area are located on flag lots with the minimum 25 feet road frontage requirement off Pinecone Road, but access comes off Victoria Lane (Road No. 740802), a paved private road. Therefore, the proposed mobile home will be the first to access off Pinecone Road. The proposed mobile home is 28 by 68 (See Exhibit 5) bringing the total square footage to 1,904, which is similar in size to the surrounding dwelling units. The existing single family homes range in similar size, from 1,962 square feet to 2,464 square feet.

Urban Services and Infrastructure Analysis:

The surrounding area has public safety service facilities that are operating within their adopted Level of Service (LOS) standard with no deficiencies. Placement of one mobile home will not trigger school concurrency requirements at Edgar L. Padgett Elementary, Lake Gibson Middle or Lake Gibson Senior High; however, Edgar L. Padgett Elementary is at 64% capacity, Lake Gibson Middle is currently operating at 82% capacity, and Lake Gibson Senior High is currently operating at 88% capacity. The subject property is located within the Northwest Regional water and wastewater service area and will utilize a private well and onsite septic tank.

Table 2, to follow, summarizes urban services and infrastructure for the surrounding area. Based upon the nature and size of the request, the proposal is not anticipated to create any significant demand on these services.

Table 2

Urban Services and Infrastructure Summary	
Schools (Zoned)	Edgar L. Padgett Elementary, Lake Gibson Middle, and Lake Gibson Senior High.
Sheriff	Sheriff's response to the site is served by the Northwest District located at 1045 W Wedgewood Estates Blvd, Lakeland, FL 33809. The recent response times were: Priority 1 Calls – 10:12 and Priority 2 Calls – 33:03.
Fire/EMS	Fire and EMS Response is from Polk County Fire Rescue Station 6 located at 8936 US Highway 98 North, Lakeland, FL 33809. This is located approximately 3.5 miles from the subject site with a response time of seven (7) to ten (10) minutes.
Water	Private Well
Sewer	Onsite Treatment System

Urban Services and Infrastructure Summary	
Transportation	The subject site has ingress and egress access through Pinecone Drive, a paved, local, County-maintained roadway. According to the 2025 Roadway Network Database, the nearest monitored roadway Old Polk City Road (4130E) has approximately 730 available PM Peak Hour trips; Old Polk City Road (4130W) has approximately 730 available PM Peak Hour trips. Old Polk City Road current Level-of-Service (LOS) is “B” with an adopted LOS standard of “B”.
Urban Sprawl	Site is located within the SDA and is not considered urban sprawl.

Table 3, below, identifies the anticipated impact of one mobile home on water and sewer services. The site has approximately 132 feet of frontage along Pinecone Road, using a private well and septic tank. The placement of one mobile home will have negligible impacts on the traffic on local roadways.

Table 3

Impact Analysis Summary Proposed Conditional Use (One Mobile Home)			
Potable Water Impact	Wastewater Impact	*AADT Impact	*PHT Impact
360 GPD	270 GPD	7.81 AADT	1.00 PHT
<i>Source: Polk County Concurrence Manual. The proposed development assumes that the potable water rate for a mobile home will consume 360 GPD and generate 270 GPD in wastewater. ITE 210-Single Family rate was used to determine similar AADT and PM Peak Hour rates for mobile homes. The AADT rate was 7.81 and the PM Peak Hour rates was 1.00 per unit.</i>			

Environmental Conditions Analysis:

There are no known conditions that should pose a threat to existing environmental resources based upon the proposed request (See Table 4, below). The parcel is approximately 2.32 acres total. Of the 2.32 acres, approximately 1.65 acres, or 71 percent, are considered Freshwater Emergent wetlands and 1.53 acres, or 67 percent, are within the 100-year flood zone. The remaining uplands are condensed to the west end of the property along Pinecone Road, comprised primarily of Smyrna and Myakka fine sands. The soil composition within the wetlands and flood zones are Immokalee sand, Samsula muck, and Hontoon muck. Per Chapter 6, Section 620 – Wetland Protection of the Land Development Code (LDC), an undisturbed vegetative buffer adjacent to surface waters with an average width of 25 feet and a minimum width of 15 feet shall be maintained for stormwater treatment and wildlife utilization measured perpendicularly from the OHWL or the jurisdictional wetland line, whichever is greater. It is easy to meet the 25 feet wetland buffer and the development setbacks in Chapter 2 of the LDC as the parcel spans over 720 feet in length. The proposed site plan places the double wide mobile home on the upland's, setback 50 feet from Pinecone Road and over 25 feet from the nearest jurisdictional wetland line. There are no further known conditions that should pose a threat to the existing environmental resources based upon the proposed request (See Table 4, below). The subject site is not located within any of the County's identified Wellhead-Protection Areas. The subject property is not located within a one-mile radius of endangered species, according to the Florida Natural Areas Inventory Biodiversity Matrix. The location of the mobile home is composed entirely of Smyrna and Myakka fine sand. The soil is not of such that would limit compliance with applicable Land Development Code regulations for the proposed use. The subject property is relatively flat with an elevation of 129 to 130 feet and contains no surface water features. In addition, the subject property is not located within a Historical Preservation

area. The subject site is outside any Airport Height Notification and In-Flight Visual Interference Zones.

Table 4

Environmental Conditions Summary	
Surface Water	There are no surface water ponds on the subject property. The subject property has contour elevations of 129 to 130 for the proposed location of the mobile home.
Wetlands/Floodplains	There are approximately 1.65 acres (71 percent) of Freshwater Emergent wetlands and 1.53 acres (67 percent) of floodplains on the property.
Soils	The property is composed of 30.5 percent Samsula muck, 27.2 percent Hontoon muck, 22.1 percent Immokalee sand, and 20.1 percent Smyrna and Myakka fine sands, which provides poor drainage, but the soil is not of such that would limit compliance with applicable LDC regulations for the proposed use.
Protected Species	The subject site is not located within one mile of any identified endangered species. (Source: Florida Natural Areas Inventory Biodiversity Matrix).
Wellfield Protection	The property is not located within any County Wellhead-Protection Areas.
Historical Preservation	The subject property contains no historical resources as monitored by the State of Florida's Division of Historical Resources.
Airports	The subject property is not located within any Airport Height Notification and In-Flight Visual Interference Zones.

The Planning Commission, in the review of development plans, shall consider the following factors listed in Table 5 in accordance with Section 906.D.7 of the Land Development Code.

Table 5

The Planning Commission, in the review of development plans, shall consider the following factors in accordance with Section 906.D.7 of the LDC:	
Whether the proposed development is consistent with all relevant requirements of this Code;	<i>Yes, this request is consistent with the LDC, specifically Section 303 which permits this use upon completion of a Level 3 Review. These can be found in the Findings of Fact on Pages 2 - 4 of the staff report.</i>
Whether the proposed development is consistent with all applicable policies of the Comprehensive Plan;	<i>Yes, this request is consistent with the Comprehensive Plan, as reviewed for consistency with SECTION 2.102 GROWTH MANAGEMENT and POLICY 2.203-A2 HOUSING ELEMENT of the Comprehensive Plan.</i>
Whether the proposed use is compatible with surrounding uses and the general character of the area, including such factors as density, height, bulk, scale, intensity, traffic, noise, and appearance; and	<i>Yes, the request is compatible with surrounding uses and the general character of the area. See Pages 5 & 6 of this staff report for data and analysis on surrounding uses and compatibility.</i>
How the concurrency requirements will be met if the development were built.	<i>This request will not require concurrency determinations from utilities, the school board, or TPO. The impact on public services can be found in the analysis found on Pages 6-8 of the Staff Report.</i>

Comments from other Agencies: None

Exhibits:

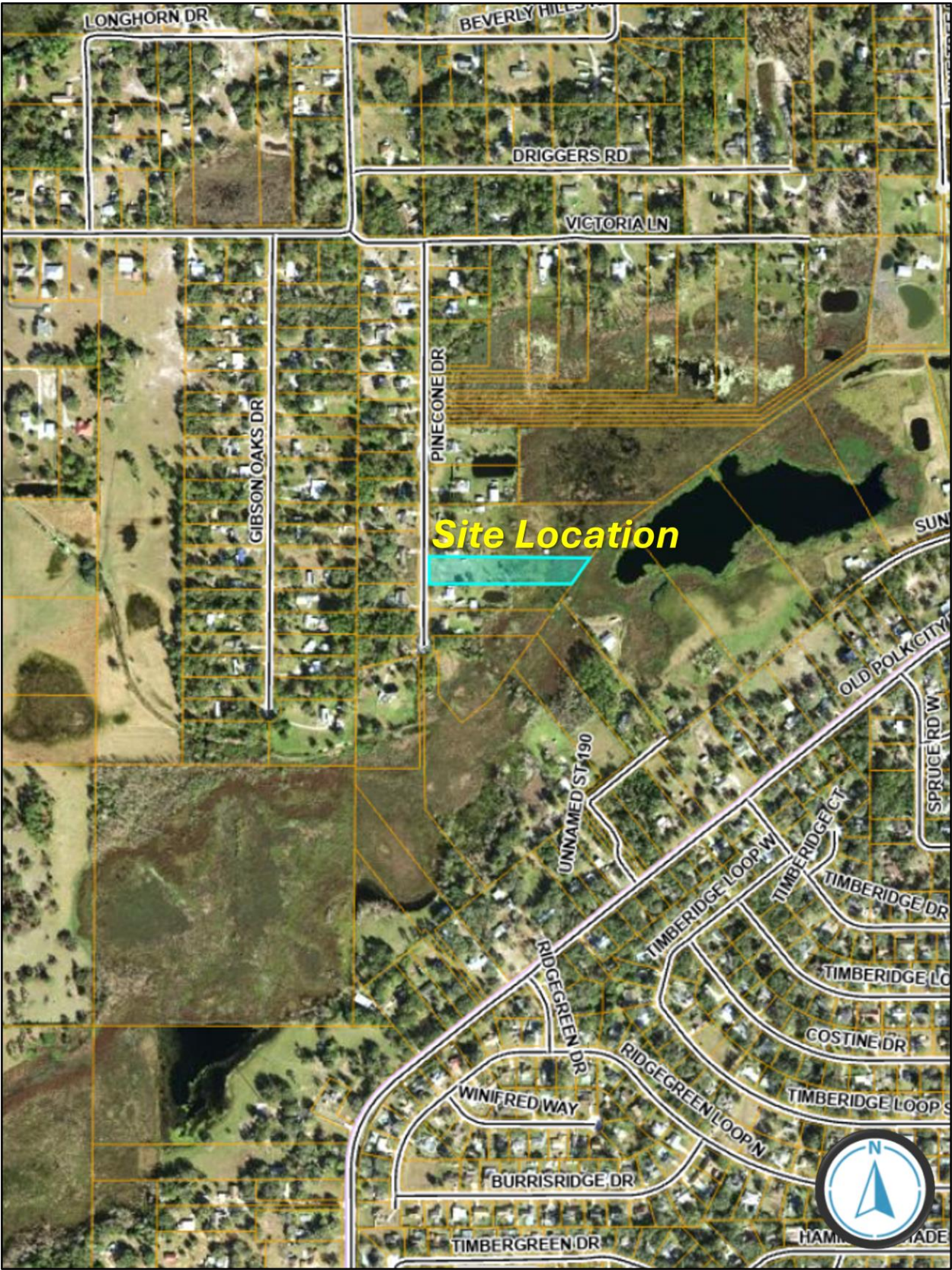
Exhibit 1	Location Map
Exhibit 2	Future Land Use Map
Exhibit 3	Aerial Imagery (context)
Exhibit 4	Aerial Imagery (close-up)
Exhibit 5	Site Plan
Exhibit 6	Mobile Home Floor Plan
Exhibit 7	Surrounding Mobile Homes



Location Map



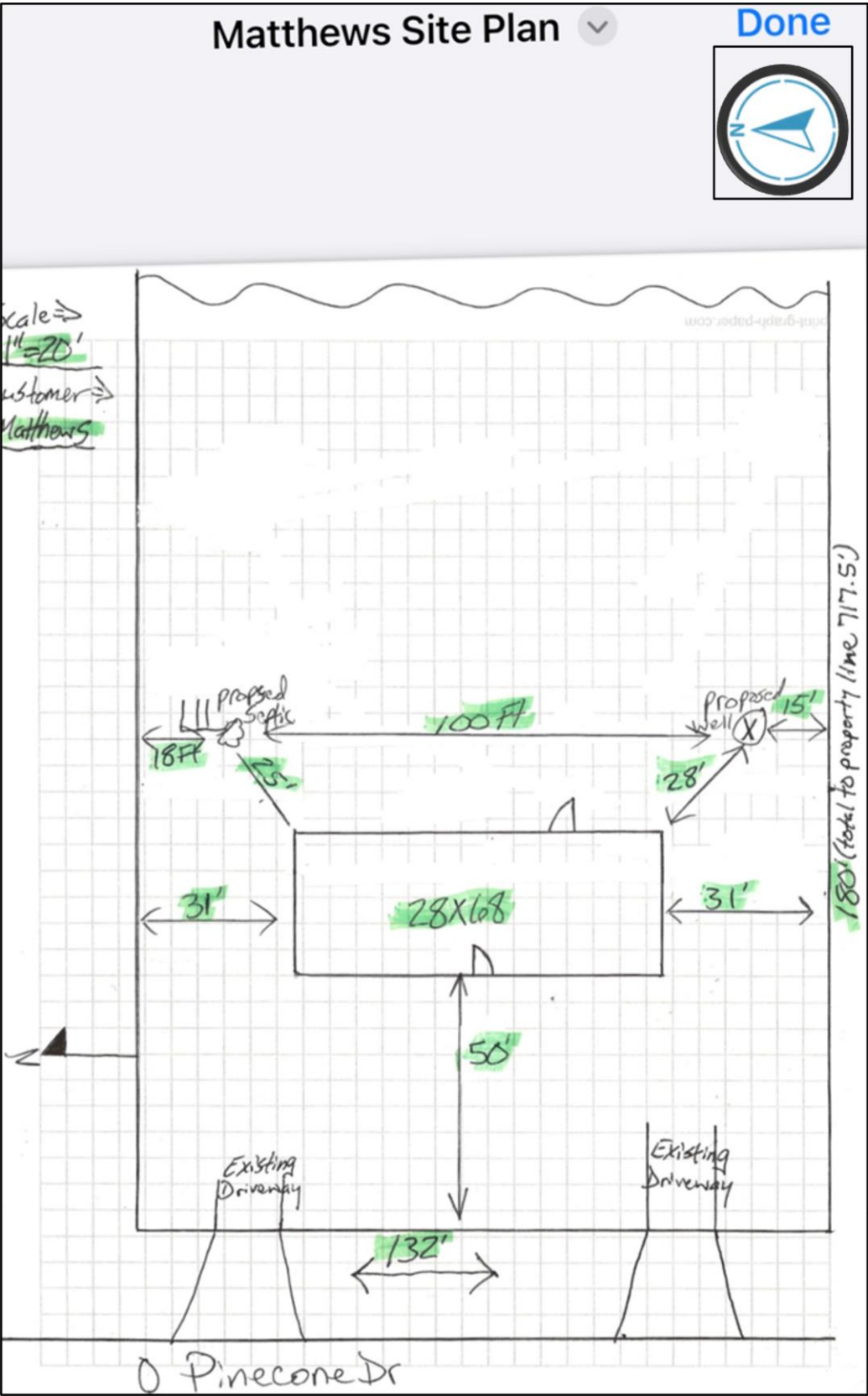
Future Land Use Map



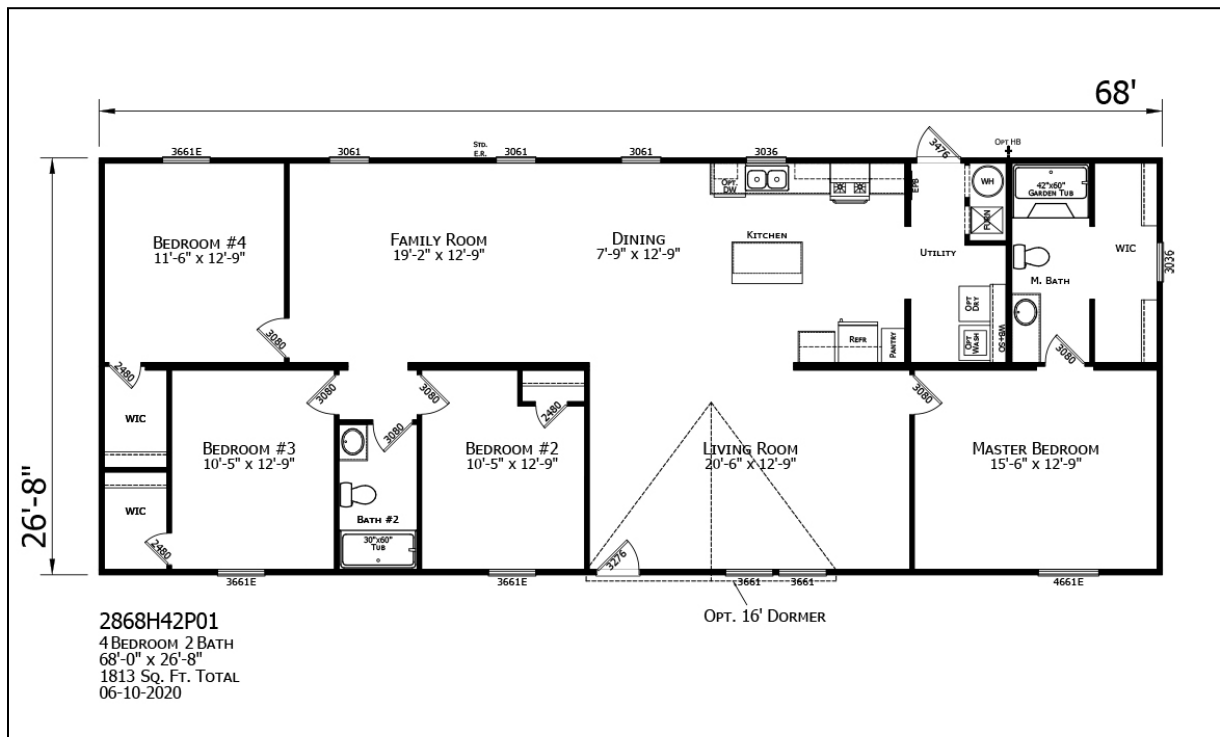
Aerial Imagery (Context)



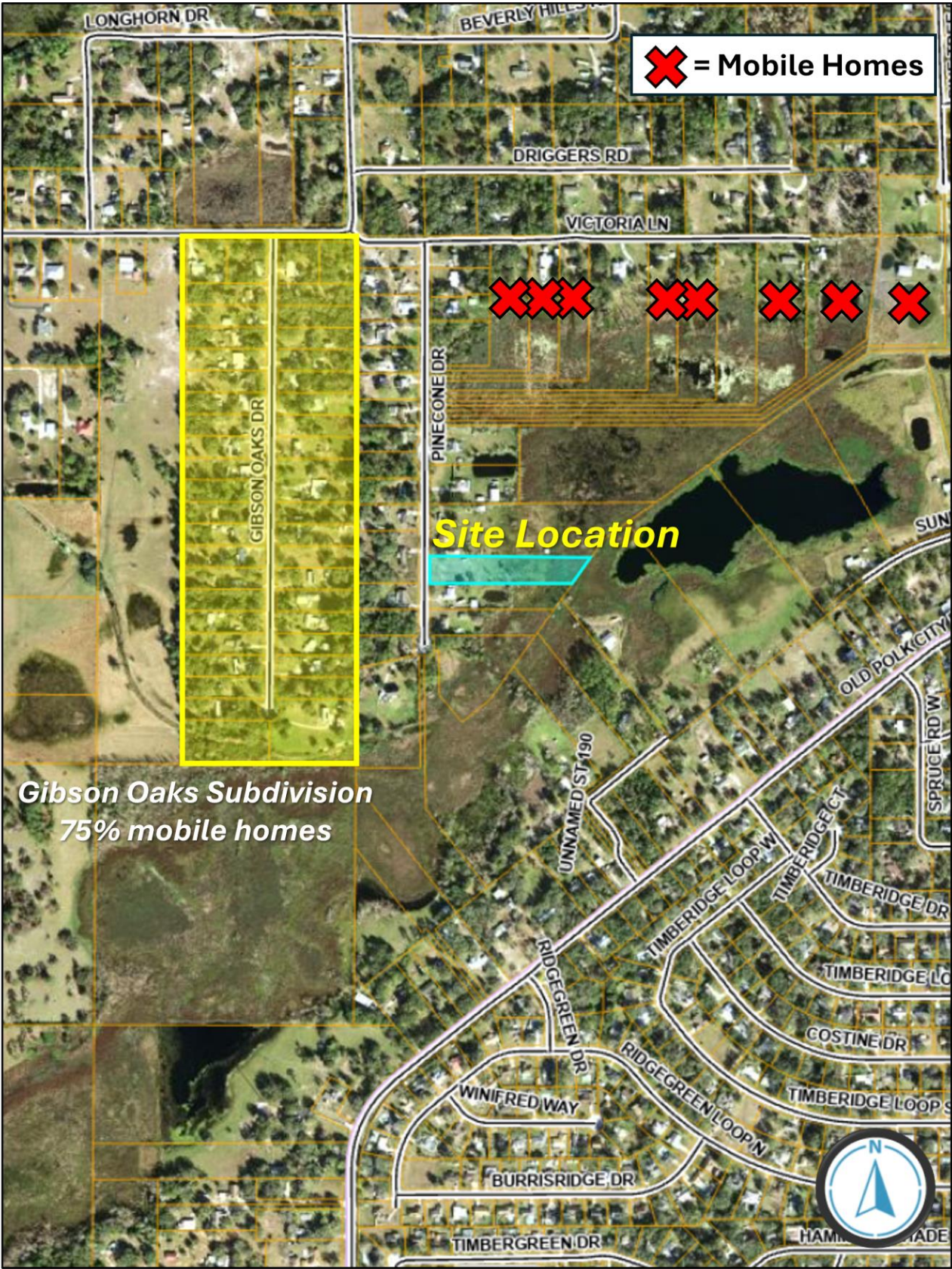
Aerial Imagery (Close-up)



Site Plan



Mobile Home Floor Plan



Surrounding Mobile Homes