

**DOUGLAS R. MCLEAN, AICP**

Planning Consultant ♦ 401-474-9514 ♦ dougmclean303@gmail.com

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**Land Use and Planning Report**  
**Review of Major Land Development – Master Plan**  
**Comprehensive Permit Application**



**“The Lofts at Fairgrounds”**  
**311-Unit Affordable Housing Development**  
**in West Kingston, RI**

August 28, 2025

On Behalf of 132 Fairgrounds LLC

Review of Properties at 132 Fairgrounds Road, West Kingston, RI 02892; AP 21-3, Lot 9

## **INTRODUCTION**

This Land Use and Planning Report is submitted in support of a Comprehensive Permit / Major Land Development - Master Plan Application entitled “The Lofts at Fairgrounds” at AP 21-3, Lot 9 on behalf of 132 Fairgrounds LLC. The application is seeking a 311-unit housing development under the Rhode Island Low- and Moderate-Income Housing Act, RIGL 45-53-1. This report provides my professional opinions on the immediate application with a focus on its consistency with the South Kingstown Comprehensive Community Plan. Through the course of this report I will provide evidence to support my conclusions as it relates to the standards for a Comprehensive Permit at the Master Plan stage of review.

### Scope of Review

The professional opinions contained in this report are based on a site walk of the subject property and a review of: 1) all submitted application materials, 2) applicable sections of the South Kingstown Comprehensive Community Plan, 3) applicable sections of the South Kingstown Zoning Ordinance, 4) mapping data from South Kingstown Geographic Information System (GIS) Data Portal, 5) and other mapping data from available web-based resources. Although they make up the primary source materials, the documents referenced above do not encompass the entirety of information that I have drawn upon to make my opinions, such as additional background information on this property and my overall education, experience, and training as a planner.

## **PROJECT OVERVIEW**

The proposal is to construct six (6) multi-family residential buildings with a total of 311 rental units and a separate retail/amenity building. Of the 311 residential units, 233 units (75%) will be market rate, and 78 units (25%) will be deed restricted as affordable in accordance with Rhode Island General Law 45-53-4. The affordable units will be evenly distributed across all building types and unit sizes—studio, one-bedroom, and two-bedroom—and integrated throughout the development.

The project will redevelop an underutilized industrial parking area at 132 Fairgrounds Road in South Kingstown. The site is currently zoned IND-1 (Industrial One), and a Comprehensive Permit is being sought to allow residential development in this zone. The development will benefit from proximity to the University of Rhode Island, South County Hospital, and Kingston Station.

In addition to housing, the proposal includes a mix of high-quality residential amenities such as small retail store/coffee shop (under 5,000 SF), fitness center, community meeting space, in-ground swimming pool, walking paths, bike racks, firepit seating areas, and detached covered garages. The development will offer both active and passive recreational spaces for residents. The site will offer a total of 413 parking spaces, and will be served by public water and sewer.

# FINDINGS AND CONCLUSIONS

## Neighborhood Compatibility Analysis

The combined site and subject properties contain over 20 acres of land, designated as zoning district *IND-1* (Industrial One) which traditionally supports light manufacturing and distribution uses. This surrounding neighborhood encompasses an established industrial area with environmental sensitivities, where only clean, non-water-intensive operations are permitted. The immediate surrounding area includes industrial operations, parking areas, and institutional uses, with a limited number of residential abutters to the north. This land use context reduces potential conflicts and supports the introduction of a higher-density residential use that is compatible with existing development patterns in the West Kingston village area.

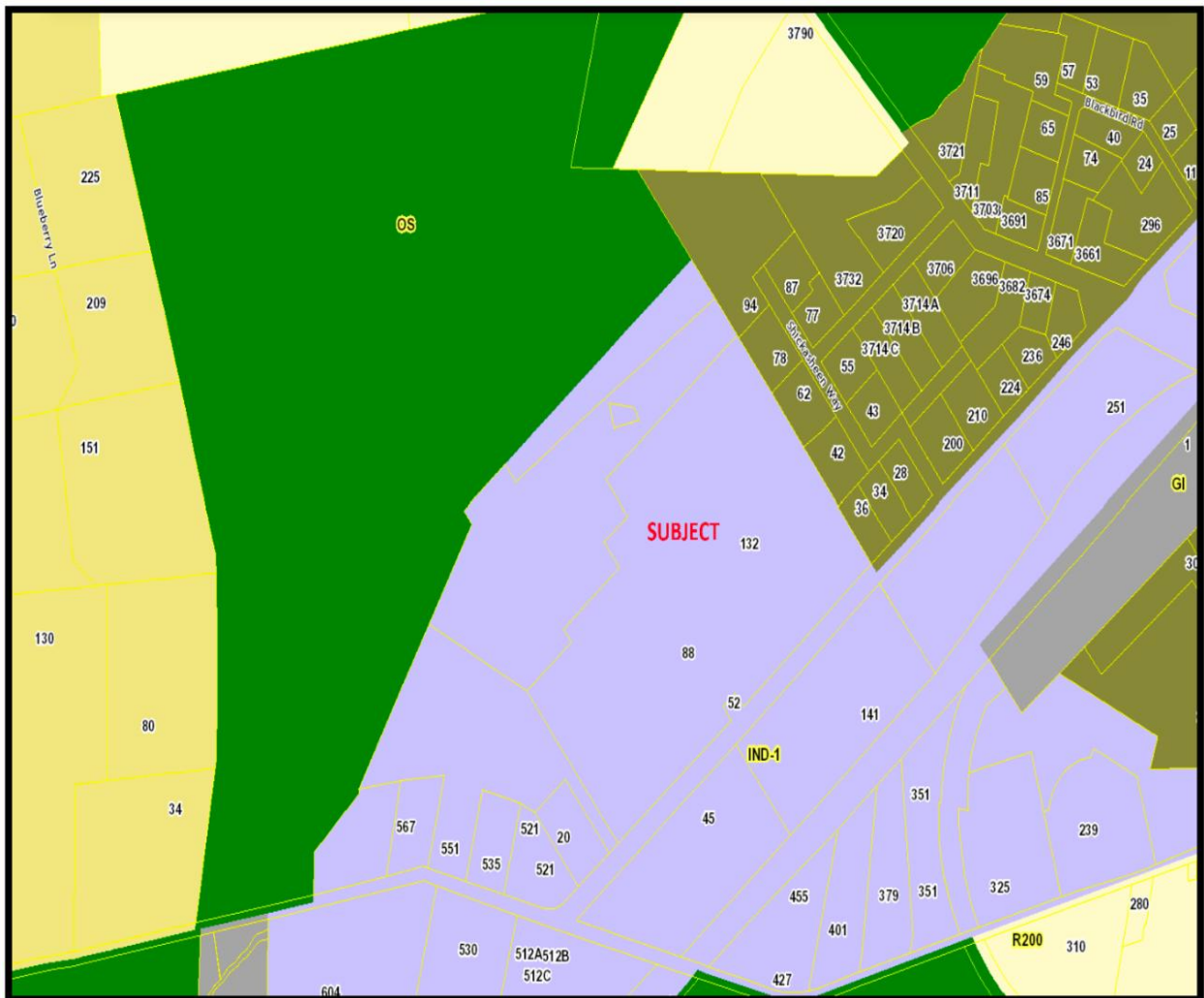


Figure 1 - Zoning Map

### Context-Sensitive Design

The proposed site layout (see *Figure 2* on following page) has been designed with sensitivity to the immediate surrounding context. The development seeks to integrate new housing units along the side and rear of the existing industrial building on the property in a manner that creates separation between the 2 uses, while maintaining a harmonious layout for interior site circulation. The design emphasizes integration of outdoor recreational features and pedestrian connectivity, including walking paths, firepit gathering spaces, and landscaped amenity zones. Additionally, internal drive aisles are designed for safe, efficient traffic flow and parking access. The 2-story amenity building (see cover page image) provides a smaller sense of building scale from the public's view on Fairgrounds Road, with the larger 3-4 story buildings located toward the rear of the site. The site's entry point is located off Fairgrounds Road in an area immediately surrounded by industrial uses, thereby reducing the nuisance factor of the traffic turning movements from the nearest abutting single-family houses.

The proposed new housing units are oriented to avoid unnecessary visual or physical disturbance to any nearby homes. By retaining existing vegetative buffers on the property where feasible, and the addition of new landscaping features throughout the property, the plan seeks to minimize potential conflicts with adjacent uses. The site plan incorporates generous setbacks from the nearest single-family homes to the north of approximately 150 feet. To the east, the site is separated from the closest single-family dwellings by the Chickasheen Brook and natural screening of approximately 2,000 feet.

### Greyfield Redevelopment

The proposal is for the redevelopment of an underutilized "greyfield" site, currently occupied by surplus paved parking for the former Schneider Electric/American Power Conversion facility. This infill approach aligns with the Town's Comprehensive Plan goals of reducing pressure on greenfields, focusing new development within already disturbed or developed areas, and utilizing existing infrastructure.

The proposed development avoids new encroachment into open space or environmentally sensitive land. The retention of the existing industrial building for re-use in more moderate, light-industrial manner supports the community's goals of fostering job opportunities and economic activity near multi-modal transportation at Kingston Station, while preserving South Kingstown's rural character and protecting natural and cultural resources.

### Village Compatibility

The new housing units reflect a level of residential density appropriate for the Village of West Kingston. As outlined in the Town document *West Kingston: Village Plan Final Report (2015)*, the community supports growth that enhances the local economy, environment, and quality of life while preserving village character. The Village Plan highlights mixed-use development—with the most common recurring idea was the possibility of mixing residential units within

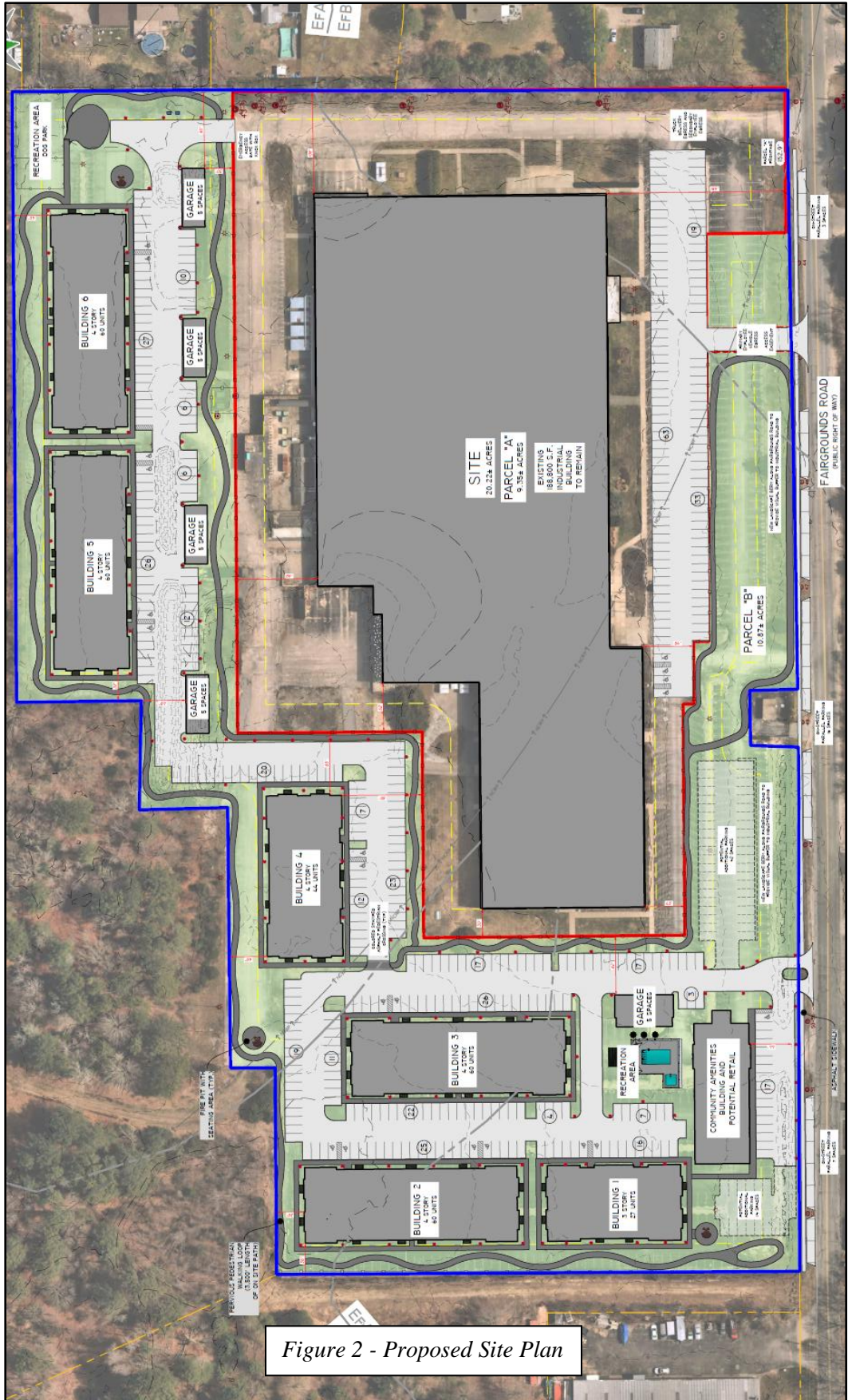


Figure 2 - Proposed Site Plan

commercial development. This is outlined as a specific avenue for measured growth in West Kingston, and is aligned with the subject application’s vision of bringing new residential uses onto a light-industrial site.

The site is in close proximity to the University of Rhode Island, South County Hospital, Kingston Station, and other key institutions, aligning with community goals to locate new housing near job centers, transit, and village-scale amenities. The design seeks to add compact, mixed-unit housing types while respecting the Village’s overall character and scale. The height of the proposed buildings does not impose a visual impact to the West Kingston core village area based on the subject property being located farther away from the major corridors in and through the Village. This is an ideal location to site a denser housing development to provide the Town with much needed affordable housing that is in close proximity to village amenities.

### Transit-Oriented Development Alignment

The subject site is less than half of a mile from the Kingston Amtrak Station, a key regional transportation asset. This proximity directly supports the Town’s objective of encouraging transit-oriented development (TOD) to reduce car dependency, promote walkability, and connect housing to employment centers. See *Figure 3* on the following page for a graphic illustration.

- The Kingston Train Station, a stop for Amtrak trains and various rail service, is within easy walking/biking distance of the subject.
- Additional public transit is also available near the subject property. RIPTA Bus Routes 64 and 66 have stops near the subject property along Ministerial Road (Plains Road). URI also provides shuttle service around the campus.

The TOD Report for Kingston Station (*Ref. Evaluating the Potential for Transit-Oriented Development in Rhode Island; 4.3 – Kingston Station, South Kingstown, RI, 2018*) emphasizes the station’s potential as a multimodal hub, citing its integration with RIPTA bus routes, regional rail access, and nearby bike infrastructure such as the William C. O’Neill Bike Path. Planned improvements—including upgraded sidewalks, bike lanes, and enhanced bus service—are specifically recommended to strengthen TOD viability. Moreover, the station area is identified as an Opportunity Zone and Growth Center, with substantial underutilized land and building space, further supporting redevelopment that aligns with compact, transit-connected land use patterns (*Ref. Evaluating the Potential for Transit-Oriented Development in Rhode Island; 4.3 – Kingston Station, South Kingstown, RI, 2018*, p. 143). Planned upgrades to the surrounding area, including the subject proposal, will further enhance its role as a catalyst for sustainable, mixed-use development in South Kingstown.

It is important to note the applicant is exploring avenues for a shuttle service from the subject property to the train station to meet the expressed needs of the future residents. The project will also incorporate bike racks and is well positioned for allowing a multi-modal lifestyle for residents.

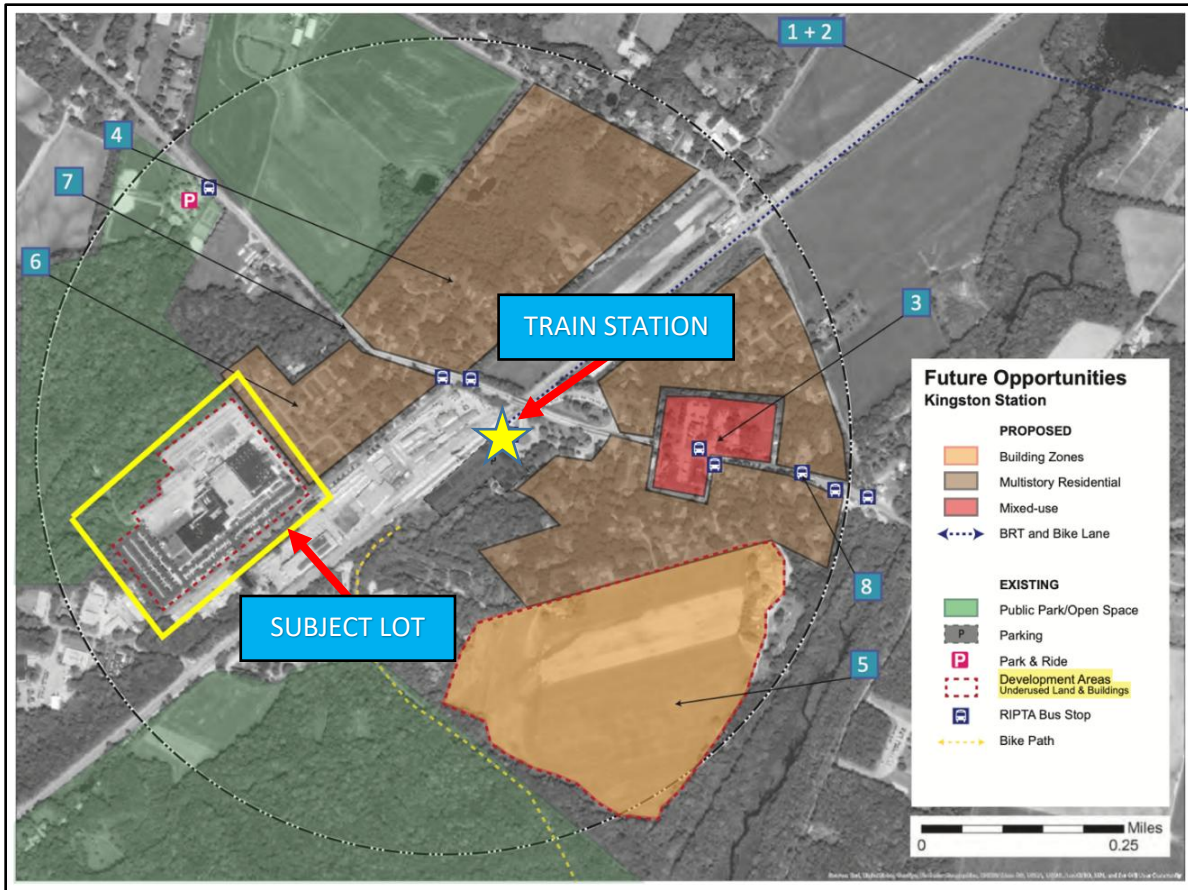


Figure 3 - Map of proposed opportunities for TOD in study area  
Evaluating the Potential for Transit-Oriented Development in Rhode Island; 4.3 – Kingston Station

### **CONCLUSIONS ON NEIGHBORHOOD COMPATIBILITY ANALYSIS:**

The preceding findings provide clear evidence that the applicant’s proposal is compatible with the surrounding neighborhood and is consistent with the character of the West Kingston village area. The proposed residential development avoids any disturbance of open space and incorporates generous setbacks, internal circulation, and vegetative buffers to minimize potential impacts on nearby homes. The applicant proposes the redevelopment of an underutilized greyfield property within the *IND-1* (Industrial-1) zoning district, an area defined by a mix of light industrial, institutional, and transportation-related uses with minimal direct residential abutters. The proposed design aligns with the Town’s vision for context-sensitive, village-oriented growth, while supporting reinvestment in pre-disturbed areas, consistent with the goals of the Comprehensive Plan and aforementioned community plans. Located less than half of a mile from the Kingston Amtrak Station, and within reach of multiple RIPTA routes and URI shuttle service, the site is ideally suited for transit-oriented housing. In my professional opinion, this proposal represents a positive outcome for the Town by addressing critical housing needs in a location that reinforces sustainable land use, supports economic development, and respects the character of the surrounding neighborhood.

## Comprehensive Plan Assessment

The most critical consideration in evaluating a Comprehensive Permit Application is its consistency with “local needs as identified in the local comprehensive community plan,” particularly as it relates to affordable housing.

The Town’s current percentage of Town-wide affordable housing is 5.72% inclusive of recent data from RI Housing that incorporates Section 8 Vouchers. As of the last data reported by HousingWorks RI, the Town would need 557 more affordable units to meet the 10% required threshold. There is a significant gap between what is affordable and what is attainable in South Kingstown’s housing market. The median household income in South Kingstown is \$108,474. However, to afford the average costs associated with a median-priced single-family home, a household would need an income of \$180,666—highlighting a substantial disparity between income levels and housing costs (p. 15). Thus, there exists a critical need for rental units that are affordable to moderate- and low-income households in the Town of South Kingstown.

The Town of South Kingstown’s Comprehensive Community Plan (2021) is the document of record as it relates to a finding of consistency. The Plan provides sufficient language and policies on the issue of affordable housing to provide evidence of the Plan’s intended direction in this regard. Throughout the following section of this report, I will cite the applicable language from the Plan and how it relates to the immediate Comprehensive Permit application.

### Comprehensive Plan Citation – A Vision for South Kingstown (emphasis added)

*(prior to p. i) “South Kingstown will fight sprawl, choosing to focus development in the defined village areas, where the infrastructure, transportation, and social networks are best suited to support new growth.”*

The above Comprehensive Plan language indicates support for redevelopment, as opposed to sprawl, as a means to achieve smart growth in village areas such as West Kingston. This is evidenced by the fact that it is listed as a top priority for the Plan’s overall vision. This is a significant statement about the Town’s commitment to housing growth within these designated village areas. This language relates directly to the immediate Application because it is the applicant’s desire to increase residential density and supply as the basis for site development.

It is my professional opinion that the immediate Comprehensive Permit Application is consistent with this “Vision” that makes appropriately placed, thoughtful residential development a priority of the Plan. The proposed development further advances the type of development sought by the Vision by pursuing a pre-disturbed location for housing within the village of West Kingston.

### Comprehensive Plan Citation – Cross Cutting Themes: Village-Centered Development

*(p. 3) “Land use in Town is focused on walkable communities, protection of rural areas, access to goods and services, more mixed-use, better transit connections, and infill development.”*

Several cross-cutting themes emerged during the development of the South Kingstown Comprehensive Plan, most notably the concept of “Village-Centered Development.” This approach promotes expanded access to goods and services, a broader mix of land uses—including mixed-use development—enhanced transit connectivity, and a strong emphasis on infill development. This guiding framework directly supports the current Application, as the proposed project advances these goals by concentrating growth within an existing village area, reducing sprawl, and utilizing established infrastructure to create a more walkable, connected, and vibrant community.

#### Comprehensive Plan Citation – Land Use; Land Use Goals

*(p. 28) “Goal 2: A sustainable rate of development will be maintained, which is consistent with the ability of the Town to provide essential services, to achieve a stable tax rate, to protect environmental, historic, and cultural resources, and to provide a healthy environment.”*

The proposal supports a sustainable pace of growth by prioritizing redevelopment within existing neighborhoods rather than expanding into greenfield areas. This approach not only protects valuable open space and natural resources but also aligns with development strategies that emphasize compact design. By directing reinvestment to areas already served by infrastructure—such as roads, utilities, and transit—the Town can deliver essential services more efficiently, reduce long-term fiscal burdens, and help maintain a stable tax base. Altogether, these strategies promote a resource-conscious, cost-effective, and environmentally responsible pattern of development that directly advances Land Use Goal 2 noted above.

*“Goal 4: The integrity of the Town’s villages will be intact, and the village-centric approach to development, which recognizes each village’s unique objectives, will be strengthened.”*

The approach for this development respects the distinct character of the West Kingston village area by promoting context-sensitive housing strategies and appropriately sited building locations and height to not overwhelm the public views from Fairground Road. The proposal supports growth that complements the unique fabric of the area and existing infrastructure. In doing so, it reinforces the Town’s village-centered vision and advances a planning approach that reflects local values related to appropriate siting of new housing developments.

#### Comprehensive Plan Citation – Land Use; Guiding Principles

*(p. 28) “The existing village areas are unique, each with its own identity and sense of place. The distinct characteristics must be protected and enhanced when planning for appropriate growth.”*

*(p. 28) “Residential development is appropriate within the existing village areas. Additional density in the villages will support the Town’s long-term economic sustainability.”*

By adding moderate residential density within the village footprint, the proposal aligns with the Town’s goal of concentrating growth where infrastructure exists, helping to support local businesses and ensure long-term economic resilience through redevelopment of existing greyfields. As explicitly defined in the ‘Western/Rural Villages’ section of the Land Use chapter, the West Kingston village area has experienced “increasing numbers of residential neighborhoods”, with existing commercial activities mainly “located within residentially zoned areas along Route 138” (p. 35) – a characterization that this proposal seeks to mimic.

*“The village areas have high connectivity, and a development form that encourages walking and biking.”*

The subject proposal leverages the village area’s proximity to transit by incorporating a pedestrian and bicycle amenities within the site design, and connections that advance transit-oriented development principles and multi-modal lifestyles.

*“Neo-traditional planning techniques, intended to enhance and improve sense of place, support of multi-modal transportation, and incorporate village-appropriate green spaces, are appropriate for the village areas.”*

The even distribution of affordable units across all buildings and unit sizes reflects a socially inclusive design approach typical of neo-traditional planning, which emphasizes community cohesion. The proposal supports the above stated planning goal by promoting a human-scaled, walkable, mixed-use environment that respects and strengthens village identity.

*“The villages are faced with economic, service, and housing affordability challenges that stand as obstacles to achieving the Town’s vision for supporting village-scaled growth.”*

The existing industrial building on-site was previously occupied by Schneider Electric/American Power Conversion (APC) facility since the mid 1990’s. The industrial uses’ workforce and associated parking demand created the site layout and asphalt landscape that exists on the property today. APC was purchased by Schneider Electric in 2012, who occupied the building until they subsequently moved in 2020. After many years on the market, the property was purchased in 2023 by the present owner (132 Fairgrounds LLC). The industrial building is currently occupied by Norpak LLC as a food packaging product manufacturer having streamlined manufacturing efficiency, reducing workforce need, thus creating excess parking on the property.

With the industrial/commercial market demand now lacking in the specified area — this is a strategic mixed-use repositioning. This proposal directly addresses these challenges by introducing new, mixed-use housing types that are more affordable by design, while reinvesting in the village core to help stabilize the economic and service base.

*“Appropriate development in the village areas is of a scale and mass, with architectural design and site planning, that creates visual interest, activates the streetscape, and encourages walking, biking, and transit use.”*

The integrated affordable housing and small retail/coffee shop amenities in the 2-story building that fronts on Fairgrounds Road helps to contribute to an engaging streetscape that supports an active streetscape. The thoughtful site planning and visually appealing design of the immediate application supports the Town’s vision for vibrant, walkable village areas.

Comprehensive Plan Citation – Table 7 Comparison of Zoning Districts & Future Land Use Map (FLUM) Descriptions  
(p. 44)

INDUSTRIAL	DESCRIPTION
<p><b>Zone:</b> IND-1</p> <p><b>FLUM:</b> Industrial Mixed-Use</p>	<p><b>Purpose:</b> To permit manufacturing, wholesale storage and distribution activities within existing manufacturing areas in West Kingston and existing mills in Wakefield and Peace Dale.</p> <p><b>Characteristics:</b></p> <p><i>Wakefield/Peace Dale</i> - This district contains existing historic mill structures in the central core of South Kingstown. Public water and sewer are required. Industry or processes that create environmental hazards or generate hazardous waste or pollutants are prohibited.</p> <p><i>West Kingston:</i> -This district contains existing manufacturing uses in the village of West Kingston. The area has environmental limitations but was previously developed as a significant area of light manufacturing, wholesale operations, and storage facilities. This area is located within the Groundwater Protection Overlay District, as such, any activity which constitutes a threat to either groundwater, surface waters, or adjacent wetlands should not be allowed. Public water and sewer may be provided.</p> <p><b>Allowed Uses:</b> Industrial land uses including light manufacturing, wholesale operations, storage and distribution facilities are allowed. This district may also allow Use Code 21, Higher Educational Institution, Privately Owned and Operated, and Use Code 21.1 Higher Educational Institution, State Owned or Operated as an accessory use to permitted primary uses.</p>

The subject site is a formerly larger industrial property that has experienced long-term underutilization due to limited market demand for full-scale industrial or commercial re-use. In response, the applicant is proposing a balanced, mixed-use approach. This proposal does not displace viable industrial activity, but rather acknowledges the lack of sustained demand and strategically repositions the site to accommodate both targeted industrial uses and critically needed housing. This dual-use strategy aligns with the Town’s goals for both economic development and housing supply through a mixed-use approach.

Comprehensive Plan Citation – Needs & Opportunities, Commercial & Mixed Use in Existing Villages

(p. 56) *“West Kingston: West Kingston contains several commercial enterprises located around the village and existing industrial areas and the Kingston Station (Amtrak), which are surrounded by and integrated with existing agricultural operations. Opportunities to grow this village exist in allowing for more limited size and scale commercial operations in keeping with the character of the village. Areas along Route 138, which include*

*existing commercial operations may be rezoned to bring existing uses into compliance and grow the village.”*

The Plan explicitly encourages growth in village areas through development that reflects existing scale and character. The applicant proposes to repurpose underutilized on-site parking for context-sensitive residential housing, addressing the demand for affordable, attainable residences. This rare redevelopment opportunity allows productive re-use of paved land—without disturbing natural resources—while supporting transit-oriented development and modest commercial expansion within the village.



*Figure 4 – On-site, existing conditions – underutilized, impervious parking area to note*

#### Comprehensive Plan Citation – Land Use Action Plan Summary

*(p. 59) “Action 2-3 Amend regulations to incorporate design standards for infrastructure improvements containing pedestrian and bicycle circulation for on-site facilities and connection to adjoining multi-modal networks, neighborhoods and villages.”*

“The Lofts at Fairgrounds” project demonstrates clear consistency with *Action 2-3* of the South Kingstown Comprehensive Community Plan. The proposal includes internal pedestrian paths, bike amenities, and strategic proximity to multi-modal transit networks, all of which support improved mobility and walkability. These elements are thoughtfully integrated with the surrounding community, reinforcing the Town’s long-term planning goals for connected, village-centered, and multi-modal development.

*(p. 60) “Policy 2.5 Support public investment in infrastructure expansions and improvements in order to catalyze private investment in land development and increase development density.”*

The proposal increases residential density on a previously developed parcel with existing infrastructure, aligning with the Town’s intent to leverage prior public investments to support smart, private-sector reinvestment. The project represents a responsible re-use of land that catalyzes compact housing growth without placing additional demand on new infrastructure systems.

The proposed 311-unit development introduces multi-family housing on a site that:

- Is within walking/biking distance of the Kingston Amtrak Station and URI, and is also not far from South County Hospital and other major employment/institutional anchors.
- Has been underutilized since the departure of its former industrial occupant.
- By creating housing in proximity to these existing assets, the project supports the densification of an already serviced and accessible area, reinforcing the Town's goal to concentrate growth where infrastructure exists.

*“Policy 3.2 Require landowners, builders, and developers to address the local impacts of development or redevelopment on the community. Such local impacts include but are not limited to: adequacy of transportation infrastructure including multi-modal transportation opportunities; pedestrian connectivity; integration with the natural and built environment, including historic, cultural and recreational resources; and the provision of essential services to the site.”*

The applicant has proactively addressed the local impacts of redevelopment by re-using previously developed land with existing infrastructure, providing pedestrian paths and multi-modal amenities, and designing buildings that integrate with the surrounding built environment.

- The project is located less than a half of a mile from the Kingston Amtrak Station, a major multi-modal transportation hub that offers rail access to regional employment centers.
- The site already has access to public utilities, roads, and emergency services.
- The redevelopment leverages these existing services and does not require major public capital investment to support the proposed density.

*(p. 63) “Policy 4.1 Support control of urban sprawl and dispersion by concentrating population density and infill development within the villages, as appropriate, and by providing these areas with mixed-uses, services, and facilities including public transportation, pedestrian and bicycle amenities, civic buildings, recreational resources, infrastructure improvements, and housing opportunities.”*

The proposed development strategy limits outward expansion into undeveloped areas, directly supporting anti-sprawl goals. By creating 311 new residential units—including 25% low- and moderate-income—the project introduces meaningful population density in a contextually appropriate location. Proposed design features and re-use of the existing property reflect the Comprehensive Plan’s intent to ensure walkable, service-rich, village-scale neighborhoods that accommodate growth without sprawl.

(p. 64) *“Policy 4.4 Provide a diversity of housing within villages that can support a mix of businesses through localized residents that have diverse shopping and employment needs.”*

“The Lofts at Fairgrounds” is consistent with *Policy 4.4* of the Plan by introducing a diverse mix of housing options within the West Kingston village area. The inclusion of affordable units and multiple unit sizes supports a broad demographic range, while proximity to regional employers and services fosters walkable, self-supporting village life. The proposal contributes to a residential base that can sustain nearby businesses and services over time.

#### Comprehensive Plan Citation – Housing, Vision

(p. 67) *“The Town of South Kingstown will include a range of housing options for its diverse population, including families, young adults, seniors, and single-person households. The Town will strive to retain the diversity of its residents. Town programs and regulatory efforts will seek to provide appropriate housing opportunities in the community with a focus on infill development and redevelopment in the village areas.”*

The proposal directly supports the Housing Vision of the South Kingstown Comprehensive Community Plan by offering a diverse mix of housing types, income levels, and unit sizes.

- The project includes studio, one-bedroom, and two-bedroom units, meeting the needs of:
  - Single-person households
  - Young adults and graduate students
  - Small families and couples
  - Seniors looking to downsize

With 25% of units reserved for low- and moderate-income households, the project addresses economic diversity, helping to retain a broad cross-section of South Kingstown residents.

#### Comprehensive Plan Citation – Housing, Goals

(p. 68) *“Goal 2: Low and Moderate - Income Housing (LMI Housing) development will occur throughout the community in a manner that is reflective of South Kingstown residents’ physical, social, and financial limitations and resources, with the goal of achieving 10% of the year-round housing stock as deed-restricted for low- and moderate-income households.”*

In light of the Town’s significant shortfall in affordable housing—current levels at only 5.20% against a needed 10%, and the evident gap between resident incomes and housing costs—“The Lofts at Fairgrounds” project plays a critical role. By ensuring that 25% of its units are allocated to low- and moderate-income households, it directly supports *Goal 2*. This development not only contributes much-needed rental housing but does so in a manner that is attuned to the social and financial realities of South Kingstown’s residents, aiding in the Town’s efforts to retain housing diversity and promote sensible growth.

### Comprehensive Plan Citation – Housing, Guiding Principles

*(p. 68) “Appropriately scaled housing, in a variety of types and sizes and serving households with a variety of income levels, is critical to the long-term sustainability of South Kingstown.”*

*“Low and moderate-income housing development proposals provide benefits to the community.”*

“The Lofts at Fairgrounds” exemplifies the type of housing development South Kingstown’s Comprehensive Plan envisions for model housing development in village areas. By providing a variety of unit types and pricing levels, and by dedicating a substantial share of units to LMI households, the project directly benefits the community and supports the Town’s broader housing and land use goals. Its scale, location, and affordability commitments make it a highly responsive proposal.

### Comprehensive Plan Citation – Housing, Review of Strategies, Comprehensive Permits

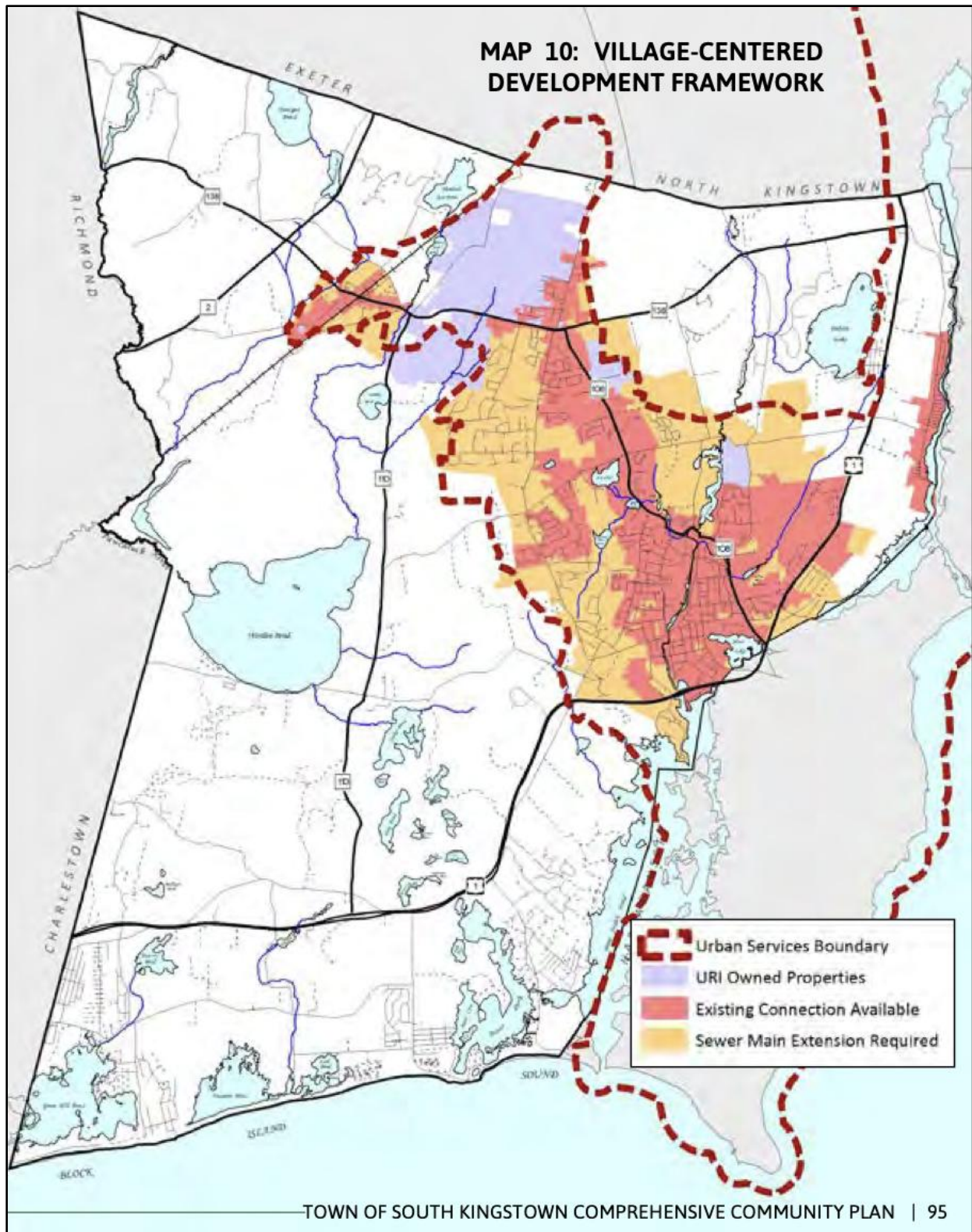
*(p. 91) “Comprehensive permits have been the dominant strategy to develop affordable units in South Kingstown and the Town will continue to pursue this strategy to meet the demand.”*

The immediate application directly supports the Town’s stated housing strategy by utilizing the Comprehensive Permit process—recognized in the Plan as the dominant and most effective approach for producing affordable units in South Kingstown. By delivering a significant number of deed-restricted LMI units, this project demonstrates a model use of the process to meet state housing requirements and local community needs.

### Comprehensive Plan Citation – Housing, Reaching the 10% Goal; Map 10: Village-Centered Development Framework

The proposal is consistent with the Town’s preferred spatial growth strategy, as outlined in the Plan (see *Figure 5*). Located within both the sewer service area and Urban Services Boundary, and within the designated growth village of West Kingston, the project exemplifies South Kingstown’s commitment to the “Village Model” of modest, place-based development. It supports the Town’s goal of concentrating infill and redevelopment in appropriate areas while meeting the community’s pressing housing needs.

As shown in Table 15 of the South Kingstown Comprehensive Plan (see *Figure 6*), Comprehensive Permits are the Town’s most productive and relied-upon strategy for creating low- and moderate-income housing. “The Lofts at Fairgrounds” contributes approximately 78 LMI units under this approach, representing a significant share of the Town’s projected production from 2020–2030. Given the limited success of other strategies, this project is both timely and essential in helping the Town meet its long-term affordability targets and the state’s 10% threshold.



*Figure 5 – Map 10: Village-Centered Development Framework  
South Kingstown Comprehensive Community Plan (2021), p. 95*

**TABLE 15: PROJECTED LMI HOUSING PRODUCTION THROUGH 2030**

STRATEGY	PROJECTED BY 2010	ACTUAL BY 2010	2010-2015	2015-2020	2020-2025	2025-2030	TOTAL NEW UNITS
Inclusionary Zoning	112	0	42	99	99	98	338
Duplexes in Core Area	12	0	0	0	0	0	0
Accessory Dwelling Units	15	0	3	8	10	15	36
Scattered Rehabilitation	12	0	8	9	10	10	37
Comprehensive Permits	150	88	79	85	93	85	342
<b>PROJECTED TOTAL UNITS</b>	<b>301</b>	<b>88</b>	<b>132</b>	<b>201</b>	<b>212</b>	<b>208</b>	<b>753</b>

Figure 6 – Table 15: Projected LMI Housing Production Through 2030  
 South Kingstown Comprehensive Community Plan (2021), p. 97

Comprehensive Plan Citation – Housing, Housing Plan Action Summary

**Goals, Policies (pgs. 99 – 101)**

*“Goal 1: The valued sense of place and community represented in South Kingstown’s existing housing stock and traditional village development patterns will be enhanced.”*

- *“Policy 1.2 Discourage future residential growth which contributes to monotonous suburban-style subdivisions and encourages a high quality of design in the creation of new neighborhoods. The process of growth must be directed towards the creation of communities and directed away from urban sprawl.”*
- *“Policy 1.3 Encourage subdivision design and redevelopment projects that support active healthy lifestyles through providing pedestrian-oriented environments, connectivity to nearby recreation resources, bicycle amenities, access to public transit, and home-based food production when appropriate.”*
- *“Policy 1.6 Support appropriately scaled housing, in a variety of types and sizes and serving households with a variety of income levels.”*

The project avoids conventional suburban sprawl by redeveloping a previously paved, underutilized industrial site located within the Town’s Urban Services Boundary and West Kingston village center. The development’s layout, scale, and amenity mix reflect a community-oriented design, not a disconnected or auto-centric subdivision pattern. With a mix of housing types, shared outdoor spaces, and thoughtful architecture, the proposal contributes to the creation of a vibrant neighborhood rather than a homogenous tract development. The project includes new pedestrian paths, bike racks, and walkable site circulation, promoting non-vehicular

mobility and active lifestyles, and includes studio, one-bedroom, and two-bedroom apartments, meeting the needs of single individuals, couples, families, seniors, and students.

*“Goal 2: LMI Housing development will occur throughout the community in a manner that is reflective of South Kingstown residents’ physical, social, and financial limitations and resources, with the goal of achieving 10% of the year-round housing stock as deed-restricted for low- and moderate-income households.”*

- *“Policy 2.2 Develop a range of LMI home ownership and rental opportunities throughout the Town of South Kingstown.”*

With 25% of its 311 units set aside as affordable—and evenly distributed among different unit sizes—the project addresses the Town’s need for diverse, well-located, and income-accessible rental housing. It meaningfully advances the Town’s goal of expanding affordable housing opportunities across all neighborhoods, helping to meet both local and state housing objectives.

#### Comprehensive Plan Citation – Economic Development, Vision

*(p. 107) “Future development should take advantage of multi-modal transportation opportunities at Kingston Station while providing diverse job opportunities for local residents.”*

The project site is located less than half of a mile from Kingston Station, which provides Amtrak regional rail service connecting South Kingstown to employment and education centers throughout Rhode Island and the Northeast Corridor.

#### Comprehensive Plan Citation – Economic Development, Goals

*(p. 108) “Goal 3: Economic development within our existing villages that contributes to a high quality of life and a resilient future will be actively supported.”*

The proposal seeks to support local businesses, institutions, and future commercial activity. By addressing workforce housing needs, enhancing transit access, and re-using existing infrastructure (minimizing new public costs), the project promotes long-term economic resilience and livability. It exemplifies the kind of village-scale development that creates shared economic value while supporting the Town’s sustainability goals.

#### Comprehensive Plan Citation – Economic Development, Guiding Principles

*(p. 109) “South County Hospital is a significant asset to South Kingstown’s long-term economic sustainability.”*

By reinforcing housing supply in the hospital’s service area, the project supports the economic and operational health of one of South Kingstown’s most important anchor institutions.

*“A comprehensive system of bikeways, walkways, linear parks, and related pedestrian and biking infrastructure is an economic development asset to the Town.”*

The project integrates internal pedestrian walking paths and bike racks, encouraging non-vehicular mobility and promoting active lifestyles.

*“A diversity and abundance of housing options in the village areas is essential to the Town’s long-term economic viability. Housing creates a customer base for local businesses and provides places for local employees to live.”*

A balanced, diverse population base, as exemplified in the proposal at 132 Fairgrounds Road, will contribute to the Town’s long-term economic and social resilience.

Comprehensive Plan Citation – Economic Development, Building Housing Diversity to Develop a Local Workforce & Support Local Business

*(p. 118) “Offering a diverse array of housing options near major employment hubs in town can help ensure that the people who work here and serve our residents can be residents themselves.” Small scale “cottage” housing and multi-family housing, whether market rate or Low-Moderate Income (LMI), are needed to attract and support our workers. Further, concentrating such homes in our village centers will provide the lower-maintenance, walkable housing opportunities desired by many seniors and young adults alike.”*

“The Lofts at Fairgrounds” directly advances the Plan’s vision of creating diverse, walkable, and affordable housing options in village centers near employment hubs. With a mix of unit types, LMI affordability, and a location adjacent to major institutions and transit, the project offers the kind of housing that allows those who serve the community to also live in it. This approach supports economic sustainability, intergenerational inclusion, and the Town’s goal of balanced, village-based growth.

Comprehensive Plan Citation – Economic Development Action Plan Summary

**Policies of Note (p. 120)**

- *Policy 2.2 Promote a well-connected pedestrian network to increase access to businesses in village areas, provide an equitable transportation system for all shoppers and workers, and support active modes of transportation.*
- *Policy 2.3 Support the installation of a connected, comprehensive system of bikeways, walkways, linear parks, and related pedestrian and biking infrastructure.*

Comprehensive Plan Citation – Natural Hazards & Climate Change Action Plan Summary

*(p. 155) “Policy 1.5 Ensure that new development occurring within the municipality utilizes current best management practices and low impact development strategies to reduce stormwater runoff and associated flooding.”*

By redeveloping an already paved industrial site, the project minimizes new land disturbance and offers a unique opportunity for environmental enhancement through site redesign. This approach aligns with the goals of the Groundwater Protection Overlay District (GPOD) by emphasizing



“The Lofts at Fairgrounds” is designed to meet all applicable drainage, erosion control, and stormwater management standards required by both the Town and RIDEM. Its location on an already paved industrial parcel limits new land disturbance and presents an opportunity for environmental improvement through site redesign. The project is consistent with the purpose of the GPOD by prioritizing infill development, modernizing infrastructure, and preserving the integrity of South Kingstown’s groundwater resources.

#### Comprehensive Plan Citation – Circulation, Goals

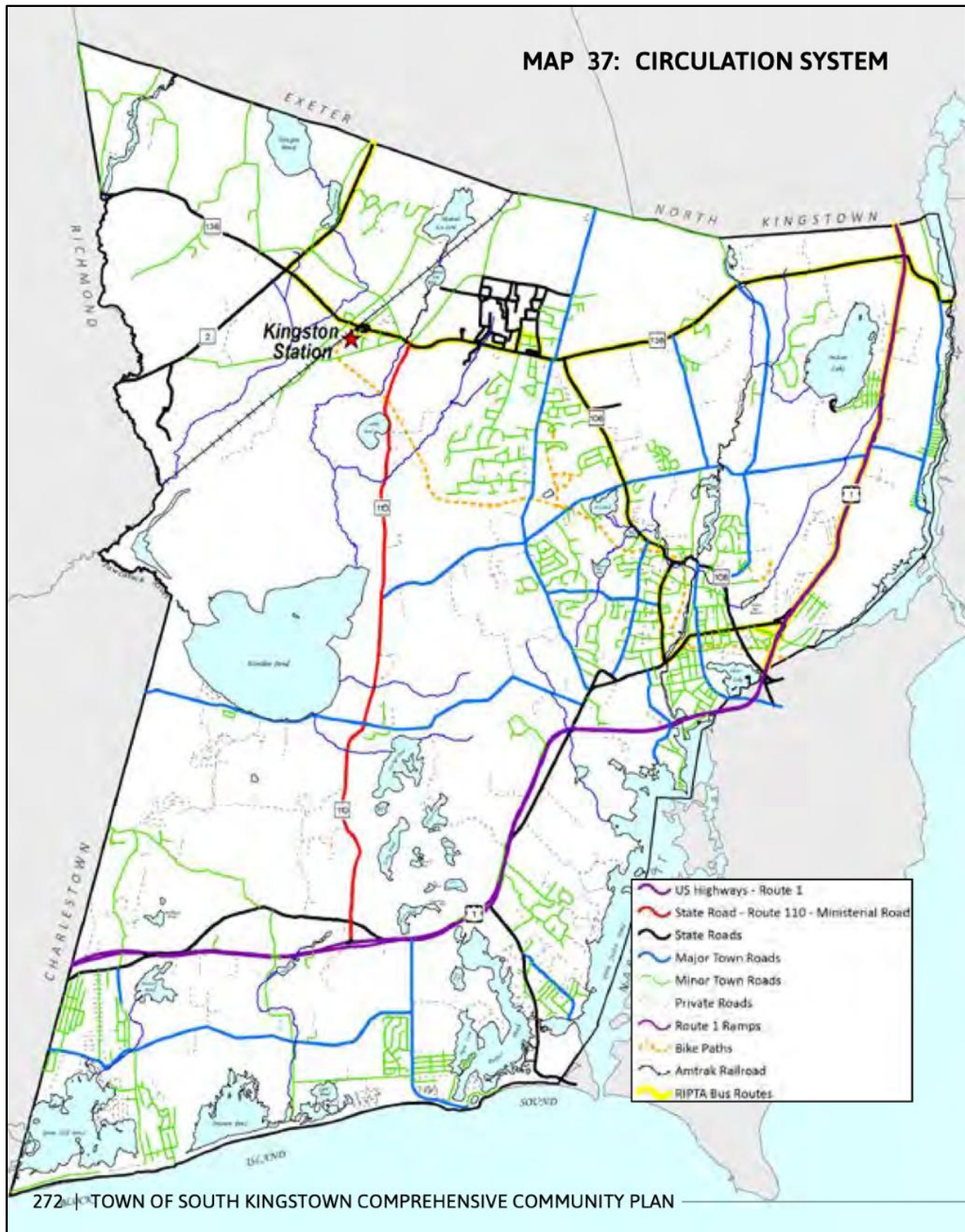
*(p. 271) “Goal 1: Multi-modal transportation opportunities for people and goods will exist throughout town to support a healthy, equitable transportation system for all residents including seniors, youth and low-income populations who may not have equal access to personal car transport.”*

By placing housing near public transit assets, as the proposal seeks to accomplish, the proposed residential development helps reduce car dependency, expand access to transportation options, and improve connectivity for seniors, youth, and low-income households—populations who may otherwise face transportation barriers.

#### Comprehensive Plan Citation – Circulation Action Plan Summary

*(p. 280) “Policy 1.1 The Town shall make every effort to encourage the viability of public transit use as an alternative to the single-occupant vehicle as a means of transportation.”*

The subject site is located less in close proximity to the Kingston Amtrak Station and is served by RIPTA routes 64 and 66, Flex Service, and URI’s UPASS program—offering a layered, accessible transit network that supports reduced car dependency and expands mobility for seniors, students, and low-income residents. See *Figure 8* on following page.



*Figure 8 – Map 37: Circulation System  
Town of South Kingstown Comprehensive Community Plan (2021)*

## **CONCLUSIONS ON COMPREHENSIVE PLAN ASSESSMENT:**

It is my professional opinion that the immediate Comprehensive Permit application is consistent with “local needs as identified in the local comprehensive community plan,” particularly with respect to the provision and type of affordable units. This opinion is informed by a thorough review of the project materials alongside the relevant policies, goals, and supporting data included in the Town’s Comprehensive Community Plan.

The Comprehensive Plan clearly identifies affordable housing as a top community priority, grounded in a Vision that calls for a range of housing options to serve diverse household types and income levels, particularly within designated village centers like West Kingston. The Plan also recognizes that the Town remains well below the 10% affordable housing threshold and is not currently on track to meet that target.

This application responds directly to that need. By proposing 311 new residential units—25% of which will be deed-restricted for low- and moderate-income households—the project will meaningfully contribute toward closing the affordability gap. It also reflects the village-scale, context-sensitive infill development model promoted by the Plan. Located on a previously developed site within the Urban Services Boundary, the proposal efficiently leverages existing infrastructure while introducing pedestrian amenities and multimodal connectivity that align with stated Town policies.

In summary, “The Lofts at Fairgrounds” is not only consistent with but directly advances the Comprehensive Plan’s strategies for housing equity, economic resilience, and smart growth. The Comprehensive Permit process remains a necessary and appropriate tool to help South Kingstown meet its urgent and long-standing housing goals, and this proposal exemplifies such.

## **Required Findings**

This application is subject to the standards of review identified in local code and state law. Throughout the following section of this report, I will cite the applicable findings for a Comprehensive Permit Application, and how the immediate proposal addresses each one.

- ***REQUIRED FINDING 1: The proposed development is consistent with local needs as identified in the Comprehensive Plan, with particular emphasis on the affordable housing plan, or the proposed development has satisfactorily addressed the issues where there may be inconsistencies.***

The immediate proposal is found to be consistent with local needs as identified in the Comprehensive Plan. Detailed planning analysis to support this finding is provided within the preceding section entitled “Comprehensive Plan Assessment.”

- ***REQUIRED FINDING 2: The proposed development is in compliance with the standards and provisions of the Zoning Ordinance and Land Development and Subdivision Regulations, or where those standards and provisions have been waived or varied, local concerns that have been affected by the relief granted do not outweigh the state and local need for low- and moderate-income housing.***

The proposal is utilizing waivers to zoning and land development standards to achieve an overall project design that includes 311 units of affordable housing to address state and local need.

- ***REQUIRED FINDING 3: All low- and moderate-income housing units proposed are integrated throughout the development, are compatible in scale and architectural style to the market rate units in the development, and will be built and occupied prior to, or simultaneously with, the construction and occupancy of the market rate units.***

The affordable units will be designed in compliance with this required finding.

- ***REQUIRED FINDING 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 Lofts at Fairgrounds” is designed to meet all applicable drainage, erosion control, and stormwater management standards required by both the Town and RIDEM.

- ***REQUIRED FINDING 5: There will be no significant negative impacts on the health and safety of current or future residents of the community, in areas including, but not limited to, safe circulation of pedestrian and vehicular traffic, provision of emergency services, sewage disposal, availability of potable water, adequate surface water runoff, and the preservation of natural, historical or cultural features that contribute to the attractiveness of the community.***

The immediate application includes materials that demonstrate compliance with applicable standards for environmental review, wetlands (RIDEM), circulation impacts, emergency response, sewage, water, stormwater, etc.

- ***REQUIRED FINDING 6: All of the proposed land development, or all lots in a subdivision, will have adequate and permanent access to a public street in accordance with the requirements of RIGL 45-23-60(a)(5).***
- ***REQUIRED FINDING 7: The proposed development will not result in the creation of individual lots with such physical constraints to development that building on those lots according to the applicable regulations and building standards would be impracticable, unless the lots are created solely as permanent open space or are permanently reserved for a public purpose on the approved and recorded plat.***

The proposed project is in compliance with the requirements that all lots have access to a public street, and no lots can be created that are physically constrained.

### **CONCLUSIONS ON REQUIRED FINDINGS:**

The proposal at 132 Fairground Road delivers much-needed housing in a context-sensitive form that respects village character, leverages existing infrastructure, and enhances access to multi-modal transportation. The project aligns with the Town’s Comprehensive Plan by supporting sustainability, walkability, and inclusive growth—advancing key community goals while thoughtfully re-using an underutilized site. It is my professional opinion that the project has successfully demonstrated it has met the required findings for approval of a Comprehensive Permit at the Master Plan stage, as articulated in local code and state law.

## FINAL STATEMENT

In my professional opinion, “The Lofts at Fairgrounds” represents a thoughtful and context-sensitive redevelopment that fully satisfies the required findings for approval of a Comprehensive Permit at the Master Plan stage. The proposal addresses South Kingstown’s critical housing shortage by providing 311 new residential units, including 78 deed-restricted affordable units, in a location that leverages existing infrastructure and services, including a TOD approach based on proximity to Kingston Station. By re-using a previously developed greyfield site, the project avoids unnecessary encroachment into open space or environmentally sensitive areas, while enhancing walkability, multi-modal connectivity, and overall community vitality. Its mix of housing types, amenities, and small-scale commercial uses will create a vibrant neighborhood environment that is compatible with its surroundings and beneficial to the wider village.

The project is also fully consistent with the policies and priorities of the South Kingstown Comprehensive Community Plan. The Plan calls for expansion of affordable housing, redevelopment within village centers, protection of rural areas, and promotion of compact, walkable development forms. This proposal advances each of those objectives. It respects the character of the West Kingston village area by situating larger buildings toward the rear of the site, maintaining streetscape appeal, and integrating landscaping and buffers to minimize impacts on nearby homes. At the same time, it strengthens the Town’s economic and social fabric by providing diverse housing options near key institutional anchors, including the University of Rhode Island, South County Hospital, which rely on a stable and accessible local housing supply.

Taken together, “The Lofts at Fairgrounds” demonstrates the type of balanced, forward-looking development that South Kingstown’s policies are designed to encourage. The project achieves multiple community goals simultaneously—expanding affordable housing opportunities, supporting transit-oriented development, reusing underutilized industrial land, and fostering inclusive, village-centered growth. It does so in a way that respects both the physical context and the long-term needs of the Town. Based on the evidence presented throughout this report, it is my professional conclusion that this proposal represents responsible land use planning and merits approval under the Comprehensive Permit process.

Respectfully,

*Doug McLean, AICP*

## **PROFESSIONAL BACKGROUND**

I, Doug McLean, have 20 years of experience working as a professional planner in the State of Rhode Island. I received a Master's Degree in Planning from the University of Massachusetts in 2007. I tested for and successfully passed the American Institute of Certified Planners (AICP) exam in 2009, and I have maintained my certification to date. I currently serve as the Director of Planning and Development for the Town of Coventry. My professional background includes a mix of private consulting work and public-sector positions with the communities of North Kingstown, South Kingstown, Cranston, and Coventry. I have been accepted as a planning expert in front of dozens of boards in the State of Rhode Island. For further details on my professional background I have enclosed my CV at the end of this report.