

C Community Development Committee
Meeting date: February 16, 2010

E Environment Committee
Meeting date: February 9, 2010

ADVISORY INFORMATION

Date: February 2, 2010
Subject: City of Lilydale 2030 Comprehensive Plan Update
Tier II Comprehensive Sewer Plan
Review File No. 20575-1
District(s), Member(s): District 13, Councilmember Rick Aguilar
Policy/Legal Reference: Minnesota Statutes Section 473.175
Staff Prepared/Presented: Denise P. Engen, Principal Reviewer (651-602-1513)
Phyllis Hanson, Local Planning Assistance Manager
(651-602-1566)
Kyle Colvin, Engineering Services Asst. Manager
(651-602-1151)
Division/Department: Community Development / Planning and Growth Management
Environmental Services/ Engineering Services

Proposed Action

That the Metropolitan Council adopts the attached Advisory Comments and Review Record, and the following:

Recommendation of the Community Development Committee:

1. Authorize the City of Lilydale (City) to put its 2030 Comprehensive Plan Update into effect;
2. Adopt the revised forecasts for the City of Lilydale as shown in Table 1 in the Review Record, and adopt the City's revised share of the region's affordable housing need as detailed under Forecasts in the Review Record; and
3. Advise the City to Participate in Council activities to monitor redevelopment in developed communities.

Recommendation of the Environment Committee:

Approve the City of Lilydale's Tier II Comprehensive Sewer Plan.

ADVISORY COMMENTS

City of Lilydale 2030 Comprehensive Plan Update and Tier II Comprehensive Sewer Plan

Review File No. 20575-1, Council Business Item No. 2010-56

The following Advisory Comments are part of the Council action authorizing the City to implement its 2030 Comprehensive Plan Update (Update) and approving the City's Tier II Comprehensive Sewer Plan:

Community Development Committee

1. The Council-adopted *Local Planning Handbook* states that the City must take the following steps:
 - (a) Adopt the Update in final form after considering the Council's review recommendations; and
 - (b) Submit one electronic copy and one hard copy of the Update to the Council. The electronic copy must be organized as one unified document.

A copy of the City Council resolution evidencing final approval of the Update should be submitted to the Council.

2. The Council's *Handbook* also states that local governments must formally adopt their comprehensive plans within nine months after the Council's final action. If the Council has recommended changes, local governments should incorporate those recommended changes into the plan or respond to the Council before "final approval" of the comprehensive plan by the governing body of the local governmental unit (Minn. Stat. § 473.858, subd. 3).
3. Local governmental units must adopt official controls as described in their adopted comprehensive plans and must submit copies of the official controls to the Council within 30 days after official controls are adopted (Minn. Stat. § 473.865, subd. 1).
4. Local governmental units cannot adopt any official controls or fiscal devices that conflict with their comprehensive plans or which permit activities in conflict with the Council's metropolitan system plans. (Minn. Stat. §§ 473.864, subd. 2; 473.865, subd. 2). If official controls conflict with comprehensive plans, the official controls must be amended within nine months following amendments to comprehensive plans (Minn. Stat. § 473.865, subd. 3).

Environment Committee

1. The Council-approved Tier II Comprehensive Sewer Plan becomes effective only after the Update also receives final approval by the City's governing body. After the Update receives final approval by the City and the Tier II Sewer Plan becomes effective, the City may implement its Update to alter, expand or improve its sewage disposal system consistent with the Council-approved Tier II Sewer Plan.
2. A copy of the City Council Resolution adopting its Update, including the Tier II Sewer Plan, must be submitted to the Council.

Background

The City of Lilydale (City) is a small first-ring suburban community of approximately 570 acres, located in Dakota County, on the Mississippi river. It is bordered on the north and west by the city of St. Paul, to the east and south by the city of Mendota Heights, and to the southeast by the city of Mendota (Figure 1).

The *2030 Regional Development Framework* (RDF), as adopted by the Metropolitan Council (Council) in January 2004, identified Lilydale as within the "Developed Community" geographic planning area, (Figure 2).

The City submitted its 2030 Comprehensive Plan (Update) to the Council for review to meet the Metropolitan Land Planning Act requirements (Minn. Stat. 473.175) and the Council's 2005 Systems Statement requirements.

Rationale – Standard of Review & Findings

1. Does the proposed Update conform to Regional Systems Plans?
2. Is the Update consistent with Metropolitan Council policies?
3. Is the Update compatible with plans of adjacent governmental units and plans of affected special districts and school districts?

Conformance with Regional Systems Plans:

- | | |
|---|-----|
| 1. Regional Parks | Yes |
| 2. Transportation including Aviation | Yes |
| 3. Water Resources Management
(Wastewater Services and Surface Water Management) | Yes |

Consistent with Council Policy Requirements:

- | | |
|--|-----|
| 1. Forecasts | Yes |
| 2. Housing | Yes |
| 3. <i>2030 Regional Development Framework</i> and Land Use | Yes |
| 4. Individual Sewage Treatment Systems (ISTS) Program | Yes |
| 5. Water Supply | Yes |

Compatible with Plans of Adjacent Governmental Units and Plans of Affected Special Districts and School Districts

- | | |
|-----------------------------|-----|
| Compatible with other plans | Yes |
|-----------------------------|-----|

Known Support / Opposition

There is no known opposition.

REVIEW RECORD

City of Lilydale 2030 Comprehensive Plan Update

STATUTORY AUTHORITY

The Metropolitan Land Planning Act (MLPA) requires local units of government to submit comprehensive plans and plan amendments to the Council for review and comment (Minn. Stat. § 473.864, Subd. 2). The Council reviews plans to determine:

- *Conformance with metropolitan system plans,*
- *Consistency with other adopted Plans of the Council, and*
- *Compatibility with the Plans of other local jurisdictions in the Metropolitan Area.*

The Council may require a local governmental unit to modify any plan or part thereof if, upon the adoption of findings and a resolution, the Council concludes that the Plan is more likely than not to have a substantial impact on or contain a substantial departure from metropolitan system plans (Minn. Stat. § 473.175, Subd. 1).

Each local government unit shall adopt a policy plan for the collection, treatment and disposal of sewage for which the local government unit is responsible, coordinated with the Metropolitan Council's plan, and may revise the same as often as it deems necessary. Each such plan shall be submitted to the Council for review and shall be subject to the approval of the Council as to those features affecting the Council's responsibilities as determined by the Council. Any such features disapproved by the Council shall be modified in accordance with the Council's recommendations (Minn. Stat. § 473.513).

CONFORMANCE WITH REGIONAL SYSTEMS

REGIONAL PARKS

Parks and Trails

Reviewer: Jan Youngquist, CD – Regional Parks System Planning, (651-602-1029)

The Update is in conformance with the *2030 Regional Parks Policy Plan* and conforms to the *2030 Regional Parks Policy Plan*. The regional parks system facilities in Lilydale include Lilydale-Harriet Island Regional Park; the Big Rivers Regional Trail, which connects Lilydale to Eagan and overlooks the confluence of the Mississippi and Minnesota Rivers; and the North Urban Regional Trail, which, once completed, will connect the Big Rivers Regional Trail in Lilydale to the Mississippi River Regional Trail in South St. Paul.

TRANSPORTATION

Roads and Transit

Reviewers: Elaine Koutsoukos (651-602-1717), Bob Paddock (651-602-1340), MTS – Systems Planning; Steve Mahowald – Metro Transit (612-349-7775)

The Update is in conformance with the *2030 Transportation Policy Plan (TPP)* adopted in 2004, and addresses all the applicable transportation and transit requirements of a comprehensive plan. The only metropolitan highway located in the city of Lilydale is I-35E. The Update identifies the addition of the third lane on I-35E from TH 110 to TH 5.

As stated in the CPU, the City lies within Transit Market Area III. Service options for Market Area III include peak-only express, small vehicle circulators, midday circulators,

special needs paratransit (ADA, seniors), and ridesharing. Dakota Areas Resources and Transportation for Seniors (DARTS) provides general public dial-a-ride service. ADA paratransit service is provided by DARTS and Metro Mobility.

Aviation

Reviewer: Chauncey Case, MTS – Systems Planning, (651-602-1724)

The Update is in conformance with the Aviation policies of the *TPP* and is consistent with Council aviation policy.

WATER RESOURCES MANAGEMENT

Wastewater Service

Reviewer: Kyle Colvin, ES – Engineering Services, (651-602-1151)

The Update is in conformance with the *Water Resources Management Policy Plan (WRMPP)*. The Update summarizes the City's vision for the next 20 years or to year 2030. It includes growth forecasts that are consistent with the Council's forecasts for population, households, and employment.

Current wastewater treatment services are provided to the City by the Metropolitan Council Environmental Services. Wastewater generated within the City is conveyed to and treated at the Metropolitan Council's Metropolitan Wastewater Treatment Plant located in St. Paul. The City is provided wastewater conveyance service through Council Interceptor 1-MH-401. The Update projects the City will have 650 sewer households and 550 sewer employees by 2030. The Metropolitan Disposal System with its scheduled improvements has or will have adequate capacity to serve the City's growth needs. The Update provides sanitary flow projections in 10-year increments. The rationale for the projections is given in the Update and determined appropriate for planning for local services.

Lilydale has been identified as a community impacted by wet weather occurrences. The City is currently on the Council's list of communities having an I/I reduction goal. The City has committed to mitigate excessive I/I at levels equal to the Council's Surcharge amount. At the request from the City, and as allowed under the Council's I/I Program, the City's surcharge is currently capped at a level equal to 25% of their annual Municipal Wastewater Charge. Remaining portions of the City's annual surcharge are not eliminated, but deferred to later years thus extending the time in which the City has to achieve their I/I reduction goal. The City's I/I mitigation plan completion date is currently at December 31, 2018.

The City is working with private landowners to correct sources of excess inflow that originate from private property. The City has taken steps to identify sources of I/I; these include, smoke testing of the sanitary sewer system, televising the sanitary sewer to search for potential sources of infiltration, and working with private entities that have known I/I issues. The City plans to routinely re-televising the sanitary sewer system to ensure the sewer remains in good condition and has not become a source of infiltration. The City also plans to inspect manholes and drains on public and private property to search for potential sources of inflow. A study to determine sources of excess stormwater inflow and a work plan to eliminate the sources is currently in progress and will be completed in 2010.

Tier II Comments

The Tier II Sewer Element of the Update has been reviewed against the requirements for Tier II Comprehensive Sewer Plans for developed communities. It was found to be

complete and consistent with Council policies. Upon adoption of the Update by the City, the action of the Council to approve the Tier II Plan (Plan) becomes effective. At that time, the City may implement its Update to alter, expand or improve its sewage disposal system consistent with the approved Plan. A copy of the City Council Resolution adopting its Plan needs to be submitted to the Metropolitan Council for its records.

Surface Water Management

Reviewer: Judy Sventek, ES – Water Resources Assessment, (651-602-1156)

The Update is in conformance with the *WRMPP* for local surface water management. Lilydale lies within the Lower Minnesota River and Lower Mississippi River watersheds. The Lower Minnesota River Watershed District’s watershed management plan was approved by the Board of Water and Soil Resources (BWSR) in 1999. The Lower Mississippi River Watershed Management Organization’s watershed plan was approved by BWSR in 2001.

Lilydale submitted its *Water Resources Management Plan (WRMP)* to the Council for review in 2007. The WRMP was reviewed and found to be consistent with Council policy and the Council’s *Water Resources Management Policy Plan*. The WRMP was adopted by the City in February 2008 and approved by the Watershed District in March 2008.

CONSISTENCY WITH COUNCIL POLICY

FORECASTS

Reviewer: Todd Graham, CD – Research, (651-602-1322)

The Update is consistent with regional policy for forecasts. To accommodate redevelopment, the City proposes forecasts that are higher than the Council’s figures (Table 1). The City proposes that forecasts be revised to 1,100 population and 650 households for years 2020 and 2030. Revision of the 2010-2020 growth forecast results in a revision to the City’s share of regional affordable housing need from zero to twenty-eight units. The Update acknowledges this affordable housing need. Council staff recommends that the Council accept the City’s preferred forecasts, as shown in Table 2.

Table 1: Metropolitan Council Forecasts

	2010	2020	2030
Population	930	930	930
Households	580	580	580
Employment	480	500	550

Table 2: City of Lilydale Forecasts

	2010	2020	2030
Population	930	1,100	1,100
Households	580	650	650
Employment	480	500	550

2030 REGIONAL DEVELOPMENT FRAMEWORK AND LAND USE

Reviewer: Denise Engen, CD – Local Planning Assistance, (651-602-1513)

Regional Development Framework

The Update is consistent with the *Regional Development Framework* (RDF) policies for developed communities. The RDF states that developed communities need to “accommodate growth forecasts through reinvestment at appropriate densities (5 units plus in developed areas and target higher density in locations with convenient access to transportation corridors and with adequate sewer capacity).”

Therefore, the City will be expected to meet densities of at least five units per acre through reinvestment, redevelopment, planning and zoning. Starting in 2010, the Council will monitor redevelopment to ensure the Council’s density policies for developed communities are being met, and to assess regional development and residential growth goals. Lilydale will be encouraged to participate by providing additional information on the City’s redevelopment activities. This program will be similar to the Council’s existing plat monitoring program.

Land Use and Density Analysis

The City has guided sufficient residential land, and at the appropriate densities, to accommodate the forecasts presented in the Update. Lilydale is a small city of approximately 570 acres; much of its acreage is water, parks or steep slopes. Parks/Open Space and Open Water take up nearly 449 gross acres (79%) of the city’s land area. The largest developed land use is *Multi-Family Residential* at 49.63 net acres (8.7%). Table 3, below, shows the City’s existing land use; existing land use is also mapped in Figure 3.

Table 3: City of Lilydale, Existing Land Uses in 2009

Land Use	Gross		Net *	
	Acres	Percent	Acres	Percent
Park/Open Space	269.33	47.40	155.03	27.20
Open Water	179.55	31.50	179.55	31.50
Multi-Family Residential	63.27	11.10	49.63	8.70
Right-of-Way	24.28	4.30	18.22	3.20
Commercial	26.55	4.70	19.31	3.40
Single Family Residential	3.47	0.60	2.48	0.40
Public	0.37	0.10	0.15	0.00
Wetland	--	--	34.72	6.10
Vacant	3.21	0.06	1.30	0.20
Steep Slopes (18%+)	--	--	109.66	19.20
Total	570.04	100.00	570.04	100.00

* Gross acres minus wetland and steep slopes (18%+)

Source: City of Lilydale, supplemental Information for Land Use, version received 1/4/10

The future land use map places all land in the City into one of eight land use categories, (Table 4 and Figure 4). The City is planning for modest changes to its existing land use pattern between 2008 and 2030. The most significant change involves guiding land into a new Mixed Use category (11.16 acres) and decreasing the amount of land guided as Commercial (-11.3 acres) (Figure 5).

Table 4: City of Lilydale, 2030 Future Land Use Table

Land Use	Gross		Net *	
	Acres	Percent	Acres	Percent
Park/Open Space	269.96	47.4	155.27	27.2
Open Water	179.55	31.5	179.55	31.5
Multi-Family Residential	63.27	11.1	49.63	8.7
Right-of-Way	24.28	4.3	18.22	3.2
Mixed-Use	17.12	3.0	11.16	2.0
Commercial	9.69	1.7	8.28	1.5
Single Family Residential	5.79	1.0	3.42	0.6
Public	0.37	0.1	0.15	0.0
Wetland	--	--	34.72	6.1
Steep Slopes (18%+)	--	--	109.66	19.2
Total	570.04	100.0	570.04	100.0

* Gross acres minus wetland and steep slopes (18%+)

Source: City of Lilydale, revised *Draft 2030 Comprehensive Plan Update*, received 12/23/09

As fully developed community, future growth in the City will occur mainly through redevelopment. The City prohibits development on slopes over 18% and, considering its environmental constraints (Figure 6), the City has limited options for redevelopment sites. The Update plans for infill and redevelopment along Highway 13 in two identified redevelopment areas, Riverfront Bluffs (the former Lilydale Tennis Club site) and Riverbluff Center Mall.

The Update forecasts growth from 580 to 650 households between 2010 and 2030. The Metropolitan Council estimates that that the City had 477 existing housing units in 2008. This will require growth of 173 additional households in order to meet the City's 2030 household forecast. Analysis of information provided in the Update indicates that 6.6 acres of land will be available for residential redevelopment.

As guided, the City's redevelopment areas could accommodate 66 to 264 new housing units, at a density range from 10 to 40 units per acre, (Table 5). This is sufficient to accommodate the 173 households needed to reach the City's 2030 household forecast, if development occurs above the middle of the density range. At 10 units per acre, the low end of the range is well above the minimum density of five units per acre needed to meet *RDF* policy.

Table 5: City of Lilydale, Redevelopment/Infill Areas

2008-2030 Property / Parcel	Future Land Use	Properties Identified for Redevelopment/Infill						Minimum Development Scenario	Maximum Development Scenario
		Density Range		Gross Acres	Percent		Net Acres		
		Min	Max		Residential	Net Acres			
One Riverfront View/Tennis Club	Mixed Use	10	40	6.00	60%	3.60	36.00	144.00	
Riverbluff Center Mall	Mixed Use	10	40	5.00	60%	3.00	30.00	120.00	
TOTALS				11.00		6.60	66.00	264.00	
				Infill Areas Density (units/acre)			10.00	40.00	

Sources: Metropolitan Council and City of Lilydale Draft 2030 Comprehensive Plan, version received 12/23/09

HOUSING

Reviewer: Linda Milashius, CD – Livable Communities, (651-602-1541)

The Update fulfills the housing requirements of the Metropolitan Land Planning Act. The Update acknowledges the City's share of the region's affordable housing need for 2011-2020, which is 28 units. The Update states that the City is nearly fully developed, so opportunities to meet that need will be addressed primarily through redevelopment efforts. The Update indicates that approximately 6.6 net acres of land (guided within the mixed-use land use category) will be available for high-density residential development, at 10-40 units per acre. The Update provides the implementation tools and programs the City will use to promote opportunities to address its share of the region's housing need. The City will continue to collaborate with the Dakota County Community Development Agency (CDA), which offers a number of services to assist in the creation and preservation of affordable housing. The CDA partners with local communities to develop and manage housing choices for seniors, low-and moderate-income families and minorities. The City will also maintain a cooperative, ongoing relationship with St. Paul, Mendota Heights and West St. Paul to address mutual housing issues.

INDIVIDUAL SEWAGE TREATMENT SYSTEMS (ISTS) PROGRAM

Reviewer: Jim Larsen, CD – Local Planning Assistance, (651-602-1159)

The Update is consistent with the *Water Resources Management Policy Plan* for ISTS. It indicates that there is one ISTS remaining in operation, serving a commercial business in the community. The City requires annual inspections of the system, and maintains all maintenance management records for the system, consistent with MPCA rules. All new development in the community is required to connect to the sanitary sewer system.

WATER SUPPLY

Reviewer: Sara Bertelsen Smith, ES – Water Supply Planning, (651-602-1035)

The Update is consistent with the *WRMPP* for water supply. The St. Paul Regional Water Service provides water to residents in Lilydale on a retail basis. The City is also served by private wells. As Lilydale does not own or operate a water supply system, it is not required to complete a water supply plan.

RESOURCE PROTECTION

Historic Preservation

Reviewer: Denise Engen, CD – Local Planning Assistance, (651-602-1513)

The Update contains a section on Historic Preservation as required by the MLPA.

Mississippi River Critical Area Review

Reviewer: Tori Dupre, CD – Local Planning Assistance (651-602-1621)

The 570-acre City is located entirely within the Mississippi River Critical Area, where both state Critical Area act requirements (Executive Order 79-19) and federal Mississippi National River and Recreation Area (MNRRA) standards apply. The Update acknowledges river corridor's *Urban Open Space* District and supports the Critical Area goals.

The Metropolitan Council finds the City's 2030 Critical Area plan policies and goals consistent with Executive Order 79-19. In past actions, the Council reviewed the City's 2000 Mississippi River Critical Area Plan on September 11, 1997 (review 16535-1), finding the plan consistent with Executive Order 79-19 requirements and the federal

Mississippi National River and Recreation Area (MNRRA) guidelines. The Council reviewed critical area plan amendments in 2006 and 2007 (reviews 16535-3, 16535-5) and an ordinance amendment in 2007 (review 16535-4). Following these reviews, the Council forwarded the review findings and recommendations to the MN Department of Natural Resources (DNR), which has final approval authority, and to the National Park Service (NPS). The Council will forward the review findings for the City's 2030 Update to the DNR for formal action and to the NPS for its records.

Solar Access Protection

Reviewer: Denise Engen, CD – Local Planning Assistance, (651-602-1513)

The Update contains a section on Solar Access Protection as required by the MLPA.

Aggregate Resources Protection

Reviewer: Jim Larsen, CD – Local Planning Assistance, (651-602-1159)

The Update contains a section on Aggregate Resource Protection as required by the MLPA. The Update indicates that there are no aggregate resources in the City. *Minnesota Geological Survey Information Circular 46* concurs with the City's determination.

PLAN IMPLEMENTATION

Reviewer: Denise Engen, CD – Local Planning Assistance, (651-602-1513)

The Update includes a description of:

- Capital Improvement Program Yes
- Zoning Code Yes
- Subdivision Code Yes
- ISTS Codes Yes
- Housing Implementation Program Yes

The Update contains an implementation chapter as required by the MLPA. The chapter summarizes the City's official controls and discusses a schedule for enacting measures to implement the Update. It also provides a zoning map and a brief explanation of the City's zoning and subdivision codes, as well as a Capital Improvement Plan/Budget.

COMPATIBILITY WITH PLANS OF ADJACENT GOVERNMENTAL UNITS AND PLANS OF AFFECTED SPECIAL DISTRICTS AND SCHOOL DISTRICTS

The City submitted the 2030 Comprehensive Plan Update to adjacent local units of government, school districts, counties and special districts for comment on October 30, 2008. No compatibility issues with plans of adjacent governmental units and plans of affected special districts and school districts were identified.

DOCUMENTS SUBMITTED FOR REVIEW:

- Transmittal form and City of Lilydale, *Draft 2030 Comprehensive Plan Update*, May 11, 2009 version, received May 15, 2009.
- Correspondence and revised *Draft 2030 Comprehensive Plan Update*, received December 23, 2009.
- Supplemental information for Land Use, received January 4, 2010.
- Supplemental information for Aviation, received January 25, 2010.

ATTACHMENTS

- Figure 1: Location Map Showing Regional Systems
- Figure 2: 2030 Regional Development Framework Planning Areas
- Figure 3: Existing Land Use, 2009
- Figure 4: 2030 Future Land Use Plan
- Figure 5: City of Lilydale, Land Use Table in 5-Year Stages
- Figure 6: City of Lilydale, Environmental Features

Figure 1. Location Map Showing Regional Systems
Lilydale

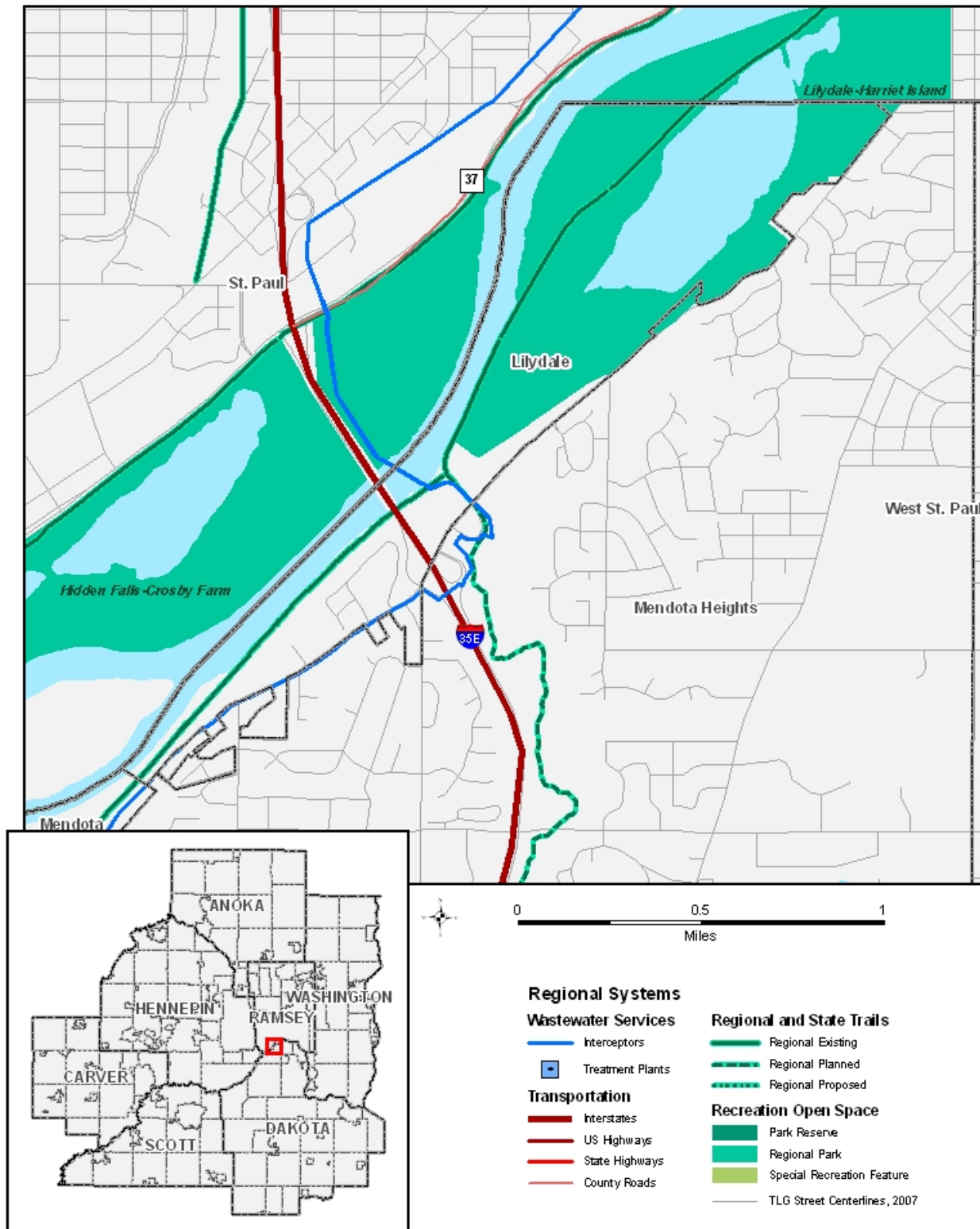


Figure 2. 2030 Regional Development Framework Planning Areas

Lilydale

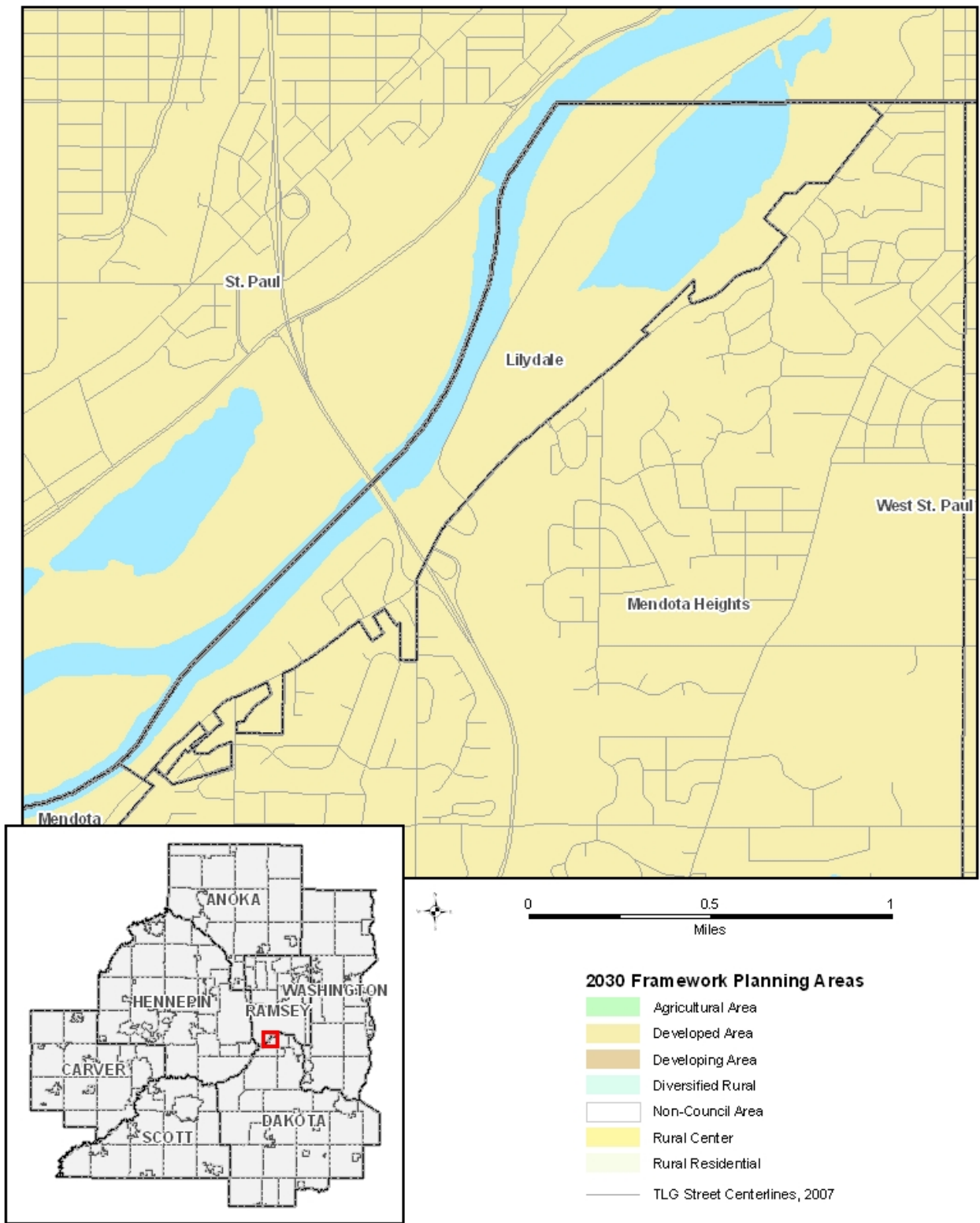


Figure 3. Existing Land Use, 2008
 City of Lilydale

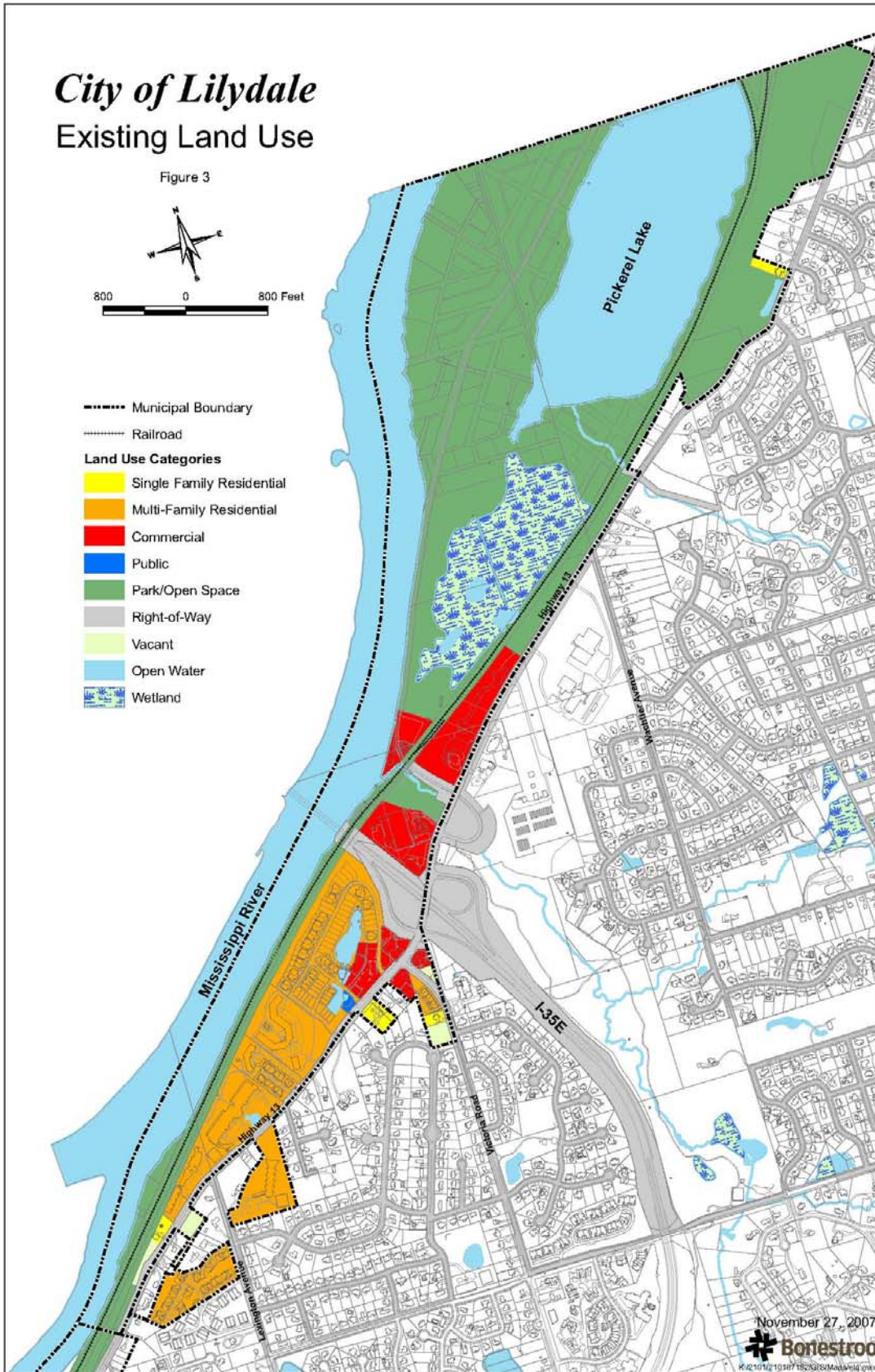


Figure 4. 2030 Future Land Use
 City of Lilydale

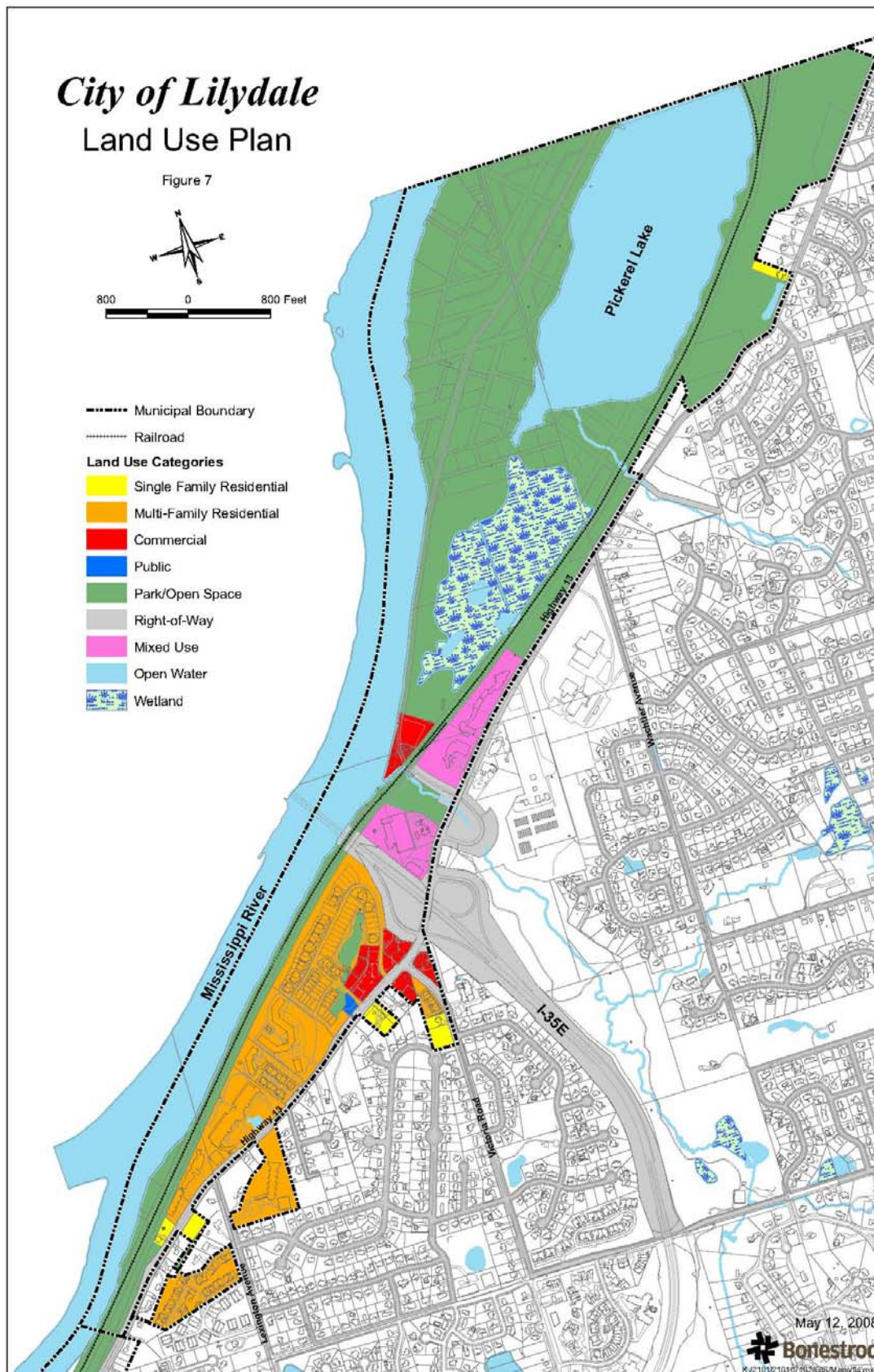


Figure 5: City of Lilydale, Land Use Table in 5-Year Stages

Within Urban Service Area	Allowed Density Range		Existing (2008)	2010	2015	2020	2025	2030	Change 2000-2030
	Housing Units/Acre Minimum	Maximum							
Residential Land Uses									
Single Family Residential	1	3	2.48	3.42	3.42	3.42	3.42	3.42	0.94
Multi-Family Residential	4	40	49.63	49.63	49.63	49.63	49.63	49.63	0
Mixed Use Primarily Residential*	10	40	0	3.348	3.348	6.69	6.69	6.69	6.69
C/I Land Uses		Est. Employees/Acre							
Commercial		10 to 40 emp/ac	19.31	13.73	13.73	8.28	8.28	8.28	-11.03
Mixed Use Primarily C/I*		10 to 40 emp/ac	0	2.232	2.232	4.46	4.46	4.464	4.46
Public/Semi Public Land Uses									
Public			0.15	0.15	0.15	0.15	0.15	0.15	0
Parks/Open Space			155.03	155.27	155.27	155.27	155.27	155.27	0.24
Roadway Rights of Way			18.22	18.22	18.22	18.22	18.22	18.22	0
Subtotal Sewered			244.82	246	246	246.12	246.12	246.124	1.304
Undeveloped									
Vacant			1.3	0.12	0.12	0	0	0	-1.3
Steep Slopes			109.66	109.66	109.66	109.66	109.66	109.66	0
Wetlands	--	--	34.72	34.72	34.72	34.72	34.72	34.72	0
Open Water, Rivers and Streams	--	--	179.55	179.55	179.55	179.55	179.55	179.55	0
Total			570.05	570.05	570.05	570.05	570.05	570.05	570.05

* The mixed use category assumes a 60/40 mix of residential/commercial uses at a density of 10 - 40 units per acre

Figure 6. Environmental Features
 City of Lilydale

