



TOWN OF COVENTRY, RI
DEPARTMENT OF PLANNING & DEVELOPMENT
STAFF REPORT – FOREWORD

Project Name:	Willow Lakes Independent Living
Project Type:	Comprehensive Permit / Major Land Development
Project Review Phase:	Amendment to Preliminary Plan
Owner/Applicant:	LRT New London Ave Development, LLC
Address:	New London Turnpike
Plat / Lot / Zone:	AP 16 Lot 3 Zone R-20 Lot Size 12.38 acres
Existing Use:	Vacant Land (former gravel bank)
Proposed Use:	Independent Living Community with Assisted Living and Memory Care Facilities (202 Proposed Units) with 25% LMI Independent Living Units
Description:	Applicant seeks an Amendment to their previous Preliminary Plan approval for a proposed 202-unit independent living community with assisted living and memory care facilities. As a Comprehensive Permit application, 25% of the independent living units must be deed-restricted as affordable. No site design changes are proposed; the amendment includes only a new regulatory adjustment to exceed the maximum building height requirements.

Background and Process

This project previously received Preliminary Plan approval through a Planning Commission decision dated April 13, 2022. That approval expired after two years due to change of ownership and other factors, and the Planning Commission reinstated the Preliminary Plan approval through decision dated July 10, 2024. This project remains vested under state law.

The owner/applicant submitted a Final Plan application in February 2026. Upon receipt of this application, Planning staff determined that the proposed building height as represented in the architectural elevations would exceed the maximum allowable height. To rectify this discrepancy, the applicant now pursues an amendment to their Preliminary Plan that includes a single dimensional adjustment for height. No site design changes are proposed at this time. The applicant detailed this request through a letter from their attorney, dated March 20, 2026, which stated that the buildings will be three stories tall, with a pitched roof configuration. The proposed maximum building height will be 60’ (Building 1) where the maximum is 35’ per zoning code – Buildings 2 and 3 will be 54’ tall.

Given these circumstances, Planning staff have resubmitted the February 9, 2022 Staff Report with the June 21, 2024 Staff Foreword unchanged. The applicant has satisfactorily addressed stipulations (conditions of approval) #1, 6, 7, 8, 9, 10, 11, and 12 in the Preliminary Plan Reinstatement decision through a letter from their engineer, dated March 27, 2026, with responses. Planning staff presents

revised stipulations and the addition of the height adjustment to the list of waivers and adjustments below.

Interdepartmental Review and Comments

Please see the attached report from the Technical Review Committee (dated April 20, 2026) for interdepartmental comments on this application.

Staff Recommendation

Staff recommends that the Planning Commission **approve** the Preliminary Plan amendment, consistent with the stipulations, waivers and variances, and findings of fact contained in the reinstatement decision dated July 10, 2024 (with 2026 additions in **red text** and items to be removed in **strikethrough**):

Stipulations

- ~~1. The applicant shall obtain approval from Kent County Water Authority for the public water connection.~~
- ~~2. The Applicant shall receive approval from the Coventry Sewer Subcommittee, if required.~~ (1) The applicant shall obtain the Coventry Sewer Connection Permit and West Warwick Sewer Pretreatment Permit prior to obtaining the building permit Certificate of Occupancy for the first building.
- (2) The Applicant project will be allowed to proceed to Final Plan administratively.
- (3) The Planning Director's Report is incorporated into this Decision.
- (4) The Town Engineer's Report, dated April 21, 2021 shall be incorporated into this decision. It is noted that all 12 items in the report were satisfied.
- ~~6. Basin A, Sand Filter A1 and Sand Filter A2 should be protected from silty runoff during construction by surrounding each structure with silt fence (or equal) until the upland areas are stabilized. Please show the silt fence enclosure on the SESC Plan, Sheet 6 of 12.~~ (5) The applicant shall identify the location of the proposed LMI units and provide additional information on the proposed scale and architectural style of the LMI units with their Final Plan submission. Per RIGL § 45-53-4, LMI units proposed for a Comprehensive Permit application shall be "integrated throughout the development" and "compatible in scale and architectural style to the market rate units within the project."
- ~~7. On the SESC Plan, Sheet 6 of 12, the existing catch basins within New London Turnpike shall be protected with silt sack inserts. The proposed straw bale inlet protection and filter fabric protection is not appropriate for use on that roadway. Please show this detail on Sheet 7 of 12 in lieu of the straw bale detail. Please add a note to the plans stating all of the proposed silt sack inserts on New London Turnpike shall remain in place until the all disturbed areas associated with the sidewalk construction and site construction are complete.~~ (6) The bond for this proposed Comprehensive Permit application shall be set at \$153,030.00 and the associated inspection fee shall be set at \$3,060, as approved by the Planning Commission on August 28, 2024. The inspection

fee shall be paid to the Town of Coventry prior to commencing any further construction activity on the site.

- ~~8. The Applicant should clarify if the two small courtyards within the new building will have drainage systems and what types of surface covers will be proposed.~~ (7) The applicant shall submit a draft Record Plan with their Final Plan application.
- ~~9. Add a note to the Sewer Notes stating all manholes, gravity sewer lines and force mains shall be tested according to the procedures specified in the West Warwick Standard Sanitary Sewer Requirements. A representative from the Town of Coventry shall be present for all of testing.~~
- ~~10. On the Offsite Sidewalk Plans, please add a note stating "Any damage to the existing roadway, existing roadway drainage system, right-of-way areas, driveways and walkways caused by construction of the new sidewalk must be repaired by the Developer/Contractor at no cost to the Town. Driveway pavement that is within the sidewalk pathway which is in poor condition must be replaced." Also, I recommend a pre-construction survey be conducted with the Contractor and the DPW prior to construction to document pre-construction conditions.~~
- ~~11. Proposed grading design must be added to the Offsite Sidewalk Plans. It appears retaining walls may be necessary to keep the limit of work within the New London Turnpike right of way.~~
- ~~12. A Coventry Sewer Connection Permit Application, West Warwick Sewer Pretreatment Application and a Coventry Soil Erosion Permit Application still need to be submitted for the project.~~

Waivers and ~~Variations~~ Adjustments to be granted by the Planning Commission:

1. Lot Coverage as defined in Section 603.A (Table 6-1, including 05 and Table 6-7); Section 1460; Section 1481.
2. Waivers for wheel blocks, as discussed in tonight's meeting identified in Section 1208.
3. Waiver of the Intensity Regulations in Section 1440.
4. Waiver of General Development Regulations in Section 920B.
5. A physical relief waiver on the survey monuments "sufficient boundary markers shall be adequate".
6. A waiver of Article XIV.F.2, Slopes & Walls, as discussed and based on what's shown on the plans, provided the Applicant will look at fencing where wall heights are excessive.
7. An adjustment from the maximum allowable height of 35' established in Table 6-7 for buildings in the R-20 zone.

Items recommended for the Town Council to waive:

1. Fair Share Development fees for the 31 affordable units
2. Building Permit fees
3. Soil Erosion Certificate fees

4. Soil Erosion Inspection fees
5. Sewer Assessment fee for the 31 affordable or low-to-moderate income units
6. Preliminary and Final Application fees for the 31 low-to-moderate affordable units
7. DPW Sewer Connection Application and Sewer Connection Inspection fees, which total about \$300
8. Recording fees
9. Stenographer fees
10. Real Estate Taxes shall be either deferred or abated until the project receives a Certificate of Occupancy.

In issuing this Decision, the Planning Commission makes the following Findings of Fact:

(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. Coventry's affordable housing rate (by the State's definition) is 5.4%, compared with 8.3% in Rhode Island overall. The Town of Coventry and the CHA should continue to secure all available resources to provide housing for low-income groups, particularly senior citizens, the handicapped and disadvantaged families, including:

- Section 8 Certificates and Vouchers
- Section 8 Substantial Rehabilitation and Moderate Rehabilitation Programs
- Section 202/Section 8 Elderly Housing Program
- Section 202/Section 8 Handicapped Housing Program
- Permanent Housing for the Handicapped Program

The 2005 Affordable Housing Plan Goals states that "While Coventry does currently have housing for the elderly, families, single persons and special needs populations, there is a concern that new housing is focused mainly on single family homes out of the price range of most Coventry residents" (p. 34).

(B) The proposed development is in compliance with the standards and provisions of the municipality's zoning ordinance and subdivision 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. The proposal was granted waivers on two Special Use Permits; for multifamily use and for "Physical Therapy and other Health Related Services" in the R-20 Zoning District. The proposed density of dwelling units (1 unit per 2670 sf) exceeds the standard baseline density for the R-20 zone (one dwelling unit per 20,000 sf) as well as the absolute maximum development density permitted under the Zoning Ordinance for the R-20 zone for cluster/multi-family development (one dwelling unit per 10,000 ft.²).

- (C) All low and moderate income housing units proposed are integrated throughout the development; are compatible in scale and architectural style to the market rate units within the project; and will be built and occupied prior to, or simultaneous with the construction and occupancy of any market rate units.** The applicant has identified that the independent living units that will be low-moderate income, will be distributed throughout the independent living units and identical in all aspects to the “market rate” units.
- (D) There will be no significant negative environmental impacts from the proposed development as shown on the plan presented, with all required conditions for approval.** No significant environmental impacts are anticipated.
- (E) There will be no significant negative impacts on the health and safety of current or future residents of the community, in areas including, but not limited to, safe circulation of pedestrian and vehicular traffic, provision of emergency services, sewerage disposal, availability of potable water, adequate surface water run-off, and the preservation of natural, historical or cultural features that contribute to the attractiveness of the community.** No significant health or safety impacts are anticipated.
- (F) The proposed development will have adequate and permanent physical access to a public street in accordance with the requirements of § 45-23-60 (5).** The proposed development will have adequate and permanent physical access to a public street (New London Turnpike).
- (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.** No new lots are being created as a result of this Major Land Development.



**TOWN OF COVENTRY, RI
DEPARTMENT OF PLANNING & DEVELOPMENT
STAFF REPORT - FOREWORD**

Project Name:	Willow Lakes Independent Living – Approval Reinstatement
Project Type:	Major Land Development/Comprehensive Permit Application
Project Review Phase:	Preliminary Plan
Owner/Applicant:	LRT New London Ave Development, LLC
Address:	New London Turnpike
Plat / Lot / Zone:	AP 16 Lot 3 Zone R-20 Lot Size 12.38 acres
Existing Use:	Vacant Land (former gravel bank)
Proposed Use:	Independent Living Community with Assisted Living and Memory Care Facilities (202 Proposed Units) with 25% affordable Independent Living Units
Description:	Owner/Applicant is requesting a reinstatement of Preliminary Plan approval for a Major Land Development/Comprehensive Permit Application (written decision dated April 13, 2022)

Background

This project previously received Preliminary Plan approval through a Planning Commission decision dated April 13, 2022. (This decision has been included in the meeting packets for reference.) Due to a change of ownership and other factors, the applicant inadvertently allowed the approval to lapse before submitting a Final Plan application. Consistent with their request for a reinstatement of the prior approval, the applicant is not proposing any changes to the version of the project which the Commission reviewed as a Preliminary Plan application in 2022. The application and supporting materials, therefore, are unchanged from that time.

Given these circumstances, Staff have resubmitted the February 9, 2022 Staff Report unchanged and offer the same Recommendation and Stipulations (Conditions of Approval) which our predecessors offered at the time.

Two details are worth highlighting in this Foreword:

1. At Staff’s request, the applicant submitted a letter to the Planning Department dated June 11, 2024 which provides written clarification of how this project meets the requisite 25% affordable threshold to be reviewed as a Comprehensive Permit application when it has been advertised as a 202-unit development with only 31 affordable independent living units. The explanation is that only the 124-unit independent living component of this project includes true dwelling units

consistent with the U.S. Census' definition of housing. The remaining 78 "units" attributable to the assisted living and memory care components of this project are not considered housing per the same definition and are therefore excluded from Rhode Island Housing's calculation of how many affordable housing units must be provided. Staff left the project's description unaltered in public mailers from its 2022-era phrasing since the proposal itself was unaltered, but going forward, Staff would encourage a more nuanced description of the project which better distinguishes between the housing and non-housing aspects of this development.

2. The Town Engineer requested several edits and clarifications to be made to the plan set in his Technical Review Committee comments. (The TRC report has been included in meeting packets.) Staff recommends conditioning these items to Final Plan so that the Commission can first address the applicant's request to reinstate prior Preliminary Plan approval.

Staff Recommendation

Staff recommend that the Planning Commission **approve** the Preliminary Plan reinstatement request, consistent with the stipulations and requests for waivers contained within the original written decision dated April 13, 2022 (with "new" 2024 additions highlighted in yellow):

Stipulations

1. The Applicant shall obtain approval from Kent County Water Authority for the public water connection.
2. The Applicant shall receive approval from the Coventry Sewer Subcommittee, if required.
3. The Applicant be allowed to proceed to Final Plan administratively.
4. The Planning Director's Report is incorporated into this Decision.
5. The Town Engineer's Report, dated April 21, 2021 shall be incorporated into this decision. It is noted that all 12 items in the report were satisfied.
6. The applicant will address the Town Engineer's comments as listed in the Technical Review Committee Report for this project dated June 17, 2024 with its Final Plan application.

Waivers and Variances to be granted by the Planning Commission:

1. Lot Coverage as defined in Section 603.A (Table 6-1, including 05 and Table 6-7); Section 1460; Section 1481.
2. Waivers for wheel blocks, as discussed in tonight's meeting identified in Section 1208.
3. Waiver of the Intensity Regulations in Section 1440.
4. Waiver of General Development Regulations in Section 920B.

5. A physical relief waiver on the survey monuments "sufficient boundary markers shall be adequate".
6. A waiver of Article XIV.F.2, Slopes & Walls, as discussed and based on what's shown on the plans, provided the Applicant will look at fencing where wall heights are excessive.

Items recommended for the Town Council to waive:

1. Fair Share Development fees for the 31 affordable units
2. Building Permit fees
3. Soil Erosion Certificate fees
4. Soil Erosion Inspection fees
5. Sewer Assessment fee for the 31 affordable or low-to-moderate income units
6. Preliminary and Final Application fees for the 31 low-to-moderate affordable units
7. DPW Sewer Connection Application and Sewer Connection Inspection fees, which total about \$300
8. Recording fees
9. Stenographer fees
10. Real Estate Taxes shall be either deferred or abated until the project receives a Certificate of Occupancy.

In issuing this Decision, the Planning Commission makes the following Findings of Fact:

(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. Coventry's affordable housing rate (by the State's definition) is 5.4%, compared with 8.3% in Rhode Island overall. The Town of Coventry and the CHA should continue to secure all available resources to provide housing for low-income groups, particularly senior citizens, the handicapped and disadvantaged families, including:

- Section 8 Certificates and Vouchers
- Section 8 Substantial Rehabilitation and Moderate Rehabilitation Programs
- Section 202/Section 8 Elderly Housing Program
- Section 202/Section 8 Handicapped Housing Program
- Permanent Housing for the Handicapped Program

The 2005 Affordable Housing Plan Goals states that "While Coventry does currently have housing for the elderly, families, single persons and special needs populations, there is a concern that new housing is focused mainly on single family homes out of the price range of most Coventry residents" (p. 34).

- (B) The proposed development is in compliance with the standards and provisions of the municipality's zoning ordinance and subdivision 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.** The proposal was granted waivers on two Special Use Permits; for multifamily use and for "Physical Therapy and other Health Related Services" in the R-20 Zoning District. The proposed density of dwelling units (1 unit per 2670 sf) exceeds the standard baseline density for the R-20 zone (one dwelling unit per 20,000 sf) as well as the absolute maximum development density permitted under the Zoning Ordinance for the R-20 zone for cluster/multi-family development (one dwelling unit per 10,000 ft.²).
- (C) All low and moderate income housing units proposed are integrated throughout the development; are compatible in scale and architectural style to the market rate units within the project; and will be built and occupied prior to, or simultaneous with the construction and occupancy of any market rate units.** The applicant has identified that the independent living units that will be low-moderate income, will be distributed throughout the independent living units and identical in all aspects to the "market rate" units.
- (D) There will be no significant negative environmental impacts from the proposed development as shown on the plan presented, with all required conditions for approval.** No significant environmental impacts are anticipated.
- (E) There will be no significant negative impacts on the health and safety of current or future residents of the community, in areas including, but not limited to, safe circulation of pedestrian and vehicular traffic, provision of emergency services, sewerage disposal, availability of potable water, adequate surface water run-off, and the preservation of natural, historical or cultural features that contribute to the attractiveness of the community.** No significant health or safety impacts are anticipated.
- (F) The proposed development will have adequate and permanent physical access to a public street in accordance with the requirements of § 45-23-60 (5).** The proposed development will have adequate and permanent physical access to a public street (New London Turnpike).
- (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.** No new lots are being created as a result of this Major Land Development.



TOWN OF COVENTRY, RI
DEPARTMENT OF PLANNING & DEVELOPMENT
PLANNING DIRECTOR'S REPORT

Project Name:	Willow Lakes Independent Living
Plan Type:	Major Land Development/Comprehensive Permit Application
Plan Review Phase:	Preliminary Plan
Owner/Applicant:	New London Turnpike Realty, LLC/Willow Lake Properties, LLC
Address:	New London Turnpike
Plat / Lot / Zone:	AP 16 Lot 3 Zone R-20 Lot Size 12.38 Acres
Existing Use:	Vacant Land (Former Gravel Bank)
Proposed Use:	Independent Living Community with Assisted Living and Memory Care Facilities (202 Proposed Units) with 25% affordable Independent Living Units.
Description:	The Applicant proposes to construct a 3-story, 84,000 sf building with a total of 202 units. The complex would include 124 independent living units, 48 assisted living units and 30 memory care units.

Project Background

This matter comes before the Planning Commission for Preliminary Plan Approval of a proposed Independent Living, Assisted Living, and Memory Care development to consist of 202 units located in 3 separate wings of one 84,000 building. The site is +/- 12.38 acres in area and is located in the R20 District.

The proposed project is to consist of 124 independent living units. The Independent Living Units are to include 107 "one-bedroom units" and 17 "two-bedroom units". The development will also consist of an additional 48 Assisted Living Units. Completing the development will then be an additional 30 units in a memory care facility connected to the Assisted Living portion of the building. Also located on the site is a proposed 286 vehicle parking lot. The project will be serviced by public water and sewer and will have one access drive off of New London Turnpike.

The project is located on the site that was previously approved for the Sherwood Village development. This development was to consist of 168 units in 7 separate buildings with another building to house a recreation facility. Additionally, as this development was permitted through the Comprehensive Permit process pursuant to the Low and Moderate Income Housing Act, 30% of the units (51 total) were to be "affordable". Tiffany Village (formerly Sherwood Village) received Preliminary Plan approval from the Planning Commission in March of 2012 and Final Plan approval in September of 2015. To date, the development has not been built.

Existing Conditions

As previously stated, this site was the site of a former commercial gravel operation. The majority of the property primarily consists of exposed gravel. There are no existing structures situated on the parcel and there are no freshwater wetlands on the subject property. However, there are jurisdictional wetland buffers on the northwest corner of the property. The wetland features themselves are located on adjacent parcels. The property is also located in Zone X, which is determined to be an area outside the 0.2% chance of flooding according to the Flood Insurance rate Maps. The majority of the property has soil types that are suitable for community development. The adjacent roadway has public water and sanitary sewer to service the site.

Proposed Development

The proposed development is the construction of a three-story, 84,000 sf building with three separate wings consisting of independent living units, assisted living units and memory care units, office space and dining facilities. The project is applying under the Comprehensive Permit Application process. The Applicant is proposing 31 low and moderate income units, which is 25% of the 124 proposed independent living units.

The prior approved development, Sherwood Village, received a Letter of Eligibility (LOE) from Rhode Island Housing (RIH) for an apartment complex consisting of 192 housing units, that included 49 affordable units. This LOE was issued in 2009 and a second letter was received from RIH in 2017, indicating that a new LOE was not required because *"Modifications to the development proposal resulting from local review do not require a revised letter of eligibility."* The Applicant has identified that the Coventry Housing Authority shall be the monitoring agent for the project.

Trip Generation

A trip generation memo was prepared by Bryant Associates and they compared the proposed number of vehicle trips from Willow Lakes to the traffic generated by the previously approved Sherwood Village.

During the AM Peak Hour, the memo estimates that there will be 48 vehicle trips and 85 vehicle trips during the PM Peak Hour. The Traffic Impact Study prepared for Sherwood Village, estimated 98 vehicle trips during the AM Peak Hour and 123 vehicle trips during the PM Peak Hour. The memo estimates that Willow Lakes will generate 51% less vehicle trips during the AM Peak Hour and 38% less vehicle trips during the PM Peak Hour than was estimated for Sherwood Village.

Fiscal Impact Study

A Fiscal Impact Study was prepared by Joe Lombardo, AICP that indicates that *"The Town of Coventry will realize total estimated Net Revenues of \$654,278 from property taxes on an*

annual basis with the development of the proposed Willow Lake Development." A copy of this study has been included in your packet.

Project Approval Requirements

Article 6, Table 6-1 of the Coventry Zoning Ordinance lays out what uses are permitted, prohibited, or allowed by Special Use Permit in each district. As is often the case with zoning ordinances and their accompanying use tables, new development trends and uses do not often fit neatly in to the table of uses. This project is a perfect example of this.

Looking first at the proposed development, a reasonable argument could be made that this constitutes a "Multi-Family Dwelling Project", which is defined as "a dwelling containing more than two (2) dwelling units for occupancy of families living independently of each other, including apartment houses, apartment hotels, and flats."¹ Such use is allowed by Special Use Permit in the R20 zoning district.²

Unfortunately, neither Assisted Living nor Memory Care are uses explicitly defined in the Zoning Ordinance. While an argument could be made that they are both simply a modified form of a "Multi-Family Dwelling Project", or an accessory/second use to it, the notion that the Memory Care portion will contain "beds" and not units and will likely have a professional/medical service aspect to it detracts from this argument.

After looking through the Zoning Ordinance, the following option, in addition to multi-family dwelling, should be considered for permitting the assisted living & memory care portions of the project. The Applicant has chosen that the Assisted Living and Memory Care Units be treated as a "Physical Therapy and other Health Related Services". Said use is allowed in the R20 zoning district with a Special Use-Permit.³

Additionally, Article 14 §1460 of the Zoning Ordinance lays out specific requirements for multi-family dwelling buildings. These include a 40' required front yard area to be landscaped or left as a natural buffer; requirements for rubbish disposal for each building; restrictions on dwelling unit sizes; and provision of pedestrian walkways, among others.⁴

This proposed project will need to receive either amended or new approvals for the following items:

- Connection to public water (KCWA)
- Letter of Eligibility (Rhode Island Housing)
- Connection to public sewer (Coventry Sewer Subcommittee)

¹ *See* Coventry Zoning Ordinance Article 2 §210. (50)

² *See* Coventry Zoning Ordinance Article 6 §603, Table 6-1.A

³ *See* Coventry Zoning Ordinance Article 6 §603, Table 6-1.E.1

⁴ *See* Coventry Zoning Ordinance Article 14 §1460

- Fire District Approval (Central Coventry Fire District)
- RIPDES Permit (RIDEM)
- Wetlands Permitting, potentially including Preliminary Determination and Insignificant Alteration (RIDEM)
- Special Use Permit for Multi-Family Dwellings or other uses (Planning Commission via the Comprehensive Permit Process)
- Any additional waivers from the Zoning Ordinance (Planning Commission via the Comprehensive Permit Process)

The Comprehensive Permit Process

Coventry adopted its Affordable Housing Ordinance in response to a state statutory mandate that all communities develop at least 10% of their housing stock as low and moderate income housing by 2025. As of June 2017, 5.36% of Coventry’s housing stock was categorized as ‘low or moderate income’ housing. Accordingly, a substantial number of new affordable housing units are required for Coventry to meet the state-mandated 10% threshold within the next 6 years.

A Comprehensive Permit differs from a typical Major Land Development project in that the Planning Commission becomes a “one-stop permitting authority” with the same power to issue any permits or approvals that any local board or official would otherwise issue with respect to the application.⁵ This includes the power to grant or deny requests for waivers or relief from Town ordinances and regulations normally handled by other boards such as the Zoning Commission,⁶ as well as the power to attach conditions to its approval in terms of dimensions, layout, building materials, attractiveness and other design elements.⁷

In addition to the standard Application for Preliminary Plan Review, the applicant has submitted a separate Application for Comprehensive Permit that includes the following required materials:

1. A letter of eligibility from Rhode Island Housing.
2. A written list specifying any relief requested from Coventry’s ordinances & regulations from which the applicant is seeking relief. (*See “Relief Requested,” below.*)
3. A proposed timetable for the commencement of construction and completion of the project. (*July 2021– June 2022.*) **Will Need to be updated.**
4. Identification of the Coventry Housing Authority as the approved entity to monitor the long-term affordability of the low & moderate income housing units.

⁵ *See* Coventry Ordinance Chapter 139-4 and R.I.G.L. § 45-53-4(a)(4)(vi).

⁶ *See* Coventry Ordinance Chapter 139-14.

⁷ *See* Coventry Ordinance Chapter 139-12.

The Planning Commission may also request additional, reasonable documentation, throughout the public hearing, including but not limited to, opinions of experts, credible evidence of application for necessary federal and/or State permits and advice from other boards.⁸

To **approve** a Comprehensive Permit the Planning Commission **shall** make positive findings of fact, supported by competent evidence of record on **each** of the following provisions:

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 simultaneous 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.

The Planning Commission **may deny** a Comprehensive Permit for **any** of the following reasons:

The Town has an approved affordable housing plan and is meeting housing needs.

1. The proposal is not consistent with the local needs identified in the Town's Comprehensive Community Plan.
2. The proposal is not in conformance with the Comprehensive Plan.
3. The community has met or plans to meet the goal of ten percent (10%) of low & moderate income housing.
4. Concerns for the environment and the health and safety of current residents have not been adequately addressed.
5. **"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

⁸ Id

or of the residence (sic) of the...town, to promote better building design in relation to the surroundings, or to preserve open spaces...⁹

Relief Requested

The Comprehensive Permit application includes a long list of relief and waivers that the Planning Commission is requested to grant as the sole reviewing authority for the Comprehensive Permit:

A. **Special Use Permit** (Zoning Ordinance Art. 4, § 430.)

The applicant has requested a Special Use Permit to build multifamily housing in an R/20 zone in accordance with Art. 6, Table 6-1, Line 05.

B. **Special Use Permit** (Zoning Ordinance Section 603.E/Table 6-1E.1.05)

The applicant has requested a Special Use Permit to allow "Physical Therapy and other Health Related Services" be approved for an R20 Zoning District.

The Commission may grant the requested SUP if it finds that evidence has been presented on the record to its satisfaction that the proposed project meets the standards listed in Zoning Ordinance Art. 4, § 432 regarding:

- Safe ingress & egress relative to vehicles, pedestrians, traffic flow and emergency access;
- Off-street parking;
- Trash, storage & delivery areas;
- Utilities;
- Screening & buffering;
- Signs & exterior lighting;
- Required yards & open space;
- Compatibility with abutting lots;
- Compatibility with the Comprehensive Plan; and
- The use will not create conditions inimical to public health, safety, welfare & morals.

B. **Zoning Variances & Fee Waivers** (Zoning Ordinance Art. 4, § 450.)

The applicant requests variances to 3 physical requirements and waivers of 5 fees imposed by the Coventry Zoning Ordinance.

⁹ R.I.G.L. § 45-53-3(4)

Ordinance Sec.		Physical Variances Requested
Sec. 603.A. (tbl. 6-1, ln. 05 & tbl. 6-7); Sec. 1460; Sec. 1481	Lot Coverage	The applicant requests relief for lot coverage from 20% to 50% coverage. Per Table 6-10, the maximum lot coverage for “other permitted uses” in an R/20 zone = 20%. However, the comments to Table 6-1, line 05, also direct the reader to Art. 14. on matters regarding multifamily uses. Art. 14, Sec. 1461 addresses standards for multifamily buildings but does not include a standard for coverage. Art. 14, Sec. 1481 requires that <u>at least</u> 40% of the property be maintained as open space, of which no more than 50% can be land unsuitable for development. By comparison, maximum lot coverage for 2-family units in cluster designs and multifamily units in conservation designs (with water & sewer) is 25%. (See Tables 6-8 and 6-10.)
Sec. 1208	Wheel Blocks	The applicant requests relief that concrete curbing or an asphalt berm be allowed as a “suitable device” in lieu of wheel blocks to prevent vehicles from encroaching beyond parking areas.
Sec. 1440	Intensity Regulations	The underlying residential zone (R20) shall serve as a guide for the maximum number of dwelling units (du), this equates to 2.18 du per acre. The Applicant seeks relief to allow for 16.3 du per acre.
Sec. 920B	General Dev. Regs	In front yards, the maximum height of walls and fences shall be four feet. A 6’ fence is proposed between the proposed stormwater facilities and the proposed sidewalk, a Department of Public Works request.
		Fee Waivers Requested
Sec. 106-6	Fair Share Devel. Fee	Applicant requests a full waiver of all Fair Share Development Fees. <i>(Est.: 202 units * \$7,596 = \$1,534,392.00)</i>
Sec. 106-4	Bldg. Permit Fees	Applicant requests a full waiver of all Building Permit fees. <i>(Est.: \$1,705 = \$2.00 per every \$1,000 over \$500,000 bldg. cost)</i>
Sec. 122-2	Soil Erosion Cert. Fee	Applicant requests a full waiver of all site plan review and certification fees. <i>(Est: \$650.00)</i>
Sec. 122-2	Soil Erosion Insp. Fee	Applicant requests a full waiver of all inspection fees. <i>(Est: \$150 + (12.4 acres * \$90) = \$1,266.00)</i>
Sec. 122-2	Sewer Assess. Fee	Applicant requests a full waiver of all Sewer Assessment fees. <i>(Est: 202 units * \$6,600 = \$1,333,200.00) Assessment needs verification.</i>

In considering requests for Zoning Variances in a Comprehensive Permit application, the Planning Commission follows the same procedures that the Zoning Commission would follow under Art. 4, § 450 of the Zoning Ordinance. Under these procedures, the Planning Commission may grant an application for a variance because of hardship when it finds that evidence has been presented on the record that demonstrates to its satisfaction that the following standards listed in Art. 4, §§ 454 and 455 are met:

- The hardship from which the applicant seeks relief is due to the unique characteristics of the property and not due to the general characteristics of the area or to the physical or economic disability of the applicant;
- The hardship from which the applicant seeks relief not the result of a prior action of the applicant;

- The hardship from which the applicant seeks relief is not primarily related to the applicant’s desire for financial gain;
- Granting the variance will not alter the general character of the surrounding area, the Zoning Ord. or Comprehensive Plan;
- The variance that will be granted is the least relief necessary;
- The property will not yield any beneficial use if required to comply with the requirement of the Zoning Ordinance; and
- For dimensional variances, that the hardship to be suffered without the variance would be more than a mere inconvenience – meaning that there is no other reasonable alternative to enjoy a legally permitted use of the property.

In addition, the Commission must consider any application for a variance in light of the Comprehensive Plan and the Commission must give its reasons for granting or denying any variance in writing.

C. Subdivision Regulation Relief Requested

The applicant seeks relief from the following physical and fee-related provisions of the Subdivision & Land Development Regulations:

Sec.		Physical Relief Requested
Art. XIII.B.15	Monuments	The applicant requests that “sufficient boundary markers be provided” in accordance with the “Rules and Regulations for Professional Land Surveying in the State of Rhode Island.” No provision can be located that either authorizes relief from this requirement or requires the Town to provide monuments on the applicant’s behalf.
Art. XIV.F.2	Slopes & Walls	The applicant requests relief authorizing an increase in maximum slopes allowed from 3-to-1 to 2-to-1. The applicant requests relief that authorizing an increase in the maximum wall height from 4’ to 10’ relative to both an existing boulder wall and proposed engineered walls.
		Fee Relief Requested
Art. XI.C.3.c		Applicant requests a full waiver of all Preliminary Application fees. <i>(Est.: \$250 + (202 units * \$20) = \$4,290.00)</i>
Art. XI.C.3d.		Applicant requests a full waiver of all Final Application fees. <i>(Est.: \$500 + (202 units * \$20) = \$4,540.00)</i>

Pursuant to Art. VIII.B. of the Subdivision Regulations, the Planning Commission may grant waivers or modifications where it finds that:

- The waiver or modification is reasonable and within the general purposes and intents of the regulations; and
- Literal enforcement of the regulation is impracticable and will exact undue hardship because of peculiar conditions pertaining to the land in question; or waiver or modification is in the best

interest of good planning practice as evidenced by consistency with the Comprehensive Plan and Zoning Ordinance.

D. Miscellaneous Additional Fee-Related Relief Requested

The applicant also seeks waivers of the following municipal fees imposed by other town departments:

Fee	Fee Relief Requested
DPW Sewer Connection Applic. Fee	Applicant requests a full waiver of all Sewer Connection Application fees. <i>(Est: \$100.00)</i>
DPW Sewer Connection Insp. Fee	Applicant requests a full waiver of all Sewer Connection Inspection fees. <i>(Est: \$200.00)</i>
Recording Fees	Applicant requests a full waiver of all Recording fees.
Stenographer Fees	Applicant requests a full waiver of all Stenographer fees.
Real Estate Taxes	Applicant requests that the Town defer or abate the reassessment of real estate taxes on each unit until a Certificate of Occupancy is issued.

Planning Commission Decision

The Planning Commission is requested to consider:

- 1) Whether or not the proposal meets the requirements for a Comprehensive Permit OR
- 2) Whether or not to approve the Preliminary Plan Submittal and
- 3) Whether or not to grant the requested waivers submitted by the applicant see above).

Stipulations for Consideration

By DPW, Town Engineer

The Planning Commission is advised to read the attached memo prepared by the Town Engineer for stipulations to consider.

Required Findings of Fact under the Comprehensive Permit

To approve a Comprehensive Permit the Planning Commission shall make positive findings of fact, supported by competent evidence of record on each of the following provisions:

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 simultaneous 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.

The Planning Commission may deny a Comprehensive Permit for any of the following reasons:

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.
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.
6. "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.

COMPREHENSIVE PERMIT FINDINGS OF FACT

Willow Lakes Independent Living

(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.

_____ Consistent with the local comprehensive plan/affordable housing plan OR

_____ Not Consistent with the local comprehensive plan/affordable housing plan.

Considerations:

- Coventry's affordable housing rate (by the State's definition) is 5.4%, compared with 8.3% in Rhode Island overall.
- The Town of Coventry and the CHA should continue to secure all available resources to provide housing for low-income groups, particularly senior citizens, the handicapped and disadvantaged families, including:
 - Section 8 Certificates and Vouchers
 - Section 8 Substantial Rehabilitation and Moderate Rehabilitation Programs
 - Section 202/Section 8 Elderly Housing Program
 - Section 202/Section 8 Handicapped Housing Program
 - Permanent Housing for the Handicapped Program
- The 2005 Affordable Housing Plan Goals states that "While Coventry does currently have housing for the elderly, families, single persons and special needs populations, there is a concern that new housing is focused mainly on single family homes out of the price range of most Coventry residents" (p. 34).

(B) The proposed development is in compliance with the standards and provisions of the municipality's zoning ordinance and subdivision 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.

_____ The proposed development IS compliant with Coventry's zoning ordinance, subdivision regulations or local concerns OR

_____ The proposed development is Not Compliant with Coventry's zoning ordinance, subdivision regulations or local concerns.

Considerations:

- The proposal will require two Special Use Permits; for multifamily use and for "Physical Therapy and other Health Related Services" in the R-20 Zoning District.¹⁰
- The proposed density of dwelling units (1 unit per 2670 sf) exceeds the standard baseline density for the R-20 zone (one dwelling unit per 20,000 sf) as well as the absolute maximum development density permitted under the Zoning Ordinance for the R-20 zone for cluster/multi-family development (one dwelling unit per 10,000 ft.²).¹¹
- The application sought full waivers of many development fees, including fees applicable to market rate units as well as affordable units.

(C) All low and moderate income housing units proposed are integrated throughout the development; are compatible in scale and architectural style to the market rate units within the project; and will be built and occupied prior to, or simultaneous with the construction and occupancy of any market rate units.

_____ Yes, low to moderate income housing units are integrated throughout the development
OR

_____ No, low to moderate income housing units are NOT integrated throughout the development.

Considerations:

- The applicant should identify the units that will be low-moderate income, and ensure that they will be distributed throughout the independent living units.

(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.

_____ The plan WILL have significant environmental impacts from the proposed development as shown on the final plan, with all required conditions for approval OR

_____ The plan will NOT have significant environmental impacts from the proposed development as shown on the final plan, with all required conditions for approval.

(E) There will be no significant negative impacts on the health and safety of current or future residents of the community, in areas including, but not limited to, safe circulation of pedestrian

¹⁰ [Coventry Zoning Ordinance, § 600, A Residential, Table 6-1.](#)

¹¹ Coventry Zoning Ordinance, Art. 14, § 1440.A. and Art. 6, Table 6-8.

and vehicular traffic, provision of emergency services, sewerage disposal, availability of potable water, adequate surface water run-off, and the preservation of natural, historical or cultural features that contribute to the attractiveness of the community.

_____ The plan WILL have significant impacts on the health and safety of current or future residents in the community as described above OR

_____ The plan will NOT have significant impacts on the health and safety of current or future residents in the community as described above.

(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).

_____ All proposed land developments and lots WILL have adequate and permanent physical access to a public street as described above OR

_____ All proposed land developments and lots WILL NOT have adequate and permanent physical access to a public street as described above.

(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.

_____ The proposed development WILL NOT result in the creation of individual lots with physical constraints to development as described above OR

_____ The proposed development WILL result in the creation of individual lots with physical constraints to development as described above.



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: April 20, 2026
PROJECT NAME: "Willow Lakes Independent Living"
PROPERTIES: AP 16, Lot 3
ADDRESS: New London Turnpike
ZONE: R-20 (Residential)
OWNER/APPLICANT: LRT New London Ave Development, LLC

This matter came before the Coventry Technical Review Committee at its April 20, 2026 meeting as a Preliminary Plan for a Major Land Development in accordance with Article V, § D.4. of the Coventry Subdivision & Land Development Regulations.

An application and plan set were submitted for review on February 11, 2026, and revised materials were submitted on March 31, 2026. The applicant seeks an Amendment to their previous Preliminary Plan approval for a proposed 202-unit independent living community with assisted living and memory care facilities. As a Comprehensive Permit application, 25% of the independent living units must be deed-restricted as affordable. No site design changes are proposed; the amendment includes only a new regulatory adjustment to exceed the maximum building height requirements.

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

Willow Lakes Independent Living - Preliminary Plan Reinstatement Decision - 07-10-2024.pdf
Willow Lakes Independent Living - Applicant Response Letter.pdf
Willow Lakes Independent Living - Architectural Elevations with Building Height.pdf
Willow Lakes Independent Living - Construction Drawings.pdf
Willow Lakes Independent Living - Height Adjustment Letter.pdf
Willow Lakes Independent Living - Preliminary Plan Decision - 04-13-2022.pdf

PRINCIPAL PLANNER

1. This project requires an amendment to its previous Preliminary Plan approval to add a new regulatory adjustment. The proposed building height will exceed the maximum allowable height. This adjustment was not requested by the applicant nor was it granted by the Planning Commission as part of the previous approval. The buildings will be three stories tall, with a pitched roof configuration. The proposed maximum building height will be approximately 60' for Building 1, where the maximum is 35' per zoning code. Buildings 2 and 3 will be approximately 54' tall.
2. Planning staff note that the abutting properties to the south were subject to an approved Zone Change as part of the mixed-use development entitled "Coventry Centre." That Zone Change set the maximum allowable buildable height at 65' subject to certain conditions.

TOWN ENGINEER

- A) A town Soil Erosion and Sediment Control Permit will be required from the Town Engineering Office prior to any ground disturbing activities.
- B) 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. A certificate of occupancy will not be issued until COC is received and accepted by the town.

PUBLIC WORKS DIRECTOR

- No comments at this time.

FIRE REPRESENTATIVE

- Water supply for fire protection shall meet the minimum requirements per Fire Code for the size and occupancy use of the building.
- Fire hydrants, used to supply FDC- Fire Department Connections, shall not exceed the maximum distance from the FDC's per Fire Code.
- The site plans that are included did not appear to show fire hydrants or FDC connections on site or at New London Turnpike.
- The asphalted areas around the building, including the entrance road, appear to meet the minimum width for fire apparatus.

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.