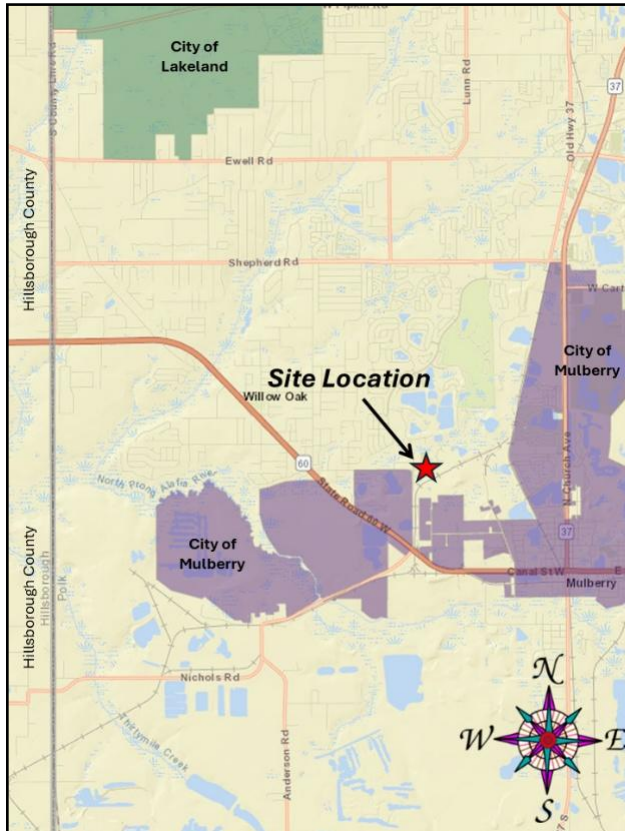


**POLK COUNTY  
DEVELOPMENT REVIEW COMMITTEE  
STAFF REPORT**

<b>DRC Date:</b>	November 20, 2025	<b>Level of Review:</b>	Level 3 Review
<b>PC Date:</b>	January 7, 2026	<b>Type:</b>	Conditional Use
<b>BoCC Date:</b>	N/A	<b>Case Numbers:</b>	LDCU-2025-25
<b>Applicant:</b>	Bert Deshon Hudson Jr.	<b>Case Name:</b>	Hudson MH
		<b>Case Planner:</b>	Andrew Grohowski, Planner II

<b>Request:</b>	The applicant is requesting Conditional Use approval for a Mobile Home to be permitted on ±0.50 acres within a Residential Suburban Future Land Use District.
<b>Location:</b>	The subject site is located at 2175 Third Street, north and east of Old Highway 60, west of State Road 37 and Arnaz Drive, south of Blackwater Oaks Drive, northwest of the City of Mulberry in Section 34, Township 29, Range 23.
<b>Property Owners:</b>	Bert Deshon Hudson Jr., Mynita C. Hudson, & Estate of Ethel M. Smith
<b>Parcel Number (Size):</b>	232934-000000-024160 (±0.50 acres)
<b>Future Land Use:</b>	Residential Suburban (RS)
<b>Development Area:</b>	Urban Growth Area (SDA)
<b>Nearest Municipality:</b>	City of Mulberry
<b>DRC Recommendation:</b>	Conditional Approval
<b>Planning Commission Vote:</b>	Pending Public Hearing

**Location Map**



**2023 Aerial Photo (Close-up)**



## 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 a  $\pm 0.50$  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. 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 uses.

The property is not located within a platted subdivision. The Fuller Heights area is characterized by residential properties that have been in existence since the 1950s. There are eighty-seven (87) lots in the general vicinity, seven (7) of which are mobile homes, fifty-two (52) single-family homes, and one church. The remaining lots are vacant. The nearest mobile home is approximately 520 feet away to the west (Parcel No. 232934-000000-042390) which has had a mobile home on the property since the 1990s.

Staff recommends approval. This mobile home request is compatible with the surrounding area. The subject property is zoned for residential use as part of the larger RS land use district. The RS permits single-family dwelling units. The proposed mobile home will meet the required setbacks for the Land Use District and all other applicable setbacks in the LDC. The proposed request is consistent with the LDC and Comprehensive Plan.

## Findings of Fact

- *LDCU-2025-25 is a Conditional Use request to allow a mobile home on Parcel No. 232934-000000-024160 ( $\pm 0.50$  acres) within a Residential Suburban (RS) land use district in the Suburban Development Area (SDA).*
- *The subject property is currently vacant and has an unassigned address at 4<sup>th</sup> Street, Mulberry, FL 33860.*
- *The surrounding properties are within a RS Land Use District, with Imperial Lakes DRI to the north (PUD 73-5), and consist of single-family detached residences, mobile homes, and vacant land. A Polk County Utilities Facility is to the east.*
- *The subject property has approximately 145 feet of frontage along 4<sup>th</sup> Street (Road No. 933402) a County-maintained Local Roadway with a paved surface width of 20 feet, according to the Polk County Roadway Inventory.*
- *Per Table 2.2 of the LDC, RS land use mandates right-of-way setbacks for the primary structure of 35 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*
- *Chapter 2, Table 2.1 of the LDC, indicates Individual Mobile Homes within the RS district are conditionally permitted following a Level 1 Review.*
- *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 recorded prior to May 20, 1971;*
  - 4. Within any platted residential subdivision, or single platted phase within a multiple phased development recorded after May 20, 1971, in which 50 percent or more of the developed lots contain mobile homes;*
  - 5. On any un-platted parcel in the A/RR district;*
  - 6. On any un-platted parcel that is five acres or larger in the RS district;*
  - 7. On any un-platted legal residential lot or parcel that is abutting vacant properties to all side and rear property lines;*
  - 8. On any un-platted parcel where at least one property abutting the subject property's side lot line has a mobile home;*
  - 9. 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,*
  - 10. 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.***
- *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.”*
- *Fire and EMS Response is from Polk County Fire Rescue Station 15 located at 300 Kid Ellis Road, Mulberry. This is located approximately 4.1 miles from the subject site with a response time between 8:20 to 11:40 minutes.*
- *Sheriff’s response to the site is served by the Southwest District (SW) located at 4120 US Highway 98 South, Lakeland. The response times for SW December 2025 were: Priority 1 Calls – 8:34 and Priority 2 Calls – 33:01.*

- *The subject property is located within the Polk County Utilities Southwest Regional Utility Service Area (SWRUSA) for potable water service. Subject site will connect to the County for water and provide a private septic system in compliance with Polk County Standards for wastewater.*
- *The development is zoned for Purcell Elementary, Mulberry Middle, and Mulberry Senior High. The site is 2.7 miles from Purcell Elementary; 3.3 miles from Mulberry Middle; and 3.7 miles from Mulberry Senior High.*
- *The subject parcel is not within one of the Wellhead-Protection Areas.*
- *The property is composed entirely of Sparr Sand.*
- *There are no wetlands or flood zones on the subject parcel.*
- *According to the Florida Natural Areas Inventory Biodiversity Matrix, the site is not located within a one-mile radius of an 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.*
- *The subject site will have ingress and egress access through 4<sup>th</sup> Street. 4<sup>th</sup> Street is a paved, Local Residential, County-maintained roadway. According to the 2025 Roadway Network Database, the nearest monitored roadway SR 60 (5901E) has approximately 950 available PM Peak Hour trips; SR 60 (5901W) has approximately 908 available PM Peak Hour trips. SR 60 current Level-of-Service (LOS) is "C" with an adopted LOS standard of "D".*
- *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 2.106 SUBURBAN DEVELOPMENT AREA (SDA) 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-2025-25.**

## **CONDITIONS OF APPROVAL**

Based upon the findings of fact the Development Review Committee recommends APPROVAL of LDCU-2025-25 with the following Conditions:

1. LDCU-2025-25 is approved for no more than one (1) mobile home on Parcel No. 232934-000000-024160 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**

<b>Northwest:</b> Imperial Lakes DRI, PUD 73-5 Fuller Heights County Park ±4.71 acres	<b>North:</b> Imperial Lakes DRI, PUD 73-5 Fuller Heights County Park ±4.71 acres	<b>Northeast:</b> Imperial Lakes DRI, PUD 73-5 Fuller Heights County Park ±4.71 acres
<b>West:</b> RS Single-family residence ±0.41 acres	<b>Subject Property:</b> RS Vacant ±0.50 acres	<b>East:</b> RS Single-family residence ±0.50 acres
<b>Southwest:</b> RS Single-family residence ±0.41 acres	<b>South:</b> RS Single-family residence ±0.41 acres	<b>Southeast:</b> RS Single-family residence ±0.48 acres

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

The property is located in the Residential Suburban (RS) land use district, with Fuller Heights County Park directly to the north. This park was constructed sometime prior to 2005 within the Imperial Lakes DRI. Imperial Lakes was initially approved as a Planned Unit Development (PUD 73-5) in 1973, and subsequently as a Development of Regional Impact in 1977 (DRI #4). The immediate surrounding area has been established as a residential neighborhood since the 1950s. To the east just 450 feet along Fourth Street is the Southwest Regional Wastewater and Water Treatment Facility operated by Polk County Utilities (PCU). The subject site has remained vacant since it was created in 1991, according to historical aerials.

## Compatibility with the Surrounding Land Uses and Infrastructure:

This request is compatible with the Comprehensive Plan and Land Development Code. The impact from a single mobile home is minimal. The immediate surrounding land uses have historically been residential uses and is adjacent to the historic Fuller Heights

*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.”*

neighborhood that was established as an unrecorded platted subdivision in the 1950s. As of today, the Fuller Heights area has a total of eighty seven (87) lots – seven (7) of which are mobile homes, fifty-two (52) single-family homes, and one church. Meanwhile the remaining lots are vacant land, including the subject site. Many of the homes within the neighborhood were built before 1970. The proposed mobile home is about 2,432 square feet (32’ x76’), which is similar in size to the surrounding dwelling units. The existing single-family homes range greatly in size from 672 square feet to 4,025 square feet. The nearest mobile home is approximately 520 feet away to the west (Parcel No. 232934-000000-042390) which has a 1,134 square foot mobile home on the property since 1994. Please refer to Table 1 and Exhibit 6 for the layout of the mobile homes in relation to the site-built homes.

## 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 Purcell Elementary, Mulberry Middle, or Mulberry Senior High; however, Purcell Elementary is at 70% capacity, Mulberry Middle is currently operating at 86% capacity, and Mulberry Senior High is currently operating at 96% capacity. The subject property is located within the SWRUSA and will connect to Polk County Utilities for potable water. The subject site will provide a private septic system in compliance with Polk County standards for wastewater.

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	
<b>Schools (Zoned)</b>	Purcell Elementary, Mulberry Middle, and Mulberry Senior High.
<b>Sheriff</b>	Sheriff’s response to the site is served by the Southwest District (SW) located at 4120 US Highway 98 South, Lakeland. The response times for SW December 2025 were: Priority 1 Calls – 8:34 and Priority 2 Calls – 33:01.
<b>Fire/EMS</b>	Fire and EMS Response is from Polk County Fire Rescue Station 15 located at 300 Kid Ellis Road, Mulberry. This is located approximately 4.1 miles from the subject site with a response time between 8:20 to 11:40 minutes.
<b>Water</b>	Polk County Utilities
<b>Sewer</b>	Private septic system in compliance with Polk County Standards.
<b>Transportation</b>	The subject site will have ingress and egress access through 4 <sup>th</sup> Street. 4 <sup>th</sup> Street is a paved, Local, County-maintained roadway. According to the 2025 Roadway Network Database, the nearest monitored roadway SR 60 (5901E) has approximately 950 available PM Peak Hour



Urban Services and Infrastructure Summary	
	trips; SR 60 (5901W) has approximately 908 available PM Peak Hour trips. SR 60 current Level-of-Service (LOS) is “C” with an adopted LOS standard of “D”.
<b>Urban Sprawl</b>	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 145 feet of frontage on 4th Street, using a private septic system in compliance with Polk County Standards and the water supply will be provided by Polk County Utilities. 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	250 GPD	7.81 AADT	1.00 PHT
<i>Source: Polk County Concurrency Manual. The proposed development assumes that the potable water rate for a mobile home will consume 360 GPD and generate 250 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 further known conditions that should pose a threat to the existing environmental resources based upon the proposed request (See Table 4, below). The parcel is not located within any Flood Hazard Zones or wetlands. 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 property is composed entirely of Sparr 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 at 114’ in elevation with gradual slopes offsite toward the northeast. The subject property is not located within a historical preservation area. The subject site is located in South Lakeland Airpark’s Airport Height Notification and In-Flight Visual Interference Zones.

**Table 4**

Environmental Conditions Summary	
<b>Surface Water</b>	None
<b>Wetlands/Floodplains</b>	The parcel is not within any Flood Zones and does not contain any wetlands.
<b>Soils</b>	The property is composed of Sparr Sand which provides poor drainage, but the soil is not of such that would limit compliance with applicable LDC regulations for the proposed use.
<b>Protected Species</b>	The subject site is not located within one mile of any identified endangered species. (Sources: Florida Natural Areas Inventory Biodiversity Matrix)
<b>Wellfield Protection</b>	The property is not located within any County Wellhead-Protection Areas.
<b>Historical Preservation</b>	The subject property contains no historical resources as monitored by the State of Florida’s Division of Historical Resources.

<b>Airports</b>	The subject property is located within the South Lakeland Airpark Height Notification and In-Flight Visual Interference Zones.
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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 LDC.

**Table 5**

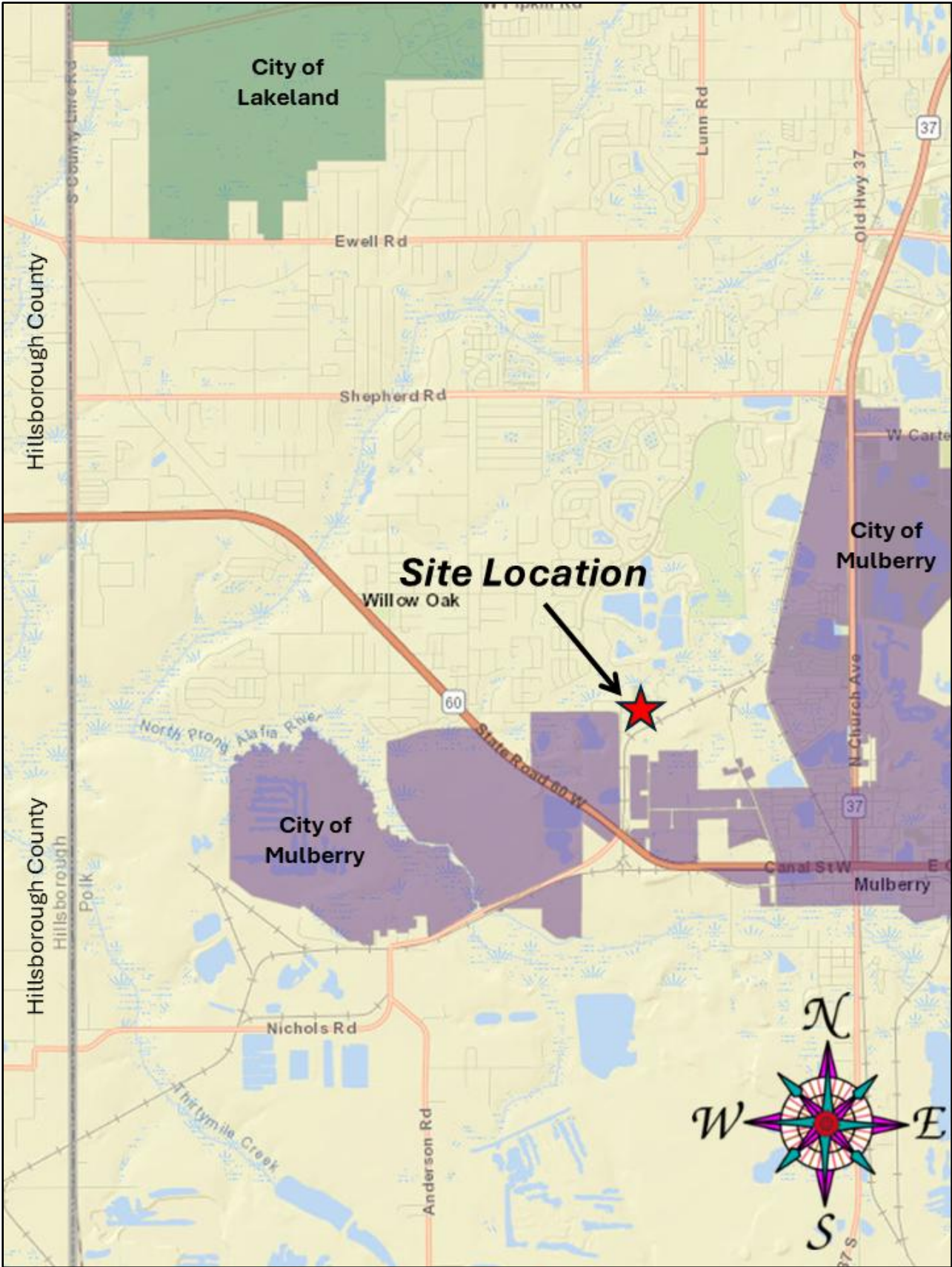
<b>The Planning Commission, in the review of development plans, shall consider the following factors in accordance with Section 906.D.7 of the LDC:</b>	
<b>Whether the proposed development is consistent with all relevant requirements of this Code;</b>	<i>Yes, this request is consistent with the LDC, specifically 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>
<b>Whether the proposed development is consistent with all applicable policies of the Comprehensive Plan;</b>	<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>
<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. See Pages 5 &amp; 6 of this staff report for data and analysis on surrounding uses and compatibility.</i>
<b>How the concurrency requirements will be met if the development were built.</b>	<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 6-7 of the Staff Report.</i>

**Comments from other Agencies:** None

**Exhibits:**

Exhibit 1	Location Map
Exhibit 2	Future Land Use Map
Exhibit 3	2025 Satellite Image (Context)
Exhibit 4	2023 Aerial Photo (Close-up)
Exhibit 5	Site Plan
Exhibit 6	Surrounding Neighborhood





Location Map





Future Land Use Map



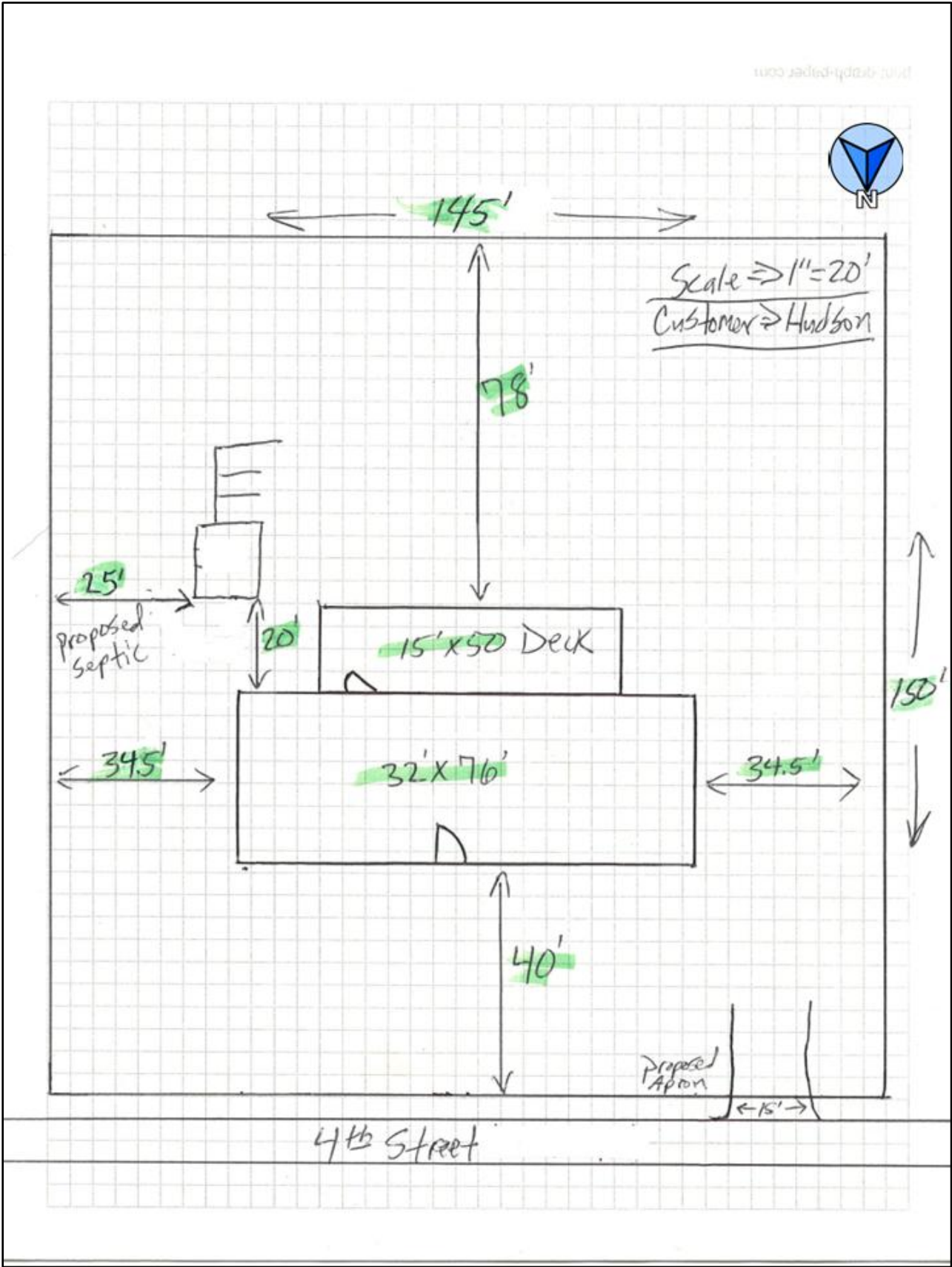


2025 Satellite Image (Context)



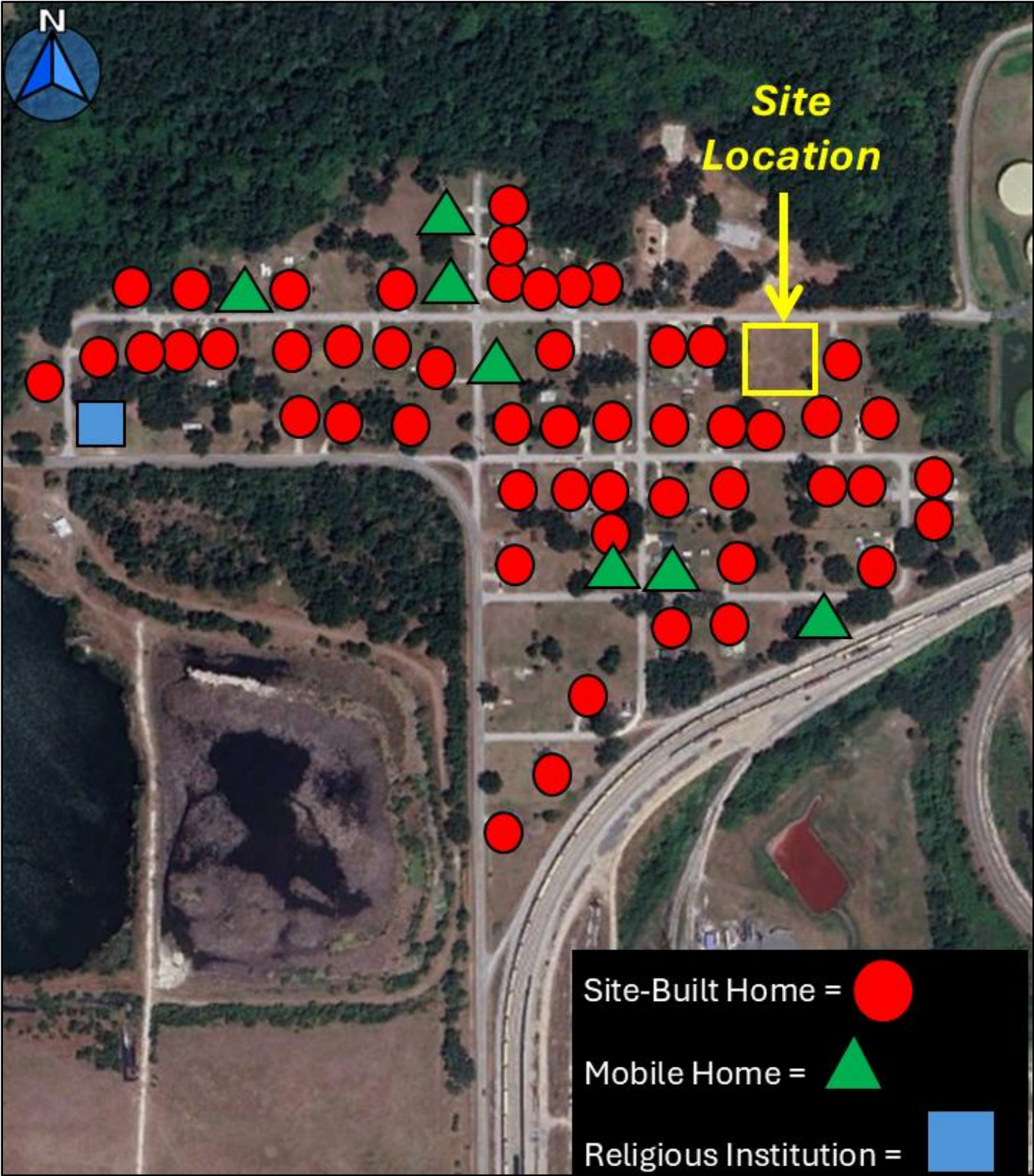


2023 Aerial Photo (Close-up)



Site Plan





Surrounding Neighborhood