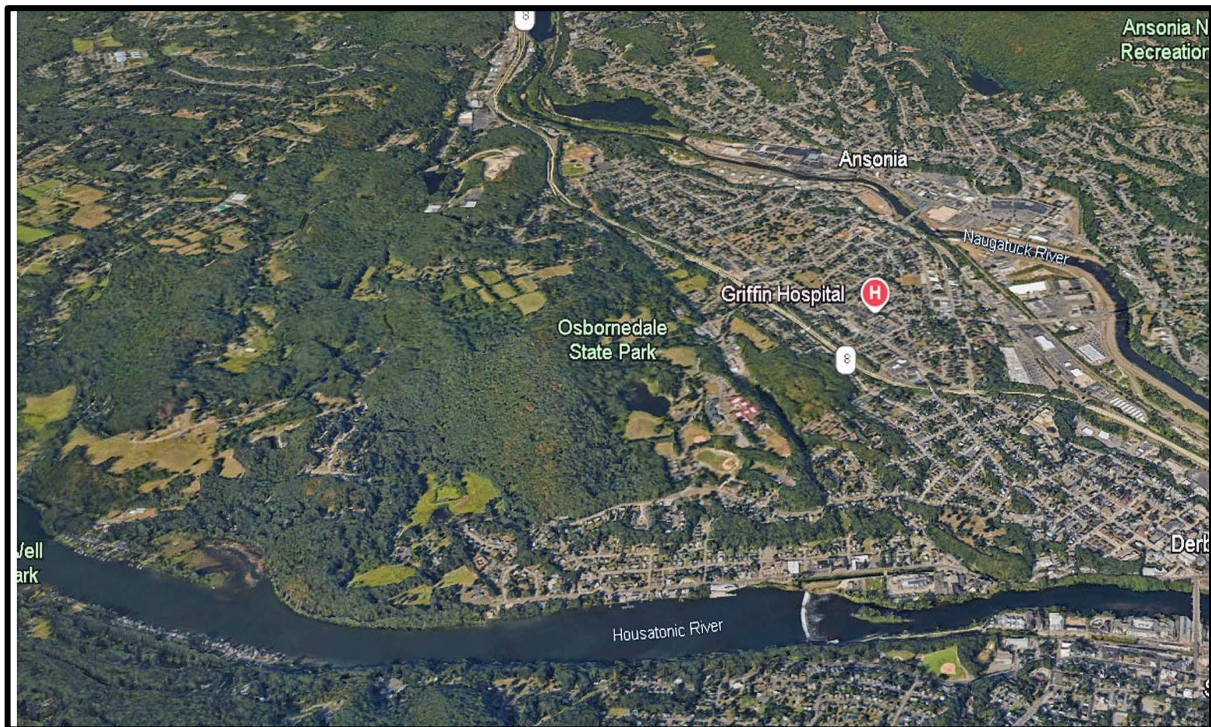




The Miller Planning Group
Land Use Solutions

Feasibility Study for 38 Great Hill Road, Derby, Connecticut

Prepared for the Eddy Alan Block Irrevocable Trust



May 12, 2025

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By Marc J Garofalo MPA, MMC, MCTC at 11:26 am, Oct 16, 2026

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1. Introduction

The applicant requests a change in the zoning map from ICD, Industrial Campus District, to SDD, Special Development District. The SDD has special requirements and is linked to a specific proposed plan. A conceptual plan for the proposed development is being submitted, so this report is based on the conceptual plan. It studies the feasibility of a development proposal for a property at 38 Great Hill Road in Derby, Connecticut. The report addresses environmental constraints, community impacts, marketability, and public housing needs. It was prepared for the client but encouraged by the Economic Development Director of the City of Derby.

2. Site Characteristics



The site is 62 acres located in the west neighborhood of Derby near the northern border with Seymour and Ansonia. It has been used in agriculture for many decades.

The site fronts two town roads. The existing entrance is on Great Hill Road on the west, and Silver Hil Road fronts on the site's eastern boundary.

The site's terrain is varied. Elevations range from 200" ASL in the lower pastures and wetlands to over 340' ASL at the highest point. A series of wetland corridors with several small ponds runs through the site. The western side has wetland areas and gently sloped pasture areas. The most prominent hill is in the eastern area, near the frontage on Silver Hill Road.



3. Proposed Development

A zone change is being requested to permit this development. The Plan is for a residential neighborhood with some commercial uses. The proposed components are:

- 240 apartments in 5 buildings
- 20 townhouse-styled condominiums
- 26 two and three-family houses.
- 27 single-family houses.
- A 10,000-square-foot community building for a daycare center, small convenience store, gymnasium, and small food servers for beverages, sandwiches, and similar products. It will be small, with approximately a dozen seats.
- Walk in medical center of 4,800 square feet.
- The existing house, barn, and event hall will be repurposed and integrated into the development. The existing house, for will be preserved and renovated to serve as a community center, maintaining the area's historical character.
- 14-acre public park to be donated to City of Derby.

Most of the development will occur within the eastern section of the property, where the most prominent hill is. Some earth removal will be required to create a developable area on the hill. This process will be carefully managed to minimize environmental impact, and any disturbed areas will be restored to their natural state.

The hill at the southern part of the property, consisting of 14 acres, will be dedicated to the City of Derby for use as a public park. There are great views at the top of that hill.

The major access will be from Silver Hill Road. Two intersections with Great Hill Road will provide additional access.

4. Neighborhood

The site is within the West Neighborhood of Derby, which is the least urbanized part of the City. A large part of this area is within Osborndale State Park, which is adjacent to and across the road from the subject site. The area along Roosevelt Boulevard, just south of the subject site, is developed with houses on mostly one-half-acre lots, with that section of Roosevelt Boulevard containing some commercial and industrial uses.

The site is in the hilly northern part of the City. Osborndale State Park is just east of the site. South of the property is a single-family neighborhood with lots averaging approximately one-half acre. Other, less densely developed single-family areas are west of the site, across Good Hill Road.

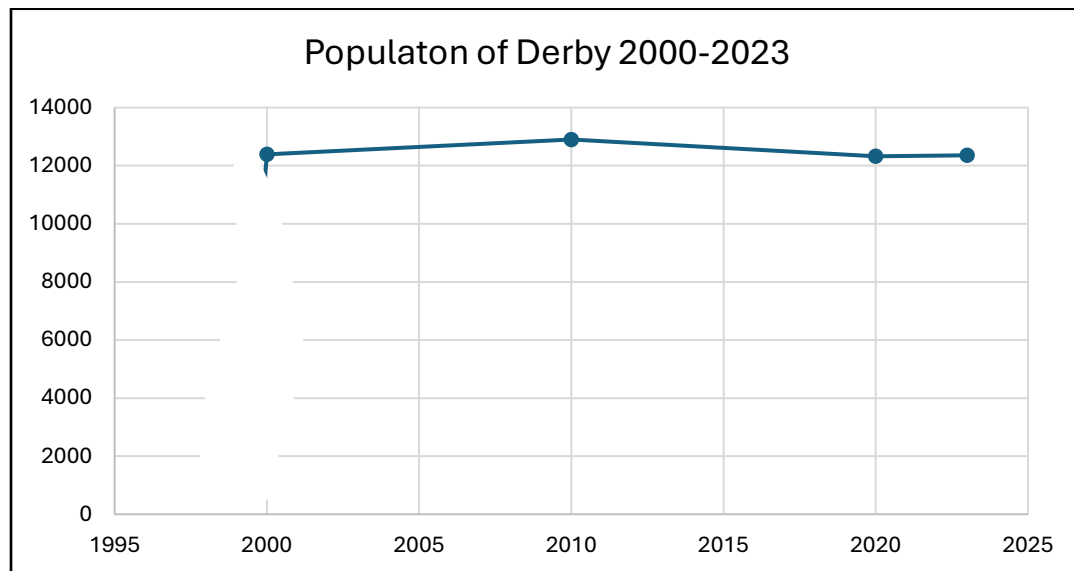
The boundary with the Town of Seymour is directly north of the site and is sparsely developed, except for the Fountain Lake industrial area.

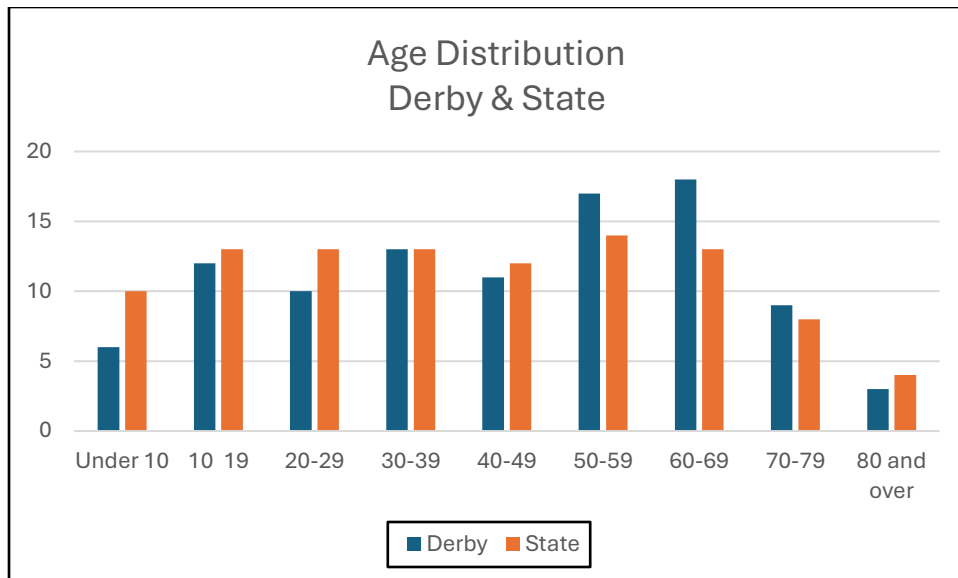
5. Demographic Characteristics

The population of Derby has remained stable since 2000, declining slightly between 2000 and 2023,

Year	Population
2000	12,391
2010	12,902
2020	12,325
2023	12,359

American Community Survey, US Census Department

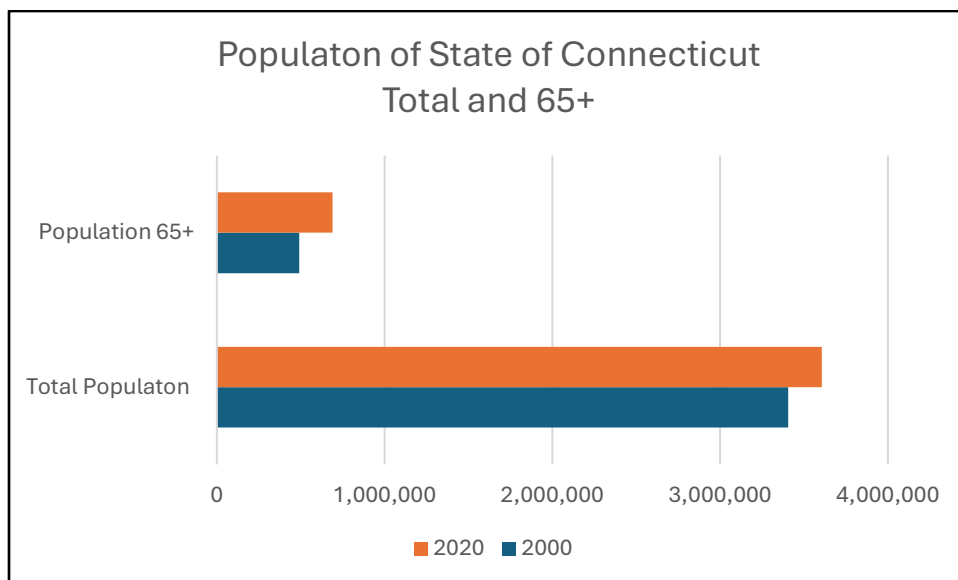




This data indicates that Derby has a higher percentage of people fifty and older than the State.

Meanwhile, the State of Connecticut is getting older. The number of residents 65 and over increased by 200,000 between 2000 and 2020.

Year	Total Population	Population 65+
2000	3,405,944	490,197
2020	3,605,565	690,031

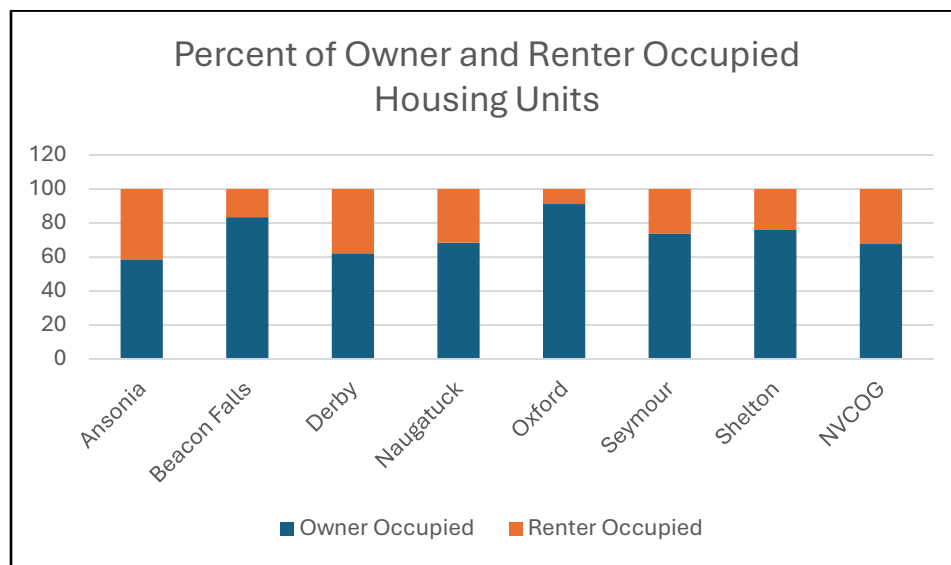


The population of Connecticut increased 5.9% over this 20-year period. In contrast, the number of residents 65 and older increased by 40.8%.

6. Housing in Derby and Region

Percent of Owner and Renter Occupied Housing Units

	Owner Occupied	Renter Occupied
Ansonia	58.6	41.4
Beacon Falls	83.4	16.6
Derby	62.2	37.8
Naugatuck	68.3	31.7
Oxford	91.1	8.9
Seymour	73.8	26.2
Shelton	75.9	24.1
NVCOG	67.6	32.4



Derby's rental segment is higher than the overall regional average, except for Ansonia and all other communities along the Naugatuck River.

Total Households	5,775
Average Household Size	2.13
Total Families	3,269
Average Family Size	2.81
Percent of households with one or more under 18	18.6%
Percent of households with one or more persons 60 years or older	49.0%
Percent of households with one or more persons 65 years or older	37.1
Householder living alone	17.5%

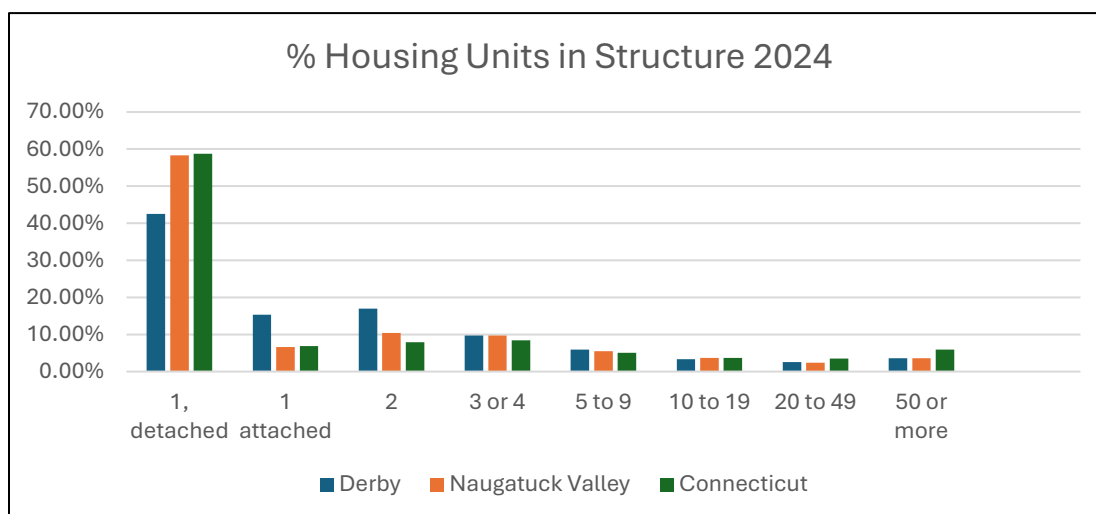
Owner Occupied Housing 2.20
 Renter Occupied Housing 2.01

This data indicates that there is no significant difference in the average household size of owner-occupied and renter-occupied units. In most situations, larger households are more likely to live in an owner-occupied unit, with smaller households in renter-occupied units.

Units in a Structure 2024

	Derby	Naugatuck Valley	Connecticut
1 detached	2,652 42.5%	111,793 58.3%	898,891 58.7%
1, attached	957 15.3%	12,635 6.6%	91,79 46.0%
2	1,060 17.0%	18,09 59.4%	120,419 7.9%
3 or 4	606 9.7%	18,531 9.7%	128,942 8.4%
5 to 9	368 5.9%	10,577 5.5%	78,127 5.1%
10 to 19	203 3.3%	7,090 3.7%	56,353 3.7%
20 to 49	163 2.6%	4,512 2.4%	54,248 3.5%
50 or more	226 3.6%	6,992 3.6%	90,777 5.9%
Mobile home	0 0.0%	1,281 0.7%	11,257 0.7%
Boat, RV, van, etc.	0 0.0%	160 0.1%	524 0.0%
Total	6,235 100.0%	191,666 100.0%	1,531,332 100.0%

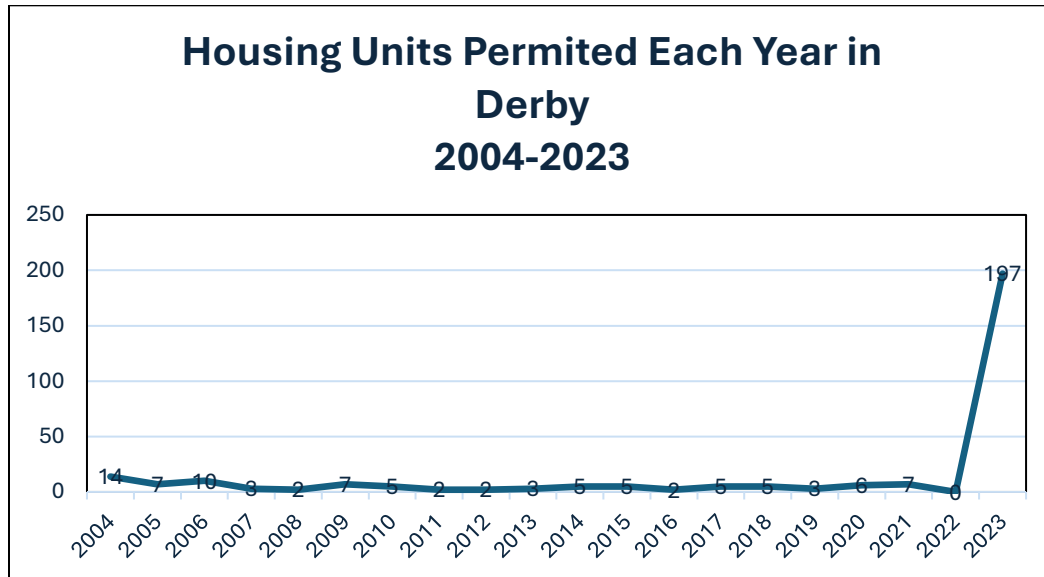
Source: 2022 American Community Survey, 5-year estimates, Table B25024



In Derby (2018 - 2022), there are **6,235 total units**.

Of the total number of occupied units:

- **63.8% are owner-occupied** (3,645)
- **36.2% are renter-occupied** (2,068)



The amount of new housing produced in Derby was very low for most of the past twenty years until 2023 when the permits for Trolley Pointe were issued.

7. Land Use Planning Factors

1. The subject property is the largest developable property in the City of Derby. Development of it is the best opportunity to expand the City's tax base. Derby is a small city, densely developed with limited developable land. The development planned for the site would be a logical extension of the City's development patterns, as it is near old established residential neighborhoods to the south, just off Roosevelt Boulevard.
2. Great Hill Road accesses the site on the west and Silver Hill Road on the east. This road extends north into Seymour and Oxford, while Silver Hill Road goes into Ansonia.
3. The site is currently zoned I-C, Industrial Campus. "Permitted principal uses in the I-C Zone shall be as follows: manufacturing and assembly facilities, office buildings, conference centers, research or technical development facilities, including laboratories, libraries, data processing, publication, self-storage and warehouse facilities, storage associated with manufacturing and assembly facilities, recreation facilities, continuing care retirement communities and related facilities in connection with such uses, and cannabis establishments,"¹
4. Today's market does not favor campus-type businesses, and industrial parks are no longer economically desirable. Most existing business parks developed during the 1970's and 1980's suffer from high vacancies, and many are being redeveloped into residential – mixed use communities. The site's access is suitable for residential development. It is not suitable for industrial and related development.
5. Topography—The site's topography is somewhat challenging, but it is suitable for development with flexibility of design. Residential areas with small mixed uses are the most appropriate development type as they do not require large footprints for buildings or parking lots.
6. The road system is adequate to support additional residential traffic. Great Hill Road goes into Seymour and Oxford, becoming Route 344, with an interchange with Route 8.
7. The shortage and cost of housing are major impediments to the continued economic growth of Connecticut, including the lower Naugatuck Valley. Younger professionals are leaving the State because of the lack of housing. The shortage of multi-family rental housing is particularly severe.
8. The property's buildout with the existing Industrial zoning would increase truck traffic in the area. The traffic report indicated that the existing road system has sufficient capacity to accommodate the residential mixed-use proposal. The only truck traffic would be deliveries, as is the case in all residential neighborhoods.

¹ Derby Zoning Regulations, Section 195-22

8. Market Factors

The housing situation throughout southern and western Connecticut has changed dramatically over the past two decades.

- There was no general housing shortage in Connecticut during the 1980's and 1990's, although there was a shortage of affordable housing for lower income people.
- The population of Connecticut increased slowly between 2000 and 2020 by 1.2%.
- Since 1980, most residential production has been single-family, mostly occurring in the outer suburbs and certain rural communities within the growth paths. The predominate form of development was greenfield new subdivisions of undeveloped land, with lot sizes larger than one acre.
- There was a flurry of condominium development mostly in established suburban communities during the 1980s and 1990s. Most of it was age restricted as it was more accepted by suburban communities as they generated property tax revenue without any potential increase in educational costs.
- Thus, residential development patterns ignored the enormous needs and demands of large segments of the population. Household size has been decreasing for the past several decades, including singles beginning their careers, couples without children, older adults living alone, divorced parents with one or two children, and others, for some reason, did not wish to live in a single-family house.
- The Affordable Housing Act of 1989 was intended to increase multi-family development and make housing affordable for workers. It created a judicial override for suburban and rural communities that resisted multi-family development. More multi-family developments occurred in suburban neighborhoods, although each development often took several years and required high legal assistance costs.

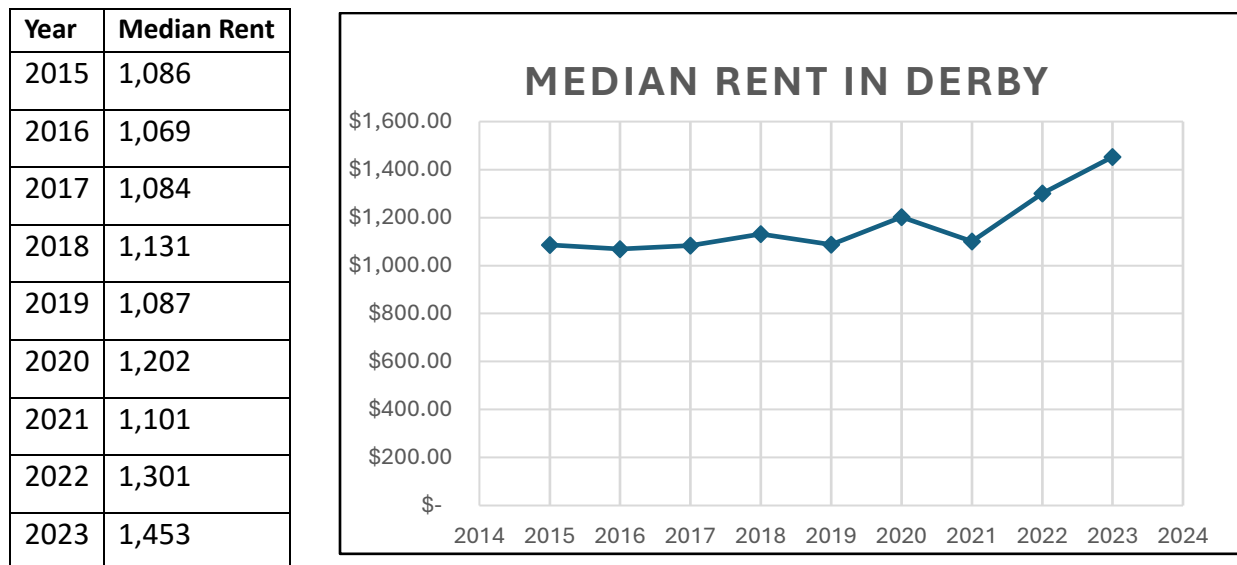
The result is that Connecticut is facing a housing shortage. Which has negatively impacted economic growth, as many businesses have a labor shortage.

The lack of multi-family housing is being felt in Derby. Griffin Hospital is the City's largest employer. The medical field is one of the fastest-growing industries in the State, employing a large cross-section of labor categories, most of them skilled and well-paid. It has been difficult for Griffin Hospital to attract enough employees, a situation shared by the other regional hospitals and employers.

Housing production has started to meet demand over the past decade. Multi-family housing has been the tightest sector, as little multi-family housing was constructed between the late 20th century and the beginning of the 21st century.

The following chart indicates that the tight market has resulted in rising rents.

Median Rent in Derby 2015 to 2023



The rent remained stable until 2022 when it increased. The median rent in Derby and other communities within the Naugatuck Valley has remained lower than neighboring communities in Fairfield and lower New Haven Counties because much of the rental inventory in Derby is in old buildings, such as the two, three, and four-unit buildings in the older neighborhoods.

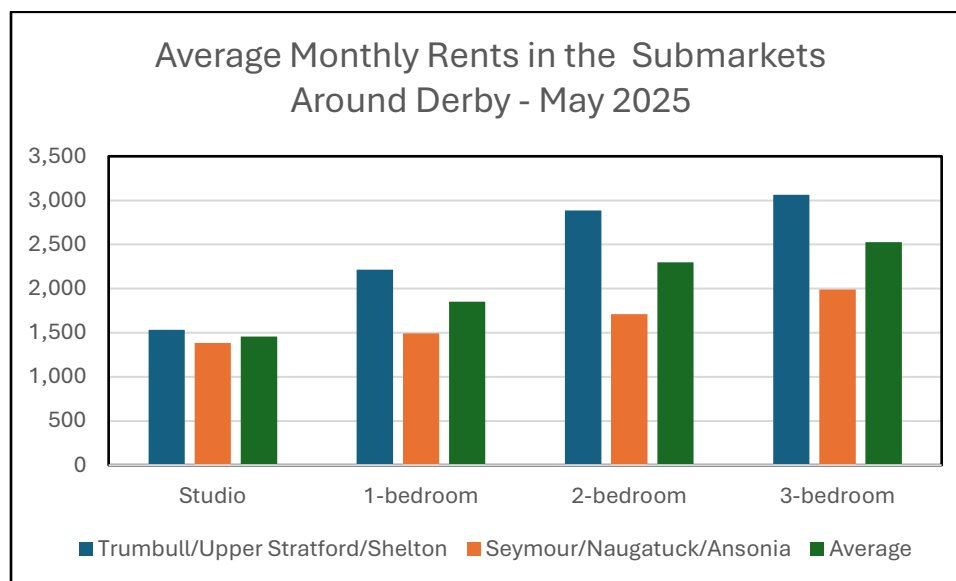
For this analysis, we are using a functional submarket, lower Route 8 corridor., consisting of Shelton, Derby, and Ansonia. This area has been experience more multi-family development, during the past decade.

We have examined rents and occupancy levels for large multi-family projects within this submarket.

We also limited the comparison to significant apartment developments constructed within the last twenty years. Most comparable are in Shelton, with several downtown, just across the Housatonic River from Derby.

We looked at some regional rental levels with Apartments.com which utilized two submarkets bordering Derby north and south: Trumbull/Upper Stratford/Shelton to the south and Seymour/Naugatuck/Ansonia to the north. The average rent for May 2025 is shown in the chart below.

	Studio	1-bedroom	2-bedroom	3-bedroom
Trumbull/Upper Stratford/Shelton	1,532	2216	2886	3062
Seymour/Naugatuck/Ansonia	1386	1492	1710	1992
Average	1459	1854	2298	2527



This data includes all rental units listed on apartments.com, including older and smaller rental properties and the more contemporary larger apartment complexes. Therefore, it understates projected rents.

Rents in this area vary. They are higher in Trumbull and Fairfield and lower along the Route 8 corridor through Ansonia and Naugatuck. As the desirable sites in the southern areas are developed, development is moving north, as illustrated by construction underway in Derby and Ansonia.

An essential factor is that rent in Seymour/Naugatuck/Ansonia has increased by 0.7% in the past year and 2.0% in Trumbull/Upper Stratford/Shelton. The rising rents are expected to continue despite the number of products coming online.

Derby has been attracting developer interest with the new multi-family projects currently underway. Derby can be considered linked to Shelton as a submarket with similar developmental conditions. The two downtown areas are connected by the improved bridge with its bicycle lanes and an improved walkway. Those linkages make Shelton the best basis for comparison.

The existing conditions are very favorable for multi-family development in Derby. More importantly, projections indicate that the shortage of multi-family residences will remain with us for at least the next 5 to 10 years. Suitable locations for large scale multi-family residences are scarce due to zoning restrictions, topography, environmental limitations, and lack of infrastructure.

The following table contains information about the comparative properties we used. Three new examples are still under construction: 158 Main Street, Ansonia, Trolley Point, and Cedar Village in Derby. They are all in the process of renting, so their rental levels were included in the projection of rent levels. Sterling Towers and Derby Manor are older properties and have lower rents, but they were included in the calculation of the occupancy. All had very low vacancies, with several having no vacancies and a waiting list.

Property	Location	Studio		1 BR		2BR		Total Units	Vacancy
Trolley Pointe	90 Main St, Derby	\$1,368-\$2,100	536-712	\$1,466-\$2,550	666-978	\$1,759-\$2,550	975	105	Not completed
Cedar Village at Minerva Square	67-71 Minerva St. Derby	\$1350-\$1475	580	\$1675-\$1,750	516-580			82	Not completed
158 Main St.	Ansonia	\$1,400 - \$1475	500				6 Recently completed	0	NA
502 on Howe	Shelton		435-512	\$1,725-\$1,850	657-715				
Cedar Village at Carroll	Shelton	\$1,400-\$1,450	521			\$2,200	1,100-1,150		
Bridge Street Commons I & 2	Shelton	0		\$1,800 - \$1,950	675-785	\$2,395-\$2,750	975-1280	116	4
Merion Riverwalk	108 Canal St Shelton			\$2,190-\$4,521	680-780	\$2,834-\$5,684	1,067-1,202		6
Derby Manor	33 Roosevelt Dr Derby	\$1,185 - \$1,400	600-650	\$1,355 - \$1,550	650-800	\$1,640-\$1,800	750-850	63	3
Sterling Towers	50 Olivia St Derby		425		545			50	0

Yard Matrix, and independent real estate research data firm considers the entire State except for Windham County, as the "Bridgeport – New Haven" market. Their December 2024 report had the following findings:

- Advertised rents are at \$2,050, an increase of 5.3% from the previous year. This places Bridgeport-New Haven third in year-over-year rent growth within the national market.

- Multi-family housing demand has been positive, with 3,655 units absorbed during 2024, a 21.7% increase over 2023.
- Employment in Bridgeport-New Haven grew by 1.6% during 2024, while hourly wages increased by 4.4% to \$38.79.

This multi-family development has not reached a saturation point of demand, as vacancies are very low in these developments, with many having waiting lists. Statewide, there are many projects in the pipeline. Locally, the major projects underway are mill building conversions in downtown Ansonia.

The market analysis section of the feasibility study is based on the existing economic and demographic situation and projections for the future. The realistic period for this project is three to five years, assuming no significant social or economic disruptions.

The strong demand for quality multi-family housing is expected to continue for the foreseeable future, and the proposed development is designed and positioned to benefit from this demand.

9. Fiscal Impacts on the City

When built, this project will generate additional tax revenue for the City. Although a detailed fiscal impact is impossible since we are dealing with conceptual plans, we can provide a "ballpark" analysis based on the conceptual plans. We are using the following assumptions, which are conservative regarding the amount of revenue to be produced.

- Valuation for each apartment unit: \$2250,000
- Condominium Unit* \$375,000
- Single-family house \$600,000
- Automobile Valuation per unit \$15,000
- Education costs to City per pupil** \$12,368
- Commercial valuation per square foot***. \$250

*Includes two and three-family houses

**The educational cost per pupil for FY 2025-2026 is \$23,291, of which 53,1% is paid with City revenue. Estimated pupils for each mode of living are 0 per one-bedroom apartment, 0.25 per two-bedroom apartment, 0.5 per condominium, and 1.25 per single-family house. The apartment calculations assume an equal number of one and two-bedroom units.

***This does not include any equipment, finishings, or furnishings.

Upon building out, the City would receive \$ 3.2 million annually. The projected annual cost of education would be \$1.1 million based on an average price per pupil.

	Market Value	Assessment	Units	Tot. Assessments	Prop Tax
Valuation for each apt unit	\$225,000	\$173,250.00	240	\$41,580,000	\$1,796,256
Condominium Unit	\$375,000	\$288,750.00	46	\$13,282,500.	\$573,804
Single-family house	\$600,000	\$462,000.00	27	\$12,474,000	\$538,877
Automobile Valuation per unit	\$15,000	\$11,550.00	313	\$3,615,150	\$156,174
Commercial valuation per sf	\$250	\$192.50	15,000	\$2,887,500	\$124,740
				\$73,839,150	\$3,189,851

City Cost of Education

Education cost to City per pupil	Units	Number of Pupils	Cost
One Bedroom Apartments	120	0	
Two-bedroom apartment	120	30	
Condominiums, 2 & 3family	46	23	
Single-family house	27	33.75	
Total Educational Cost		86.75	\$1,072,882.45

10. Conformance with the Derby Plan of Conservation and Development.

The Derby Plan of Conservation and Development was adopted in 2016. As with any municipal POCD, it is a guide for major land use decisions. The Plan includes several objectives and strategies, as well as analyses of important issues. These are intended for use by the Planning and Zoning Commission and other town agencies in their deliberations. The following components of the 2016 POCD are relevant to this application:

Overall Objectives and Strategies, Page 9

“Provide more housing for seniors and young professionals.”

Fiscal Issues, Page 32

“Tax Base Derby is not considered to have a wealthy tax base since it has less property wealth (measured by Equalized Net Grand List) than the state average. This makes Derby eligible for more state aid under current state formulas. Derby has a lower business tax base on a per capita basis than some surrounding communities, but a higher percentage than neighboring Ansonia and Seymour”. Page 3

Water Quality and Stormwater Management, Page 52

“Encourage site design that minimizes imperviousness of streets, parking lots, driveways, and structures.”

Land Use, Page 100

“One of the primary factors impeding additional commercial growth in Derby is lack of physical space. The City is fairly developed with only a few areas of developable land remaining, which include large tracts of vacant land in the far east and west sides of the City that have been zoned for industrial use.”

Derby Economic Development Zone, Page 101

The Plan identified an area broadly encompassing the subject property within an Economic Development Zone. A detailed description of the uses within the zone were not included. As discussed previously within this report, the subject property is not suitable for industrial uses. The concept of economic development now includes uses which would improve the fiscal and economic base of the community. The proposed development is the best choice to utilize this property for the City’s economic growth.

11. Impacts

A development project of this magnitude is bound to impact the community significantly. The proposed development, primarily residential with a few commercial uses, holds the potential to bring about positive changes and opportunities to the area.

- A. It would improve the City's fiscal condition, The City's grand list would increase by \$73.4 million, and generate \$3.2 million in annual tax revenue upon completion, an increase of 6% above the current tax revenue. The additional costs, primarily for education, would be one-third of the additional revenue.
- B. It would improve the City's and neighboring communities' economic climate by increasing the housing stock for existing and potential employees. One of the major complaints of Connecticut businesses has been a shortage of employees since the pandemic. The largest employer in the City, Griffin Health Care, supports this project as it greatly assists them in attracting and retaining employees.
- C. It would offer more housing choices to existing Derby residents who wish to remain but have left the City because of limited housing options.
- D. Existing utilities are available for the developer to extend for this development.
- E. The roads surrounding the project have adequate capacity to serve the proposed development, although some improvements are likely needed.
- F. Osborndale State Park, adjacent to the new facility, can fulfill many of the new residents' recreational desires.
- G. This project is the only opportunity to create a contemporary, sustainable neighborhood. Including commercial uses and higher residential densities facilitate an internally walkable community.
- H. The new development would attract young professionals as well as older residents. Young professionals are the cohort that spends more on discretionary spending, which would also benefit the local economy.
- I. The City of Derby will receive a new park - open space. The 14 acres site could include paths to the top of the hill, to enjoy the view of the two rivers below.

This development can be a desirable place to live. Special amenities would include a commercial gym, and a coffee shop / take out place. It could include other recreational amenities and has the benefit of the preservation of the natural environment which would add to the "country in the city" environment.

Appendix A Pictures of Comparable Properties



Trolley Pointe, Derby



Cedar Village at Minerva Square - Derby

Architectural Rendering



158 Main Street - Ansonia



502 on Howe - Shelton



Cedar Village at Carroll - Shelton



Bridge Street Commons - Shelton



Meron Riverwalk - Shelton



Derby Manor - Derby



Sterling Tower- Derby

Appendix B Consultant Qualifications

Brian J. Miller, AICP - Principle

The Miller Planning Group

RESUME

Principle TMPG, LLC

Previous Experience

- Director of Development Services, Town of Berlin
- Comprehensive Planner, City of Longmont, CT
- Consulting Planner, West Haven, Tolland, Oxford, Middlebury, Hamden, Beacon Falls, Orange

Consulting Assignments

- Economic Development Strategies
- Land Use Strategies
- Development Permitting
- Municipal Planning
- Community Revitalization

Education

- BA Economics, University at Albany
- Masters Urban Planning University of Illinois

Other Positions

- Cheshire Economic Development Com.
- Connecticut Blue Ribbon Commission on Affordable Housing 1999
- Cochairman of Legislative Committee of CT Chapter American Planning Association

Brian Miller has over 40 years of planning experience throughout the tri-state area, but particularly in the State of Connecticut. He is the president and owner of The Miller Planning Group, LLC.

Brian has served as the staff planner a range of Connecticut communities, including West Haven, Milford, Woodbury, Beacon Falls, Middlebury, Stafford, Oxford, and Orange. He has extensive experience with the preparation of Plans of Conservation and Development for numerous Connecticut municipalities such as Beacon Falls, North Branford, Groton, Tolland, Oxford, West Haven and Marlborough. He recently completed the Plan for East Haven and has worked on Comprehensive Plans for Poughkeepsie in New York as well as the Boroughs of Little Falls and North Haledon in New Jersey.

Economic development has been a component of municipal planning. He has worked with the Connecticut Economic Resource Center (CERC) as an Economic Development Consultant, Brian assisted and coordinated the statewide municipal economic development efforts. There he also part of a team which formulated an action strategy for revitalization of downtown Willimantic, a business retention strategy for the City of Meriden, and a Municipal Economic Strategy for Tolland, Connecticut. A recent assignment has been the update of the East Have Plan of Conservation and Development, with an emphasis on economic development in certain important areas of the Town. His experience includes drafting revisions to Zoning Regulations for communities throughout Connecticut,

There have also been many assignments for private sector clients. This includes market analysis, fiscal impact analysis, neighborhood impact analysis, design and preparation of applications for zoning amendments. He has also worked on plans for areas and neighborhoods, such as a study for the Town of Orange for the Edison Road – Marsh Hill Road area, re-use of the Baltic Mill property in Sprague, downtown Beacon Falls, Plainville and Willimantic and the Blue Hill Avenue Corridor of Hartford.

Recent assignments have included working with the Affordable Appeals Act applications, both on the behalf of developers as well as the municipalities experiencing these potential developments.

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The Miller Planning Group
Land Use Solutions

FIRM DESCRIPTION

The Miller Planning Group (MPG) is a land use, economic development and community planning firm with an office in Wallingford, Connecticut. Our roots in land use planning go back forty years and include a broad range of land use and development issues.

Our practice includes governmental and private clients throughout the northeast, working with developers, attorneys, cities, towns, on a wide range of planning issues. We accomplish the objectives of our clients through comprehensive analyses, based upon our experience in “real world” situations. MPG works with a network of other professionals, to provide a full range of services to our clients.

For private sector clients, MPG offers planning and development services from project inception to project approval. Our services include land planning and site feasibility studies, housing analysis, community and fiscal impact analyses, zoning analysis, market analysis and feasibility studies, and economic development. A keen understanding of the public sector allows MPG to assist developers obtain the approvals necessary to complete their residential, industrial and commercial projects in a timely fashion.

For the public sector, MPG provides comprehensive planning, zoning ordinance revision and preparation; redevelopment, housing and community development; affordable housing planning and implementation; site and subdivision plan review; economic development and revitalization. The firm has been retained by municipalities and public agencies to provide planning expertise on specific projects as well as on a continual basis. Our public clients have range from small rural communities to established urban centers.

MPG and its associates are aware of the sometimes-conflicting goals between various interests. The firm’s extensive experience operating on each side of the review table gives us the ability to provide insightful solutions helping to bring these conflicting goals in harmony with one another. We utilize this perspective on behalf of our clients within the planning and development processes, expediting the process to save money, time and effort for all interests, achieving solutions that are in the public interest.

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By Marc J Garofalo MPA, MMC, MCTC at 11:26 am, Oct 16, 2026