



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

STAFF REPORT

Project Name:	Village at Tiogue
Plan Type:	Comprehensive Permit / Major Land Development
Plan Review Phase:	Preliminary Plan
Owner/Applicant:	232 Realty Associates
Address:	Tiogue Avenue, Tiffany Road, East Shore Drive, & Minglewood Drive
Plat / Lot / Zone:	AP 32 Lots 149, 150, 151, & 153 Zone R-20 Lot Size 26.99 acres
Existing Use:	Vacant / Open Space
Proposed Use:	176 Single- and Multi-Family Units
Description:	Applicant proposes to develop 176 units comprised of a mix of single-family units and multi-family units on approximately 27 acres of land as a Comprehensive Permit. A minimum of 25% of the proposed units must be deed-restricted as affordable. Site access is proposed from Tiogue Avenue, Tiffany Road, East Shore Drive, and Minglewood Drive. Public water and sewer access to the development is anticipated.

Background and Process

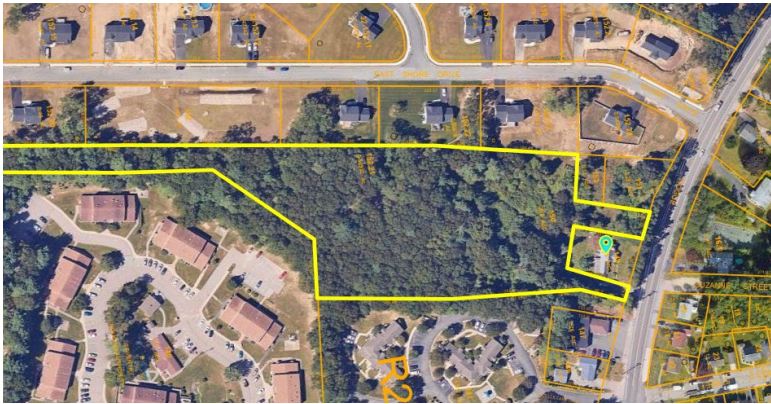
This item will be reviewed as a Preliminary Plan Application for a proposed Comprehensive Permit / Major Land Development of an approximately 27-acre subject parcel comprised of four lots: AP 32, Lots 149, 150, 151, & 153. This project previously came before the Planning Commission as a Pre-Application Plan in July 2024.

A Comprehensive Permit is an application where, according to RIGL §45-53-4, *“Any applicant proposing to build low- or moderate-income housing may submit to the local review board a single application for a comprehensive permit to build that housing in lieu of separate applications to the applicable local boards. This procedure is only available for proposals in which at least twenty-five percent (25%) of the housing is low- or moderate-income housing.”* In exchange for these affordable units, the applicant is given a density bonus for the number of units they are allowed to build on the property. Relevant to this case, State Law § 45-53-4 (b)(1)(i) states *“For properties connected to public sewer and water, or eligible to be connected to public sewer and water based on written confirmation from each respective service provider, the density bonus for a project that provides at least twenty-five percent (25%) low- and moderate-income housing shall be at least five (5) units per acre.”*

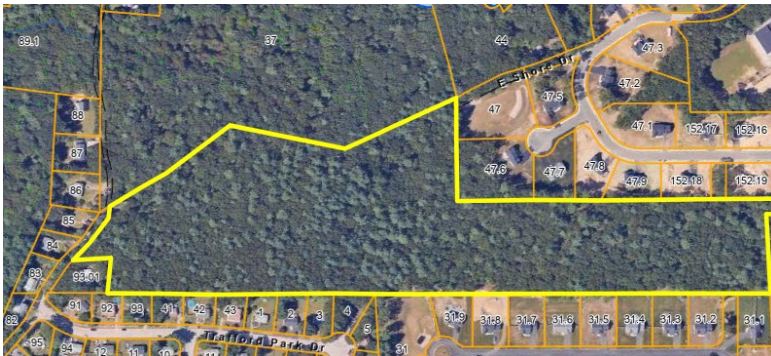
In addition to the increase in density, the applicant can also seek adjustments and waivers from the local Zoning Code and Subdivision Regulations to achieve their project vision. State law also provides for a single body to act on all forms of land use relief as it relates to the Comprehensive Permit. More

particularly, state law provides that *“The local review board has the same power to issue permits or approvals that any local board or official who would otherwise act with respect to the application, including, but not limited to, the power to attach to the permit or approval, conditions, and requirements with respect to height, site plan, size or shape, or building materials, as are consistent with the terms of this section.* For Coventry, this is the Planning Commission. As such the Planning Commission has the authority to grant adjustments and waivers for land use relief.

Existing Conditions



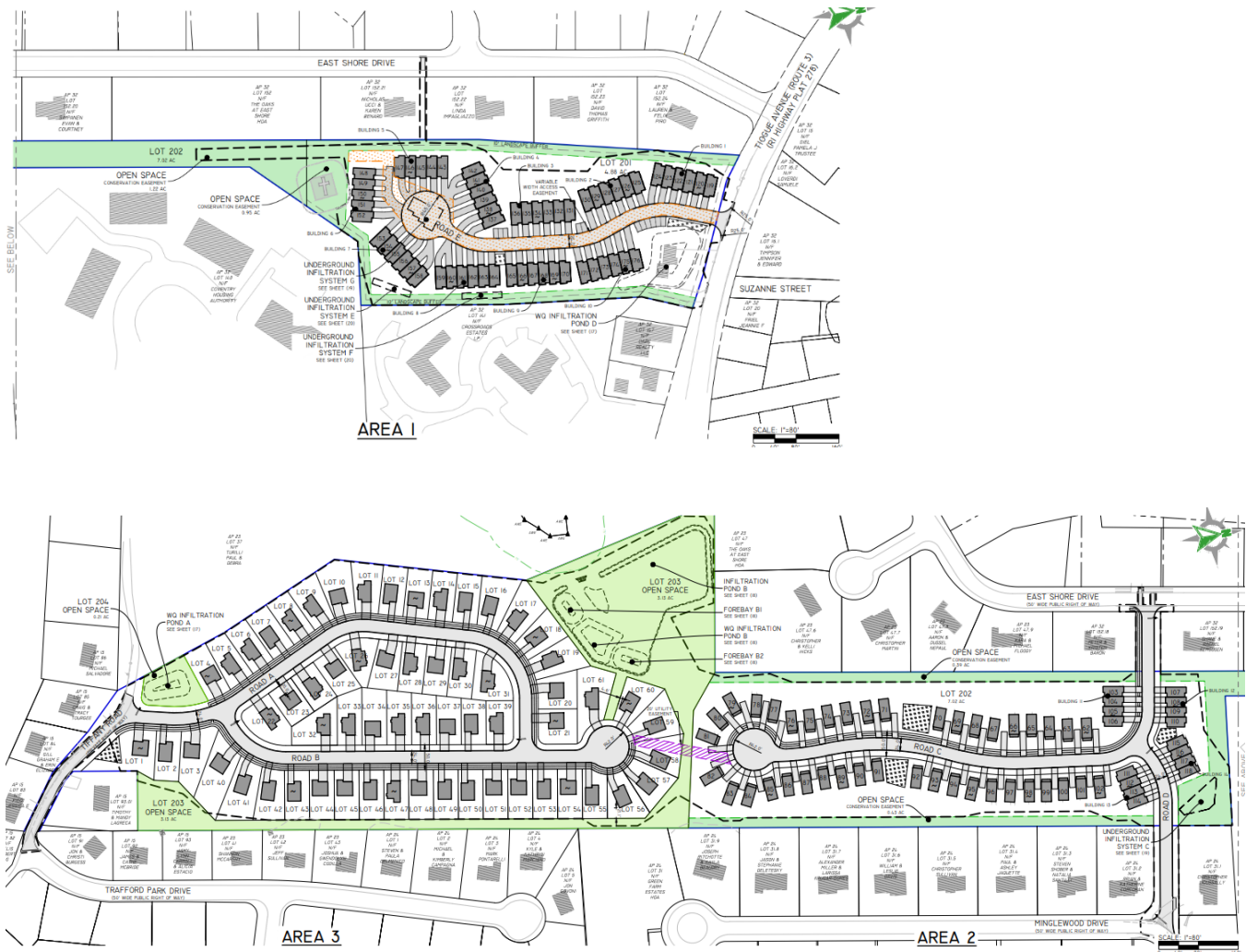
The parcel is zoned R-20 (Residential) and consists of roughly 27 acres of mostly undeveloped land. AP 32, Lot 149 currently hosts one (1) single-family dwelling with the address 232 Tiogue Avenue. A historic cemetery, designated as #CY076, is also located in the northern section of the property. The applicant indicated in the project narrative that there are no wetlands on the site.



The abutting properties are zoned R-20 and consist of either residential uses or vacant, wooded parcels. The subject parcel is directly abutted by two affordable multi-family developments, North Road Terrace and Coventry Crossroads. Tiogue Elementary School is also located nearby, at 170 East Shore Drive.

The site is located east of Tiogue Lake and has frontage on Tiogue Avenue. The site also has frontage on East Short Drive (via a 50' unimproved right-of-way connection), Minglewood Drive (via another 50' unimproved right-of-way connection), and Tiffany Road. The Traffic Impact Study submitted by the applicant notes that Tiffany Road varies in width, from 10' to 20' with no curbing or sidewalks, and the “pavement is in poor to fair condition with visible cracking, bituminous patches and temporary utility patching.” The eastbound section of Tiffany Road, from New London Turnpike to Old North Road, are very narrow at 10' to 12' wide. The western section of Tiffany Road, from Old North Road to the proposed site access road, is generally 15' to 16' wide.

Proposed Conditions – Housing



The applicant has submitted a conceptual site plan and narrative for “Village at Tiogue” indicating its intent to develop 176 residential units (with associated parking, landscaping, and utilities) of varying types. The project will be broken up into three distinct areas. Area 1 will host 58 walk-up attached multi-family units with an attached 1-car garage (referred to as “single-family attached units” in the project narrative), each of which will have 2 or 3 bedrooms and about 1,400 SF of finished living space. Area 1 will have access to Tiogue Ave to the north. Area 2 will consist of 57 total units, comprised of 16 walk-up attached multi-family units and 41 single-family condominiums (referred to as “single-family cottages” in the narrative), with access on both East Shore Drive and Minglewood Drive, via their respective 50’ right-of-way. The single-family condominiums will have about 1,600 SF of finished living space and an additional 800 SF unfinished basement. Area 3 will have 61 detached single-family dwellings that would have access to Tiffany Road to the south. The detached single-family dwellings will vary in size, ranging from 1,000 to 2,000 SF in finished living space, and may include detached garages, room additions, finished walk-out basements, finished second floors, or other amenities.

As this is a Comprehensive Permit, this project would include 25% of the units being deed-restricted as Low- and Middle-Income Housing. The applicant has designated 44 units (exactly 25%) as affordable, the location of which is shown on Sheet 8 of the plan set. The applicant provided a response to the October Technical Review Committee (TRC) review, dated November 10, 2025, which listed those specific units that will be designated as affordable. The applicant has not yet identified a monitoring agent for the LMI units.

Proposed Conditions – Roadway Design, Off-Site Improvements, and Sidewalks

Roadway design, maintenance, and improvements are crucial aspects of the overall development. As part of the Preliminary Plan submission, the applicant provided Planning staff with a Traffic Impact Study prepared by Crossman Engineering. At the request of Planning staff, the PARE Corporation completed a Peer Review Report, dated October 31, 2025, based upon the applicant's Traffic Impact Study and Plan Set. Members of the Technical Review Committee provided comments in the enclosed TRC Report to indicate their concurrence with the peer reviewer's recommendations contained therein.

To start, the applicant has indicated it is offering optionality on the proposed ownership of the internal access roadways as either privately or publicly owned. In earlier correspondence between Planning Staff and the applicant, the Town indicated that all proposed internal roadways should be privately owned and maintained. In the response to the October TRC review, the applicant requested an adjustment from sewer assessments if the internal access roadways are to be privately owned and maintained.

The proposed internal roadway design poses several issues for public safety and traffic circulation. The applicant proposes for the internal access roadways in Areas 2 and 3, labelled as Roads A, B, and C in the site plans, to culminate in a cul-de-sac. This layout leaves the single-family condominium units and attached multi-family units in Area 2 disconnected from the detached single-family homes in Area 3. At both the October and November TRC meetings, Engineering, Police, Fire, and DPW agreed that the lack of a through-road connection creates safety and access concerns for emergency responders. This is consistent with the Peer Review Report that states that the through-road connection will reduce the length of travel for emergency responders and everyday motorists travelling to New London Turnpike or Tiogue Avenue. In their response to the Peer Review, dated November 5, 2025, the applicant stated that they will agree to construct a through-road connection if the roadways are acceptable as public. Planning staff maintain that the ownership and maintenance of the internal roadways is a separate issue from roadway safety, and safety is of paramount concern.

The poor condition and narrow width of Tiffany Road also presents safety risks for emergency response and residents in the area, inclusive of the future residents of the proposed development. Consistent with the Peer Review Report, Planning staff recommends that the applicant make off-site improvements to the full length of Tiffany Road, from New London Turnpike to the site access road for Area 3 of the proposed development.

The "western" section of Tiffany Road, from the proposed site access road to the intersection with Old North Road should have pavement improvements and be widened to a minimum 20' unobstructed width. In their response to the Peer Review, the applicant has agreed to widen a portion of this section of Tiffany Road from the site access road to Trafford Park Drive to 22' with vegetation cleared for safe passage. For the other portion from Trafford Park Drive to Old North Road, the applicant stated that

improvements are proposed “to the extent possible subject to surveying of this Area as to the impediments and size of the platted right-of-way, which is unknown.”

Furthermore, the “eastern” section of Tiffany Road, from Old North Road to New London Turnpike, should be improved with new asphalt and widened to the maximum width possible to better accommodate emergency vehicles and future traffic demands. The road width should be 22’ at minimum for this section, or at least as wide as possible given the limited width of the Tiffany Road right-of-way. The applicant should also clear roadside vegetation to improve sight lines. In the response to the Peer Review, the applicant declined to extend improvements and widen the eastern section of Tiffany Road, citing the lack of “sufficient width for any widening,” the drop in topography, wetlands implications, and site constraints posed by private improvements, telephone poles, and mailboxes. The applicant stated that “the estimated traffic utilizing the one-way road is nominal.”

At the November TRC meeting, Engineering, Police, Fire, and DPW concurred with the Peer Review Report and agreed that the improvement and widening of the full length of Tiffany Road will equip the roadway to handle additional traffic and allow safer passage of regular and emergency vehicles.

Sidewalks are proposed for Areas 2 and 3, but not Area 1. The applicant has requested an adjustment from the Subdivision Regulations for sidewalk construction. The lack of sidewalks in Area 1 creates safety concerns for future residents. Consistent with the Peer Review Report, members of the Technical Review Committee support the construction of sidewalks in Area 1. The Peer Review Report stated that the sidewalks would have several benefits for Area 1, making it safer for pedestrians, children, the elderly, and people with disabilities by providing a reliable and safe way to get to Tiogue Avenue.

Proposed Conditions – Stormwater, Open Space, Landscape Plan, and Cemetery Access

The applicant has presented a detailed stormwater management plan. Per this plan, stormwater flow will be diverted from the majority of land within Areas 2 and 3 into Complex Pond B in the southwestern section of the site. In the event of a 100-year storm overflow, the stormwater from Complex Pond B is designed to flow into the surrounding western wetlands and then downstream into Lake Tiogue as opposed to any neighboring residential properties. At the October TRC meeting, Engineering staff asked the applicant to explore options that can be incorporated into Underground Infiltration System (UIS) E to ensure that the downstream housing is protected from 100-year storm event exceedance. The applicant responded that their engineer will incorporate an overflow pipe from UIS E.

The project will also have an open space element, and the applicant has requested a waiver to submit a formal open space plan with their Final Plan, even though the checklist requires such an open space plan as part of this immediate Preliminary Plan Application. In the response to the October TRC review, the applicant indicated it is seeking the Planning Commission’s feedback on the site layout and design. According to the site plans, there appears to be 5.38 acres of the proposed development set aside as open space areas, noted on the Site Plan as, “Lots 201, 202, 203, and 204.” It should be noted that the October TRC Report misstated the total acreage of the open space areas as 10.36 acres.

In the response to the October TRC review, the applicant proposed defined open space buffers or conservation easements for 1.22 acres of land in Lot 201, which comprises the 58 units in Area 1, and the 0.82 acres of land in Lot 202, which comprises the 57 units in Area 2, to prevent future development into those areas. The applicant added that future development will also be prohibited on Lots 203 and

204, which will serve as a buffer to abutting homes on Trafford Park Drive and as drainage infiltration pond. Lot 203 will have 3.13 acres of open space, while Lot 204 will have 0.21 acres of open space. The applicant has suggested it will provide legal documents detailing open space and conservation restrictions with their Final Plan submission. Planning staff recommends that the applicant provide an open space plan (as a dedicated sheet in their plan set) that includes the exact boundaries and calculations for the areas of land that will be set aside as open space, as well as a description for the level of vegetative/natural resource protection intended for the open space areas.

The applicant has also indicated that it plans to submit a formal landscape plan, pending feedback from the Planning Commission on landscaping and street trees. The applicant has requested a waiver from the minimum spacing requirements for street trees. The applicant's response to the October TRC review did not provide any further details or clarification on their alternative plan for street trees, only stating that the proposed relief will "give the design flexibility to place street trees as part of a more cohesive design rather than a regimented design." Planning staff recommends that the applicant provide a detailed landscape plan at this immediate stage of review that describes their proposed alternative street tree layout.

Additionally, the applicant stated that the proposed limit of disturbance will not encroach into the 25' no-cut buffer for Historic Cemetery #CY076 and no excavation is proposed within this perimeter. In the TRC comments for the October meeting, Planning staff, in consultation with the Department of Public Works, requested that the applicant revise the plan set to include a 20' gravel access easement to facilitate access and periodic maintenance of the cemetery. In the response to the October TRC review, the applicant only agreed to provide visitors with walking access to the cemetery, over the existing sewer easement. Planning Staff recommends at minimum that a 5' gravel access path and easement be required to allow for future public access and maintenance.

Submission Waivers

The subject parcel is currently zoned R-20 (Residential). The applicant has provided Planning staff with a list of requested adjustments from the Town's Preliminary Plan Checklist, Building Regulations, Zoning Ordinance, and Land Development and Subdivision Regulations. These include:

1. Preliminary Plan Checklist:

- a. The applicant requested that submission of the following items be deferred until prior to the Preliminary Plan vote by the Planning Commission until "feedback from the board and staff on the proposed site plan configuration and confirmation that the roadways will be public or private":
 - #35. "Proposed location of proposed permanent bounds and corner markers if applicable."
 - #39. "Proposed improvements including streets, lots, lot lines, setback lines, and curb cuts, with lot areas and dimensions."
- b. The applicant asked for submission of the following item to be deferred until the Final Plan submission, with no rationale provided:

- #49. “Open Space Plan (residential cluster developments or residential compounds) including proposed location, dimension and area of any land proposed to be set aside as open space or dedicated to the town (or fees in lieu of land). This plan shall also contain a proposed maintenance element.”
- c. The application asked for a complete submission waiver from the following item, with no rationale provided:
 - #15. “Location of existing wooded areas, notation of existing ground cover, any trees over 50 years old.”

Commission Considerations: The applicant seeks the Planning Commission’s input on this matter. Planning staff seeks guidance from the Commission on the level of detail it would like to see as it related proposed improvements (item #39) and open space plan (item #49) at the Preliminary Plan stage of review. Planning Staff is of the view as this information is central to the ongoing review of the project.

Zoning – Yield Plan and Density Allowance

As a Comprehensive Permit, this project is eligible for a density bonus of an additional 5 units per acre above the baseline zoning allowance per RIGL § 45-53-4. The applicant has provided a yield plan that states the baseline zoning allowance for the subject property affords a total of 39 units. However, the applicant’s initial yield plan did not appear to meet the minimum zoning and subdivision requirements for road width. The applicant provided a revised yield plan for review on November 10, 2025, which indicated that the baseline 39 units is still achievable. Planning Staff finds this revised yield plan to be acceptable.

Per the density analysis in the project narrative, the total developable land eligible for a density bonus is 24.67 acres. With a state-enabled density bonus of 5 units per acre, the minimum allowable number of additional units is 123.35. Therefore, according to the applicant’s calculations, the minimum allowable number of units for the subject property is 162.35 units, as achieved through a combination of the baseline zoning allowance (39 units as presented by applicant) and the additional density bonus (123.35 units). Thus, the proposed 176 total units represents 13.65 more units than the applicant’s own calculation of the minimum density allowance combined with the state-enabled density bonus.

Zoning – Adjustment Requests

2. Building Regulations: The applicant requests the following adjustment:
 - a. To waive the Fair Share Development Fees for all affordable units, as designated by Chapter 106, Section 106-6 Fair Share Development Fees, for an amount of \$6,878 per unit.
3. Zoning Ordinance: The applicant requests the following adjustments:
 - a. To allow single-family attached units and residential condominiums, which are prohibited in the R-20 zone.

- b. To allow the minimum lot area for single-family lots to be 5,000 SF, where 20,000 SF is required in the R-20 zone.
 - c. To allow for relief from the (1) minimum frontage, (2) minimum front, side, and rear setbacks, and (3) maximum lot coverage requirements in the R-20 zone. The proposed lots will have 50' of frontage, 20' front setbacks, 5' side setbacks, 20' rear setbacks, and 50% lot coverage.
4. Subdivision and Land Development Regulations: The applicant requested the following adjustments:
- a. To allow the right-of-way width to be 50' where 60' is required.
 - b. To allow the pavement width to be 26' total where 30' is required.
 - c. To allow bituminous berm in lieu of concrete curb.
 - d. To allow sidewalks to be proposed on one side of the roadway for Areas 2 and 3 and no sidewalks in Area 1.
 - e. To allow cul-de-sacs, which are prohibited.
 - f. To allow street trees to be planted according to a detailed landscape plan (pending submission), as opposed to minimum spacing limits.
 - g. To allow monuments (granite bound markers) to be provided as per the record plan, no less than one monument every 500' along proposed rights-of-way at points of curvature or intersection of proposed property lines.
 - h. To allow monumentation (iron rods or drill holes in existing stone walls) to be provided as per the record plan, at every angle point on the exterior boundary of the subdivision.
 - i. To allow for bituminous berms in lieu of curbing at intersection fillet curves.

Commission Considerations: In addition to the requested waiver from Fair Share Development Fees, the applicant requested adjustments to sewer assessments if the internal roadways are privately owned and maintained. Planning staff is of the view that the Planning Commission is not the appropriate entity to grant waivers from Fair Share Development Fees or sewer assessments, which are under the authority of the Town Council.

Interdepartmental Review and Comments

Please see the attached reports from the Technical Review Committee (dated October 14, 2025 and November 10, 2025) for interdepartmental comments on this application. This proposal was reviewed by the TRC twice, with the first meeting focused on the site plans and application as a whole and the second meeting dedicated primarily to roadway design and traffic issues.

Public Comments

Planning staff received multiple public comments from abutters and residents, which discussed issues related to traffic circulation, roadway design, stormwater management, public safety, emergency vehicle access, density allowance and zoning relief, environmental considerations, open space and conservation, as well as public services and infrastructure.

II. COMPREHENSIVE PERMIT

Findings of Fact

Staff has conducted an orderly, thorough, and expeditious technical review of this Comprehensive Permit Application for conformance with required standards set forth in RIGL § 45-53-4, as well as in the Town of Coventry's Subdivision and Land Development Regulations, and finds as follows:

RIGL § 45-53-4. Whether the proposed development is consistent with local needs as identified in the community's affordable housing plan and/or has satisfactorily addressed the issues where there may be inconsistencies. If the local board finds that the proposed development is inconsistent with the community's affordable housing plan, it must also find that the municipality has made significant progress in implementing its housing plan.

1. The applicant has not presented staff with findings or evidence to demonstrate that the proposed development is consistent with local needs as identified in the Town of Coventry Affordable Housing Production Plan of June 2005 or satisfactorily addressed the issues where there may be inconsistencies.

RIGL § 45-53-4. Whether the proposed development is in compliance with the standards and provisions of the municipality's zoning ordinance and subdivision regulations, and/or where adjustments are requested by the applicant, that whether local concerns that have been affected by the relief granted do not outweigh the state and local need for low- and moderate-income housing.

2. Planning staff is of the view that the Planning Commission lacks the authority or rationale to grant the waivers from the Town Council-designated Fair Share Development Fees or sewer assessments.
3. The applicant has not provided sufficient clarity or rationale for their request for submission waivers from the Preliminary Plan checklist items #15, #35, #39, and #49.
4. The applicant has not provided sufficient clarity or rationale for their request for a waiver from the Subdivision Regulations to allow sidewalks to be proposed on one side of the roadway for Areas 2 and 3 and no sidewalks in Area 1.
5. The applicant has not provided evidence to demonstrate that the local concerns that have been affected by the aforementioned relief does not outweigh the state and local need for low- and moderate-income housing.

RIGL § 45-53-4. Whether the low- and moderate-income housing units proposed are integrated throughout the development; are compatible in scale, meaning that: (1) The size of the low- and moderate-income units shall not be less than seventy-five percent (75%) of the size of the market rate units, unless otherwise allowed by the local board; (2) The affordable units are of similar architectural style to the market rate units within the project so that the exterior of the units look like an integrated neighborhood with similar rooflines, window patterns, materials and colors; and (3) The affordable units will be built and occupied in a proportional manner with the construction and occupancy of the market rate units. Except that for housing units that are intended to be occupied by persons fifty-five (55) years of age or older, or sixty-two (62) years of age or older, as permitted by the federal Fair Housing Act pursuant to 42 U.S.C.A. § 3607(b) and 24 CFR § 100.300-308 and the Rhode Island fair housing practices act pursuant to § 34-37-4.1, such units need not be integrated in any building or phase within the development that contains housing units that are not age-restricted, and neither age-restricted housing units nor any building or phase containing age-restricted housing units must be compatible in scale and architectural style to other housing unit types to the extent the age-restricted housing units are designed to meet the physical or social needs of older persons or necessary to provide housing opportunities for older persons.

6. The applicant has not provided sufficient information to demonstrate that the low- and moderate-income housing units will be built and occupied in a proportional manner with the construction and occupancy of the market-rate units.

RIGL § 45-53-4. Whether there will be 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.

7. The proposed development is expected to create adverse impacts on the safety of existing and future residents, particularly concerning the safe circulation of pedestrian and vehicular traffic and the adequate provision of emergency services.
8. The absence of a through-road connection between Areas 2 and Area 3 will lengthen travel distances for emergency vehicles and consequently increase response times, thus diminishing public safety. It is within the power of this applicant to address this safety issue by providing a revised site plan to add a through-road, but such a plan has not been received to date.
9. The existing right-of-way along Tiffany Road requires improvement and widening to safely and efficiently accommodate regular and emergency traffic. The applicant proposes to improve and widen a section of Tiffany Road. However, the applicant has not agreed to undertake corresponding improvements along the additional sections of Tiffany Road between Old North Road and New London Turnpike, which is narrow and in substandard condition. The failure to improve this segment would pose safety hazards for inbound motorists and emergency responders. It is within the power of this applicant to address this safety issue by providing a revised site plan to address these off-site improvements, but such a plan has not been received

to date.

10. The absence of sidewalks in Area 1 will adversely affect pedestrian safety and accessibility as it will limit safe, independent travel for children, the elderly, and individuals with disabilities. It is within the power of this applicant to address this safety issue by providing a revised site plan to add sidewalks, but such a plan has not been received to date.
11. This negative finding regarding the safety of existing and future residents relies upon the corresponding analysis and content contained within the body this Staff Report dated 11/13/25, the Peer Review Report dated 10/31/25, and the TRC Reports dated 10/14/25 and 11/10/25.

RIGL § 45-53-4. Whether the proposed land developments or subdivisions lots will have adequate and permanent physical access to a public street in accordance with the requirements of § 45-23-60(a)(5), or the local review board has approved other access, such as a private road.

12. The proposed land development will have adequate and permanent access to Tiogue Avenue, East Shore Drive, and Minglewood Drive.
13. The development will also have access to Tiffany Road, but Planning staff regards this access as inadequate due to Tiffany Road's narrow width and the applicant's declination to widen.

RIGL § 45-53-4. Whether the proposed development will 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.

14. Planning staff does not have concerns that the proposed development will result in the creation of individual lots with any physical constraints that would make building on those lots according to pertinent regulations and building standards impracticable.

Recommendation

Staff finds this proposal is not consistent with the standards for required findings of fact set forth in RIGL § 45-53-4, as well as in the Town of Coventry's Subdivision and Land Development Regulations. Staff therefore recommends that the Planning Commission **deny** the Comprehensive Permit Application.

Outstanding Issues

The following outstanding issues require the Planning Commission's review and input at the upcoming meeting:

- Site Plan Changes – the applicant has suggested they may be willing to make site plan changes to address concerns that have arisen through the Town's review process to date, but no revised site plans have been received as of the writing of this Staff Report.

- Public vs. Private Roadways – the applicant has indicated it is seeking input on whether the new roadways built through this project should be public or private. Members of the Technical Review Committee have indicated that private roadways are preferred.
- Density Bonus – the applicant has proposed 13.65 more units than the minimum allowable density per the yield plan and state law.
- Bedroom Count – the applicant has stated that the multi-family units are proposed to be 2-3 bedrooms each, and the single family lots are proposed to be 3-4 bedrooms each. The Commission should seek clarification on the applicant intends regarding the bedroom mix for these units.
- Open Space Plan – the applicant has not submitted a dedicated plan for the designated open space areas and conservation easements, although such a plan is required at this stage.
- Landscape Plan – the applicant has not submitted a detailed landscape plan that describes their alternative spacing methods for street trees, although the applicant has suggested it will provide such a plan at this stage.
- Submission Waivers – the applicant has requested several waivers from checklist items, as delineated above. The Commission should specifically consider its feedback to the applicant on each of the requested Submission Waivers and whether it wishes to provide such waivers at this time.
- Waivers of Town Council Authorized Fees – the applicant has requested waivers of fees that Planning Staff do not believe this board has the authority to waive. The Commission should be mindful of this issue, request clarification from the applicant, and receive additional input from Planning Staff or Solicitor before considering any decision on the same.
- Conservation Commission – the Chair of the Conservation Commission has requested to review this proposal to provide the Planning Commissions with an advisory opinion on this specific project.
- Construction of LMI Units – the applicant has not provided sufficient information as to whether the affordable units will be constructed or occupied in a proportional manner to the market-rate units.



TOWN OF COVENTRY
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TECHNICAL REVIEW COMMITTEE REPORT

DATE: October 14, 2025
PROJECT NAME: "Village at Tiogue"
PROPERTIES: AP 32, Lots 149, 150, 151, & 153
ADDRESS: Tiogue Avenue, East Shore Drive, Minglewood Drive, & Tiffany Road
ZONE: R-20 (Residential)
OWNER/APPLICANT: 232 Realty Associates

This matter came before the Coventry Technical Review Committee at its October 14, 2025 meeting as a Preliminary Plan for a Major Land Development as a state-enabled Comprehensive Permit Application in accordance with Article V, D.4. of the Coventry Subdivision & Land Development Regulations and RIGL § 45-53-4.

An application and plan set with supplementary traffic and stormwater documents were submitted for review on September 15, 2025. The applicant proposes to develop 176 units comprised of a mix of single-family units and multi-family units on approximately 27 acres of land as a Comprehensive Permit. A minimum of 25% of the proposed units must be deed-restricted as affordable. Site access is proposed from Tiogue Avenue, Tiffany Road, East Shore Drive, and Minglewood Drive. Public water and sewer access to the development is anticipated.

The members of the Technical Review Committee reviewed the following documents, which were made available at the dedicated Village at Tiogue webpage related to this application, when preparing the comments below. The TRC also reviewed public comments provided prior to the meeting.

Village at Tiogue - KCWA Water Availability Letter.pdf
Village at Tiogue - Preliminary Plan Set.pdf
Village at Tiogue - Project Narrative.pdf
Village at Tiogue - Soil Erosion and Sediment Control Plan.pdf
Village at Tiogue - Traffic Impact Study.pdf
Village at Tiogue - Stormwater Management Report.pdf
Village at Tiogue - Stormwater System Operation & Maintenance.pdf

PRINCIPAL PLANNER DESIGNEE

1. Planning Staff notes that the development is being proposed as a state-enabled Comprehensive Permit Application with access to public water and sewer, which makes it eligible for a density bonus of an additional 5 units per acre above the baseline zoning allowance per RIGL § 45-53-4. The applicant has provided a yield plan that states the baseline zoning allowance for the subject property affords a total of 39 units.

2. The applicant's yield plan does not appear to meet the minimum zoning and subdivision requirements for the subject property and should be revisited by the applicant in a timely manner to verify the correct number of units per the baseline zoning allowance.
3. Per the density analysis in the project narrative, the total developable land eligible for a density bonus is 24.67 acres. With a state-enabled density bonus of 5 units per acre, the minimum allowable number of additional units is 123.35. Therefore, according to the applicant's calculations, the minimum allowable number of units for the subject property is 162.35 units, as achieved through a combination of the baseline zoning allowance (39 units as currently presented by applicant – which requires further verification) and the additional density bonus (123.35 units).
4. The applicant has proposed to develop 176 total units, representing 13.65 more units than the applicant's own calculation per the minimum density allowance, as well as the minimum density bonus per RIGL § 45-53-4.
5. Per state law, 25% of the proposed units must be deed-restricted as Low- and Moderate-Income (LMI) units. The applicant has designated 44 units (exactly 25%) as affordable. Planning staff requests that the applicant provide the proposed locations of the LMI units in a timely manner.
6. The applicant has indicated it is offering optionality on the proposed ownership of the internal access roadways as either privately or publicly owned. In earlier correspondence between Planning Staff and the applicant, the Town indicated that ALL proposed internal roadways should be privately owned and maintained. Staff seeks confirmation from the applicant on this point, and requests the applicant make all related revisions to its application to confirm their approach in a timely manner.
7. Planning Staff has safety concerns with the limited access to the townhome units in Area 3 and requests the timely consideration of an internal through-road to connect Areas 2 and 3. Additional details on this issue, and all other transportation design and traffic circulation issues, will be subject to further study by the Town's third-party traffic peer reviewer prior to additional review of the same by the TRC.
8. Planning Staff requests clarity as to the extent of the off-site roadway improvements that are currently being proposed by the applicant. The traffic impact study submitted by Crossman Engineering recommended that Tiffany Road be widened to a minimum of 22' from the proposed site access road to Area 3 to Old North Road. This information is inconsistent with the site plans submitted by DiPrete Engineering, which depict the proposed roadway improvements terminating at the entrance to Trafford Park Drive. Planning Staff requests the applicant provide clarity on this point in a timely manner.
9. Planning Staff request the applicant consider including additional sidewalks for safety purposes in a timely manner. This issue will be subject to further study by the Town's third-party traffic peer reviewer prior to additional review of the same by the TRC.
10. Crossman also recommended the minor trimming of existing roadside vegetation along Tiffany Road as part of the road widening and the installation of any proposed entrance landscaping elements to maintain driver sight lines. Planning Staff seeks additional details about the tree planting plan for this proposal, including specific approach to proposed roadside treatments and plantings. The applicant's narrative refers to a "detailed landscape plan" as a submission document showing the tree plantings, but no such document was submitted. It is also noted that the applicant seeks a waiver from the minimum spacing for street trees. Planning Staff requests the applicant provide such details and plans in a timely manner.
11. The applicant has requested four submission waivers from the Preliminary Plan checklist, listed below. Planning Staff requests clarity on the applicant's rationale and approach to the submission waivers below, and requests that such information be provided in a timely manner.

- a. #15. "Location of existing wooded areas, notation of existing ground cover, any trees over 50 years old."
 - b. #35. "Proposed location of proposed permanent bounds and corner markers if applicable."
 - c. #39. "Proposed improvements including streets, lots, lot lines, setback lines, and curb cuts, with lot areas and dimensions."
 - d. #49. "Open Space Plan (residential cluster developments or residential compounds) including proposed location, dimension and area of any land proposed to be set aside as open space or dedicated to the town (or fees in lieu of land). This plan shall also contain a proposed maintenance element."
12. The applicant has set aside 10.36 acres of the proposed development as open space, noted as Lots 202, 203, and 204 on the site plans. Planning Staff seeks further clarification in a timely manner on the applicant's approach to the proposed open space and any related restrictions on its future use.
 13. The applicant is seeking a waiver for the affordable units from the Fair Share Development Fees designated by Chapter 106, Section 106-6 Fair Share Development Fees, for an amount of \$6,878 per unit. It is unclear whether the Planning Commission is the proper entity to consider waivers from this Town-wide fee structure.
 14. Planning Staff seeks confirmation from the applicant in a timely manner that the proposed limit of disturbance for Area 1 will not encroach into the required 25' no-cut buffer for Historic Cemetery #CY076.
 15. Planning Staff request the applicant revise the plan set to include a 20' wide gravel access easement to facilitate access and periodic maintenance of the historic cemetery.

TOWN ENGINEER

Plans

- 1) Sheet 3 of 24/General Notes and Legend/Grading, Drainage and Utility Notes: - Update note to reflect construction start and completion dates.
- 2) Sheet 16 of 24/Road E Plan and Profile – Any OWTS components that are excavated and removed off-site for the existing house must be properly disposed of at a licensed solid waste landfill.
- 3) Sheet 17 of 24/Pond Complexes A & D – There are numerous notes that state that site contractor coordination is required with a licensed soil evaluator or a RI Registered Professional Engineer and visual soil inspections are required by a licensed soil evaluator or a RI Registered Professional Engineer. Another note states the need for direction from a site engineer or geotechnical engineer. Additional information is requested to clarify the contracting specifics of all these professionals and their reporting requirements.

Stormwater Management Report

- 1) 2.3 Post Site Conditions (Underground Infiltration System E & F) – The design of UIS F incorporates an overflow that drains to WQ Infiltration Pond D. Due to grade issues, UIS E does not have an overflow pipe. Please explore options that can be incorporated into UIS E to ensure that the downstream housing is protected from 100-year storm event exceedance.

Traffic Impact Study

- 1) Engineering takes exception to the proposed roadway connectivity design of Area 3 with the existing and proposed abutting roadways. The proposed improvements to Tiffany Road are insufficient and do not provide an adequate level of public safety. Further design considerations are requested.
- 2) Connectivity improvements shall be provided between proposed Road A and Road B to ensure two points of access to Area 3 of the project.
- 3) These comments are pending the conclusions of the Peer Evaluation of the Traffic Impact Study.

PUBLIC WORKS DIRECTOR

- The comments from this office needs to be separated for both portions of this application. The portion of the project that includes the condominiums which exit onto Tiogue Avenue is not opposed as long as the project infrastructure remains private. The portion of the project which includes the single family homes which will exit onto Tiffany Road is a safety concern.
- The peer review of the traffic study is needed. DPW is always concerned with the health, safety, and welfare of Coventry residents.

FIRE REPRESENTATIVE

- I have a safety concern with how section 3 is designed.
- I feel that sections 2 and 3 should be connected.
- Subject to review by pier reviewer.

POLICE CHIEF

- The police department has safety concerns with the lack of access to area 3. We recommend interconnecting with a through road between area 2 and 3. This issue should be reviewed by a traffic study (peer reviewed) prior to further approvals.

PLANNING COMMISSION CHAIR

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



TOWN OF COVENTRY
Department of Planning & Development
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TECHNICAL REVIEW COMMITTEE REPORT

DATE: November 10, 2025
PROJECT NAME: "Village at Tiogue"
PROPERTIES: AP 32, Lots 149, 150, 151, & 153
ADDRESS: Tiogue Avenue, East Shore Drive, Minglewood Drive, & Tiffany Road
ZONE: R-20 (Residential)
OWNER/APPLICANT: 232 Realty Associates

This matter came before the Coventry Technical Review Committee at its November 10, 2025 meeting as a Preliminary Plan for a Major Land Development as a state-enabled Comprehensive Permit Application in accordance with Article V, D.4. of the Coventry Subdivision & Land Development Regulations and RIGL § 45-53-4.

An application and plan set with supplementary traffic and stormwater documents were submitted for review on September 15, 2025. The applicant proposes to develop 176 units comprised of a mix of single-family units and multi-family units on approximately 27 acres of land as a Comprehensive Permit. A minimum of 25% of the proposed units must be deed-restricted as affordable. Site access is proposed from Tiogue Avenue, Tiffany Road, East Shore Drive, and Minglewood Drive. Public water and sewer access to the development is anticipated.

The members of the Technical Review Committee reviewed the following documents, which were made available at the dedicated Village at Tiogue webpage related to this application, when preparing the comments below. The TRC also reviewed public comments provided prior to the meeting.

Village at Tiogue - KCWA Water Availability Letter.pdf
Village at Tiogue - Preliminary Plan Set.pdf
Village at Tiogue - Project Narrative.pdf
Village at Tiogue - Soil Erosion and Sediment Control Plan.pdf
Village at Tiogue - Traffic Impact Study.pdf
Village at Tiogue - Stormwater Management Report.pdf
Village at Tiogue - Stormwater System Operation & Maintenance.pdf
Village at Tiogue - October TRC Report.pdf
Village at Tiogue - Traffic Study Peer Review.pdf
Village at Tiogue - Applicant Response to Traffic Study Peer Review.pdf

PRINCIPAL PLANNER DESIGNEE

1. All previous comments from the TRC meeting on October 14th still stand.
2. Since the last meeting, the PARE Corporation has provided a Peer Review Report dated 10/31/25 based upon the applicant's Traffic Impact Study and Plan Set. Planning Staff concur with the peer reviewer's recommendations contained therein.

3. Consistent with the Peer Review Report, Planning Staff recommends that the applicant make off-site improvements to the full length of Tiffany Road, from New London Turnpike to the site access road for Area 3 of the proposed development:
 - a) The westbound section of Tiffany Road, from the intersection with Old North Road to the proposed site access road, should have pavement improvements and be widened to a minimum 20' unobstructed width.
 - b) The eastbound section of Tiffany Road, from New London Turnpike to Old North Road, should be improved with new asphalt and widened to the maximum width possible to better accommodate future traffic demands. The road width should be 22' at minimum for this section, or at least as wide as possible given the limited width of the Tiffany Road right-of-way.
 - c) The applicant should also clear roadside vegetation to improve sight lines.
 - d) Staff suggests that the applicant make such changes to their Plan Set in a timely manner. The improvement and widening of Tiffany Road will equip the roadway to handle additional traffic and allow safer passage of regular and emergency vehicles.
4. Consistent with the Peer Review Report, Planning Staff recommends that the applicant construct a through-road between Areas 2 and 3, and revise their Plan Set accordingly. The lack of a through-road connection creates safety and access concerns for emergency responders. The peer review states that the through-road connection will reduce the length of travel for everyday motorists going to New London Turnpike or Tiogue Avenue. Staff suggests that the applicant make any such changes in a timely manner.
5. Consistent with the Peer Review Report, Planning Staff supports the construction of sidewalks in Area 1. Sidewalks are proposed for Areas 2 and 3, but not Area 1. The Peer Review Report opined that the sidewalks will have several benefits for Area 1, making it safer for pedestrians, children, the elderly, and people with disabilities by providing a reliable way to travel without assistance. Staff suggests the applicant make any such changes to their Plan Set in a timely manner.
6. The applicant provided a response to the Peer Review Report dated 11/5/25, but has not submitted a revised Plan Set and Traffic Impact Study at this time. This TRC review is based upon the Plan Set and Traffic Impact Study as they stand today.

Question for Applicant:

7. Has the applicant identified a monitoring agent for the LMI units? Planning staff ask that the applicant provide a letter of commitment from the monitoring agent.

TOWN ENGINEER

- Engineering has performed a review of the subject project's stormwater management report dated 9/15/25. The technical aspects presented in the report demonstrate that the proposed project shall have no net increase in stormwater runoff from pre-development to post-development conditions and the proposed BMPs shall provide water quality treatment for stormwater runoff. The proposed drainage design meets the standards of the Rhode Island Stormwater Design and Installation Standards Manual (RISDISM) and ultimately will require final review and approval by RIDEM. Engineering does not recommend that further evaluation is necessary in the form of a peer review.

- Applicant shall follow the Town of Coventry Inspection Procedures Document dated 11/10/25
- Engineering suggests that COCs be submitted in groups for Areas 1, 2, & 3 as follows:
 - Area 1 (2 Groups):
 - Group 1: Units 119–147
 - Group 2: Units 148–176
 - Area 2 (3 Groups):
 - Group 1: Units 62-81
 - Group 2: Units 82-102
 - Group 3: Units 103-118
 - Area 3 (3 Groups):
 - Group 1: Lots 1-13 and Lots 22-28
 - Group 2: Lots 14-21, Lots 29-31, Lot 39 and Lots 53-61
 - Group 3: Lots 32-38 and Lots 40-52
- All traffic related comments from the October 14, 2025 TRC meeting still stand. Engineering recommends Improvements to Tiffany Road and the connection of the development's interior roadway Area 3 and Area 2 as outlined in the Pare Engineering Peer Report dated October 31, 2025.

PUBLIC WORKS DIRECTOR

- DPW concurs with the recommendations from peer reviewer as safety and emergency response are critical issues that must be addressed.
- DPW recommends that pedestrian safety and new sidewalks be addressed on newly connected roadways and in the surrounding neighborhoods as needed. The issue of pedestrian safety must be ensured by applicant while they make revisions to plans.

FIRE REPRESENTATIVE

The fire department has considered the peer review traffic study, and we concur with all of the recommendations identified within the report, particularly the following the safety suggestions:

1. Installation of a connection road between Area's 2 and 3. Lack of a connecting road could create significant safety and access concerns for emergency response.
2. We concur with the report regarding Tiffany Rd. That roadway should be widened and improved to handle emergency vehicles.

POLICE CHIEF

- We have considered the peer review traffic study and we concur with all of the recommendations identified within the report, particularly the following the safety suggestions:
- Installation of a connection road between Areas 2 and 3. Lack of a connecting road could create significant safety and access concerns for emergency responders.

- Sidewalk installation in Area 1. As cited in the report, sidewalks in this location will make it safer for pedestrians, children, the elderly, and people with disabilities by providing a reliable way to travel without assistance.
- We concur with the report regarding Tiffany Rd. That roadway should be widened and improved to handle additional traffic and allow for safer passage of regular and emergency vehicles.

PLANNING COMMISSION CHAIR

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