# REDEVELOPMENT PLAN

# Introduction

The proposed Master Plan suggests a number of discrete, but interrelated, design interventions. The results, when looked upon as a whole, describe an historic New England mill facility which can be adaptively reused while maintaining its essence as a complex; that is, the whole can be seen as being greater than the sum of its parts. Delving deeper, however, it becomes apparent that the interventions are in fact carefully tailored to those existing facilities whose configuration, condition, and location make them suitable for adaptive reuse. Each part of the complex was analyzed and, where appropriate, integrated into the plan.

The design and redevelopment strategy is both conservative and aggressive. Leveraging the proposed activities of The Community Builders, the design and redevelopment strategy capitalizes on the historic and reuse value of selected properties while at the same time recommending various new development projects. The design and redevelopment strategy envisions early phase projects to include residential developments proposed by The Community Builders and a municipal new construction project. Later phase projects include proposed private developments. The Redevelopment Plan anticipates that the market risks associated with these later phase, private developments will be substantially reduced as a result of the successful implementation of The Community Builders projects and the municipal project.

When new construction is indicated, it is envisioned as being selectively related to its immediate physical and cultural contexts (i.e., that it be contextual) and that it contribute to the history of the mill. Reestablishing quality open spaces, recreating links to the river and town facilities, and treading lightly upon the history of the existing infrastructure are considered touchstones to the design of the Master Plan. In total, the design and redevelopment strategy reestablishes the Stillwater Mill as the heart of the Village of Harrisville and as a spark to reinvigorating other commercial properties that lie outside the Redevelopment District, but in close proximity to the Redevelopment District.

## **Adaptive Reuse and New Construction**

Some of the existing mill buildings retain significant value for future use. In addition to bricks-and-mortar value, the buildings play an important role in defining the history and culture of Harrisville. Crucial to the future use of the land, however, is the mill buildings' location. Abutting the Clear River, and at times even projecting over the water, the buildings occupy sites that would be

difficult to build on today. Regulations concerning setbacks from rivers, wetlands, and utilities restrict this type of development, granting the Stillwater Mill complex an existing and almost irreplaceable relationship to an inland waterway.

Preserving some of the buildings by finding appropriate, compatible and economically feasible uses for these historic structures is critical to the success of the Master Plan. The following are proposed reuses of these buildings and sites.

• The Community Builders is proposing the redevelopment of Mill #4 (Clocktower Building) into 50 apartments, of which 30 apartments will have a long-term affordability component. The Clocktower Building is clearly the centerpiece to the complex. Its configuration, scale, and construction type lend it to reuse, which in this scenario is envisioned as elderly housing. The initial intent would be to preserve both the main concrete structure as well as its flanking brick wing extensions. Occupying three stories with a generous floor-to-floor height, the building appears capable of supporting apartment units on either side of a double-loaded corridor.

As previously discussed, the preferred redevelopment option (Option B) calls for the acquisition and demolition of the Wool Sorting and Store House, which is currently owned and occupied by the UFO Distribution Corporation. The preferred redevelopment option also calls for the acquisition and demolition of the Tank Building. The acquisition and demolition of these structures significantly opens up the site and allows for the construction of several new structures as described below.

In the event the UFO property is not acquired and demolished, the alternative redevelopment plan calls for the rehabilitation of the Wool Sorting and Store House and Tank Building and its continued occupancy by UFO Distribution Corporation and other commercial and/or light industrial uses.

Assuming the acquisition of the UFO property, a portion of the Wool Scouring Building to the west of the Clock Tower Building would be demolished which would allow for parking and vehicular parking and northerly/southerly traffic and pedestrian circulation. This partial demolition would also open up a portion of the windows in the Clock Tower Building. The remaining portion of the Wool Scouring Building would be redeveloped for ancillary uses supporting the

proposed residential uses in the Redevelopment District and surrounding neighborhoods.

• The Mill Offices (Mill House Restaurant) should focus on efforts for preserving and enhancing this low, one and one-half story wood-frame building. Maintain its use as a privately owned restaurant and investigate the possibility of expanding the commercial use to the underutilized portions of the building in rear. Incorporate it into the emerging Riverside Park through landscaping, access and parking, and site furniture.

## **New Construction**

Although the rehabilitation and redevelopment of several key structures is important to preserving the historical importance of the Stillwater Mill site to Harrisville, various new construction projects are being proposed. These new construction projects are key to replacing various structures where physical decline and/or functional obsolescence have resulted in the rehabilitation, redevelopment and reuse of these structures as not being feasible. These proposed new construction projects are as follows.

• The redevelopment plan proposes the development of Lot 204 as an elderly apartment project (Stillwater Heights). The Community Builders is proposing the development of 53 units of newly constructed, low-income supportive housing for seniors in Burrillville, Rhode Island. The proposed project, named "Stillwater Heights," will be adjacent to the Stillwater Mill Complex located off of Central Street in the village of Harrisville. The U.S. Department of Housing and Urban Development recognized the importance of this project with a \$4.9 million grant to construct the building, and an additional \$1 million in operating subsidy for the first five years of the project's operations.

The site proposed for the elderly housing is a 4.35-acre parcel of land just east of the mill complex itself, now owned by the Town of Burrillville and optioned for sale to TCB. The site is well located in a wooded area at the edge of the village center, overlooking the Clear River and in close proximity to necessary services. This site will allow the residents to have pleasant surroundings with privacy and the convenience of all the necessary services within a close distance.

This facility will provide residency for people who are over the age of 62, capable of independent living, who may need some level of supportive services to remain independent. The property will be professionally managed to ensure compliance with HUD's income and

age guidelines, and to provide a full range of services and programming to the residents. Between the building design and the service components, The Community Builders' goal is to provide a facility that responds to an aging-in-place population, which will delay the need for our residents to move to an assisted living facility or nursing home.

All units will be available to qualified, elderly low-income persons, making 50% or less of the median income. Residents pay 30% of their adjusted monthly income. The U.S. Department of HUD pays for the difference through a rental subsidy. Rent includes utilities.

Stillwater Heights will consist of a central pavilion with an elevator and two residential wings. A property management office, resident services office, and maintenance space will be centrally located on the site in the central wing. Other amenities will include a community room, laundry rooms, a community kitchen and dining area, a wooded yard overlooking the river, and a transit bus pick up area located in a weather-protected area.

The project will consist of 53 individual apartments. All but one of the units will be one-bedroom apartments meeting HUD's guidelines for size, amenities, and handicapped accessibility; the remaining two-bedroom unit will serve as the residence of the building superintendent. Approximately 25% of the apartments will be fully handicapped accessible; all other units will be adaptable for handicapped residents. Typical design features of handicapped units include kitchens with lower counters, pull-in areas for wheelchairs, controls located so that they can easily be reached and side by side refrigerators. Bathrooms will typically have roll-in showers to minimize the potential for slipping injuries. Additional handicapped features will be incorporated into the design to ensure the safety and comfort of sight- or hearing-challenged residents.

• The initial Master Plan envisioned the adaptive reuse of Mill #1 as a new town library and municipal offices. Due to site constraints and traffic circulation and parking requirements, the revised master/redevelopment plan calls for the demolition of Mill #1 and the construction of a new library. To allow for the construction of the new library, the irregularly shaped Dye House building along with the "connector" linking the Dye House building to Mill #4 will be demolished. This demolition and new construction project will accomplish several objectives. First, linkages to the existing park to the north of East Avenue along with access to the river will be enhanced. Secondly, locating the new library adjacent to the Clear River promises to create an exciting community resource and

accommodate the planned construction of a public pedestrian walkway along the Clear River. Thirdly, demolition of Mill #1 and the placement of the library facility towards the Clear River will help enable the construction of an open space, town common which was a stated goal of the public sessions.

- The preferred redevelopment plan option envisions the construction of two mixed-use buildings on the westerly side of the proposed town common. These two buildings are projected to be approximately 13,124 SF and 11,740 SF in size. The ground floor of these buildings is proposed to be for retail and/or commercial uses. The upper floors of these structures are to be used for residential purposes. The potential use of these two buildings as "work/live" space is encouraged. The acquisition and demolition of the UFO Distribution Corporation building would be required in order to allow for this proposed development. In the event that the UFO property was not acquired and demolished, a scaled back option would have to be adopted, and would entail only one the 13,124 SF mixed-use building.
- The preferred option of the redevelopment plan indicates the construction of two new residential buildings (townhouses) on the southerly end of the proposed town common. These buildings are projected to be approximately 6,640 SF and 12,000 SF in size and will be situated between the proposed Stillwater Heights project and the two proposed mixed-use structures. Construction of these two residential buildings would require the acquisition and demolition of the UFO property.

# **Redevelopment Phasing**

It is envisioned that the redevelopment of the Stillwater Mill site would occur in three phases.

# Phase I

Phase I entails the development of the Stillwater Heights elderly apartment project. Designation of the Stillwater Heights project for implementation in Phase I is due to the facts that (1) a developer is already in place (The Community Builders), (2) the project funding is close to being finalized, and (3) none of the proposed access roads and pubic parking improvements are required to support the Stillwater Heights project.

#### Phase II

Phase II includes the implementation of the Stillwater Mill Clocktower project, new Town library and construction of access roads, public parking and landscape improvements. As with the Stillwater Heights project, The

Community Builders have been selected as the preferred developer for the Clocktower project. Although planning, permitting and funding has not advanced to the stage that the Stillwater Heights project has, the Clocktower project should advance to the implementation stage within 18 to twenty-four months.

The Clocktower project will require the construction of required access roads to the site. These same access roads will also be required for the new town library. Based on anticipated public funding mechanisms for the library, it is suggested that bonding for the library include the costs associated with design and construction of access roads and public parking facilities. Therefore, design and construction of the library is also scheduled for Phase II.

#### **Phase III**

Phase III includes the construction of the two multi-use buildings and construction of two town house buildings (Redevelopment Option B). In the event that Redevelopment Option A is chosen, Phase III will include only the construction of one multi-use property. The Redevelopment Plan anticipates that the successful implementation of Phase I and Phase II will result in a significantly improved investment climate. This improved investment climate will establish favorable conditions for the envisioned multi-use and residential buildings.

# **Fiscal Impacts**

The current, total assessed value of land and buildings within the Stillwater Mill Redevelopment District is \$2,813,300. Approximately \$137,300 of the total assessed value is tax exempt. Therefore, the net total assessed value of land and buildings within the Stillwater Mill Redevelopment District is \$2,676,000. Based on the Town's current tax rate of \$19.80 per \$1,000 of assessed valuation, the Stillwater Mill Redevelopment District currently generates \$52,985 of annual real estate tax revenue.

It is difficult to project the incremental increase in assessed vale of buildings in the Stillwater Mill Redevelopment District because of the unavailability of comparable projects in the town of Burrillville. For the sake of simplicity, it is assumed that all projects within the redevelopment district will be assessed at a rate equal to \$90 per building square foot. By using this assumption, a benchmark property tax projection can be derived. Using this benchmark, a sensitivity analysis can be undertaken assuming deviations from this assumption; plus or minus. The following are the redevelopment and new construction projects that are not tax exempt and that are being proposed in the preferred option (Option B) redevelopment scenario.

PROJECT	SIZE (SF)	PROJECTED ASSESSED VALUE
Clocktower Bldg.	70,000	\$6,300,000
Apartments		
Stillwater Heights	50,000	\$4,500,000
Townhouse #1	6,640	\$597,600
Townhouse #2	12,000	\$1,080,000
Mixed Use #1	13,124	\$1,181,160
Mixed Use #2	11,740	\$1,056,600
Totals	163,504	\$14,715,360

Based on the projected assessed value of \$14,715,360 and the current tax rate of \$19.80 per \$1,000 of assessed vale, total projected tax revenue in the redevelopment district for Option B would be \$291,364. This projection represents an increase of \$238,379 over the current tax base of \$52,985.

# **Open Space**

Reinforcing the quality of open space within the complex is of key importance to the proposed Redevelopment Plan. The Redevelopment Plan incorporates several on-site areas for open space preservation and linkages with off-site open space and passive recreation areas. These on-site open space areas and off-site linkages are as follows.

#### Riverside Park

Located on the site of the former Mill #1, this park serves as the visual gateway to the complex. While vehicular access is not accommodated (except for emergency access), the park's relationship to East Avenue; the Mill Pond, falls and river; and Town amenities make it clear that this northern end of the site is an important civic resource. It is defined in large part by the waterway and historic infrastructure, the Mill Offices (now Inn at the Falls), and the L-shaped remainder of the Mill #1, which is identified for demolition.

#### Town Common

This space has the potential to serve as the defining element of the complex. It is seen as a civic space, linked via the Riverside Park to the Town's other cultural and recreational resources. It also provides an open area for community oriented activities such as a farmers market, arts and crafts fair, etc.. Through selective demolition, it offers access to both the river to the east and additional land to the south; access which is nonexistent with the current building configuration. Under the preferred redevelopment option, the town common would be bordered by residential, commercial and municipal uses, as well as several roads and parking facilities. This configuration promises to create a dynamic public space that promises to become a central focus in Harrisville and a model for Rhode Island.

#### River Walk

A progression of spaces lining the bank of the Clear River, this walk starts at the Riverside Park, appears again between the proposed library and Mill #4, and then extends to the south, beyond the mill. When seen in conjunction with the Town's parks and potential new linkages to new development to the south of the mill, this walkway becomes a connector to a much larger series of civic open spaces ranged along the river. Future expansion of this system could connect to the Town's existing right-of-way and on to the High School.

#### South Park

Currently undeveloped, this area is the single largest site suitable for new construction within the limits of the Mill. Due to restrictive setbacks, the site will yield much open space adjacent to the river, space that can be easily integrated into the future River Walk and become a passive riverside open space.

# **Parking**

The Preferred Redevelopment Plan entails the construction of 338 parking spaces. 152 of the 338 parking spaces (45%) will be developed to support specific private projects. Consequently, the cost associated with developing these parking spaces will be the responsibility of the developer. The remaining 186 parking spaces (55%) are classified as public spaces. The costs associated with the development of these public spaces will be the responsibility of the Town.

The proposed number of parking spaces will not conform to the parking requirements outlined in the Town's Zoning Ordinance as it is currently written. However, as part of the Town's affordable housing plan, an overlay zone amendment, unanimously approved on January 5, 2004, enables the Planning Board to address parking utilizing ITE Trip Generation Guide upon receiving advisory opinion of the Town Planner and Town Engineer. The Redevelopment Plan shall be reviewed as a village planned development – land development project, and take advantage of the overlay zone provisions, assuming of course, the proposed ordinance is adopted by the Burrillville Town Council on February 25, 2004.

An objective of the redevelopment plan is to maximize the preservation of open space and to encourage the sharing of parking spaces. Given the envisioned mix of land uses within the Stillwater Mill Redevelopment District, the redevelopment plan anticipates peak parking demand periods for the various land uses to occur at different times. Consequently, the envisioned number of parking spaces should be capable of accommodating parking demands at any one time. Furthermore, there are approximately 120 parking spaces outside the Stillwater Redevelopment District but in close proximity to the District. These outside spaces could possibly accommodate unusual high parking demands that may occur as a result of special events at the proposed public library.

# **Zoning Recommendations**

To implement the suggested changes for the Stillwater Mill Complex the Town should rezone the project area to accommodate the proposed mixture of uses and to encourage comprehensive site improvements.

While many of the proposed uses are currently allowed by right or special use permit, the aforementioned, proposed VPD-LDP ordinance that allows for Planned Unit Developments (PUDs) should be considered. This will also include revisions to the Town Zoning Map to identify the Stillwater Mill Complex specifically as an area where PUDs are permitted/encouraged. The PUD as defined allows for mixed-use projects developed by a single owner or a group of owners planned comprehensively. The PUD concept incorporates a great amount of flexibility. PUDs can vary in size from less than one acre to over several hundred acres and usually involve multiple land uses. The mix and orientation of allowed uses in the PUD should be compatible with each other and also in relation to the surrounding area. The goals of this type of development aim to promote a harmonious variety of uses, the economy of shared services and facilities, and the creation of attractive and efficient environments for living, shopping, and/or working.

What makes a PUD unique from traditional developments is that the development is planned and reviewed as a whole unit, rather than lot by lot. It also provides an opportunity to allow the developer greater flexibility in terms of density and use of the land. Usually, lot lines and set back dimensions are not held to the rigid requirements of the Zoning Ordinance. This flexibility is to encourage a more creative design pattern that is both environmentally and economically efficient. In return, it contains special features and greater amenities for the users of the development. Overall, this flexibility should result in a better planned and more desirable development than one bound by traditional zoning and land development regulations.

Addendum IV is a draft PUD ordinance title Village Planned Unit Development. This ordinance is creative in that it not only provides the flexibility and streamlined administrative structure necessary to encourage and respond to development opportunities, the ordinance also provides the Town a mechanism to address affordable housing needs. The key is that the ordinance responds to affordable housing needs by encouraging their location in existing built environments.

## **Environmental**

#### Wetlands

Due to the presence of water resources on and in the vicinity of the property, activities at the Site will require a RIDEM Wetlands Application. If proposed changes within RIDEM jurisdiction are limited, it is likely that a Preliminary Determination Application will be needed. However, if disturbance from excavation and/or filling within the jurisdictional wetland is proposed, an Application to Alter will be required.

In addition, this project may require a permit from the U.S. Army Corp of Engineers (ACOE) where work is located within or affects navigable waters of the United States including wetlands as regulated by the Corp under Section 404 of the Clean Water Act. If excavation and disturbance within the jurisdictional wetland is minimal, it is likely that an ACOE Category 1 – Programmatic General Permit (PGP) will be appropriate for this project, in which case the project would only be reviewed by RIDEM and a separate application would not be needed.

The permitting requirements as they pertain to freshwater wetlands can be both time consuming and a deterrent to attracting new investment and redevelopment/development projects. In past meetings between the Town and RIDEM, RIDEM has indicated that they acknowledge that the Stillwater Mill is an existing built environment and that the proposed redevelopment activities of the Town can only further the improvement and protection of the Clear River. Specifically, given that the Stillwater Mill was constructed well before the institution of stormwater management regulations, significant stormwater run-off into the Clear River from the Stillwater Mill site currently exists resulting in the degradation of the Clear River from sedimentation, salts, oils and other contaminants. The implementation of the Stillwater Mill Redevelopment District Plan will require the design and permitting of new, stormwater management systems which will eliminate that current problems.

Given RIDEM's acknowledgement of the positive impacts of the Stillwater Mill Redevelopment Project on the quality of the Clear River, the Redevelopment Plan recommends the execution of a "Memorandum of Understanding" between the Town, Burrillville Redevelopment Agency and the RIDEM. This "Memorandum of Understanding" will define key areas of understanding between the parties regarding the proposed redevelopment of the Stillwater Mill site and, assuming that these areas of understanding are conformed to, subject all redevelopment activities to RIDEM review only in the area of the design and construction of stormwater management systems.

#### Hazardous Materials

A Phase I Environmental Site Assessment is needed in order to document existing conditions as they relate to the presence or likelihood of any hazardous substances

or petroleum products on the property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater, or surface water of the property. This investigation would include a visual Site inspection to determine current conditions at the Site and to identify any evidence of previous hazardous material releases to the environment. The investigation would include a historical review that consists of a deed search, review of available Sanborn Fire Insurance Maps, Polk City Directories, and aerial photography. In addition, all reasonably available federal, state, and local regulatory files that would be expected to indicate the management of petroleum and/or hazardous materials on the Site or nearby properties would be reviewed.

It is likely, based on the industrial nature of the property, that a Subsurface Investigation would be required in order to assess any potential adverse impacts from industrial activities and/or underground storage tanks (UST's). Subsurface investigative activities would include at a minimum, the advancement of soil test borings, soil sampling, the installation of groundwater monitoring wells, and groundwater sampling.

It is likely that additional subsurface investigation activities will be needed in order to fulfill the requirements for a Brownfields Settlement Agreement with RIDEM. These requirements usually include delineating the extent of contamination and impacts to surrounding resources. Typically, an Environmental Land Use Restriction is placed on the property as a part of the Settlement Agreement.

Conditions agreed upon in a Brownfields Agreement will include clean-up response efforts. The extent of these efforts will depend upon contamination found during subsurface investigation activities and the potential or known impacts to groundwater and other surrounding resources.

# **Traffic**

There are currently no public roads within the Stillwater Mill Redevelopment District. Consequently, the Stillwater Mill Redevelopment Plan does not contemplate the closing, widening, or changing of existing streets or alleys or any other modification of the existing street layout in the project area. The Stillwater Mill Redevelopment Plan will include the construction of new access and circulation roads to support the proposed private and public investments and uses.

Both redevelopment options include five connections to the public right-of-way. Three connections are proposed along Harrisville Main Street and Central Street and one connection is proposed on East Avenue. Both the location and circulation patterns of the various roadways and right-of-way connections were developed during the master planning process and also as a result of consultations with the Town Engineer.

In conjunction with the Master Planning Initiative #1, preliminary traffic impacts of the original master plan were forecasted. Although the redevelopment plan has been amended as a result of the Master Planning Initiative #2, the overall scope and scale of both Master Plan Option A and Master Plan Option B are not significantly different from the original Master Plan. The only material road circulation differences between the initial and amended Master Plans are the proposed connections to East Avenue. These proposed connections will help reduce pressure at the East Avenue and Harrisville Main Street intersection.

The projected traffic volumes utilized for this study were developed from industry standard trip generation factors. The trip generation factors are taken from the "Trip Generation Manual" Informational Report 6<sup>th</sup> Edition (see Appendix Number 3), published by the Institute of Transportation Engineers (ITE), a national professional organization for traffic studies for various types of land uses (residential, commercial, industrial, etc.). This data has been found to be reliable and provides a sound basis for estimating trip generation volumes. The following is a summary of the estimated weekday peak periods traffic volumes generated as a result of the initial master plan.

AM Peak Hour PM Pea	k Hour					
<b>Land Code Use</b>	<b>Enter</b>	<b>Exit</b>	<b>Total</b>	<b>Enter</b>	<b>Exit</b>	<b>Total</b>
	0	1	10	1	1.0	11
Code 110 - General Light Industrial	9	1	10	1	10	11
Code 220 – Apartments	6	32	38	38	19	57
Code 253 – Elderly Housing Attached	2	1	3	2	2	4
Code 710 – General Office Building	33	4	37	16	78	94
Code 720 - Medical-Dental Building	<u>10</u>	<u>3</u>	<u>13</u>	<u>5</u>	<u>15</u>	<u>20</u>
Totals	60	41	101	62	124	186

It should be noted that a trip is defined as a one-way vehicle movement. Therefore, driving to and from the site, for example, is equivalent to two trips. For the purposes of this study the projected volumes of traffic is estimated to be new to the servicing roadway. This would result in a conservative evaluation of impacts. The trips generated by the proposed Municipal Office were not included in the trip generation due to the location of the existing offices, which is just north of the intersection of Main Street and East Avenue. These trips are already included in the existing traffic volumes.

Developing the intersection volumes to be analyzed under future conditions required estimation of a directional distribution of the development traffic. The estimate was based on the surrounding area demographics and current traffic patterns of the area roadways, including Central Street, Harrisville Main Street and East Avenue. Based upon this information it is estimated that 80% of the morning peak hour traffic and 75% of the evening peak hour traffic will be generated to/from points north of the property. Therefore, 20% of the morning peak hour traffic and 25% of the evening peak hour traffic will be generated to/from points south of the property.

The traffic volumes at the main and secondary driveways to the property can be projected using the same percentages as in the previous paragraph due to their proximity to the respective roadways. Therefore, 80% of the morning peak hour traffic and 75% of the evening peak hour traffic will use the main driveway off of Harrisville Main Street and 20% of the morning peak hour traffic and 25% of the evening peak hour traffic will use the secondary driveway off of Central Avenue.

Traffic capacity analysis was completed for the future peak hour traffic conditions. The following is a summary of the existing capacity results:

Intersection Approach	Level o <u>AM</u>	of Service PM
East Avenue		
Westbound	Е	C
Harrisville Main Street		
Northbound	A	A
Southbound	A	A
Levy School		
Eastbound	E	E

The results above indicate that the estimate increase in traffic from the proposed improvements to Stillwater Mill will have a minor negative impact in the morning peak and no adverse impacts in the evening peak on traffic operations. The negative impact occurs during the morning peak hour and affects the East Avenue approach. The vehicles on the East Avenue approach will experience longer delays once the improvements are made to Stillwater Mill.

In summary, the traffic study has shown that the proposed improvements to Stillwater Mill will maintain an acceptable LOS on the project roadways. The increase in traffic volumes projected for the Mill should have minimal effect on Harrisville Main Street and Central Street traffic operations. A more detailed analysis may be warranted as the Redevelopment Plan and its various projects are subjected to further review by the Town Planning Board.