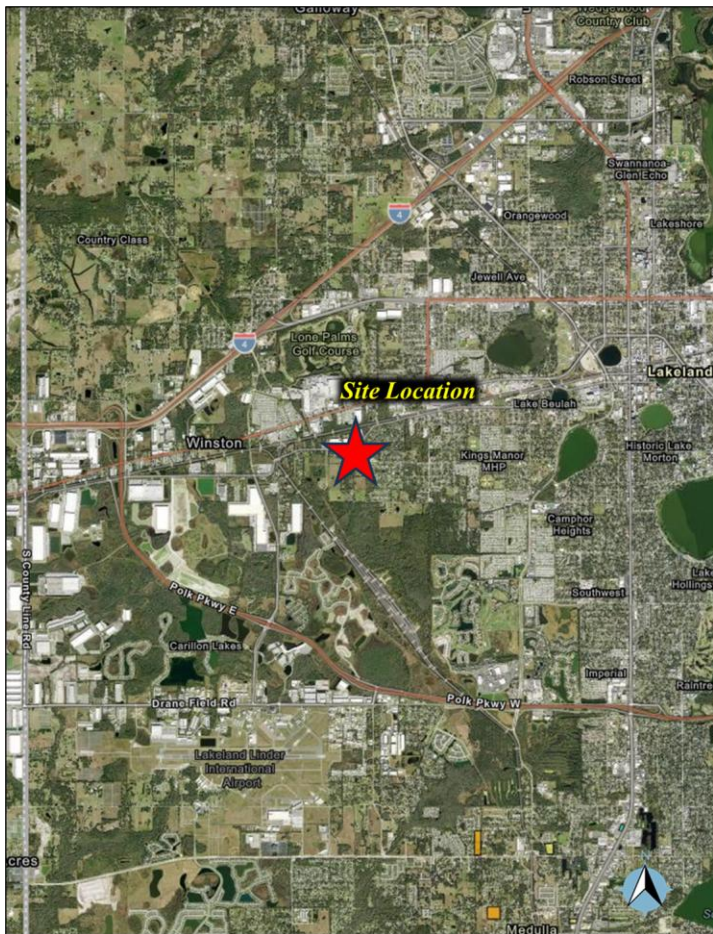


# POLK COUNTY DEVELOPMENT REVIEW COMMITTEE STAFF REPORT

<b>DRC Date:</b> January 29, 2026	<b>Level of Review:</b> Level 3 Review
<b>PC Date:</b> April 1, 2026	<b>Type:</b> Conditional Use
<b>BoCC Date:</b> N/A	<b>Case Numbers:</b> LDCU-2025-38
<b>Applicant:</b> Chad Brooker, Traditions Engineering	<b>Case Name:</b> Highlands Street Mobile Home Park
	<b>Case Planner:</b> Ian Nance, Principal Planner

<b>Request:</b>	The applicant is requesting Conditional Use approval for a 19-unit Mobile Home Park in a Residential Low-4 future land use district.
<b>Location:</b>	The subject property is located at 2730 West Highland Street, east of Wilkinson Road, west of Lebanon Road, south of New Tampa Highway, south and east of Lakeland in Section 22, Township 28, Range 23.
<b>Property Owners:</b>	Eric Brown Jr.
<b>Parcel Number (Size):</b>	232822-091000-000901 (+/- 4.93 acres)
<b>Future Land Use:</b>	Residential Low-4 (RL-4)
<b>Development Area:</b>	Transit Supportive Development Area (TSDA)
<b>Nearest Municipality:</b>	City of Lakeland
<b>DRC Recommendation:</b>	Approval
<b>Planning Commission Vote:</b>	Pending

**Site Location**



**Site Plan**



## Summary:

The applicant is requesting Conditional Use approval of a 19-unit Mobile Home Park (MHP) on +/- 4.93 acres within the Transit Supportive Development Area (TSDA) and Residential Low-4 (RL-4) future land use district near the city of Lakeland. Residential densities within these areas can reach 7 DU/AC. The proposed density is approximately 3.85 DU/AC. Though MHPs have multiple units under one ownership, the LDC requires minimum lot areas of 4,000 sq. ft. with two parking spaces for each unit. The mobile homes within the proposed MHP will be 2,160 sq. ft. on lot areas of 5,900 sq. ft. All parking and setback requirements will be met, and a passive recreation area exceeding an acre is located on the southern end of the site.

The subject site is currently developed with a single-family home. Individual Site-Built and Mobile Homes, as well as other MHPs and Mobile Home subdivisions, are in the immediate area. Industrial land uses are located to the northwest. Landscaping will be provided in accordance with LDC 720 standards. The site has frontage on West Highlands Street/Old Tampa Highway and within the city of Lakeland's utility service area. The city will provide potable water. The applicant is proposing a private septic system and will require a waiver for centralized wastewater connection pursuant to LDC Section 704.

Few environmental issues are present at this site, though soil limitations may preclude higher residential density without the availability of a wastewater connection. No wetlands or flood zones are onsite, though this property is mapped within the Itchepackesassa Creek strained basin, an area with a constricted stormwater outfall. A 100-year/24-hour stormwater pond will be required, and the applicant has provided for an easement on the site plan along the southern property line for County access to an existing ditch system.

Given the proximity of a school and its location with the TSDA, a sidewalk will be required along the frontage of the site. The site has direct access to a mass transit route, and the site is near US 92 and the Polk Parkway with quick access to I-4 and surrounding employment opportunities. Emergency services are available and operate at expected response levels, and two city parks are located within 1.5 miles of the site.

Staff recommends approval. The application, with the proposed Conditions of Approval, is consistent with Comprehensive Plan and LDC standards. The use is compatible with surrounding single-family development and similar housing types. This presents a redevelopment opportunity in an area intended for higher density near major transit, commerce, and employment centers.

## Findings of Fact

- *This is an applicant-initiated request for a Conditional Use approval of a 19-unit Mobile Home Park on approximately 4.93 acres with a density of 3.85 DU/AC.*
- *The property is designated Residential Low-4 (RL-4). According to LDC Table 2.2, standard RL-4 districts allow up to four dwelling units per upland acre.*
- *Land Development Code (LDC) Table 2.1 lists “Mobile Home Parks” as “C3” conditional uses in RL-4 land use districts.*
- *According to Table 2.2, the setbacks in RL-4 are as follows:*
  - Side: 7 ft.*
  - Rear: 10 ft.*
  - Urban Collector R/W: 35 ft.*
  - Accessory: 5 ft.*
- *The site is located in the Transit Supportive Development Area (TSDA), which is the area “where the availability of infrastructure and other community facilities and services, including, but not limited to mass transit and other transportation alternatives, utilities, public safety, recreational and educational services, promotes and supports the location of higher density and intensity compact, mixed use development,” according to POLICY 2.104-A1 of the Comprehensive Plan. The maximum density in RL within the TSDA is 7 DU/AC.*
- *Comprehensive Plan Policy 2.104-A5 requires development within the TSDA to:*
  - a. provide access to transit facilities;*
  - b. connect to centralized potable water and sanitary sewer systems;*
  - c. incorporate design features that promote healthy communities and green building practices, as established in Section 2.1251, Community Design, of this element;*
  - d. implement "Complete Street" and "Conservation Development" principles as established under Section 2.1251, Community Design, of this element;*
  - e. integrate pedestrian-oriented features, including sidewalks, trails or walkways into every development including appropriate pedestrian shelters or awnings;*
  - f. provide access to civic space, parks, green areas, and open space and other amenities;*
  - g. be supported by public safety (i.e., fire, EMS and law enforcement);*
  - h. have access to public schools;*
  - i. provide connectivity with adjacent uses within the TSDA and facilitate connectivity between the TSDA and other urban centers and the rural development areas.*

- j. *encourage the inclusion of a variety of housing choices, other than single-family detached homes, townhomes, condominiums, and residential units in mixed use buildings by establishing minimum densities that preclude the exclusive use of single-family detached units within designated areas as established in Policy 2.104-A7.*
- *Mobile Home Park is defined in LDC Chapter 10 as “A single tract of land under a single ownership where lots are offered for lease or rent for placement of three or more mobile homes or where mobile homes are offered for lease or rent, and which is developed with all necessary facilities and services for park residents in accordance with an approved site development plan.”*
  - *LDC Section 303, Mobile Home Parks, requires 4,000 square feet of upland area per mobile home space and 500 square feet of recreation area per dwelling unit. In no case shall any individual recreation area be less than 10,000 square feet in area.*
  - *LDC Section 303, Mobile Home Parks, requires 10 feet of space between neighboring units and two parking spaces per unit.*
  - *The property is zoned for Jesse Keene Elementary, Sleepy Hill Middle, and Kathleen High School.*
  - *Fire/EMS responses to this project are from Polk County Fire Rescue Station 24, the Winston Creek Station, located at 1140 North Galloway Road, Lakeland.*
  - *The nearest Sheriff’s substation is the Northwest Command Center at 1045 Wedgewood Estates Boulevard, Lakeland.*
  - *The site is located within the city of Lakeland’s Utility Service Area for potable water and wastewater.*
  - *The site has frontage on West Highland Street (Road No. 832214), an Urban Collector Roadway.*
  - *Two parks within the city of Lakeland – West Side Park and the Southwest Complex – are located to the east of the site.*
  - *There are no wetlands and floodplains on and near the site. It is located within the Itchepackesassa Creek stressed basin.*
  - *The developable portions of the site are comprised of all sandy soils: Pomona, and Smyrna & Myakka Fine Sands, according to the U.S. Department of Agriculture, Soil Conservation Service, Polk County Survey.*
  - *According to Polk County Endangered Habitat Maps, the proposed MHP is not located within a one-mile radius of an endangered species sighting. (Source: Florida Natural Areas Inventory, 2002, 2006 & 2011).*
  - *The site is not within the flight path and height restriction buffer zones of a public use airport.*

- *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 Table 2.1 and Sections 303 and 906 of the LDC.*

**Development Review Committee Recommendation:** Based on the Findings of Fact, 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-2025-38**.

*On April 1, 2026, the Planning Commission will vote on this application.*

### **CONDITIONS OF APPROVAL**

Based upon the findings of fact, DRC recommends APPROVAL of LDCU-2025-38 with the following conditions:

1. LDCU-2025-38 shall be approved for a 19-unit mobile home park, as demonstrated in the application and site. [PLG]
2. The site plan included herein together with the conditions of approval shall be considered the “Binding Site Plan.” Any modifications to LDCU-2025-38, except for those listed in Section 906.E of the LDC, shall constitute a Major Modification to this approval and require a Level 3 Review before the Planning Commission. [PLG]
3. Stormwater ponds shall be designed for a 100-year/24-hour storm event. An [Roads & Drainage]
4. During the Level 2 Review, the applicant/developer shall coordinate and provide for an easement or tract over an existing ditch for County access and use, as demonstrated on the site plan. [Roads & Drainage]
5. Prior to a Level 2 Review submittal, the applicant/developer shall submit for and be granted a waiver to public wastewater connection, in accordance with the standards in LDC Section 702.A.2, if a private septic system is to provide for wastewater treatment.

**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 4 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.

<b>Table 1</b>		
<b>Northwest: IND</b> West Highland Street Warehousing/Distribution	<b>North: IND &amp; RL-4</b> West Highland Street MHP & Vacant IND	<b>Northeast: RL-4</b> <b>West Highland Street</b> MHP & Site-Built Homes
<b>West: RL-4</b> Site-Built Home +/- 6.80 Acres	<b>Subject Property: RL-4</b> Site-Built Home +/- 4.93 Acres	<b>East: RL-4</b> Mobile Homes & Site-Built Home Multiple Properties
<b>Southwest: RL-2</b> Vacant Residential +/- 14.37	<b>South: RL-2</b> Mobile Home & Site-Built Homes Multiple Properties	<b>Southeast: RL-2</b> Site-Built Home +/- 4.98 Acres

The subject site is currently developed with a 1,356 sq. ft. site-built home constructed in 1950. It is described as ½ of Lot 9 within the West End Farm subdivision, recorded in 1914 (PB 3 PG 32). It is located approximately 0.15 miles from the city limits of Lakeland in an area that transitions between single-family development and subdivisions (containing both site-built and mobile home units) dating to the 1950s, and the warehousing and industrial growth that has since occurred along the I-4 and US 92 corridors.

**Compatibility with the Surrounding Land Uses and Infrastructure:**

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.”

Planning staff analyzes a site plan for compatibility by reviewing several factors: the type and intensity of adjacent uses versus the proposed use; how the proposed development interacts with the surrounding area in relation with existing uses; access to roads and where traffic generated from the site will travel; the proximity to retail, employment, emergency services, mass transit, parks, and other public services; and how the applicant addresses possible incompatibilities that might arise from the proposed use by utilizing mitigating strategies found in the Comprehensive Plan or through Conditions of Approval agreed upon by the applicant and staff.

A. Land Uses:

The applicant is requesting Conditional Use approval of a 19-unit Mobile Home Park (MHP) on +/- 4.93 acres within the Transit Supportive Development Area (TSDA) and Residential Low-4 (RL-4) future land use district near the city of Lakeland. Residential densities within these areas can reach 7 DU/AC. The proposed density is approximately 3.85 DU/AC. Though MHPs have multiple units under one ownership, the LDC requires a minimum space of 4,000 sq. ft. with two parking spaces for each unit. The mobile homes within the proposed park will be 2,160 sq. ft. on spaces of 5,900 sq. ft. All parking and setback requirements will be met, and a passive recreation area exceeding an acre is located on the southern end of the site.

As noted above, the property is primarily surrounded by residential uses, though with an Industrial land use district to the northwest. South of West Highland Street and abutting the property are parcels ranging from 0.45 acres to nearly 7 acres with single-family homes, as described in Table 1. The intensity of this development will exceed that found on these properties, but the site plan and standard LDC requirements offer strategies to mitigate these disparities.

For one, the proposed mobile homes will be setback 68-70 feet from the eastern and western property lines, more than the seven-foot side setbacks required in RL-4. For comparison, if a non-residential development was proposed here, like a church or school, the proposed setbacks for the MHP would exceed the 50-foot compatibility setback required between non-residential and residential development by LDC Section 220. To the rear of the property will be a stormwater pond that serves as a buffer and as recreation area. In addition to the setbacks, along the southern, eastern, and western property lines, a Type "B" landscaping buffer will be required in accordance with LDC Section 720. A Type "A" buffer will be planted along the frontage.

North of West Highland Street is a 30-unit MHP dating to the 1970s. Bordering this is the Edgewood Park subdivision (PB 13 PG 2) platted in 1925 with site-built homes dating to the 1940s on lots comparable to the space requirements proposed with this MHP (6,500 sq. ft. & 5,900 sq. ft., respectively). It is worth noting here that this property could be subdivided for site-built homes with a similar layout and density without a public hearing if setbacks and minimum lot sizes of 6,000 sq. ft. were maintained.

B. Infrastructure & Timing:

POLICY 2.102-A1 of the Comprehensive Plan states, "Polk County shall promote contiguous and compact growth patterns through the development process to minimize energy costs, conserve land, water, and natural resources, minimize the cost of services, and prevent development patterns where tracts of land are by-passed in favor of development more distant from services and existing communities."

The subject site is located amid employment centers and residential low densities with access to major transportation routes. Within the TSDA, public services, utilities, and mass transit are available with capacity in schools. Retail plazas, restaurants, and grocery stores are within two miles of the site within the city of Lakeland. This project represents a redevelopment opportunity in a location programmed for the proposed level of density.

**Nearest and Zoned Elementary, Middle, and High School**

As part of the application, the applicant submitted a non-binding school concurrency determination letter dated February 11, 2026, which states there is capacity at the zoned elementary, middle, and high schools.

Table 2, below, demonstrates the estimated demand for student seats for this 19-unit MHP.

**Table 2**

Name of School	Annual Estimated Demand	% Capacity School Year	Average driving distance from subject site
Jesse Keen Elementary	3 students	77%	±1.3 miles driving distance
Sleepy Hill Middle	1 student	78%	±7.2 miles driving distance
Kathleen Senior High School	2 students	70%	±2.6 miles driving distance

Source: Polk County School Board, Polk County Impact Fee Ordinance, GIS

The impact of 19 new mobile homes is not significant given the capacity available in surrounding schools. There are no new schools currently planned in this area of the County. For now, the existing schools have capacity to serve the population. A binding school concurrency letter will be issued through the Level 2 Review process.

**Nearest Sheriff, Fire, and EMS Station**

Polk County Fire Rescue provides Advanced Life Support transport to all residents and visitors of Polk County. It also provides fire suppression, rescue services, and fire prevention services to all of unincorporated Polk County and the municipalities of Eagle Lake, Polk City, Mulberry, Lake Hamilton, and Hillcrest Heights. Emergency response is considered effective if response times are within eight (8) minutes in rural and suburban areas and 13 minutes in urban areas.

Fire/EMS services are provided from PCFR Station 24, located within four miles of the site. Response times could average 9 - 11 minutes, depending on the type of call.

**Table 3**

	Name of Station	Distance	Response Time*
Sheriff	Northwest District Command 1045 Wedgewood Estates Blvd., Lakeland	±8.28 miles	P1 – 11:02 minutes P2 – 27:15 minutes
Fire/EMS	PCFR Station 24 – Winston Creek 1140 North Galloway Road, Lakeland	±3.4 miles	9-11 minutes

Source: Polk County Sheriff's Office and Public Safety

\*Response times are based from when the station receives the call, not from when the call is made to 911.

Sheriff response times are not as much a function of the distance to the nearest Sheriff's substation, but more a function of the overall number of patrol officers within the County. The PCSO is always trying to improve response times, especially for Priority 1 Calls, by employing new technologies such as Emergency 1 Dispatch (E1D) and Live911. E1D is a program designed to alert deputies at the earliest possible moment of a call for service that is being classified as a true emergency. E1D alert notifications are sent to deputies via their agency-issued smart phones as text messages, alerting deputies of the call type and address of the emergency. Similarly, Live911 technology allows deputies to hear emergency calls in real-time as the dispatcher is receiving the information. Both E1D and Live911 enable deputies to self-dispatch to these in-progress, high-risk incidents as dispatchers collect additional information about the call, thus reducing our response time to emergency situations.

Patrol staff in each district also monitors the response times for their areas and tries to manage their shifts according to manpower, hotspots, traffic obstructions/construction sites, etc. Areas that are more spread out tend to have slightly longer response times because of the vast land mass of their

district and time of travel. Since patrol deputies are not sitting in the office waiting on a call, it is easier for patrol staff to assign them to certain sectors or beats based on areas with higher call volume to reduce response time; however, this cannot be predicted precisely.

**Water and Wastewater Demand and Capacity:**

The subject site is located within the city of Lakeland’s utility service area.

**A. Estimated Demand:**

The proposed development is for 19 mobile home units. Mobile homes on lots of 6,000 square feet or less are estimated to generate 215 gallons per day (GPD) for water and 180 GPD for wastewater. Base density without Planning Commission approval in the RL-4 district is four (4) dwelling units per upland acre. Within the TSDA, this can be approved for up to seven (7) dwelling units per acre.

Table 4, to follow, provides generalized estimates of the anticipated water and wastewater demands under different development criteria. The first compares the maximum demand from site-built homes that could be built with the available acreage (360 GPD/270 GPD); the second contemplates multi-family up to 7 DU/AC (198 GPD/180 GPD); finally, this evaluates the proposed plan at the rates listed above.

**Table 4**

Subject Property	Estimated Impact Analysis		
	Demand as Currently Permitted RL-4 (4 DU/AC)	Maximum Permitted in the District RL-4 (7 DU/AC)	Proposed Plan (3.85 DU/AC)
±4.93 Uplands			
Permitted Intensity	19 SFR	34 MF	19 MH units
Potable Water Consumption (GPD)	6,840 GPD	6,732 GPD	4,085 GPD
Wastewater Generation (GPD)	5,130 GPD	6,120 GPD	3,420 GPD

*Source: Polk County Concurrency Manual & Polk County Utilities*

Though these are estimates, the mobile homes generally create less demand on utilities than the equivalent number of site-built homes. It is worth noting, however, that these usage rates are under evaluation to ensure their accuracy. Capacity information will become available during the Level 2 Review process.

**B. Available Capacity:**

The site is within the city of Lakeland’s utility service area. Potable water utilities will be provided by city of Lakeland. There is an existing water main running parallel to Old Tampa Highway, and connection will be required.

The applicant proposes connection to a private septic system. LDC Section 702.A.2 requires connection to available wastewater lines; however, a waiver per the requirements of Section 932, may be granted, if it can be shown that the parcel proposed for development cannot, or will not, be served by public wastewater within the County's 10-year Master Utility Plan, and the utility provider provides written verification that the extension of the centralized public wastewater is not economically feasible from the public perspective, the total developable parcel may develop with septic tanks and without the installation of dry lines.

The applicant for the waiver shall include an analysis of the following factors:

- (i) Status in the County's 10-year Master Utility Plan;
- (ii) Accessibility of the system;
- (iii) Infrastructure improvements needed for connection including ROW or easement acquisitions;
- (iv) Environmental sensitivity (soils, wetlands, floodplains, stressed basins);
- (v) Impact on public health based on input from the Health Department;
- (vi) Loss of potential future connections if waiver is granted.

C. Planned Improvements:

No County improvements are planned in this area.

**Roadways/ Transportation Network**

The Polk County Transportation Planning Organization (TPO) monitors traffic congestion on over 425 roadway segments (950 directional links). The Roadway Network Database contains current traffic data for all arterial and collector roads and includes information on the current traffic volume and level-of-service for these major roads. The report identifies both daily and peak hour traffic volumes. Daily traffic volumes are reported in Annual Average Daily Traffic (AADT) – the typical traffic volume on a weekday over a 24-hour period. Peak hour traffic represents the highest hourly traffic volume for period between 4 – 7 p.m. It is reported as both a two-way volume and as directional volumes (east and west or north and south).

The peak hour traffic volumes are used to estimate the level-of-service for each roadway, in each direction. Level-of-service refers to the quality of traffic flow. It is the primary measure of traffic congestion. Level-of-service (LOS) is measured on a scale of ‘A’ to ‘F’ with LOS ‘A’ being the best (free-flow traffic) and LOS ‘F’ being the worst (severe traffic congestion).

A. Estimated Demand:

The development of the proposed 19 mobile home units will not result in a significant loss of transportation capacity on the surrounding roadway network. It is estimated that there will be 7.87 vehicle trips per unit each day on average and approximately 0.48 vehicle trips per unit either coming or going during the peak hour.

Table 5, to follow, provides generalized estimated traffic demands under different development criteria. The first compares the maximum demand from site-built homes that could be built with the available acreage (7.81 AADT/1 Peak PM); the second contemplates multi-family up to 7 DU/AC (6.21 AADT/0.52 Peak PM); finally, this evaluates the proposed plan at the rates listed above.

**Table 5**

Subject Property	Estimated Impact Analysis		
	Demand as Currently Permitted RL-4 (4 DU/AC)	Maximum Permitted in the District RL-4 (7 DU/AC)	Proposed Plan (3.85 DU/AC)
Permitted Intensity	19 SFR	34 SFR	19 MH units
Average Annual Daily Trips (AADT)	148	211	150
PM Peak Hour Trips	19	18	9

Source: Polk County Concurrency Manual

No matter the level of review, a Major Traffic Study would not be required during the Level 2 Review process because the AADT is lower than 750. The Institute of Transportation Engineers (ITE) has conducted numerous studies on how much traffic that residential developments place on the roadway system at all times of the day. They also have identified how much of that traffic is going onto the system and how much is coming off the system. The biggest threat to roadway capacity is traffic leaving the development and entering the system. ITE estimates that approximately 38% of the average PM peak hour (peak day) traffic will be leaving the development, which is approximately three (3) vehicles.

**B. Available Capacity:**

From Table 5, the proposed development will not consume a significant amount of available capacity if it is approved. It will likely generate less traffic than is allowed onsite by-right because of the type of units within it.

There is capacity on the nearest affected traffic segment. Table 6, to follow, displays the generalized capacity on the most affected transportation links.

**Table 6**

Link #	Road Name	Current Level of Service (LOS)	Available PM Peak Hour Capacity	Minimum LOS Standard
4096E	West Highland Street From: Old Tampa Highway to Sikes Boulevard	C	658	D
4096W	West Highland Street From: Sikes Boulevard to Old Tampa Highway	C	652	D

*Source: Polk County Transportation Planning Organization, Concurrency Roadway Network Database January 17, 2025*

**C. Roadway Conditions:**

West Highland Street is an Urban Collector roadway with a paved surface width of 20 feet and a right of way of 70 feet at the entrance to the site. Both are below the LDC standards in LDC Table 8.2 ( 24’ pavement/80’ RW) for an Urban Collector.

Per LDC criteria, land to be developed for residential purposes adjacent to an existing County road where right-of-way is deficient shall dedicate or deed additional right-of way from the centerline of the existing County road along the entire frontage of the development site at a width of 40 feet from the centerline of two (2) lane collector roads constructed with a Rural Section (no curb).

Development sites accessing a collector roadway that is substandard due to pavement width shall increase the pavement width to 24 feet in both directions and equally on both sides of the road along the existing roadway right-of-way.

**D. Sidewalks**

No sidewalks are presently located along the frontage of the site. Sidewalks will be required in accordance with LDC Section 707. The nearest sidewalk connection is approximately 0.33 miles to the southeast.

**E. Mass Transit**

Citrus Connection’s Circulator-Westside Route passes the subject site. A bus stop is located at Old West Highland Street & Lebanon Road, approximately 330 feet from the property line. According

to the city of Lakeland, the stop spacing for this location would not be suitable for a transit shelter, however a sidewalk would facilitate a walking path to the current stop.

**Park Facilities and Environmental Lands:**

A. Location:

Lakeland Parks & Recreation’s Southwest Softball Complex is located at 1444 West Highland Street, Lakeland, FL 33815, approximately 1.5 miles to the east. Westside Park is located at 1800 Oakhill Street, Lakeland, FL 33815. It is approximately 1.6 miles to the east.

B. Services:

The Southwest Softball Complex site provides four diamonds; two soccer fields; and a tot lot. Westside Park is a community-focused recreational facility in Lakeland offering a softball diamond, children's playground, and picnic pavilion.

A public boat ramp is located at Lake Hunter to the east.

C. Environmental Lands:

No environmental lands are located within the vicinity.

D. Planned Improvements:

There are no further recreational improvements scheduled for this quadrant of the County at this time.

**Environmental Conditions**

The Polk County Comprehensive Plan has a Conservation Element. Division 2.300 of the Comprehensive Plan mentions, “The goal, objectives, and policies of the Conservation Element are designed to protect the natural resources which make Polk County a special place while preventing degradation of the environment and allowing development and economic expansion to occur.” There should be no serious environmental conditions that need to be addressed with this subject site.

A. Surface Water:

There is no surface water onsite. The nearest natural body of water is Lake Hunter, approximately two miles to the east. This lake is approximately 91 acres and is impaired, according to FDEP’s implementation of the Impaired Waters Rule (IWR). The FDEP evaluates whether waters meet their designated uses, which include aquatic life use support, primary contact and recreation use support, fish and shellfish consumption use support, and drinking water use support. This project is not anticipated to have direct impact on Lake Hunter.

This site has been identified as being within the Trailer Park Drain within an area known as the Itchepackesassa stressed basin. Treatment of stormwater from new impervious areas shall be properly permitted through the County and SWFWMD. A 100-year/24-Hour stormwater design will be required.

B. Wetlands/Floodplains:

No wetlands or flood zones are identified onsite.

C. Soils:

The developable area of the site is comprised of all sandy soils: Pomona, and Smyrna & Myakka Sands, according to the U.S. Department of Agriculture, Soil Conservation Service, Polk County Survey.

**Table 7**

<b>Soil Name</b>	<b>Septic Tank Absorption Field Limitations</b>	<b>Limitations to Dwellings w/o Basements</b>	<b>% of Site (approximate)</b>
Pomona Fine Sand	Severe: wetness, percs slowly	Severe: wetness	86%
Smyrna & Myakka Fine Sands	Severe: wetness	Severe: wetness	14%

*Source: Soil Survey of Polk County, Florida, USDA, Soil Conservation Service*

The Pomona series consists of very deep, poorly and very poorly drained soils that formed in sandy and loamy marine sediments. This allows poor percolation for septic systems and can lead to standing water when the ground has become saturated when there is a constrained outfall for stormwater.

D. Protected Species

According to Polk County Endangered Habitat Maps, the proposed development is not located within a one-mile radius of an endangered species sighting. (Source: Florida Natural Areas Inventory, 2002, 2006 & 2011).

This site is not located within the Florida Wildlife Corridor or listed as an existing natural area within the Polk Green District Map. No conservation easements are located adjacent to the subject site, according to the Polk County Property Appraiser.

The Polk Green District overlay was established to guide planning for, and the acquisition or conservation of, an interconnected network of open spaces, natural areas and agricultural lands.

The overlay provides a framework for land use policies and community investments that provide:

- a. protection of natural resources and wildlife habitat;
- b. habitat corridors through linked open spaces;
- c. protection of historic and cultural resources;
- d. recreational opportunities;
- e. community health benefits;
- f. economic development opportunities; and
- g. multi-use trails connecting population centers to natural areas.

The Florida Wildlife Corridor is statewide network of nearly 18 million acres of connected lands and waters supporting wildlife and people. It is not incorporated in the Comprehensive Plan or LDC at this time.

E. Archeological Resources:

There are no protected archeological resources onsite, according to the Florida Department of State, Division of Historical Resources.

F. Wells (Public/Private)

The site is not within a Wellfield Protection district. The nearest one is approximately 0.50 miles to the northwest. According to the applicant, no wells are located onsite.

G. Airports:

The site is not within the flight path or height restriction buffer zones of a public use airport.

**Economic Factors:**

MHPs provide an affordable leased housing opportunity. This project is well-situated near employment centers, urban services, and retail and commerce within the city of Lakeland. Shorter commutes to work and recreation save money for those living in the park and reduces the traffic impacts. This is a redevelopment project in an area primed for higher-density development. An argument can be made, though, that the density proposed with this project is not enough, given the underlying development area, future land use district, and provision of daily needs in the area. The connection to wastewater, if the city accommodates the capacity, could potentially add 15 more units.

**Consistency with the Comprehensive Plan and Land Development Code:**

Table 8, to follow, provides an analysis of the proposed request when compared to typical policies of the Comprehensive Plan selected by staff for evaluation of development proposals. Based upon this analysis, the proposed request is consistent with relevant policies of the Polk County Comprehensive Plan.

**Table 8**

<b>Comprehensive Plan Policy</b>	<b>Consistency Analysis</b>
POLICY 2.102-A2: COMPATIBILITY - Land shall be developed so that adjacent uses are compatible with each other, pursuant to the requirements of other Policies in this Future Land Use Element, so that one or more of the following provisions are accomplished: a. there have been provisions made which buffer incompatible uses from dissimilar uses; b. incompatible uses are made to be more compatible to each other through limiting the intensity and scale of the more intense use; c. uses are transitioned through a gradual scaling of different land use activities through the use of innovative development techniques such as a Planned Unit Development.	The proposed mobile home park development is made compatible with neighboring properties by some screening where there is a significant disparity in development density. Otherwise, the surrounding area has similar developments and is comprised of single-family uses.

Comprehensive Plan Policy	Consistency Analysis
POLICY 2.102-A1: DEVELOPMENT LOCATION – Polk County shall promote contiguous and compact growth patterns through the development process to minimize energy costs, conserve land, water, and natural resources, minimize the cost of services, and prevent development patterns where tracts of land are by-passed in favor of development more distant from services and existing communities.	The site is located in an area planned for more intense urban development. The close proximity to commercial is also a plus for higher density housing. Multiple retail goods and services are within two miles of the site.
POLICY 2.102-A3: DISTRIBUTION - Development shall be distributed throughout the County consistently with this Future Land Use Element so that the public utility, other community services, and public transit and transportation systems can be efficiently utilized; and compact, high-density and intensity development is located where urban services can be made available.	The proposed development is consistent with services available in the TSDA.
POLICY 2.102-A4: TIMING - The development of land shall be timed and staged in conjunction with the cost-effective and efficient provision of supporting community services which, at a minimum, shall require compliance with the Plan's Level of Service requirements and the County's concurrency management system.	The site is located within an area that has a significant amount of urban infrastructure and services with ample capacity to serve it. The only service weakness is sidewalks which the development will add to the network.
POLICY 2.102-A15: ADEQUATE PUBLIC FACILITIES - The County will direct new growth to areas where adequate public facilities exist or are planned; and ensure that essential services are in place to provide for efficient, cost effective response times from the Fire Department, Sheriff's Department, and Emergency Management Service (EMS).	The subject property is located within an area of the County that has adequate public safety services as identified in the staff report.

The Planning Commission, in the review of development plans, shall consider the following factors listed in Table 9 in accordance with Section 906.D.12 of the Land Development Code.

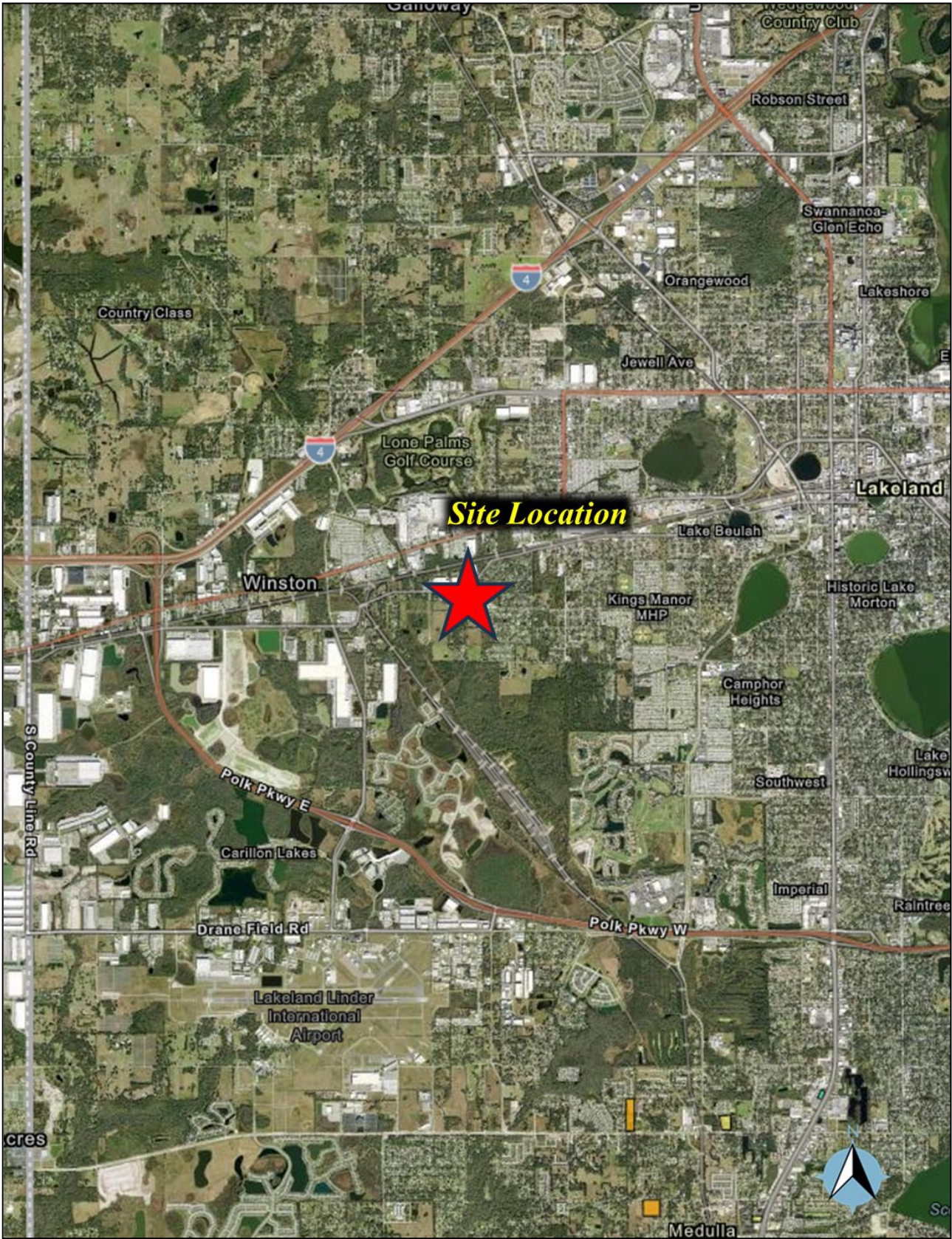
**Table 9**

<b>The Planning Commission, in the review of development plans, shall consider the following factors in accordance with Section 906.D.12 of the LDC:</b>	
<b>Whether the proposed development is consistent with all relevant requirements of this Code;</b>	<i>Yes, this request is consistent with The LDC, specifically Sections 906.D and 303</i>
<b>Whether the proposed development is consistent with all applicable policies of the Comprehensive Plan;</b>	<i>Yes, this development is consistent with the Comprehensive Plan because it meets the density requirements.</i>
<b>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</b>	<i>Yes, the request is compatible with surrounding uses and the general character of the area, as demonstrated within the staff report.</i>
<b>How the concurrency requirements will be met, if the development were built.</b>	<i>The request is capable of meeting concurrency requirements in the timeframe in which it will be constructed.</i>

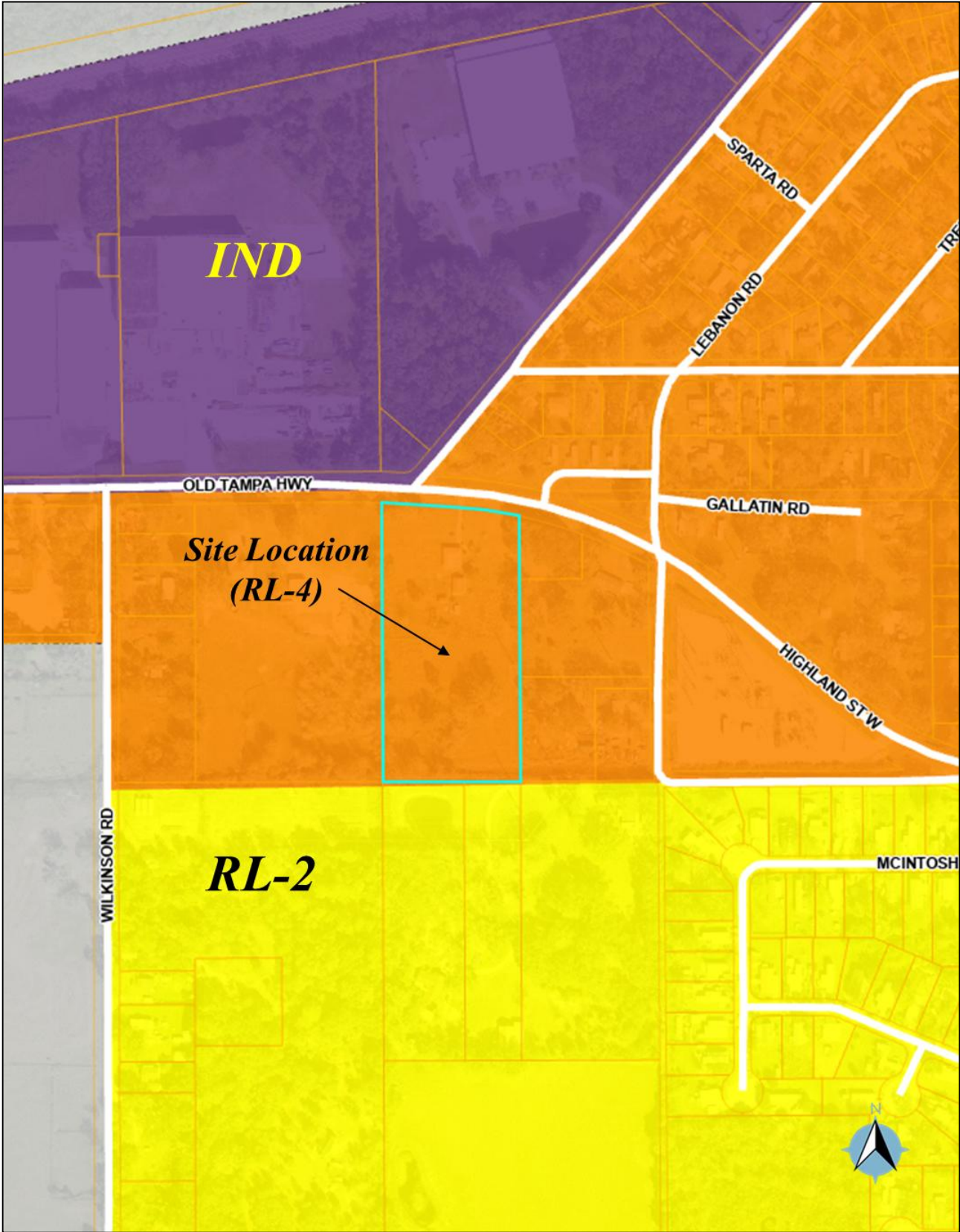
**Comments from other Agencies:** Land Development Engineering, the County Surveyor, Polk County School Board, Roads & Drainage, and the city of Lakeland contributed to the drafting of this report.

## **Exhibits**

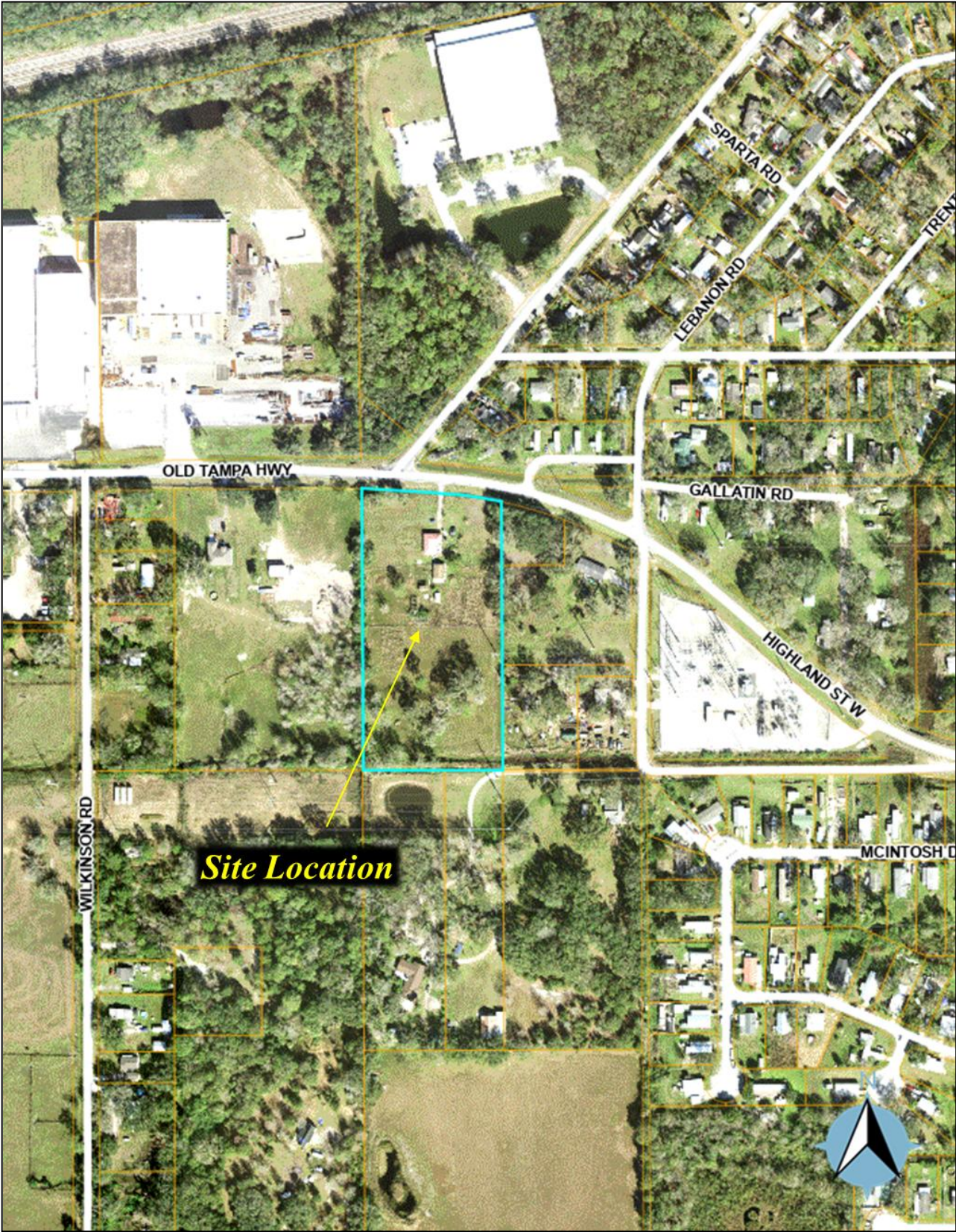
Exhibit 1	Location Map
Exhibit 2	Future Land Uses
Exhibit 3	Aerial Image (Context)
Exhibit 4	Aerial Image (Close)
Exhibit 5	Site Plan



Location Map



Future Land Use Map



Aerial Image - Context



Aerial Image – Close

