



## Loudoun County, Virginia

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Planning Commission

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March 13, 2019

Loudoun County Board of Supervisors

1 Harrison Street, SE

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Subject: Transmittal of the Loudoun 2040 Comprehensive Plan

Board Members:

Loudoun is a County with wide diversity across policy areas, in its built environment, among its residents and their life styles and in the visual landscape of distinct localities. Achieving balance across these elements is necessary to create a viable and sustainable comprehensive plan that can guide the County in land use decisions over the next 20 years. The Commission, starting in July 2018 and beginning with the Envision Loudoun stakeholder plan has crafted a planning vision, the Loudoun 2040 Comprehensive Plan that is economically, socially and environmentally balanced. No plan can be perfect, but Loudoun 2040 is grounded in economic reality, realistically achievable, and it is fair - it meets the needs of the entire county without bias toward any small group of people who live in one area.

The Commission is proud of the resulting document which maximizes planning opportunities, maintains flexibility to respond to inevitable market shifts, preserves Loudoun's quality of life, and situates our County in the best possible competitive position for long-term success.

The Commission received advice from myriad parties to the comprehensive planning process, but none as compelling as the need to address future housing demands facing the county. The void in the housing supply has elevated housing cost far beyond the metrics of affordability, impacting the attraction of a diverse populace and the ability to support a vibrant workforce for the County and the region. It works against the county's outstanding economic development efforts which are necessary for long-term economic vitality. Economic growth requires housing, and in turn, the County needs sustained economic vitality to enact policies that address unmet housing needs. Finding the right balance will be vital for the County's future over the next decades.

The Commission debated the housing issue vigorously. While no one supports unchecked growth, the majority view is that the Plan must work to meet the housing demand forecast. Failing to meet the demand exacerbates the current problems of availability and affordability and

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undermines efforts to expand opportunities to attract first time homebuyers, county workforce employees, empty-nesters, and employers considering relocation and seeking adequate housing for their employees. Equally important, most of the unbuilt housing stock comes from either multi-family units near the Metro or from the 12,000 by-right lots in the RPA, based on the RGP and the pipeline of unbuilt homes. But the demand is for fee simple, single-family housing, whether attached or detached, and that housing stock is quickly depleting. Without an alternative, development pressure will move to large portions of the Rural Policy Area where demand will elevate prices, landowners will be motivated to liquidate to developers and strategies to preserve Western Loudoun will fail.

The Plan presents an approach that meets the future housing needs as set forth in the Housing Needs Assessment. It maximizes urban style multi-family development in the Urban Policy Area, and in the Suburban Policy Area it builds out the remaining available land while supporting mixed-use residential development and encouraging creative redevelopment. The plan also allows development in the Transition Policy Area with appropriately styled housing units. The TPA should be used as it was intended, as a buffer to absorb growth pressure, and it is the best means by which to preserve the RPA.

Housing units often get reduced to one number which camouflages the central challenge. Not everyone wants to live in multi-family structures, or in large-lot mansions or in rentals. And housing solutions are not addressable by simply adding more subsidized dwelling units. The demand for homes going forward must be met with a supply of owned and rental units that reflects a much wider range of housing products in a variety of styles, sizes and widely-disparate price points. This is the “continuum of housing” - it is central to this Plan and it addresses affordability by offering much greater housing diversity, particularly for small and compact units, at commensurately lower prices.

In short, the Plan, accomplishes its goals for economic development, residential housing choice and growth management by meeting 95 % of the housing shortage by 2040 and making homes more financially approachable to a wider spectrum of the population. It does so while maintaining the visual distinctness of the TPA and without any residential density changes in the RPA and it requires no major improvements in transportation. The SPA will reflect new development options and provide needed efforts to redevelop and revitalize aging and underperforming areas. Requirements for community facilities are called out in all appropriate place types and quality development guideline are prominent in the Plan. Important to any plan, this can be accomplished while showing a net positive fiscal impact to the County.

Additional highlights of the Plan are noted by policy area below.

### **Urban Policy Area**

- The Urban Policy Area (UPA) is a new concept to the County. To be successful, the County’s consultants reiterated viewing “urban” in a wholly new context apart from traditional suburban planning. The Plan maintains that focus with appropriate place types, design guidelines, school layout and streetscapes. The Plan avoids against “suburbanizing” the UPA

in ways that detract from the urban focus and erode the financial capacity to support Metro debt and operating costs.

- It is unlikely the UPA will blossom overnight into the Rosslyn-Ballston Corridor or Reston Town Center, both of which have evolved over decades. The UPA may progress in phases too. The Plan anticipates this and incorporates flexibility for developers to remain agile in responding to the market.
- Abstract suggestions have proposed “pushing more into the UPA because it is appropriate there.” Such abstractions miss the reality that marketability dictates success. The Commission would welcome taller structures with greater yields, but it is infeasible at this time against the market direction. The Plan reflects a view of what can be built and absorbed.

### **Suburban Policy Area**

- The Suburban Policy Area (SPA) has been the focus of Loudoun County development since the last comprehensive plan in 2001. Much has occurred since then and only about 1200 acres remain. As a result, smaller development and infill applications will become more prevalent. Plan strategies and actions are fully supportive.
- Many parcels are designated “Suburban Mixed Use” a place type that covers many areas and possible developments. The Plan incorporates flexibility in this place type, with ranges for density, FAR, and uses. The Plan expects that as applications approach the upper limits, they reflect final buildout and include more robust features, but developments at the lower end of the ranges may indicate a phased approach.
- The Plan accommodates and supports redevelopment, rehabilitation, reuse and revitalization. This will become increasingly relevant for some areas in the County that were first to develop. The Plan urges creative and innovative solutions that will require commensurate flexibility in the review process. Many small redevelopment projects are built on fragile economic business cases and will need to be evaluated carefully and individually.

### **Transition Policy Area**

The history and intent of the Transition Policy Area (TPA) is a topic of much debate. Some have assumed the intent by the Board of Supervisors’ actions in 2001. Several commissioners invested substantial time to peruse historic files but uncovered no clear directives. What is clear, however, is that in April 2004, CPAM 2004-0001 amended the TPA policies in the 2001 Revised General Plan, directing the extension of central water and sewer service into all six subareas of the TPA, amending the General Plan and defining the western edge of the TPA as the “Urban Growth Boundary” beyond which central water and sewer is not allowed.

The TPA was made a permanent policy area along with the SPA and RPA, to support its own land use policies and zoning regulations. But nothing bars future changes in density in the TPA or the supporting land uses. It appears the intent of the TPA was to serve as a placeholder to absorb development pressure from the SPA as would certainly occur in the future. That is what has occurred since 2001 and the county now needs to take advantage of the TPA as was initially

envisioned to manage growth, help close the unmet housing need and buffer rural Loudoun from development pressure.

The Plan addresses the overarching need for more available and affordable housing by maximizing high urban density in the UPA; utilizing the remaining available land in the SPA and encouraging redevelopment, infill and revitalization. But those efforts combined fall short by 50 percent of meeting the County's housing demands by 2040. By allowing development in the TPA the Plan protects the Rural Policy Area by reducing the need to build 12,000 houses that can be built by-right in the RPA today. The development pressure will continue and left unplanned it will occur in the least desirable area of the County, negatively impacting the rural characteristic and economy in the RPA and taxing resources that are not sustainable. The TPA is designed to handle that growth, with central water and sewer provisioned in most areas and a road network nearby or added to the Plan.

To protect the RPA and address housing needs the Plan recommends changes to the TPA:

- The Plan allows development in the TPA and the place types call for small, compact dwelling units in selected areas, in a style that reflects village green environments and maintains visual distinctness.
- Any development requires 50 percent open space.
- The number of place types are limited with quality design requirements to maintain the envisioned TPA character and avoid visually blending the SPA with the TPA.
- The Commission does not support residential development in all areas at this time instead recommending three large land bays (M1, M2 and M3, representing 8800 residential units) only be considered at such time as water, sewer, transportation and public facility infrastructure becomes available.
- The Plan allows some commercial development limited in size and scale to support essential needs for residents without adding unwanted traffic to the area. Commercial development also requires 50 percent open space.
- The Plan recommends adding proffers to the TPA to provide fair and balanced residential contributions to capital needs and to address the imbalance from by-right residential development.
- Most parcels on the western-most TPA boundary, adjacent to the RPA, remain unchanged from the current planned density.
- The Plan adds light industrial (LI) to the Sycolin Road corridor to help preserve existing flex industrial areas from being overtaken by data centers which are squeezing out small businesses necessary for a balanced commercial base to serve the County.
- Some recommended LI land bays are contiguous to data center applications in areas well supported with electric and fiber infrastructure. Where data center siting is recommended,

the Plan offers land use continuity and uses natural boundaries to define appropriate locations. Given the County has just concluded the easiest budget review in recent years, the impact and importance of data centers should be considered.

### **Rural Policy Area**

Early direction from the Board was to avoid changes to the Rural Policy Area (RPA). This Plan supports maintaining the rural atmosphere and attractiveness of the RPA. Numerous strategies and action included in the Plan strengthen the means to maintain the rural character and economy in the RPA.

- There are no proposed changes to residential density anywhere in the RPA.
- There are no changes to planning policies related to Towns within the County or the related JLMAs.
- One minor change to the RPA involves moving some pieces of land into the TPA. The residential parcels are surrounded by intense development already occurring and including schools, shopping centers, the Sportsplex and PDH zoning. One bay is located on a major transportation corridor and located between residential developments. It is reasonable to add much needed flex industrial space here to offset that which is being taken by data centers.
- Water resources are a significant issue in rural areas and the Plan addresses historic issues specific to various geologies, supports Town capacity planning and service provisioning and seeks the most appropriate solutions to protect and maintain water resources.

### **Conclusion**

Not all commissioners agree universally with every recommendation in the Loudoun 2040 Comprehensive Plan. Debate exists on several topics but all decisions and recommendations in the Plan were subject to a vote of the attendees and reflect the majority view. Moreover, land use planning is about achieving a balance and to that end, the overall benefits conveyed in this Plan outweigh individual matters raised.

Furthermore, it warrants affirming the obvious; that this document is a plan. It must be reviewed regularly (five years by statute) to remain relevant and address yet unforeseen issues. By example, the Revised General Plan, only 18 years old, has no mention of data centers, which is a statement as to the pace of change. Understanding and responding to future change may be even more important in sustaining the durability of this Plan as Loudoun County continues to mature over the next two decades.

The Loudoun County Planning Commission