



HARRIS TOWNSHIP

Request to Submit a Development of Regional Impact Application – Hawk Ridge

Harris Township Planning Commission

Revised June 4, 2019



REQUEST TO SUBMIT A DEVELOPMENT OF REGIONAL IMPACT APPLICATION – HAWK RIDGE

At their April 8, 2019 meeting, the Harris Township Board of Supervisors discussed Tom Songer's request to submit a Development of Regional Impact application for a potential development on Academy Street. Mr. Songer owns several properties along Academy Street, and an adjacent parcel with frontage on Torrey Lane, and is interested in developing single-family residential dwellings on the land. Mr. Songer would like the properties included within the Regional Growth Boundary and Sewer Service Area so that any future development can be served by public sewer. At their April meeting, the Board of Supervisors was provided with a memo from Mr. Songer as well as a map that depicts a development concept for the properties. After a lengthy discussion and public comment period, the Board of Supervisors voted 3-2 to forward the request to the Planning Commission for review and recommendation.

Requests to extend the Regional Growth Boundary and Sewer Service Area are fairly uncommon in the Centre Region and as a result, appointed and elected officials may be unfamiliar with the Development of Regional Impact (DRI) review and approval process. This memo is intended to provide information on Developments of Regional Impact and the process by which they are reviewed and acted upon. This memo also includes Staff's evaluation and recommendation regarding Mr. Songer's potential request.

DEVELOPMENT OF REGIONAL IMPACT OVERVIEW

The Townships of College, Ferguson, Halfmoon, Harris, and Patton and the Borough of State College, commonly referred to as the six Centre Region municipalities, began cooperatively planning for future growth and development in the mid-1960s. Since the mid-1970s, the six Centre Region municipalities have adopted and maintained a multi-municipal comprehensive plan that includes long-range planning policies for the entire Region. A key policy of the Centre Region Comprehensive Plan, which was last updated in 2013, is the establishment of a Regional Growth Boundary. This boundary is used to delineate where the majority of future growth will be directed in the Centre Region. The boundary is primarily implemented by local zoning ordinances, which limit development in rural areas to rural densities.

In addition to utilizing a multi-municipal comprehensive plan, the six Centre Region municipalities have also adopted and maintain a regional Act 537 Sewage Facilities Plan, which identifies how wastewater will be treated throughout the Region. This plan includes the delineation of a Sewer Service Area, which identifies where public sewer service will be provided. Areas outside of the Sewer Service Area must rely on on-lot septic treatment and cannot connect to public sewer, unless mandated by the Pennsylvania Department of Environmental Protection.

While the Regional Growth Boundary (RGB) and Sewer Service Area (SSA) are established in separate planning documents, these two areas are coterminous. In 2006, the six Centre Region municipalities adopted the Centre Region Growth Boundary and Sewer Service Area Implementation Agreement that defines how the municipalities will administer the RGB and SSA, including any requests to expand the boundary. A Development of Regional Impact, commonly referred to as a DRI, includes any request to expand the RGB and SSA. Any request to rezone or modify zoning regulations outside of the RGB and SSA can also qualify as a DRI, depending upon the maximum development density proposed in the ordinance. A revised version of the Centre Region Growth Boundary and Sewer Service Area Implementation Agreement was adopted by the Centre Region municipalities in 2013 and is attached to this report.

Following the adoption of the 2006 Regional Growth Boundary and Sewer Service Area Implementation Agreement, there have been four DRI requests to expand the RGB and SSA that have been acted upon by the six Centre Region municipalities. These requests are summarized as follows:

- **PAWS (2007, College Township)** – The Centre County Promotion of Animal Welfare and Safety (PAWS) requested an expansion of the RGB and SSA in order to develop a new facility on a 10-acre parcel. The applicant had been informed by the Pennsylvania Department of Environmental Protection that animal waste could not be discharged to an on-lot system, resulting in the request to extend the RGB and SSA. The request was approved unanimously.

- **Whitehall Road Regional Parklands (2010, Ferguson Township)** – Ferguson Township requested that RGB and SSA be expanded so that public sewer service could be provided to a proposed 100-acre regional park along Whitehall Road. The request was approved unanimously.
- **Benjamin Heights (2011, Harris Township)** – Tom Songer requested the expansion of the RGB and SSA to include a 9.01-acre parcel along Torrey Lane. At the time of the application, Mr. Songer indicated that the property would be developed with a personal care home, which was a permitted use in the underlying Forest zoning district. During the application process, Mr. Songer produced documentation that showed that a sewer assessment was paid for the parcel by a previous owner, which implied a right to public sewer service on the property. The request was unanimously approved. This property is adjacent to the properties in Mr. Songer’s potential DRI request and is included in the current development concept.
- **Calvary Baptist Church (2011, Harris Township)** – Calvary Baptist Church requested an expansion of the RGB and SSA to include 28 acres of land along Discovery Drive. Calvary Baptist wanted to construct a church and other related facilities on the property, which were permitted by the underlying zoning district. Calvary Baptist had approval for an on-lot septic system for the proposed development but wanted to utilize public sewer service. The request was initially denied by the six Centre Region municipalities on a vote of 5-1. A unanimous vote was required at that time. Calvary Baptist challenged the decision in court and the Centre Region Council of Governments ultimately settled with Calvary Baptist in 2013, allowing the RGB and SSA to be expanded to include a 15-acre parcel.

As was noted above, the Centre Region Growth Boundary and Sewer Service Area Implementation Agreement was updated in 2013. There were several major changes to the agreement at that time. There have been no DRI requests to expand the RGB and SSA since the updated agreement was adopted.

THE DRI REVIEW AND APPROVAL PROCESS

The 2013 Centre Region Growth Boundary and Sewer Service Area Implementation Agreement defines the process for review and approval of any DRI request to expand the RGB and SSA. Except for requests that qualify for the “General Forum Action Not Required” process identified in Section VI of the agreement, all requests to expand the RGB and SSA must be approved by the General Forum of the Centre Region Council of Governments (COG). The General Forum is comprised of all elected officials from the six Centre Region municipalities. If a request to expand the RGB and SSA is forwarded to the COG General Forum for review and possible action, the request can only be approved if five of the six municipalities vote in favor of the expansion. Mr. Songer’s request does not qualify under Section VI of the agreement, so the final authority to approve or deny his request resides with the COG General Forum.

Any DRI to expand the RGB and SSA must first be reviewed by the host municipality to determine if the request has merit and warrants regional discussion. While the final authority to approve or deny a request to expand the RGB and SSA rests with the six Centre Region municipalities, the host municipality is responsible for deciding whether or not any request should be given consideration at the regional level. Due to the costs and time associated with preparing a DRI, prospective applicants are asked to discuss their request with the host municipality to determine if there is support to consider an application. If the host municipality is not interested in considering an expansion of the RGB and SSA, either in their jurisdiction or at the location in question, the applicant can avoid preparing a formal DRI submission that would not receive the support of the host municipality. Mr. Songer is currently requesting feedback from Harris Township on a potential application. If Harris Township indicates that they do not support consideration of Mr. Songer’s request, there would be no need for a formal application to be prepared.

If the host municipality supports the submission of a DRI application, the applicant must prepare a formal DRI request that includes all required information outlined in the 2013 Centre Region Growth Boundary and Sewer Service Area Implementation Agreement. The municipality can also request additional information, as needed, to analyze the request. After reviewing a formal DRI request, the host municipality must determine if they support the request moving forward for regional review and consideration. If the host municipality does not support the request, the review process ends. If the host municipality supports the request, the application would move on for regional review and possible action by the Centre Region Council of Governments.

WHAT MUST A DRI APPLICATION ADDRESS

The 2013 Centre Region Growth Boundary and Sewer Service Area Implementation Agreement provides a list of information and questions that must be addressed as part of any request to expand the RGB and SSA. Providing the required information does not give the applicant any guarantee of approval but gives the host municipality information needed to consider if the request has merit. At a minimum, the applicant must submit the following information in their DRI application:

1. The applicant must address the following questions in the application to expand the Regional Growth Boundary and Sewer Service Area:
 - a. Are there locations inside the Regional Growth Boundary that could support the proposed development? If not, explain why.
 - b. Does the University Area Joint Authority (public sewer) have capacity to serve existing development inside the Regional Growth Boundary and the proposed expansion? Please provide a letter from the University Area Joint Authority documenting capacity.
 - c. Have on-lot septic systems or other methods to provide sewer service to the property been explored? Why are these not viable methods to dispose of waste?
 - d. Are there any potential adverse public impacts of the proposed expansion and how will they be mitigated, based upon the items in Section V, subsections ii through vi?
 - e. Is the expansion contiguous with the existing Regional Growth Boundary?
 - f. Do changes in local or regional population or land use forecasts warrant an expansion? Explain how these changes necessitate the expansion.
 - g. Are there adjustments or changes in the specific location or direction of growth and development that warrant an expansion? Explain how these changes necessitate the expansion.
 - h. Are there changes resulting from goals, objectives, and policies in the Comprehensive Plan or local planning issues that warrant an expansion? Explain how these changes necessitate the expansion.
2. Effect of the Development of Regional Impact on:
 - a. Existing sewer collection, conveyance, and treatment system
 - b. Public water infrastructure
 - c. Transportation network (including bicycle and pedestrian facilities)
 - d. Public transportation system
 - e. Emergency services (for example, fire, police, and ambulance service)
 - f. Environmental features (such as soils, wetlands, streams, the aquifer, sinkholes, or similar environmental concerns)
 - g. School facilities
 - h. Adjacent land uses
3. In addition to the above noted information, the host municipality may also require information relative to fiscal impacts or specific details on transportation impacts, environmental impacts, or similar studies.
4. Economic analysis of the impact of the proposal on other areas of the community
5. Quality of life issues and the value the proposal would add to the community
6. The consistency of the proposal with the Centre Region Comprehensive Plan

The host municipality has the right to request additional information and analysis, as needed, to consider the request. Additional information and analysis can also be requested during regional review if the application is supported by the host municipality.

In addition to providing the information outlined above, the applicant must also provide specific details on the proposed use of the land. If a DRI is approved, the host municipality must enter into a project specific development agreement with the property owner or developer that is requesting the expansion of the RGB and SSA. A project specific development agreement is used to ensure the land development occurs as proposed. For a specific development agreement to be entered into by the developer and the municipality, the proposed land development associated with the DRI request would need to substantially comply with the Township's zoning regulations.



Photo of Hawk Ridge Property

THE CURRENT REQUEST

Tom Songer is requesting that the Board of Supervisors support the preparation of a Development of Regional Impact to expand the Regional Growth Boundary (RGB) and Sewer Service Area (SSA) to include approximately 40 acres of land located adjacent to Academy Street. If ultimately approved by the Centre Region Council of Governments, this would allow development on the land to be served by public sewer. Mr. Songer has indicated that he intends to develop the land, along with several adjacent parcels already within the RGB and SSA, into single-family residential lots.

In an April 3, 2019 memo to the Harris Township Board of Supervisors, Mr. Songer indicated that the proposed development would consist of 60 dwelling units. A concept plan for the development was included with the memo. Approximately 22 of the 60 proposed lots would be located on property already located inside of the RGB and SSA. According to the memo, 38 of the units shown on the concept plan would be located on property that is currently outside of the RGB and SSA. Mr. Songer also states in his memo that the development concept could change over time and that he requests approval to develop as many as 49 single-family residential lots on the land area currently located outside of the RGB and SSA.

The request was forwarded by the Board of Supervisors to the Planning Commission for review and recommendation. At this time, the Planning Commission is being asked to provide a recommendation on whether the Township should support the preparation of a DRI application for the properties in question. Supporting the preparation of a DRI application does not equate to support for extending the RGB and SSA but does imply that the Township is willing to consider such an expansion and needs more information prior to doing so.

The following sections provide information on the properties that would be included in the DRI request as well as properties that are included in the concept development plan. These properties are collectively referred to as the “Songer Properties” throughout this section. The bolded property areas are those that Mr. Songer would like included in the RGB and SSA.

Property Information

The map and table below shows the location of the Songer properties, their acreages, and current zoning designations.



Map ID	Tax Parcel #	Acreage	RGB/SSA Status
1	25-013A,064-,0000-	1.54	Inside
2	25-013A,100A,0000-	3.72	Partially Inside
3	25-004-,042B,0000-	30.00	Outside
4	25-004-,041-,0000-	8.93	Outside
5	25-004-,043C,0000-	9.06	Inside

Natural and Environmental Features

The Songer Properties include several natural and environmental resources including intermittent or perennial streams, wetlands, and woodlands. These features are illustrated on the map below. Any future development on the properties would need to comply with the Township's riparian buffer regulations, which would apply to streams and wetlands. Protection of some woodlands could also be required if the Township adopts the current rural zoning district proposals.



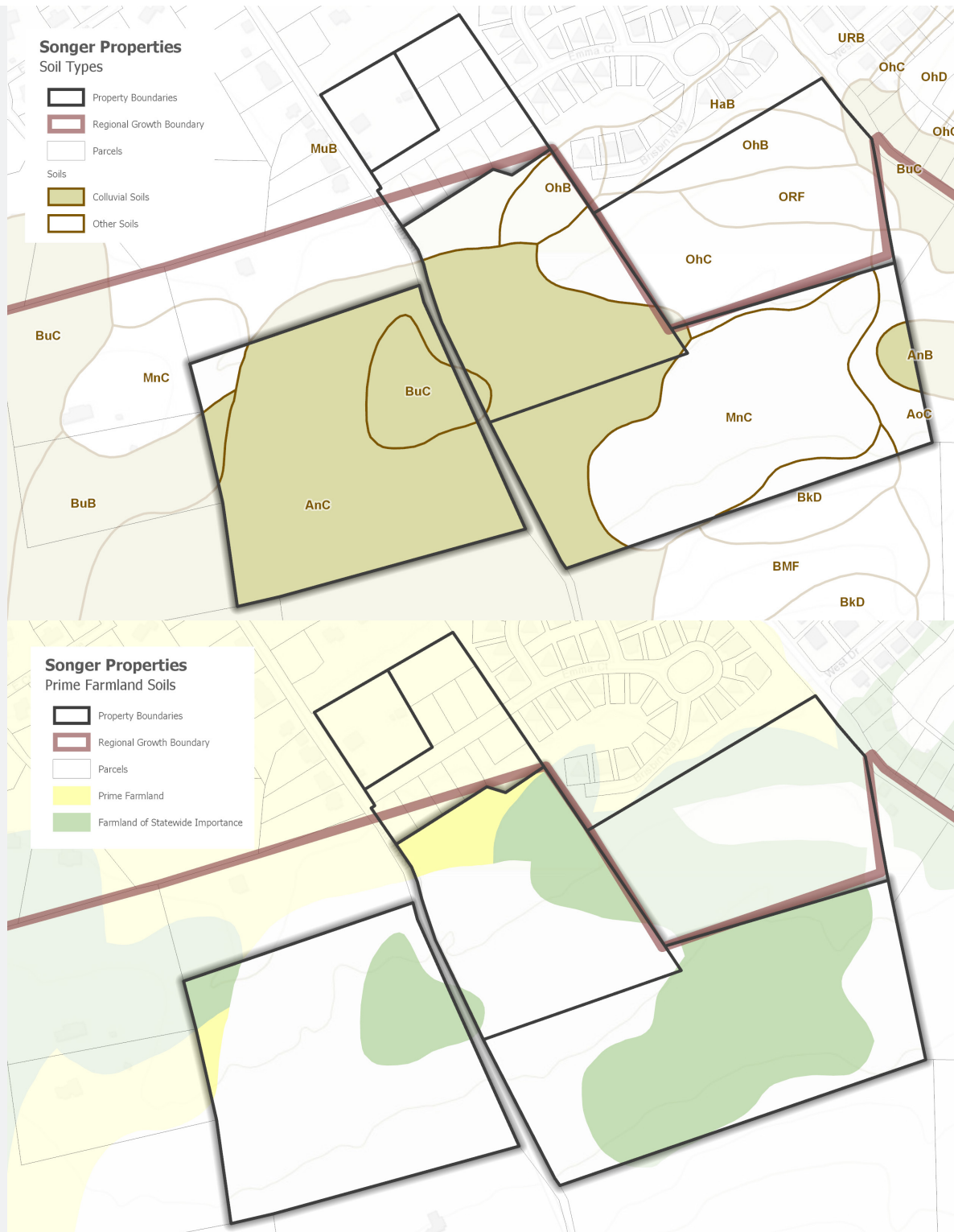
Slopes

Several areas of the Songer Properties are comprised of steep slopes. The Township currently prohibits development on all slopes of 25 percent or more. Development is also limited on slopes of 15-24.99 percent in the current Ridge Overlay District, which applies to the Forest zoning district. If the Township adopts the proposed rural zoning districts and regulations, development on 15-24.99 percent slopes would be regulated throughout the Township. As shown on the map below, the Township's slope regulations could impact development on all properties.



Soils

The map below illustrates the locations of colluvial soils (Andover, Buchanan, and Laidig) on the Songer Properties. Development on colluvial soils is regulated through the Township's Ridge Overlay District requirements. Any development involving colluvial soils would need to comply with these additional regulations.



The map (left) illustrates the locations of Prime Agricultural and Farmland Soils of Statewide Importance on the Songer Properties. If the Township adopts the current rural zoning district proposal, some of these soils may need to be protected from development through the proposed Conservation Design regulations.

Current Zoning

The Songer Properties are currently located in the Single Family Residential (R1) and Forest (F) Zoning Districts. The portions of the Songer Properties within the R1 district are limited to areas currently within the RGB and SSA. The current zoning for the Songer Properties is illustrated on the map below.



The following table illustrates the density, lot sizes, and open space requirements in the Forest zoning district, both with and without public sewer service.

		Maximum Density	Minimum Lot Size	Minimum Open Space Required
Inside RGB and SSA	Lots of 10 acres or more	2 dwelling units per acre	7,500 sq ft	30%
	Lots of 10 acres or less	1 dwelling unit per acre	1 acre	None
Outside RGB and SSA	Lots of 10 acres or more	1 dwelling unit per acre	20,000 sq ft	50%
	Lots of 10 acres or less	1 dwelling unit per acre	1 acre	None

Expanding the RGB and SSA to include the 40 acres identified in Mr. Songer's concept development would increase the maximum development density on the Forest zoned Songer Properties that are 10 acres or larger in size. At this time, only one parcel of the Songer Properties is more than 10 acres in size however all properties could be consolidated into one large lot prior to development, increasing the overall maximum density of the rurally zoned Songer Properties to two (2) dwelling units per acre.

Proposed Zoning

The Planning Commission recently completed drafting new rural zoning district regulations that if adopted, would result in zoning designation changes for the Songer Properties that are currently in the Forest district. The proposed zoning map for the Songer Properties is shown below.



If the proposed rural zoning regulations are adopted, the Songer Properties that are currently zoned Forest would be located in the revised Agricultural District. Any residential development on these properties, either with their existing acreage or if combined, would need to comply with the proposed Conservation Design Subdivision regulations. The Conservation Design Subdivision regulations would require the preparation of a yield plan for the property or properties on which development is proposed and the applicant would need to choose a development option outlined in the ordinance. The maximum development density in any Conservation Design subdivision, whether served by public sewer or on-lot septic, is one (1) dwelling unit per acre. The following table provides an overview of the Conservation Design development options:

	Country Lots	Estate Lots	Density-Neutral Lots	Density Bonus Lots	Village Lots
Minimum Lot Size	10 acres	3 acres	0.5 acre	0.3 acre	7,500 sq ft
Maximum Lot Size	None	4.9 acres	1.5 acre	1 acre	0.5 acre
Open Space Required	None	40%	60%	70%	80%

The proposed Conservation Design Subdivision Regulations also permit a flex lot option, which allows for a blending of the options shown in the table above.

Zoning Compliance

Any development proposal related to a DRI request must be able to comply with the Township's zoning regulations in order to be incorporated into a development agreement between the applicant and the Township. At this time, it is unclear if the concept development plan would comply with either the current or proposed rural district regulations.

Maximum Development Potential

The maximum development potential of any parcel or parcels is largely dependent upon the underlying zoning regulations as well as the physical characteristics of the land. The availability of public sewer service can have a significant impact on the development potential on a property. Properties outside of the RGB and SSA must rely upon on-lot septic service and the availability of suitable soils can greatly impact the maximum development density of a parcel.

Staff calculated the maximum development potential of the Songer properties that are currently located in the Forest Zoning District. These calculations do not consider other physical characteristics or the ability to provide adequate on-lot septic facilities. The Benjamin Heights Tract (property #5 on page 6), which is already in the RGB and SSA, is included in these several of these calculations due to the potential for a future lot consolidation.

	Property Scenario (refer to map on page 6)	Maximum Development Potential	
		Without RGB/SSA Expansion*	With RGB/SSA Expansion
Current Zoning	Existing Lot Configuration (Lots 3-4)	38	68
	Consolidation of Lots 3 and 4	38	76
	Consolidation of Lots 3, 4, and 5	47	94
Proposed Zoning	Existing Lot Configuration (Lots 3-4)	38	38
	Consolidation of Lots 3 and 4	38	38
	Consolidation of Lots 3, 4, and 5	47	47

*Any development of 15 EDUs or more must be served by a Community On-Lot Disposal (COLD) system

On-Lot Septic Requirements for Developments outside of the RGB and SSA

The 2013 Centre Region Growth Boundary and Sewer Service Area Implementation Agreement provides specific on-lot septic requirements for developments outside of the RGB and SSA. The agreement includes requirements for developments that propose a cumulative total of 15 or more dwelling units. The 2013 agreement states the following

"Developments outside of the RGB and SSA that propose a cumulative total of 15 or more Equivalent Dwelling Units (EDUs), and where any individual lot is less than two acres, shall utilize a community on-lot sewage disposal system (as defined by the Pennsylvania Department of Environmental Protection) designed and maintained according to the standards of the University Area Joint Authority. The University Area Joint Authority, however, will not be required to perform day-to-day operations on such facilities. For phased developments, this requirement will apply to developments that reach a cumulative total of 15 Equivalent Dwelling Units."

If the RGB and SSA are not expanded to include the entirety of the Songer Properties, any development outside of the RGB and SSA that includes more than 15 dwelling units would need to be served by a community on-lot disposal system that utilizes soils for remediation. The 2013 Implementation Agreement does not permit the use of alternative public wastewater treatment systems.

It is unclear if the Songer Properties outside of the RGB and SSA have adequate conditions to support both a primary and backup site for a community on-lot disposal system. If the properties are unable to support such a system, the maximum density would be limited to less than 15 dwelling units.

Comprehensive Plan Policy

The 2013 Centre Region Comprehensive Plan provides long-range planning policies for the six Centre Region municipalities. The general time horizon of a comprehensive plan is 20-30 years. The 2013 Comprehensive Plan includes numerous goals, objectives, and policies related to the RGB and SSA. This section provides an overview of several of these policies:

Regional Growth Boundary and Sewer Service Area (Policy Decision 1) – *“The Regional Growth Boundary and Sewer Service Area is the one tool that may have the most influence upon where growth occurs in the Region. Although the location of the Regional Growth Boundary appears as a boundary on a map, it is more. It informs a growth management strategy designed to direct growth that requires urban services to those areas currently served by infrastructure, and to use existing infrastructure in a fiscally sound manner. Growth may currently occur outside the Regional Growth Boundary, but public sewer will not be provided unless unanimously approved by the General Forum. Currently, any property owner outside the Regional Growth Boundary and Sewer Service Area can request an expansion of the boundary. Policy issues for the Centre Regional Planning Commission and the COG Transportation and Land Use Committee to consider are (1) if and when the Regional Growth Boundary and Sewer Service Area should be expanded and (2) how to balance proposed expansions of the Regional Growth Boundary and Sewer Service Area with agricultural preservation, natural resource preservation, energy efficiency, workforce housing, redevelopment, residential density, and neighborhood protection.”*

Location of Residential Development (Policy Decision 7) – *“Another consideration was the impact that suburban and large-lot residential subdivisions have on development patterns in the region. This issue is also related to and may influence transportation, housing, energy efficiency, and land use issues (like other policy issues). The ability to have a rural lifestyle within a few minutes of Penn State University and other amenities is highly valued by many residents in the region. Others believe that residential lots of an acre or more disrupt the traditional rural development pattern and diminish the viability of the agricultural heritage of the region. The Centre Regional Planning Commission and the COG Transportation and Land Use Committee considered policies that continue this pattern as well as those that direct growth into the existing Regional Growth Boundary, reducing impacts on prime agricultural areas and natural areas.”*

Land Use Objective 2.1 - Maintain a Regional Growth Boundary within which development is encouraged and urban sprawl is minimized.

The RGB is intended to delineate areas of the Centre Region where either higher density development or rural uses will be encouraged and supported by zoning. Land inside the RGB supports urban services such as roads, water and sewer systems, parks, schools, and fire and police protection that create places to live, work, and play. Land outside the RGB is generally used for farming, forests, or large-lot single-family development at a density that does not require public sewer. By expanding the RGB to include all the Songer Properties, the Township is indicating that this area is no longer intended for development at rural densities.

Land Use Policy 4.2.2 - Locate new housing concentrations within the Regional Growth Boundary to minimize cost and impacts on the Centre Region municipalities and residents.

This policy encourages the development of new housing concentrations within the RGB. Housing can be developed at higher concentrations by utilizing public sewer service.

Housing Objective 1.1 - Ensure that sufficient, appropriately zoned land is available within the Centre Region to serve the forecast population growth and housing demand for the next 20 to 30 years.

As indicated by the 2013 Regional Development Capacity Report, adequate land area exists inside the RGB and SSA to serve forecasted population growth and housing demand for the year 2040 and beyond.

Housing Objective 3.1 - Direct new residential development to sites within the Regional Growth Boundary and Sewer Service Area to facilitate convenient access to schools, jobs, medical facilities, shopping, and public transit services.

The RGB and SSA have been established to identify where growth and development should occur to take advantage of existing infrastructure and services such as public transit, public water, public sewer, and retail centers. By encouraging growth and development within the RGB and SSA, the Centre Region can limit the need to expand services prematurely and protect sensitive resources outside of the established growth areas.

Regional Development Capacity

As noted in the 2013 Centre Region Comprehensive Plan, the Centre Regional Planning Agency maintains a Regional Development Capacity (REDCAP) Report that estimates whether sufficient vacant land to support future development exists within the RGB and SSA. The REDCAP Report compares the amount of development capacity inside of the RGB and SSA to population growth and non-residential development forecasts established in the Centre County Growth Forecast 2040. The REDCAP Report was first completed in 2012 and was updated in 2017.

According to the 2017 REDCAP Report, there was more than 4,000 acres of developable land inside the RGB and SSA at the end of 2017. This land area is capable of supporting over 11,000 additional residential dwelling units and over 19,000,000 square feet of non-residential development. The Centre County Growth Forecasts estimated that 8,811 new dwelling units would be constructed in the Centre Region (excluding Halfmoon Township) between 2009 and 2040. Over the past 8 years, a considerable number of new units have been constructed which would be subtracted from this estimate. Based on these figures, there is significant capacity within the RGB and SSA to support residential development beyond the year 2040.

In addition to regional calculations, the REDCAP Report includes vacant acreage and development potential at the municipal level. Per the 2017 REDCAP Report, Harris Township had a total of 384 vacant acres within the RGB and SSA. This land area is capable of supporting approximately 821 new dwelling units.

STAFF'S ANALYSIS AND RECOMMENDATION

At this time, the Planning Commission is being asked to provide a recommendation to the Board of Supervisors regarding a potential request to expand the Regional Growth Boundary (RGB) and Sewer Service Area (SSA). If submitted, Tom Songer has indicated that the request would be to expand the RGB and SSA to include approximately 40 acres of land adjacent to Academy Street. The current question before the Planning Commission does not constitute a formal request to expand the boundary but is meant to gauge the Township's willingness to even consider an expansion at this location. As was noted previously in this memo, a DRI application is costly, time consuming, and may or may not be successful. It is in the Township's and Mr. Songer's interest to determine if there is any merit to consider an expansion prior to a formal application being submitted.

Over the past 7 years, Harris Township has spent a considerable amount of time conducting long-range planning for the Township's rural areas. This planning compliments and is consistent with the 2013 Centre Region Comprehensive Plan, which establishes region-wide development policies for the six Centre Region municipalities, including a Regional Growth Boundary. In general, both the Centre Region Comprehensive Plan and the Township's long-range planning efforts have indicated that the Songer Properties currently located outside of the Regional Growth Boundary should remain zoned for rural densities that do not warrant the extension of public sewer service. Expansion of the RGB and SSA to the Songer Properties would likely result in higher density development than could be achieved without public sewer service. Expanding the RGB and SSA to this additional acreage would be inconsistent with long-range planning policies.

The 2013 Centre Region Comprehensive Plan and the 2013 Centre Region Growth Boundary and Sewer Service Area Implementation Agreement both recommend encouraging infill development as a means of supporting future growth in the Centre Region. As was indicated by the 2017 Regional Development Capacity Report, there is adequate land area in the existing RGB and SSA to support future growth to the year 2040, and beyond. While this development potential is spread across five of the six Centre Region municipalities, Harris Township has enough land area to support an additional 821 dwelling units. This residential development potential represents approximately 34 percent of the Township's existing housing stock.

The factors outlined above should not only be considered by Harris Township, but would also need to be considered by the other Centre Region municipalities should an application be submitted and supported by the Township. Due to the potential request being inconsistent with the Township's and the Region's long-range planning policies and the amount of vacant residential land within the existing RGB and SSA, Staff would recommend that the Township not support any request to expand the RGB and SSA to the 40 acres outlined in Mr. Songer's April 3, 2019 memo.