



Town of Hamden Planning and Zoning Department

Memorandum

To: Hamden Planning and Zoning Commission

From: Daniel W. Kops, Jr., Assistant Town Planner *DWK*

Re: Zoning Regulations Text Change Application 13-943
Proposed Amendment, adding 668.2.h. Institutional Master Plan, to Require
Colleges and Universities To Obtain Special Permit Approval Of Five-Year
Institutional Master Plans

cc: Leslie Creane, Town Planner

Date: November 18, 2014

Overview

As previously reported to the Commission, since 2005 the number of dwelling units with approved and active student housing permits has soared over 350% from 49 to 223, housing close to 900 students, not including most students living in multifamily apartments.¹ Some of the jump in permits is due to a concerted zoning enforcement effort, but much can be attributed to the imbalance between enrollment and on-campus housing. The recent growth of student rental housing in Hamden's residential neighborhoods has resulted in significant problems affecting the health, safety and welfare of Hamden residents, including noise, property maintenance and appearance, reduction in pervious surfaces, parking congestion, traffic, overcrowding and overall impact on quality of life.

In response, the Commission has taken two actions. First, last April it approved a one-year moratorium on new student housing permits. Second, it spent several months reviewing the possibility of requiring colleges and universities to submit Institutional Master Plans. In July the Commission endorsed draft language and requested that the Department submit it as a formal application to amend the Zoning Regulations. This is the amendment now before the Commission.

The proposed amendment would require colleges and universities to submit, as a Special Permit application, a five-year Institutional Master Plan (IMP) for approval by the Commission. The IMP is to include information on the institution's vision for the future, physical expansion plans, current and projected enrollment, student housing, housing policy, impact on the housing market, traffic impact, and impact on ridgelines. Each institution must provide annual updates on both enrollment and housing. Only after its IMP is approved may an institution seek Special Permit approval for specific projects that are consistent with the IMP. If priorities or needs change the IMP may be amended.

¹ Multifamily buildings, defined as four or more dwelling units, in which students occupy no more than 50% of the units, are exempt from the requirement of a student housing permit.

The amendment would apply to all colleges and universities wishing to come to Hamden or expand their existing facilities, with the exception of Southern Connecticut State University, which is exempt under the Connecticut General Statutes. However it's obvious to everyone that the impetus for the amendment is the recent growth of Quinnipiac University, which will therefore it will be the focus of the following commentary.

Department and Inter-Agency Reviews

In a memo dated September 22, 2014 the Town Engineer stated he had no comments.

The Fire Marshal indicated on September 18, 2014 that he had no comment.

In a memorandum dated September 15, 2014, QVHD provided comments regarding maximum occupancy, the minimum area required for air space and sleeping, bathroom facilities, food preparation and dining facilities. The comments are relevant when reviewing specific development applications but not the IMP amendment.

In a letter dated November 14, 2014 the Chairman of the Regional Planning Commission stated that the Commission had reviewed the application at its November 13th meeting and determined that it is not likely to cause any adverse impacts on other towns nor affect the habitat or ecosystem of Long Island Sound.

No additional comments have been received.

Planning and Zoning Department Comments

Colleges and universities in general are assets to a community and Quinnipiac University is no exception. It provides jobs, stimulates the local economy, offers lectures and concerts and hosts sports events. The vast majority of its students conduct themselves appropriately. Many volunteer to help citizens in Hamden by engaging in tutoring, cleanups and raising money for charities. And indeed, the proposed amendment is not intended to prevent academic institutions, including Quinnipiac University, from growing.

But there is a problem and it needs to be addressed. It began when Quinnipiac University expanded its enrollment far beyond its ability to house the additional students, which led to upperclassmen being forced to find housing off-campus. The York Hill dormitories were supposed to eliminate much of the need for off-campus housing, but the beneficial impact was attenuated in part by the fact that a substantial portion of the approved dorms have yet to be constructed and in large measure because the university continued to increase its enrollment, violating at the very least, its verbal commitment to the Commission when it approved the York Hill campus expansion.

In another community, with a different distribution of housing opportunities, such an expansion of off-campus living might not pose a problem. But Hamden does not have a "college town" area filled mostly with students, isolated from residential areas. This has led to the rental of homes in the residential areas, mostly to the north of Town Hall. College students, especially

undergraduates, live a lifestyle that is often not compatible with the non-student population, and this has created anger and frustration among many residents.

The proposed amendment will not immediately solve this problem. But it does oblige the university to provide a plan that over time will balance enrollment and university-run housing sufficiently to reduce the demand for rental housing in residential neighborhoods. It will provide both the Commission and the public with a clearer picture of what to expect in the future, eliminating the uncertainty that currently prevails and undermines relations with the university. And of course it provides the opportunity to comment on the submitted five-year plan. As proposed, it gives the Commission the authority to approve, attach conditions, amend or deny the plan.

As the Commission is aware, staff have met with representatives of Quinnipiac University to discuss a variety of issues, including the proposed amendment. They have consistently expressed the university's willingness to prepare and present a master plan but raised concerns regarding the proposed text and have requested modifications.

The least significant pertain to the deadline for providing enrollment and housing data to the Commission. The university annually submits enrollment data to the Integrated Postsecondary Education Data System (IPEDS), a series of interrelated surveys conducted annually by the U.S. Department's National Center for Education Statistics (NCES). The deadline for that submission is typically November 1st. In order to provide the same data to the Town and IPEDS, the university would like the language changed to reference the November 1st instead of September 15th deadline. The Department has no objections to this change and has drafted the appropriate language. Similarly, the Department is comfortable with the removal of the term "Short and longer term" in section C.vii., since the plan covers a five-year period. Nor does it object to changing "necessary" to "reasonably necessary" in sections C.xi and D.vi.

The university has also requested the elimination of Section E. iv., which requires a Traffic Study as part of the IMP. The university argues that it will need to provide a traffic study with any new application for a significant project so the proposed requirement is unnecessary. The Department also has no objection to removal of this clause, given the remaining requirements of Section E. All of the alternative language discussed above is highlighted in Attachment II.

There remains one final objection raised by the university – making the IMP require Special Permit approval. The university requests that language be changed so that the plan is "accepted" rather than "approved" by the Commission, while individual projects would still require Special Permit approval. It argues that requiring Special Permit approval of the IMP would be an inappropriate use of the Commission's authority, and has indicated it will file suit if the Commission adopts the amendment as proposed. It has also noted that Commissioners may be sued as individuals for abuse of their authority.

There is no question that making the IMP subject to approval under the Special Permit approval process is a novel approach. The Commission's legal counsel, Mr. Lee, will discuss both of these outcomes with the Commission this evening.

Undoubtedly all Commissioners are aware of the yet-to-be-signed Memorandum of Understanding between the Town and Quinnipiac University. The MOU calls for the university to contribute approximately 1.2 million dollars to the Town on an annual basis. However the

university has made it clear verbally that the agreement will not be signed if the IMP is subject to Special Permit approval.

Mayor Jackson has expressed to staff his strong reservations concerning the clause requiring Special Permit approval of the IMP because he feels it is unfair to single out one large entity and not others. But he also stated that the Planning and Zoning Commission should not consider the possible loss of the university's offer of 1.2 million dollars, which is a financial rather than a zoning issue.

It's important to examine what a change to "accept" rather than "approve" the IMP would mean. The changes to the text that would be required are shown in Attachment III. The Department's interpretation of the impact of these changes is as follows:

- An IMP would still be required prior to obtaining approval for any specific projects through the Special Permit process.
- The IMP would be available in the Department for inspection by the public and would also be posted on the Town website, for a sufficient amount of time prior to being formally presented to the Commission.
- The university's representatives would come before the Commission to present the IMP and address any questions raised by Commissioners.
- The public would have to the opportunity to comment at the meeting.
- The Commission would offer a written opinion on the plan. The opinion might include recommended changes, or might indicate a decision not to endorse the plan.
- The Commission is not obligated to accept the IMP if it does not include all of the required information.
- The university would be under no obligation to make changes, nor would it be prevented from filing Special Permit applications during the five year period covered by the plan if the IMP is not endorsed by the Commission. But the IMP review process would make the areas of concern very clear to both the university and the public.
- The Commission would continue to continue to evaluate all Special Permit applications for their impact on the health, safety and welfare of the surrounding community, including giving due consideration to any relevant issues raised during the review of the IMP.
- The fact that the Commission has reservations about any portions of the IMP would not prevent the university from filing Special Permit applications during the five-year period.

The Commission will need to confirm whether or not Quinnipiac University agrees with this interpretation of what the term "accept an IMP" entails.

As with all proposed amendments to the Zoning Regulations, the Commission must determine if the proposed amendment is consistent with the current Plan of Conservation and Development (POCD).² Since it is intended to enhance the Commission's ability to protect the health, safety and welfare of the residential neighborhoods as well as the public in general, the Department believes it is quite consistent with the goals of the POCD.³

² The Town of Hamden, "Plan of Conservation and Development 2004," revised 2009.

³ See Goal #9 in the 2004 POCD: "Support and foster programs that maintain the housing stock and enhance and preserve the fabric of existing neighborhoods."

Recommendation

The Planning and Zoning Department believes that the requirement of an IMP will be a useful tool for both institutions of higher learning and the Commission, guiding appropriate university growth in the future. It therefore recommends approval of proposed amendment of the Zoning Regulations 14-943, with the changes proposed in Attachment II. In addition, it has no objections to the changes proposed in Attachment III, provided that the term "accept" describes a process substantially in agreement with the interpretation noted above. However, given the magnitude of these changes, the Department believes that if the Commission chooses to adopt them, the Public Hearing should be left open until the January 13, 2015 meeting to allow the public ample time to review the revised text.

If approved the amendment should have an effective date of December 9, 2014.

The Commission should state the reason for its approval of the amendment and find that it is consistent with the POCD.

DWK:tbm

Attachments:

Attachment I:	Text Change Application 13-943
Attachment II:	Requested Modifications Not Including Changing "Approve" to "Accept"
Attachment III:	Requested Modifications Changing "Approve" to "Accept"

ATTACHMENT I
Proposed Amendment To The Zoning Regulations
To Require Colleges And Universities To Obtain Special Permit Approval Of
Five-Year Institutional Master Plans

Add subsection 668.2.h. Institutional Master Plan

Any college or university shall be permitted in the zones and in the manner specified in Table 6.1, provided that a five-year Institutional Master Plan (IMP) approved by the Commission is in effect. The IMP is subject to the following provisions:

1. It requires Special Permit approval.
2. The IMP shall include such items as:
 - A) A Statement of Institutional Aims and Objectives and an explanation of how the IMP advances the aims and objectives of the educational institution.
 - B) Map(s) and descriptions of land, buildings and other structures or facilities owned or occupied by the Institution, including footprints, gross floor areas, heights, utilities, walks, open space, parking areas and number of parking spaces.
 - C) Current and projected institutional needs for academic programs, research activities, offices and housing, explaining how they are related to the Institutional Aims and Objectives. In its discussion of housing needs the IMP shall include a detailed Student Housing Plan containing:
 - i. The number of full-time and part-time undergraduate (broken down by year) and graduate students attending the institution as of September 15th and projected to attend each year covered by the IMP.
 - ii. The number of full-time and part-time undergraduate and graduate students living as of September 15th in housing facilities owned or operated by the Institution, broken down by year (freshman, sophomore, junior, senior and graduate) type of housing (dormitory-apartment- other type of arrangement) and location.
 - iii. The number of full-time and part-time undergraduate (broken down by year) and graduate students living as of September 15th off-campus in non-university-owned housing.
 - iv. The number and percentage of beds that are currently unoccupied, broken down by location and year of student the beds are designated for.
 - v. Any housing requirements or restrictions the Institution places on its students, such as eligibility for on-campus housing and requirements to live on-campus.
 - vi. The process by which the Institution directs its students to housing facilities.
 - vii. Short and longer-term plans for housing its students on and off-campus, broken down by year (freshman, sophomore, junior, senior and graduate) and type of housing (dormitory-apartment- other type of arrangement).
 - viii. Impacts of the Institution's housing demand on housing supply and rental market rates in the neighborhoods adjacent to the campus and where its students are concentrated.
 - ix. A plan for mitigating the impacts of student housing demand on surrounding neighborhoods.
 - x. A plan to address off-campus student behavioral issues that are incompatible with the surrounding neighborhoods.
 - xi. Any other information deemed necessary by the Commission for its evaluation of the proposed development program.
 - D) Description of proposed future projects, including:

- i. Site locations and approximate building/facility footprints.
 - ii. Uses of each land area, building or structure (classroom, laboratory, office, and parking).
 - iii. Gross floor area to be added.
 - iv. Gross floor area to be eliminated through demolition.
 - v. Parking to be added, moved or removed.
 - vi. Any other information deemed necessary by the Commission for its evaluation of the proposed development program.
 - E) Transportation and Parking Management Mitigation Plan describing:
 - i. Parking to be provided during the years covered by the plan, broken down by groups eligible to use each lot or facility.
 - ii. Policies regarding on-campus parking.
 - iii. Transportation services provided by the Institution.
 - iv. A traffic study indicating the likely traffic impacts of the proposed projects.
 - v. Transportation objectives and mitigation measures intended to address these impacts.
 - F) A statement of guidelines and objectives for a pedestrian circulation system, including access to active and passive open space.
 - G) A statement of guidelines and objectives for new and renovated buildings to assure their compatibility with surrounding neighborhoods, minimize potential adverse impacts on historic structures and protect ridge lines and steep slopes.
 - H) Other information required as part of Special Permit applications. The Commission may waive any of these items if it feels they are not necessary for the proper evaluation of the application.
3. The Commission may attach reasonable conditions of approval.
 4. The IMP may be amended at any time through a Major Amendment to the approved IMP.
 5. The IMP approval shall expire five years from the date of its original approval by the Commission. Prior to that date a new five-year IMP must be submitted for approval by the Commission.
 6. Institutions with an approved IMP are required to provide to the Commission an annual report detailing compliance with their plans by each anniversary of the approval.
 7. Institutions with an approved IMP are required to provide student enrollment and housing data current as of September 15th to the Commission by October 1st of each year, including:
 - i. The number of full-time and part-time undergraduate (broken down by year) and graduate students registered at the institution.
 - ii. The number of full-time and part-time undergraduate and graduate students currently living in housing facilities owned or operated by the Institution, broken down by year (freshman, sophomore, junior, senior and graduate) type of housing (dormitory- apartment- other type of arrangement) and location.
 - iii. The number of full-time and part-time undergraduate (broken down by year) and graduate students currently living off-campus in non-university-owned housing.
 - iv. The number and percentage of beds in housing facilities owned or operated by the Institution, that are currently unoccupied, broken down by location and year of the students the beds are designated for.
 8. Once a five-year plan has been approved, applications for specific building(s), facilities, infrastructure and related items shall also require Special Permit approval or approval of an amendment to an existing Special Permit, as appropriate. No application for specific building(s), facilities, infrastructure and related items shall be approved unless the Commission finds it consistent with the IMP in effect at the time of submission.

ATTACHMENT II
Proposed Amendment To The Zoning Regulations
To Require Colleges And Universities To Obtain Special Permit Approval Of
Five-Year Institutional Master Plans

Requested Modifications, Not Including Changing “Approve” To “Accept”

Add subsection 668.2.h. Institutional Master Plan

Any college or university shall be permitted in the zones and in the manner specified in Table 6.1, provided that a five-year Institutional Master Plan (IMP) approved by the Commission is in effect. The IMP is subject to the following provisions:

1. It requires Special Permit approval.
2. The IMP shall include such items as:
 - A) A Statement of Institutional Aims and Objectives and an explanation of how the IMP advances the aims and objectives of the educational institution.
 - B) Map(s) and descriptions of land, buildings and other structures or facilities owned or occupied by the Institution, including footprints, gross floor areas, heights, utilities, walks, open space, parking areas and number of parking spaces.
 - C) Current and projected institutional needs for academic programs, research activities, offices and housing, explaining how they are related to the Institutional Aims and Objectives. In its discussion of housing needs the IMP shall include a detailed Student Housing Plan containing:
 - i. The number of full-time and part-time undergraduate (broken down by year) and graduate students attending the institution in the Fall as submitted to the IPEDS on November 1st, as of September 15th and projected to attend each year covered by the IMP.
 - ii. The number of full-time and part-time undergraduate and graduate students living as of September 15th November 1st in housing facilities owned or operated by the Institution, broken down by year (freshman, sophomore, junior, senior and graduate) type of housing (dormitory-apartment- other type of arrangement) and location.
 - iii. The number of full-time and part-time undergraduate (broken down by year) and graduate students living as of September 15th November 1st off-campus in non-university-owned housing.
 - iv. The number and percentage of beds that are currently unoccupied, broken down by location and year of student the beds are designated for.
 - v. Any housing requirements or restrictions the Institution places on its students, such as eligibility for on-campus housing and requirements to live on-campus.
 - vi. The process by which the Institution directs its students to housing facilities.
 - vii. Short and longer term plans for housing its students on and off-campus, broken down by year (freshman, sophomore, junior, senior and graduate) and type of housing (dormitory-apartment- other type of arrangement).
 - viii. Impacts of the Institution's housing demand on housing supply and rental market rates in the neighborhoods adjacent to the campus and where its students are concentrated.
 - ix. A plan for mitigating the impacts of student housing demand on surrounding neighborhoods.
 - x. A policy plan to address off-campus student behavioral issues that are incompatible with the surrounding neighborhoods.

Formatted: Superscript

- xi. Any other information deemed reasonably necessary by the Commission for its evaluation of the proposed development program.
- D) Description of proposed future projects, including:
- i. Site locations and approximate building/facility footprints.
 - ii. Uses of each land area, building or structure (classroom, laboratory, office, and parking).
 - iii. Gross floor area to be added.
 - iv. Gross floor area to be eliminated through demolition.
 - v. Parking to be added, moved or removed.
 - vi. Any other information deemed reasonably necessary by the Commission for its evaluation of the proposed development program.
- E) Transportation and Parking Management Mitigation Plan describing:
- i. Parking to be provided during the years covered by the plan, broken down by groups eligible to use each lot or facility.
 - ii. Policies regarding on-campus parking.
 - iii. Transportation services provided by the Institution.
 - ~~iv. A traffic study indicating the likely traffic impacts of the proposed projects.~~
 - v.iv. Transportation objectives and mitigation measures intended to address these impacts.
- F) A statement of guidelines and objectives for a pedestrian circulation system, including access to active and passive open space.
- G) A statement of guidelines and objectives for new and renovated buildings to assure their compatibility with surrounding neighborhoods, minimize potential adverse impacts on historic structures and protect ridge lines and steep slopes.
- H) Other information required as part of Special Permit applications. The Commission may waive any of these items if it feels they are not necessary for the proper evaluation of the application.
3. The Commission may attach reasonable conditions of approval.
 4. The IMP may be amended at any time through a Major Amendment to the approved IMP.
 5. The IMP approval shall expire five years from the date of its original approval by the Commission. Prior to that date a new five-year IMP must be submitted for approval by the Commission.
 6. Institutions with an approved IMP are required to provide to the Commission an annual report detailing compliance with their plans by each anniversary of the approval.
 7. Institutions with an approved IMP are required to provide student Fall enrollment data as submitted to the IPEDS and housing data ~~current as of September 15th~~ to the Commission by ~~October~~ November 1st of each year, including:
 - i. The number of full-time and part-time undergraduate (broken down by year) and graduate students registered at the institution.
 - ii. The number of full-time and part-time undergraduate and graduate students currently living in housing facilities owned or operated by the Institution, broken down by year (freshman, sophomore, junior, senior and graduate) type of housing (dormitory- apartment- other type of arrangement) and location.
 - iii. The number of full-time and part-time undergraduate (broken down by year) and graduate students currently living off-campus in non-university-owned housing.
 - iv. The number and percentage of beds in housing facilities owned or operated by the Institution, that are currently unoccupied, broken down by location and year of the students the beds are designated for.
 8. Once a five-year plan has been approved, applications for specific building(s), facilities, infrastructure and related items shall also require Special Permit approval or approval of an amendment to an existing Special Permit, as appropriate. No application for specific

building(s), facilities, infrastructure and related items shall be approved unless the Commission finds it consistent with the IMP in effect at the time of submission.

ATTACHMENT III
Proposed Amendment To The Zoning Regulations
To Require Colleges And Universities To Obtain Special Permit Approval Of
Five-Year Institutional Master Plans

Requested Modifications Changing “Approve” to “Accept”

Add subsection 668.2.h. Institutional Master Plan

Any college or university shall be permitted in the zones and in the manner specified in Table 6.1, provided that a five-year Institutional Master Plan (IMP) ~~approved~~ **accepted** by the Commission is in effect. The IMP is subject to the following provisions:

~~1. It requires Special Permit approval.~~

~~2.1.~~ The IMP shall include such items as:

- A) A Statement of Institutional Aims and Objectives and an explanation of how the IMP advances the aims and objectives of the educational institution.
- B) Map(s) and descriptions of land, buildings and other structures or facilities owned or occupied by the Institution, including footprints, gross floor areas, heights, utilities, walks, open space, parking areas and number of parking spaces.
- C) Current and projected institutional needs for academic programs, research activities, offices and housing, explaining how they are related to the Institutional Aims and Objectives. In its discussion of housing needs the IMP shall include a detailed Student Housing Plan containing:
 - i. The number of full-time and part-time undergraduate (broken down by year) and graduate students attending the institution as of September 15th and projected to attend each year covered by the IMP.
 - ii. The number of full-time and part-time undergraduate and graduate students living as of September 15th in housing facilities owned or operated by the Institution, broken down by year (freshman, sophomore, junior, senior and graduate) type of housing (dormitory-apartment- other type of arrangement) and location.
 - iii. The number of full-time and part-time undergraduate (broken down by year) and graduate students living as of September 15th off-campus in non-university-owned housing.
 - iv. The number and percentage of beds that are currently unoccupied, broken down by location and year of student the beds are designated for.
 - v. Any housing requirements or restrictions the Institution places on its students, such as eligibility for on-campus housing and requirements to live on-campus.
 - vi. The process by which the Institution directs its students to housing facilities.
 - vii. Short and longer-term plans for housing its students on and off-campus, broken down by year (freshman, sophomore, junior, senior and graduate) and type of housing (dormitory-apartment- other type of arrangement).
 - viii. Impacts of the Institution's housing demand on housing supply and rental market rates in the neighborhoods adjacent to the campus and where its students are concentrated.
 - ix. A plan for mitigating the impacts of student housing demand on surrounding neighborhoods.
 - x. A plan to address off-campus student behavioral issues that are incompatible with the surrounding neighborhoods.
 - xi. Any other information deemed necessary by the Commission for its evaluation

of the proposed development program.

- D) Description of proposed future projects, including:
- i. Site locations and approximate building/facility footprints.
 - ii. Uses of each land area, building or structure (classroom, laboratory, office, and parking).
 - iii. Gross floor area to be added.
 - iv. Gross floor area to be eliminated through demolition.
 - v. Parking to be added, moved or removed.
 - vi. Any other information deemed necessary by the Commission for its evaluation of the proposed development program.
- E) Transportation and Parking Management Mitigation Plan describing:
- i. Parking to be provided during the years covered by the plan, broken down by groups eligible to use each lot or facility.
 - ii. Policies regarding on-campus parking.
 - iii. Transportation services provided by the Institution.
 - iv. A traffic study indicating the likely traffic impacts of the proposed projects.
 - v. Transportation objectives and mitigation measures intended to address these impacts.
- F) A statement of guidelines and objectives for a pedestrian circulation system, including access to active and passive open space.
- G) A statement of guidelines and objectives for new and renovated buildings to assure their compatibility with surrounding neighborhoods, minimize potential adverse impacts on historic structures and protect ridge lines and steep slopes.
- H) Other information required as part of Special Permit applications. The Commission may waive any of these items if it feels they are not necessary for the proper evaluation of the application.

~~3.2. The Commission may attach reasonable conditions of approval. The Commission will offer a written opinion on the plan, including recommended changes. It may also choose not to endorse the IMP.~~

~~4.3. The IMP may be amended at any time through a Major Amendment to the approved IMP the same process as the original IMP.~~

~~5. The IMP approval shall expire five years from the date of its original approval by the Commission. Prior to that date a new five-year IMP must be submitted for approval by the Commission. A new IMP must be filed for acceptance five years from the date of the original acceptance by the Commission.~~

~~6.4. Institutions with an approved-accepted IMP are required to provide to the Commission an annual report detailing compliance with their plans by each anniversary of the approval-acceptance.~~

~~7.5. Institutions with an approved-accepted IMP are required to provide student enrollment and housing data current as of September 15th to the Commission by October 1st of each year, including:~~

- i. The number of full-time and part-time undergraduate (broken down by year) and graduate students registered at the institution.
- ii. The number of full-time and part-time undergraduate and graduate students currently living in housing facilities owned or operated by the Institution, broken down by year (freshman, sophomore, junior, senior and graduate) type of housing (dormitory- apartment- other type of arrangement) and location.
- iii. The number of full-time and part-time undergraduate (broken down by year) and graduate students currently living off-campus in non-university-owned housing.
- iv. The number and percentage of beds in housing facilities owned or operated by the Institution, that are currently unoccupied, broken down by location and year of the

students the beds are designated for.

§.6. Once a five-year plan has been approved~~accepted~~, applications for specific building(s), facilities, infrastructure and related items shall also require Special Permit approval or approval of an amendment to an existing Special Permit, as appropriate. ~~No application for specific building(s), facilities, infrastructure and related items shall be approved unless the Commission finds it consistent with the IMP in effect at the time of submission.~~