



TOWN OF COVENTRY, RI  
DEPARTMENT OF PLANNING & DEVELOPMENT

## STAFF REPORT

<b>Project Name:</b>	<b>Coventry Centre</b>
<b>Plan Type:</b>	Major Land Development with associated Zone Change
<b>Plan Review Phase:</b>	Master Plan
<b>Owners:</b>	Bernard L., Liv T., and Christopher LeFoley (Lot 23) David T. & Christine Olton (Lot 24)
<b>Applicant:</b>	Starr Capital, LLC
<b>Address:</b>	666 Arnold Rd (Lot 23) and 2271 New London Turnpike (Lot 24)
<b>Plat / Lot / Zone:</b>	<b>AP 7 Lots 23 and 24 Zone I-1 Lot Size 17 acres</b>
<b>Existing Use:</b>	Single-family house
<b>Proposed Use:</b>	Commercial (Lot 23) and Multifamily Residential (Lot 24)
<b>Description:</b>	Applicant proposes to develop a commercial project on Lot 23 and a multifamily residential project on Lot 24. The commercial project would include 48,000 GSF of commercial space, with a mix of retail, restaurant, drive-thru, and gas station/convenience store uses. The multifamily residential project would include 218 units across four buildings, 18% of which would be deed-restricted as affordable housing. This proposal includes a corresponding Zone Change Application which will be subject to a recommendation by the Planning Commission and ultimately decided by the Town Council.

***Please note that this Staff Report represents an updated version of the report which was submitted to the Planning Commission in advance of its July 23, 2025 meeting, when the Public Hearing for this project was initially opened. The Hearing was kept open and the matter was continued to the August 27, 2025 meeting. This version of the report is intended to replace the previous report in order to provide all relevant planning analysis, findings, and staff recommendation herein.***

### **I. PROJECT INFORMATION**

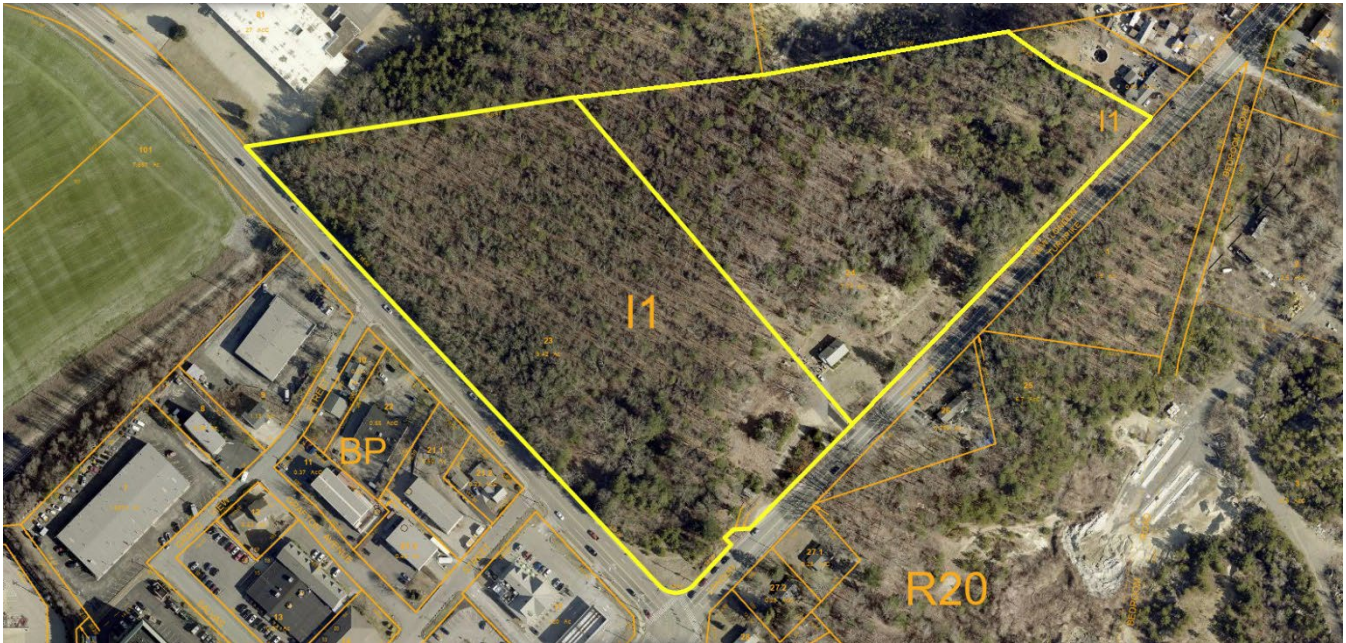
#### **Background**

This item is again before the Planning Commission as a Master Plan Application for a proposed Major Land Development with a Zone Change of a 17-acre subject parcel comprised of two lots: AP 7, Lots 23 (8.6 acres) and 24 (8.4 acres). At that time, the applicant shared two conceptual site plans, one all-commercial and another mixed-use (residential and commercial), but both of which would redevelop the subject parcel as a single site. For this Master Plan application, the applicant has instead proposed

to develop the subject parcel's two constituent lots as separate projects, segregating commercial development to Lot 23 and multifamily residential development to Lot 24.

The applicant has submitted a draft Traffic Study, Parking Analysis, Fiscal Impact Study, Planning Report, Lighting Narrative, and proposed Ordinance in support of its Master Plan application. Staff anticipates the applicant will submit a formal Lighting Plan and formal architectural renderings with its Preliminary Plan application.

### Existing Conditions



The subject parcel forms a large wedge on the inside angle formed by the corner of Arnold Road and New London Turnpike. Lot 23 is a corner lot with just over 1,000 feet of frontage along Arnold Rd and an additional 400 feet of frontage on New London Turnpike. Lot 24, for its part, features about 750 feet of frontage on New London Turnpike.

Both lots are zoned I-1 (Industrial) and largely consist of wooded, undeveloped land. One single-family house can be found near the southernmost corner of Lot 24; two dilapidated outbuildings stand nearby along New London Turnpike on Lot 23.

As noted in the plan set, the subject parcel lies within Flood Zone X. There are no wetlands or watercourses on or within 200 feet of the perimeter of the subject parcel, and the parcel does not lie within a groundwater protection area. However, the parcel does fall within the overlay of a Natural Heritage Area. Additionally, a RIDEM permit will be required because the project will disturb more than one acre of land.

**Zoning Summary Chart (Existing)**

Zoning District(S)	Overlay District(S)	5-1 (Industrial)
Zoning Regulation Requirements	Existing	Required
MINIMUM LOT AREA	10,000 SF	10,000 SF
FRONTAGE	2,000 FT	100 FT
MINIMUM FRONT SETBACK	50 FT	50 FT
MINIMUM SIDE SETBACK	20 FT	20 FT
MINIMUM REAR SETBACK	20 FT	20 FT
MINIMUM BUILDING HEIGHT	10 FT	10 FT
MINIMUM IMPERVIOUS	10%	10%
MINIMUM PARKING SETBACK	10 FT	10 FT
MINIMUM OPEN SPACE	10%	10%

**General**

- EXISTING DIMENSIONAL INFORMATION IS REPRESENTATIVE OF THE NEW LONDON TURNPIKE AND IS NOT LISTED SEPARATELY BY PARCEL.
- ZONING REGULATION REQUIREMENTS AS SPECIFIED IN TOWN OF COUNTRY ZONING BYLAW.
- LANDSCAPE BUFFER REQUIREMENTS VARY BY PROPOSED USE AND ADJACENT USE. SETBACK TO 50 FT FOR MINIMUM LANDSCAPE BUFFER REQUIREMENTS.
- NO BUILDING SETBACK IS REQUIRED ADJACENT TO AN ARTERIAL ROAD FOR THE TOWN OF COUNTRY ZONING AND LAND DEVELOPMENT REGULATIONS (ZONING SETBACK MAY BE REDUCED WITH A VARIANCE).
- A 300' BUILDING SETBACK FROM RESIDENTIAL ZONES IS REQUIRED FOR COMMERCIAL DEVELOPMENT PER ZONING SETBACK MAY BE REDUCED WITH A VARIANCE.

**Zoning Summary Chart (Proposed)**

Zoning District(S)	Overlay District(S)	Cowen Centre Planned District
Zoning Regulation Requirements	Proposed	Provided
MINIMUM LOT AREA	10,000 SF	10,000 SF
FRONTAGE	2,000 FT	100 FT
MINIMUM FRONT SETBACK	50 FT	50 FT
MINIMUM SIDE SETBACK	20 FT	20 FT
MINIMUM REAR SETBACK	20 FT	20 FT
MINIMUM BUILDING HEIGHT	10 FT	10 FT
MINIMUM IMPERVIOUS	10%	10%
MINIMUM PARKING SETBACK	10 FT	10 FT
MINIMUM OPEN SPACE	10%	10%

**General**

- DIMENSIONAL INFORMATION IS REPRESENTATIVE OF THE NEW LONDON TURNPIKE AND IS NOT LISTED SEPARATELY BY PARCEL.
- ZONING REGULATION REQUIREMENTS AS SPECIFIED IN TOWN OF COUNTRY ZONING BYLAW.
- PER PROPOSED PLANNED DISTRICT.
- BUILDING HEIGHT MAY BE INCREASED TO A MAXIMUM OF 65 FEET FOR BUILDINGS SET BACK A MINIMUM OF 300 FEET FROM NEW LONDON TURNPIKE.

**Legend**

- OPEN SPACE

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allocation could evolve as the project progresses, and individual buildings could potentially host more than one user. A total of 192 parking spaces would be provided for the commercial development on Lot 23. A small “plaza/amenity space” is proposed at the corner of Arnold Road and New London Turnpike, the subject parcel’s primary visual focal point.

Site access to Lot 23 would be achieved via two points of ingress/egress on Arnold Road and one on New London Turnpike, adjacent to the shared lot line with Lot 24. “Road 1” would be aligned with Grandview Street at its northern end to create a four-way intersection on Arnold Road, while “Road 2” would be aligned to create a four-way intersection with Gay Street and re-emerge on New London Turnpike. Both of Road 2’s intersections would limit ingress/egress to right-turn only to minimize potential impacts to the busy Arnold/New London intersection.

The project on Lot 24 would construct 218 multifamily residential units (18% of which would be deed-restricted as affordable housing) distributed across four buildings. Buildings 10, 11, and 12 would each be four stories tall and contain either 56 (Buildings 11 and 12) or 66 (Building 13) units. In contrast, Building 13 (located closest to New London Turnpike) would be three stories tall and contain 40 units. A total of 327 parking spaces would be provided for the multifamily residential development on Lot 24. Buildings 10, 11, and 12 would be arranged around a triangular, landscaped courtyard at the center of the lot. Site access to Lot 24 would be achieved through a single point of ingress/egress on New London Turnpike near the far end of Lot 24 from the busy Arnold/New London intersection. A small pedestrian walkway adjacent to Building 10 constitutes the only form of inter-parcel access the applicant has proposed.

As noted in the Background section of this report, the applicant submitted a Traffic Impact and Access Study (prepared by VHB) in May 2025. This study was designed not only to examine the traffic impacts of the development program for the subject parcel itself, but also to quantify the overall growth in traffic volumes anticipated in and around the Centre of New England Blvd. region. This is critical given the substantial amount of residential and commercial development occurring in this corner of Coventry, for the purposes of both identifying necessary infrastructure improvements and for understanding the relative share of each project’s contribution to the overall traffic growth that warrants the improvements.

The Town engaged Pare Corporation to conduct a peer review of the applicant’s Traffic and Parking Studies. The Study’s framework and methodology were deemed appropriate for the desired scope, but several important deficiencies in the initial version of the Study were identified by the peer reviewer in a letter dated July 11, 2025, namely the lack of a traffic safety study with firm crash data and the omission of several significant proposed developments from the No Build baseline on which future traffic projections were based.

Following additional discussions between the applicant, peer reviewer, and Town, as well as input provided by the Technical Review Committee at its July meeting, the applicant submitted a revised Study on August 5, 2025 that included more robust safety data, expanded No-Build assumptions, and other miscellaneous edits. Additional supplemental data was submitted for review on August 14<sup>th</sup>; following review of the updated Study and supplemental data, the peer reviewer confirmed that the Study was complete and performed in accordance with industry standards in a letter dated August 19, 2025.

As relayed in the August 19<sup>th</sup> peer review letter, the applicant has agreed to assume responsibility for “all work associated with Arnold Road and the New London Turnpike/Arnold Road intersection, and approaches.” This comment is in reference to the following improvements named in the Traffic Study:

- Installation of sidewalks along the subject parcel’s Arnold Road and New London Turnpike frontages;
- Widening of New London Turnpike’s southbound approach to the intersection with Arnold Road, to increase the lengths of the left-turn storage lane and shared through/right-turn lane to accommodate projected queues;
- Optimization of traffic signal timings and offsets at the Arnold/New London intersection; and
- Slight widening of Arnold Road to support two westbound departure (from the intersection with New London Turnpike) lanes as far north/west as the intersection with Grandview and “Road 1,” with the outer lane striped and signed as right-turn only into the subject parcel.

While the Study identified other opportunities for traffic improvements within the overall study area, these will be the subject of further study and improvement between the Town, RIDOT, and other applicants. As expressed by the peer reviewer, “Based on the size of the proposed development and the traffic being generated, Pare is of the opinion that the off-site improvements being proposed by the developer are satisfactory.”

### **Zoning (Proposed Ordinance)**

This proposal relies upon a companion Zone Change ordinance which proposes to re-designate Lots 23 and 24 as a Planned Development District (PD) entitled “Coventry Centre Planned District” featuring a slate of residential and commercial uses, as well as new dimensional standards, which are distinct from the existing dimensional/use regulations associated with the subject parcel’s current I-1 zoning.

The proposed ordinance has been written to allow for a degree of flexibility in how the applicant chooses to balance residential and commercial development on both Lots 23 and 24 in case market conditions favor an approach to developing both parcels as a unified project akin to the concepts floated during the Pre-Application phase.

This flexibility is primarily facilitated by Gross Floor Area standards applying collectively to Lots 23 and 24: a maximum of 120,000 SF of non-residential GFA is allowed; for each residential unit, the maximum



non-residential GFA is reduced by 200 SF; and the number of residential units is capped at 600. Parking requirements are proposed as a minimum of 4 spaces per 1,000 SF of gross floor area for non-residential uses and 1.5 spaces per (residential) dwelling unit.

Planning Staff generally support the proposed dimensional and use regulations and feel that the subject parcel is better-suited to host residential and commercial uses rather than industrial uses. Staff notes that the applicant intends to propose minor revisions to a few dimensional standards elaborated in the version of the proposed ordinance that was submitted to the Town Council for a First Reading on July 22, 2025.

The proposed ordinance includes a brief section discussing architectural standards which states, among other things, that the buildings shall be designed with traditional roof forms and use natural materials for the buildings' exteriors. Planning Staff seek the Commission's guidance as to whether the proposed architectural standards should apply to both Lots 23 and 24, or only Lot 23 (as the more visible of the two). Staff raises this question because the ordinance contains two caveats: that parapets and faux roofs may be used to screen flat roofs, and that metal may be used as an exterior material for decorative purposes. Staff understands the applicant believes that the multifamily buildings on Lot 24 must have flat roofs and desires to install decorative metal panels on the exterior of these buildings; the question Staff poses to the Commission is whether a building featuring faux rooflines and modern metal siding accents would constitute enough of an aesthetic departure from the overall intent of the architectural standards that the inclusion of these standards would have little influence over the final development's appearance in the first place.

### **Interdepartmental Review and Comments**

Please see the attached report from the Technical Review Committee (dated July 14, 2025) for interdepartmental comments on this application. In response to the comments received in July, the applicant submitted an updated Traffic Impact and Access Study. Those members of the Technical Review Committee with outstanding traffic-related concerns at the time of the July meeting submitted follow-up comments in August regarding the updated Traffic Study. These are as follows:

1. Benjamin Witt, Coventry Police Chief, via email dated August 20, 2025

"The police department has no further comments or concerns with the traffic information provided at this stage based on positive peer review letter received on 8/20/25."

2. Joseph Levesque, P.E., Town Engineer, via phone on August 21, 2025

"After review of the updated traffic study and peer review letter, Engineering has no remaining concerns at this time."

## II. MAJOR LAND DEVELOPMENT

### Findings of Fact

Staff has conducted an orderly, thorough, and expeditious technical review of this Master Plan application for conformance with required standards set forth in RIGL Section 45-23-60, as well as in the Town of Coventry's Subdivision and Land Development Regulations, and finds as follows:

*RIGL § 45-23-60. Procedure – Required findings. (a)(1) states, “The proposed development is consistent with the comprehensive community plan and/or has satisfactorily addressed the issues where there may be inconsistencies.”*

1. The Comprehensive Plan's Future Land Use designation for the subject parcel is Business Park. The proposed development is consistent with several key aspects of the Comprehensive Plan's intent for the Business Park land use designation, namely that development would be coordinated across multiple sites, with less intense (multifamily residential) uses serving to buffer more intense (commercial) uses from the surrounding area.

*RIGL § 45-23-60. Procedure – Required findings. (a)(2) states, “The proposed development is in compliance with the standards and provisions of the municipality's zoning ordinance.”*

2. The subject parcel is zoned I-1 (Industrial).
3. Master Plan approval is conditioned upon Town Council approval of a companion Zone Change application which would explicitly define the proposed uses as permissible in the proposed Coventry Centre Planned District and would establish a new by-right minimum parking standard.
4. The proposal will not alter the general character of the surrounding area or impair the intent or purpose of the Coventry Zoning Code.

*RIGL § 45-23-60. Procedure – Required findings. (a)(3) states, “There will be no significant negative environmental impacts from the proposed development as shown on the **final** plan, with all required conditions for approval.” (emphasis added)*

5. This finding pertains specifically to the final plan; however, no significant environmental impacts are anticipated based on the Master Plan level of detail required at this stage.
6. The June 2025 update of the Rhode Island Natural Heritage map shows that the subject parcel falls within a Natural Heritage Area overlay.

*RIGL § 45-23-60. Procedure – Required findings. (a)(5) states, “All proposed land developments and all subdivision lots have adequate and permanent physical access to a public street. Lot frontage on a public street without physical access shall not be considered in compliance with this requirement.”*

7. The full subject parcel enjoys adequate permanent physical access to two public rights-of-way (Arnold Road and New London Turnpike).
8. The development will provide for safe and adequate circulation for vehicular traffic as well as for emergency vehicles.

## **Recommendation**

Staff finds this proposal consistent with the standards for required findings of fact set forth in RIGL Section 45-23-60 as well as with the Town of Coventry's Subdivision and Land Development Regulations. Staff therefore recommends that the Planning Commission adopt the documented findings of fact and **approve** the Master Plan application, subject to the conditions denoted below.

## **Conditions of approval**

1. Consistent with the proposed ordinance establishing the Coventry Centre Planned District, 18% of all residential units constructed through this project shall be deed-restricted as affordable housing. The applicant shall establish a schedule for proposed locations and timing of construction of all LMI units at the Preliminary Plan phase of review.
2. The applicant shall be responsible for advancing the design and eventually funding the construction of all work associated with the Arnold Road/New London Turnpike intersection and those portions of both public rights-of-way adjacent to the subject parcel that were identified in the Traffic Study and associated Peer Review.
3. In lieu of constructing sidewalks along the full length of the Lot 23's Arnold Road frontage, the applicant shall truncate the Arnold Road sidewalk at the intersection with proposed "Road 1," about 350 feet south of the shared lot line with AP 15, Lot 81, and instead complete the roughly 300-foot gap in the New London Turnpike sidewalk network by building sidewalks in front of AP 16, Lots 1 and 2 as an off-site improvement.
4. Prior to submitting its Preliminary Plan application, the applicant shall coordinate with Planning Staff regarding the following details:
  - a. Potential transfer of property from the subject parcel to the Town to widen the public right-of-way for the purpose of accommodating lane widenings, walkways, and/or other forms of traffic mitigation
  - b. Logical crosswalk treatments near termini of the future sidewalks on Arnold Road and New London Turnpike
  - c. Feasibility of constructing the proposed sidewalks along the subject parcel's Arnold and New London frontages as shared-use paths to provide bicyclists a safer means of traveling through the busy Arnold/New London intersection than sharing the roadway lanes
  - d. Sufficient provisions for intra- and inter-parcel access for pedestrians and/or cyclists



- e. Options for improving the existing RIPTA Route 23 northbound stop (corner of Arnold Rd and Gay St) to promote public transit access to the subject parcel
5. The applicant shall submit the following items with its Preliminary Plan application:
  - a. Soil Erosion and Sedimentation Control (SESC) application
  - b. Lighting Plan
  - c. Formal architectural renderings of all proposed buildings
  - d. Water Supply Study
  - e. Schedule for proposed locations and timing of construction of all LMI units
  - f. Proposed designs for Arnold Road/New London Turnpike intersection improvements
6. The Engineer of Record shall submit a Certificate of Conformance (COC) prior to issuance of Certificates of Occupancy for the proposed buildings.
7. Upon project completion, a Certificate of Conformance (COC) from the Engineer of Record (EOR) shall be required. The COC shall certify that the constructed project meets all required standards, regulations and specifications in the permitting and construction documents. The COC shall be focused on site civil related work. Work includes, but is not limited to; all drainage system components, earth grading, roadway subbase, pavement and curbing, concrete flatwork, underground utilities (sewer, electric, water, etc.), survey markers and monuments, fire cisterns, signage, fencing and landscaping. EOR shall partner with a qualified sub-consultant to perform necessary inspection related duties if EOR does not perform these duties in-house. All coordination between EOR and inspection sub-consultant shall be finalized before construction commences. A certificate of occupancy will not be issued until COC is received and accepted by the town.

### **III. ZONE CHANGE**

#### **Context**

Although the ultimate authority to amend a municipal Zoning Ordinance resides with that municipality's Town Council, R.I. Gen. Laws § 45-24-51 ("Adoption – Review by planning board or commission.") establishes that the Planning Commission's role in the process begins upon referral of proposed amendments, and describes that role as follows: "...The planning board or commission shall, in turn, notify and seek the advice of the city or town planning department, if any, and report to the city or town council within forty-five (45) days after receipt of the proposal, giving its findings and recommendations as prescribed in § 45-24-52."

#### **Findings of Fact**

Staff has conducted an orderly, thorough, and expeditious review of this proposed ordinance for conformance with required standards set forth in RIGL Section 45-24-52, as well as in the Town of Coventry's Comprehensive Plan and Zoning Code, and finds as follows:

*RIGL § 45-24-52 ("Adoption – Review by planning board or commission.") states that, "Among its findings and recommendation to the city or town council with respect to a proposal for adoption, amendment, or repeal of a zoning ordinance or zoning map, the planning board or commission shall:"*

*"(1) Include a statement on the general consistency of the proposal with the comprehensive plan of the city or town, including the goals and policies statement, the implementation program, and all other applicable elements of the comprehensive plan; and*

1. The applicant has established through its submitted Planning Report and other application materials that the proposed ordinance is generally consistent with the intent of the Comprehensive Plan.

*"(2) Include a demonstration of recognition and consideration of each of the applicable purposes of zoning, as presented in § 45-24-30."*

2. As established by the materials submitted by the applicant in support of this application, the proposed ordinance would be consistent with the applicable purposes of zoning as presented in § 45-24-30 – for example, § 45-24-30 (a)(2), which lists one purpose of zoning as "Providing for a range of uses and intensities of use appropriate to the character of the city or town and reflecting current and expected future needs."

## **Recommendation**

Staff finds Proposed Ordinance 2025-19 consistent with the standards for required findings of fact set forth in RIGL Section 45-24-52 as well as with the Town of Coventry's Comprehensive Plan and Zoning Code. Staff therefore recommends that the Planning Commission adopt the documented findings of fact and forward a ***positive*** recommendation to the Town Council, inclusive of the proposed revisions submitted by the applicant for informational purposes to the Planning Commission.



## TOWN OF COVENTRY

Department of Planning & Development  
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### TECHNICAL REVIEW COMMITTEE REPORT

**DATE:** July 14, 2025  
**PROJECT NAME:** "Coventry Centre"  
**PROPERTIES:** AP 7, Lots 23 & 24  
**ADDRESS:** 666 Arnold Road (Lot 23) and 2271 New London Turnpike (Lot 24)  
**ZONE:** I-1 (Industrial)  
**OWNER:** Bernard L., Liv T., and Christopher LeFoley (Lot 23); David T. & Christine Olton (Lot 24)  
**APPLICANT:** Starr Capital, LLC

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This matter came before the Coventry Technical Review Committee at its July 14, 2025 meeting as a Master Plan Application for a Major Land Development project with an associated Zone Change in accordance with Article V, § D.4. of the Coventry Subdivision & Land Development Regulations.

An application and plan were initially submitted for review on May 30, 2025. The applicant proposes to develop a commercial project on Lot 23 and a multifamily residential project on Lot 24. The commercial project would include 48,000 GSF of commercial space, with a mix of retail, Page 1 of 2 restaurant, drive-thru, and gas station/convenience store uses. The multifamily residential project would include 218 units across four buildings, 18% of which would be deed-restricted as affordable housing. This proposal includes a corresponding Zone Change Application which will be subject to a recommendation by the Planning Commission and ultimately decided by the Town Council.

The members of the Technical Review Committee reviewed the following documents related to this application when preparing the comments below:

Coventry Centre - Traffic Impact and Access Study - May 2025.pdf  
Coventry Centre - Comp Plan Consistency Analysis dated 2025-07-02.pdf  
Coventry Centre - Fiscal Impact Statement - April 2025.pdf  
Coventry Centre - KCWA Water Availability Letter dated 2025-04-25.pdf  
Coventry Centre - Lighting Narrative dated 2025-07-01.pdf  
Coventry Centre - Master Plan Set dated 2025-05-30.pdf  
Coventry Centre - Parking Assessment dated 2025-05-30.pdf  
Coventry Centre - Proposed Ordinance Establishing Planned District.pdf

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#### TOWN ENGINEER

General

- 1) Upon project completion, a Certificate of Conformance (COC) from the Engineer of Record (EOR) shall be required. The COC shall certify that the constructed project meets all required standards, regulations and specifications in the permitting and construction documents. The COC shall be focused on site civil related work. Work includes but is not limited to; all drainage system components, drainage related to retaining wall placement, earth grading, roadway subbase, pavement, concrete flatwork, underground utilities (sewer, electric, water, etc.), survey markers and monuments and fire cisterns. EOR shall partner with a qualified sub-consultant to perform necessary inspection related duties if EOR does not perform these duties in-house. All coordination between EOR and inspection sub-consultant shall be finalized before construction commences. Separate COCs shall be required from the Structural Engineer of Record (SEOR) and the Geotechnical Engineer of Record (GEOR) as applicable. A certificate of occupancy will not be issued until COCs are received and accepted by the town.

#### Plans

- 1) Submission of a Town of Coventry Soil Erosion and Sediment Control (SESC) Application will be required for the project.
- 2) A Town of Coventry Sewer Connection Application will be required for the proposed sewer connection.
- 3) Stormwater management shall be provided for the site and meet state and town requirements.

#### Parking Assessment

- 1) Engineering takes no exception to the proposed multifamily residential parking reduction.

#### Traffic Study

Consistent with the planning staff comments, the engineering department is anticipating updates to the existing traffic study prepared by VHB. Once a revised study is received, comments will be provided.

#### PRINCIPAL PLANNER DESIGNEE

- This proposal relies upon a companion Zone Change ordinance which proposes a slate of residential and commercial uses, as well as new dimensional standards, which are distinct from the existing dimensional and use regulations associated with the subject parcel's current I-1 (Industrial) zoning. The proposed ordinance has been written to allow for a degree of flexibility in how the applicant chooses to balance residential and commercial development in case market conditions favor some uses over others. This is primarily facilitated by Gross Floor Area standards applying collectively to Lots 23 and 24: a maximum of 120,000 SF of non-residential GFA is allowed; for each residential unit, the maximum non-residential GFA is reduced by 200 SF; and the number of residential units is capped at 600. It should be noted this immediate Master Plan application is seeking 218 housing units and 48,000 SF of commercial space. Planning Staff generally support the proposed dimensional and use regulations and feel that the subject parcel is better-suited to host residential and commercial uses rather than industrial uses.
- Consistent with initial feedback from the Town's contracted peer reviewer for traffic and parking issues, the applicant's Traffic Study should be revised to include all proposed developments in the region as part of their analysis of No-Build Conditions.
- Consistent with initial peer reviewer feedback, the applicant's Traffic Study should also be revised to incorporate a traffic safety study with crash data to understand whether any operational or geometric conditions may warrant design solutions.

- Following receipt of the revised Traffic Study, Planning Staff and the peer reviewer will provide more detailed comments regarding the overall traffic analysis as well as the proposed roadway and intersection improvements that will be needed at the intersection of New London Turnpike and Arnold Road. Staff notes that the proposed widening of adjacent roadway segments near the intersection of New London Turnpike and Arnold Road would likely be accommodated through transfer of property from the subject parcel to the public right-of-way. Planning Staff anticipates the applicant, along with other developers in the immediate vicinity, will continue to coordinate with the Town regarding off-site traffic improvements/mitigations.
- Planning Staff agrees with the peer reviewer's suggestion to update the Traffic Study roughly six months after the Centre of New England Boulevard connection is completed by conducting new traffic counts to confirm accuracy of the current Study's post-connection traffic distribution estimates. The updated Study can be provided with the Preliminary Plan submittal.
- Planning Staff believes that promoting non-motorized means of transportation (pedestrian, bicycle, and bus) through practical infrastructure improvements will be critical to minimizing motorized traffic impacts, such as increased roadway congestion, to the greatest extent possible. The applicant's Traffic Study proposes to install sidewalks along the full lengths of the subject parcel's Arnold Road and New London Turnpike frontages. The existing sidewalks end 1,000 feet away from the subject parcel on Arnold Road, and (post-construction of the Willow Lakes development) 300 feet away from the subject parcel on New London Turnpike. Staff proposes the applicant truncate its proposed Arnold Road sidewalk about 350 feet before the end of the parcel's frontage, and instead complete the 300-foot gap in the New London Turnpike sidewalk network by building sidewalks in front of AP 16, Lots 1 and 2 as an off-site improvement.
- The applicant shall coordinate with Planning Staff regarding logical crosswalk treatments near termini of the future sidewalks on Arnold Road and New London Turnpike prior to submitting the Preliminary Plan application.
- Prior to submittal of the Preliminary Plan application, the applicant shall evaluate the feasibility of constructing the proposed sidewalks along the subject parcel's Arnold and New London frontages as shared-use paths to provide bicyclists a safer means of traveling through the busy Arnold/New London intersection than sharing the roadway lanes.
- The applicant shall coordinate with Planning Staff prior to the submittal of the Preliminary Plan application to ensure the proposed internal pathways provide for sufficient intra- and inter-parcel access for pedestrians and/or cyclists.
- The applicant shall coordinate with the Town and RIPTA while developing its Preliminary Plan application to explore options for improving the existing RIPTA Route 23 northbound stop (corner of Arnold Road and Gay Street) to promote public transit access to the subject parcel.
- Planning Staff anticipates receiving architectural examples/visuals with the Master Plan application to inform the architectural standards proposed in the draft ordinance. Following submittal of same, Staff will seek the Planning Commission's guidance as to whether the proposed architectural standards should apply to both Lots 23 and 24, or only Lot 23 (as the more visible of the two).
- A formal Lighting Plan and formal architectural renderings are anticipated to be submitted with the Preliminary Plan application.

#### PUBLIC WORKS DIRECTOR

- Concrete sidewalks should extend northerly on New London Turnpike to include AP 16, Lots 1 and 2 to complete the sidewalk connection on that side of the road.

- Extend the merge lane on Arnold Road further to the west as “Road #1” will create an issue with entering/exiting traffic on Arnold Road @ Gay Street.

#### FIRE REPRESENTATIVE

- A water supply study will be required to confirm there is adequate water flow to handle fire protection for the entire proposed complex.

#### POLICE CHIEF

- The Police Department is awaiting a traffic study and peer review prior to making any comments.

#### PLANNING COMMISSION CHAIR

*The Planning Commission Chair recused as this item will be heard before the Planning Commission.*