

**Town of Coventry, Rhode Island
Planning Board and Town Council**

**Multi-Unit Mixed-Residential and Commercial Development Proposal
'Coventry Centre Planned District'**

**Zone Change and
Major Land Development Project**

**2271 New London Turnpike and 666 Arnold Road, Coventry, RI
Assessor's Plat 7 - Lot(s) 23 and 24**



Prepared for: Starr Capital, LLC

By: Pimentel Consulting, Inc.

2 July 2025

INTRODUCTORY STATEMENT

Starr Capital, LLC ("Applicant") has retained the professional land use planning and zoning consulting services of Pimentel Consulting, Inc. ("Consultant"), for the express purpose of determining the appropriateness of a proposed zone change necessary to ensure successful development of well under-utilized property. The zone change is absolutely required to realize regulatory flexibility, permitting the variety and intensity of requisite land uses (both commercial and residential), envisioned by the Comprehensive Plan, as will be detailed throughout this report. As permitted by law in order to realize a successful mixed-use development, a Planned District is proposed to address the unique characteristics of the property and surrounding similarly developed land uses. Most pertinent is realizing 'consistency' with the regulatory direction afforded by the Comprehensive Plan, in addition to the Future Land Use Map 'FLUM', as necessitated by Rhode Island General law ("RIGL").

The proposed development activity is defined as a Major Land Development Project ("Major LDP"), necessitating conditional Master Plan approval and advisory recommendation prior to proceeding onto the Town Council for approval of the zone change to a Planned District. The referenced change will realize a more appropriate uniquely crafted zoning designation, as envisioned by the Comprehensive Plan, thereby permitting greater flexibility in land usage. In light of the referenced development proposal, this Consultant has thoroughly reviewed the applicant's submission package, as well as the following regulatory documents:

- o Town of Coventry, Rhode Island, Comprehensive Community Plan - As Amended through June 2000 ("Comprehensive Plan");
- o Town of Coventry, Rhode Island, Zoning Ordinance ("Ordinance");
- o Town of Coventry, Rhode Island, Subdivision and Land Development Regulations ("Development Regulations"); and
- o Review of pertinent Rhode Island General Law ("RIGL") and case law.

The following analysis entails rendering a determination as to the appropriateness of creating a specialized zoning designation for the subject parcels, otherwise entitled the 'Coventry Centre Planned District', in light of respective goals and objectives of the Comprehensive Plan, specifically the Land Use and Economic Development Elements. In addition, special provisions to realize greater flexibility and intensity of land usage (e.g., shared off-street parking standards) are being pursued to ensure mixed-use development success. Finally, this report will evidence to the satisfaction of the Planning Board the requisite standards for the granting of the Major LDP.

Goal 1: "Guide the rate, location, and character of development by taking into account the natural characteristics of the land (including suitability for use), protection of natural, historic, cultural and scenic character, and the capacity of existing and planned public and private services and facilities." [Page C.1-1]

Objective 1.1: "Revise Zoning and Subdivision regulations to reflect the goals that were formulated during the Comprehensive planning process."

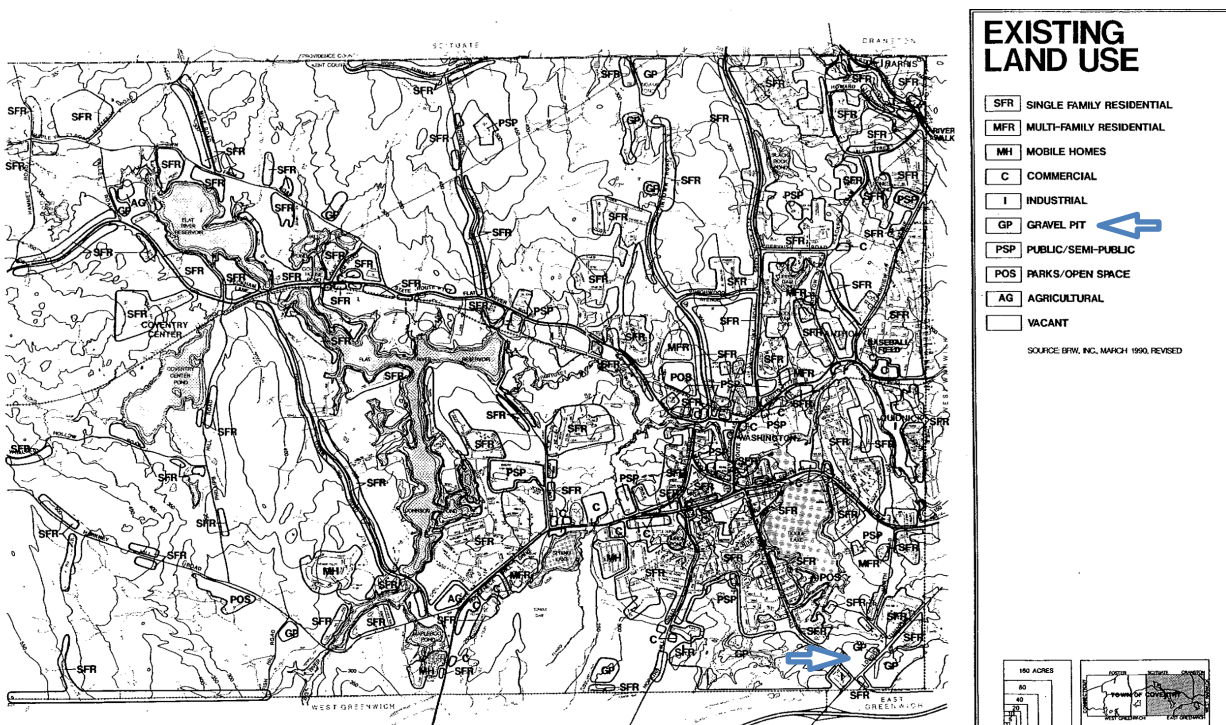
Goal 2: "Encourage commercial, industrial, and office development in specific areas of coventry." [Page C.1-2]

Objective 2.1: "Expand existing commercial, industrial and business park districts in appropriate areas."

GENERAL PROPERTY DESCRIPTION

The property that is the focus of the proposed zone change is a combination of two (2) parcels, both of which are presently unimproved, having historically been located in an area utilized for industrial graveling purposes, as illustrated below.

Map B.3-1A 'Existing Land Use' - Illustrates that the subject property and immediate area was historically used for Gravel Pit purposes.



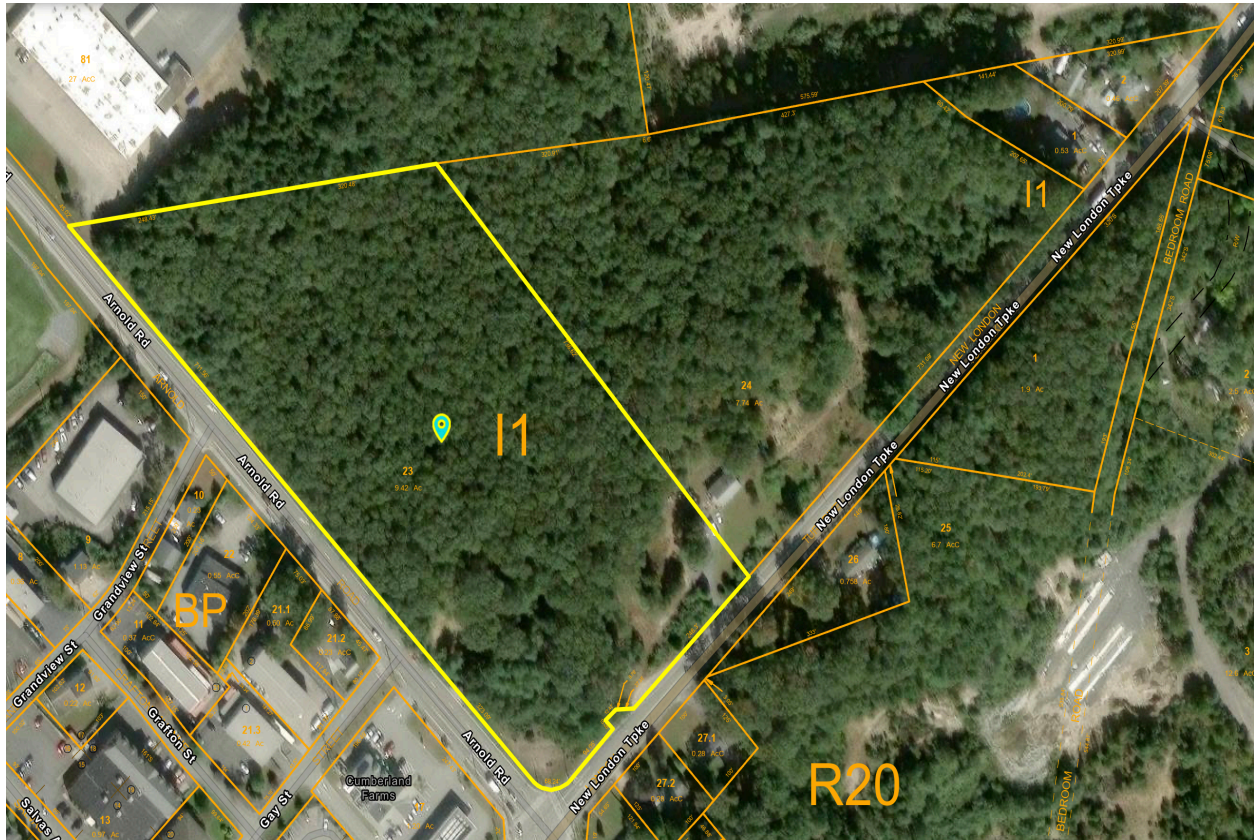
The parcels are individually described as follows:

1. Assessor's Plat 7, Lot 23, addressed 666 Arnold Road, and containing approximately 8.56-acres of total land area. Lot 23 does not appear to have any constraints to development, the entire parcel being comprised of suitably developable land resources. Lot 23 is defined as a corner lot, having physical frontage along both Arnold Road and New London Turnpike. Lot 23 has in excess of 1,000 linear feet of lot frontage along Arnold Road, and approximately 425 linear feet of lot frontage along New London Turnpike. Lot 23 abuts improved industrial land resources to the north and intensive commercial land resources to the west and immediate south. The sole presence of sparse residences is situated across New London Turnpike to southeast.
2. Assessor's Plat 7, Lot 24, addressed 2271 New London Turnpike, and containing approximately 8.49-acres of total land area. Likewise, Lot 24 does not appear to have any constraints to development, the entire parcel being comprised of suitably developable land resources. Lot 24 has in excess of 730 linear feet of lot frontage along New London Turnpike. Lot 24 abuts disturbed industrial land resources to the north, having previously been used for graveling purposes. There is only a smattering of residences to the immediate east and south, across New London Turnpike.

The referenced parcels, which will be merged by means of an Administrative Subdivision if successful, will have an approximate total lot area of 17.05-acres, all of which appears to be deemed upland resources ("Property"). In addition, the Property will have upwards of 1,000 linear feet of lot frontage along Arnold Road, and in excess of 1,150 linear feet of lot frontage along New London Turnpike. Both Arnold Road and New London Turnpike are classified Urban - Arterial roadways, designed to accommodate greater commercially-oriented vehicular volume and movement.

a. Typical Roadway Classification Cross-Sections - *"In Coventry, the roadway functional classifications are further characterized as "urban" or "rural", generally defining the adjacent land use density served. In central and western Coventry (generally west of Johnson's Pond), the major streets are classified as either Rural Arterials or Rural Collectors serving the adjacent very low density residential and agricultural uses, and in eastern Coventry the major streets are classified as either Urban Arterials or Urban Collectors serving residential neighborhoods, commercial areas and employment centers."* [Page D.2-10]

Having such extensive and multiple lot frontages affords greater latitude in development of the Property, to include the positioning of commercial and residential facilities by allowing to the extent feasible the fronting of improvements, thereby visually minimizing necessary, albeit less appealing, accessory amenities such as off-street parking. It also permits greater latitude in the positioning of points of ingress and egress, assuring appropriate access for employees and customers, residents and guests, and emergency vehicles, alike. The Property is illustrated on the following page, as excerpted from the Town's GIS.



The Property is located in the southeastern most corner of the community, almost directly abutting the Towns of East Greenwich and West Greenwich. Furthermore, and more importantly, it is situated within proximate distance of the Centre of New England Business Park (“CNE Business Park”). The referenced uniquely crafted vast mixed-use commercial and residential development, located directly off of Interstate 95, is situated at the Exit 21 Interchange. The presence of the CNE Business Park and associated infrastructure has spurred on similar highway commercial and high-density residential development throughout the immediate area, and appropriately so. This has been a most positive by-product, because of limited town-wide infrastructure and constraint-free land resources. The general locale is but one of a handful of areas town-wide designed in such a heavily commercialized tax-generating manner, and yet similarly approved with high-density residential, evidencing the appropriateness of mixed-use development. The area is conducive to realizing dense complimentary residential and commercial entities, thereby serving the diverse needs of the community, . This is in direct accord with the Comprehensive Plan.

"The intent of the Visions, Goals and Objectives is to."

- **"Encourage economic growth to balance the tax burden and create job opportunities for Coventry residents and the region, without degrading the natural and man-made environment."**

C.3 Economic Development - Vision: *"Our vision for economic development concentrates on providing opportunities for high quality, job-based development and revitalization of existing commercial districts in specific areas of Coventry in order to diversify the tax base and to provide employment opportunities for Coventry residents. New businesses should be located with consideration of available infrastructure, sensitivity to environmental areas, transportation access and compatible adjacent land uses..." [Page C.3-1]*

Goal 1: *"Promote and encourage high quality, low polluting commercial, industrial, and office development." [Page C.3-1]*

Objective 1.2: *"Expand existing commercial, industrial and business park zone districts in order to minimize the disparity that exists between residential and business land use in Coventry."*

c. Lack of Infrastructure - *"A significant factor limiting economic development in the Town of Coventry is the availability of sanitary sewer facilities. Sewer facilities are available only on a limited basis in eastern Coventry, and include a 15" gravity line in the New London Turnpike serving the West Warwick Industrial Park and the West Greenwich Technology Park...In addition to sewer lines, roadway capacity will be an important criteria for stimulating economic development in Coventry. The proposed business park site along the Town's southern boundary is served well by the recently upgraded Hopkins Hill Road (4 lanes), but will require capacity improvements to the New London Turnpike and Arnold Road to serve any significant development on site..." [Pages D.3-5 - D.3-6]*

The Town of Coventry is overwhelming zoned in a low-density residential manner, relying on limited commercially and industrially zoned land resources to off-set the tax burdens imposed on the citizenry; an obvious tenuous and unsustainable situation. The same is true in regard to higher-density residential development, which is much-needed to meet the diverse housing needs of the community's citizenry, in particular seniors looking to down-size and younger individuals who are incapable of finding housing, and yet likewise reliant on the presence of all requisite infrastructure. The community has therefore dissected the community into three (3) distinct geographic areas, with each segmented area reflecting historical development patterns based upon presence of requisite infrastructure (public sewer, water, and roadway system) and limited environmental and site sensitive (e.g. archaeological) features. The Property is physically located within the eastern most portion of the community, the area deemed most appropriate for more intensive land usage, to include mixture of commercial and high-density residential, given presence of all requisite infrastructure.

A. The Plan seeks to maintain Coventry's Diversity - *"The Land Use Plan recognizes that Coventry is composed of three geographic areas - eastern, central, and western Coventry -*

whose diverse nature is a defined characteristic of Coventry. Each area contains important resources that contribute significantly to Coventry as a whole.” [Page D.1-11]

1. Eastern Coventry: *“In addition to being the primary location for residential neighborhoods...Likewise, most of the town’s commercial businesses are situated in this part of the Town along the two major arteries...”*

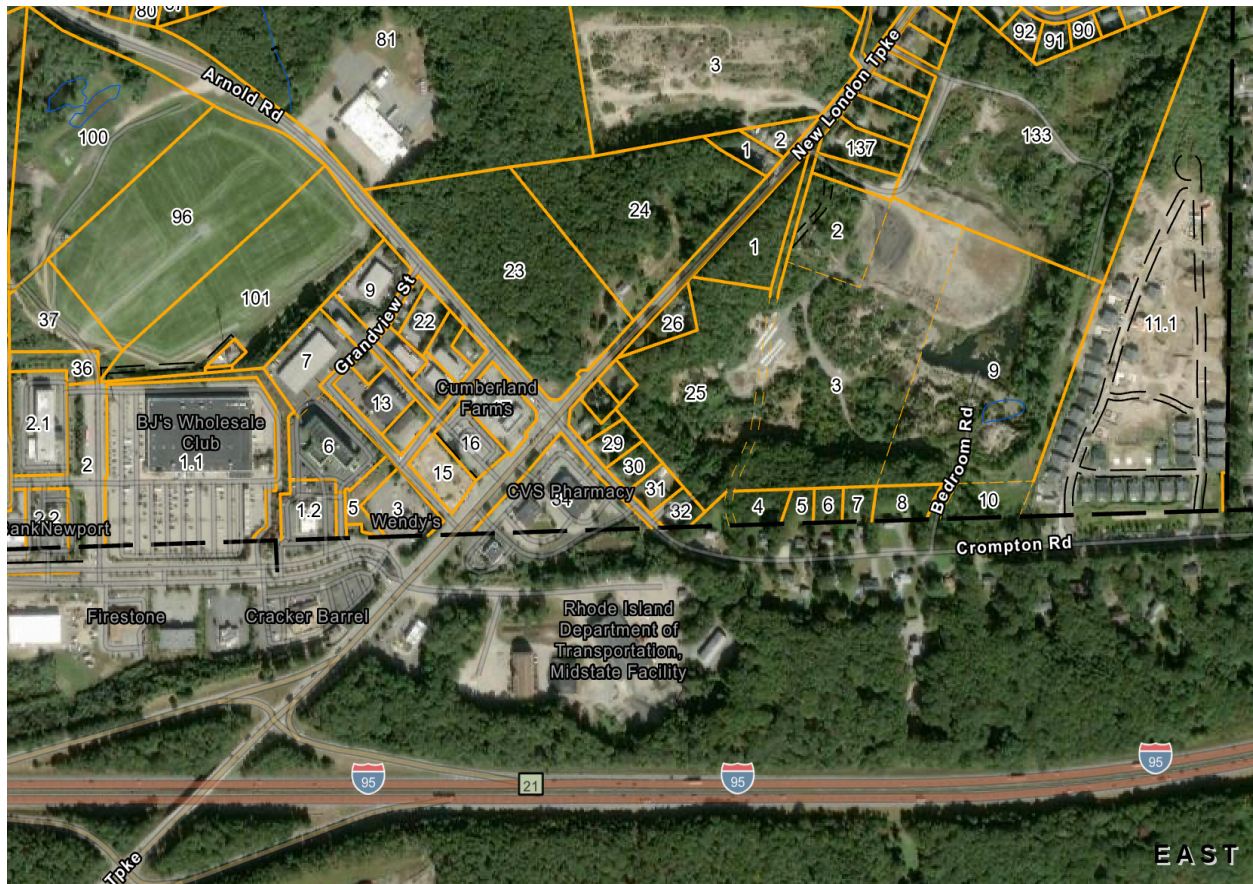
*“While public water predominantly services eastern Coventry...Another sewer line in eastern Coventry services the new Business Park that is being constructed along Hopkins Hill Road and New London Turnpike...Overall, eastern Coventry can be described as a densely-populated suburban community whose history has shaped its development pattern. **It is only in this area that public facilities and services are provided or planned.**”*

B. The Plan seeks to Increase Commercial Opportunities and Strives to Enhance the Character of the Commercial Areas. [Page D.1-14]

*“Coventry is predominantly zoned for residential use. In fact, over 90% of the town is currently zoned for residential purposes, while commercial, industrial, and Business Park zones comprise the remainder. Consequently, employment opportunities for Coventry residents are very limited and the brunt of the tax burden is being borne by homeowners. **The Land Use Plan seeks to mitigate the imbalance, by increasing the areas planned for commercial, industrial, and service-related activities where appropriate.**”*

Another important area detail, and one that exemplifies the appropriateness for seeking a uniquely crafted zone change that permits the variety and intensity of land uses necessary for achieving development success, is proximity to Interstate-95. The Property specifically, and surrounding intensity of commercial and residential land uses in general, including the CNE Business Park, are all literally situated at the Exit 21 Interchange, which provides direct and easy access, as well as averting the need to traverse through any abutting lower-density residential neighborhood. Averting residential intrusion is an important consideration when rendering a determination on the appropriateness of introducing plaza scale mixed-used development. The nearest residential neighborhood(s) are situated upwards of one-half mile to the east, bordering the Town of West Warwick. Immediately surrounding neighborhood details are illustrated the following page, as excerpted from the Town’s GIS.

The Property and several immediate parcels, to include those situated directly across Arnold Road, are presently zoned in an Industrial 1 District (“I-1 District”) manner. Furthermore, a sizable quantity of properties sandwiched between Hopkins Hill Road, Arnold Road, and the Town of West Greenwich, are all zoned in a Planned Business Park manner (“BP District”). And finally, all parcels situated to the east side of the Property are zoned in a Residential 20 District (“R-20 District”) manner, clearly detailing the ‘transitional’ distinction between the Property and the easterly most side of the community, New London Avenue serving as the physical feature that separates the two (2) districts. Nevertheless, the vast presence of the R-20 District (being



the sole high-density residential zoning designation) along the eastern most side of the community, evidences the synergy between dense commercial and residential land usage, and the appropriateness of locating them in a mixed-manner. The referenced zoning districts are defined below, pursuant to Section 255-500 of the Ordinance:

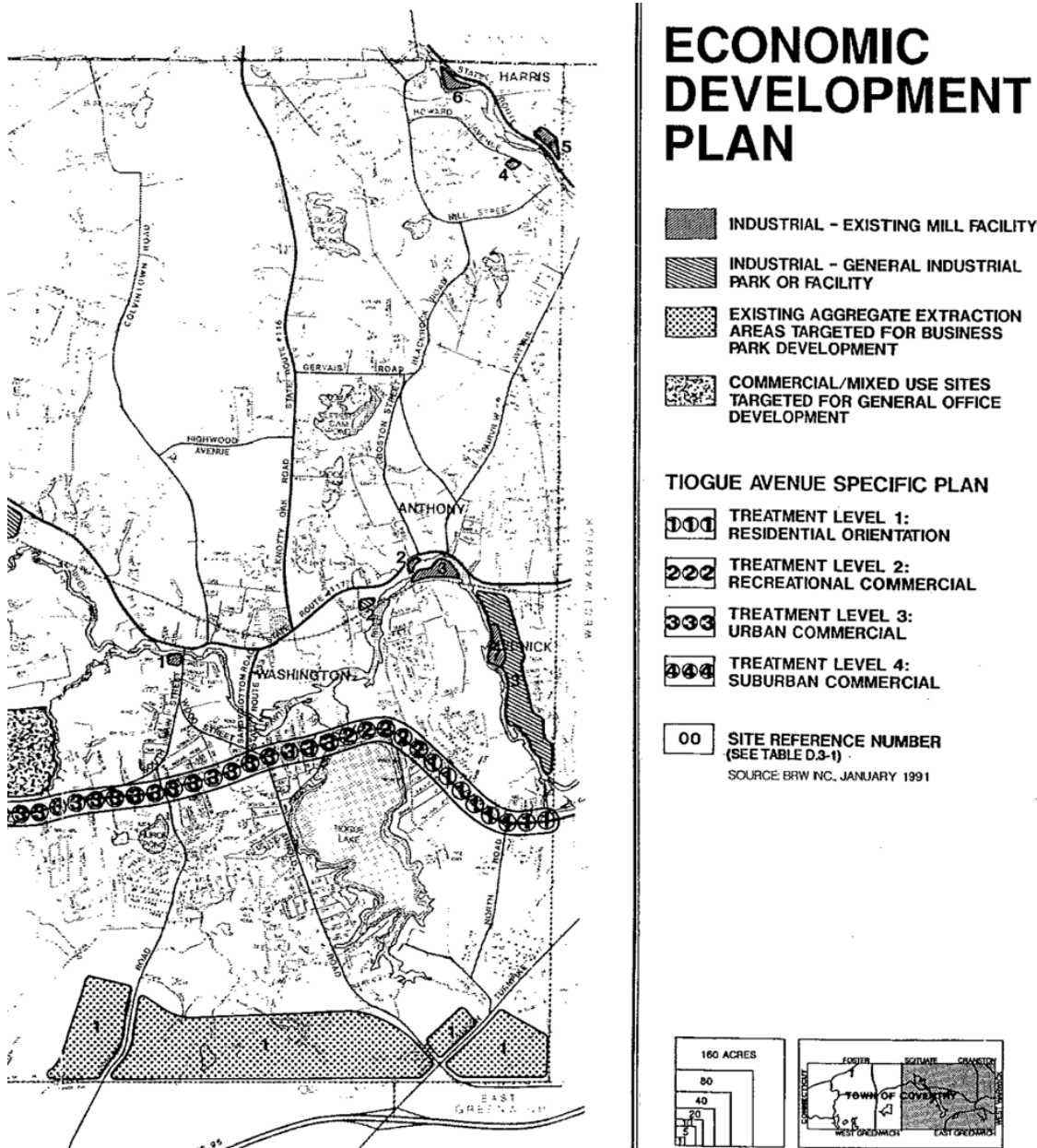
C(1). I-1 District - *"These districts are primarily large tracts of land suitable for industrial development in conformance with development standards enumerated in this chapter."*

B(4). BP District - *"This is a floating zone, the purpose of which is to denote major commercial, office and industrial centers for the Town as identified in the Comprehensive Community Plan. Proposals shall ensure a coordinated development plan where uses, traffic controls, open space needs, buffering and site appropriateness can be evaluated. Land uses in this district include all commercial uses other than heavy industrial and certain other uses specifically prohibited. Business Park Districts shall be approved as a land development project through the provisions of Article **XIV** of this chapter."*

The differences between current zoning district conditions and the zoning districts that were representative of the neighborhood a mere decade or so ago is quite dramatic, evidencing the direction afforded by the Comprehensive Plan. For example, the areas across Arnold Road to the west were predominantly industrial, now zoned in a BP District manner, acknowledging a

greater desire for a mixture of commercial (both in variety and intensity) and residential land usage. This is corroborated by present zoning designation(s) being consistent with all respective maps, most notably the 'Economic Development Plan', which has not only supported the numerous zone changes to-date, but also providing specific direction in regard to the Property proper.

The Economic Development Map, illustrated below, details support for expansion of the variety of land uses afforded by the Business Park onto the Property proper.



GENERAL COMMERCIAL DEVELOPMENT APPROPRIATENESS

It is abundantly clear that the Town of Coventry generally supports highway oriented businesses in the subject general locale, as evidenced by the extensive review of the Comprehensive Plan, in addition to the blending of high-density residential development. This is supported by the limited community-wide resources capable of accommodating such intensity, and necessary to ensure a stable fiscal and residential environment. Exclusive of those land resources that are already protected in perpetuity through some open space mechanism, particularly in the more rural areas of Town where infrastructure is a premium, the vast majority of the Town of Coventry is zoned lower-density residential; combined residential designations occupying upwards of 90%. Furthermore, less than ten-percent of all land resources are zoned in some commercial and/or industrial manner, with only a minute portion being zoned in a BP District manner that permits greater development flexibility, in regard to both commercial and residential, amounting to less than one-percent. Finally, these limited resources are further diminished when accounting for acreage that is not developable due to lack of infrastructure and/or presence of environmental and /or site sensitive development constraints. It is for this reason why pursuit of a generic district designation will not suffice, because it ultimately fails to provide the necessary land usage flexibility. The preceding information has been excerpted from the Comprehensive Plan - Table D.1-1 'Anticipated Development Potential', illustrated below.

**TABLE D.1-1
Anticipated Development Potential,
Town of Coventry**

| Land Use Category | Total Land⁽¹⁾ Area | Buildable Land⁽²⁾ Area | Percent Land Area / | Max.Res Density Dwelling | Res. Develop. Potential | Acres/ 1,000 Persons | Popula- tion⁽³⁾ Density | Inds./Com. Land Needed | Popula- tion Capacity |
|---------------------------|--------------------------------------|--|----------------------------|---------------------------------|--------------------------------|-----------------------------|---|-------------------------------|------------------------------|
| VDR (5AC) | 19,386 AC | 14,539 AC | 48.1% | 0.2 DU/AC | 2,908 DU | - | 2.7 | - | 7,851 |
| LDR (2-5 AC) | 11,245 AC | 8,433 AC | 27.9% | 0.5 DU/AC | 4,217 DU | - | 2.7 | - | 11,385 |
| MDR (1/2-2 AC) | 5,562 AC | 4,171 AC | 13.8% | 2.0 DU/AC | 8,343 DU | - | 2.7 | - | 22,525 |
| MDR (<10,000SF) | 1,290 AC | 967 AC | 3.2% | 4.0 DU/AC | 5,159 DU | - | 2.7 | - | 13,929 |
| HDR(1/20-1/2AC) | 193 AC | 145 AC | 0.5% | 20.0 DU/AC | 2,902 DU | - | 2.0 | - | 5,804 |
| Commercial/ Business Park | 1975 AC | 1481 AC | 4.9% | - | - | 10.7 | - | 658 AC | |
| Industrial | 653 AC | 490 AC | 1.6% | - | - | 20.6 | - | 1267 AC | |
| TOTALS | 40,303 AC | 30,277 AC | | | 23,528 DU | - | - | 1,430 AC | 61,494 |

Source: Coventry Department of Planning & Development

Notes to Table D.1-1:

⁽¹⁾ Areas extrapolated from proposed Land Use Plan by Coventry Department of Planning.

⁽²⁾ Buildable Land Areas reflect a 25% reduction from Total Land Area due to wetlands, roads and other unbuildable areas.

⁽³⁾ Average population per household in Coventry derived from 1990 Census is 2.7 persons/household.

Once again, the Comprehensive Plan acknowledges the great dependency on residential property taxes as the primary fiscal resource, a dependency that is economically untenable.

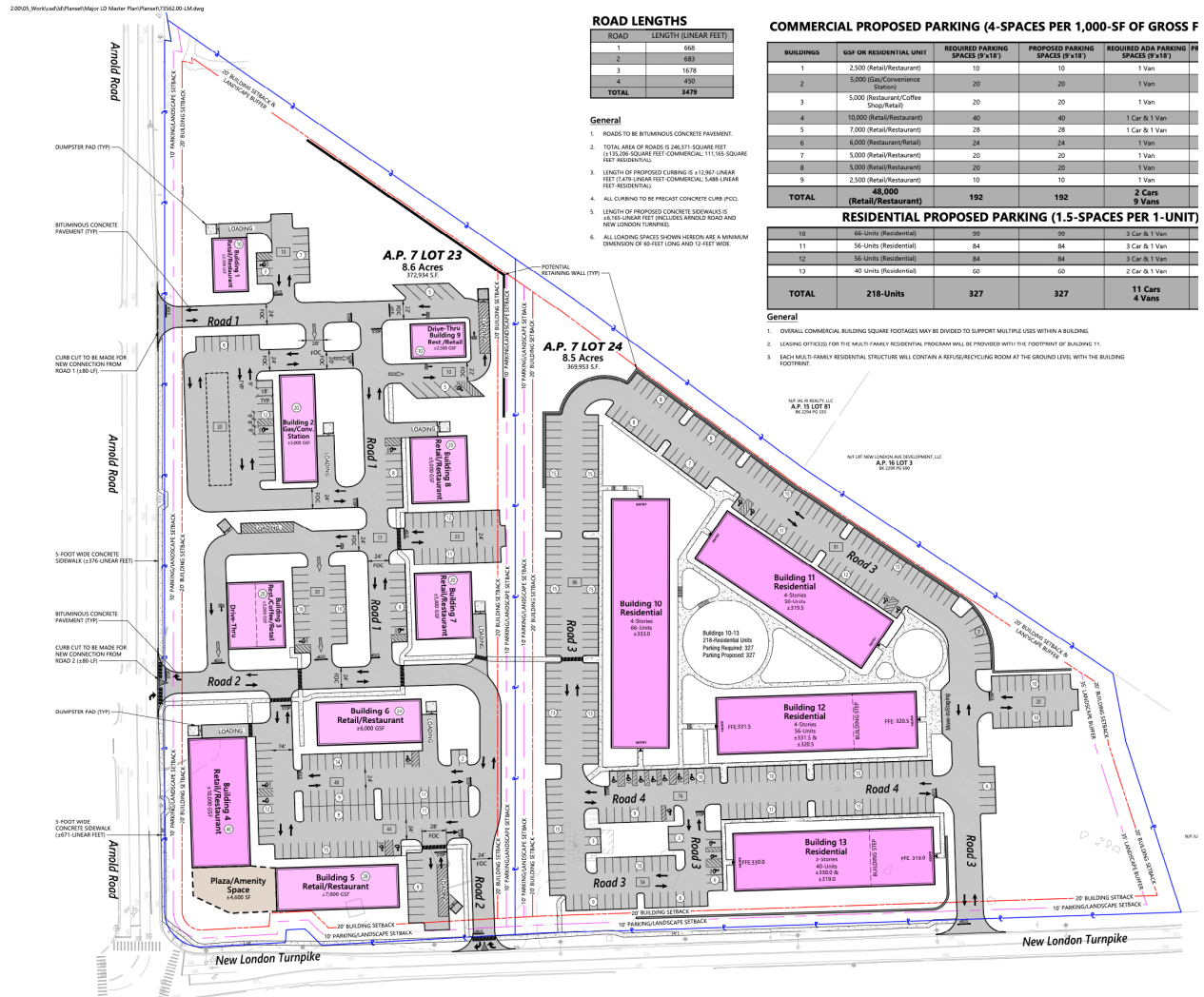
Pursuant to the Comprehensive Plan, 'residential property tax generation comprises 90 percent of the bulk of that revenue stream'. Therefore, any opportunity to realize a successful commercial venture that will generate a new revenue stream, should be well-supported.

B.9.4 Impact of Land Use on Property Tax Revenues [Page B.9-3]

- o *"Residential land uses consist of approximately ninety percent of the total land use in Coventry, with approximately three percent of the total residential valuation considered exempt from taxation (e.g. Town and state veterans, POW, Gold Star, blind, disabled veterans, religious facilities, etc.)."*
- o *"Commercial land uses consist of approximately four percent of total land use and is levied at the rate of approximately ten percent of total valuation."*
- o *"Industrial land uses consist of less than one percent of total land use and is levied at the rate of approximately three percent of total valuation."*
- o *"Agricultural land uses consist of approximately four percent of total land use and is levied approximately three percent of total valuation."*

In order to ensure the greatest balance of land uses for purposes of realizing a successful development, a variety of building configurations and overall massing and scales are proposed. This is obviously at a conceptual stage of review, and market conditions will ultimately dictate true need. Nevertheless, there are requisite foundational elements that positively contribute to the success of a development and neighborhood character, alike. Some preliminary development considerations include fronting to the extent feasible building facades, thereby screening less appealing, albeit necessary, accessory improvements such as off-street parking. In addition, providing suitable distancing from property boundaries to accommodate more notable landscaping features, thereby being the visual focal-point and enhancing development aesthetics. Such features also assist in naturally capturing and treating runoff. Another initial consideration is minimizing off-street parking and loading provisions to what is absolutely necessary; minimum requirements being based on true market, rather than man-made regulatory standards. Finally, and perhaps most importantly, is the phasing of the development; requisite commercial resources will be introduced during the initial phase. This will not only realize up-front much-needed positive fiscal revenue, but also serve to provide the services necessary to ensure successful residential development. The second 'residential' phase will benefit from the presence of these on-site commercial resources, and in-turn serve in a transitional capacity between the commercial entities to the west, and less dense residential neighborhood towards the easterly end of Town; a perfect synergy between the two (2) land uses.

The Applicant has prepared a conceptual site plan (illustrated below) generally detailing the physical layout, with the full understanding that the development must be fully engineered and designed to both Town and State regulatory standards. Preliminary Plan Stage of review will be subsequent to attaining all requisite zoning regulatory approvals.



GENERAL COMPREHENSIVE PLAN CONSISTENCY ANALYSIS

A community's comprehensive plan must be amended minimally once every ten-years, in accordance with §45-22.2-12(b) of the Rhode Island General Laws (hereinafter 'RIGL'). Albeit, the Comprehensive Plan is somewhat dated, it nevertheless remains in effect for purposes of determining consistency with pertinent local regulatory decisions, pursuant to §45-22.2-2.

RIGL §45-22.2-2 Status of comprehensive plans; relation to other statutes'

(a) "All lawfully adopted comprehensive plans shall remain in full force and effect but shall be brought into conformance with this chapter prior to July 1, 2017."

Regardless, what was most telling from a thorough review of the Comprehensive Plan, was how precise and accurate were the long-term development expectations. Most notably was the need to develop to the extent feasible the eastern most portion of the community, with particular emphasis on redirecting unnecessary and unproductive industrial operations, such as the subject former graveling operation, towards more productive tax generating and community supportive commercial entities. Likewise having an understanding that appropriately infused mixture of higher-density residential is similarly appropriate. The following language has been excerpted from the Comprehensive Plan for the express purpose of evidencing that the CNE Business Park and other commercial entities have evolved as a direct result of community aspirations. Thereby affirming that similar future mixed-use development decision(s) will likewise realize requisite Comprehensive Plan 'consistency'.

B.3.1 Existing Land Use Pattern - *"The general pattern of development in Coventry occurred along the major thoroughfares throughout the Town...In the mid-1960's, Interstate 95 and Interstate 295 provided easy access to Coventry for Providence commuters. As a result, opportunities for development in southeastern Coventry were recognized and the Town has become increasingly urbanized..."* [Page B.3-1]

B.3.2 Existing Zoning Pattern and Regulations - *"The Town of Coventry currently enforces a zoning code to regulate the type of land use permitted within a described zone. The existing Zoning Ordinance was prepared in 1994 and was most recently amended on May 19, 1997. The Town of Coventry is divided into ten zoning districts that are described below:"* [Page B.3-7]

• **Planned Business Park (BP)** - *"This district is floating zone in which one or more parcels of land are developed as a coordinated site to provide for major commercial centers for the Town. Land uses in this district include all commercial and industrial uses other than heavy industrial uses and certain other uses specifically prohibited. A Business Park project must be proposed as a Planned Development, also known as a Land Development Project."* [Page B.3-9]

"The Business Park zone currently lies in the southeast portion of Coventry in between Hopkins Hill Road and Arnold Road, near access to Interstate 95, covering approximately 319 acres of land or roughly 0.8% of Coventry."

*"Overall, no significant changes in these land use contributions have occurred in the period FY 1995- FY 1999, as illustrated in Table B.9-3. The nature of the Town remains a suburban "bedroom" community with limited commercial and industrial activities. Residents generally work outside the Town of Coventry and carry on a significant portion of their business transactions elsewhere. With the vast majority of Town revenues needed to support School Department operations, the Town must maintain an extremely fiscally responsive posture to utilize the remaining portion of its revenues to the fullest extent possible to provide a wide variety of services and facilities to its citizens. **As a result, as the Coventry Comprehensive Community Plan is formulated, serious attention must be paid to examining options to increase the Town's revenue base in an environmentally responsible manner which preserves the suburban and rural lifestyles so valued by community residents.**"* [Pages B.9-3 - B.9-6]

Goal 1: *"Guide the rate, location, and character of development by taking into account the natural characteristics of the land (including suitability for use), protection of natural, historic, cultural and scenic character, and the capacity of existing and planned public and private services and facilities."* [Page C.1-1]

Objective 1.3: *"Carefully review all proposed development projects to ensure that all State and Town standards are met relative to maintaining environmental quality, and overall public health and safety."*

Objective 1.5: *"Provide buffers between residential, commercial and industrial land uses where appropriate."*

Goal 2: *"Encourage commercial, industrial, and office development in specific areas of coventry."* [Page C.1-2]

Objective 2.6: *"Continue to improve Land Development standards in order to achieve safe and attractive commercial development."* [Page C.1-3]

ZONE CHANGE: 'INDUSTRIAL DISTRICT' to 'COVENTRY CENTRE PLANNED DISTRICT'
[Special Unique Provisions to Address Unique Characteristics of Property and
Surrounding Uses as Individually Identified on the Ordinance Amendment
Prepared by Legal Counsel]

A zone change is absolutely mandatory in order to realize successful development of the Property for appropriate and flexible mixed commercial and residential land usage. The results of the Comprehensive Plan analysis clearly acknowledges support for development of the Property. The Applicant thus seeks a zone change of the Property from the present '**Industrial District**' designation to the uniquely crafted '**Coventry Centre Planned District**' designation, reflecting existing area conditions and fulfilling numerous Comprehensive Plan goals and objectives. The referenced zone change will ensure neighborhood character consistency.

"The intent of the Visions, Goals and Objectives is to:"

- **"Protect cultural, natural and historic resources, and encourage the development and maintenance of compatible land use zones through comprehensive land use planning."**

Interpretation of Land Use Map Boundaries - *"The land use boundaries illustrated on the Land Use Plan Map utilize natural or man-made boundaries wherever possible. Where the boundaries are not readily distinguishable, variations may be allowed, provided the spirit of the Land Use Plan is not violated. With proper buffering and site planning techniques, variations can be allowed without diminishing the intended goals of the Land Use Plan."* [Page D.1-27]

Consistency with Existing Zoning Map - *"The Land Use Plan map is consistent with the existing zoning map with the exception of the following:"* [Page D.1-28]

4. "The Land Use Plan designates adjacent areas in the vicinity of Arnold Road and New London Turnpike, currently zoned for industrial (I-1) and residential (R20) use, as appropriate for future Business Park proposals."

MAJOR LAND DEVELOPMENT PROJECT REGULATORY ANALYSIS

It is the professional opinion of this Consultant that the subject development proposal is in accordance with the respective goals and objectives of the Comprehensive Plan. Public water and sewer, as well as all pertinent utilities, are available and will be accordingly connected. Furthermore, in addition to being located directly amidst several major commercial corridors, the Property is within proximate distance of Interstate-95. And finally, it is most assuredly in character with the surrounding neighborhood, being similarly improved.

In order to attain Major LDP approval, the applicant must assure the Planning Board that all required standards pursuant to Article III.A 'General Requirements' of the Development Regulations, are adequately satisfied.

Article III.A 'General Requirements' - *"The requirements listed below shall be applicable to all subdivisions submitted for approval, unless otherwise specifically provided. Prior to approval of any subdivision or land development project, the Commission or the Administrative Officer shall make positive findings on all of the applicable standards listed below, as part of the proposed project's record. If a negative finding for any of these standards is made, the Planning Commission or Administrative Officer shall have grounds for denial of the project design."*

1. *"Each subdivision shall be consistent with the requirements of the Coventry Comprehensive Community Plan and/or shall satisfactorily address the issues where there may be inconsistencies."*

The proposed development project, as this report has well documented, will realize neighborhood compatibility. The area in question is quite suitable for general commercial and residential land usage, particularly service oriented uses serving both local and regional needs, being located in proximity to Interstate-95. Comprehensive Plan consistency has been evidenced throughout this report. The area is clearly free of any development constraints, and will realize a development that furthers all detailed architectural and site design guidelines.

2. *"Each lot in the subdivision shall conform to the standards and provisions of the Coventry Zoning Ordinance."*

The proposed mixed-use project will be established in accordance with a uniquely crafted district designation, otherwise entitled the 'Coventry Centre Planned District', which is appropriate given the immediately surrounding neighborhood development character and recognition by the Comprehensive Plan as has been well detailed throughout this report.

3. *"In subdivisions requiring individual sewage disposal systems, no building lot shall be designed and located in such a manner as to require relief from the Zoning Ordinance, as amended."*

Not applicable. All requisite infrastructure, most notably public water and sewer are available, and will be accordingly connected.

4. *"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 development is presently at the Master Plan, or conceptual plan stage of review and approval. If successful in attaining a conditional approval and subsequent zone change, the development will then proceed onto Preliminary Plan Stage in which all detailed engineering and site design will be prepared in accordance with all pertinent regulations, both local and state. However, at this early stage of review, from a purely land use perspective, there does not appear to be any site conditions that would preclude development of the Property in the manner so proposed. All requisite infrastructure is present, to include appropriate roadway network. Surrounding land usage also evidences development appropriateness.

5. *"Subdivision, as proposed, will not result in the creation of individual lots with such physical constraints to development that building on those lots according to pertinent regulations and building standards would be impracticable."*

No actual subdivision is proposed. Regardless, there does not appear to be any constraints to development at the present Master Plan, or conceptual plan stage of review. All engineering and site design will be effectuated during the Preliminary Plan stage, evidencing site development appropriateness. All requisite infrastructure is present, to include appropriate roadway network.

6. *"All proposed land developments and all subdivision lots shall have adequate and permanent physical access to a public street. Lot frontage on a public street without physical access shall not be considered in compliance with this requirement."*

The Property will be furnished with more than sufficient permanent points of ingress and egress from both Arnold Road and New London Turnpike.

7. *"Each subdivision shall provide for safe circulation of pedestrian and vehicular traffic, for adequate surface water run-off, for suitable building sites, and for preservation of natural, historical, or cultural features that contribute to the attractiveness of the community."*

There are neither natural, historical or cultural features on, or in proximity to, the Property that would preclude development in the manner so proposed. Regardless, the development is at the

Master Plan, or conceptual plan stage of review. The development will address all referenced design standards during the Preliminary Plan Stage, and in a manner that satisfies all local and state regulatory standards.

8. "The design and location of streets, building lots, utilities, drainage improvements and other improvements in each subdivision shall minimize flooding and soil erosion."

Once again, the development is presently at the Master Plan, or conceptual plan stage of review and approval. If successful in attaining a conditional approval and subsequent zone change, the development will then proceed onto Preliminary Plan Stage in which all detailed engineering and site design will be prepared in accordance with all pertinent regulations, both local and state.

9. "Design of the subdivision shall be in such a manner as to economize on the cost of roads, utilities and land usage, appropriate access and egress design and where necessary two means of access and egress."

At this early conceptual stage, it is anticipated that there will be two (2) independent points of ingress and egress from each respective roadway, for purposes of accommodating employees and customers, residents and guests, and emergent vehicles, alike. Given the presence of two (2) roadways and expansive road frontage, in addition to introduction of multiple pad-sites, this is most appropriate.

10. "Any development which falls within the criteria set forth in the Coventry Soil Erosion and Sedimentation Control ordinance shall prepare proper erosion control measures as required by said ordinance."

Will be appropriately addressed during the Preliminary Plan Stage of review and approval, when all pertinent engineering and site design standards are prepared in accordance with all local and state regulations.

11. "The use of open space in a Residential Cluster Development or Residential Compound is an appropriate use and is consistent with the requirements of Article 13 of the Zoning Ordinance."

Not applicable.

CONCLUSION

It is the professional opinion of this Consultant that the proposed Zoning Ordinance amendment is very appropriate, because it is clearly furthers the intent of the community to permit reasonable commercial and residential growth in an area recognized by the Comprehensive

Plan. The locale in question is clearly appropriate for the respective mixture of uses, given the character of surrounding commercial and residential development and proximity to Interstate-95. Furthermore, real economic value will once again be realized in regard to the subject property. The following Comprehensive Plan language is generally supportive of the proposed land use, and therefore, the requested zone change, with special exceptions, amendment.

B.3.2 Existing Zoning Pattern and Regulations - *"The Town of Coventry currently enforces a zoning code to regulate the type of land use permitted within a described zone. The existing Zoning Ordinance was prepared in 1994 and was most recently amended on May 19, 1997. The Town of Coventry is divided into ten zoning districts that are described below."* [Page B.3-7]

- **Planned Development District (PD)** (also known as Land Development Projects) - *"These districts are floating zones composed of a variety of land uses that are created in conformance with Article 14 of the Town of Coventry Zoning Ordinance, intended to provide flexibility in development, while achieving overall high quality in a single or mixed use development."* [Page B.3-9]