

George Latimer
County Executive

December 19, 2022

Adam R. Kaufman, Director of Planning
Town of North Castle
15 Bedford Road
Armonk, NY 10504

**County Planning Board Referral File NOC 22-016 – Eagle Ridge, 3 North Castle Drive
Site Plan Approval**

Dear Mr. Kaufman:

The Westchester County Planning Board has received a site plan (revised October 18, 2022) for the redevelopment of a property located at 3 North Castle Drive (SBL 108.03-1-62.1). The 32.5-acre site is currently forested, and is zoned OBH – Office Business Hotel with the RMF-SCH – Multifamily – Senior Citizen Housing district recently overlaid on a section of the site. This 21.8-acre section would be subdivided, and is proposed to contain 72 age-restricted senior townhouse units. The remaining 10.6-acre lot would be developed with a four story, 124-room hotel. The entire subject site was previously associated with the IBM North Castle campus to the south, for which North Castle Drive serves as the entrance, and is located directly west of the North Castle Community Park. Armonk Bedford Road (NYS Route 22) separates the site from downtown Armonk to the north.

The hotel lot would include a restaurant and outdoor dining area, bar, and a pool. 201 parking spaces are proposed within a parking lot that surrounds the building, and is accessed by a separate driveway from North Castle Drive. Two retention basins are proposed for stormwater management.

The townhouse lot would include a pool for residents as well as a pool house, with an eleven space parking lot serving the building. Each townhouse would contain two-bedrooms, though the floorplans show the units would also include a bonus room/office. Eight of the units are proposed to be set as affordable affirmatively furthering fair housing (AFFH) units. Each unit would include a two-car garage accessed by individual driveways, though the townhouses would be paired in groups of two. A new street network would connect the townhouses through one loop road and one dead-end road, leading to a new entrance onto North Castle Drive. A retention basin is proposed for stormwater management.

The application has been ongoing since 2018, with our last review conducted in response to the final environmental impact statement (FEIS). Since that time the development proposal has been substantially changed with the removal of a condominium building that would have shared the hotel site. This building was originally proposed to contain 59 multi-family units, of which eleven would have been affordable AFFH units. As a result, the applicant has increased the proposed number of townhouses restricted to seniors from 50 to 72. In addition, a previously proposed network of pedestrian pathways, gardens, and art installations is no longer shown on the plans.

We have previously reviewed this matter under the provisions of Section 239 L, M and N of the General Municipal Law and Section 277.61 of the County Administrative Code and we responded to the Town in letters dated April 11, 2018 (in response to Lead Agency), June 8, 2018 (in response to the draft EIS scope),

June 28, 2019 (in response to the DEIS), and January 4, 2021 (in response to the FEIS). As the site plans have changed from the FEIS, we offer the following comments:

1. Need for wider range of housing types.

While the proposed development has always considered senior housing as a substantial component, the most recent changes to the plans have increased the number of housing units restricted to seniors at the expense of multi-family condominium units that would have been available to a wider range of housing types. We do not agree with homogenizing the proposed housing options for seniors on this site in light of the critical shortage of housing that is documented in the County's *Housing Needs Assessment*.

We note that the proposed townhouses are very large, each with two bedrooms and a bonus room/office that could easily be converted into a third bedroom. This suggests that permitting families to occupy these units would be appropriate, since townhouse-style development is often sought by families in Westchester. Also, the site's location between the IBM campus and downtown Armonk would likely make this site desirable for IBM employees who want to live near work. If a condominium building can no longer be considered for the site, we recommend that the townhouse units be made available for families, with no age restrictions. We point out that there is no prohibition on seniors living in developments that are not age-restricted.

2. Affordable affirmatively furthering fair housing.

Given the proposed development changes referenced above, the application now includes fewer affordable AFFH units than was previously proposed (though still 10%), and the development would now only offer affordable AFFH units to seniors. As previously stated, we disagree with the need for these units to be age-restricted and we urge the Town to work with the applicant to make those units available to a wider range of households.

3. Pedestrian connectivity.

The County Planning Board's long-range planning policies set forth in *Westchester 2025—Context for County and Municipal Planning and Policies to Guide County Planning*, adopted by the Board on May 6, 2008, amended January 5, 2010, and its recommended strategies set forth in *Patterns for Westchester: The Land and the People*, adopted December 5, 1995, call for the channeling of development to existing downtown centers that are designed to facilitate or enhance a smart growth fabric. As the subject site lies just outside of downtown Armonk, creating a safe pedestrian connection to the hamlet center will be critical in achieving this goal.

Under prior reviews, pedestrian access to the site was to be provided via a proposed sidewalk along North Castle Drive between the site driveway and Route 22, and a crosswalk across Route 22. A walking path was also proposed to connect the site to the neighboring Community Park, as well as interior walking paths and sidewalks connecting the various buildings. The current site plan no longer proposes these facilities, severely limiting the options for people seeking to access the hotel and residential site as pedestrians or transit riders. As pedestrian accommodations have gradually receded under each new iteration of this proposal, we are now very concerned that this development will be isolated from the Armonk hamlet and Community Park as a result. We urge the Town to continue to work with the applicant as well as NYSDOT to find a solution to for safe pedestrian access within the property and between the development site, the hamlet and the park. We have noted that since start of the pandemic, there has been a marked increase in residents utilizing walking trails.

As a general matter, we continue to be concerned about the Town changing land uses or adding to density on the opposite side of Route 22 from downtown Armonk. As we have pointed out several times, there is a serious, potentially dangerous deficiency for pedestrians and other lawful, non-motorized road users who must navigate across Route 22 and into the Armonk hamlet without sidewalks or crosswalks. If this site is to be developed with residential and hotel uses, there must also be an effort made to improve pedestrian and bicycle access to the Armonk hamlet for the people who will inevitably walk in this area. In addition, we continue to urge the Town to consider the increased number of vehicular crashes that have occurred at the intersections along Route 22 in the Armonk hamlet before potentially exacerbating this situation by adding more vehicles, pedestrians and bicycles to this area.

4. Recycling provisions.

The Town should require the applicant to verify that sufficient storage measures are provided to accommodate the expanded County recycling program. County regulations for recycling may be found at <http://environment.westchestergov.com>.

We also recommend consideration of on-site food composting or composting storage for any on-site food service operations. Food composting would not only reduce the burden of food waste in the waste stream, but it would also provide a resource for the maintenance of on-site landscaping.

5. Green building technology and bicycle parking.


While there was a discussion to install green roofing and other sustainable measures in the FEIS, we note that there is no indication of either green roofing or solar arrays to be installed on the roof of the proposed hotel. As the hotel would contain a large flat roof, we recommend the applicant consider installing a solar array on the roof of the building.

We also note there are no bicycle amenities, such as storage rooms or outdoor racks, indicated on the plans despite the suggestion in the FEIS to determine appropriate locations for these items. We recommend that the site plan include bicycle facilities for residents, visitors, and employees.

Please inform us of the Town's decision so that we can make it a part of the record.

Thank you for calling this matter to our attention.

Respectfully,
WESTCHESTER COUNTY PLANNING BOARD

By: 

Norma V. Drummond
Commissioner

NVD/MV

cc: Lance MacMillan, Regional Director, NYS DOT Region 8
Anne Darelius, NYS DOT Region 8
Christopher Lee, NYS DOT Region 8