

March 6, 2026

Esteemed Chairs Rahman and Kavros Degraw,  
Members of the Planning and Development Committee:

The Western Connecticut Council of Governments (WestCOG) appreciates the opportunity to comment in **opposition** to Raised Bill 5502, *An Act Concerning Housing Development on Certain Lots Zoned for Industrial or Previously Zoned for Residential Use*. Connecticut faces important policy challenges simultaneously: expanding housing supply while preserving the land needed to support the state's economy. These objectives are both important, but they require balance. Bill 5502 risks undermining one of these goals in pursuit of the other.

## I. THE BILL TARGETS THE INDUSTRIAL LAND THAT IS MOST IMPORTANT TO CONNECTICUT'S ECONOMY

The proposal requires municipalities to allow residential or mixed-use development on industrially zoned parcels located within one thousand feet of a transit station or certain highways. In practice, these are the locations where industrial uses intentionally concentrate. Industrial districts near highways and rail corridors form a critical part of the state's freight and goods movement network. These areas support manufacturing, warehousing, distribution, and logistics operations that rely on direct access to transportation infrastructure.

As a result, the bill would disproportionately affect the most strategically located industrial land in the state—parcels located near highway interchanges, rail corridors, and freight facilities. Introducing residential uses into these areas risks creating conflicts with truck traffic, loading operations, noise, and other normal industrial activities.

## II. CONNECTICUT HAS A LIMITED SUPPLY OF INDUSTRIAL LAND, AND DEMAND FOR IT IS INCREASING

Connecticut is a small and highly developed state with relatively little land suitable for modern industrial uses. Large sites located near major transportation infrastructure are rare. This scarcity is one reason why Connecticut has not experienced the large-scale warehouse and logistics development seen in states such as Pennsylvania, where extensive land near highway corridors is available for industrial use.

The limited supply of industrial land that exists in Connecticut is therefore particularly valuable. Policies that encourage encroachment into these areas risk shrinking an already constrained supply. At the same time, demand for industrial sites has been increasing due to trends such as e-commerce distribution, logistics expansion, and the onshoring of manufacturing activity. Connecticut has also made significant efforts to expand advanced manufacturing and attract emerging industries such as data centers. These facilities require large parcels, access to significant electrical infrastructure, and proximity to transportation corridors—precisely the types of locations typically found in industrial zones. Encouraging non-industrial development in these same areas conflicts with these economic development objectives.

### **III. INDUSTRIAL LAND SUPPORTS ECONOMIC OPPORTUNITY FOR RESIDENTS**

Industrial businesses provide a wide range of well-paying jobs that do not require a four-year college degree, including positions in manufacturing, equipment operation, maintenance, distribution, and skilled trades. Even in an educated state such as Connecticut, most residents do not hold four-year degrees. These businesses provide critical pathways to stable employment and upward mobility. At a time when many sectors of the economy are experiencing wage stagnation and growing income inequality, industrial jobs remain a source of middle-class wages. Protecting the limited land that supports these industries is not only an economic development issue, but also an issue of economic opportunity for Connecticut residents.

### **IV. LOSS OF INDUSTRIAL LAND IS EFFECTIVELY IRREVERSIBLE**

Industrial land is rarely removed through a single policy decision. Instead, it is gradually converted as other uses are introduced into industrial districts and begin to constrain existing operations. Housing in particular creates expectations for quiet, traffic control, and environmental conditions that are often incompatible with normal industrial activities. Over time, these pressures can erode the viability of industrial areas and lead to the displacement of employment uses.

Once strategically located industrial land has been converted to residential use, it is extremely difficult—if not impossible—to recreate it elsewhere. Industrial land near highway interchanges and rail corridors functions as part of the state’s economic infrastructure.

### **V. HOUSING NEXT TO HIGHWAYS MAY CONFLICT WITH PLANNING OBJECTIVES**

The bill specifically targets parcels within one thousand feet of major highways. Planning practice generally seeks to buffer residential uses from major freight corridors and limited-access highways because of noise, emissions, and heavy truck traffic. Encouraging residential development along these facilities may create new environmental and quality-of-life concerns and runs counter to long-standing planning principles regarding land use compatibility.

### **VI. THE BILL RELIES ON A DEFINITION DERIVED FROM A JUNKYARD CONTROL STATUTE**

The bill applies to parcels within one thousand feet of a “highway,” defined by reference to section 13a-123c. That statute was originally enacted to regulate junkyards and scrap processing facilities and defines highway in terms of the federal interstate system, the federal primary system, and limited-access state highways.

The federal primary system referenced in that statute was eliminated by federal law more than thirty years ago. Continued reliance on this outdated classification introduces ambiguity and may create uncertainty when determining which parcels are subject to the requirement.

### **VII. THE BILL INTRODUCES A NEW STANDARD BASED ON HISTORICAL ZONING**

The proposal also requires municipalities to allow housing on parcels that were “previously zoned for residential use at any time.” Many municipalities do not maintain readily accessible historical zoning records extending back decades, and zoning maps have frequently changed over time. Determining whether a parcel was once zoned residential could therefore require extensive historical research and may lead to uncertainty during the development review process.

Land use regulation is typically based on current zoning classifications rather than historical ones. Introducing a requirement tied to prior zoning status creates a new and potentially difficult administrative burden.

**VIII. CONCLUSION**

WestCOG supports thoughtful policies that expand housing supply while preserving the integrity of municipal planning frameworks and protecting critical economic land uses. Housing expansion should focus on areas where housing is compatible with surrounding uses—not on the limited land needed to support Connecticut’s industrial economy and the jobs and economic opportunities that depend on it. For these reasons, WestCOG respectfully urges your Committee to not to advance Raised Bill 5502.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Francis Pickering". The signature is written in a cursive style with a long horizontal stroke at the end.

Francis R. Pickering  
Executive Director