



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

## **STAFF REPORT**

<b>Project Name:</b>	<b>Coventry Self Storage</b>
<b>Plan Type:</b>	Unified Development Review (Major Land Development w/ associated Dimensional Variances)
<b>Plan Review Phase:</b>	Preliminary Plan
<b>Owner:</b>	Nooseneck Hill Coventry, LLC
<b>Applicant:</b>	Kimley-Horn and Associates, Inc.
<b>Address:</b>	1920 Nooseneck Hill Road
<b>Plat / Lot / Zone:</b>	<b>AP 10 Lot 31 Zone GB-1 Lot Size 3.7 acres</b>
<b>Existing Use:</b>	Self-storage facility
<b>Proposed Use:</b>	Additional three-story, self-storage building
<b>Description:</b>	Applicant proposes to develop a three-story, 75,000 GSF commercial self-storage building as an addition to its existing self-storage complex. The applicant is seeking zoning variances for the building design elements proposed for this site (which is located within a Special Planning Overlay District) as well as for the proposed number of loading spaces and therefore will be heard via Unified Development Review. The applicant also seeks a reduction in the number of required parking spaces.

### **I. PROJECT INFORMATION**

#### **Overview**

This matter previously came before the Planning Commission at its Master Plan phase of review in June 2023, with Master Plan approval being granted in a decision recorded on July 28, 2023. The applicant was unable to submit a complete Preliminary Plan application prior to January 1, 2024, when the Town's revisions to the Schedule of Uses – namely the re-designation of all uses previously allowed via special-use permits to "not permitted" – went into effect in response to changes in state law. Self-storage was one of the many uses affected by this change. Rather than attempt to secure approval via a use variance, the applicant elected to defer its Preliminary Plan submittal until after the Town designated self-storage as an allowed use in the GB-1 zone, which finally occurred on March 25<sup>th</sup> of this year. Certain supplementary materials in the Preliminary Plan application before the Commission this month date to 2023 for the reasons listed above; these materials remain current.

Since its initial 2023 attempt to submit a Preliminary Plan application, the applicant identified several dimensional variances that would be required, and changes in state law established the Unified Development Review process. Therefore, the Planning Commission will make separate votes on the companion planning and zoning applications for this project.

### Existing Conditions



The subject parcel is located between Shoreside Construction and Iannotti Funeral Home along Nooseneck Hill Road, both of which share the subject parcel's zoning designations of GB-1 (General business, minimum one acre) and SPD (Route 3 and Sandy Bottom Road Special Planning Overlay District/Special Management District). It also abuts the Leisure Village mobile home park, zoned RR-2 (Rural Residential, minimum two acres) to the rear.

The middle third of the site hosts six, one-story, drive-up style, self-storage buildings which comprise the existing CubeSmart facility. The undeveloped third closest to Nooseneck Hill Road would accommodate the proposed three-story self-storage building, while the rear third would remain undeveloped.

No wetlands exist on the site and the parcel is located within Zone "X" (defined as area outside the 0.2% annual chance floodplain) of the National Flood Insurance Maps for the Town of Coventry. Although the subject parcel is not located within a Groundwater Protection Zone or a Local Historic District, it does fall within a Natural Heritage Area (RIDEM ID #125).

## Proposed Conditions



The applicant proposes to construct a three-story, 75,088 GFA, climate-controlled self-storage building in front of the six existing self-storage buildings as an expansion of CubeSmart's existing facility. The new building would be served by four new parking spaces (one of which would be reserved for handicapped access) along the entrance driveway and a single loading space along the rear of the building. The existing dumpster would be relocated to the rear of the proposed building and enclosed/screened in accordance with Town regulations.

The building would be served by public water and a private OWTS. Stormwater management would be achieved with a surface detention basin between the front of the building and Nooseneck Hill Road, which will require the removal of several existing trees. The applicant has submitted a landscaping plan that would replace these with eight new street trees and two additional trees along the driveway entrance for visual screening. While the entire self-storage facility will be surrounded by a fence for security, the applicant has agreed to provide a decorative black metal fence (rather than chain-link) around the front yard of the building to conform to the SPD General Business Design Guidelines document on which the Zoning Code language is based.

To facilitate this application, the applicant is requesting several variances and waivers, which will be discussed in greater detail in the following sections of this report.



## **Variances**

The applicant has requested dimensional relief for number of loading spaces provided and for four building design elements associated with the provisions of the Special Planning Overlay District, the purpose of which is to improve the functionality and aesthetic character of the Route 3 (Nooseneck Hill Road) and Sandy Bottom Road corridors. Specifically, the applicant proposes:

- One loading space, where eight would be required per Article XII, Section 1210(c)(1-2);
- A flat roof for the proposed building, where flat roofs are not allowed per Article V, Section 530(e)(2)(a)
- Segments of proposed building facades without any windows greater than 60 feet in length, where 60 feet is the maximum windowless façade length per Article V, Section 530(e)(2)(e)(1)
- No customer entrance on the proposed building's street-facing facade, where at least one would be required per Article V, Section 530(g)(2); and
- No planting of new evergreen trees on the rear side of the proposed building, where these would be required on all sides of a building which abut or face a residential zoning district per Article V, Section 530(g)(3).

The applicant has submitted a dimensional variance application and two memos (one dated February 27, 2024 regarding loading spaces, and another dated June 27, 2025 regarding building design elements) providing justification for its dimensional variance requests. Staff has no concerns with the requested relief for the following reasons:

- The number of loading spaces required by code is based on GFA, and while this may be appropriate for estimating the loading space needs of a distribution center or other similar use, self-storage facilities are known for low traffic generation. Eight loading spaces would be excessive for this use.
- Flat roofs are standard for buildings of this massing and use; the applicant does propose a partial decorative parapet which will add a comparable degree of roofline variation as can be found next door on the Shoreside Construction building.
- Only the west- and south-facing facades will have windowless segments in excess of 60 feet. Iannotti Funeral Home will obscure most of the western façade, and the southern façade is the least visible as it faces the interior of the site.
- As the building is set back 80 feet from the road and does not feature a street-level retail component, the relevance of providing a street-facing entrance is minimized. The entrance will be near the Nooseneck Hill Road-end of the building's northern side.
- The proposed development will be constructed on the far side of the subject parcel from Leisure Village, meaning the existing vegetated buffer lies far outside the limits of disturbance. As the existing buffer is already substantial, additional plantings are of limited benefit.

It should be noted that the applicant realized after submitting its dimensional variance application and mailing public notice to abutters that dimensional relief will also be required for the size of the proposed wall-mounted sign (the applicant proposes an 81 SF wall-mounted sign, where 60 SF is the maximum allowed sign area per Article 15, Section 1530(a)(2) of the Zoning Code). In a supplementary letter dated July 10<sup>th</sup>, the applicant confirmed that it understands relief cannot be granted for this item through the Unified Development Review process at the July meeting, and it will pursue said signage relief as a separate request through a future application.

### **Interdepartmental Review and Comments**

Please see the attached report from the Technical Review Committee (dated July 14, 2025) for interdepartmental comments on this application.

### **Waivers**

The applicant has requested waivers from the sidewalk, curbing, and streetlight requirements of the Subdivision Regulations, as well as from the parking requirements enumerated in Article XII, Section 1220(c) (Table 12-3) of the Zoning Code. (Recall that per Article XII, Section 1220(a) of the Zoning Code, the Town Engineer or the Planning Commission has the authority to reduce the amount of parking required for a given proposal when it determines the reduction is warranted, and therefore relief would be granted as a waiver instead of as a variance.)

The applicant has two memos (one dated April 10, 2023 regarding parking spaces, and another dated July 10, 2025 regarding the sidewalk/curbing/streetlight requirements) providing justification for its waiver requests. Staff has no concerns with the requested relief for the following reasons:

- The number of parking spaces required by code is based on GFA (1 space per 300 feet of GFA, minimum of three spaces). This would equate to 250 new parking spaces. Self-storage facilities are known for low traffic generation; 250 new parking spaces would be excessive for this use.
- Any new sidewalks or curbing on the subject parcel would not connect to existing sidewalk/curbing networks.
- Streetlights exist on the opposite side of Nooseneck Hill Road.

The Town Engineer is supportive of a parking reduction to allow a total of four (4) new parking spaces in association with this proposal, inclusive of one (1) handicapped space. Planning staff is supportive of all requested waivers, and recommends positive consideration by the Planning Commission.

## II. DIMENSIONAL VARIANCE

### Findings of Fact

Staff has conducted a review of the Dimensional Variance component of this application for conformance with required standards set forth in RIGL Section 45-24-41. Staff's findings are as follows:

*RIGL § 45-24-41. General provisions – Variances. (d)(1) states, "That the hardship from which the applicant seeks relief is due to the unique characteristics of the subject land or structure and not to the general characteristics of the surrounding area; and is not due to a physical or economic disability of the applicant, excepting those physical disabilities addressed in § 45-24-30(a)(16)"*

1. The request relief is appropriate given the unique conditions on the subject parcel in terms of the use of self-storage and the location of non-conforming structure in the rear of the site. These unique conditions have resulted in the need to expand the self-storage use through a large building in the front of the site whose design and massing does not inherently fit within the required design standards of the Special Planning Overlay District. Furthermore, the hardship from which the applicant seeks relief is not due to a physical or economic disability.

*RIGL § 45-24-41. General provisions – Variances. (d)(2) states, "That the hardship is not the result of any prior action of the applicant"*

2. The applicant is not responsible for the subject parcel's unique existing conditions which have resulting in the immediate application, and therefore the hardship is not the prior action of this applicant.

*RIGL § 45-24-41. General provisions – Variances. (d)(3) states, "That the granting of the requested variance will not alter the general character of the surrounding area or impair the intent or purpose of the zoning ordinance or the comprehensive plan upon which the ordinance is based"*

3. The subject parcel's existing Zoning designation is GB-1 (General Business), while its Future Land Use designation is Business. The proposed self-storage use is consistent not only with the intent of both Zoning and Future Land Use, but also with the mix of business uses currently found in close proximity along Nooseneck Hill Road.
4. The applicant's desired building model is reasonably comparable in design and use to other nearby storage buildings along Nooseneck Hill Road.
5. The proposed street trees and decorative fencing to be installed along the subject parcel's Nooseneck Hill Road frontage will serve to partially screen the building from the public right-of-way to further minimize the potential for conflicts with the general character of the surrounding area.

*RIGL § 45-24-41. General provisions – Variances. (d)(4) states, "In granting a dimensional variance, that the hardship suffered by the owner of the subject property if the dimensional variance is not granted amounts to more than a mere inconvenience, meaning that relief sought is minimal to a reasonable enjoyment of the permitted use to which the property is proposed to be devoted. The fact that a use*

*may be more profitable or that a structure may be more valuable after the relief is granted is not grounds for relief. The zoning board of review, or, [planning board] in unified development review, has the power to grant dimensional variances where the use is permitted by special-use permit."*

6. Both with respect to the building design elements and the number of loading spaces, the relief sought appears minimal as well as appropriately-scaled to the applicant's proposed use.
7. The applicant's Zoning Narrative provides a reasonable foundation of information on the record for positive consideration of the requested Dimensional Variances.

### **Recommendation**

Staff finds this proposal consistent with the standards for required Dimensional Variance findings of fact set forth in RIGL Section 45-24-41. Staff therefore recommends that the Planning Commission adopt the documented findings of fact and approve the Dimensional Variance application with a condition that the applicant receive approval of its Final Plan – Major Land Development application.

## **III. MAJOR LAND DEVELOPMENT**

### **Findings of Fact**

Staff has conducted an orderly, thorough, and expeditious technical review of this Preliminary 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. The self-storage use proposed for this parcel is consistent with the Business designation.

*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 proposed use for the subject parcel is allowed by-right within the GB-1 zone.
3. Preliminary Plan approval is conditioned upon obtaining relief in the form of Dimensional Variances.
4. The proposal will not alter the general character of the surrounding area or impair the intent or purpose of the Coventry Zoning Code as consistent with the findings for the Dimensional Variance component of this project.

*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 Preliminary 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, but as a pre-disturbed site no Natural Heritage impacts are anticipated.

*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 subject parcel currently enjoys adequate permanent physical access to a public right-of-way (Nooseneck Hill Road).
8. The proposed building will be accessed via the facility’s existing driveway, which provides 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 waivers, and **approve** the Preliminary Plan application, subject to the conditions denoted below.

## **Conditions of approval**

1. Preliminary Plan approval is conditioned upon strict adherence to the associated Dimensional Variance Application as presented and approved.
2. The applicant shall submit the following items with its Final Plan application: a revised site plan with its Final Plan application containing the following edits:
  - a. Approval letter from the Central Coventry Fire District
  - b. Current Town and Fire tax certificates
  - c. Evidence of all required state and local permits
  - d. Approval letter from the Kent County Water Authority confirming adequate water flow can be provided to protect the building in case of fire
  - e. A revised site plan showing the proposed fencing located behind the proposed street trees (i.e. between the trees and the front of the proposed building).
  - f. Additional information regarding the existing and proposed restrooms as discussed in the Engineer’s comments contained in the TRC Report for this project dated 7/14/2025.



3. The Engineer of Record shall submit a Certificate of Conformance (COC) prior to issuance of Certificates of Occupancy for the proposed buildings.
4. 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.

Pursuant to Article XII. Appeals, Subsection A. Procedure for Appeals to the Board of Appeal of the Coventry Subdivision Regulations, the decision of the Planning Commission herein may be appealed in writing by any party aggrieved by said decision to the Coventry Board of Appeal. Any such appeal shall be made within 20 days of the day of the decision is recorded and posted in the Town Clerk's Office.



## TOWN OF COVENTRY

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

**DATE:** July 14, 2025  
**PROJECT NAME:** "Coventry Self Storage"  
**PROPERTIES:** AP 10, Lot 31  
**ADDRESS:** 1920 Nooseneck Hill Road  
**ZONE:** GB-1/SPD (General Business / Special Planning Overlay District)  
**OWNER:** Nooseneck Hill Coventry, LLC (c/o Morgan Bullen)  
**APPLICANT:** Kimley-Horn and Associates, Inc. (c/o Steve Fusco)

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

An application and plan were initially submitted for review on July 10, 2025. The applicant proposes to develop a three-story, 75,000 GSF commercial self-storage building as an addition to its existing self-storage complex. The application will be heard by the Planning Commission via Unified Development Review, as the applicant is seeking zoning variances for the building design elements proposed for this site (which is located within a Special Planning Overlay District) as well as for the proposed number of loading spaces. The applicant also seeks a reduction in the number of required parking spaces.

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

- Coventry Self Storage - OWTS Permit.pdf
- Coventry Self Storage - Approved SESC Application and Narrative.pdf
- Coventry Self Storage - Approved SESC Plan\_0.pdf
- Coventry Self Storage - Building Elevations & Perspectives.pdf
- Coventry Self Storage - Form ZBR-DV.pdf
- Coventry Self Storage - Infiltration Data Report.pdf
- Coventry Self Storage - Location of Soil and Groundwater Test Holes.pdf
- Coventry Self Storage - Narrative\_0.pdf
- Coventry Self Storage - O&M Plan\_0.pdf
- Coventry Self Storage - Water Pressure Memo dated 2025-05-05.pdf
- Coventry Self Storage - RIPDES Permit.pdf
- Coventry Self Storage - SWPPP.pdf
- Coventry Self Storage - Variance Memo - Loading Spaces.pdf
- Coventry Self Storage - Waiver Memo - Parking Spaces.pdf
- Coventry Self Storage - Preliminary Plan Set dated 2025-07-10.pdf
- Coventry Self Storage - Waiver Memo - Sub Regs Items.pdf

## 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) Additional information is requested regarding Proposed Drainage Area (DA-6). An off-line discussion with the stormwater designer is requested regarding the overland flow to Study Point 3.

### OWTS Permit

- 1) Additional information regarding the proposed restroom(s) is requested. Describe any differences from the restroom currently in-use in the existing building such as number of users, private/public operation and hours of operation.
- 2) Provide six (6) months of water meter readings from existing building that contain restroom to be decommissioned.

## PRINCIPAL PLANNER DESIGNER

- Regarding the requested variances, Planning Staff is aware that the applicant is seeking dimensional relief from the required minimum number of loading spaces and for several building design elements established in the Special Planning Overlay District regulations, namely flat rooflines, windowless facades in excess of 60 feet, (lack of) customer entrance on the street-facing side of the building, and evergreen tree buffering. Planning Staff will provide analysis in its Staff Report to the Planning Commission.
- Planning staff also notes for the record that the applicant realized after submitting its dimensional variance application and mailing public notice to abutters that dimensional relief will also be required for the proposed wall-mounted sign. The applicant has submitted a letter clarifying that it understands relief will not be granted for that item through the Unified

Development Review process at the July meeting and will pursue said signage relief as a separate request through a future application.

- Regarding the requested waivers, the applicant seeks a reduction in the required minimum number of off-street parking spaces as well as waivers from the sidewalk, streetlight, and curbing requirements of the Subdivision Regulations. The applicant has provided written justification for its waiver requests.
- The applicant is currently working with KCWA to secure an updated water approval letter based on its Preliminary Plan design and intends to submit the letter once received.
- The applicant confirmed via email that the height of the building, as measured from the base to the tallest decorative parapet, will not exceed the 35-foot height limit, meaning the building height will comply with Town zoning requirements and no variance is required for this item.

#### PUBLIC WORKS DIRECTOR

- No comments at this time.

#### FIRE REPRESENTATIVE

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

#### POLICE CHIEF

- No comments at this time.

#### PLANNING COMMISSION CHAIR

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