



**CITY OF CONCORD**  
*New Hampshire's Main Street™*  
**Community Development Department**  
**Planning Division**

**Staff Report for Planning Board**

**Meeting on August 20, 2025**

**Project Summary – Amendment to Major Site Plan**

Project: The Lofts at Stickney (2022-78)  
Property Owner: Stickney Avenue LLC  
Applicant: Stickney Avenue LLC and IMEG  
Project Address: 5, 7, 9, 11, 13 Stickney Ave  
Tax Map Lot: 6442Z 12 and 6442Z 12/2

**Project Description:**

The applicant is requesting an amendment to the approval for major site plan to replace portions of granite curbing with monolithic concrete curb and sidewalk; replace portions of granite curbing with cape cod berm; and revise the previously-approved landscape plan to address comments from New Hampshire Division of Historical Resources. Applicable waivers are also requested in conjunction with the amendment requests.

**Compliance:**

The following analysis of compliance with the Zoning Ordinance and Site Plan Regulations is based on a 14-page waiver request, dated July 24, 2025, prepared by IMEG; a 1-page cover letter, dated July 24, 2025, prepared by IMEG; a 25-sheet civil set, dated 20 July 2022, with the latest revision date listed as March 14, 2025, prepared by IMEG; and a 9-sheet landscape plan, with a print date of April 11, 2025, prepared by Warrenstreet Architects, Inc.

**1. Project Details and Zoning Ordinance Compliance:**

Zoning District:	Opportunity Corridor Performance (OCP) District
Existing Use:	Abandoned garage structures
Proposed Use:	80-unit multi-family residential development
Overlay Districts:	
Flood Hazard (FH) District	None
Shoreland Protection (SP) District	None
Historic (HI) District	None
Penacook Lake Watershed (WS) District	None
Aquifer Protection (AP) District	None
Wetland:	None
Wetland Buffers:	None

**2. Comments:**

- 2.1 Per Section 6.05, proposed revisions to a major site plan that result in a major change to an approved site require a new public hearing before the Planning Board as required for a new application. The proposed revisions qualify as a major change because waivers are needed.

Specifically, Sections 16.02(22), 18.19, 18.20 all mandate adherence to the Construction Standards and Details, with Section 16.02(22) stating that “unless specifically waived by the Planning Board, construction details shall be provided which conform to the City of Concord Construction Standards and Details.” Neither the monolithic concrete curb nor the cape cod berm conforms to the Construction Standards and Details. Accordingly, an amendment and waiver approval from the Planning Board is necessary through the public hearing process.

2.2 The Planning Division provides the following:

- a. On March 15, 2023, the Planning Board granted conditional site plan and architectural design review approvals for the conversion of the existing buildings to apartments.
- b. Final plans were signed on September 19, 2024, by the Chair and Clerk of the Planning Board.
- c. Administrative approval for PL-ADM-2025-0104 was granted, with conditions, on August 6, 2025, for the replacement of portions of concrete sidewalk with bituminous sidewalk; addition of landscape berms along front and side parking lots; addition of 11 Stickney building rooftop emergency egress stairs and associated sidewalk; and addition of transformer pad. Conditions of approval are as follows: Brady Sullivan must comply with code compliance requirements for the exterior egress stairs through building permit approval; manholes shall be raised to grade to not be covered by landscaping material; the use of bituminous sidewalk is acceptable but the depicted 2-inch thickness is not allowed by the Construction Standards and Details, so waiver approval from the Planning Board is needed to proceed with the requested 2-inch thickness rather than the 3-inch thickness required by the Construction Standards and Details; and no on-site material is allowed to be placed within public right-of-way and/or City easements.
- d. Administrative approval for PL-ADM-2025-0106, submitted on July 31, 2025, was granted on August 13, 2025, for the following: changes to on-site utility mains, services, and structures due to recent City directives; revised locations of electrical services; elimination of natural gas mains and services; elimination of sidewalk and light poles to the rear of building 11.
- e. An application for administrative approval for the installed alternate pavement section has not yet been submitted. Once submitted, the request will be for administrative approval of an alternative typical pavement section to include reclaimed base material.

3. **Compliance with Site Plan Regulations:**

3.1 The Engineering Services Division reviewed the application and provided the following:

- a. Proposed sidewalk pavement thickness is 2 inches, while Construction Standards and Details require 3 inches. Engineering Services Division supports the waiver request to reduce the thickness, but **only** for sidewalk outside of the right-of-way.
- b. Proposed landscape revisions will cover existing manholes on Stickney Ave. Such manholes will need to be raised to grade.
- c. Replacement of granite curb with cape code berm is not supported because cape cod berm curbing is an inferior product compared to granite or concrete, with poor durability, inferior capability to manage stormwater run-off due to height / shape of curb and its poor durability / susceptibility to being easily damaged or destroyed particularly by snow plowing, capability, and inferior separation from pedestrian walkways which is a public safety issue.

3.2 The Planning Division reviewed the application and had no compliance comments. With the granting of the waiver requests, the amendment complies with the Zoning Ordinance and Site Plan Regulations.

**4 Variances:**

- 4.1 No variances are requested.

**5 Waivers:**

- 5.1 The applicant requests waivers from the following sections of the Site Plan Regulations:
- a. Sections 16.02(22) *Construction Details*, 18.19 *Parking Lot Design Standards Curbing and Guardrail*, and 18.20 *Parking Lot Standards Construction Standards*, to not fully comply with Construction Standards and Details, and to instead install:
    - i. Sidewalk pavement thickness of 2 inches for interior sidewalks on private property not in public right-of-way, rather than the 3 inches required.
    - ii. Concrete and/or asphalt curbing within the private parking lot not in public right-of-way, rather than the granite curbing otherwise required.
  - b. Section 27.06, to allow proposed trees to be planted farther apart than the 20-foot to 40-foot spacing otherwise required.

The applicant provided an analysis of the five waiver criteria listed in Section 36.08 of the Site Plan Regulations and the criteria in RSA 674:44(III)(e).

**Staff reviewed the evidence submitted and supports the waiver requests, noting that the Engineering Services Division does not support asphalt curbing** because cape cod berm curbing is an inferior product compared to granite or concrete, with poor durability, inferior capability to manage stormwater run-off due to height / shape of curb and its poor durability / susceptibility to being easily damaged or destroyed particularly by snow plowing, capability, and inferior separation from pedestrian walkways which is a public safety issue.

**6 Conditional Use Permits:**

- 6.1 No conditional use permits are requested.

**7 Architectural Design Review:**

- 7.1 No appearances before the Architectural Design Review Committee are necessary for this application.

**8 Conservation Commission:**

- 8.1 No appearances before the Conservation Commission are necessary for this application.

**9 Recommendations:**

- 9.1 Staff recommends that the Planning Board **adopt the findings of fact**, which include: information provided in staff reports; the applicant's submission materials; testimony provided during the public hearing; and/or, other documents or materials provided in the public hearing.

Based on the adopted findings of fact, staff recommends that the Planning Board make the motions outlined below:

- 9.2 **Grant the waiver requests below** from the listed sections of the Site Plan Regulations, based on evidence provided showing that the criteria of RSA 674:44(III)(e) and Section 36.08 of the Site Plan Regulations are met, with the condition that waivers are applicable to private property only and not public right-of-way:

- a. Sections 16.02(22), 18.19, and 18.20 to install:

- i. Sidewalk pavement thickness of 2 inches for interior sidewalks on private property
  - ii. Concrete curbing within the private parking lot (no asphalt curbing approved)
- b. Section 27.06 to allow trees to be planted farther apart than 20 to 40 feet, as depicted on the 9-sheet landscape plan, with a print date of 4/11/2025, that was submitted for the public hearing on August 20, 2025.

9.3 **Grant major site plan amendment approval** for modifications 1, 2, and 4 listed on the cover sheet, and depicted on sheets 6, 7, 17, and the landscape plans, **except that no asphalt curbing** is allowed, all as submitted for the public hearing on August 20, 2025, subject to the following precedent and subsequent conditions:

**(a) Precedent Conditions**

1. Submit two full-size paper sets of the aforementioned sheets with the signatures and seals of the appropriate licensed professionals for signature by the Planning Board Chair and Clerk (with no asphalt curbing).

**(b) Subsequent Conditions**

1. The application is subject to all previous conditions of approval for Case 2022-78.
2. The applicant is responsible for compliance with the municipal code, Site Plan Regulations, and Concord Construction Standards and Details for the project, unless a variance, waiver, or conditional use permit is granted.
3. Erosion control measures shall be installed and maintained in accordance with Section 27.09 of the Site Plan Regulations.
4. In accordance with Section 27.11 of the Site Plan Regulations, a site stabilization guarantee shall be provided to ensure that sites are properly stabilized.
5. Per Section 33.08 of the Site Plan Regulations, no certificate of occupancy or use permit may be issued prior to a determination by the Clerk that the proposed use is consistent with the Board's approval.
6. Per Section 36.15 of the Site Plan Regulations, the Clerk shall not approve any certificate of occupancy, nor shall any use of the building or site commence, unless the proposed improvements, and the proposed use of land or buildings, is found to comply with the approved site plan and the conditions of Planning Board approval.
7. Per Section 36.19 of the Site Plan Regulations, it shall be the duty of the Clerk to enforce the regulations and to bring any violations or lack of compliance herewith, to the attention of the City Solicitor.
8. Per Section 36.24 of the Site Plan Regulations, no certificate of occupancy or other use permit shall be issued until the development has been completed according to the approved plans.
9. Per Section 36.25 and Section 12.09 of the Site Plan Regulations, and **prior to the issuance of a certificate of occupancy, the applicant's engineer or surveyor shall submit to the City Engineer a detailed "as-built" survey showing the location of buildings, structures, utilities, parking areas, driveways and access, as well as for any public improvement constructed indicating location, dimensions, materials, and other information required by the City Engineer. The as-built survey shall also be submitted in digital format and media conforming to the Engineering Services Division's as-built checklist.**