



TOWN OF LEDYARD CONNECTICUT

741 Colonel Ledyard Highway
Ledyard, CT 06339-1511

Ad Hoc Committee to Evaluate Separation of the Planning Commission & Zoning Commission ~ AGENDA ~

SPECIAL MEETING

Tuesday, July 14, 2026

6:00 PM

Town Hall Annex-Hybrid Format

REMOTE MEETING INFORMATION

Join Zoom Meeting

<https://ledyardct.zoom.us/j/85034493437?pwd=V2qWFruflPp9fVIVGdljPMMUQMbVlh.1>

Meeting ID: 850 3449 3437

Passcode: 938277

One tap mobile

+13052241968,,85034493437#,,,,*938277# US

I. CALL TO ORDER

II. ROLL CALL

III. APPROVAL OF MINUTES

1. MOTION to approve the Ad Hoc Committee to Evaluate the Separation of the Planning Commission & Zoning Commission organizational meeting minutes of June 23, 2026.

Attachments: [Ad Hoc Minutes 06.23.2026](#)

IV. BUSINESS OF THE MEETING

1. Review and Discuss Town Resolution 002-2026/Mar 25.

Attachments: [Resolution Establishing an Ad Hoc Committee to Evaluate the Separation of the Planning Commission and Zoning Commission](#)

2. Review and discuss Town Charter IV Section 3.

Attachments: [Chapter IV Section 3 Town Charter](#)

3. Discuss Pros & Cons of a Separate Planning & Zoning Commission vs. a Combined Planning & Zoning Commission.

Attachments: [Letter 7-7-26 Proposed Topics - Schroeder](#)
[7-8-26 Executive Summary of Treaster 12-25 Letter](#)
[Reasons to Reestablish Separate Zoning and Planning - Treaster](#)
[Useful Links](#)

V. ADJOURNMENT

DISCLAIMER: Although we try to be timely and accurate these are not official records of the Town.



TOWN OF LEDYARD

741 Colonel Ledyard
Highway
Ledyard, CT 06339-1511

File #: 26-1005

Agenda Date: 7/14/2026

Agenda #: 1.

AGENDA REQUEST
GENERAL DISCUSSION ITEM

Subject:

MOTION to approve the Ad Hoc Committee to Evaluate the Separation of the Planning Commission & Zoning Commission organizational meeting minutes of June 23, 2026.

Background:

(type text here)

Department Comment/Recommendation:

(type text here)



TOWN OF LEDYARD

Ad Hoc Committee to Evaluate Separation of the Planning Commission & Zoning Commission

741 Colonel Ledyard Highway
Ledyard, CT 06339-1511

Meeting Minutes Organizational Meeting

Tuesday, June 23, 2026

5:30 PM

Council Chambers Town Annex

I. CALL TO ORDER

Town Council Chairman Gary St. Vil called the meeting to order at 5:33 p.m. in the Town Hall Annex Council Chambers and on Zoom.

II. ROLL CALL

Present Board Member Tony Capon
Board Member Kevin Dombrowski
Board Member M. Dave Schroeder Jr.
Board Member Beth E. Ribe
Carmen Garcia-Irizarry

III. BUSINESS OF MEETING

1. Election of Officers.

Motion to Nominate Commissioner Carmen Garcia-Irizarry as Chairman of the Ad Hoc Committee to Evaluate Separation of the Planning Commission and Zoning Commission.
This was Approved and so declared.

RESULT: APPROVED AND SO DECLARED

MOVER: M. Dave Schroeder, Jr.

SECONDER: Kevin Dombrowski

MOTION to nominate Commissioner Tony Capon as Vice Chairman of the Ad Hoc Committee to Evaluate Separation of the Planning Commission & Zoning Commission.

This was Approved and so declared.

RESULT: APPROVED AND SO DECLARED

MOVER: M. Dave Schroeder, Jr.

SECONDER: Kevin Dombrowski

2. MOTION to set the 2026 Ad Hoc Committee to Evaluate Separation of Planning Commission & Zoning Commission schedule as follows: July 14, 2026 -August 11, 2026 - September 8, 2026 -October 13, 2026- November 10, 2026- December 8, 2026.

Mr. Schroeder Jr. asked if the committee is allowed to discuss things that are not specifically addressed in the resolution. Mr. Dombrowski stated as long as the information is factual and pertains to the topic of evaluating the separation of the planning commission and zoning commission it can be discussed by the committee. Mr. Capon added that it would be at the discretion of the chairperson.

The committee agreed that any articles or talking points should be sent to the chairperson and then forwarded to the administrative support person for the committee, Jessica Michaud, to both be added to the agenda and distributed to the committee. This allows for the committee to review the documents prior to the meeting and be prepared to discuss the information at the meeting.

The committee briefly discussed the rules of electronic communications.

Ms. Michaud stated that the first meeting on July 14th, 2026 would be considered a special meeting as there is not enough time to provide the public 30 days notice.

MOVER: Kevin Dombrowski

SECONDER: Beth E. Ribe

3. Review the Resolution Establishing an Ad Hoc Committee to Evaluate the separation of the Planning Commission and the Zoning Commission.

Chairperson Garcia-Irizarry briefly reviewed the Resolution Establishing an Ad Hoc Committee to Evaluate the Separation of the Planning Commission & Zoning Commission.

Chairperson Garcia-Irizarry reminded the committee that the committee has been established for six months, if they need more than six month the committee would need to go back to the Town Council to request additional time.

The committee discussed that as part of the resolution the Mayor was to appoint a staff member from the Planning & Zoning Department. Mr. Capon and Chairperson Garcia-Irizarry agreed that it would be most beneficial to the committee to have the director of planning present at the meetings. Mrs. Michaud stated that she would ask the Mayor about appointing the director of planning to the committee.

Mr. Schroeder Jr. asked for clarification regarding the section in the resolution that states "reduce the potential for conflicts of interest". Mr. Dombrowski stated that the committee hasn't identified a conflict of interest at this time but if at some point during their discussions they do discover one it could be discussed then.

Ms. Ribe asked how the committee would break up the information gathering and what the structure of the meetings going forward would be. Mr. Capon asked if the committee would be having public presentation or would they review the information as a committee come to a conclusion and then present it to the public allowing for public comment at that time. Mr. Dombrowski stated he thinks it would be best to accept written comment to the citizens initially,

if at a later time it is determined a public hearing is needed it can be scheduled. Chairperson Garcia-Irizarry agreed that it would be best to not allow public comment at the meetings at this time.

IV. COMMENTS OF COMMITTEE MEMBERS

The committee discussed the experience and expertise each member brings to the meetings. Members also reviewed the committee's role and responsibilities, including its purpose to examine the separation of the planning and zoning commission vs. a combined planning and zoning commission and provide an informed opinion and recommendation to the Town Council.

V. ADJOURNMENT

Meeting was adjourned by Chairperson Carmen Garcia-Irizarry at 6:12 p.m.

DISCLAIMER: Although we try to be timely and accurate these are not official records of the Town.



TOWN OF LEDYARD

741 Colonel Ledyard
Highway
Ledyard, CT 06339-1511

File #: 26-1000

Agenda Date: 7/14/2026

Agenda #: 1.

AGENDA REQUEST
GENERAL DISCUSSION ITEM

Subject:

Review and Discuss Town Resolution 002-2026/Mar 25.

Background:

(type text here)

Department Comment/Recommendation:

(type text here)

RESOLUTION
ESTABLISHING AN AD HOC COMMITTEE
TO EVALUATE THE SEPARATION OF THE
PLANNING COMMISSION & ZONING COMMISSION

WHEREAS: the Town of Ledyard currently operates under a Combined Planning and Zoning Commission pursuant to Connecticut General Statutes § 8-4a; and in accordance with Ordinance #300-005 "An Ordinance Providing For A Combined Planning And Zoning Commission for the Town of Ledyard"; and Chapter IV, Section 3, of the Town Charter;

WHEREAS: residents have expressed concern that the combined Planning and Zoning Commission has faced an increase in the volume of applications and the complexity of land-use issues; and therefore, has requested the establishment of an Ad Hoc Committee to evaluate separating the roles into a Planning Commission; and into a Zoning Commission;

NOW, THEREFORE, BE IT RESOLVED: that there is hereby established "*An Ad Hoc Committee to Evaluate the Separation of the Planning Commission & Zoning Commission*" to be composed of five (5) members appointed by the Ledyard Town Council.

Those members shall, as much as possible, be representative as follows:

- One Members of the Community-at-Large with Planning experience
- One members of the Community-at-Large with Zoning experience
- One member from the Planning and Zoning Commission
- One member from the Community-at-Large
- One member from the Town Council

In addition, request the Mayor assign a member from the Land Use Department Staff, either the Zoning Enforcement Officer; or Director of Planning to support the Ad Hoc Committee.

The Committee shall hold its Organizational Meeting no later than 30 days after its appointment and shall elect a Chairman, and Recording Secretary.

BE IT FURTHER RESOLVED, that Committee Members shall serve for a six (6) month term. Any vacancies on said committee shall be filled by the appointment of the Ledyard Town Council with priority given to maintaining as much as possible the structure above; and the attendance of fifty percent of the appointed members shall constitute a quorum.

BE IT FURTHER RESOLVED, that said Ad Hoc Committee is authorized:

- Study the feasibility, benefits, and costs of separating the Planning and Zoning Commission into two separate entities.
- Evaluate whether separating the roles would increase efficiency; improve public transparency, and reduce the potential for conflicts of interest; by the Planning Commission focusing on long-term development/master plan; and a Zoning Commission focusing on site plans and regulations;
- Review, among other things: staffing impacts, budgetary implications, changes to local ordinances required, and potential improvements to the permitting timeline.

BE IT FURTHER RESOLVED, that said Ad Hoc Committee shall provide a report of their recommendations to the Town Council upon completion of their assignment, no later than six months from its Organizational Meeting.

Adopted by the Ledyard Town Council on: March 25, 2026


Gary St. Vil Chairman

AN ORDINANCE
PROVIDING FOR A COMBINED PLANNING AND ZONING COMMISSION
FOR THE TOWN OF LEDYARD

Be it ordained by the Town Council of the Town of Ledyard

Section 1. Authority

Pursuant to Chapter IV, Section 3, of the Town Charter, the duties of the Zoning Commission of the Town of Ledyard as set forth in Chapter 124 of the General Statutes; shall be discharged by the Planning and Zoning Commission of the Town of Ledyard.

Section 2. Purpose

The purpose of the Planning and Zoning Commission is to discharge the duties specified in Chapters 124 and 126 of the General Statutes.

Section 3. Organization/Membership

The Planning and Zoning Commission of the Town of Ledyard shall be served by members as provided for in Chapter IV, Section 3, of the Town Charter, consisting of five (5) regular members and three (3) Alternate who shall be electors of the Town of Ledyard and shall hold no salaried municipal office. Members shall commence to serve their terms immediately upon appointment and shall serve until their successor has qualified or they have been reappointed or removed by the Town Council.

Regular Members and Alternate Members of the Planning and Zoning Commission shall not be members or alternate members of the Zoning Board of Appeals.

Appointment and removal of any member of the Planning and Zoning Commission shall be as provided for in Chapter IV, Section 9, of the Town Charter.

Any member of the Commission who is absent from three (3) consecutive regular meetings and any intervening duly called special meetings shall be considered to have resigned from the Commission. The vacancy shall be filled as herein before provided. Additionally, the commission may vote to waive the requirements of this section in each case where illness or other extenuating circumstances make it impossible for a member to meet the attendance requirements of this action.

The Town Council may remove members for cause which includes, but is not limited to unexcused absence from three (3) consecutive regular meetings and any intervening duly called special meeting, failure to act in the best interests of the Commission. It shall be the responsibility of the Chairman of the Commission to notify the Town Council when a member has not properly performed his/her duties.

The Commission may vote to waive the requirements of this section in each case where illness or other extenuating circumstances make it impossible for a member to meet the attendance requirements of this section.

Section 4. Alternate Members

Such alternate members shall, when seated as herein provided, have all the powers and duties set forth in the General Statutes or any special act relating to such municipality for such Commission and its members.

An Ordinance Providing for a Combined Planning and Zoning Commission for the Town of Ledyard

If a regular member of said Commission is absent or disqualified, the Chairman of the Commission shall designate an alternate to so act, choosing alternates in rotation so that they shall act as nearly equal a number of times as possible.

If any alternate member is not available in accordance with such rotation, such fact shall be recorded in the minutes of the meeting.

Section 5. Duties

The Planning and Zoning Commission of the Town of Ledyard shall have the duties as specified in Chapter IV, Sections 3 of the Town Charter and all duties heretofore assigned by ordinance.

The Zoning Regulations of the Town of Ledyard as adopted and made effective October 11, 1963 and as thereafter amended shall remain in full force and effect except as they may be further amended by the Planning and Zoning Commission of the Town of Ledyard by procedures established in the General Statutes.

The Subdivision Regulations of the Town of Ledyard as adopted on March 22, 1962 and as thereafter amended shall remain in full force and effect except as they may be further amended by the Planning and Zoning Commission of the Town of Ledyard by procedures established in the General Statutes.

Section 6. Severability

If any section, or part of a section, of this Ordinance shall be held by a court of competent jurisdiction to be invalid, such holding shall not be deemed to invalidate the remaining provisions hereof.

Section 7. Effective Date

In accordance with the Town Charter this ordinance shall become effective on the twenty-first (21st) day after such publication following its final passage.

Amended, Adopted and Renumbered by the Ledyard Town Council on: September 25, 2019

Linda C. Davis
Linda C. Davis, Chairman

Approve/Disapprove on: 9/26/19

Fred B. Allyn, III
Fred B. Allyn, III, Mayor

Published on: October 2, 2019

Effective Date: October 23, 2019

Patricia A. Riley
Patricia A. Riley, Town Clerk

Revisions: Ordinance 5, "An Ordinance separating the combined Planning Commission of the Town of Ledyard into a separate Planning Commission of the Town of Ledyard and a separate Zoning Commission of the Town of Ledyard", adopted on October 23, 1961 and as amended and adopted on September 13, 1972; Ordinance #10 "Ordinance Providing for the Appointment of Three Alternate Members to the Planning Commission for the Town of Ledyard" adopted on September 13, 1972; Ordinance 21, "An Ordinance establishing a separate Zoning Commission and Panel of Alternates", adopted on December 5, 1973, Ordinance #128 "An Ordinance Combining the Zoning Commission for the Town of Ledyard with the Planning Commission of the Town of Ledyard" adopted on June 27, 2012

An Ordinance Providing for a Combined Planning and Zoning Commission for the Town of Ledyard

History:

The Twenty-fourth Town Council (2017- 2019) Ordinance Update Initiative: Renumbered Ordinance #128 to Ordinance #300-005.

2012: Ordinance #128 *"An Ordinance Combining the Zoning Commission for the Town of Ledyard with the Planning Commission of the Town of Ledyard"* (Adopted June 27, 2012).

2019: Section 1 removed language pertaining to the implementation; Section 2 removed "Whereas" language as that was in the format of a resolution; updated language to "Land Use Director" and all language regarding purpose for combining the Planning Commission with the Zoning Commission; Section 3 added language regarding member attendance relative to being considered resigned; Section 5 removed Implementation Schedule for Combined Planning and Zoning Commission; Section 7 updated "Severability" and Section 8 "Effective Date" language to be consistent with town ordinances. Removed Section 6 "Repeal" - Per Town Attorney the "Revisions" and "History" paragraph indicates that the previous ordinance has been updated and replaced. Renumbered the Sections accordingly.



TOWN OF LEDYARD

741 Colonel Ledyard
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Ledyard, CT 06339-1511

File #: 26-1001

Agenda Date: 7/14/2026

Agenda #: 2.

AGENDA REQUEST
GENERAL DISCUSSION ITEM

Subject:

Review and discuss Town Charter IV Section 3.

Background:

(type text here)

Department Comment/Recommendation:

(type text here)

CHAPTER IV

OFFICERS, BOARDS; AND COMMISSIONS APPOINTED BY THE TOWN COUNCIL

SECTION 1. TOWN TREASURER

The Town Council shall by resolution no later than one (1) month after its organizational meeting appoint a Treasurer to serve for a two-year term, from the first Monday of January of the even numbered years or until his successor is qualified. The Town Treasurer shall have all powers and duties conferred or imposed by law, shall be the agent of the Town deposit fund, and shall have such other powers and duties prescribed by the Town Council and provided by this Charter.

If a vacancy occurs in said office, from whatever cause arising, it shall be filled by appointment by the Town Council for the unexpired portion of the term of said office.

The Treasurer shall receive such compensation and shall have such assistants as the Town Council may determine. The Treasurer shall designate, subject to the approval of the Town Council, a Deputy Treasurer who, in the absence or inability of the Treasurer to act, may assume the duties of the Treasurer as assigned by the Town Council.

SECTION 2. FIRE MARSHAL

The Town Council shall appoint a fire marshal and deputy fire marshal(s) as may be necessary, who shall have all the powers and duties of a fire marshal or deputy fire marshal as provided in the General Statutes. The Fire Marshal and Deputy Fire Marshal(s) shall be certified in accordance with the General Statutes.

SECTION 3. PLANNING & ZONING COMMISSION

There shall be a Planning & Zoning Commission consisting of five (5) members and three (3) alternates.

The Town Council shall fill vacancies on the Planning & Zoning Commission from whatever cause arising, in the manner, for the terms, and with all the powers and duties, not inconsistent with this Charter, as prescribed in the General Statutes.

The Planning & Zoning Commission shall advise the Mayor, regarding the appointment and removal of a Zoning Official, who shall be charged with the implementation and enforcement of the policies and regulations of the Planning & Zoning Commission.



TOWN OF LEDYARD

741 Colonel Ledyard
Highway
Ledyard, CT 06339-1511

File #: 26-1002

Agenda Date: 7/14/2026

Agenda #: 3.

AGENDA REQUEST
GENERAL DISCUSSION ITEM

Subject:

Discuss Pros & Cons of a Separate Planning & Zoning Commission vs. a Combined Planning & Zoning Commission.

Background:

(type text here)

Department Comment/Recommendation:

(type text here)

Ad Hoc Committee to Evaluate the Separation of the Planning and Zoning Commission

Proposed Topics for Discussion and Research

Dear Fellow Committee Members and Members of the Public,

As we begin our work, I have been thinking about the scope of the Town Council's charge and what questions we should be asking over the next six months.

In my view, our assignment is not simply to decide whether two commissions would be preferable to one. Rather, we have been asked to determine whether a different Planning and Zoning structure would better serve the Town of Ledyard.

To answer that question, I believe we first need to understand how the current combined Planning and Zoning Commission has performed over the past fourteen years. That evaluation should be based on objective criteria derived from Connecticut statutes, the Town Council's resolution establishing this Committee, and the statutory roles and responsibilities assigned to Planning and Zoning Commissions.

I appreciate the comments made at our organizational meeting about focusing on the future rather than revisiting the past. However, I believe we cannot effectively evaluate the future without first understanding the past. I am not suggesting that we revisit past policy decisions or assign blame to individuals. Rather, I believe we should objectively examine examples from the historical record—not to debate whether a particular decision was "right" or "wrong," but to understand whether the Town's institutional structure influenced how those decisions were developed, debated, and implemented.

With that goal in mind, I would like to suggest several areas that may warrant discussion and research.

1. Long-Range Planning

One of the recurring themes in both the Town Council's resolution and public comments has been whether the combined Commission has become so occupied with zoning and development review that long-range planning receives less attention.

Possible questions include:

- Has the combined Commission adequately fulfilled the statutory planning responsibilities identified by the UCONN Land Use Academy?
 - How often does the Commission discuss the POCD?
 - How often has it initiated planning studies, infrastructure planning, or implementation projects?

- Does the current structure provide sufficient opportunity for deliberation on long-term planning issues?
- Does the Commission have time to adequately perform both planning and zoning functions sufficiently?
- Would separate commissions provide greater capacity for long-range planning?

2. Implementation of the POCD

Ledyard has now tried both separate and combined Commissions. Which of the two was more successful at adopting Town planning policies consistently by implementing corresponding zoning regulations.

Possible questions include:

- Have the major planning policies identified in successive POCDs been consistently translated into zoning regulations or other implementation measures?
- Does the institutional structure of the combined Commission affect the Town's ability to implement its own stated policies?
- Are certain categories of POCD policies implemented into regulations more consistently than others?
- Would a separate Planning Commission be better positioned to monitor regulatory implementation (of the POCD) and recommend updates?

3. Independent Review and Institutional Checks

The UCONN LUA fact sheets note that, when Planning and Zoning Commissions are separate, the Planning Commission¹ must review proposed zoning amendments and report on their consistency with the POCD, whereas the Zoning Commission² must establish, change or repeal regulations in consideration of (per CGS 8-2(b)1)³ the POCD. If the Planning Commission recommends against a proposal, the Zoning Commission may still adopt it, but only by a two-thirds vote. This creates an independent review focused on long-range planning.

When the commissions are combined, that independent review no longer occurs because the same body prepares the POCD, interprets the POCD, drafts zoning regulations, and determines whether those regulations are consistent with the POCD.

Questions the Committee may wish to consider include:

- Did the elimination of independent Planning Commission review materially affect how zoning regulations or the POCD were developed, debated, or adopted?
- Was there less discussion of consistency with the POCD?
- Was there less opportunity for independent review and public input?

¹ https://clear.media.uconn.edu/wp-content/uploads/sites/163/2023/10/planningfactsheet.page_.pdf

² https://clear.media.uconn.edu/wp-content/uploads/sites/163/2023/10/luafactsheetszoning.page_.pdf

³ https://www.cga.ct.gov/current/pub/chap_124.htm#sec_8-2

- Was the POCD driving regulatory change, or was the POCD being revised to accommodate regulatory objectives that had already been established?
- Would separate commissions provide a more robust process or additional capacity for reviewing planning policy and zoning amendments?

4. Regulatory Development and Legislative Drafting

The Town undertook comprehensive zoning regulation rewrites in approximately 2010–2012 and again between 2015 and 2020. The second rewrite required additional revisions following procedural and substantive issues.

Rather than debating the merits of those regulations, the Committee may wish to examine the process by which they were developed.

Possible questions include:

- Did the Town's regulatory objectives change between the two comprehensive rewrites?
- If so, did the change in Commission structure play a role?
- What other factors contributed to those changes or influenced the outcome? (e.g. membership, staffing, state legislation, economic conditions, or development pressures)
- Does the Commission's institutional structure affect the town's long-term planning objectives?

5. Regulatory Quality, Litigation, and Budgetary Implications

The Town Council specifically directed this Committee to consider staffing, budgetary implications, and potential conflicts.

Although litigation can occur under any governance structure, legal challenges may also provide insight into the quality and clarity of land use regulations.

Possible questions include:

- Has the combined Commission structure affected the clarity and legal defensibility of the Town's regulations?
- Have new regulations clearly expressed legislative intent?
- Have regulatory ambiguities resulted in appeals or litigation?
- Has the Town incorporated lessons learned from previous litigation?
- How has the combined Commission structure affected the decision making process when faced with potential litigation?
- Would separating planning and zoning improve either the regulatory drafting process or affect the decision making process with regards to litigation?
- Does the Commission adequately consider long-range municipal planning and intermunicipal coordination when making decisions?

6. Decision-Making Process and Public Transparency

The Committee may wish to examine the deliberative process surrounding major zoning amendments, including the extent to which planning objectives, alternatives, and consistency with the POCD were developed and discussed prior to adoption.

Possible questions include:

- What information is routinely considered when major zoning changes are proposed?
- How consistently is consistency with the POCD discussed during major zoning amendments?
- How are competing statutory objectives under CGS §8-2 balanced when adopting zoning regulations?
- What weight is given to staff recommendations, legal advice, economic analyses, advisory commissions, public input, and outside experts?
- Can the rationale for major policy decisions clearly be traced in the public record?
- Are alternative approaches publicly considered before major policy or zoning changes are adopted?
- Would separate Planning and Zoning Commissions improve transparency by providing dedicated forums for planning policy and zoning policy before changes are adopted?

Finally, I would appreciate clarification regarding one aspect of the Town Council's resolution. The resolution directs this Committee to evaluate the potential for "conflicts of interest." Because that phrase has both legal and ethical meanings, it would be helpful to understand whether the Council intended us to examine only legal or ethical conflicts, or whether it intended the term more broadly to include any conflicts—for example, tensions that arise due to unpopular regulations or unpopular town policies.

These suggestions are intended only as possible discussion topics. I welcome comments, additional ideas, or alternative approaches from fellow Committee members and members of the public. Given our limited six-month timeline, I believe it would be helpful to identify our major research topics early so that we can gather information, review historical records, and have meaningful discussions before preparing our final report.

Respectfully,

Dave Schroeder Jr.
Ad Hoc Committee Member

Executive Summary of Eric Treaster's December 10, 2025 Letter

Dear Ad Hoc Committee members, members of the public,

Mr. Treaster's December 10, 2025 letter to the Town Council presents a number of observations based upon his experience serving on Ledyard's Zoning Commission between 1985 and 2012, including as Chairman immediately prior to the merger of the Planning and Zoning Commissions.

He raises several points that, when framed as questions about institutional structure rather than policy outcomes, appear to fall within the Town Council's charge to evaluate whether separate Planning and Zoning Commissions would better serve the Town. Namely, the Committee may wish to consider the following questions:

- **Commission workload:** Has the combined Commission had sufficient time and capacity to adequately perform both its planning and zoning responsibilities?
- **Institutional balance:** Has the combined Commission become more focused on development review than on long-range planning?
- **Regulatory development:** Did the merger of the commissions materially affect the way zoning regulations were developed, debated, and maintained?
- **Regulatory quality:** Has the Commission structure affected the clarity, consistency, or legal defensibility of the Town's zoning regulations?
- **Reliance on staff and consultants:** Has combining the commissions increased reliance on professional staff or outside consultants for legislative drafting or policy development?
- **Institutional checks:** Does a combined Commission provide the same level of independent review during the development of planning policy and zoning regulations as existed under separate commissions?

Many of these questions overlap with the broader discussion topics outlined in my July 7, 2026 **Proposed Topics for Discussion and Research** memorandum to the Committee.

That said, Mr. Treaster's letter may provide valuable historical context and specific examples for the Committee to examine. Rather than treating the letter as presenting conclusions, I suggest we view it as identifying hypotheses that can be objectively evaluated through the public record and our research over the coming months.

Sincerely,

Dave Schroeder Jr

Member, Ad Hoc Committee

Reasons to Reestablish Separate Zoning and Planning Commissions

Eric Treaster
10 December 2025

I am here this evening to suggest reasons why the planning and zoning commission should be restored as separate commissions.

I served on the Ledyard Zoning Commission from 1985 to the end of 2012, when the Town Council combined the Zoning and Planning Commissions into a single commission. I was its Chairman in 2011 and 2012.

Ledyard adopted its first set of zoning regulations in 1963. The Town Council served as a combined Planning and Zoning Commission until about 1971, when it split the Commission into a separate Planning and Zoning Commission. At the end of 2012, to encourage commercial development, the Council recombined the Commissions into the current Planning and Zoning Commission.

The zoning regulations originally consisted of 29 pages. Between 1985 and 2011, the regulations underwent a series of revisions, including adopting regulations in about 1998, as suggested by Susan Mendenhall, the Mayor, for age-restricted mobile manufactured home land lease communities.

They also contained regulations suggested by Bill Haase and Brian Palaia, who were Town Planners, that designated areas of Gales Ferry and Ledyard Center as "Village Districts" and "Design Districts" as allowed under the land use statutes.

The Village District regulations included architectural standards, design requirements, and formal reviews by an architectural review board for commercial developments. By mid-2011, the regulations had grown to 206 pages.

In 2012, the Zoning Commission condensed the regulations to 139 pages, including regulations for the Village and Design Districts. They retained the regulations for age-restricted affordable mobile-manufactured home land-lease communities, which, in the early 2000s, guided the development of Stonegate Village on Flintlock Road. Stonegate Village is now Ledyard's 17th-largest taxpayer.

The regulations continued to require special permits for most commercial developments, which were necessary to ensure quality development and to avoid risking the preservation of our Town's character. The last vote of the Zoning Commission, before it permanently adjourned on October 11, 2012, was to approve the condensed set of regulations.

The zoning regulations that were in effect between about 1998 and the end of 2012, about 14 years, have a history of success. They guided the development of the Stonecroft Country Inn on Pumpkin Hill Road, the Pumpkin Hill Convenience Store near the Highlands, and the Two Trees Inn Hotel on Lantern Hill just east of the reservation.

Later versions resulted in the development of the Village Market in Ledyard Center, Dime Bank, the Fire Station, the condominiums on Fairway Drive, CVS in Gales Ferry, and the brick building on the SW corner of 117 and Rt 214, which at the time was owned by SNET. Each of these developments required a special permit.

They were all quality developments that did not affect the preservation of our Town's rural character or harm property values.

After being combined in late 2012, the Planning and Zoning Commission relaxed the regulations to encourage more commercial development. It deleted many special permit requirements, replaced the village and design districts with development districts, deleted the design guidelines, deleted the Architectural Review Board, increased height limits, and deleted regulations for affordable age-restricted land-lease communities.

Later, in about 2020, it removed most of the remaining special permit requirements and, to improve economies of scale and to make the development of multifamily and mixed-use developments more profitable, increased the height limit to 65' for multifamily and mixed-use developments in Gales Ferry and Ledyard Center.

The zoning regulations now consist of 191 pages. They allow most commercial uses as-of-right, including multi-hundred-unit multifamily and mixed-use developments in the Gales Ferry Development District and the Ledyard Center Development District, if the setback and height limits are satisfied and the development conforms with building and health codes. For example, the current regulations would allow, as-of-right, the 308-unit four- and five-story Trident Square Apartment Complex, which is behind the Chinese Restaurant on Rt 12 in Groton, to be built in Gales Ferry and Ledyard Center.

There were fewer high-quality commercial developments during the 14 years after 2012, when the commissions were combined, than during the 14 years before 2012, when they were separate. The 32-unit Ledyard Meadows Estates at 807 Colonel Ledyard Highway, built in 2018, is the only example of quality development between 2012 and today that I am aware of.

Without design guidelines, an architectural review board, parking, a reasonable height limit, and special permit requirements, it is likely the applications that are expected for Sweet Hill Farm, the Cartway property, and properties in Ledyard Center will be for lower quality developments that, because special permits are no longer required, could place the preservation of the character of our Town at risk. Dollar General is a good example.

The regulations should not have been relaxed after 2012 for the sake of development. Quality developments encourage the development of more quality projects, which improve our Town. Conversely, low-quality developments encourage more low-quality similar projects, ultimately diminishing the character and appeal of our Town.

By nature, volunteers on planning commissions tend to favor economic growth and support recommendations from the Economic Development Commission. They tend to be concerned with growth, water and sewer, affordable housing, open space, subdivisions, and the

avoidance of urban sprawl. They are also more likely to support growth for the sake of growth to increase the tax base.

Members of zoning commissions, on the other hand, are more responsive to concerns regarding the quality of life, traffic, protecting the character of our Town, improving and protecting safety and health, and protecting property values and natural resources. Members of zoning commissions tend not to support growth for its own sake.

For example, the zoning commission once spent hours deliberating on regulations regarding whether chickens and miniature horses should be allowed in residential districts. I suspect most volunteers on a planning commission would prefer to work on the Plan of Conservation and Development and on long-term planning for our Town's future.

Between 1971 and 2012, while the commissions were separate, the zoning commission met for about 3 hours twice a month. The planning commission also met for about 2-3 hours, but only about once a month. After they were combined, the Commission continued to meet for only about 2 or 3 hours, usually once each month.

How can the combined Commission do a good job in about 3 hours per month, when it previously required about 9 hours per month when they were separate? It cannot, unless it outsources much of its zoning or planning responsibilities.

This is demonstrated by the Commission's recent failure to address the omissions and ambiguities in the current zoning regulations and the conflicting goals in the Plan of Conservation and Development. For example, the costly GFI litigation was at least partially caused by a deficient definition of excavation as a major land use, which GFI mistakenly interpreted as allowing the quarrying of Mt. Decatur.

Because of the amount of work and effort required to be knowledgeable in both zoning and planning, volunteer commissioners on combined planning and zoning commissions, due to lack of knowledge and time, often have no choice but to accept guidance from the town planner, who does not live in our Town and may not care about its future. The Planner may also be biased in favor of or opposed to a development or policy, or may present conflicting information without the Commission's knowledge.

Separate commissions would also save money. If separate, the Zoning Commission would have more time to prepare and review its zoning regulations, and the planning commission would have more time to update its Plan of Conservation and Development.

For example, our town planner recently asked for funds to hire a consultant to help her update the POCD, even though the Commission has not yet had time to resolve the conflicts in the current Plan of Conservation and Development, and the update is not due for another four years. She also asked for \$2,500 to hire a consultant to prepare a zoning regulation change to address the parking deficiencies in the current regulations for multifamily and mixed-use developments. These types of expenses would be reduced if the Town had separate zoning and planning commissions.

Separate commissions would help free up time for the town planner to focus on planning rather than administrative duties. Separate commissions also help to create a check-and-balance that would be good for the Town. They would also result in better regulations and development, as was the case until 2012, when the commissions were combined.

In conclusion, I urge the Planning and Zoning Commission to revert to separate commissions, as it did in 1971. It will be good for our Town and is worth considering.

Useful Links

CT State Statutes, Title 8 (Zoning, Planning, Housing, Economic and Community Development)

https://www.cga.ct.gov/current/pub/title_08.htm

Separate Commissions:

Zoning Commissions: Enabled by CGS Sec. 8-1, which grants municipalities the authority to create zoning commissions and divide the town into districts to regulate land use.

Planning Commissions: Enabled by CGS Sec. 8-19, which authorizes municipalities to establish planning commissions to manage subdivisions and adopt a Plan of Conservation and Development.

Enabling Transitions:

Planning and Zoning Commissions: Enabled by CGS Sec. 8-4a, which allows any municipality to establish a single, consolidated commission to carry out the duties of both separate commissions.

Separating P&Z Commissions: CGS Sec. 8-4b governs how a municipality can reverse a combined commission back into separate planning and zoning commissions.

POCD

CGS Sec. 8-23. **Preparation, contents, amendment or adoption** of plan of conservation and development.

CGS Sec. 8-23c. Governs appointment of **special committees to develop and make recommendations for the POCD**, including membership of such sub-committees.

Land Use Academy - UCONN

<https://clear.uconn.edu/lua/resources/>

Roles and Responsibilities of Local Land Use Officials - Planning Commission Aug 2023

https://clear.media.uconn.edu/wp-content/uploads/sites/163/2023/10/planningfactsheet.page_.pdf

Roles and Responsibilities of Local Land Use Officials - Zoning Commission Aug 2023

https://clear.media.uconn.edu/wp-content/uploads/sites/163/2023/10/luafactsheetszoning.page_.pdf