



**TOWN OF COVENTRY, RI
DEPARTMENT OF PLANNING & DEVELOPMENT**

STAFF REPORT

Project Name:	Coventry Crossings Mixed Use Development
Project Type:	Major Land Development/Comprehensive Permit Application
Plan Review Phase:	Preliminary Plan Application
Owner:	John Koszela & William Eccleston Rev Trust Et Al
Applicant:	Kreg New Homes, LOC
Address:	Harkney Hill Road and Nooseneck Hill Road
Plat / Lot / Zone:	AP 10 Lot 29 & AP 18 Lot 86, Zone GB-1/SPD & R-20; Lot Size 30.3 acres
Existing Use:	Vacant Land
Proposed Use:	Proposed 120-Unit Residential Development with Commercial Uses
Description:	The Applicant proposes to build a mixed-use development comprised of 60 single-family units, 60 two-family units (120 units total), and one commercial pad site comprising 12,500 GSF.

Background

The applicant is proposing a Preliminary Plan Application for a Comprehensive Permit/Major Land Development for a mixed-use development consisting of 120 residential units with 25% of the units as low- & moderate-income housing (LMIH), as well as 12,500 GSF of commercial space. The applicant received Master Plan approval at the Planning Commission meeting on October 18, 2023.

Site and Existing Conditions

The site is comprised of two vacant parcels that have historically been used as a cornfield. The site is approximately 30.3 acres in size (AP 10, Lot 29 is comprised of 29 acres and AP 18, Lot 86 is comprised of 1.3 acres). The site has frontage on Nooseneck Hill Road, Harkney Hill Road, and Hill Farm Road. Lot 29 (which comprises the majority of the site) is zoned General Business 1 with a “Special Planning District Overlay,” and Lot 86 is zoned R20. The property is within Flood Zone “X” (minimal flooding) and is not within a historic district. Public water is available to the site. A replicated wetland area (RIDEM File No. 94-0525) is present in the northeastern portion of the property. A wetland delineation performed on June 14, 2022 classifies this replicated wetland area as a Pond < 1/4 acre. Current freshwater wetland regulations assign a 100-foot Jurisdictional Area and 25-foot buffer zone to this wetland area. The site has access to a private sewer system in Leisure Way, which discharges into the public system at the Woodland Drive Pump Station. The surrounding area is primarily comprised of commercial uses along

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Nooseneck Hill Road with single family homes (Wood Estates) located directly behind the proposed development.



Proposed Conditions

This matter is before the Planning Commission for a Comprehensive Permit/Major Land Development review. The proposed development has been revised since the Planning Commission approved the Master Plan Application on October 18, 2023, with a reduction in the number of single-family dwellings and the inclusion of an OWTS in the place of connection to the sewer system. The Preliminary Plan proposal contains a total of 120 residential units, reduced from 142, with a commercial site totaling 12,500 GSF. Of the 120 residential units, 60 units will be single-family dwellings and 60 units will be two-family dwellings. A total of 25% of the residential units will be deed restricted as LMIH units. The proposal is seeking to subdivide the overall property into 2 separate parcels, one of which will host the residential units (Parcel A), and another will host the commercial component and associated parking (Parcel B). This Application will be reviewed under the Comprehensive Permit Application Process.

Comprehensive Permit Process

The action is brought pursuant to the provisions of R.I.G.L. §45-53-3(2) et seq. (the so-called “Low- & Moderate-Income Housing Act”).

The Rhode Island Low- and Moderate-Income Housing Act was enacted “to provide for housing opportunities for low- & moderate-income individuals and families in each city and town of the state...”

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¹ The Act further provides that a municipality must have a minimum of ten percent (10%) of its housing stock for low- & moderate-income individuals and families.

In 2004, the General Assembly amended the Act so as to require cities and towns to develop an Affordable Housing Plan for their individual communities which would thereby constitute a part of the Comprehensive Plan. The amended Act further provided that a municipality may develop its own Comprehensive Permit for issuance of an Affordable Housing Permit. Failure to do so could result in the municipality being required to approve all low- & moderate-income housing applications without regard to the timing of submissions in order to meet the 10% threshold.

The Town of Coventry developed and adopted an Affordable Housing Plan that was approved by the State in 2005. By the terms of the Plan the Town must achieve the State's mandate of ten percent (10%) low- and moderate-income housing stock.

At the time of its adoption, the Town had 3.76% of its housing stock identified as "Low- or Moderate-Income Housing." Currently, approximately 5.32% of Coventry's housing stock is categorized as 'low or moderate income' housing. To be sure, this increase in fifteen (15) years in low/mod income housing is largely attributable to new development approvals.

The Comprehensive Permit Ordinance enacted pursuant to State law provides for a single forum to act on all forms of land use relief as relates to low- and moderate-income housing. More particularly, State law provides,

The local review board (Planning Commission) has the same power to issue permits or approvals that any local board or official who would otherwise act with respect to the application...²

The Rhode Island Supreme Court has upheld said statute by ruling that the local review board in considering an application for low- or moderate-income housing,

...is vested with the same power and authority as the various local boards, including the city or town council. Town of Coventry v. Omni, 814 A2d 889, 897 (R.I. 2003).

For Coventry, that forum is the Planning Commission. As such, the Planning Commission in a Low- and Moderate-Income housing matter has the exclusive authority to grant a zone change (normally reserved to the Town Council), Variance, or Special Use Permit (normally reserved for separate applications seeking zoning relief) as well as those matters typically reserved to the Planning Commission.

In order to be eligible for consideration for approval as a Comprehensive Permit, an applicant under the Low- and Moderate-Income Housing Act must propose a development that has at least 25% low- or moderate-income housing.

¹ R.I.G.L. § 45-53-2

² R.I.G.L. § 45-53-4(G)(iv)

Although the procedures to be followed are similar to typical Planning Commission actions (i.e. Major Subdivision with a Master Plan approval, Preliminary Plan approval and Final Plan approval), the appellate process and the basis for approval & denial are different and distinct.

For instance, typically, an appeal from an adverse Planning Commission decision would be to the Zoning Board of Appeal and a subsequent appeal would be to the Superior Court and ultimately to the Rhode Island Supreme Court. In this case, however, the appeal from an adverse Planning Commission decision lies with an appointed state judge.

In **approving** a Comprehensive Permit, the Planning Commission must make the following *Findings of Fact*:

1. The proposal is consistent with the needs associated in the Town's Comprehensive Community Plan **with particular emphasis on the comprehensive community plan's affordable housing plan...**
2. The proposed development is in compliance with the provisions of the Town's zoning ordinance and subdivisions regulations and/or where expressly varied or waived, local concerns that have been affected by the relief granted do not outweigh the state and local need for low- and moderate-income housing.
3. All low- & moderate-income housing proposed are integrated throughout the development; are compatible in scale & architectural style to the market rate units within the development; and will be built & occupied prior to or simultaneously with the market rate units.
4. There will be no significant negative impact on the health, welfare & safety of current and future residents of the community to include safe circulation of pedestrian and vehicular traffic; provisions are made for emergency services, sewerage disposal, potable water, adequate stormwater runoff and the preservation of natural, historical or cultural features of the community.
5. All proposed land developments projects will have adequate & permanent access to a public way.

That said, in reviewing a Comprehensive Permit, the Planning Commission may **deny** an application for a Comprehensive Permit under the Low- & Moderate-Income Act if:

1. The Town has an approved affordable housing plan and is meeting housing needs.
2. The proposal is not consistent with the local needs identified in the Town's Comprehensive Community Plan.
 - a. **"Consistent with local needs"** means reasonable in view of the State need for low- and moderate-income housing, considered with the number of low-income persons in the town...and the need to protect the health and safety of the occupants of the proposed housing or of the residence (sic) of the...town, to promote better building design in relation to the surroundings, or to preserve open spaces...³

³ R.I.G.L. § 45-53-3(4)

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3. The proposal is not in conformance with the Comprehensive Plan.
4. The community has met or plans to meet the goal of ten percent (10%) of low- & moderate-income housing.
5. Concerns for the environment and the health and safety of current residents have not been adequately addressed.

Comments from Town Department Heads

The Preliminary Plan has been reviewed by the Technical Review Committee (TRC), which includes the Departments of Planning, Engineering, Public Works, Police, and Fire. The comments that these Departments made are included in the Technical Review Committee report attached at the close of this planning staff report. It is worth noting that the applicant has submitted a document that responds to the comments given by the TRC. Some of this supplementary Applicant information, and follow-up staff responses, are addressed specifically in the Planning Staff Analysis section below.

Comments from the Public

No comments about the Preliminary Plan stage of this project have been received at this time. Many public comments were received during the Master Plan stage of application and are still maintained in project files.

Planning Staff Analysis

A Comprehensive Permit application allows the applicant to seek zoning relief and waivers as part of the Planning Commission decision, and does not trigger additional reviews or approvals by other bodies such as the Zoning Board of Review and the Town Council. The applicant has itemized all zoning relief that they are requesting, and these are listed on pg. 9 of the project narrative submitted on August 30, 2024. While the Comprehensive Permit process does allow the applicant to seek such relief, for the Planning Commission to grant such relief as part of the overall project, the commercial components do not share the same protections as the housing components if the project is appealed to the State Housing Appeals Board.

The applicant has made several changes to the plan since its approval at the Master Plan stage. The applicant's previous proposal included a total of 142 residential units comprised of 72 single-family dwellings, 70 multi-family dwellings, and one (1) commercial site totaling 12,500 GSF. The applicant's current proposal includes a total of 120 residential units (comprised of 60 single-family dwellings and 60 two-family dwellings) and continues to include the commercial building, which is unchanged. The applicant has also switched from a sewered development to one that uses an on-site wastewater treatment system (OWTS). The overall effect of the applicant's changes is a slight reduction in the intensity of use on the site, and the switching of the wastewater system. This is a reduction of 22 residential units, or a 15% reduction.

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It is anticipated the project will be served by public water and Kent County Water Authority has issued a letter based on this intent. As the changes made to the project lower the overall unit count, Planning sees no issue here.

The Applicant has stated that while they intend to offer all low- and moderate-income housing (LMIH) units for sale, they have had some trouble in selling all the units they have slotted for LMIH. In this case, the Applicant has stated that they would be willing to change the unsold units from home ownership (at 120% of AMI) to rental units (at 80% of AMI), with the Applicant retaining ownership of the unit. Planning staff do not have a concern with this change in type of LMIH unit, providing that the Applicant follows State guidelines.

Planning staff have suggested that a pedestrian pathway be added to the plan from the northern elbow of "Road C" to the outlet on Wisteria Drive. In response, the Applicant has stated that the people in the units adjacent to the suggested pathway may be negatively impacted by having a pedestrian pathway so close to their homes. Planning staff see value in providing some way of allowing people to walk a shorter route to Wisteria Drive than having to walk down to the proposed mailboxes, but ultimately defer to the Planning Commission on the relative importance of this design change.

Planning staff have sought clarification on the status of the substantial existing tree near the intersection of Nooseneck and Harkney Hill Rds. Staff know this tree has value to the community and would prefer to see that tree saved, if possible. The range of options staff sees are 1) to redesign the southern elbow of "Road A" to preserve the tree in place, 2) relocate the tree to an undisturbed area on the site, or 3) replace the tree with a like species of the largest readily available size in an appropriate place. The Applicant has indicated their preference for option 3. Staff defer to the Planning Commission on their preference as it relates to the options for this specific tree.

Engineering has stated that they do not support asphalt sidewalks, but recommend concrete sidewalks due to the increased durability, increased slip resistance due to its broom finish, reduced heat island effects in higher temperatures, ADA ramps can be formed perfectly in concrete, and the overall greater aesthetic appearance.

It is worth noting that the meeting between the Town's Engineer and the applicant's engineer, as stated in the TRC report, has taken place and the Town Engineer was satisfied with the result of the meeting as it relates to stormwater design and other site design considerations.

Specific conditions related to the Town Engineer's requests are provided at the end of this staff report as part of the proposed decision.

Comprehensive Plan Analysis

Planning staff have reviewed the Town's Comprehensive Plan and the Town's Affordable Housing Plan for policy elements that are relevant to this proposal. This is one of the most critical review items for a Comprehensive Permit as it relates to the required findings under state law. The revised plan addresses the need for affordable housing in both single-family and two-family units, and the plans encourage

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housing that would be available for families and residents of all ages, not just elderly residents. In this regard, the proposal is consistent with meeting the affordable housing needs as articulated within the Town plans.

Additionally, the Comprehensive Plan's Land Use Plan Map identifies this site as being within the Special Planning District designation. The Comprehensive Plan has specific language on its vision for this designation as well as its vision this specific property, as follows:

Page D.1-28:

The Land Use Plan recommends that the Special Planning District overlay the General Business zone on Route 3 at the juncture of Harkney Hill and Nooseneck Hill Roads. Although not inconsistent with the General Business Zone, the Special Planning District does provide for a mix of commercial and residential uses and envisions the implementation of special design standards that would recognize this area as a commercial gateway in Coventry.

Page D.1-19:

The junction of Harkney Hill and Nooseneck Hill Roads plays an important role as a landmark for persons traveling into Coventry. One of the parcels in the area is known by Coventry residents as the "cornfield." The parcels at this intersection are currently zoned for General Business (GB). The Land Use Plan designates this area as a Special Planning District, providing a flexible land use category whose design guidelines take into consideration the special impact this area has on the community, due to its location in a visually prominent part of Town. Development in this area should be designed and sited to encourage internal pedestrian traffic, such as with a traditional village center concept. Strip development is strongly discouraged. A mix of commercial (including retail, services, cultural and educational training institutions, and office) and residential uses are contemplated. Buffering, access, landscaping, lighting and signage must be oriented to accommodate pedestrian traffic within the site and should protect surrounding residences from adverse development impacts.

Based on staff's review of the above-cited Comprehensive Plan language, it is clear there is a focus on maintaining the visual aesthetics of the site, while providing for a mix of possible uses, including residential uses. Specific language on buffering, access, landscaping, lighting, and signage warrant careful consideration of these items. It should be noted the applicant has offered details within their Preliminary Plan submission on proposed access, buffering to abutting residential parcels, landscaping plan, lighting, and signage to address these issues.

Based on staff's review of the Comprehensive Plan, with a focus on the Plan's content regarding affordable housing and the location specific information regarding this area, staff finds that the proposed development is consistent with the Coventry Comprehensive Plan. The proposal addresses the need for affordable housing in both single-family and two-family units, and encourages housing that would be available for families and residents of all ages. The proposed development addresses the Town's affordable housing needs as articulated within the Comprehensive Plan. Further, staff finds that the proposal is consistent with the Comprehensive Plan language that is specific to this area of the Town with regard to buffering, access, landscaping, lighting, and signage. The applicant has provided a

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naturally wooded buffer around the perimeter of the site abutting surrounding residential properties. The applicant has provided a Landscape Plan with significant tree plantings throughout the development. The applicant has provided a conceptual drawing for monument signage at the intersection on Nooseneck Hill Road and Harkney Hill Road with the words “Coventry Crossing – Welcome to Coventry” as well as elevations of both the residential units and the commercial structure.

Traffic Analysis

At the Master Plan submittal, the applicant has provided a Traffic Study (dated April 2023), a revised Traffic Study (last revision dated August), and a specific response letter to the peer review (dated August 10, 2023). The findings from the revised Traffic Study and peer review letter (dated August 2, 2023) still stand. The only change in the plan from the Master Plan stage is a slight reduction in the number of residential units. The conditions from the Master Plan Decision are being carried over to this Preliminary Plan Decision, which state that the commercial use shall not contain any of the following uses, unless supported with sufficient impact analysis, including traffic analysis, than:

- Restaurant or Fast Food Restaurant
- Supermarket
- Convenience Store
- Pharmacy/Drugstore
- Marijuana Dispensary
- Liquor Store
- Coffee/Donut Shop

Findings of Fact

The Commission should carefully consider the revised Preliminary Plan application and supplemental information submitted by the applicant, as well as the additional context provided within this staff report.

Staff offer the following Findings of Fact for the Planning Commission in its consideration of a Preliminary Plan Decision. Findings of Fact must be supported with evidence based on the application materials and the record on this matter. The following staff findings are provided in direct comparison to the required Findings of Fact when approving a Comprehensive Permit.

RIGL § 45-53-4 (a)(4)(v)(A) - The proposed development is consistent with local needs as identified in the local comprehensive community plan with particular emphasis on the community’s affordable housing plan and/or has satisfactorily addressed the issues where there may be inconsistencies.

1. **The proposal is consistent with the Coventry Comprehensive Plan with regard to meeting the affordable housing needs as articulated in the plan and the location-specific vision of this area of Town. The proposal addresses the Plan’s need for affordable housing in both single-family and two-family units, and encourages housing that would be available for families and residents of all**

ages. The proposal addresses the Plan's vision for this specific area of Town (Nooseneck Hill Road and Harkney Hill Road) with substantial plans and information showing improvements and mitigations relating to buffering, access, landscaping, lighting, and signage.

RIGL § 45-53-4 (a)(4)(v)(B) - The proposed development is in compliance with the provisions of the Town's zoning ordinance and subdivisions regulations and/or where expressly varied or waived, local concerns that have been affected by the relief granted do not outweigh the state and local need for low- and moderate-income housing.

- 2. The proposal is in compliance with the provisions of zoning, and where varied the proposal has identified the waivers/relief appropriately. The relief needed does not outweigh the state and local need for affordable housing, as articulated in state law and in the Coventry Comprehensive Plan.**

RIGL § 45-53-4 (a)(4)(v)(C) - All low- & moderate-income housing proposed are integrated throughout the development; are compatible in scale & architectural style to the market rate units within the development; and will be built & occupied prior to or simultaneously with the market rate units.

- 3. All low- and moderate-income housing for this proposal will be integrated and compatible in scale and architectural style to the market rate units. There will be a Condition of Approval to this effect.**

RIGL § 45-53-4 (a)(4)(v)(D) - There will be no significant negative environmental impacts from the proposed development as shown on the final plan, with all required conditions for approval.

- 4. Based on the current Preliminary Plan, there are no anticipated negative environmental impacts from the proposal with engineering designs, details, and mitigations to be demonstrated prior to FINAL PLAN. The Applicant has provided the Town with a fully engineered site plan, Stormwater Management Report, Soil Erosion and Sedimentation Control Plan, and other products that evidence required mitigation of environmental impacts.**

RIGL § 45-53-4 (a)(4)(v)(E) - There will be no significant negative impact on the health, welfare & safety of current and future residents of the community to include safe circulation of pedestrian and vehicular traffic; provisions are made for emergency services, sewerage disposal, potable water, adequate stormwater runoff and the preservation of natural, historical or cultural features of the community.

- 5. The proposal has addressed all impacts relating to health, welfare, and safety of residents. The proposal will not be in conflict with provisions for traffic, emergency services, sewerage disposal, potable water, stormwater runoff, and the preservation of natural, historical or cultural features of the community, where applicable.**

RIGL § 45-53-4 (a)(4)(v)(F) - All proposed land developments and all subdivisions lots will have adequate and permanent physical access to a public street in accordance with the requirements of § 45-23-60(5).

- 6. The proposal will have adequate and permanent physical access to a public street on both Nooseneck Hill Road and Harkney Hill Road.**

RIGL § 45-53-4 (a)(4)(v)(G) - The proposed development will not 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.

- 7. The proposal will not 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.**

Staff Recommendation

Staff finds this proposal consistent with the standards for required findings of fact set forth in RIGL Section 45-53-4 as well as with the Town of Coventry's Zoning Ordinance and Subdivision and Land Development Regulations where applicable. Staff therefore recommends that the Planning Commission adopt the documented findings of fact and **approve** the Coventry Crossings Preliminary Plan application, subject to the waivers and conditions denoted below.

Waivers

The applicant has itemized all zoning relief that they are requesting in the form of waivers, and these are listed on pg. 9 of the project narrative submitted on August 30, 2024.

Conditions of approval

1. The proposed 12,500 SF Commercial Building shall not contain any of the following uses unless supported with sufficient impact analysis, including traffic analysis, at the Final Plan stage:
 - Restaurant or Fast Food Restaurant
 - Supermarket
 - Convenience Store
 - Pharmacy/Drugstore
 - Marijuana Dispensary
 - Liquor Store
 - Coffee/Donut Shop
2. A final approval letter from the Coventry Fire Marshall shall be obtained as a condition of Final Plan application submittal indicating the Central Coventry Fire Department's adequacy to provide fire services.

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3. The Applicant shall achieve all outside and state approvals through the RIDEM, RIDOT, and otherwise, and will submit such final permits and approvals as part of the Final Plan submission.
4. A lighting plan shall be included in the Final Plan application submittal and shall include consideration for such requirement including their type, wattage, installation and related specification detail. Lighting shall be placed at internal intersections and parking areas.
5. The Applicant shall replace *Acer sp.* trees within 10 feet of any pavement or walkways with a species of tree that is not a “top-rooted” tree.
6. The Applicant shall make grading improvements to the shoulder of Nooseneck Hill Road directly to the east of the subject parcel to assure that any drainage overflow above the 100-year storm will run freely to nearby public stormwater infrastructure to alleviate any potential flooding along Nooseneck Hill Road and adjacent private properties. Applicant shall coordinate with Town and State agencies, as needed, and show on revised plan as part of the Final Plan submission with additional coordination during site construction.
7. The Applicant shall provide concrete sidewalks throughout the development in locations as marked on the plan.
8. The proposed affordable units shall be distributed evenly throughout the development in terms of geographic area and type of unit (single family vs two-family) and shall be integrated and compatible in scale and architectural style to the market rate units.

As a condition of the issuance of each building permit, applicable Fair Share Development Fees, shall be paid, separate and apart from any other fees required, by check made out to “*Town of Coventry.*”



TOWN OF COVENTRY
Department of Planning & Development
1675 Flat River Road, Coventry, RI 02816
Phone (401) 822-9184 Fax (401) 822-6236

TECHNICAL REVIEW COMMITTEE REPORT

DATE: September 17, 2024
PROJECT NAME: "Coventry Crossings"
PROPERTIES: AP 10, Lot 29; AP 18, Lot 86
ADDRESS: Harkney Hill Rd.
ZONE: GB (General Business) with a Special Planning District Overlay, R-20 (Residential)
OWNERS: Elaine Eccleston Revocable Trust Agreement c/o Elaine Eccleston, Koszela John & Eccleston William Rev Trust ET AL
APPLICANT: KREG New Homes, LOC

This matter came before the Coventry Technical Review Committee at its September 16, 2024 meeting as a Pre-Application for a Major Land Development and Comprehensive Permit project in accordance with Article V, § D.4. of the Coventry Subdivision & Land Development Regulations.

An application and plan were submitted for review on August 30, 2024. The applicant proposes to develop 60 Single Family and 60 Duplex Condominiums dwelling units, for a total of 120 units. The proposal includes associated utilities and infrastructure. This application is a Comprehensive Permit and as such will have 25% of the units deed restricted as Low- and Moderate-Income Housing units. In addition, there will be a 12,500 sq. ft. commercial structure.

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

Coventry Crossings – Preliminary Plan Bldg Elev. Renderings.pdf
Coventry Crossings – Preliminary Plan Plan Set.pdf
Coventry Crossings – Preliminary Site Plan.pdf
Coventry Crossings – Preliminary Plan Project Narrative.pdf
Coventry Crossings – Preliminary Plan Stormwater Report.pdf
Coventry Crossings – Preliminary Plan Strmwtr O&M Plan.pdf

TOWN ENGINEER

Narrative

Development Standards and Permits

4.1 Requested Zoning Relief

- Due to the site's density, Engineering supports the use of porous pavement in select areas

4.2 Requested Land Development Regulation Waivers Articles XIII & XIV

- Engineering supports a minimum 24' roadway width (excluding the width of the bituminous berms)
- Engineering does not support the use of bituminous concrete sidewalks in lieu of concrete sidewalks

Preliminary Plan Plan Set

- Per Zoning Ordinance Section 1207, trash collection area w/ screening required for commercial building
- Please consider handicap access to the community mailbox
- Per Zoning Ordinance Section 1210(C), loading space shall be 12' x 60'
- Per Subdivision Regulation Article XIV (D), install wheel chair ramps in sidewalk at every intersection in accordance with RIDOT Std 43.32
- Parking stalls shall have concrete curbing or concrete car stops
- Add a speed limit sign at the entrance to Road "A" and Road "B". Add at least one additional speed limit sign on Road "C" and Road "D" within site
- Add proposed electric to Utility Plans
- Provide street lighting at all internal roadway intersections and parking areas
- Does above ground water service enclosure require vehicular access for servicing?
- Request that As-Built Plans for the stormwater management system, sewer system and water system be submitted to the Town of Coventry
- A Town of Coventry Soil Erosion and Sediment Control (SESC) Plan Application is required for this project
- A SESC narrative based upon the RIDEM standard template must be submitted
- Include a detail for drains behind Buildings 26, 27 and 90.

Stormwater Management Report

- Section 3.3 Proposed Conditions (PWS-2B) - Paragraph states that 'the Compensation Area' has been designed to discharge northeast to the Nooseneck Hill closed drainage system during storm events larger than the 100-year storm in the same manner as the natural ponding areas overflow under existing conditions'. With the recent history of short duration/high intensity rainfall events, I feel that there is a high probability that there will be discharge from the Compensation Area at some time.
- Engineering requests a call or meeting with the Engineer of Record to discuss overall design of the Compensation Area and how Design Point 1 can adequately accept overflow from this area without impact to existing adjacent properties.

PRINCIPAL PLANNER DESIGNER

- Request applicant provide conceptual elevations of the proposed commercial building from all sides prior to Public Hearing.
- Request applicant submit a narrative prior to Public Hearing to describe the status of state permit submissions to date, as well as any preliminary determinations, discussions, or consensus reached with state on permits such as RIDOT PAP, RIDEM OWTS, RIDEM Wetlands, and RIDEM

Stormwater. This comment is intended to provide the Town with evidence that state permits can be achieved without designed changes to the immediate Town application.

- Request to add an additional pedestrian pathway from the northern elbow of “Road C” to the outlet on Wisteria Drive.
- Seeking clarification on the applicant’s approach for trash collection.
- Seeking clarification on the status of the significant tree near Harkney Hill Road. The tree’s outline is shown on some proposed plans, but unclear if it is being preserved and/or what protections may be used to preserve the tree.
- Seeking clarification on the total number of bedrooms proposed per unit.
- Seeking clarification on the number of homeownership vs. rental units proposed.

Planning notes that the traffic study report submitted as part of the Master Plan Application is still valid as the number of units has been reduced and therefore no additional traffic review is warranted at this stage.

PUBLIC WORKS DIRECTOR

- **Plan C-1.1** The pedestrian crossing located on Harkney Hill Road should include an ADA compliant concrete sidewalk along the south side of Harkney Hill Road to extend to the rear parking area of the retail store at 2011 Nooseneck Hill Road. This will alleviate placing pedestrians on a state roadway so close to a major intersection.
- **Plan C-2.2** What is the purpose of the sidewalk at the exit of the project on the west side that ties into nothing and leads pedestrians towards a turn out lane at Hill Farm Road.
- **Plan C-2.4** What is the purpose of the sidewalk at the exit of the project on the west side of Nooseneck Hill Road that ties into nothing and leads pedestrians towards a lane of travel towards Harkney Hill Road.
- **Plan C-3.4** What is going to protect the OWTS discharge field from an accident at the major intersection possibly resulting in a catastrophic failure for the residents.
- **NOTE:** What are the comments of Kent County Water Authority regarding the potential location of the OWTS discharge field being located across the street from their underground Mishnock Water Aquifer servicing the drinking water for numerous ratepayers. Do the geo-technical reports, water table analysis’, and soil composition types guarantee the safety of the drinking water supply?
- **Plan C-4.3** BMP #2 has a 50’ spillway the empties towards the existing homes on Wood Cove Drive. The BMP has an elevation of 251.0-253.0, a two-foot difference and will most likely cause a flooding situation for those homes. The Town is currently experiencing this type of drainage issue with another development affecting abutters- Let’s not repeat this mistake.
- **Plan L-2.0** All Acer species should not be allowed within 10’ of any pavement/walks as they are a top-rooted tree which causes safety issues as the roots push through.

FIRE REPRESENTATIVE

- Needs to meet NFPA fire flow requirements Buildings/Hydrants
- Fire access to include limiting dead ends

- If there are cul-de-sac must be of size to turn around fire apparatus
- Streetlights (private development) not fire district responsibility

POLICE CHIEF

- No comment at this time.

PLANNING COMMISSION CHAIR

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