



TOWN OF COVENTRY, RI  
DEPARTMENT OF PLANNING & DEVELOPMENT

## STAFF REPORT

<b>Project Name:</b>	<b>Westwood Estates Reconfiguration Plan</b>
<b>Plan Type:</b>	Major Land Development with associated Zone Change
<b>Plan Review Phase:</b>	Master Plan
<b>Owners:</b>	Hometown America Communities, LLC
<b>Applicant:</b>	Same
<b>Address:</b>	1A Liena Rose Way
<b>Plat / Lot / Zone:</b>	<b>AP 32 Lot 32.1, AP 43 Lots 35 &amp; 35.1, AP 44 Lots 4, 5, &amp; 6 Zone PD Lot Size</b> 219.4 acres
<b>Existing Use:</b>	Mobile Home Park
<b>Proposed Use:</b>	Same with additional 46 units
<b>Description:</b>	The applicant, Hometown America Communities, LLC, is proposing to increase the number of mobile home sites within the property by 46 units through a combination of the creation of new infill sites along existing roads and three (3) new private roads within the property (Phase 1), and the relocation/reorientation of some existing mobile homes to allow for the installation of new mobile homes on adjacent sites (Phase 2). 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.

### Background

This item previously came before the Technical Review Commission as a Pre-Application at the August 19, 2024 meeting for a proposed Major Land Development with a Zone Change of an over 219-acre subject parcel comprised of six lots: AP 32 Lot 32.1, AP 43 Lots 35 & 35.1, and AP 44 Lots 4, 5, & 6. At that time the applicant shared conceptual site plans. For this immediate Master Plan application, the applicant has proposed to increase the number of mobile home units on the properties by 46 from 466 to 512. They propose to do this by creating 3 new roadways with “infill” units along those roadways, and by turning some units that are parallel to the roadway to perpendicular to the roadway and adding new units in between the turned units.

The applicant has submitted a narrative, site analysis, Plan Set, and a proposed Ordinance in support of its Master Plan application.

## Existing Conditions



Most of the existing subject parcels are located along the east and or south of Reservoir and Airport Roads. Three parcels are entirely internal to the two largest parcels. One parcel is located north of Airport Rd.

All lots are zoned PD (Planned Development) and the site largely consists of 466 mobile homes with some undeveloped, but with wet land around the south and eastern edges. The mobile home park has been

in existence in one stage or another since at least the 1970's. The land to the west is residential, industrial to the south, undeveloped and residential to the east, and undeveloped and industrial to the north.

As noted in the narrative, the subject parcels lie mostly within Flood Zone X. Some portions of the southeastern parcel are located within 'Zone X-0.2% Annual Chance Flood Hazard' and some portions are located in the 'Zone AE – Special Flood Hazard Area with Base Flood Elevation.' There are wetlands and watercourses on the southeast parcel, and the parcels do lie within a groundwater protection area. A portion of the site 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.

It is important to note that Coventry has an upper limit on the number of mobile homes allowed Town-wide. This limit is established in the Code of Ordinances, Chapter §158, Sec. 11 (not zoning) and states in full,

"The maximum number of licensed units that can be granted by the Town shall be limited to 32 licensed units for each 1,000 inhabitants of the Town. Data from the United States official decennial census shall be utilized in determining the official population of the Town; provided, however, that an applicant may commission a census for the purpose of determining the population of the Town at the time of a license application. If such census data is acceptable to the Town Council and Town Planning Commission, then such data may be utilized in determining the population at the time of such application. All license grants shall be issued only following approval of the Town Council, following a public hearing."

Given that the 2020 US Census count was 35,688 Coventry is allowed 1142 total units. Currently, there are 5 mobile home parks: Leisure Valley (70 units), Mapleroot Village (187 units), Ramblewood Estates (200 units), Sherwood Valley (170 units) and Westwood Estates (466 units) for a total of 1,093 units. This leaves 49 units available to further expansion of mobile home parks.

As part of the Pre-Application process, the four other mobile home parks in Coventry were contacted either by phone or email and asked if they had any plans for expansion. All responded that they did not have any expansion plans, so it was decided to grant Westwood Estates the majority of the available units, 46 units in total. This leaves 3 units available for unexpected circumstances.

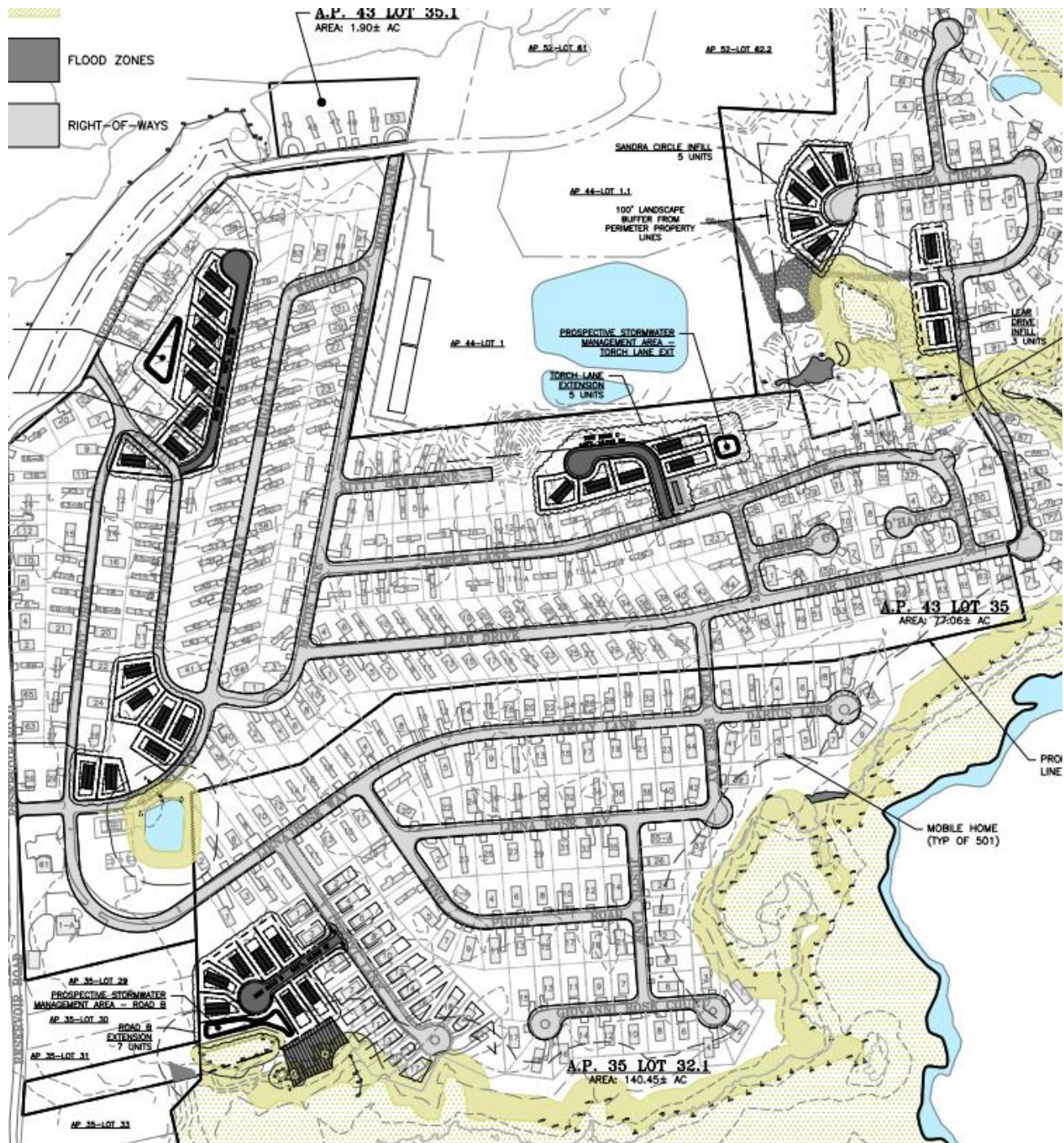
### **Proposed Conditions**

The applicant is proposing to further develop the site in two phases. Phase 1 will be to at 37 new sites along either existing internal roadways, or by creating three new roadways. The new roadways are proposed to be off of Aerial Way, Cheryl Lane, and Torch Lane. Additional infill site will be along Wright Way, and at the ends of Sandra Circle and Lear Way. Phase 2 will involve the addition of 9 new sites that will be created by turning several existing sites sideways, from parallel to the roadway to perpendicular to the roadway. The new units will be infill between the newly aligned units. This is proposed for a section



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of Milton and Torch Ways. Site plans providing a general overview of the proposed new layout of the mobile home sites can be seen on the following pages:







The project will create approximately 1,500 feet of roadway in three different places. Road “A” will come off of Poppin John Lane with 7 new units. Road “B” will be off of Cheryl Lane with 7 new units. Road “C” comes north off of Torch Lane with 5 additional units. Two things are of note with the proposed Road “C”. One, there will be a need to turn the current unit at 24 Torch Lane perpendicular to Torch Lane for the creation of the new road. Second, there is substantial encroachment from the north under the area that Road “C” would occupy. This would have to be resolved before construction could begin.

The applicant has provided areas on the proposed plans for areas of stormwater management. It is unclear if these proposed basins will meet the standards needed. Such calculations will be required at Preliminary Plan Stage. Previous expansions of the park have occurred with no stormwater infrastructure, most recently Cheryl Lane. This will have to be taken into consideration as there is now a chance to correct any missed stormwater infrastructure needs.

The applicant has also stated that some of the units will be connected to existing sewer infrastructure, and some units will be using OWTS systems. It is currently unknown to the Town which units will on sewer and which will be on septic.

The Planning Department had raised several questions in regards to this proposal, as listed in the TRC comments. Several of these questions were given responses by the applicant's engineer at the TRC meeting. The additional information is as follows:

The applicant will include an Administrative Subdivision that will combine AP 35 Lot 32.001, AP 43 Lot 35, and AP 44 Lots 4, 5, & 6 into one lot. AP 43 Lot 35.001 will remain its own lot as it is across Airport Rd.

The applicant will study the conditions on the ground and relay additional information on the sewer system infrastructure of the park and what expansion of the sewer system to new units would involve as part of Preliminary Plan stage.

The applicant stated that they are above 10% open and recreation space as required by §255-1120B.(4) and would show the calculation and the space used for that calculation in resubmitted plans at Master Plan stage.

The applicant would supply a Traffic Study, a Landscape Plan, a Lighting/Photometric Plan, and the location of the sewer and OWTS infrastructure at the Preliminary Plan stage.

There were questions involving some of the proposed sites and whether they would meet the required 50' width at the setback line as required in §255-1120B.(2). The applicant's engineer stated that the sites do meet the standard and would show that on resubmitted plans at Master Plan stage.

Additionally, the proposed plans showed units located on "Road B", off of Cheryl Lane, that are located within the 100' buffer as required in §255-1120B.(3). The applicant's engineer responded by saying they would redesign the roadway or remove the units so that resubmitted plans at Master Plan stage comply with this Code.

Planning Staff had brought up the idea of connecting the proposed "Road A" with a small stub that comes off of Airport Road as they are in proximity with each other. The applicant's engineer stated that they would look into that, but added that it may add a complication as Airport Road is a private roadway and

agreement would have to be reached with several parties. We will be asking for this agreement as part of the Preliminary Plan stage if the agreement is reached.

Other items discussed at TRC, such as information regarding the physical and legal mechanisms involved in moving the units from parallel to perpendicular to the roadway, would have to be discussed with Hometown America and answers would be forthcoming.

It is also important to note that based upon further informal discussion with the applicant, the 9 units that are shown along Milton and Torch Lanes are meant to be flexible in their location and may be sited elsewhere. While the applicant's plan is to add 9 units by turning units sideways and placing units next to the newly turned units, the applicant stated at the TRC meeting that the units shown on the plans are for informational purposes only and do not represent the final locations of the added units. They should only be treated as an example of what the new alignment might look like. The placement of the units will depend on which owners are willing to have units relocated, or if homeowners move out and an opportunity presents itself to move an unoccupied unit.

These 9 "floating" units are of concern to Planning Staff and it is unsure at this time if the Planning Commission should approve, and therefore vest, 9 units that do not have known locations. It is reasonable for the Planning Commission to inquire what is the applicant's "Plan B" if such units are granted approval, and none of the 9 locations identified on the map are feasible due to owners who do not wish to participate. Can units be approved at a Master Plan stage for residing on Milton and Torch Lanes, then in Preliminary Plan stage, be re-located, for example, to Kitty Hawk Lane? This will be a question that needs additional time and attention by the applicant during the Master Plan stage of review. The lack of clarity around this issue is one of Planning Staff's main concerns with the applicant at this point, and part of our rationale for the Staff's recommendation to continue the Major Land Development Application to the next regular meeting while we await further information from the applicant.

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

This proposal relies upon a companion Zone Change ordinance which would codify new code for the Westwood Estates Mobile Home District (MHD). This new code would do two important actions. It would create a new Westwood Estates MHD, and it would remove the 96 apartments currently allowed in the current ordinance (05-03-0239) for Westwood Estates, that was adopted on November 24, 2003. While much of Article XI of Chapter 255 is proposed to be included, there are some very important differences.

The ordinance used as the base document by the applicant's counsel was an out of date version. A new ordinance for Article XI of the Zoning Code, Chapter 255, was adopted in March of 2025. (The majority of the changes were to the procedure of the formation of a new MHD and have no effect on this

application.) There were several minor changes that would need to be made to update the proposed ordinance to bring it in line with the current version of the ordinance.

Several sections included in Article XI were removed from the proposed ordinance that Planning Staff had questions on, including requirements for lots areas and standards for roadways. It was stated by Planning Staff at TRC that, in the proposed ordinance's current form, it would likely receive a negative recommendation based on concerns with the removing of the above noted provisions. In discussions with the applicant's counsel it was discovered that the sections were removed due to the concern that several of the property's pre-existing roadways and mobile home sites do not meet current or proposed standards and it was the concern of having to bring these pre-existing non-conformities into compliance that was the root cause of removing the sections of the code that they did. Applicant's counsel stated they were not averse to putting the items back in, provided there were sufficient protections for the pre-existing non-conforming units.

These explanations satisfied the majority of Planning Staff's concerns and it was agreed that, while the proposed ordinance was not acceptable in its current form, a path forward was identified where the reintroduction of several removed items and other changes could lead to a different recommendation from Planning Staff. The applicant's counsel stated that they would confer with their client and get back to us with further written explanations of the requested changes to the proposed code. We await further submissions and explanations from the applicant during the Master Plan stage which will inform our future recommendation. Due to the many unanswered questions regarding this proposed ordinance, Planning Staff advises the Commission to continue their advisory recommendation on the Ordinance to the next regular meeting, consistent with the continuance of the Major Land Development.

### **Interdepartmental Review and Comments**

Please see the attached report from the Technical Review Committee (dated August 18, 2025) for interdepartmental comments on this application.

### **Recommendation**

Given the unanswered questions that Planning Staff have with the Major Land Development Application, and the additional questions around the current form of the proposed ordinance, Staff does NOT have a specific recommendation on either this application or the proposed ordinance at this time. As such, Staff recommends the Planning Commission vote to continue both the review of the Major Land Development Application and Public Hearing, as well as the recommendation to the Town Council on the proposed ordinance to the September 24, 2025 Planning Commission meeting. Staff further recommends the applicant submit a revised plan and an updated ordinance consistent with TRC comments and the Staff discussion contained in this report, to facilitate subsequent review.





## TOWN OF COVENTRY

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### TECHNICAL REVIEW COMMITTEE REPORT

**DATE:** August 18, 2025  
**PROJECT NAME:** "Westwood Estates Reconfiguration Plan"  
**PROPERTIES:** AP 43, Lot 35, 35.001; AP 35, Lot 32.001; and AP 44, Lots 4, 5, & 6  
**ADDRESS:** 0, 49, and 64 Reservoir Road  
**ZONE:** PD/RMH (Planned Development with the Residential Mobile Home District)  
**OWNER/APPLICANT:** Hometown America Communities, LLC

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This matter came before the Coventry Technical Review Committee at its August 18, 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 August 5, 2025. The applicant proposes to increase the number of mobile home sites within the property through a combination of the creation of new infill sites along existing roads and three (3) new private roads within the property (Phase 1), and the relocation/reorientation of some existing mobile homes to allow for the installation of new mobile homes on adjacent sites (Phase 2). 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:

Westwood Est - Current Ordinance.pdf  
Westwood Est - Ltr to Town Clerk.pdf  
Westwood Est - Master Plan.pdf  
Westwood Est - Narrative.pdf  
Westwood Est - Proposed Amendment to PD Zone.pdf  
Westwood Est - Site Analysis.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 capacity analysis will be required for the proposed sewer connections to the existing private sewer system
- 3) A Town of Coventry Sewer Connection Application will be required for the proposed sewer connections
- 4) Stormwater management shall be provided for the proposed roadways and site that meet state and town requirements
- 5) Please describe how the existing stormwater management system operates for the entire site. Stormwater improvements were not implemented on any projects performed over the past years. What improvements are planned to address existing areas of ponding?

#### PRINCIPAL PLANNER DESIGNER

##### Major Land Development Application

- Planning Staff requests AP 44 Lots 4, 5, & 6 be added to the application or explain why they are not included in the application.
- Provide information on which new units will have sewer connections and which will have OWTS.
- Show the designated areas on site plan and provide a calculation demonstrating that the Westwood Estates property still meets the required 10% of recreation and open space.
- Provide dimensions on site plan to demonstrate that all of the proposed sites meet the required 50' width at the setback line, specifically T1, T2, S1.
- Provide more information on the available parking/driveway locations for some of the proposed new units, specifically B6, B7, S4, S5, T1, T2.
- Provide more details on the physical method of moving the older units, including what would happen to units that get damaged.
- Provide a narrative summary that details the legal rights for mobile home owners who do not wish for their units to be moved or altered, and what is the applicant's plan if the proposed "infill" areas are rendered unavailable for new units based on mobile home owners who wish to remain in place.
- Provide clarification if the new units created by turning existing units will have the required width, size, and coverage limits.
- Provide confirmation on whether new stop signs are going to be installed at the newly created intersections.

- Provide clarification on how the application will maintain compliance with the required buffer on the new “Road B” (off Cheryl Lane). The proposed plans show little to no buffer where 100’ is required.
- Planning Staff requests that the applicant investigate whether the newly created “Road A” should connect to the stub that comes off of Airport Road that is in direct proximity in order to create this as a “through road”.
- Provide contextual information on what will happen to accessory structures (patios, carports, ramps, etc.) on the lots that will be realigned.
- Provide additional information on the rationale behind the waiver requested from the requirement to supply a letter from KCWA about providing water service (Line 55 of the checklist). Can such a letter be reasonably incorporated at this stage of the application?
- The location and details of the proposed septic systems will be required at Preliminary Plan stage.
- A landscaping plan will be required at the Preliminary Plan Stage.
- Planning Staff requests that the “lower 5” lots (AP 35 Lot 32.001, AP 43 Lot 35, AP 44 Lots 4, 5, & 6) be merged into one lot via an Administrative Subdivision (at Final Plan).

#### Ordinance Petition

- Planning Staff request the following changes and/or additional information regarding the proposed ordinance:
  - Reasoning of adding “There shall be no other requirements, standards or limitations applied to what is deemed to be acceptable recreational and/or open space.” At line 127.
  - Insert existing Mobile Home District (MHD) standard “Each individual mobile home lot shall contain a minimum area of 6,000 square feet. Lot size shall be increased by five square feet for each square foot that the mobile home and accessory buildings exceed the allowable size of 1,200 square feet.” back into Chapter 255-540.6 Section C.
  - Insert existing MHD standard “All streets shall be constructed in accordance with the requirements of Chapter 11 of the Code. Storm drainage plans must be provided and approved by the Town Engineer and shall result in no net increase of runoff.” back Chapter 255-540.6 Section C.
  - Insert existing MHD standard “All mobile home parks shall be provided with a service building consolidating all sanitary, laundry, management and other service facilities. The floor area of such service building shall not exceed 2,500 square feet.” At the appropriate location in the proposed Ordinance.
  - Insert the word “not” back into “The size of mobile homes shall be changed to a larger home...” on Line 182 of the proposed ordinance to be consistent with existing MHD standard.
  - Insert existing MHD standard “in accordance with 255-1130B(2) of the Code.” Back into Line 183 of the new ordinance.
- Planning Staff notes that there are several minor changes needed due to using the old MHD ordinance. The new MHD ordinance is 2025-07. Such changes will be communicated with applicant directly.
- Planning Staff suggest a rewrite of Chapter 255-540.5B of the proposed ordinance to improve readability.



#### PUBLIC WORKS DIRECTOR

- The amount of traffic that will be added to Reservoir Road with (46) additional units combined with growth already happening in North Wood Estates will impact the intersection with both Reservoir Road and Nooseneck Hill Roads. A traffic study should be conducted before any approvals are entertained, keep in mind the existing traffic from the High School.
- Storm Drainage study should be conducted in order to control all street runoff on-site.
- The applicant should consider submitting their plans to the Conservation Commission for review due to the proximity of Westwood Estates to the Pawtuxet River.
- Airport Road is private and should have a maintenance agreement.
- Does Kitty Hawk Lane have room for expansion?

#### FIRE REPRESENTATIVE

- Due to the park having a private system for the fire hydrants, the system shall be inspected and maintained in accordance with NFPA 25. This report is done every three years and contains the current status of the pressures and volumes available in the system to conduct fire protection for the buildings in the park.
- The system would also need to be capable of providing fire protection for the additional units proposed in this project. A new test of the system may need to be conducted.
- The lighting in the park is determined by the owners of the park as it is private. We would like to see additional lighting throughout the park as well although we cannot mandate it.

#### POLICE CHIEF

- The Police Department is in agreement with other TRC members that a traffic study is needed.

#### PLANNING COMMISSION CHAIR

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