

# GROTON PLAN OF CONSERVATION AND DEVELOPMENT/MUNICIPAL COASTAL PROGRAM UPDATE

**BUILD OUT**

**DRAFT**

January 2014

Prepared for:  
Town of Groton  
Planning Commission

Prepared by:



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## ANALYSIS OF DEVELOPMENT CAPACITY

Balancing the demands for new development with the physical constraints of the landscape and existing regulatory controls can prove to be a significant challenge. Once factors such as the availability of necessary public facilities, the adequacy of road and utility infrastructure, and the protection of valuable natural resources are considered, the balance gets even more complicated. This challenge is compounded by the reality that there is only a finite amount of vacant land available for development. Understanding where the developable land is located within the Town of Groton (the Town) and how much development can be accommodated based on existing regulatory controls and physical constraints on the landscape is the first step in establishing a development plan for the future. Once this is accomplished, issues such as infrastructure limitations and natural resource protection can be considered and new growth can be properly planned. This analysis has been undertaken for the entire Town, including the zoning districts in the City of Groton, Groton Long Point, and Noank, and the appropriate zoning and subdivision regulations have been used.

The analysis of development capacity is expressed as potential dwelling units in vacant lands zoned for residential uses, and as total area of vacant lands in non-residential zones. These development capacity calculations represent a reasonable scenario of growth under a scenario where all available and reasonable land has been built upon, following existing zoning and building limitations.

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### LAND ANALYSIS

As calculated in the Land Use Memorandum, 13.9% of the Town is classified as Vacant Land and 6% is classified as Agricultural Land. Visualizing the distribution of these vacant and agricultural parcels (see Map 1) is important in order to gain an understanding of *where* future development on raw vacant land can be accommodated. By combining the zoning boundaries (See Map 2) with the vacant and agricultural land through overlays, a detailed understanding can be gained on what type of development can be produced under existing regulations. Maps 3 and 4 illustrate the relationship between existing residential zoning and the remaining vacant and agricultural parcels in the Town and their distribution is summarized in Table 1. For the residential build-out, only those parcels in residential zones have been included in the Build-Out, as highlighted in Table 1. This analysis also included a category not reflected in the Land Use memo, those single-family parcels that are large enough to be subdivided (greater than three times the minimum lot size as defined by zoning), which are referred to as Underdeveloped. These parcels are included in the Residential Development Potential analysis.

The commercial and industrially zoned lands that are currently vacant or used for agriculture have been similarly analyzed for their potential future development. These parcels are shown on Map 4 and their summary is shown in Table 4.

**TABLE 1: VACANT & AGRICULTURAL LAND ANALYSIS BY ZONING**

Zoning Category*	Acres with Zone District (acres)	Vacant & Agricultural Land (acres)	Percent of Zone Vacant & Agricultural	Percent of Total Ag & Vacant Land
Commercial	145.9	9.5	6.5%	0.3%
Industrial	2,206.4	689.0	31.2%	18.3%
Mixed ResCom	819.7	147.4	18.0%	3.9%
Mixed ResOffice	88.5	12.2	13.8%	0.3%
<b>Subtotal Non-Residential Zones</b>		<b>858.1</b>		<b>22.8%</b>
Residential Multifamily	454.1	61.6	13.6%	1.6%
Residential >1 Acre	5,712.7	1,803.0	31.6%	47.9%
Residential <1 Acre	8,538.7	1,037.8	12.2%	27.6%
<b>Subtotal Residential Zones</b>		<b>2,902.4</b>		<b>77.2%</b>
<b>Total Vacant and Ag in all Zones</b>		<b>3,760.5</b>		<b>100.0%</b>

\*Zoning Categories Open/Conservation and ROW are not listed because they contain no vacant or agricultural lands

**RESIDENTIAL SUMMARY**

The majority of vacant and agricultural land in the Town is zoned Residential >1 Acre (47.9%), generally allowing single-family housing units on one acre lots or greater. The location of vacant, agriculture, and underdeveloped parcels zoned Residential are shown on Map 3.

There is also considerable residential land in the town that would be considered Underdeveloped because its current zoning would allow for further subdivision of the parcel for additional housing units. These parcels are considered Underdeveloped if their land use is Single-Family Residential and their area is at least three times greater than the minimum lot size allowed by right. There are 1,480.1 such acres in Groton, although only 1,477.3 are in single family zones. Only those parcels in single family zones have been included in the Build-Out, as highlighted in Table 2.

**TABLE 2: UNDERDEVELOPED LAND ANALYSIS BY ZONING**

Zoning Category*	Acres with Zone District (acres)	Underdeveloped Land (acres)	Percent of Zone Underdeveloped	Percent of Total Underdeveloped Land
Residential Multifamily	454.1	2.8	0.6%	0.2%
Residential >1 Acre	5,712.7	815.1	14.3%	55.1%
Residential <1 Acre	8,538.7	662.2	7.8%	44.7%
<b>Subtotal Single Family Zones</b>		<b>1,477.3</b>		<b>99.8%</b>
<b>Total</b>		<b>1,480.1</b>		<b>100.0%</b>

\*Only Residentially Zoned Land Is Included in this Analysis. Only Single Family Residential Land is Analyzed for Unit Yield in the Build-Out

Map 1 shows all of the parcels included in the Residential Build-Out analysis. These parcels include all residentially zoned lands which are vacant, agriculture, or Underdeveloped. This includes residentially zoned vacant and agriculture parcels (2,902.4 acres) and single-family Underdeveloped parcels (1,477.3 acres). These 4,379.7 acres have been analyzed for their potential to support new residential units in the future.

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## NON RESIDENTIAL SUMMARY

The Town also has a considerably large amount of vacant land zoned for Industrial uses (18.3%), especially between Route 117 and Flanders Road, north of Route 1 and south of Route 184. These vacant industrial parcels are shown on Map 4.

There are only 169.1 acres of vacant or agriculture land currently zoned for commercial or mixed uses. Commercial zones as a whole also have a much smaller percentage of their total acreage classified as vacant, making the potential for new development in these zones limited to redevelopment and assembly of underperforming and obsolete land uses. Additionally, the vacant land that does exist is largely outside of the Community Structure Nodes, as defined in the economic development section of this plan, suggesting that the possibility of new commercial development would likely be outside of those areas targeted for growth if not for infill and redevelopment. These vacant commercial and mixed-use parcels are shown on Map 4.

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## RESIDENTIAL DEVELOPMENT CAPACITY

In order to understand the development capacity of residentially zoned land in the Town, each parcel's capacity to accommodate new development is assessed based on the presence of development constraints and existing zoning. For the purpose of this study, development constraints were defined and deductions taken according to the following assumptions, and are shown in Maps 5 and 6:

- 100% deduction of FEMA 100-year floodzones
- 100% deduction of water courses and bodies
- 100% deduction of inland wetlands and tidal wetlands
- 80% deduction of steep slopes >25%
- 35% deduction of moderate slopes (15% to 24%)

Areas that contain development constraints were deducted from the gross land area for each parcel, yielding a per parcel buildable land area (unconstrained land). From the unconstrained land, 20% was factored out to account for the required internal roadways, stormwater retention, or open space offsets, to result in a Total Net Buildable Land calculation. This analysis was done for both Vacant/ Ag parcels, and residentially zoned parcels with an existing residential structure that are large enough to be subdivided (greater than three times the minimum lot size as defined by zoning), and are referred to as Underdeveloped.

From the Net Buildable Land area, the minimum lot size of the underlying residential zones was applied to yield an approximation of potential residential dwelling units for each parcel. For example, a vacant parcel with 3.5 acres of net buildable area in a 1 acre zone will yield 3 dwelling units. The remaining .5 acres does not contribute to additional dwelling unit yield. For underdeveloped parcels, any existing living units, as calculated by the Tax Assessor records, were deducted from the yield of dwelling units.

The results of this analysis are summarized in Table 3.

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## RESIDENTIAL DEVELOPMENT POTENTIAL AT FULL BUILD-OUT

The results of the residential development potential analysis indicate that, based on existing zoning, approximately 4,530 additional dwelling units could be built within the Town's residential zones at full build-out. This represents an approximate 25% increase over the 17,978 existing dwelling units enumerated during the 2010 Census. Ninety percent of these potential units are in Single Family Zones, with fewer than 500 potential units in Multifamily Zones. Potential new dwelling units are shown on Map 7.

In 2010, the Town had an average household size of 2.31; therefore, these units have the potential to increase the population by 10,464 people at full build-out, yielding a potential for a total population of 50,579.

Following the last POCD, zoning changes were made in 2002, based on recommendations from the plan, which removed two-family homes as-of-right in the RU-40 and RU-80 zones. This resulted in a decrease in the potential yield of dwelling units by an estimated 800 dwelling units in RU-40 and RU-80 zones.

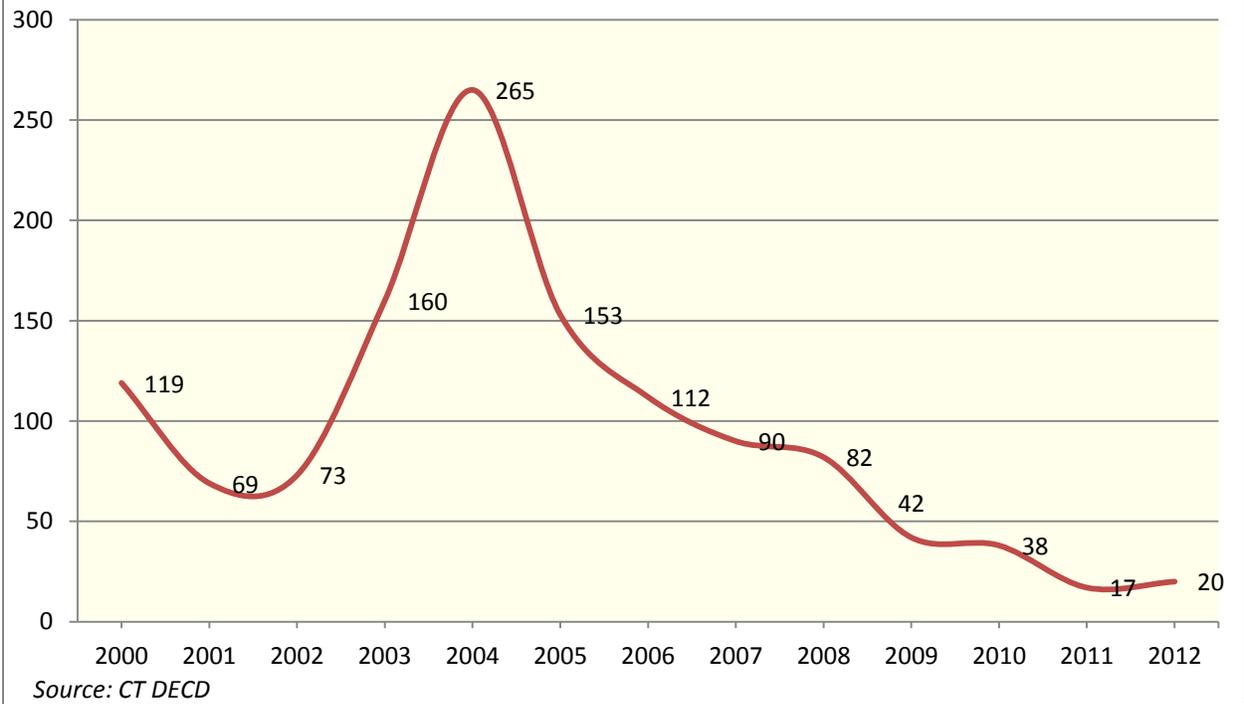
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## RESIDENTIAL DEVELOPMENT POTENTIAL FOR THE NEXT DECADE

Data from the US Census, CT Data Center, and CT DOT, as explained in the Demographics Memorandum, suggests that despite projections the population remaining around 40,000 residents for the next decade, the Town will likely see continued shrinkage in the average size of its resident households as the nature of the household unit continues to evolve. This trend will likely put upward pressure on housing demand, as fewer people per household results in the gross number of households increasing even as the total population remains stable. Additionally, shifting demand for different housing typologies as the community matures will drive the need for additional housing units. As discussed in the Housing Memorandum, between 2000 and 2011 the percentage of the Town's housing stock in single-family structures actually decreased, while the percentage of housing units in structures of two to four units increased 33% and the percentage of housing units in structures of five or more units increased 13.5%, suggesting that changing demographics and market demand may already be driving the diversification of housing typologies.

Since 2007, there has been an average of 48 annual housing permits. If this trend continues for the next ten years, there would be an estimated additional 480 units of housing built by 2023. In 2010, the Town had an average household size of 2.31; therefore, these units would have the potential to increase the population by 1,109 people.

**Figure 1: Groton Housing Permits, 2000-2012**



Looking forward, there are 432 units approved in the Town that have yet to be built, and 352 of those units are for duplex or multifamily-type units. By current zoning, there is the potential for an additional 439 units in zones that allow multi-family units; therefore, up to 80% of that by-right potential could be satisfied with units approved but not yet built.

**Table 3: Residential Development Potential  
Parcel Based Build-Out Under Full Build-Out Scenario**

Zone	Vacant/AG Land Analysis				Underdeveloped Land Analysis				Total Yield			
	Gross Raw Vacant/Ag Land (Acres) <sup>1</sup>	Vac/Ag Constrained (Acres)	Unconstrained Vacant/Ag (Acres)	Total Net Buildable Vacant/Ag 20% Deduct <sup>6</sup> (Acres)	Gross Underdeveloped Land (Acres) <sup>2</sup>	Underdeveloped Constrained Land (Acres) <sup>3</sup>	Unconstrained Underdeveloped (Acres)	Total Net Buildable Underdeveloped 20% Deduct <sup>6</sup> (Acres)	Total Net Buildable Land (Acres)	Dwelling Units from Vacant/Ag Land	Dwelling Units from Underdeveloped Lots	Total Potential Dwelling Units
RS-20	419.4	91.1	328.3	262.6	203.3	25.5	177.8	142.2	404.8	487	202	689
RS-12	83.2	25.9	57.2	45.8	110.0	28.9	81.1	64.9	110.7	128	118	246
RS-8	1.4	0.4	0.9	0.7	0.6	0.0	0.6	0.5	1.2	1	1	2
R-12	109.9	47.0	62.9	50.3	36.1	13.6	22.5	18.0	68.3	264	68	332
RU-20	332.7	75.2	257.4	205.9	184.1	27.5	156.6	125.3	331.2	567	272	839
R	4.4	2.9	1.5	1.2	5.7	4.2	1.5	1.2	2.4	4	2	6
R 5.1 <sup>4</sup>	7.7	1.6	6.0	4.8	27.8	4.2	23.6	18.9	23.7	31	85	116
R 5.2 <sup>4</sup>	22.2	4.4	17.9	14.3	32.1	0.3	31.8	25.4	39.7	105	111	216
R8 <sup>4</sup>	35.9	8.3	27.6	22.1	48.1	10.9	37.2	29.7	51.8	111	90	201
R-20 Noank	21.0	5.7	15.2	12.2	14.4	4.7	9.7	7.8	20.0	17	9	26
Single Family Zones < 1 Acre	1,037.8	262.5	774.9	619.9	662.2	119.8	542.4	433.9	1,053.8	1,715	958	2,673
R-40 Noank	123.3	35.6	87.6	70.1	46.5	10.0	36.5	29.2	99.3	71	18	89
RU-80	73.4	27.6	45.7	36.6	272.2	97.4	174.8	139.8	176.4	8	59	67
RU-40	1,606.3	365.7	1,240.6	992.5	496.4	151.8	344.6	275.7	1,268.2	996	237	1,233
Single Family Zones > 1 Acre	1,803.0	428.9	1,373.9	1,099.2	815.1	259.2	555.9	444.7	1,543.9	1,075	314	1,389
RMF-16	4.8	0.3	4.5	3.6					3.6	45		45
RMF-12	45.6	6.7	38.9	31.1					31.1	368		368
RMF-8	5.7	1.2	4.5	3.6					3.6	28		28
RM	5.5	0.6	4.9	3.9					3.9	27		27
Multi-Family Zones	61.6	8.8	52.8	42.2	N/A	N/A	N/A	N/A	42	468	N/A	468
Total <sup>5</sup>	2,902.4	700.2	2,201.6	1,761.3	1,477.3	379.0	1,098.3	878.6	2,639.7	3,258	1,272	4,530

<sup>1</sup> Includes privately owned vacant land and agricultural land

<sup>2</sup> Single family residential parcels with 3 times the minimum lot size by right

<sup>3</sup> Constrained land is summed as follows: 100% 100 year flood plain, Inland Waterways, Watercourses; 80% Steep Slopes > 25%, 35% Moderate Slopes 15% to 24%

<sup>4</sup> For Residential Zones in the City of Groton there are no defined Dwelling Units per Acres, therefore it was assumed that there could be 1 Unit per Minimum Lot Size. These zones may allow 2 Units per Building by Right, so the number of Potential Dwelling Units may be underestimated.

<sup>5</sup> Totals may be off due to repeated compound computer rounding at the parcel level

<sup>6</sup> Reflects deduction of 20% from Unconstrained Vacant, Agricultural & Underdeveloped land included in Build-Out.

## COMMERCIAL AND INDUSTRIAL DEVELOPMENT POTENTIAL

Vacant Commercial and Industrially zoned properties were analyzed to yield a potential for future development. Parcels included in the Commercial and Industrial build out are those parcels in Commercial or Industrial zones and classified as vacant or agriculture. Commercial and Industrial development was calculated under floor to area ratio (FAR) by zone by right, and under the effective FAR by zone. Floor Area Ratio is defined in the Town of Groton Zoning as, “the total floor area of a building or buildings divided by the area of the zoning lot on which it sits.”

FAR by right is what is allowed in each zone under current zoning. Where it was not specified in the zoning regulation, it was calculated using the following formula. Note that the number of stories was determined to be the allowable max building height divided by 12 and then rounded down.

$$\text{FAR by Right} = ((\text{Minimum Lot Size} * \text{Maximum Building Coverage}) * \text{Number of Stories}) / \text{Minimum Lot Size}$$

Effective FAR assumes that existing development in each zone will strongly indicate future development yield. It assumes that the maximum allowable FAR is rarely attained due to various physical and market forces, and therefore overestimates likely yield for new Commercial and Industrial development.<sup>1</sup> To contrast the maximum FAR, an effective FAR was calculated on a parcel basis for existing, developed Commercial and Industrial properties in each non-residential zone, using the assessor’s reported building square footage of each parcel. The effective FAR reflects the FAR of what is currently built on the parcel. This effective FAR was calculated for each developed Commercial and Industrial parcel, then averaged for each zone to result in an effective FAR for each zone. The effective FAR assumes the historic development use reasonably reflects what would likely occur in the future.

	Zoning Category	FAR by Right	Effective FAR	Vacant and Agriculture Land (sq ft)	Constrained Land (sq ft)	Net Buildable Land (sq ft)	Potential Building Sq Ft	
							By Right	Effective FAR
Town of Groton	OMF	0.6	0.21	508,395	21,260	487,134	292,281	102,298
	CA-12	1.5	0.18	663,459	120,687	542,773	814,159	97,699
	CA-40	0.9	0.18	13,390	6,775	6,616	5,954	1,191
	CB-15	1.8	0.18	4,374,156	946,565	3,427,591	6,814,970	616,966
	DDD		0.16	0				
	WF-20	1.3	0.10	23,613	23,613	0	0	0
	NMDD		0.08	1,143,628	328,462	815,166		65,213
	IA-40	1.2	0.13	1,411,309	1,208,147	203,162	243,794	26,411
	IP-80A	3.6	0.17	9,064,674	2,260,142	6,804,532	24,496,316	1,156,770
	IP-80B	2.8	0.09	16,457,273	3,387,661	12,769,611	37,349,593	1,149,265
IP-80C	2.8	0.09	3,355,695	1,550,011	1,805,684	5,055,915	155,023	
City of Groton	GC	2.1	0.42	320,244	23,641	296,603	622,867	124,573
	GI	4.2	0.20	23,265	0	23,265	97,715	4,653
	RI	2.4	0.59	0				
Noank	VC		1.13	0				
	WC		0.13	0				
	WDD	1.95	0.93	0				
<b>Total Commercial</b>				<b>7,046,885</b>	<b>1,471,002</b>	<b>5,575,883</b>	<b>8,550,230</b>	<b>1,007,941</b>
<b>Total Industrial</b>				<b>30,312,217</b>	<b>8,405,962</b>	<b>21,606,254</b>	<b>67,243,333</b>	<b>2,492,123</b>
<b>Total</b>				<b>37,359,102</b>	<b>9,876,964</b>	<b>27,182,137</b>	<b>75,793,563</b>	<b>3,500,064</b>

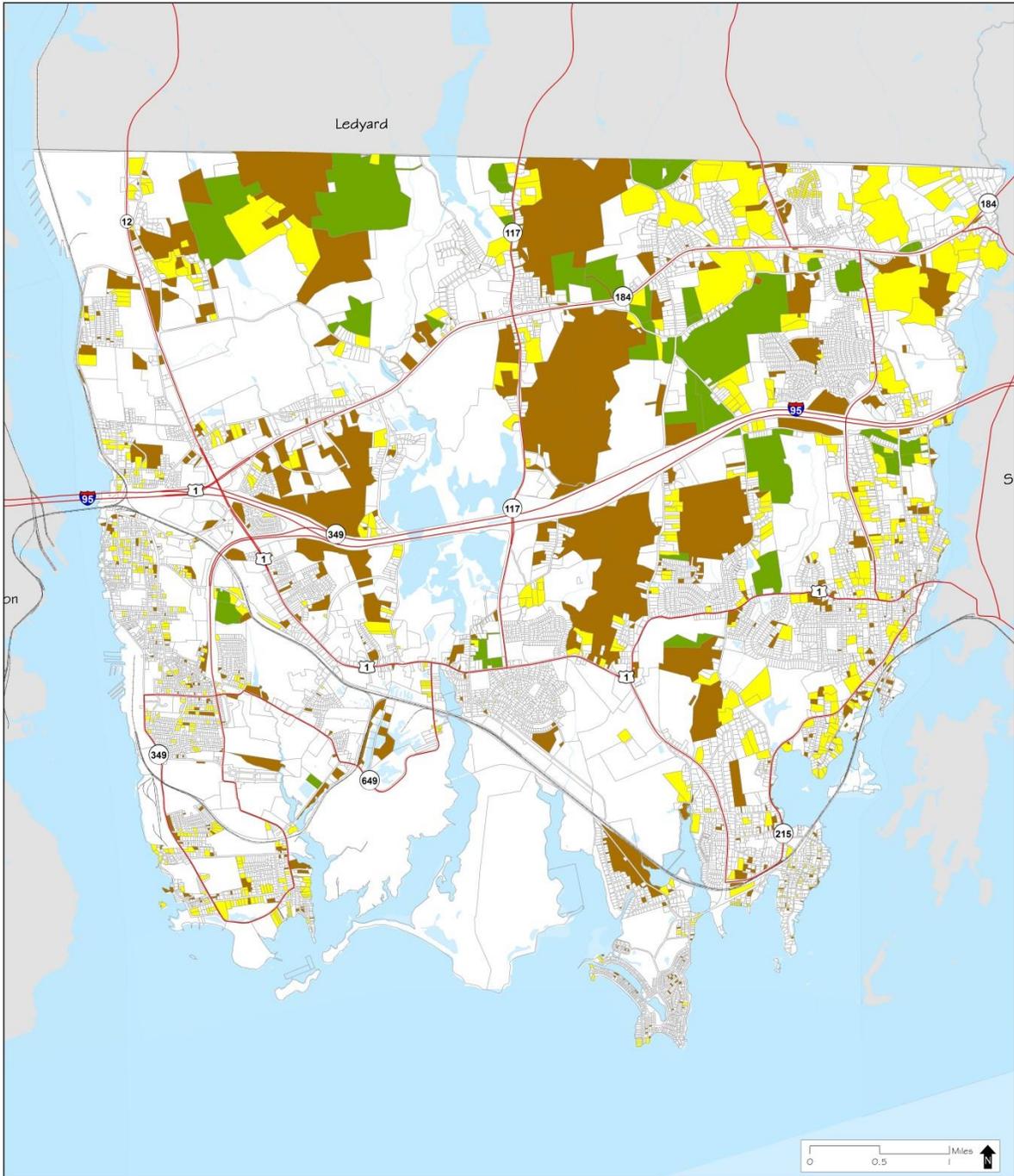
<sup>1</sup> In this analysis, physical constraints such as steep slope and wetlands were excluded from the calculations; however the resultant Net Buildable Area is often non-contiguous. For example if a river bisects a parcel, the river and its floodplain are excluded, however, the half of the parcel cut off from road access by the river would be considered as part of the net buildable area, and therefore the square footage calculation would include both halves of the parcel including the half of the parcel that is not useable for development. In Groton, the Commercial and Industrial zones are defined tightly, therefore the effective FAR is assumed to account for the topography and geography of each zone.

The effective FAR yielded a potential for approximately 1 million square feet of new commercial development, and 2.5 million square feet of new industrial development. In contrast, the FAR by Right yielded 6 million square feet of potential new commercial development and over 67 million square feet of industrial development, as shown in Table 4. These potential developments are shown on Map 8.

## FINDINGS

- \$ Groton has the potential to add an additional 4,530 housing units under a full build-out scenario.
- \$ There is potential for 1,272 dwelling units from subdivision of Underdeveloped existing single-family residential lots.
- \$ There is potential for 3,258 dwellings on raw vacant or agricultural lands.
- \$ 90% of the potential units would be single family houses.
- \$ There is limited potential for new units in multifamily developments (468 units).
- \$ There is potential for 1-6 million square feet of new commercial development, mostly along Route 184.
- \$ There is potential for 67 million square feet of new industrial land (by right), most in the area between 117 and Flanders Road, however under current development densities, it is more likely only 2.5 million square feet could be built.
- \$ Much of the vacant, underdeveloped, or Ag land in the Town is north of Route 184, along the Ledyard border, on large residentially-zoned parcels, or in the industrial area between Route 117 and Flanders Road, zoned Industrial.

# MAP 1: VACANT, UNDERDEVELOPED, AND AG LAND MAP





**Town of Groton**  
Plan of Conservation &  
Development Update  
Vacant, Ag, and Underdeveloped  
Land Map

**Lands Included in Build-Out**

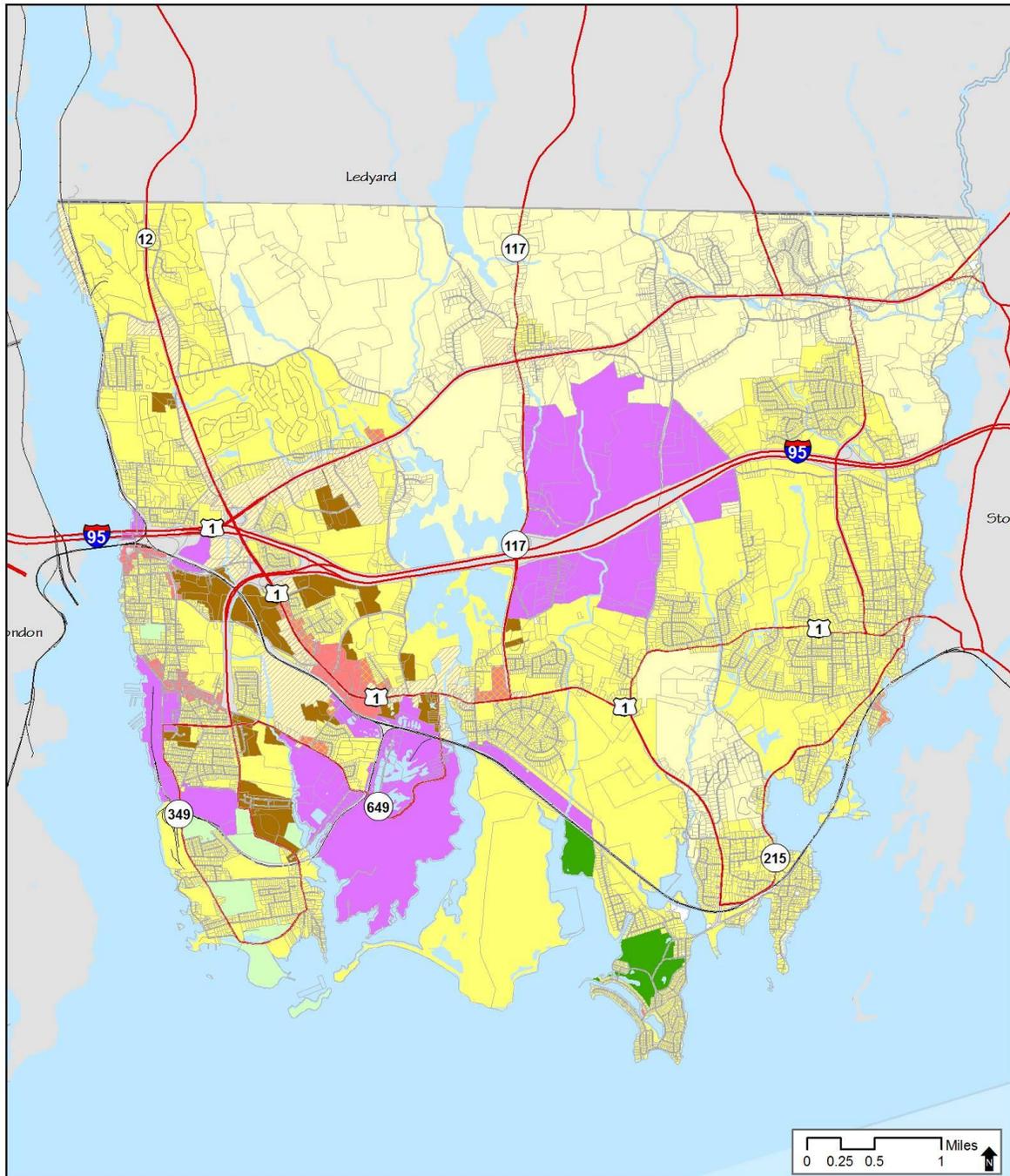
- Ag
- Underdeveloped
- Vacant

Source:  
 \* Parcels, Street Centerlines:  
 Town of Groton Geographic Information Systems Dept.  
 † Database: State Connecticut Department Of Environmental  
 Protection Map 4 Geographic Information Center (2012)  
 This map was developed for use as a planning  
 document. Distortions may not be exact.

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Date: November 2013

## MAP 2: CURRENT ZONING CLASSIFICATIONS



Existing Zoning Classifications



### Zoning Classifications

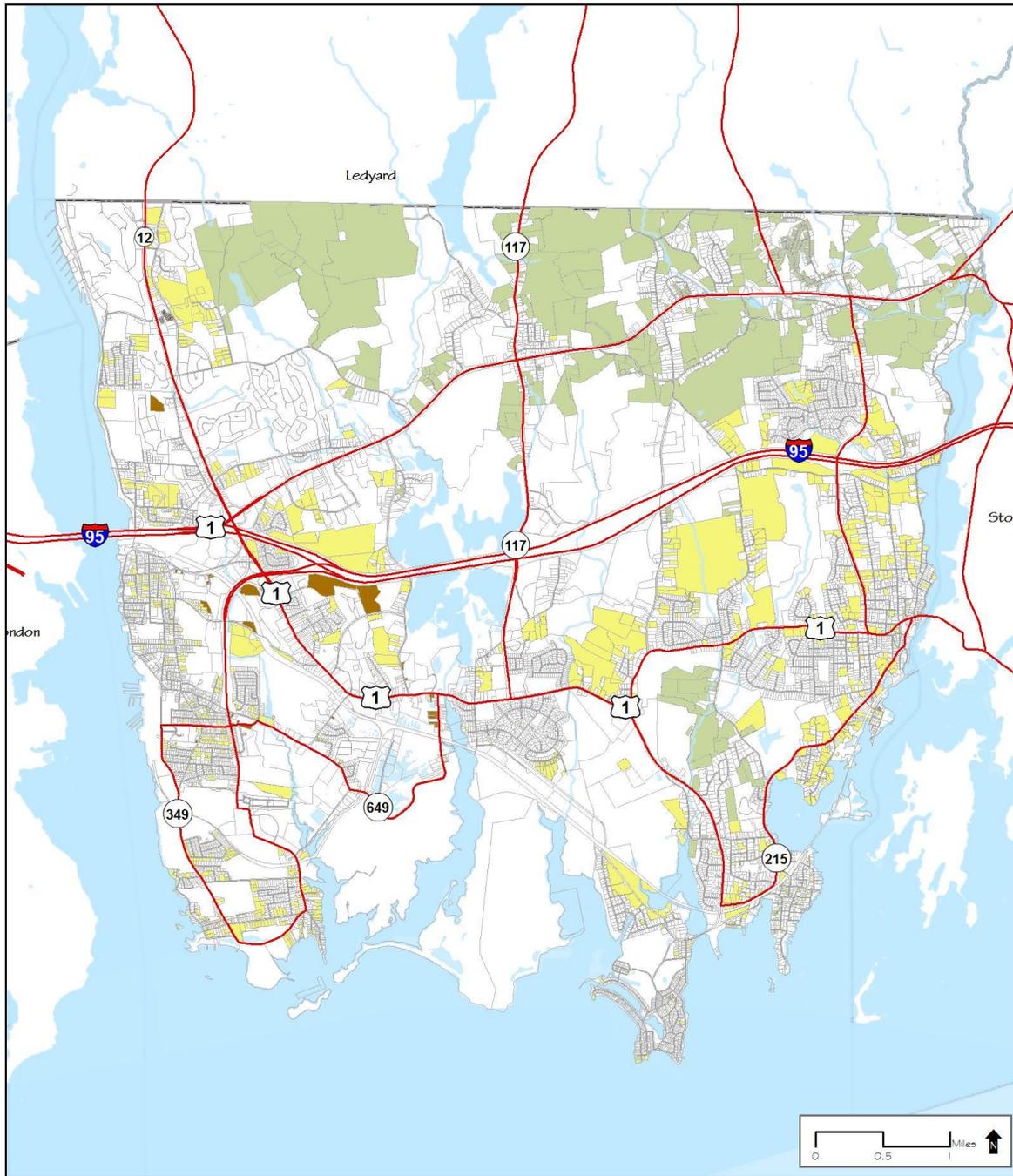
None	CM, DDD, GC, NMDD	Open Space: Recreation	ROS
Commercial	GI, IA-40, IP-80A, IP-80B, IP-80C, RI	Right of Way	ROW
Industrial	CA-12, CA-40, CB-15, VC, WC, WDD	Multifamily Residential	RM, RMF-12, RMF-16, RMF-8
Mixed Use: Res/Comm	OMF, WF-20	Rural Residential	R-40, RU-40, RU-80
Mixed Use: Res/Office	CV, Flood Plain	Single Family Residential	R, R-12, R-20, RU-20, RS.1, R8, RV
Open Space: Conservation		Two Family Residential	R-12, R-20, RS.2, WBR

Date: November 2013

Source:  
 \* Parcels, Street Centerlines:  
 Town of Groton GIS Data;  
 \*Zoning, Town of Groton Zoning Regulation,  
 City of Groton POCD,  
 Noank Fire District Zoning Ordinance,  
 Groton Long Point POCD  
 \* Basemap Data: CT DEP Map &  
 Geographic Information Center (2012)

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### MAP 3: RESIDENTIALLY ZONED VACANT, UNDERDEVELOPED, OR AG LAND



**Town of Groton**  
*Plan of Conservation &  
 Development Update*

Residentially Zoned  
 Vacant, Ag, and  
 Underdeveloped Land Map

#### Vacant, Ag, and Underdeveloped Land by Zoning

- Multifamily Residential
- Single or Two Family > 1 ac
- Single or Two Family < 1 ac

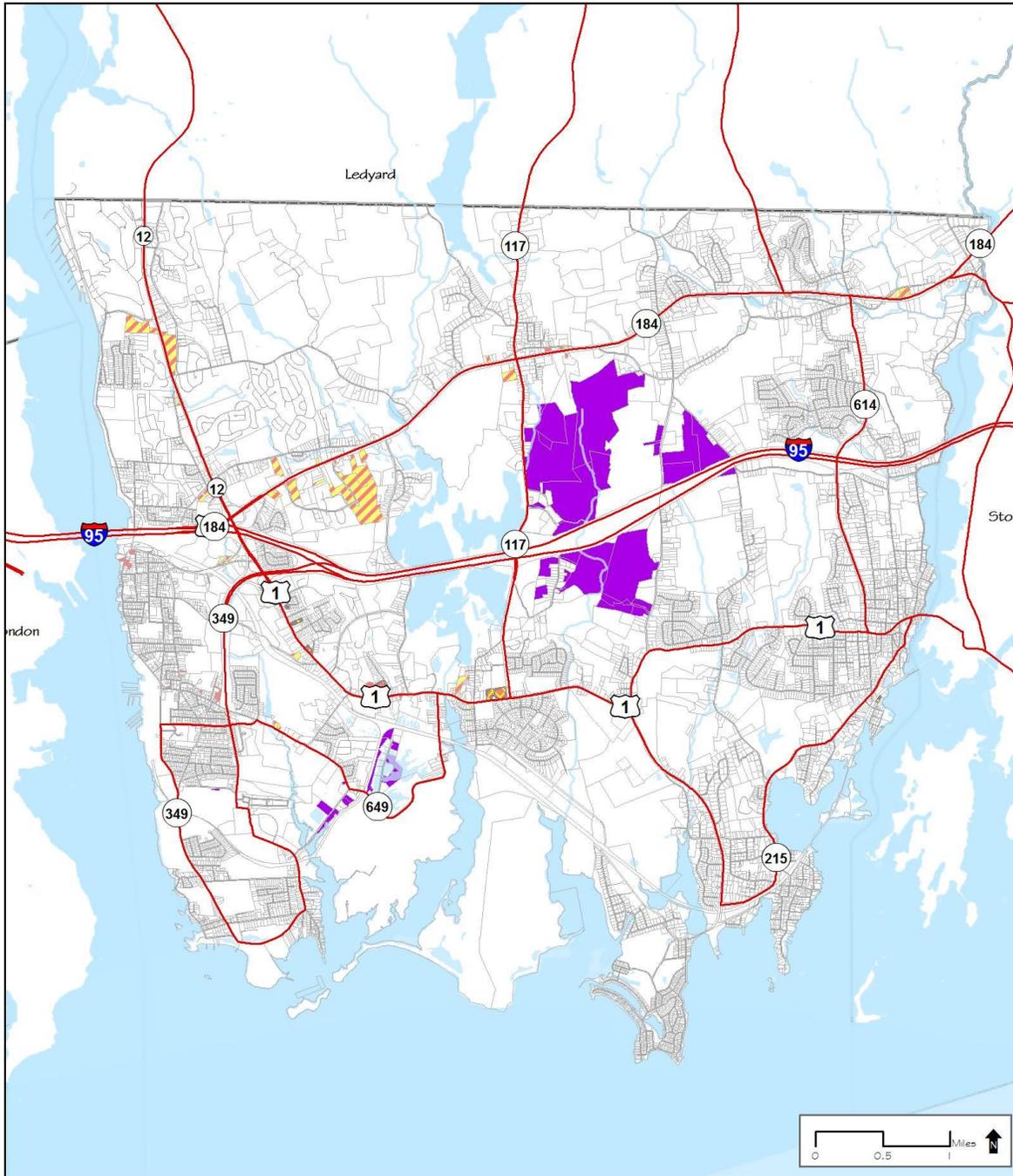
Sources:  
 \* Parcels, Street Centerlines:  
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Date: November 2013



# MAP 4: COMMERCIAL, MIXED USE, AND INDUSTRIAL ZONED VACANT, UNDERDEVELOPED, OR AG LAND



**Town of Groton**

*Plan of Conservation & Development Update*

Commercial, Mixed Use, and Industrial Zoned Vacant and Underutilized Land Map

### Vacant and Underutilized Land by Zoning

- Industrial
- Commercial
- Mixed Use: Res/ Comm
- Mixed Use: Res/ Office

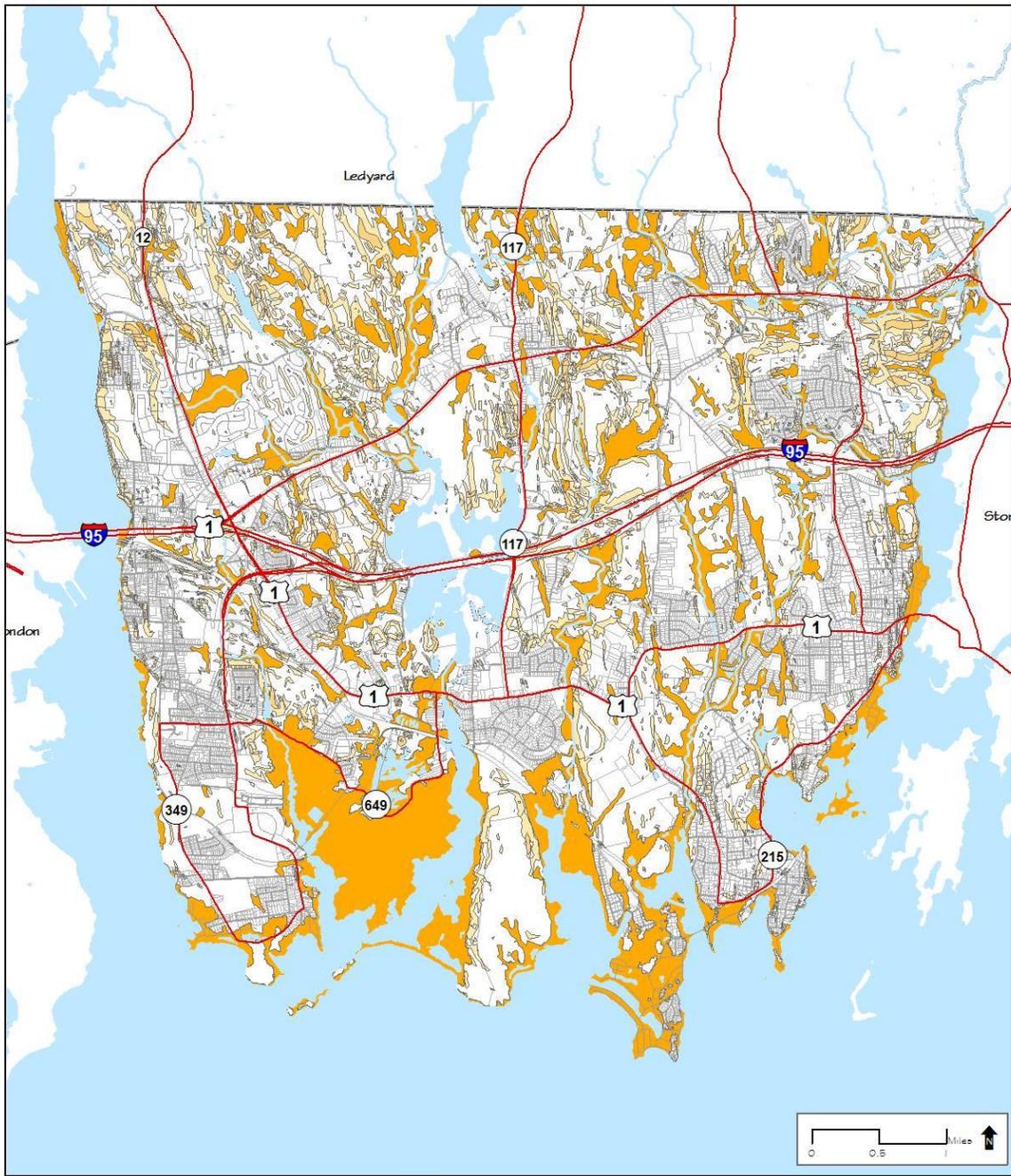
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 \* Parcels, Street Centerlines:  
 Town of Groton GIS Dept.  
 \* Basemap Data: CT DEP Map &  
 Geographic Information Center (2012)

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# MAP 5: CONSTRAINED LAND




**Town of Groton**  
*Plan of Conservation & Development Update*

Physically Constrained Land

### Constrained Land

-  100% Deductions: 100 Yr Floodzones, Inland and Tidal Wetlands, Water Courses
-  80% Deductions: Slopes >25%
-  35% Deductions: Slopes 15-24%

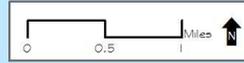
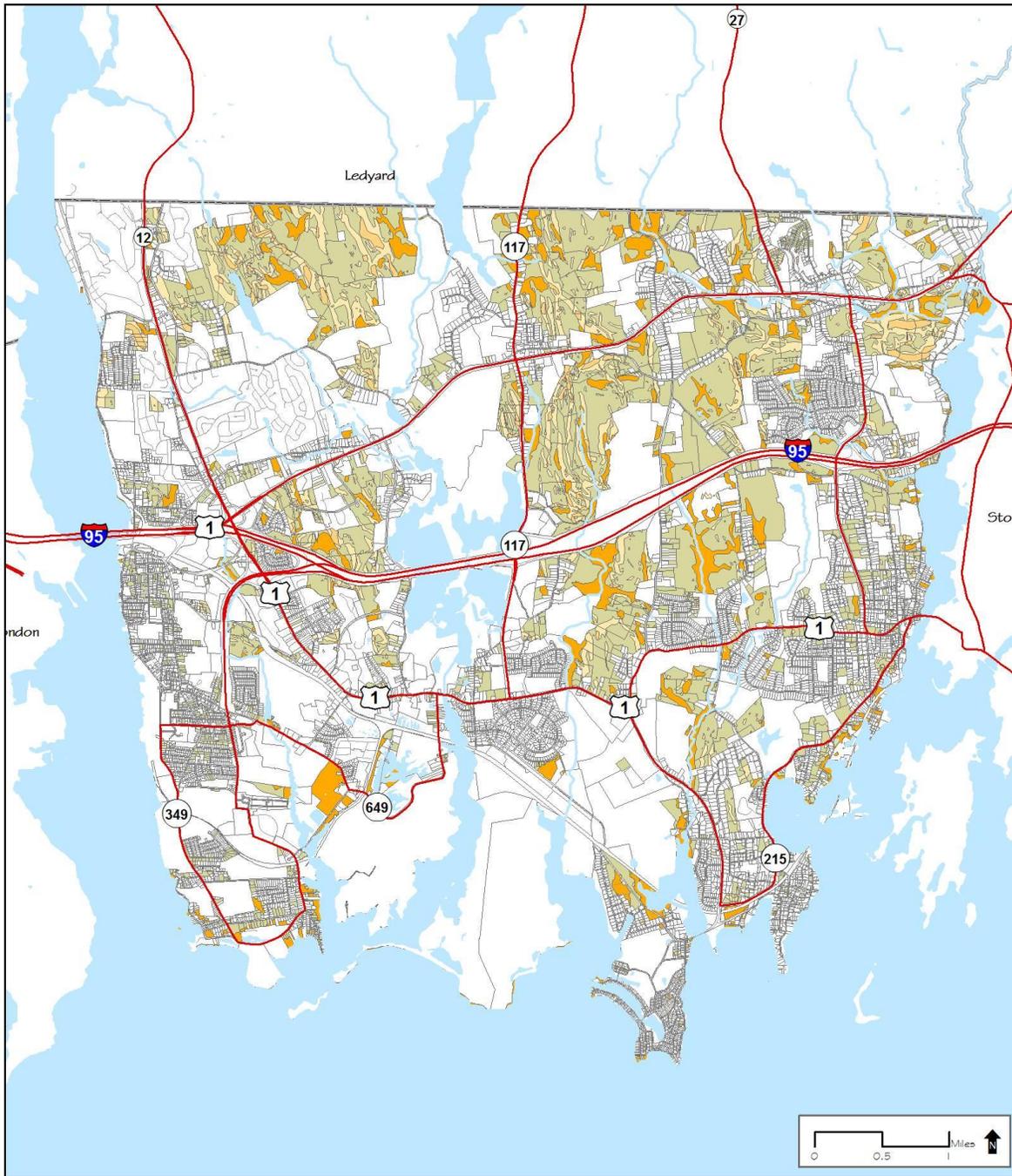
Sources:  
 \* Parcel, Street Centerlines:  
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 \* Basemap Data: OT DEP Map &  
 Geographic Information Center (2012)

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# MAP 6: CONSTRAINTS TO VACANT, UNDERDEVELOPED, or AG LANDS



## Town of Groton

Plan of Conservation & Development Update

Physically Constrained  
Vacant, Underdeveloped,  
or Ag Land

### Contstrained Land

- 100% Deductions: 100 Yr Floodzones, Inland and Tidal Wetlands; Water Courses
- 80% Deductions: Slopes >25%
- 35% Deductions: Slopes 15-24%
- Vacant, Underdeveloped and Agriculture Parcels

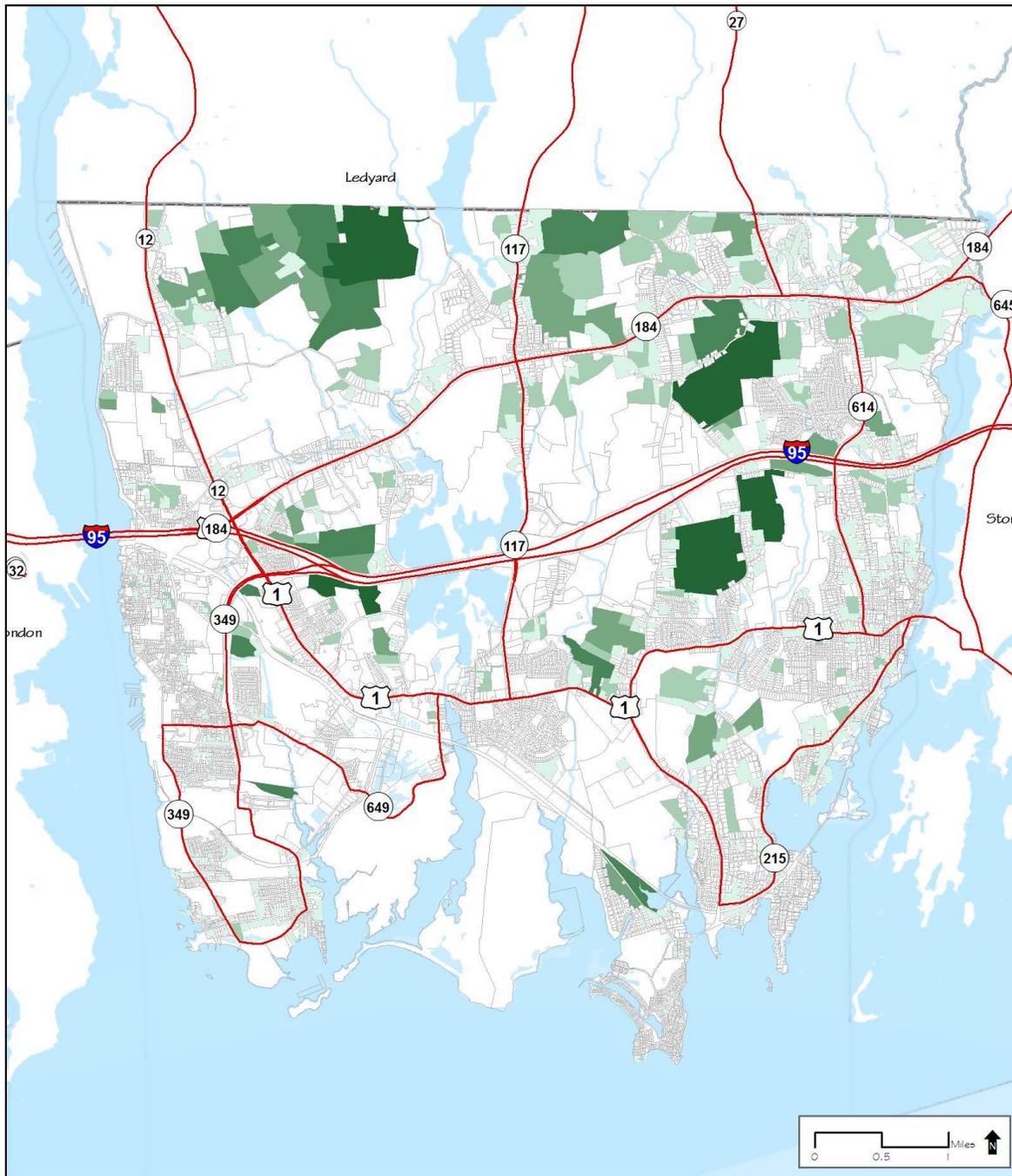
Source:  
\* Parcels, Street Centerlines:  
Town of Groton GIS Dept.  
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as a planning document.  
Delineations may not be exact.

Date: September 2013



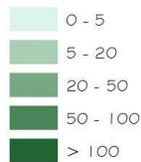
# MAP 7: POTENTIAL DWELLING UNITS



**Town of Groton**  
*Plan of Conservation &  
 Development Update*

Potential New Dwelling Units  
 Under Full Build -Out

### Potential New Dwelling Units



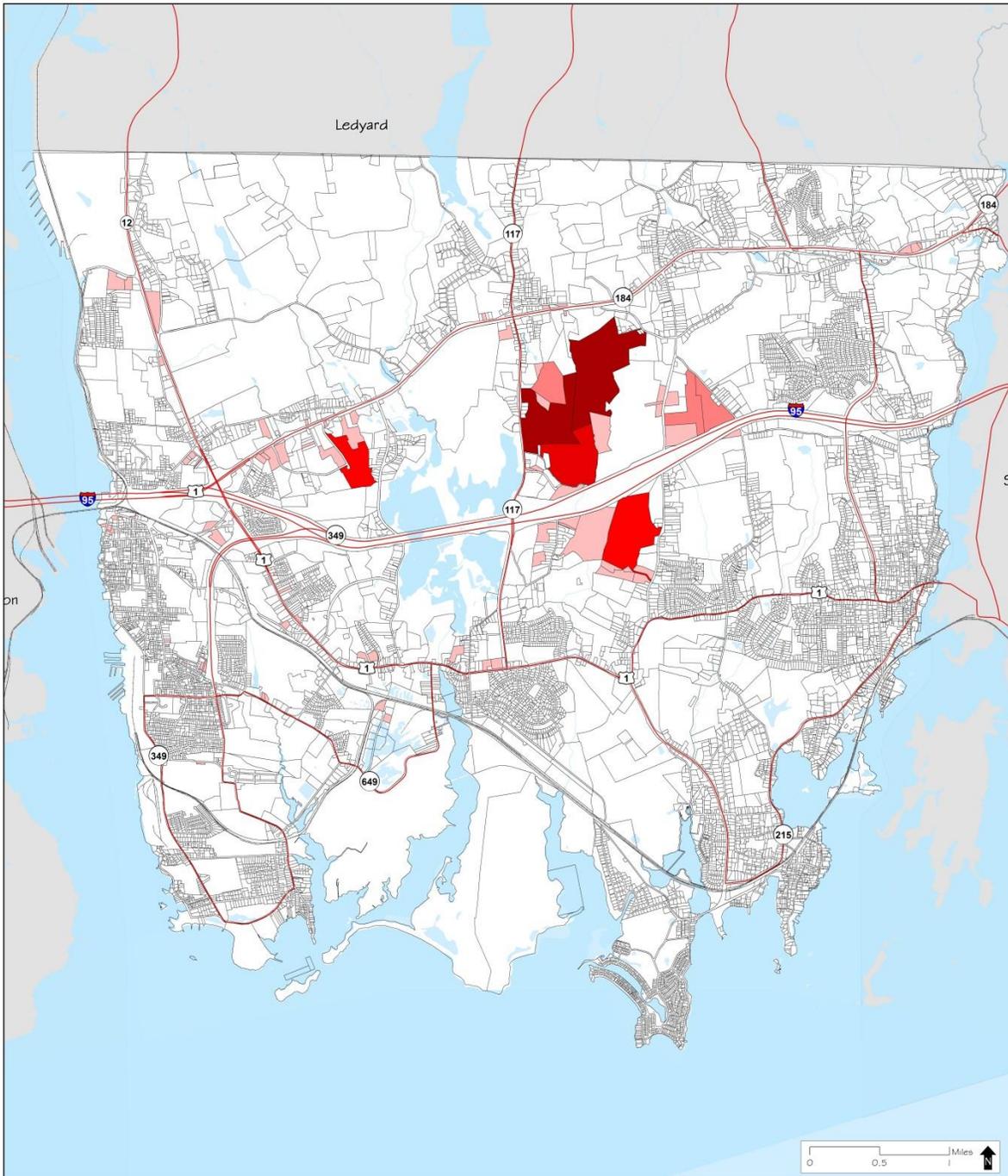
Sources:  
 \* Parcels, Street Centerlines:  
 Town of Groton GIS Dept.  
 \* Basemap Data: CT DEP Map &  
 Geographic Information Center (2012)

This map was developed for use  
 as a planning document.  
 Delineations may not be exact.

Date: November 2013



**MAP 8: POTENTIAL COMMERCIAL AND INDUSTRIAL DEVELOPMENT USING EFFECTIVE FAR**



**Town of Groton**  
*Plan of Conservation &  
 Development Update*

Commercial and Industrial  
 Build Out Map  
 (Effective FAR)

Potential Building Square  
 Footage (1 000 sq ft)



Source:  
 \* Parcel, Street Centerline:  
 Town of Groton Geographic Information Systems Dept.  
 \* Base Map Data: Connecticut Department Of Environmental  
 Protection Map & Geographic Information Center (2011)  
 This map was developed for use as a planning  
 document. Delineations may not be exact.



Date: November 2013