



New Castle County Department of Land Use

September 2, 2026

David Edgell, AICP
Director
Delaware Office of State Planning Coordination
122 Martin Luther King Jr. Blvd. South
Dover, DE 19901

Mr. Edgell,

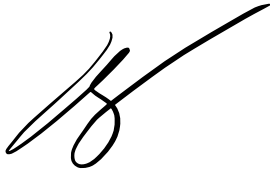
I am writing about the proposed comprehensive plan update for the Town of Townsend, to officially share New Castle County Department of Land Use's review.

The Department of Land Use has reviewed the Town's update to their comprehensive plan. In reviewing the plan and proposed Annexation Area, The Department of Land Use offers the following comments for consideration:

1. Consistent with the August 19, 2026 review letter and previous communications to the Town of Townsend the County has concerns regarding the data used for the update, specifically with respect to the date of the data used. This includes:
 - a. Page 10 – Table 2 should be updated to 2024 Delaware Population Consortium Data. A table labeled Delaware Population Consortium Data for New Castle County and Townsend should not include data that is not based on that data source. If the intent is to estimate occupants per household it should be in the text in the paragraph below the table.
 - b. Page 12 – Table 3 should be updated with 2020 Census or 2024 ACS data, and the 2024 DPC data
 - c. Page 13 – Table 5 Should be updated to 2020 Census Data
 - d. Page 14 – Table 6 should be updated with 2024 ACS data. Table 7 should be updated with 2020 Census or 2024 ACS data.
 - e. Page 16 – Figure 2 should be updated to 2020 Census data (hopefully the same homes are not still vacant after 16 years)

- f. Page 17 - Figure 3 should be updated to 2020 Census data. Table 10 should be updated with 2024 ACS data.
 - g. Page 18 – Figure 4 should be updated with 2024 ACS data.
 - h. Page 19 – Table 11 should be updated with 2024 ACS data.
 - i. Page 20 – Table 12 & 13 should be updated with 2024 ACS data.
- 2. The General Manager for the Department of Land Use need to be updated to David M. Culver.
- 3. Consistent with DNREC’s comments, echoed in previous conversations with Town, The Department is concerned about the quantity of Critical Natural Areas, Water Resource Protection Areas (Recharge Areas), Wetlands, and Floodplains. The Town, as part of their sewer agreement with the County, has adopted resource protections standards consistent with those in effect in the Unified Development Code in the New Castle County Code in 2002. Since that time there have been significant enhancements to environmental protection standards. Should the Town incorporate the current environmental protection standards in the UDC, the County’s concerns would be assuaged.
- 4. The Town identified several parcels on the northeast side of Route 71 and south of Woods at Hidden Creek that are encumbered by Wetlands and Flood Plains, which under the current Town provisions would have little developable land, however, are designated for residential purposes.
- 5. The Town intends to annex only a portion of parcel 14-016.00-107 which is currently owned by the State of Delaware, leaving a portion within the unincorporated area of New Castle County.
- 6. The Town intends to annex parcel 14-015.00-245, which the intended land use is Institutional/Community. This property is protected in perpetuity under a Department of Agricultural Land Preservation Foundation easement, and as such will not be able to be developed.
- 7. The Town intends to increase its size by roughly 100%, yet has not demonstrated projections from the Delaware Population Consortium meriting that increase.
- 8. Much of the land proposed for annexation is in the Level 4 and out of play areas in the State Strategies Map and state policies do not currently support development.

If you have any questions, feel free to contact the New Castle County Department of Land Use.

A handwritten signature in black ink, appearing to be 'MR', with a long, sweeping horizontal stroke extending to the right.

Matthew Rogers

Planner III

New Castle County Dept. of Land Use

CC: Scott Lobdell, Mayor

Troy Geiger, Chairman of the Planning Commission

Julie Goodyear, Town Manager

Samantha Bulkilvish, OSPC