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	Director, Planning & Zoning City of Norwalk, CT		Stantec Urban Places
File:	East Norwalk TOD	Date:	March 19, 2018

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**Reference: 230 East Avenue Peer Review**

Stantec has conducted a preliminary review of the proposed transit-oriented development (TOD) project at 230 East Avenue in Norwalk, Connecticut. The following memo presents a brief description of the project facts, an evaluation of the project in the context of the ongoing Plan of Conservation and Development update process, and an evaluation of the project in the context of TOD best practices.

This review is based on the following materials submitted to the City:

- Application for Special Permit Transit-Oriented Development (TOD) (submitted 12/14/17)
- Proposed Zoning Amendments to Section 118-700 (dated October 30, 2017)
- Architectural drawing set, including plans, elevations, sections, materials, and renderings (dated 02-14-18)
- Landscape drawing set (dated 02-14-18)

**Project Facts**

The City of Norwalk received an Application for Special Permit for Transit-Oriented Development from 230 East Avenue, LLC (the "Applicant") on December 14, 2017. The subject property is comprised of four parcels totaling 3.62 acres +/- adjacent to the East Norwalk Metro-North train station. The site is located at 230 East Avenue, bounded by East Avenue, Rowan Street, Osborne Avenue, and the railroad tracks. The Applicant proposes to adaptively reuse the existing building on Rowan Street ("Building A," former Factory Outlet building), renovating ground floor office space and creating new housing and a rooftop restaurant. The Applicant also proposes constructing two new buildings, one a five-story residential building on Rowan Street and Osborne Avenue ("Building B"), the other a small two-story retail/office building on East Avenue adjacent to the train station ("Building C").

Proposed program:

- 189 housing units (studios, one- and two-bedroom units in Buildings A and B)
  - Nineteen housing units (10%) are designated workforce units
- 39,492 square feet office (primarily in Building A, some in Buildings B and C)
- 5,550 square feet retail (in Buildings A and C)
- 4,260 square feet restaurant (in Building A)
- 15,593 square feet Pooch Hotel (existing use to remain in Building D)

Proposed parking: 311 parking spaces provided on-site

- 207 spaces in the basement of Buildings A and B
- 104 spaces in surface parking lots
- An additional 103 spaces exclusively for commuters are located on the Railroad Place parcel immediately north of Building A and adjacent to the eastbound platform. The State of Connecticut owns this parking and it is not controlled by the applicant.

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## **Plan of Conservation and Development Evaluation**

The City of Norwalk is in the process of updating its Plan of Conservation and Development (POCD, aka “The Citywide Plan”). This plan is required by state law and must be adopted by the Planning Commission when complete. It is the only plan that covers the entire geography of the city and strategically integrates priorities for many different topics and types of plans for the city.

This update process began in August 2017 and is anticipated to be complete by November 2018. To date, an existing conditions analysis, an economic development review, and a buildout analysis have been prepared and a community visioning workshop in the fall provided initial input for a draft vision statement and principles for further consideration. Neighborhood meetings are taking place in March 2018.

Land use, housing, transportation, neighborhood character, redevelopment, and zoning recommendations are some of the topics within the POCD. Since the proposed project at 230 East Avenue represents a significant change at the East Norwalk station, it merits review in light of the information gathered so far during the POCD update process.

Some of the top priorities identified by small groups at the November visioning workshop include connections and mobility, affordable housing, bike/walk friendly character, zoning and development improvements, and sustainability. Elements of the draft vision currently under review include offering a choice of housing options and providing transportation choices. Relevant draft principles for the Citywide Plan include: connect people and places, pursue high-quality development, and practice sustainability and resilience.

The proposed project’s relation to emerging POCD elements include:

- The proposed project introduces an appropriate mix of uses in an area currently zoned industrial and adjacent to neighborhood business and residential zones. This industrial zoning permits by-right uses such as manufacturing, warehouse and storage, contractor’s yards, and off-street parking facilities. The proposed uses of multi-family housing, office, retail, and dining will enliven this area throughout the day and week so that it contributes positively to street life and vitality in East Norwalk’s neighborhood retail area.
- New residents and office workers will support nearby businesses in the East Norwalk commercial area. They will have walking and biking access to neighborhood retail and services and support revitalization or redevelopment of nearby locations, for example, the fire-scarred retail building on Rogers Square.
  - A 2013 study found that the average household can support 72 square feet of retail of all types, and of which about 40 square feet are typical neighborhood retail uses, such as small grocers, pharmacies, coffee shops, florists, and so on. Knowing that not all 40 square feet of demand will be met by the closest neighborhood retail area, the study concluded that 15-20 square feet of retail per household is a safe estimate of what can be supported within walking distance.<sup>1</sup>
  - There are currently about 360 households within a 5-minute walk of the proposed TOD site, which would support approximately 7,000 square feet of retail (about the size of the six storefronts on East Avenue from Station House to Rowan Street). Adding the proposed 189

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<sup>1</sup> Hack, Gary. “Business Performance in Walkable Shopping Areas.” November 2013.  
<https://activelivingresearch.org/business-performance-walkable-shopping-areas>

**Reference: 230 East Avenue Peer Review**

units increases this by 50% to just over 10,000 square feet of supportable retail (about the size of the Rogers Square Shopping Center). Within a 10-minute walk of the site, the existing 1,720 households support about 34,000 square feet of retail. The proposed project would increase that by about 11% to 38,000 square feet of retail. This could support two to three blocks of retail similar in size to Liberty Square within easy walking and biking access. The more people who can access businesses without a car, the fewer square feet of land that needs to be dedicated to parking and the greater the area for neighborhood-serving retail.

- The proposed project will adaptively reuse the existing building on site, a sustainable option that avoids demolition and preserves a part of the neighborhood's history. The building was constructed in 1927 as a hat factory and later used as a factory outlet and then office space.
- The proposed project locates housing, office, and retail uses adjacent to a rail station to encourage the use of transit. Doing so produces fewer vehicle trips than if the same project were to be located without convenient transit access.
- The proposed housing adds to the growing supply of new housing in the city. This growth has been mostly concentrated in the SoNo and Downtown areas recently so this project further diversifies the housing options for residents. It also provides 19 workforce housing units, adding to the citywide supply of affordable housing and locating it next to transit options.
- Building B is appropriately set back from the existing sidewalk on Rowan Street to create a wider, more attractive sidewalk with space for street trees that enhance the visual character of this street.
  - However, the pedestrian experience walking along the building is negatively impacted by the 4' to 6' difference between the sidewalk and the window sills (it should be noted this also provides visual privacy to ground floor units as well). Even the courtyard is elevated 5' above sidewalk level, minimizing its visual benefit to the public realm and creating a sense of separation. The height difference is likely caused by the basement parking beneath Building B. Efforts should be made to reduce this height difference and/or add more visual interest along the sidewalk (decorative panels or material changes between the piers, etc).
- Building B's brick façade, aluminum balconies, and divided lite windows reflect an industrial design character and scale similar to other buildings nearby: the adjacent former Factory Outlet building and 25 Van Zant. This helps create a cohesive aesthetic and visually distinguishes this area from other places like SoNo and Downtown Norwalk.
  - Public comment has also indicated a desire for a defined East Norwalk aesthetic to distinguish the neighborhood, perhaps nautical-influenced. Streetscape elements like light poles, banners, benches, and crosswalks can reflect this visual character.
- The proposed project provides indoor and outdoor bicycle racks to accommodate cyclists and encourage non-vehicular trips.
- The proposed project replaces a large, impervious surface parking area with new buildings, landscaping, and stormwater management systems.

The proposed project also reflects state priorities as described in both the draft "Connecticut Conservation and Development Policies Plan 2018-2023" under review now and the current version (2013-2018).

**Reference: 230 East Avenue Peer Review**

- “*Growth Management Principle #3*: Concentrate development around transportation nodes and along major transportation corridors to support the viability of transportation options.”
  - The East Norwalk Metro-North rail station and bus stops for WHEELS Routes 8 and 11 are immediately adjacent to this site. Creating a place for people to live, work, and shop here will help support these transit alternatives.
- “*State Agency Policy 2.5*: Support local efforts to develop appropriate urban infill housing and neighborhood amenities to make better use of limited urban land.”  
“*State Agency Policy 2.6*: Promote housing and/or affordable housing as part of mixed use and transit-oriented development within walking distance to public transportation facilities.”  
“*State Agency Policy 3.1*: Promote compact, pedestrian-oriented, mixed use development patterns around existing and planned public transportation centers.”
  - The proposed project site next to the train station reuses a vacant site, provides workforce housing, and creates a compact, pedestrian-oriented, mixed use development area.

### **TOD Best Practice Evaluation**

Transit-oriented development (TOD) is “a type of community development that includes a mixture of housing, office, retail and/or other amenities integrated into a walkable neighborhood and located within a half-mile of quality public transportation.”<sup>2</sup> A TOD neighborhood like East Norwalk should accommodate a range of development densities, with the highest density closest to the station tapering down toward existing neighborhoods. Pedestrian-friendly design is key to encourage people to walk between destinations, reducing the likelihood of short car trips and supporting more active, healthier lifestyles. Mixed-income housing near transit can also improve access to jobs and economic opportunity for lower income households.

The proposed project is seeking rezoning and approval in advance of the East Avenue Rail Station TOD Study. The City received a \$125,000 grant from the state in December 2017 to conduct this effort which is anticipated to begin later this year after a consultant has been selected. It will consider the broader area around the rail station, likely within a half-mile/ten-minute walking distance, to develop a vision for the currently underutilized station area. The study will investigate how to revitalize the area into a more vibrant activity center for neighbors and train users. Infrastructure possibilities and limitations will be explored as well as future land use and zoning recommendations to achieve the vision. Neighborhood-serving uses, employment opportunities, safe pedestrian and bicycle connections, and areas for greater housing density that are the foundation of successful transit-oriented development are anticipated to be part of the planning process.

The proposed project, while ahead of the TOD study, is an early opportunity to begin the process of better using the land around the station to benefit residents and train riders. The proposed zoning change affects one block of parcels bound by East Avenue, Rowan Street, Osborne Avenue, and the railroad tracks, and in the I-1 zoning district. As described below, the project generally meets widely accepted TOD best practices.

- The proposed project has a residential density of 52 units per acre (189 units on 3.62 acres) and an overall floor area ratio (FAR) of 1.75, including the existing Pooch Hotel which will remain. These densities are greater than found in the surrounding neighborhood but appropriate for this site since it is immediately adjacent to the train station. The housing density contributes to a range of different housing options within the neighborhood: multifamily apartments, fourplexes, duplexes, and single family homes.

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<sup>2</sup> Reconnecting America. “What is TOD?” <http://www.reconnectingamerica.org/what-we-do/what-is-tod/>

**Reference: 230 East Avenue Peer Review**

- Office use makes up 15% of the overall new development program (excluding the Pooch Hotel), and retail and restaurant uses are another 5% of total new development. Office and residential mixed use in one building is relatively rare. Residential/retail and office/retail are more common. For a long time, all kinds of vertical mixed-use financing has been more difficult to obtain because banks and other sources of financing preferred single-use development because they believed it to be less risky. This has been changing for residential/retail as it is now understood that the residential component helps support the retail component. While residential/office is becoming more common, it remains relatively rare and more likely to be found in areas that are denser and have more of a 24-hour urban feel. Compared to those types of projects, the proposed project is not very big, and it is difficult to assume that it would include all land uses. In fact, it now has three land uses which is not that common for a site of this size.
- Compared to other light industrial zones in the city, this location is appropriate for non-industrial use due to its direct adjacency to the rail station and nearby residential uses. Office users will provide activity during the day and residents will provide activity during the nights and weekends, all supporting local businesses and enlivening the area. The mix of uses also creates the ability to share parking between uses with different peak periods (e.g. office and housing), reducing the total parking needed compared to considering each use separately. Since the proposed project is just one site within the larger TOD area, it is an appropriate mix especially considering the proximity to transit and neighborhood retail. Future projects can introduce other job-producing uses to contribute to an overall diversity of uses in the area, not just on one site.
- The proposed project would be only one component of a broader Transit-Oriented Development zone that will be developed as part of the East Norwalk TOD study. One issue here is that the applicant wants to use the existing TOD overlay for this project alone, while the City and neighbors anticipate that TOD zoning would expand to cover a larger area as a result of the TOD study. The most important role of this project is to bring additional residential density to a train station-adjacent property, which will help expand the existing market within a walkable area for neighborhood-serving retail and services. A plan to support upgrades in the type and amount of retail and commercial development in the East Norwalk station area, as well as housing, and creating connections that allow for safe multimodal mobility within the area will be very important in the upcoming TOD plan.
- The pedestrian environment is improved by adding new buildings that replace large surface parking lots. Housing provides “eyes on the street” to improve the sense of safety for pedestrians. Retail on East Avenue contributes to the village environment and provides an amenity for commuters, residents, and office workers. A wider sidewalk along a portion of Rowan Street allows for street trees and creates a more attractive physical environment.
- Adaptively reusing the former hat factory/Factory Outlet building preserves part of the neighborhood history and its character. The building form reflects its original use, providing variety and authenticity that distinguishes this area. Reusing the building is also a sustainable choice compared to demolition as it prevents demolition materials from being sent to landfills.

Many TOD areas use creative parking approaches designed to reduce the number of cars. In addition to shared parking described above, other best practice strategies the applicant should consider include:

- “Unbundle” parking spaces: in most developments, parking is included in the cost of housing or office space whether the tenant uses it or not. In TOD areas, parking can be rented or sold separately from housing or office space. If a tenant needs parking, they can rent a space but if they do not have a car, they do not have to pay for a space they would not use. This can be particularly attractive to car-free

**Reference: 230 East Avenue Peer Review**

households. Workforce housing units, however, should have the option to include one free parking space to avoid adding another expense to the household budget.

- Car-share services: another strategy is to designate a few parking spaces for a car-share service like ZipCar. This is an amenity for residents who do not own a car but occasionally need one to get around. One shared car can meet the needs of multiple people.

**Other Issues for Consideration**

Several other items beyond POCD- or TOD-related issues were identified while reviewing the applicant's submitted drawings:

- Height and scale: the scale of Building B is similar to the adjacent Building A and to the 25 Van Zant building nearby. Building A is approximately 46' tall along Rowan Street, with a smaller top floor that is stepped back from the street edge which brings the total height to 61'. Building B is approximately 59' tall along Rowan Street. It features a courtyard facing Rowan Street that helps reduce the perceived bulk of the building along the sidewalk. Another option to consider is a top-floor step-back of the façade along the Rowan Street and Osborne Avenue edges. An 8'-10' step-back would reduce the visibility of the top floor from the street while creating a private patio for the adjacent units (see Figure 1 below). The step-back would help mitigate concerns about height and the patio would be a valuable amenity for residents.
- Building orientation: The primary entrance for Building B is in the northeast corner facing the parking area and eastbound platform at the station. The plans appear to indicate an entrance from the Rowan Street sidewalk through the courtyard (Sheets A1.01 and SPL-2.1) but no door is indicated in the architectural plans. The applicant should clarify whether an entry will exist there. Regardless, opportunities to activate the Rowan Street edge should be explored further. Potential options to consider include widening the courtyard stairs to provide a generous approach (while maintaining the trees along the edge) or creating an intermediate courtyard level above the sidewalk but below the current courtyard elevation. The intermediate level could be a shallow planted terrace to break up the monotony of the building edge (see Figure 1 below).

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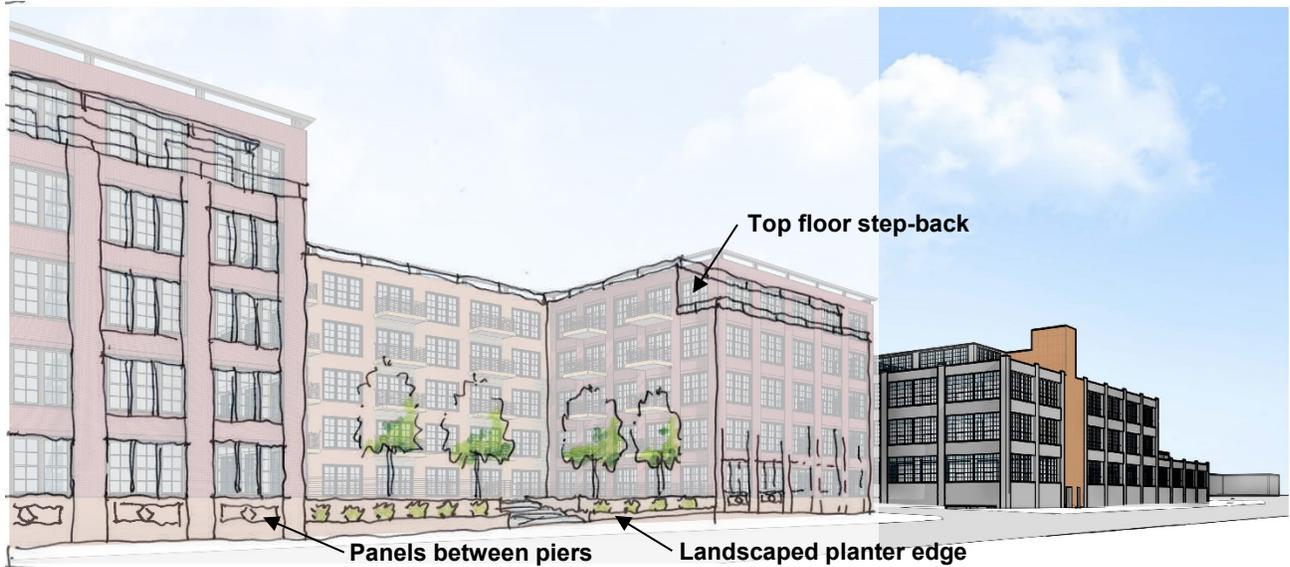


Figure 1: Potential design modifications to consider (shown over image from Sheet A9.01)

- **Materials:** Sheet A0.11 identifies the windows in Building B as aluminum divided light windows and provides a photo example. Sheet A2.03 identifies the windows in Building B as insulated vinyl windows. These are two different products and the applicant should clarify which is intended for use. If vinyl windows are planned, the detailing should reflect industrial characteristics to maintain the aesthetic. Divided lites should reflect the patterns shown in the drawings.
- **East Avenue retail setback:** the East Avenue retail building (“Building C”) is set back from the sidewalk approximately 15’-20’ with stairs leading from the sidewalk to a small plaza above sidewalk level (Sheet SPL-2.0). The topography of the street is likely causing this, but the building location and need for stairs should be revisited. Locating the building closer to the sidewalk and at sidewalk level (instead of above it) will make the retail more visible and accessible to pedestrians. It would also better reflect the village context. The existing retail buildings to the south are built to the back-of-sidewalk, approximately 15’ from the curb.
- **Site landscape:** More opportunities to add trees should be explored to soften the visual impact and add permeable surfaces. The parking lot south of the Pooch Hotel is one area where additional trees could be located. Another is the entry drive from East Avenue. Sheet A9.04 “View of Building C” shows trees and plantings along the south edge of the entry drive from East Avenue. The landscape plan (SPL-2.0 “East Avenue enlargement”) does not indicate trees or plantings in this location. Landscape here would create a more attractive entry, although required sight lines would need to be maintained. Clearly defined pedestrian paths through the parking areas would also increase the safety and pedestrian-orientation of the site.
- **Roof-top restaurant:** the roof-top restaurant proposed in Building A would likely have good views toward Norwalk Harbor that would help attract patrons. However, signage would very likely be needed to support ongoing business operations here. Signage information should be provided to verify the appropriateness for the neighborhood and effectiveness for the eventual tenant.

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- Traffic concerns and parking demand will need to be assessed separately but two items are listed below:
  - The project narrative states that the project will provide 50-60 additional commuter parking spaces (Section II.(h)). It is not clear from the information reviewed where and how these spaces will be provided. Parking calculations on Sheet SE-1 identify 270 required parking spaces after mixed-use deductions and 311 spaces provided on site (including 104 spaces in surface lots), indicating 41 available spaces. Would these be marked for commuters or first-come, first-served? What is the expected share of residents who commute via transit and how does that impact parking availability?
  - Entrances to basement-level parking are in two locations: a new ramp on Osborne Avenue for Building B and the existing ramp for Building A, accessed from the middle of Rowan Street. These locations seem suitable for the purpose, although both ramps should include signage to alert drivers to pedestrians as they exit.

### **Summary**

The proposed project will bring new life to a large, mostly vacant, and underused site directly adjacent to the Metro-North train station. It adaptively reuses a vacant building, replaces surface parking with new housing, and introduces a small retail space on East Avenue near the station. New residents and office workers will support the neighborhood retail nearby, strengthening it as a neighborhood activity node.

The proposed project aligns with emerging goals and strategies in the POCD update process. While the proposed project is ahead of the East Avenue Rail Station TOD Study which will set a comprehensive vision for the neighborhood, it reflects many TOD principles appropriate for its station-adjacent location. The proposed project is just one element of what this broader study of new design and investment opportunities to enhance East Norwalk will be. The proposed project appears to present a good opportunity to catalyze other improvements around the East Norwalk train station that will benefit both the neighborhood and the city.

**STANTEC CONSULTING SERVICES INC.**