



40 Loeffler Road, Bloomfield, Connecticut 06002 Phone 860.726.2000 Fax 860.380.5120 [www.Duncaster.org](http://www.Duncaster.org)

November 16, 2023

Mr. Alan Budkofsky, Chair  
Inland Wetlands & Watercourses  
Commission  
Town Hall  
800 Bloomfield Avenue  
Bloomfield, CT 06002-0337

Mr. Byron Lester, Acting Chair  
Bloomfield Town Plan & Zoning  
Commission  
Town Hall  
800 Bloomfield Avenue  
Bloomfield, CT 06002-0337

Re: Applications of Duncaster, Inc. for: Inland Wetlands and Watercourses Permit to Conduct Regulated Activities at 20-80 and 90 Loeffler Road; Wetlands Map Amendment regarding 20-80 and 90 Loeffler Road; and Special Permit approval for the construction of a new building addition at 20-80 Loeffler Road and proposed residential dwelling units at 90 Loeffler Road

Dear Chairs Lester and Budkofsky:

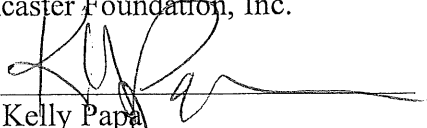
The Duncaster Foundation, Inc. ("Duncaster Foundation") is the current owner of real property located at 90 Loeffler Road (Assessor's Map 30/Lot 164) in Bloomfield, Connecticut ("Subject Property"). Duncaster, Inc. is the current owner of the adjacent parcel, 20-80 Loeffler Road (Assessor's Map 30/Lot 163) in Bloomfield, Connecticut.

The Duncaster Foundation understands that Duncaster, Inc. is filing applications with the Bloomfield Inland Wetlands & Watercourses Commission and the Bloomfield Town Plan & Zoning Commission in connection with the proposed construction of a new building addition at 20-80 Loeffler Road and an elderly congregate 60-unit residential apartment building and 32 cottages at 90 Loeffler Road. Specifically, Duncaster, Inc. is filing applications for Inland Wetlands and Watercourses Permit to conduct regulated activities, Wetlands Map Amendment, and Special Permit approval. The Duncaster Foundation supports these applications and hereby authorizes Duncaster, Inc. and its attorneys at Shipman & Goodwin LLP to pursue all necessary approvals and permits from the Town of Bloomfield for the new building addition at 20-80 Loeffler Road and residential dwelling units at 90 Loeffler Road.

Sincerely,

Duncaster Foundation, Inc.

By:

  
Kelly Papa  
Executive Director  
Duly Authorized

# SHIPMAN

Joseph P. Williams  
Phone: (860) 251-5127  
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One Constitution Plaza  
Hartford, CT 06103

November 17, 2023

Mr. Byron Lester, Acting Chair  
Bloomfield Town Plan & Zoning Commission  
Town Hall  
800 Bloomfield Avenue  
Bloomfield, CT 06002-0337

Re: Application of Duncaster, Inc. for Special Permit approval for the proposed expansion at 20-80 Loeffler Road and proposed residential dwelling units at 90 Loeffler Road, Bloomfield, CT

Dear Chair Lester:

On behalf of our client, Duncaster, Inc., I am pleased to submit to the Bloomfield Town Plan & Zoning Commission an application for Special Permit approval for the proposed construction of a new building addition at 20-80 Loeffler Road (Assessor's Map 30 / Lot 163), and an elderly congregate 61-unit residential apartment building and 32 cottages at 90 Loeffler Road (Assessor's Map 30 / Lot 164) in Bloomfield, Connecticut (together, the "Properties" or "Site").

## The Properties

The Properties are located north of Loeffler Road (a/k/a State Highway 178) and south and west of Mountain Avenue. The total Site is comprised of approximately 71.4 acres in two adjoining parcels: the 20-80 Loeffler Road parcel consisting of approximately 55.3 acres (hereinafter referred to as the "Legacy Campus" parcel) and 90 Loeffler Road consisting of approximately 16.1 acres (hereinafter referred to as the "East Campus" parcel).

The Duncaster, a continuing care community that was originally approved in 1982, is located on the northern portion of the Legacy Campus. Currently, this parcel includes 190 independent living units, 43 assisted living and memory care units, 60 skilled nursing bed units, food service, and congregate facilities. The entire facility is linked by an enclosed corridor system. The remainder of the Legacy Parcel is undeveloped wooded land. The East Campus parcel is currently farmland.

Both of the Properties are zoned Planned Elderly Congregate ("PEC"). In the PEC zone, multi-family residential dwelling units (for single person occupants over age 62 or multiple

occupants where one person is over age 62 and all others over age 50) and uses clearly accessory to the principal residential use, including continuing service and support services, are allowed by special permit.

The Site is not located within five hundred feet of an adjoining municipality and is not located within an aquifer protection area. The Site is located within the North Branch Park River Watershed, and notice will be provided to the Metropolitan District Commission in accordance with Section 9.12.J of the Bloomfield Zoning Regulations ("Regulations"). Traffic to the completed project will not use streets within an adjacent municipality to enter or exit the site, sewer or water drainage from site will not flow through or impact the drainage or sewerage system of an adjoining municipality, and water run-off from the improved site will not impact streets or other municipal or private property within an adjoining municipality.

### **Our Proposal**

Duncaster proposes to re-develop approximately 18.6 acres of its campus with the construction of a new building addition ("The Legacy") as well as a new residential independent living apartment complex and new cottage units with associated infrastructure ("East Campus Expansion"). The Legacy addition, located within the northwest area of the campus on 20-80 Leffler Road, is approximately 12,100 sf and consists of community areas such as a meeting auditorium, fitness center and campus offices. The Legacy will be accessed by the current site driveway from Mountain Avenue.

The East Campus Expansion, to be located on 90 Loeffler Road, consists of a 56,600 square foot, 61-unit independent living apartment complex equipped with fitness area and restaurant for residents and 32 cottage units located to the southeast of the apartment complex. The cottages include six single dwellings, seven duplex-style, and three quadplex-style single-story buildings. Access to the East Campus Expansion will be provided by two new driveways from Mountain Avenue. The East Campus Expansion will also have a network of stone dust trails connecting the two sides of the Duncaster campus through existing wetlands.

We request an amendment to the approved Master Plan in connection with this Special Permit application, in accordance with Section 5.5.H.2.a. of the Regulations, regarding the proposed layout and dimensional characteristics of the PEC. Duncaster proposes to increase the maximum allowable residential density of the Master Plan to 386 overall units and to increase the height of the independent living apartment complex in the East Campus Expansion to 47 feet.

### **Compliance with Zoning Regulations**

**Suitable Location for Use:** The Properties are located in the PEC District, which was established to provide private residential dwelling units restricted to elderly residents, with common facilities and services including common dining and health care facilities. Accordingly, the proposed building expansion and residential units are in harmony with the appropriate and orderly development in this district; this Site offers an optimal location for the proposed residential units and operations. In addition, the proximity of the proposed additions to the on-site assisted living and memory care units, skilled nursing beds and Health Center will be beneficial for the residents. Indeed, the proposed residential units will serve the general welfare and needs of the community by providing additional options for Bloomfield's citizens to continue living in town. It will also be a smaller, lower-maintenance option for persons older than 62.

**Appropriate Improvements:** The proposed building expansion and residential units will be constructed in the contemporary style of the buildings currently on-site. Accordingly, the design elements of the proposed development will be attractive and compatible with the adjacent properties. In addition, the buildings are suitably arranged, and appropriate open space, light and air are provided. The village atmosphere that exists on the Site will be extended to the newly developed areas. The Site will be generously landscaped and sensitively lighted to provide neighboring uses with ample screening and avoid adverse impacts. The landscaping plan our team has designed will enhance site character and provide visual screening to neighboring properties. The proposed planting plan includes extensive vegetation throughout the proposed development. Duncaster intends to retain as much existing trees and natural vegetation as feasible to preserve the character of the property.

The proposed development does not include any signs, lighting or noise-making uses that will be detrimental to the neighboring area. We are confident that the thoughtful design of the proposed development, including the location, nature and height of buildings, walls, fences, planned activities, and the nature and extent of landscaping, will encourage the appropriate development and use of adjacent land and buildings, and not impair their value.

**Suitable Transportation Conditions:** The Legacy will be accessed by the current site driveway from Mountain Avenue. Access to the East Campus Expansion will be provided by two new driveways from Mountain Avenue. The layout of the development provides for orderly pedestrian and vehicular access to and circulation within the Site. The parking areas are adequate in size and suitably screened from adjacent uses.

The Traffic Impact Study prepared by Fuss & O'Neill and submitted herewith concludes that the proposed development will generate a relatively small amount of traffic and the relevant intersections will continue to operate acceptably. The locations of the proposed site driveways provide sufficient sight distance for safe egress of vehicles from the development. Based on the

results of its analysis, Fuss & O'Neill gives its professional opinion that the proposed development will not have a significant impact to traffic operations within the study area.

**Adequate Public Utilities and Services:** The development will be serviced by public sewer and water. All necessary utilities are available along the Properties' frontages along Loeffler Road or Mountain Avenue and have adequate capacity. Moreover, the Site has been designed to allow for easy accessibility and circulation for fire apparatus and other emergency services.

**Environmental Protection and Conservation:** Our plan respects the considerable natural beauty of the Site and avoids adverse impacts to wetlands and watercourses. We propose to enhance the walking trails on the property to promote appreciation of the natural resources and minimize vehicle trips by connecting the two sides of the campus. In addition, the overall drainage patterns of the Site will be unchanged by the project. Fuss & O'Neill has designed subsurface stormwater detention systems for both Properties. The majority of the East Campus Expansion site will be collected and conveyed to at-grade stormwater ponds to attenuate peak flows. The stormwater ponds also provide alternative habitat for native wetland plants and species as well as a natural walking experience for Duncaster residents. Fuss & O'Neill's hydrologic evaluation demonstrates a net decrease in peak stormwater discharge from the Site.

**Long-Term Viability:** Adequate provision has been made for the sustained maintenance of the proposed development. All proposed structures and improvements are designed using industry best practices and incorporate high quality materials. Schedules for exterior maintenance will be created for items such as landscaping, power washing, painting and repairs to ensure the property is well-maintained and visually appealing.

**Plan of Conservation and Development ("POCD"):** The POCD recognizes that there has been a large increase in retirement age residents in Bloomfield. The projected trend is that Bloomfield's population will continue to age and the largest growth segment will be people ages 65 and older. (POCD p. 4.) With people living longer and healthier lives, the older age group will continue to grow. The "baby boom" (people born between 1946 and 1964) will enter these older age groups during the next 20 years. (POCD p. 76.) Indeed, the population composition of the 65+ age group is projected to increase to 23% in 2030. (POCD p. 4.) Also, by the year 2030, adults aged 55 and over will comprise up to 33 percent of the total population of Bloomfield, up from only 20 percent in 1970. (POCD p. 76.) More residents that are elderly will constrain the number of housing units that are in the market and increase the demand for workers. A reduction in supply and an increase in demand will further stress housing affordability. (POCD p. 76.) In addition, as elderly residents become less independent, the need and types of assistance increases. (POCD p. 76.)

Our proposed plan is in harmony with the purposes of the Regulations and helps achieve several goals, objectives, policies and recommendations of the POCD, including: anticipating senior housing needs (POCD p. 77); expanding housing opportunities and design choices to

Mr. Byron Lester, Acting Chair  
November 17, 2023  
Page 5

accommodate a variety of household types and needs (POCD p. 113); continuing to provide for a diverse community (POCD p. 77); and providing economic development through the creation of tax revenue, jobs and places that sell goods provide services (POCD p. 58).

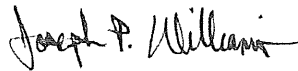
### **Conclusion**

The proposed development will promote the general welfare and serve the needs of the community by providing additional options for Bloomfield residents to stay in town. It will also be a smaller, lower-maintenance option for persons older than 62.

We appreciate the opportunity to bring this exciting proposal before you, and we look forward to discussing it with you in the earliest possible public hearing. If you or your staff should need anything else from us, please do not hesitate to contact me.

Thank you for your time and consideration.

Very truly yours,

A handwritten signature in black ink, appearing to read "Joseph P. Williams". The signature is fluid and cursive, with the first name "Joseph" and last name "Williams" clearly distinguishable.

Joseph P. Williams