



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

STAFF REPORT

Project Name:	Westwood Estates Reconfiguration Plan
Plan Type:	Major Land Development with associated Zone Change
Plan Review Phase:	Master Plan
Owners:	Hometown America Communities, LLC
Applicant:	Same
Address:	1A Liena Rose Way
Plat / Lot / Zone:	AP 32 Lot 32.1, AP 43 Lots 35 & 35.1, AP 44 Lots 4, 5, & 6 Zone PD Lot Size 219.4 acres
Existing Use:	Mobile Home Park
Proposed Use:	Same with additional 35 units
Description:	The applicant, Hometown America Communities, LLC, is proposing to increase the number of mobile home sites within the property by 35 units through a combination of the creation of new infill sites along existing roads and three (3) new private roads within the property. This proposal includes a corresponding Zone Change Application which will be subject to a recommendation by the Planning Commission and ultimately decided by the Town Council.

Please note that this Staff Report represents an updated version of the report which was submitted to the Planning Commission in advance of its August 27, 2025 meeting, when the Public Hearing for this project was initially opened. The Hearing was kept open and the matter was continued to the September 24, 2025 meeting. This version of the report is intended to replace the previous report in order to provide all relevant planning analysis, findings, and staff recommendation herein.

Background

This item previously came before the Technical Review Commission as a Pre-Application at the August 19, 2024 meeting for a proposed Major Land Development with a Zone Change of an over 219-acre subject parcel comprised of six lots: AP 32 Lot 32.1, AP 43 Lots 35 & 35.1, and AP 44 Lots 4, 5, & 6. At that time the applicant shared conceptual site plans. For this immediate Master Plan application, the applicant has proposed to increase the number of mobile home units on the properties by 46 from 466 to 512. They propose to add 35 units by creating 3 new roadways with “infill” units along those roadways, along with other areas of infill along existing roadways. It is of note that the applicant has not stated with certainty where the additional 11 units will be located that is being asked for by the proposed ordinance.

The Public Hearing on this matter was opened at the August 27, 2025 Planning Commission meeting, and was ultimately continued to the September 24, 2024 meeting. Since the August 27th meeting, there have been several small changes to the application. Primarily, the removal of the 11 units that did not have fixed/known locations, what was called “Phase II” by the applicant, and the alteration of the “Torch Lane Extension”

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

Existing Conditions



Most of the existing subject parcels are located along the east and or south of Reservoir and Airport Roads. Three parcels are entirely internal to the two largest parcels. One parcel, Lot 35.1, is located north of Airport Rd.

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

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

As noted in the narrative, the subject parcels lie mostly within Flood Zone X. Some portions of the southeastern parcel are located within 'Zone X-0.2% Annual Chance Flood Hazard' and some portions are located in the 'Zone AE – Special Flood Hazard Area with Base Flood Elevation.' There are wetlands and watercourses on the southeast parcel, and the parcels do lie within a groundwater protection area. A portion of the site does fall within the overlay of a Natural Heritage Area. Additionally, a RIDEM permit will be required because the project will disturb more than one acre of land.

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

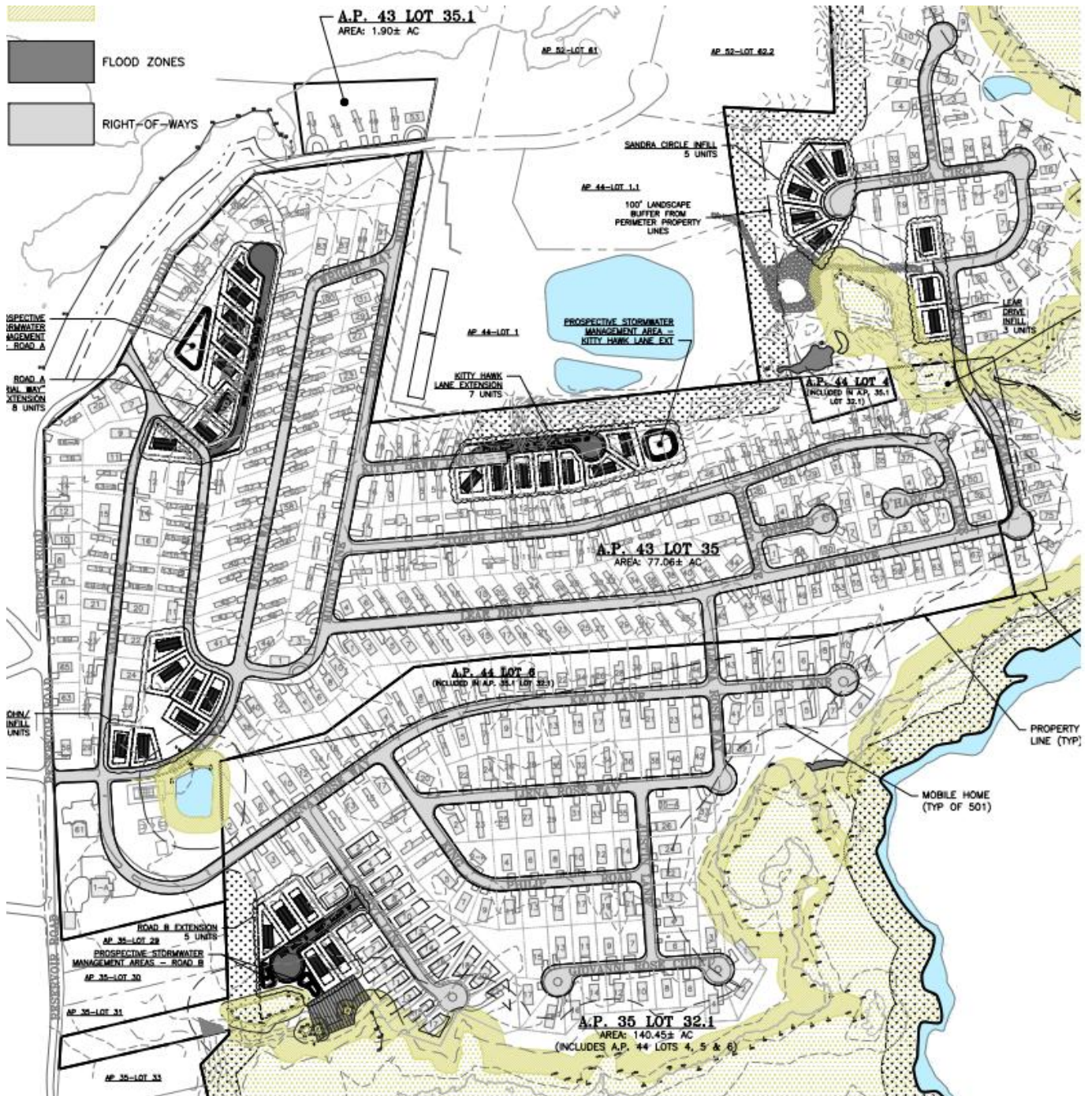
"The maximum number of licensed units that can be granted by the Town shall be limited to 32 licensed units for each 1,000 inhabitants of the Town. Data from the United States official decennial census shall be utilized in determining the official population of the Town; provided, however, that an applicant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

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

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

Proposed Conditions

The applicant is proposing to further develop the Westwood MHD site by adding 35 new sites along existing internal roadways and three new roadways. The new roadways are proposed to be off of Aerial Way, Cheryl Lane, and an extension of Kitty Hawk Lane. Additional infill sites will be along Wright Way, and at the ends of Sandra Circle and Lear Way. A **REVISED** site plan, submitted September 3, 2025, providing a general overview of the proposed new layout of the mobile home sites can be seen on the following:



The project will create approximately 1,500 feet of roadway in three different places. Road "A" will come off of Poppin John Lane with 7 new units. Road "B" will be off of Cheryl Lane with 5 new units. The third roadway is an extension of Kitty Hawk Lane with 7 additional units. There is one item of note with the proposed Kitty Hawk Lane extension. There is substantial encroachment from the north around the area that this roadway would occupy. This would seem to require resolution between the property owner and abutter as a civil matter before construction could begin.

The applicant has provided areas on the proposed plans for conceptual locations of stormwater management. Detailed stormwater design and calculations will be required at Preliminary Plan Stage. Previous expansions of the park have occurred with limited stormwater infrastructure, most recently Cheryl Lane. This will have to be taken into consideration as there is now a chance to correct any missed stormwater infrastructure needs.

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

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

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

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

The applicant was asked to calculate the amount of open space located in the park. The applicant stated that they are just above 18% open and recreation space with the current configuration. For reference, 10% is the minimum required as per §255-1120B.(4). The new configuration with the new infill and roadways would result in an open and recreational space calculation of 14.74%. It is important to note that the majority of development proposed by the applicant would be on open and recreation space, with the exception of the Kitty Hawk Lane extension and the associated new site along that extension, and one new site of the "Lear Way Infill" section.

Several public comments of the residents of the Westwood Estates addressed their concern of loss of open and recreation space as an important amenity to the Park. Two of the areas being taken up by new infill sites, the area along Wright Way and the area at the top of Lear Drive, are currently being used as community open space, and the residents would like to see that space saved. On September 5, 2025 an email was sent to the applicant regarding this issue, looking for either the replication of some community open space, or, if possible, the saving of the currently used open space. On September 15, 2025, the applicant confirmed that they were satisfied with the current design containing 14.74% open space that the proposed site plan is already providing. It is Planning Staff's view that these important community spaces should be either replicated/relocated or preserved in place as part of this current proposal.

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

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

Additionally, the original proposed plans showed units located on "Road B", off of Cheryl Lane, that would be located within the 100' buffer as required in §255-1120B.(3). The applicant's engineer responded by saying they would redesign the roadway or remove the units so that resubmitted plans at Master Plan stage comply with this Code. The revised plans show that the two offending units have been relocated, and this item has been remedied.

Planning Staff had brought up the idea of connecting the proposed "Road A" with a small stub that comes off of Airport Road as they are in proximity with each other. The applicant's engineer stated that they would look into that, but added that it may add a complication as Airport Road is a private roadway and agreement would have to be reached with several parties. The applicant stated that they thought it better to have a "dead end" street instead of having a roadway that would have some measure of through traffic on it.

Zoning (Proposed Ordinance)

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

The ordinance used as the base document by the applicant's counsel was an out of date version. A new ordinance for Article XI of the Zoning Code, Chapter 255, was adopted in March of 2025. (The majority of the changes were to the procedure of the formation of a new MHD and have no effect on this application.) There were several minor changes that would need to be made to update the proposed ordinance to bring it in line with the current version of the ordinance.

Several sections included in Article XI were removed from the original proposed ordinance that Planning Staff had questions on, including requirements for lots areas and standards for roadways. It was stated by Planning Staff at TRC that, in the proposed ordinance's current form, it would likely receive a negative

recommendation based on concerns with the removing of the above noted provisions. In discussions with the applicant's counsel it was discovered that the sections were removed due to the concern that several of the property's pre-existing roadways and mobile home sites do not meet current or proposed standards and it was the concern of having to bring these pre-existing non-conformities into compliance that was the root cause of removing the sections of the code that they did. Applicant's counsel stated they were not averse to putting the items back in, provided there were sufficient protections for the pre-existing non-conforming units. In a subsequent submission the items mentioned above were placed into the proposed ordinance, along with language that further firmed up the protection of the existing non-conformities.

The current version of the ordinance supplied with the application materials has two sets of changes in it. The original ordinance is in black with the first set of changes in blue underlined text. The second set of revised changes are in purple underlined text.

It is very important to note that, while the current application before the Planning Commission has 35 additional home sites, the ordinance, as proposed, is an ask of 46 additional units. This included the 11 units that currently have unknown locations. The applicant has included materials that suggest where they would like the units to go, but the applicant does not have agreements with the owners of those units. It is unclear what the applicant's "Plan B" is.

Based upon further discussion with the applicant, the 11 units that were shown along Milton and Torch Lanes in the original plan set, and are shown on the supplemental map shown below, are meant to be flexible in their location and may be sited elsewhere. While the applicant's plan is to add 11 units by turning units sideways and placing units next to the newly turned units, the applicant stated at the TRC meeting that the units shown on the plans are for informational purposes only and do not represent the final locations of the added units. They should only be treated as an example of what the new alignment might look like. The placement of the units will depend on which owners are willing to have units relocated, or if homeowners move out and an opportunity presents itself to move an unoccupied unit.



These 11 “floating” units are of concern to Planning Staff, and staff is uneasy at the prospect of the Planning Commission approving, and therefore vesting, 11 units that do not have known locations. It is reasonable for the Planning Commission to inquire what is the applicant’s “Plan B” if such units are granted approval, and none of the 11 locations identified on the map are feasible due to owners who do not wish to participate. Can units be approved at a Master Plan stage for residing on Milton and Torch Lanes, then in Preliminary Plan stage, be re-located, for example, to Kitty Hawk Lane? The applicant was asked if they had contacted the residents of the proposed realigned units, and for additional information. In a response on September 15th the applicant provided the map above and a one-page letter with visual examples of possible units that may be realigned. The applicant stated that would only contact the owners of these units as the units come up for sale or there is owner turnover. This leads, again, to the question of should the Planning Commission approve a Master Plan with just 35 units going to known locations where the ordinance before the Town Council is asking for an increase of 46 units with the 11 units unsure of where they will ultimately go. Given the applicant does not have this information, and may not for some time, Planning Staff are concerned with the current state of this ask.

Interdepartmental Review and Comments

Please see the attached report from the Technical Review Committee (dated August 18, 2025) for interdepartmental comments on this application. There are no updated departmental comments.

Major Land Development Finding and Recommendation

Findings of Fact

Staff has conducted an orderly, thorough, and expeditious technical review of this Master Plan application for conformance with required standards set forth in RIGL Section 45-23-60, as well as in the Town of Coventry's Subdivision and Land Development Regulations, and finds as follows:

RIGL § 45-23-60. Procedure – Required findings. (a)(2) states, “The proposed development is in compliance with the standards and provisions of the municipality's zoning ordinance.”

The subject parcel is zoned PD (Planned District) that references the property is bound to the Residential Mobile Home District (RMD) floating zone.

This Master Plan decision is conditioned upon Town Council approval of a companion Zone Change application which would explicitly define the proposed density as permissible in the proposed Westwood Estates Planned District and would establish a new maximum density and limit on the number of units in this MHD.

It is Planning Staff view that the immediate Major Land Development proposal before the Planning Commission would, in fact, be in conflict with the standards and provisions of the Coventry Zoning Code, including the purposes of Zoning. At current, the code states that the density limit is 2 units per acre for an MHD Park with a maximum of 200 total units per park, as per §255-1120E (1) and (2) respectively. It is noted that the current density is 3.62 units per acre, and the current unit count is 466 in the Westwood Estates RMD. The proposed 35 units would bring the proposed density to 3.93 units per acre and the total number of units to 501. This is approximately double the allowed density according to §255-1120E.(1) and over 2.5 times the total number of units allowed according to §255-1120E.(2). It is Planning Staff's view that adding 35 additional units would only serve to exasperate the problems of density and be beyond a reasonable carrying capacity for this property.

As it relates to the issue of density and total number of units, this project would also result in the loss of two important areas used as community open and recreation space as an important amenity for the Westwood residents. While there is open/wooded space that surrounds the Westwood MHD, the loss of the most accessible and useable open and recreation space in the park, in those 2 park areas along Wright Way at the top of Lear Drive, would remove critical amenities. Such a loss of valuable community park space outweighs the potential benefits of increasing density and adding new mobile home units in these areas.

Additionally, the purposes of zoning include statements such as:

- “To provide for a range of uses and intensities of uses appropriate to the character of the Town and reflecting current and expected future needs”
- “To provide for orderly growth and development...”
- “The need to shape and balance urban and rural development”
- “To provide for the protection of the natural, historic, cultural, and scenic character of the Town and/or areas therein”

It is Planning Staff's view that based on the increase in density for a property that is already above and beyond the density maximum, and the loss of important open and recreation space amenities, that the proposal is in conflict with the above purposes of zoning.

For the reasons stated above, and as discussed through the Planning Staff Report dated September 18th, 2025, Planning Staff is of the view that this proposal is not in compliance with the standards and provisions of the zoning ordinance.

Recommendation

Given the fact that the density will be approximately 2 times what the base zoning allows in density and 2.5 times the what the based zoning allows for total number of units, and the amount of usable park space that will be lost, Planning Staff finds this proposal is not consistent with the standards for required findings of fact set forth in RIGL Section 45-23-60 as well as with the Town of Coventry's Subdivision and Land Development Regulations. Staff therefore recommends that the Planning Commission **deny** the Master Plan application, for the Westwood Reconfiguration Plan.

Zone Change Findings and Recommendation

Context

Although the ultimate authority to amend a municipal Zoning Ordinance resides with that municipality's Town Council, R.I. Gen. Laws § 45-24-51 ("Adoption – Review by planning board or commission.") establishes that the Planning Commission's role in the process begins upon referral of proposed amendments, and describes that role as follows: "...The planning board or commission shall, in turn, notify and seek the advice of the city or town planning department, if any, and report to the city or town council within forty-five (45) days after receipt of the proposal, giving its findings and recommendations as prescribed in § 45-24-52."

Findings of Fact

Staff has conducted an orderly, thorough, and expeditious review of this proposed ordinance for conformance with required standards set forth in RIGL Section 45-24-52, as well as in the Town of Coventry's Comprehensive Plan and Zoning Code, and finds as follows:

RIGL § 45-24-52 ("Adoption – Review by planning board or commission.") states that, "Among its findings and recommendation to the city or town council with respect to a proposal for adoption, amendment, or repeal of a zoning ordinance or zoning map, the planning board or commission shall:"

“(1) Include a statement on the general consistency of the proposal with the comprehensive plan of the city or town, including the goals and policies statement, the implementation program, and all other applicable elements of the comprehensive plan; and

1. Given that the applicant is proposing that the density would be approximately twice what is normally allowed by the zoning code for all other Mobile Home Districts (MHDs), and that the applicant is asking to have a total of just over 2.5 times the total amount allowed by any single MHD, Planning Staff is of the view that the applicant has not established through its submitted Planning Report and other application materials that the proposed ordinance is generally consistent with the intent of the Comprehensive Plan.

“(2) Include a demonstration of recognition and consideration of each of the applicable purposes of zoning, as presented in § 45-24-30.”

2. The purposes of zoning include statements such as:

- “To provide for a range of uses and intensities of uses appropriate to the character of the Town and reflecting current and expected future needs”
- “To provide for orderly growth and development...”
- “The need to shape and balance urban and rural development”
- “To provide for the protection of the natural, historic, cultural, and scenic character of the Town and/or areas therein”

Given that the applicant is seeking an excess of allowable density and total number of units, as referenced above, Planning Staff is of the view that the applicant has not established by the materials submitted in support of this application, that the proposed ordinance would be consistent with the applicable purposes of zoning as presented in § 45-24-30.

Recommendation

Planning Staff finds Proposed Ordinance 2025-21 is not consistent with the standards for required findings of fact set forth in RIGL Section 45-24-52 as well as with the Town of Coventry’s Comprehensive Plan and Zoning Code. Planning Staff recommends that the Planning Commission provide a **negative recommendation** to the Town Council given that the current Major Land Development application before the Planning Commission is for the approval of 35 units. Additionally, the proposed ordinance is seeking 46 units that do not have known/fixed locations at this point. Planning Staff is of the view that it is inappropriate to have different numbers of proposed units between the ordinance and the Master Plan application given that the location of the 11 additional units is not known at this time.



TOWN OF COVENTRY

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TECHNICAL REVIEW COMMITTEE REPORT

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

This matter came before the Coventry Technical Review Committee at its August 18, 2025 meeting as a Master Plan Application for a Major Land Development project with an associated Zone Change in accordance with Article V, § D.4. of the Coventry Subdivision & Land Development Regulations.

An application and plan were initially submitted for review on August 5, 2025. The applicant proposes to increase the number of mobile home sites within the property through a combination of the creation of new infill sites along existing roads and three (3) new private roads within the property (Phase 1), and the relocation/reorientation of some existing mobile homes to allow for the installation of new mobile homes on adjacent sites (Phase 2). This proposal includes a corresponding Zone Change Application which will be subject to a recommendation by the Planning Commission and ultimately decided by the Town Council.

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

Westwood Est - Current Ordinance.pdf
Westwood Est - Ltr to Town Clerk.pdf
Westwood Est - Master Plan.pdf
Westwood Est - Narrative.pdf
Westwood Est - Proposed Amendment to PD Zone.pdf
Westwood Est - Site Analysis.pdf

TOWN ENGINEER

General

- 1) Upon project completion, a Certificate of Conformance (COC) from the Engineer of Record (EOR) shall be required. The COC shall certify that the constructed project meets all required standards, regulations and specifications in the permitting and construction documents. The COC shall be focused on site civil related work. Work includes but is not limited to; all drainage

system components, drainage related to retaining wall placement, earth grading, roadway subbase, pavement, concrete flatwork, underground utilities (sewer, electric, water, etc.), survey markers and monuments and fire cisterns. EOR shall partner with a qualified sub-consultant to perform necessary inspection related duties if EOR does not perform these duties in-house. All coordination between EOR and inspection sub-consultant shall be finalized before construction commences. Separate COCs shall be required from the Structural Engineer of Record (SEOR) and the Geotechnical Engineer of Record (GEOR) as applicable. A certificate of occupancy will not be issued until COCs are received and accepted by the town.

Plans

- 1) Submission of a Town of Coventry Soil Erosion and Sediment Control (SESC) Application will be required for the project
- 2) A capacity analysis will be required for the proposed sewer connections to the existing private sewer system
- 3) A Town of Coventry Sewer Connection Application will be required for the proposed sewer connections
- 4) Stormwater management shall be provided for the proposed roadways and site that meet state and town requirements
- 5) Please describe how the existing stormwater management system operates for the entire site. Stormwater improvements were not implemented on any projects performed over the past years. What improvements are planned to address existing areas of ponding?

PRINCIPAL PLANNER DESIGNER

Major Land Development Application

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

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

Ordinance Petition

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

PUBLIC WORKS DIRECTOR

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

FIRE REPRESENTATIVE

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

POLICE CHIEF

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

PLANNING COMMISSION CHAIR

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