

**Town of Coventry, Rhode Island, Planning Board
'Village at Tiogue' 162 Residential Unit Development**

**Comprehensive Permit (Affordable Housing)
and
Major Land Development Project Application**

**Tiogue Avenue (RI Route 3) and Tiffany Road
Tax Assessor's Plat 32 - Lot(s) 149, 150, 151, and 153**



Prepared for: 232 Realty Associates

Prepared By: Pimentel Consulting, Inc.

13 January 2026

INTRODUCTORY STATEMENT

232 Realty Associates ("Applicant") has retained the professional land use planning and zoning consulting services of Pimentel Consulting, Inc. ("Consultant"), in order to evaluate the appropriateness of developing certain property for much-needed, both rental and owner-occupied 'affordable housing' purposes. The proposed affordable housing development will consist of 162-units, of which 41-units (25%) will be deemed affordable. The proposed housing count is permitted as a matter-of-right pursuant to the Affordable Housing Statute minimum allotted base density. The referenced development is being pursued via the Comprehensive Permit regulatory procedural process in order to realize much-needed affordable housing, while allowing for the provision of several reasonable 'Adjustments' (otherwise identified as variances and/or waivers). The referenced Adjustments are absolutely appropriate when considering multi-unit housing is the only means of even remotely achieving affordable housing compliance. In addition, as this report will evidence, the detailed Adjustments are not only supported but acknowledged as being hindrances to the production of affordable housing, by both the community's Housing Plan and Comprehensive Plan. In addition, the development is defined as a Major Land Development Project ("Major LDP"). This report will also evidence how the community has had difficulty in procuring affordable housing, and therefore it is absolutely necessary that every viable project be properly considered and ultimately welcomed.

The following, excerpted from the Town's Affordable Housing Plan [Page 3], evidences affordable housing compliance objectives.

Objectives of the Coventry Affordable Housing Study - *"...Overall Study objectives include:"*

- o *"Develop municipal policies and specific, measurable actions that reflect the Town's commitment to rental and owner-occupied affordable housing and will **help the Town reach the 10% affordable housing standard** set by the Low and Moderate Income Housing Act (Ch 45-53)."*
- o *"Ensure that people living, working and raising children in Coventry can afford to live in the Town."*
- o *"**Encourage partnerships between the Town, non-profits, and private developers** to address housing challenges and develop affordable housing."*
- o *"Gain community support and acceptance for affordable housing within the Town."*
- o *"Promote housing opportunities that further Fair Housing goals."*

In light of the stated proposal, this Consultant has thoroughly reviewed the proposed affordable housing development submission, in addition to the following regulatory documents:

- o Town of Coventry Comprehensive Community Plan - Adopted 14 August 1992 - Amended Through 19 June 2000 ("Comprehensive Plan");

"Current Zoning provides opportunities for affordable housing to be built. Changes in zoning are not necessary to effectuate housing affordability. The Town currently allows multi-family and mobiles homes as well as half-acre-lot-housing, which with the relatively low cost of land provides many opportunities for affordable housing." [Page D.4-6]

- *"The Town of Coventry should encourage affordable housing development by the private sector targeted to moderate-income groups, particularly first-time homebuyers."*

- o Town of Coventry Subdivision and Land Development Regulations ("Development Regulations");

- o Town of Coventry Zoning Ordinance ("Ordinance");

- o Town of Coventry Affordable Housing Production Plan - Amendment to the Comprehensive Community Plan - Adopted November 2004 - Revised June 2005 ("Housing Plan");

Introduction - *"The Town of Coventry recognizes the importance of providing a diverse range of housing so that Coventry residents of all income levels have access to safe, decent, and affordable housing...this Affordable Housing Study to review the Town's housing policies, determine how the housing needs of the of the population have changed over the past decade, and identify and develop strategies for the Town to ensure that the diverse housing needs of residents are met." [Page 1]*

- o Housing Fact Book(s) - Housing Works RI at Roger Williams University ("Housing Fact Book"); and,

- o Pertinent Rhode Island General Law ("RIGL"), inclusive of recent statutory amendments, and pertinent case law.

Furthermore, this Consultant has conducted a general analysis of the immediate neighborhood, for the express purpose of evidencing neighborhood compatibility. This report will render a determination on the appropriateness of the proposed affordable housing development project, in light of the respective Comprehensive Plan, Housing Plan, Development Regulations and Ordinance goals and objectives, and respective affordable housing statutory 'standards' of approval.

PRESENT PROPERTY CONDITIONS

The subject property is comprised of several parcels and situated between Tiogue Avenue (RI Route 3) and Tiffany Road, being defined as a through lot, further identified as Tax Assessor's Plat 32, Lot(s) 149, 150, 151, and 153 ("Property"). The Property contains an approximate total land area of 26.99-acres, all off which is deemed suitably developable. The Property is uniquely shaped in an elongated bowling-like configuration, extending in excess of 3,500 linear feet

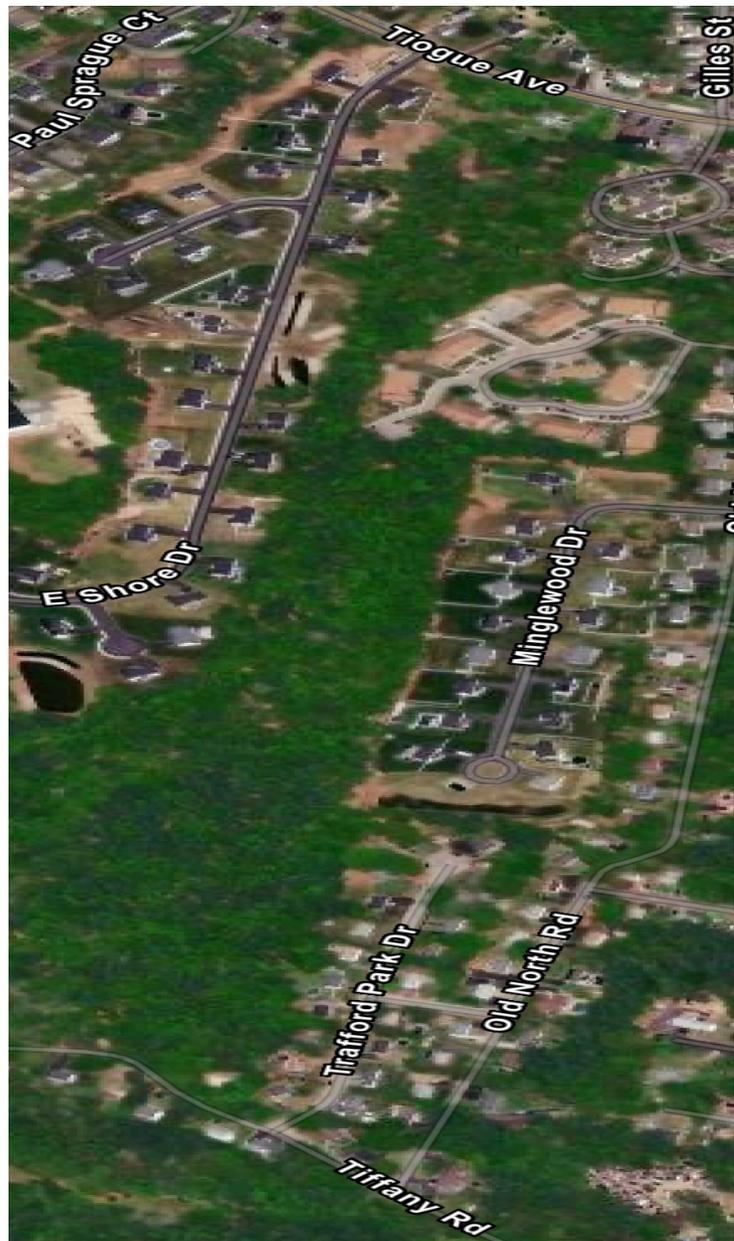
between Tiogue Avenue and Tiffany Road. The Property is presently comprised of mature treed vegetation, which is a vitally important site feature because it provides natural perimeter buffering; visually screening future development. The Property will be properly improved with both public sewer and water, assuring appropriate and environmentally sound residential development. Another pertinent consideration evidencing appropriate multi-unit residential development is the presence of multiple access points, to include: approximately 265 linear feet of lot frontage along Tiogue Avenue; 50-foot right-of-way out towards East Shore Drive; 50-foot right-of-way out towards Minglewood Drive; and approximately 275 linear feet along Tiffany Road. The presence of such excessive lot frontage permits considerable options in locating appropriate points of ingress and egress, assuring that vehicular traffic is properly integrated into the surrounding neighborhood(s), and assisting in accommodating residents, guests, and most importantly emergency apparatus.

Pursuant to the Comprehensive Plan - ‘Existing Transportation System Map’ [Page B.6-7], Tiogue Avenue (RI Route 3) is functionally classified an ‘Urban Principal Arterial’ roadway. The referenced roadway classification is defined by the Comprehensive Plan [Page D.2-9], in the following manner:

Principal Arterials - *“The principal arterial system should serve the major center of activity of a metropolitan area, the highest traffic volume corridors and the longest trip desires, and should carry a high proportion of the total urban travel demand on a minimum of roadway mileage.”*

Property and roadway characteristics are illustrated to the right, as excerpted from the Town’s GIS.

Another pertinent area feature, and one that is a recognized by the Comprehensive Plan [Page D.4-9] as



being a contributing factor to evidencing denser housing development, is the presence of multi-modal transportation, most notably public transportation.

1. Encouraging the development of high density residential areas - *"In mixed use developments and along arterial corridors because of its."*

- *"Proximity to community services and facilities."*
- **Access to public transit routes.**
- *"Proximity to employment opportunities."*

"through the adoption of a Land Use Plan that provides for the orderly development of a balanced mix of housing types."

The illustration below, as excerpted from the Rhode Island Public Transit Authority website, details a bus-line traversing Tiogue Avenue in the general location of the Property.



A final, and perhaps most pertinent consideration supporting multi-unit residential development, is evidencing neighborhood compatibility. Directly abutting to the east, mid-point of the Property, is housing resources under the ownership of the Coventry Housing Authority ("CHA"). The CHA property contains approximately 8.7-acres and is improved with eight (8) separate multi-unit residential facilities, each of which contain 12-units, for a total of 96-units. Furthermore, the CHA property is improved with approximately 47,804 square feet of building footprint, or 12.6% of total building coverage. Just east of the CHA development, and likewise directly abutting the

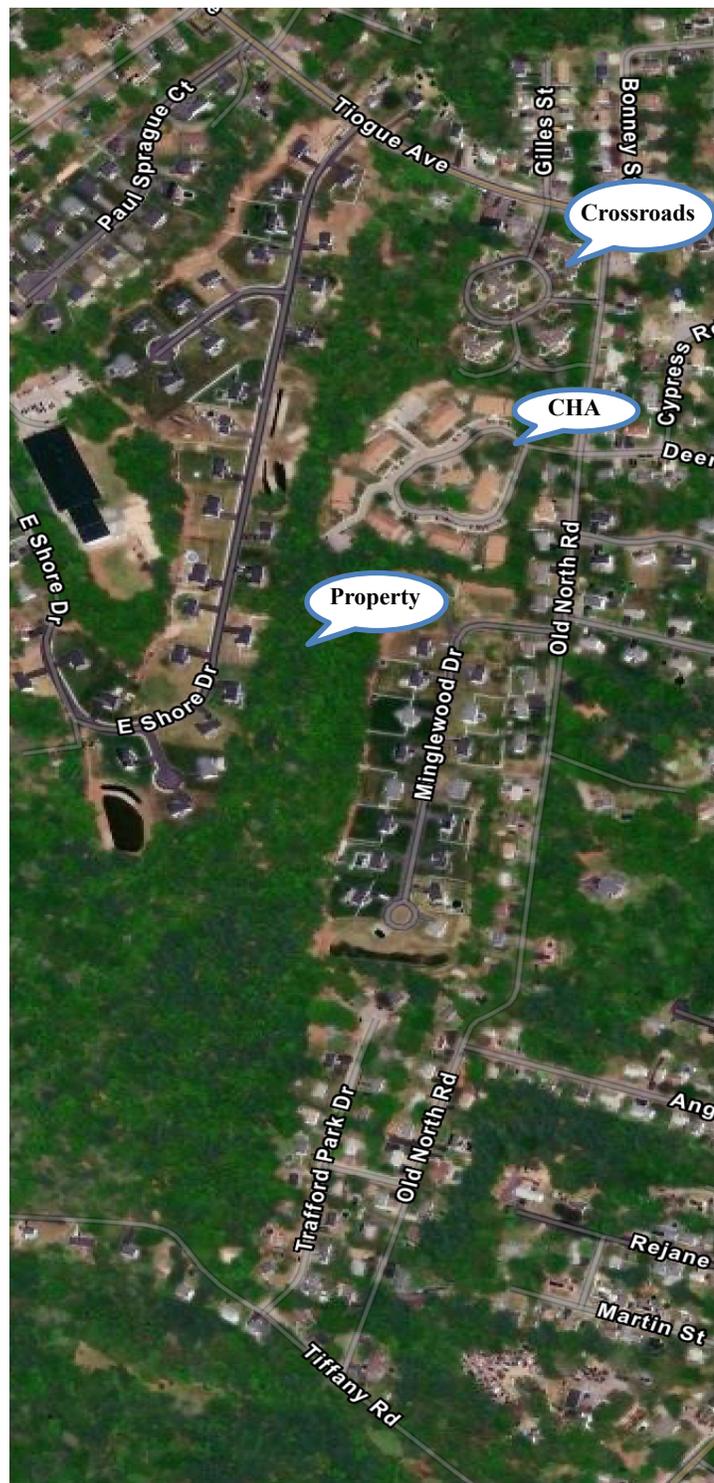
Property along Tiogue Avenue, is a somewhat similar clustered-style 'affordable housing development, otherwise identified as the 'Coventry Crossroads' ("Crossroads") apartment complex. The Crossroads development contains approximately 4.9-acres and is improved with four (4) separate residential facilities, each of which contain an average of 8-units, for a total of 32-units. Furthermore, the Crossroads property is improved with approximately 18,716 square feet of building footprint, or 8.77% of total building coverage. The respective densities are as follows:

CHA Unit Density = One-unit per 3,947 square feet.

Crossroads Unit Density = One-unit per 6,670 square feet

Surrounding neighborhood character is illustrated to the right, as excerpted from the Town's GIS.

The Property is presently zoned R-20 Residence District ("R-20 District"), to include the entire surrounding neighborhood, constituting the most dense residential zoning designation.



This is a vitally pertinent neighborhood characteristic, because it evidences just how well developed is the general area; averting any concerns about density inconsistency. The R-20 District is defined pursuant to Section 255-500 'Zoning Districts - Residential' of the Ordinance, in the following manner:

R-20 District. *"These are quiet, higher density residential areas of the Town, plus certain undeveloped areas where similar residential development will likely occur in the future. Public water is generally available and public sewers are planned. Public facilities and a wide range of services are available. The minimum lot size for development is 20,000 square feet."*

The Comprehensive Plan clearly acknowledges and directs development towards the easterly portion of the of the Town where high-density development and supporting infrastructure already, or is intended to, exist, and there are few, if any, constraints to development in comparison with the central, and more-so, westerly portions of Town.

B.3.1 Land Use and Zoning - Existing Land Use Pattern - *"The general pattern of development in Coventry occurred along the major thoroughfares throughout the Town..."* [Page B.3-1]

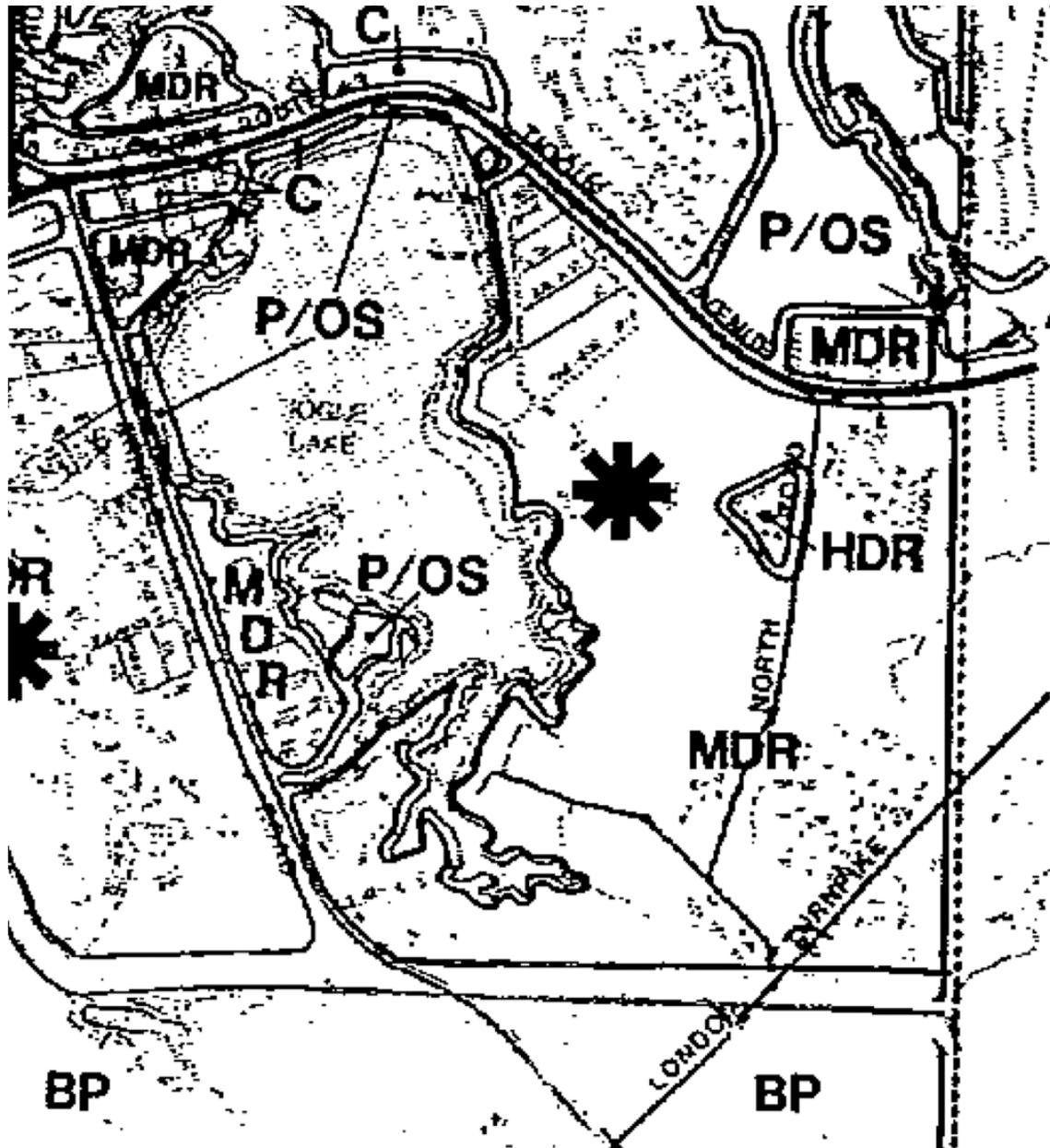
Residential Uses - *"Residential uses can be grouped into three categories in Coventry, single-family, multi-family and mobile home. The dominant use is single-family housing... Multi-family housing and mobile homes generally are found in isolated areas in the eastern half of the Town. Most higher density residential uses are located in the former mill villages, or along major arterial roadways."* [Page B.3-2]

The R-20-District not only properly reflects present neighborhood development patterns, but is also consistent with the present land use classification pursuant to the Comprehensive Plan - Future Land Use Map ("FLUM"). The FLUM, illustrated on the following page, acknowledges that properties situated to the north, west, and south are classified in a 'MDR - Medium Density Residential - 1 DU/0.5 AC ≤ MDR < 1 DU/2 AC' manner. However, the FLUM also acknowledges that the property immediately abutting to the east is classified in a 'HDR - High Density Residential - 1 DU/ 0.05 AC ≤ HDR < 1 DU/ 0.5 AC' manner. The 'MDR' and 'HDR' land use classifications are defined below pursuant to the Comprehensive Plan - Land Use Plan Element:

Medium Density Residential (MDR) - 1 DU/0.5 AC ≤ MDR < 1 DU/2 AC: *"The purpose of the Medium Density Residential district is to identify areas where more 'suburban type' residential development is desirable. Suitability for development will be determined by natural and man-made constraints, availability of public services, transportation access and the impact on adjacent planned or existing land uses. Most Medium Density Residential areas are served by public utilities and facilities...residential densities greater than 1 DU / 0.5 AC may only be allowed if areas of lower density off-set the increase such that an average of no more than 1 DU / 0.5 AC is maintained (i.e. residential cluster development). Higher density land uses will also require more stringent review."* [Page D.1-3]

High Density Residential (MDR) - 1 DU/ 0.05 AC ≤ HDR < 1 DU/ 0.5 AC: *"The purpose of the High Density Residential district is to denote areas where multi-family residential development is appropriate. This level of residential use would require public facilities to have*

sufficient capacity to service the development. It would also require adequate transportation access and impacts on the site and surrounding neighborhoods to be minimized..." [Pages D.1-3 - 1-4]



With the exception of the Residential Mobile Home District, which is solely for the creation of mobile home parks, there is literally no zoning designation that permits multi-unit residential development as a matter-of-right. The Town of Coventry has well documented throughout the Comprehensive Plan their concern regarding development throughout the central and westerly, more rural, portions of the community; areas in which infrastructure is lacking and vastly greater

sensitive features to be protected. It is the desire of the community to preserve a more rural / agricultural atmosphere, a condition that is forever being eroded. In-fill development within the easterly side is clearly preferred, as evidenced throughout the Comprehensive Plan [Pages D.1-11 - D.1-13 and Page D.4-5].

A. The Plan seeks to maintain Coventry's Diversity - *"The Land Use Plan recognizes that Coventry is composed of three geographic areas - eastern, central, and western Coventry - whose diverse nature is a defined characteristic of Coventry. Each area contains important resources that contribute significantly to Coventry as a whole."*

1. Eastern Coventry:

"Eastern Coventry can be characterized as a densely-populated suburban community, housing a large portion of the Town's residents. *The landscape is largely defined by mature neighborhoods that developed around various historical mill villages and several bodies of water, including Tiogue Lake, Huron Pond, and the Pawtuxet River. Standardized housing and company-built stores and schools can still be seen in many of the village centers. Residences in this area are principally located on modest parcels of land."*

"Overall, eastern Coventry can be described as a densely-populated suburban community whose history has shaped its development pattern. It is only in this area that public facilities and services are provided or planned."

4. Protection of Coventry's Diversity

"...Consequently, the main thrust of the Land Use Plan is to preserve the existing diverse character of Coventry, by treating the three areas of Coventry as distinctive. For instance, the Land Use Plan guides growth to the eastern portion of the Town, where Town services and facilities (such as educational facilities, water, sewer, police, and fire) are in adequate supply or planned. The Plan for the eastern portion of the town envisions medium and high density residential use and commercial / business park / office uses within its bounds. In this way, the existing settlement pattern of Coventry is followed."

"In this way, the Land Use Plan seeks to protect Coventry's diversity, by recognizing Coventry's diverse features and planning for their continuance."

"Most housing development activity has occurred in the eastern and central portions of Coventry leaving most of western Coventry relatively undeveloped, or developing at a very low density (less than one dwelling unit per acre). The main factors dictating this trend are an aggressive posture on the part of the Town Council and Planning and Zoning Commission."

1. *"To protect the large areas of environmentally sensitive groundwater aquifers, wildlife habitats and surface water resources in this area."*

2. *"To maintain the rural, low density lifestyle in western Coventry clearly identified by citizens and the CPAC during the comprehensive planning process."*

3. **"To concentrate density (1 DU / 2 AC - 2 DU / AC) residential development in the eastern half of Coventry in closer proximity to employment opportunities, community facilities, commercial services and potential future infrastructure (e.g. sanitary sewers) under consideration for development."**

Pursuant to the Comprehensive Plan - Table D.1-1 'Anticipated Development Potential, Town of Coventry' [Page D.1-20], the lower density land use classifications, areas in which multi-unit housing is both deemed inappropriate and therefore prohibited, comprises in excess of 76% of all town-wide land resources. This does not include commercial and industrial land resources, properties that may be encumbered and preclude mixed-use development, nor recreational, conservation and open space land resources amidst the eastern portion of the Town that has been permanently protected from development. Therefore, the community must accommodate appropriate denser residential development, to include provision of affordable housing, within those limited remaining land resources. And obviously, much of the remaining stated land acreage has already been developed, further complicating the situation. This corroborates this Consultant's conclusion that accommodating greater residential density in a fairly regulatory compliant manner that is neighborhood compatible, can be a difficult endeavor. Any proposal that realizes in-fill development of under-utilized land area in the eastern-most portion of Town, especially if said area is accessible to all requisite public resources, should be well-supported for more intensive residential development.

DEVELOPMENT PROPOSAL

It is not unusual for the typical affordable housing development proposal to be sought pursuant to a Comprehensive Permit, because it is usually the only viable method of acquiring a market-rate density bonus to offset the considerable cost of realizing 'much-needed' affordable housing. The Comprehensive Permit is well recognized by the community as an appropriate means of achieving affordable regulatory compliance, and is in fact one of several tools detailed in the Housing Plan [Pages 39 40]. The associated criteria is directly aligned with the Property, as evidenced below, and should therefore assist the Planning Board in their affirmative deliberation.

Action Item 1.6: Use the Comprehensive Permit as a tool to development affordable housing. *"Comprehensive permitting provides flexibility in places where underlying zoning does not allow for dense affordable housing...In considering such a project, the Planning Commission may consider waivers from any of the underlying zoning and planning requirements in exchange for providing the Town with a minimum of 25% of the project be set aside as affordable housing as defined by the State of Rhode Island General Laws."*

"There are several areas in the Town that are suitable for a comprehensive permit for affordable housing. These sites are located in high density areas of Town that are serviced by either municipal water or sewer, or both, as well as being on or near a RIPTA bus line. These attributes make these sites absolutely vital in our goals to obtain affordable housing in practical locations..."

The Applicant proposes to develop the Property in a manner envisioned by the Comprehensive Plan, realizing regulatory compatible density, and more importantly, provision of much-needed affordable housing. As previously noted, the Property has approximately 26.99-acres of total upland land resources. The Applicant proposes a total of 162-units, which is in accordance with the minimum base-density permitted by law. The referenced units will be a combination rental and owner-occupied, and uniquely configured to address a wide-assortment of general housing, and more importantly, affordable housing need. The Applicant proposes true single-family home-sites, in addition to multi-unit attached and detached units. The units will be improved with a combination of two (2), three (3), and four (4) bedrooms, for purposes of addressing the needs of all. The project will literally meet the greatest affordable housing concerns, whether to rent or own, inclusive of individuals and couples looking for a starter home, families, and those seeking to down-size. In fact, many of these units are quite often absorbed by in-town residents who have long-established roots, and yet being priced out of their very community. The Comprehensive Plan and Housing Plan acknowledges that the public sector alone is incapable of achieving provision of much-needed affordable housing.

"The Town of Coventry should encourage affordable housing development by the private sector targeted to moderate-income groups, particularly first-time homebuyers..." [Page D.4-6]

3. Strengthen Partnerships and Build Community Support for Affordable Housing.

Issue - "In order to achieve 10% affordable housing, a foundation of understanding and cooperation is necessary among all stakeholders. The Town, through the Coventry Affordable Housing Advisory Committee, will assist in fostering and maintaining strong, supportive relationships between Town government, the Coventry Housing Authority, the Coventry Housing Associates, and other non-profit and for-profit affordable housing developers. Establishing affordable housing as a priority and addressing the recommendations included in this Plan will set the stage for partnerships and working relationships." [Page 45]

The development will be introduced in a two-grouping clustered manner, reflecting the unique characteristics of development and Property, alike. The first cluster will be comprised of multi-attached single-family units, and physically separated from the other two (2) clusters. Access will be furnished via a single point of ingress and egress from Tiogue Avenue. The second cluster will access from three (3) distinct points of ingress and egress, to include Tiffany Road, East Shore Drive, and Minglewood Drive. The second cluster will be comprised of both single-family detached 'townhome style' and true single-family detached homesites situated on their own respective parcels. All home-sites will be situated mid-point of the respective clusters, surrounding purposefully narrowed looping drives, for purposes of preserving Open Space and maintaining a vegetated perimeter buffer. Preserved Open Space will approach approximately 6.33-acres, or 23.5% of the overall Property. Mandating greater roadway widths and associated

unnecessary infrastructure will generate greater volumes of runoff and limit preservation of green-space. It is also a contributing factor to averting affordable housing production; increasing overall cost and needlessly exhausting land resources. Furthermore, relaxing roadway infrastructural standards is a common conventional development practice. This is not only corroborated by the Housing Plan [Pages 26 - 27], but literally reflected in proximate surrounding developments.

Subdivision Regulations and Review Process - *“Another factor that influences housing affordability is a community’s subdivision regulations and review process. Subdivision regulations set standards not only for houses, but also streets, sidewalks, curbing, drainage, open space, parking requirements and infrastructure improvements...”*

*“...However, one public participant felt that Coventry’s subdivision regulations, especially its road requirements, were especially strict and increased the costs of providing housing. A review of some of the Town’s subdivision requirements is presented in Table 11. **Width and material requirements for roads, sidewalks and curbing can add significantly to the cost of development. Although these standards are required, the Town Planning Commission has the power to waive any of these requirements for a particular development and has done so in the past. It should also be noted that Coventry has less stringent requirements for residential compound developments.**”*

More than sufficient off-street parking, accommodating residents and visitors alike, will be furnished throughout the site. The development will be serviced by both public water and sewer, as well as have proximate access to public transit; factors that contribute to the appropriateness of densifying the Property in the manner so-described. It necessitates reemphasizing that the Property is entirely comprised of upland resources. Therefore, pursuant to the Affordable Housing Statute, which excludes wetlands proper, all 26.99-acres (or 100%) of the land area is deemed developable. Excluding the anticipated land area dedicated to the proposed roads and associated infrastructure, which amounts to approximately 2.40-acres, and a de minimus 0.003-acres dedicated to easement(s) of record, the suitable land area is reduced to 24.587-acres (or 91.1%). The following table provides a comparative breakdown of the documented constraints.

Development Constraint	Acreage	
Wetlands:	0.00	0.00%
Land area free of development constraints – 26.99-acres (100%)		
Proposed Roadways and Associated Infrastructure:	2.40	8.90%
Easement(s) or Right-of-Way(s) of Record:	0.003	0.0001%
Total:	2.403	8.90%
Land area deemed suitable for development, less roadways and associated infrastructure and easement(s) or right-of-way(s) of record: 24.587 (91.10%)		

It also necessitates emphasizing that the Property is not comprised of significant resources such as prime agricultural soils, water-bodies, groundwater resources, etc., as evidenced by the list of major areas identified via the Comprehensive Plan, all of which are located outside the perimeter of the subject property. The respective maps corroborate this fact, as evidenced by the following list excerpted from said Comprehensive Plan.

Prime Agricultural Lands Map

Illustrates that there are no prime agricultural lands within, surrounding, or in close proximity to the Property.

Natural and Cultural Resources Map

Illustrates that the Property is neither located within or in proximity to any 'Groundwater Reservoir,' 'Groundwater Contamination Site,' 'Site of Unique Landscape Quality,' 'Area of Rare and Endangered Species,' or Historic District.'

Recreation, Conservation and Open Space Map

Illustrates that neither the Property nor proximate neighborhood are improved with or encumbered by any recreation, conservation or open space resource.

The Town is regulated to meeting its anticipated residential build-out, of which ten-percent must be defined as 'affordable', on those appropriately situated remaining limited land resources. Therefore, opportunities such as that being presented to the Town of Coventry should be well-supported, considering the surrounding general medium and high-density residential character and non-existent property constraints. The subject property contains in excess of 91% suitable land area, after excluding roadway and associated infrastructure, thereby clearly illustrating the appropriateness of the subject property for much denser residential development. A detailed illustration of the subject development is provided below, as excerpted from the Applicant's submission package [Credit: DiPrete Engineering].



OVERVIEW ANALYSIS – SITE APPROPRIATENESS

The development will realize much needed affordable owner-occupied and rental housing, addressing the needs of all respective groups, to include individual and couples seeking starter homes, families, and older individuals down-sizing; many of whom could very well be long-standing citizens. The overall development will result in a total of 162-units, of which 41-units (or 25%) will be deemed affordable. A density analysis has been prepared, the results detailed in the following table.

Proposed Development	Density Analysis	
	Entire Land Area (26.99-acres)	Excluding Road Infrastructure (2.4-acres and Easements (0.003-acres)
Unit Density	162-units / 26.99-acres = One-unit per 7,257 sf	162-units / 24.587-acres = One-unit per 6,611 sf
Neighborhood Analysis		
Unit Density		
CHA	96-units / 8.70-acres = One-unit per 3,947 sf	
Crossroads	32-units / 4.90-acres = One-unit per 6,670 sf	

Supporting affordable housing developments in such appropriately situated areas, will assist in achieving affordable housing goals while averting development in western and central Coventry where infrastructure is lacking and preserving the rural character is the community's overall objective. Although affordable housing developments are at times opposed by community groups for one obvious reason, namely the density increase over that which is permitted by the immediate area's conventional zoning, the Town of Coventry recognizes this misperceived obstacle, as evidenced by the Housing Plan [Page 5].

Other Issues - *“Negative Perception of Affordable Housing in Community: “In Coventry, as in many communities, some residents have a negative misconception of affordable housing. “NIMBYism” (Not In My Back Yard-ism) is a major problem that reduces overall community support for the development of affordable housing.”*

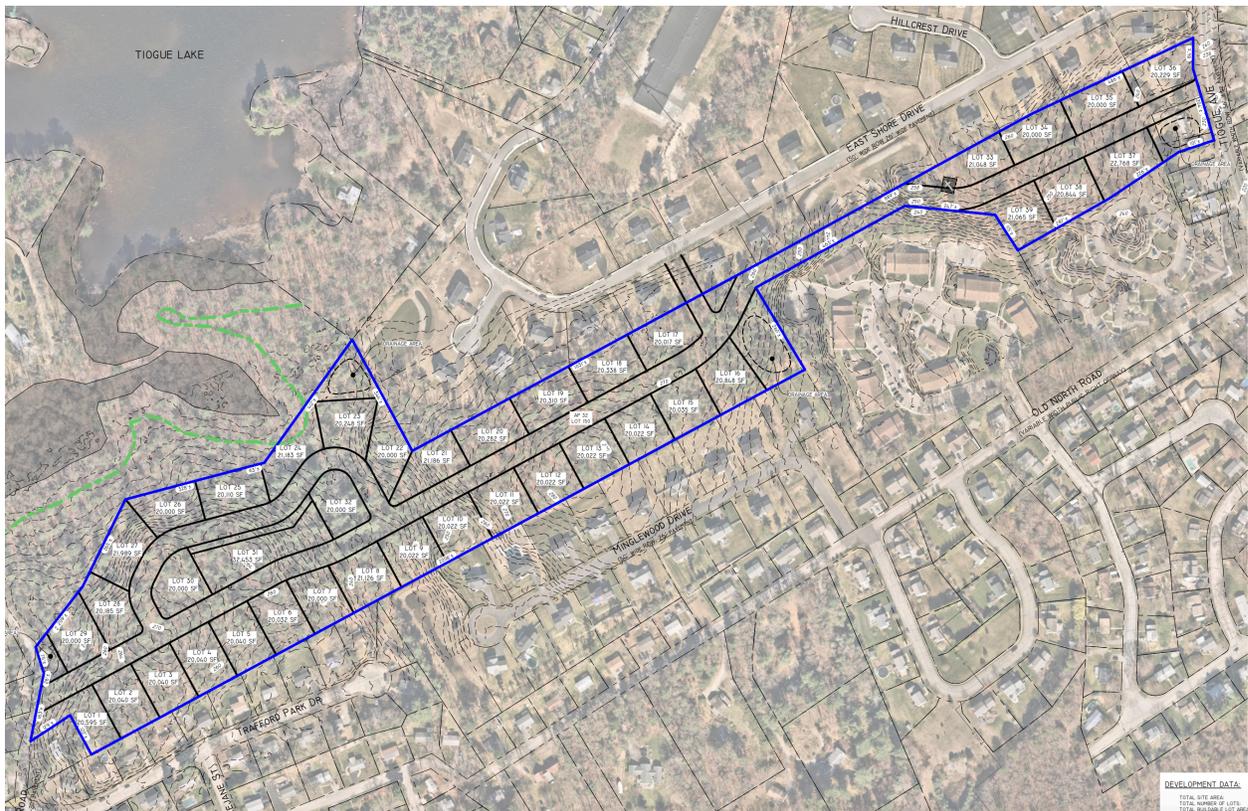
EVIDENCING NEED and DENSITY APPROPRIATENESS

Although the Town of Coventry was initially successful in the production of affordable housing, having generated upwards of 663-units in 2005, progress has trickled in ever since. Since 2005 the community has achieved a total of 315-units, or an average of 16-units per year. Pursuant to the 2025 Housing Fact Book, the Town of Coventry has approximately 441-units dedicated to the elderly, 508-units to families, and 29-units to those with special needs. Therefore the

resulting total is 978-units, or a 6.65% affordable housing provision. This should be contrasted with the 2005 Housing Fact Book, which detailed that the community had then procured a total affordable housing of 5.16%, or an increase of 1.50% over 20-years. It is therefore obvious that the community has had great difficulty in realizing regulatory compliance. All reasonable and neighborhood compatible proposals must be carefully considered, particularly if the objective is averting usage of rural resources with limited infrastructure.

The proposed density is most assuredly appropriate, considering it is the base minimum density pursuant to the amended Affordable Housing Statute, as evidenced by the following:

Conventional Yield: Approximate number of units that could be realized by means of a conventional development. The Applicant had a 'Yield Plan' prepared to properly document the base count = 39-units.



+

Bonus Density: 26.99-acres (Total Property Acreage) - 2.403-acres (Roadway and associated infrastructure and easements) = 24.587-acres * 5 (Base density when connected to both public sewer and water and realizing 25% affordability) = 123-Units (Base density permitted pursuant to the recently amended affordable housing statute)

= **162-units** (Total permissible unit count)

R.I.G.L 45-53-4 – Required Findings

In accordance with R.I.G.L 45-53-4, the applicant is obligated to address the requisite standard provisions. R.I.G.L 45-53-4(d)(2)(iii)(E) expresses the following required findings:

R.I.G.L 45-53-4(d)(2)(iii)(E) Required Findings: *“In voting on an application, the local review board shall make findings, supported by legally competent evidence on the record that discloses the nature and character of the observations upon which the fact finders acted, on each of the following standards, where applicable:”*

(I) *“Whether the proposed development is consistent with local needs as identified in the community’s affordable housing plan and/or has satisfactorily addressed the issues where there may be inconsistencies. If the local board finds that the proposed development is inconsistent with the community’s affordable housing plan, it must also find that the municipality has made significant progress in implementing its housing plan.”*

In regard to overall statutory compliance, achieving 10% of year-round housing, the Housing Plan [Page 31] prepared a build-out analysis that concluded that the Town could very well approach 23,500-units at full build-out. However, it would literally take numerous decades to exhaust all land resources. Considering the Housing Plan was prepared to address need over a shorter 20-year timeframe, achieving statutory compliance by 2025, incremental housing production was likewise concluded. The Housing Plan determined that year-round housing could very well approach 15,196-units by 2025, thereby necessitating 1,520 affordable housing units. This translated to a shortfall of 860-units; which would be realized incrementally, or approximately 43-units per year over the stated 20-years. Provision of affordable housing has been considerably slower, achieving on average 16-units per year, or a shortfall of 542-units. Actual year-round housing count according to the 2025 Housing Fact Book is approximately 14,706-units, or an actual shortfall of 493-units. At the present annual provision rate of affordable housing, it would take upwards of 31-years, exclusive of any new housing construction. It can therefore be categorically concluded that achieving regulatory compliance has been, and will continue to be quite difficult, unless every viable project is supported to the fullest extent feasible.

In regard to addressing specific need, the Housing Plan expressly notes that greater quantities of both affordable home ownership and rental resources are necessary.

II. Housing Issues in Coventry [Issued by the Public] [Page 4]

- o Rental Housing is Difficult to Find.**
- o Existing Rental Housing is Expensive.**
- o Homeownership Opportunities Have Decreased, while Prices Have Increased.**

III. Housing Trends and Inventory - Low-Moderate Income Housing Stock

Affordable Homeownership - *“Reaching the 10% goal will require a combination of affordable rental and homeownership units. Given the high prices of newly developed single-family homes, there is a strong demand for affordable homeownership units in Coventry. [Page 12]”*

IV. Analysis of Housing Needs - Comprehensive Housing Affordability Strategy (CHAS) Data

o Both low-income homeowners and renters experience housing problems. “On a percentage basis, low-income homeowners (50.4%) and renters (50.4%) are equally likely to experience housing problems...”

“Therefore, in terms of meeting affordable housing needs, the Town should prioritize both rental and homeownership units, family housing, and housing targeted to those earning less than 50% of median income.” [Page 18]

Populations in Need of Affordable Housing [Page 18]

Families - *“...Working class families cannot afford to buy a home in Coventry. It is especially difficult for young families to find starter housing in Coventry. There is also a need for more rental housing in Coventry. With single family home prices so high, rental housing is the only alternative for many families. Family rental housing must have enough bedrooms (3 or 4 bedrooms) to accommodate the needs of families.”*

Elderly - *“Coventry’s elderly population is growing, which places demands on the housing market...With limited incomes and specific housing needs, it can be a challenge to provide appropriate housing for the elderly. For many elderly homeowners, staying in their large homes is no longer an option, for financial, medical, and/or maintenance reasons. These residents could downsize, but there are not enough appropriate units available.”*

This affordability gap has grown exponentially in just the last several years, average home price increasing by \$175,000 (or 74%) since 2018, contrasted with the average median income that has increased by only 51%; evidencing a growing discrepancy. To counter this the community proposed a more robust provision of family and elderly housing, amounting to an additional 677-units of family housing and 100-units of elderly housing during the 20-year timeframe to realize statutory compliance. And yet, only 325 additional units of family housing (or 52% shortfall) and 37-units of elderly housing (or 63% shortfall) has been realized. There is therefore clear need, as has been well documented throughout the Housing Plan.

(II) *“Whether the proposed development is in compliance with the standards and provisions of the municipality’s zoning ordinance and subdivision regulations, and/or where adjustments are requested by the applicant, whether local concerns that have been affected by the relief granted do not outweigh the state and local need for low and moderate income housing.”*

Several Adjustments will be sought pursuant to the Affordable Housing Statute. The referenced Adjustments address introduction of prohibited multi-unit residential development and

associated dimensional criteria, in addition to minimizing roadway and associated infrastructure. These are considerations that are very typical of affordable housing developments, and traditionally granted. However, what renders them even more appropriate is the literal recognition by the community as to their appropriateness, as evidenced by both Housing Plan and Comprehensive Plan. Affordable housing development opportunities are severely constrained by present zoning regulations, limited 'developable' land resources, and lack of requisite infrastructure town-wide, other than in the eastern portion.

Other Issues [Housing Plan - Page 5]

o Lack of Public Infrastructure: *"The lack of sewers in some parts of Coventry is also an issue with regard to affordable housing development, as this limits project density."*

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Developable Land - *"Eastern Coventry is a mix of typical suburban developments and older villages. Public water is available in eastern Coventry...In contrast, both central and western Coventry are much more rural and undeveloped, and there is a great deal of available land. Land in central Coventry is primarily zoned for three-acre lots, while land in western Coventry is primarily zoned for five-acre lots. Central and western Coventry lacks infrastructure, including public water, roads, and schools."* [Housing Plan - Page 30]

Furthermore, the Housing Plan and Comprehensive Plan acknowledge that many of the detailed Adjustments are in fact hindrances to realizing provision of affordable housing, thereby affirming this Consultant's argument that they are both appropriate and reasonable.

REGULATORY ISSUES

Minimum Lot Sizes are Too Large for Affordable Housing Production: *"Coventry has land available for new development, but most of the land is zoned in a way that makes building affordable housing difficult. The densest zoning category (R-20) has a minimum lot size of 20,000 s.f. (roughly one dwelling unit per one-half acre). Much of the land in this zoning category is already built out. Minimum lot sizes increase to 2 acres, 3 acres, and 5 acres in other zones."* [Page 4]

Current Zoning Designations Limit Multi-family Unit Production: *"The current Zoning designations limit the production of multi-family units, since this type of development is only allowed in the R-20, the Village Residential Commercial, and Village Main Street Commercial zones. There is little available land in these zones, especially for larger developments."* [Page 5]

Subdivision and Land Development Regulations are Strict, Adding to Cost of Housing Production: *"According to developers, Coventry has rather extensive subdivision requirements, adding to the costs of housing development. Road requirements were specifically cited as an impediment to affordable housing development."* [Page 5]

AFFECT OF MUNICIPAL REGULATIONS ON THE COST OF HOUSING

Land Costs and Zoning - *"The principal cost of any home is the cost of the land it is built on. As such, zoning plays an important role in determining housing costs, because it dictates the minimum lot size per unit. Higher density residential zoning and smaller minimum lot sizes decrease the land costs per unit, making it less costly to develop housing. The availability of land in high-density zoning districts directly affects the feasibility of affordable housing production..."* [Page 26]

Comprehensive Plan D.4.2 Housing Implementation Guidelines - *"The implementation techniques recommended to carry out the housing goals and objectives of the **Coventry Comprehensive Community Plan** are presented below in the following three categories."* [Page D.4-8]

- *"New Housing Development."* [Page D.4-8]

a. New Housing Development - *"The techniques recommended to stimulate new, quality, affordable housing development in Coventry include."* [Page D.4-8]

1. Planning, programming and devising a program to finance infrastructure extensions - *"(such as existing sanitary sewers and sidewalks) in eastern Coventry to encourage infill development in areas targeted for medium and high density residential development."* [Page D.4-8]

2. Considering the granting of density bonuses. *"(10-15%) when evaluating rezoning proposals for PUDs (primarily residential over 20 acres) or larger residential subdivisions (over 50 dwelling units) when at least 10% of the housing proposed is targeted to low-income (51-80% of median income) and moderate-income (81-95% of median income) families, or for special population groups (e.g. seniors, handicapped, etc.)."* [Page D.4-9]

5. Considering the formulation of a set of rural housing development standards - *"That could be utilized...to reduce the overall cost of housing. **This might include, but would not be limited to, narrower street widths (geared to housing densities), no sidewalk requirements or only one sidewalk required per street, no curb and gutter requirements with proper drainage contouring,** reduced street lighting standards from urban neighborhood requirements, cost effective means to construct community wells and sewage treatment systems, etc...This strategy should be coupled with Strategy #2, above, granting a density bonus for affordable housing development."* [Page D.4-9]

(III) *"Whether the low- and moderate-income housing units proposed are integrated throughout the development; are compatible in scale, meaning that: (1) The size of the low- and moderate-income units shall not be less than seventy-five percent (75%) of the size of the market rate units, unless otherwise allowed by the local board; (2) The affordable units are of similar architectural style to the market rate units within the project so that the exterior of the units look like an integrated neighborhood with similar rooflines, window patterns, materials and colors; and (3) Th affordable units will be built and occupied in a proportional manner with the construction and occupancy of the market rate units. Except that for housing units that are intended to be occupied by persons fifty-five (55) years of age or older, or sixty-two (62) years of age or older, as permitted by the federal Fair Housing Act pursuant to 42 U.S.C.A. Section 3607(b) and 24 CFR Section 100.300-308 and the Rhode Island fair housing practices act*

pursuant to Section 34-37-4.1, such units need not be integrated in any building or phase within the development that contains housing units that are not age-restricted, and neither age-restricted housing units nor any building or phase containing age-restricted housing units must be compatible in scale and architectural style to other housing unit types to the extent the age-restricted housing units are designed to meet the physical or social needs of older persons or necessary to provide housing opportunities for older persons."

The affordable units will be constructed of somewhat similar materials and architectural styles, and purposefully distributed, such that they will be properly integrated. Finally, the 41 affordable units will be introduced in a proportionate manner with construction of the market-rate units.

(IV) *"Whether there will be significant negative impacts on the health and safety of current or future residents of the community, in areas including, but not limited to, safe circulation of pedestrian and vehicular traffic, provision of emergency services, sewerage disposal, availability of potable water, adequate surface water run-off, and the preservation of natural, historical or cultural features."*

There are no valuable agricultural soils, historical and/or cultural resources, or groundwater resources within proximate distance of the Property. The Property is entirely appropriate for more dense development, being entirely comprised of upland area. As will be addressed in both plan and oral testimony by respective experts, the Property can be safely engineered for multi-structure, multi-unit residential purposes. This needs to be contrasted with a Conventional Subdivision, as evidenced by the 'Yield Plan', in which all land resources would still be exhausted (home-sites, roadway infrastructure, etc.) and yet not a single affordable housing unit realized.

(V) *"Whether the proposed land developments or subdivisions lots will have adequate and permanent physical access to a public street in accordance with the requirements of Section 45-23-60(a)(5), or the local review board has approved other access, such as a private road."*

All proposed residences will have permanent and physical access from several vantage points, to include Tiogue Avenue, East Shore Drive, Minglewood Drive, and Tiffany Road.

(VI) *"Whether the proposed development will result in the creation of individual lots with any physical constraints to development that building on those lots according to pertinent regulations and building standards would be impracticable, unless created only as permanent open space or permanently reserved for a public purpose on the approved, recorded plans."*

There does not appear to be any constraints to developing the Property in the manner so proposed, considering the entire Property is comprised of upland resources. Furthermore, all requisite public infrastructure will be properly introduced, to include an appropriate roadway network. And once again it must be emphasized, as has been evidenced by the prepared 'Yield Plan, that unlike a by-right conventional development, there would not be a single affordable housing unit generated.

CONCLUSION

It is the professional opinion of this Consultant that the proposed development, in the manner so-described, is consistent with both the Housing Plan and Comprehensive Plan; setting forth the respective Policies, Goals and Objectives. My professional opinion is based upon the manner in which the development will be appropriately integrated into the surrounding mixture of Medium and High-Density residential neighborhood(s). The Planning Board should carefully consider the many benefits posed by the applicant's development, not the least of which is the provision of much-needed affordable owner-occupied housing.