

Letter of Response

May 26, 2026
Via Electronic Mail

Planning and Economic Development Board
Town of Medway
155 Village Street
Medway, MA 02053

Attention: Barbara J. Saint Andre | Director, Community and Economic Development

**RE: Response to Comments Letter
117 Main Street
Medway, MA 02053
Bohler Project #MAA240482.00**

Dear Barbara J. Saint Andre:

On behalf of the applicant, Route 85 Realty Corp., please allow this letter to serve as our formal response to your letter dated May 13, 2026 regarding the Heritage on Main Street Application, prepared by the Town of Medway – Community and Economic Development Department for the above mentioned project. For your reference, the comments provided by Medway's Planning and Economic Development Board ('PEDB') are shown in standard font type and the applicant team's responses are shown in bold font type. Three figures as noted in the responses are enclosed as a part of the responses for reference.

Zoning Bylaw

1. Special Permit criteria – This development requires a mixed-use development special permit under Section 10.3 of the Zoning Bylaw, as well as a number of other special permits. Special permits under Section 10.3 are not subject to the usual special permit criteria of Section 3.4; the criteria for granting special permits is found in Section 10.3.E. The Board should keep these criteria in mind when reviewing the special permit applications. In addition, some of the special permits applied for have other, specific criteria that the Board should be aware of; these are discussed below.

Response:
Comment acknowledged.

2. ANR Plan – The site includes a number of contiguous lots, which are being proposed to be developed as one project. The plans show the intent to submit a plan under G.L. c.41, §81P as not requiring approval under the Subdivision Control Law (ANR). As shown on sheet C-303, the ANR would combine the various existing lots into two lots, one lot with the residential building, and one lot with the commercial uses. The applicant has stated that it will submit an ANR after PEDB approval. I recommend that the Board impose as a condition of any approval that an ANR plan reflecting the proposed reconfiguration of the lots be submitted to the Board within a specified time frame, specifically, prior to endorsement of the final plans.

Response:
Comment acknowledged.

3. Section 10.2.B – This development is in the Main Street Pedestrian Frontage Zone. The proposed buildings, except for the residential building, are subject to the provisions of Section 10.2.B. The proposed bank, restaurant, and convenience store buildings appear to comply with these requirements.

Response:
Comment acknowledged.

4. Section 10.2.C Building Height – The proposed buildings are subject to Table 9.3.B.6 with respect to maximum height, which increases as setback increases. It appears from the plans that the residential building is set back at least 22.5 feet from the street, which would allow a maximum height of 50 feet under Table 9.3.B.6. Building height is defined as the vertical distance from grade plane to the average height of the highest roof surface. In addition to the requirements of Table 9.3.B.6, there are also maximum heights for each building type set forth in the Tables under Section 9.4.C. All of the proposed buildings appear to be compliant as to height.

Response:
Comment acknowledged.

5. Section 10.2.D Parking –

- A. The parking calculations need to be clarified. In its narrative letter to the Board, based on Table 3 for off-street parking, the applicant indicates a required number of parking spaces of 481, which appears to be the correct number. However, the parking calculations shown on the plans, sheet C-301, indicate the required number of parking spaces is 486. The discrepancy between the two calculations is the number of spaces for the bank, which should be 7 but is listed as 12 on sheet C-301. Also, the chart on sheet C-301 mixes up the parking requirements for the bank, which is 7, and the restaurant/retail, which is 35, this should be corrected.

Response: The parking counts and appropriate tables have been updated and verified. The project will be required to provide 481 parking spaces and breakdown will be provided on revised plans.

- B. Since the applicant proposes to provide 504 parking spaces according to sheet C-301, 512 parking spaces according to the Transportation Impact Assessment, and 527 spaces according to the cover letter, this will require PEDB waiver under Section 10.2.D.2. The applicant should clarify how many parking spaces are provided, and whether that includes the spaces in the garages.

Response: The project will request a waiver for the parking requirement. Currently, 504 parking spaces are proposed for the project site.

- C. The applicant needs to comply with the provisions of Section 7.1.1, unless otherwise provided in Section 10. Under Section 7.1.1.E.1.4, 2% of the parking spaces must have electric vehicle charging stations, which means that 10 EV parking spaces are required for this site. According to the chart on C-301, only 7 are provided. According to the TIA, there will be 11, this should be clarified. Also, there is a handicapped space located next to the dumpster in the back of the site, is that typical?

Response: Comment acknowledged. The applicant team is studying the EV arrangement and quantity and intends to provide adequate EV charging in compliance with both Section 7.1.1 and the Building Code. A revised site plan will be provided with requisite number of EV chargers.

- D. The Zoning Bylaw provides that off-street parking is to be located to the side or rear of buildings. The applicant has applied for a special permit under Section 10.2.D.2.c:

As an exception to Section 7.1.1.G., all off-street parking shall be located behind or beside buildings located in the Pedestrian Frontage Zone and within sixty feet of the Main Street right-of-way line. Vehicular parking between the front building line and the street right-of-way line is permitted only if the Planning and Economic Development Board grants a special permit and the applicant can demonstrate that no other reasonable alternative exists.

Buildings B and C have parking spaces between the buildings and the front of the lot, and proposed parking lot 1 has parking spaces between the front building line and the street right-of-way. The applicant needs to demonstrate that no other reasonable alternative exists for the parking that is between the front building line and the street right-of-way line.

Response:

Parking spaces are located in front of Buildings B and C as it provides a practical and marketable arrangement for the retail uses. Front-loaded parking improves visibility, convenience, and accessibility for prospective retail tenants and their customers, which supports tenant demand and long-term commercial viability. Additionally, the applicant notes that the proposed (9) parking spaces facing Main Street immediately adjacent to the residential building are approximately 4-6-ft lower in elevation than Main Street. A wall and landscaping buffering will provide visual and physical buffer to the lower parking spaces from the street.

Further, the site layout is constrained by the proposed drive-through(s) and associated circulation patterns, which limit the feasibility of locating all parking to the rear of these buildings while still maintaining efficient traffic flow, functional building placement, and meeting the required parking demand. As such, locating a portion of the parking in front of the retail buildings represents a reasonable and feasible site design solution. In addition, the applicant's agreement to donate to the Town a large portion of the rear area of the project site creates additional site design and layout constraints.

- E. Section 10.2.D.2.b.2 – The applicant has requested a “waiver” of the following:

In parking areas with more than seventy-five spaces, the expanse of pavement shall be interrupted by separating rows of parking spaces from each other with a combined planting strip and sidewalk at least eight feet in width. Design of these planting strips/sidewalks shall take into account the need to store snow, locate light poles, install deciduous trees, and allow safe pedestrian movement.

Proposed parking area 1 appears to be the only parking area with more than 75 spaces. There is no provision for a waiver of this requirement, a variance from the ZBA is required.

Response:

The applicant acknowledges this comment. The waiver was requested in an abundance of caution, because the term “parking area” is undefined in the Zoning Bylaw. However, it is the applicant's position that no distinct parking area in the proposed project contains more than 75 parking spaces. A Parking Area Delineation Plan, showing the number of spaces in each parking area, is enclosed for the Board's reference. In addition, the project has been generally laid out to provide generous landscape areas throughout the site in order to break up the overall parking field, reduce the visual expanse of pavement, and create a more attractive and functional site design. Accordingly, the applicant withdraws this request as unnecessary.

6. Section 7.1.1.I – Bicycle parking facilities must be provided, ratio of one bicycle space per 20 parking spaces. They do not appear to be shown on the site plan. The PEDB can grant a waiver of the minimum required number based on site conditions.

Response:

The site plans will be updated to provide exterior bicycle parking spaces at a ratio of one space per 20 parking spaces.

7. Section 10.2.E Street Scape – The applicant needs to demonstrate compliance with this Section. The applicant has requested a “waiver” of Section 2.a. However, Section 2.a provides that a concrete walkway may be installed, it is not mandatory, so it is not clear that a waiver is required based on the site plan.

Response:

As noted a waiver is not required as the concrete walkway is not mandatory. The site design will rebuild in kind and supplement the existing sidewalk with additional seating areas and landscape and tree buffer as detailed on the plans. Accordingly, the applicant withdraws this request as unnecessary.

8. Amenity spaces: Under Section 10.2.F, at least 15% of the lot or development site shall be dedicated to Outdoor Amenity Space. The applicant needs to demonstrate compliance with this requirement, as there does not appear to be any calculation provided as to the percentage of Outdoor Amenity Space. Section 10.2.F lists specific types of Outdoor Amenities that qualify toward the 15%. In addition, the applicant has applied for a special permit under Section 10.2.F.4, which allows the Board to allow other types of Outdoor Amenities by special permit.

Response:

The project intends to comply with the 15% amenity space requirement for the “development site” as defined as limit of disturbance on Lot 1 (the Residential lot). A Outdoor Amenity Space exhibit, showing the approximate breakdown of outdoor amenity spaces on the “development site”, is enclosed for the Board’s reference.

9. Gas Station – The existing gas station is proposed to be redeveloped under Section 10.2.A, which requires a special permit. The proposed gas station and convenience store must meet the standards set forth in Table 9.4.C.1.B, as recently amended by Town Meeting.

Response:

The applicant believes that this comment has been rendered moot by the recent Town Meeting vote to eliminate the referenced requirements.

10. Section 10.3.C.2 – Setbacks – The applicant has requested a waiver of Section 10.2.E.3, however, that Section is not applicable to this proposed mixed-use development. Instead, Section 10.3.C.2 applies:

Notwithstanding the provisions of Section 10.2.E.3, there shall be a minimum setback of 25 feet from all side and rear lot lines abutting a residential zoning district, of which the first ten feet nearest each lot line shall not be used for the parking or storage of vehicles and shall be suitably landscaped. There is no side-yard or rear-yard setback for properties abutting other properties within the Central Business district.

The site plan appears to comply with this requirement, although it would be helpful to show the ten foot setback from the lot line abutting 5 Elm Street, which is zoned AR-II.

Response:

Acknowledged. A 10-ft setback line along 5 Elm Street will be added to the revised site plans.

11. Section 10.3.D.5 – This Section requires at least 2,000 square feet of commercial development for every 50 residential units, or fraction thereof. With 267 residential units proposed, this requires a minimum of 12,000 square feet of commercial development. The application and site plan show compliance with this requirement.

Response:

Acknowledged, no response required.

12. Affordable housing units: Section 10.3.D.6, and Sections 8.6.B and 8.6.C require that 20% of the units be affordable units in compliance with Section 8.6 of the Zoning Bylaw. With 267 units proposed, 20% would be 53.4 affordable units. The number of units required would be 53, with a payment for the fraction of a unit in accordance with Section 8.6.C.2.

The applicant has applied for a special permit under Section 10.3.D.6 to lower the percentage of affordable units to 10%. That Section provides in pertinent part:

The Planning and Economic Development Board may by special permit provide for a lower percentage of affordable units than required by Section 8.6, but in no event less than 10%, if the Planning and Economic Development Board finds that the special permit would be in the best interests of the Town; provides additional design or other community benefits beyond the minimum requirements of the zoning bylaw or the proposal integrates street-facing, ground floor non-residential uses along Main Street; and is consistent with the purposes of the Central Business District. The Decision Criteria in Section 3.4.C do not apply to special permit applications under this Section.

The applicant should provide justification for the request in accordance with the standards of Section 10.3.D.6. If the Board grants the request to set the percentage of affordable units at 10%, that would require 26.7 affordable units. Because the fractional unit is more than .5, the number would be rounded up to 27 units. See Section 8.6.C.

The affordable units must be established in compliance with Section 8.6 and will require, among other things, that the applicant prepare an Affirmative Fair Housing Marketing Plan, a Regulatory Agreement, and a Deed Rider in compliance with Local Initiative Plan guidelines. The applicant should begin this process at an early stage, as it can be time-consuming and requires approvals from the Town and the Executive Office of Housing and Livable Communities as Local Action Units. Many developers use a consultant to perform these tasks; it is wise to make arrangements for such a consultant well in advance.

Response:

The applicant is making significant financial contributions to the Town, in addition to all required permit and connection fees. The applicant is also donating approximately 5.7 acres of land that had previously been included in the applicant's development plans. The financial impact of these concessions is such that the economics of the project simply do not support reserving 15% of the remaining units as inclusionary. The Development Agreement between the applicant and the Town specifically contemplates this waiver request.

13. Section 10.5 – The entrance located to the west of the residential building appears to comply with Section 10.5.A. It is not clear if the entrance located to the east of proposed parking lot 1 complies. The applicant needs to demonstrate compliance with this Section.

Response:

The proposed entrance towards the middle of the project site is 24-ft wide, provides two travel lanes, and a sidewalk for access to the site. The access drive is similar to the western

access drive and believe in compliance with section 10.5.A. Additionally, the drive complies with Section 7.11 Driveways/Curb Cuts of the Subdivision Regs.

Site Plan

1. Dumpsters: Section 207-17 of the Site Plan Regulations requires that dumpsters be fully screened on all sides and to the full height of the dumpster, and shall be large enough to accommodate both trash and recycling containers. There is no detail showing the dumpster enclosures and whether they comply with these requirements.

Response:

A detail showing compliant screening will be added to the site plans.

2. The applicant needs to provide a calculation of the trees being removed that fall within Section 207-19.F-G of the Site Plan Rules and Regulations, and proposed mitigation.

Response:

The applicant acknowledges and is finalizing study of the tree removal on site and preliminary graphic and calculation is enclosed for the Board's reference. As there are a number of trees that overlap within the three tree ordinances applicable to the project, the applicant looks forward to continuing to work with the appropriate staff and boards on the final required mitigation.

3. Site plan cover sheet – The owner information for 115 Main Street should be changed to Rte. 85 Realty Group.

The Approval Block should read: "Approved by the Town of Medway Planning and Economic Development Board. Approval date _____ Endorsement date _____". There should be five signature lines.

There needs to be a Town Clerk signature space, "I certify that 20 days have elapsed since the Planning and Economic Development Board approval was filed with this office and no appeal has been filed in this office. Date _____" There should be one signature line
"_____ Town Clerk, Town of Medway"

There should be an area provided to add a list of any waivers granted.

Response:

- (1) **The owner information will be updated.**
- (2) **The approval block will updated.**
- (3) **The Town Clerk signature space will be added.**
- (4) **An area for a list of final waivers will be added.**

4. There needs to be a signature block on each sheet for the Planning and Economic Development Board. Signature block for the Town Clerk is not required on any page other than the cover sheet.

Response:

The appropriate signature block will be added.

Other:

1. Section 7.1.2 – The applicant needs to demonstrate compliance with the outdoor lighting standards.

Response:

A summary of compliance with 7.1.2 is provided on the lighting sheets.

2. Section 7.2 Signs – Signage will need to comply with this section.

Response:

It is anticipated a separate signage package will be prepared and submitted for Sign Permit review in compliance with Section 7.2 prior to issuance of Building Permit.

3. It is my understanding that the residential units are to be rental units, please confirm.

Response:

Confirmed, the proposed residential units are intended to be rental units.

4. Transportation Impact Assessment – Two questions for the applicant's traffic expert to hopefully clarify. Page 11 states that the proposed municipal complex to be located across Main Street is captured in the background growth, how was this determined? Secondly, the trip distribution schematics following page 16, how was the distribution determined?

Response:

The municipal complex was included in the background growth rate which added approximately 100 trips to the Main Street corridor. Two trip distributions were developed for the project, with the residential distribution based on Journey to Work data and the retail distribution based on existing traffic patterns on Main Street.

5. Structure Demolition Bylaw: ~~Article 27~~ Article 17 of the Town's General Bylaws governs the demolition of structures that are at least 75 years old. Applications for demolition of any such structures will need to be reviewed by the Historical Commission.

Response:

Acknowledged, the following buildings were built 75 years ago (older than 1951) per property record cards and will be submitted for review by the Historical Commission prior to demolition:

- (1) 117 Main St - Auto Sales building, built 1920**
- (2) 113 Main St – Office building, built 1940**

6. Tree Preservation Bylaw: It appears that the applicant will be removing trees in the zoning setback areas, this requires a permit under Article 31 of the Town's General Bylaws, Tree Preservation from the Conservation Agent.

Response:

The Tree Preservation permit to be obtained from the Conservation Commission prior to construction.

7. This development will require an Order of Conditions and a Land Disturbance Permit (General Bylaws Section 26) from the Conservation Commission.

Response:

A NOI and Land Disturbance Permit application has been submitted to the Conservation Commission and MassDEP.

8. This development will require permits from the DPW, the applicant should consult with DPW.

Response:

Acknowledged, the project will obtain the appropriate permits prior to construction.

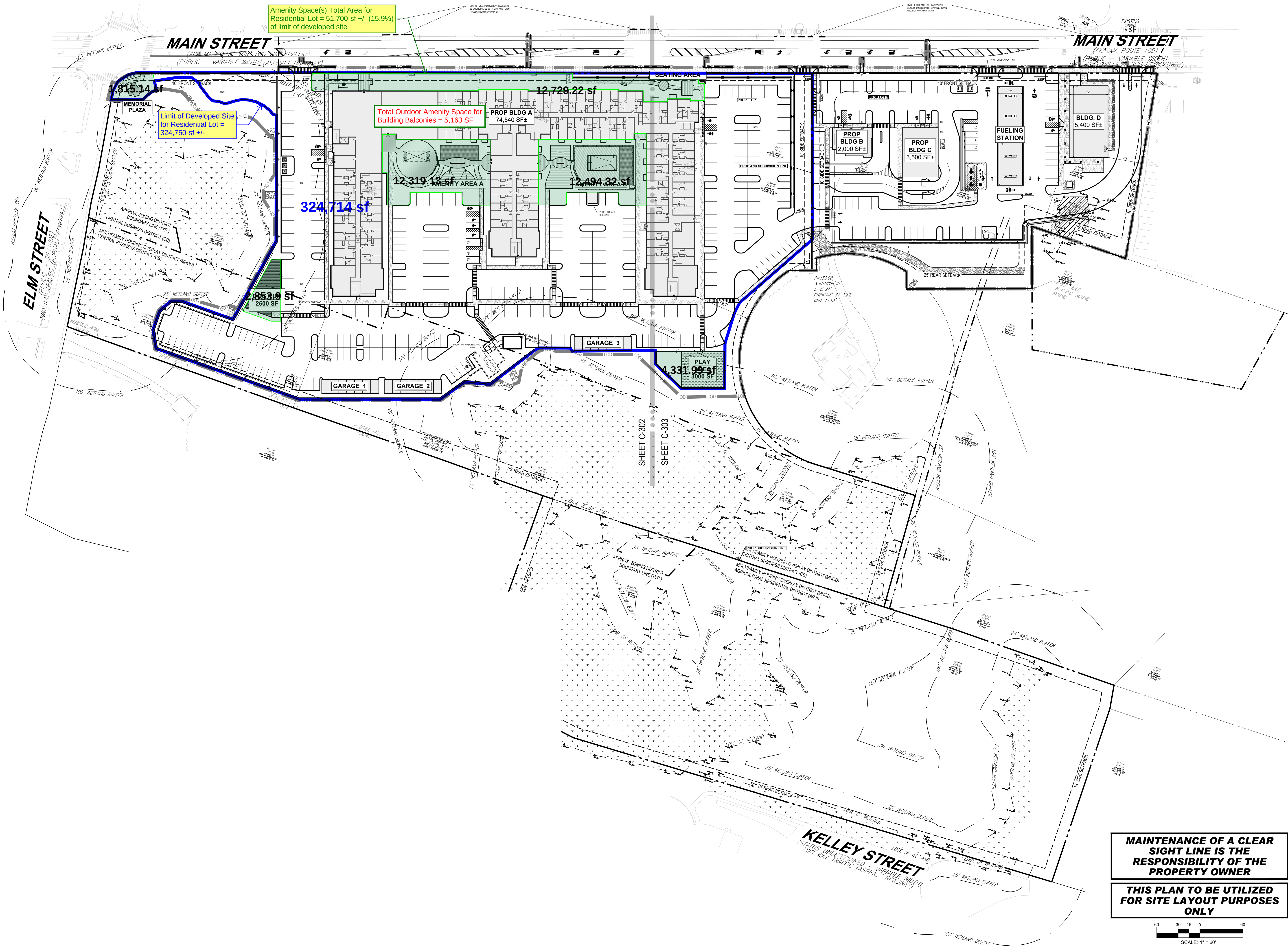
Upon your review of the above, please do not hesitate to contact me directly with any questions.

Sincerely,

BOHLER ENGINEERING MA, LLC



Timothy Hayes, P.E.



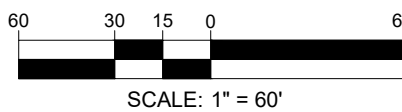
Amenity Space(s) Total Area for Residential Lot = 51,700-sf +/- (15.9%) of limit of developed site

Limit of Developed Site for Residential Lot = 324,750-sf +/-

Total Outdoor Amenity Space for Building Balconies = 5,163 SF

MAINTENANCE OF A CLEAR SIGHT LINE IS THE RESPONSIBILITY OF THE PROPERTY OWNER

THIS PLAN TO BE UTILIZED FOR SITE LAYOUT PURPOSES ONLY



BOHLER

SITE CIVIL AND CONSULTING ENGINEERING
LANDSCAPE ARCHITECTURE
PROGRAM MANAGEMENT
SUSTAINABLE DESIGN
PERMITTING SERVICES
TRANSPORTATION SERVICES

REVISIONS				
REV	DATE	COMMENT	DRAWN BY / CHECKED BY	

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PROJECT No.: MAA240482-00-1D
DRAWN BY: AP, JK, SW
CHECKED BY: TH, MM
DATE: 02/02/2026
CAD ID: P-CIVIL-PROP

PROJECT:

HERITAGE ON MAIN

FOR

RTE. 85
REALTY CORP
P.O. BOX 2440

PROPOSED
MIXED-USE DEVELOPMENT
107-119 MAIN ST, 1 & 3 ELM ST,
0 & 26 KELLEY ST,
NORFOLK COUNTY,
TOWN OF MEDWAY,
MASSACHUSETTS

BOHLER

352 TURNPIKE ROAD, 3rd FLOOR
SOUTHBOROUGH, MA 01772
Phone: (508) 480-9900
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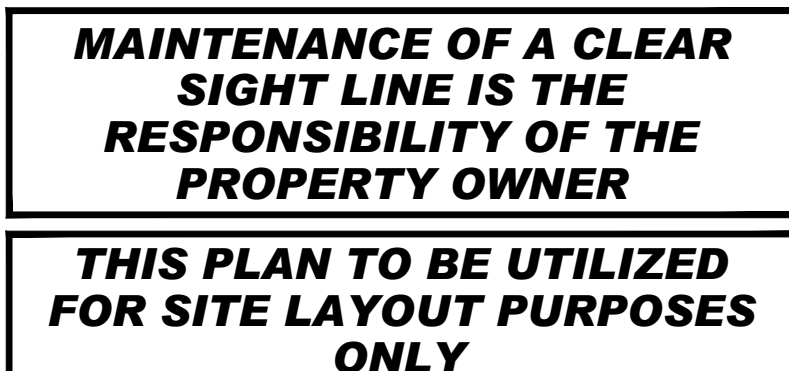
OUTDOOR AMENITY AREA EXHIBIT
5/20/2026

SHEET TITLE:
OVERALL SITE PLAN

SHEET NUMBER:
C-301

ORG. DATE - 04/15/2026

\\BOHLER\ENG\NET\PROJECTS\MAA240482-00\CADD\DRAWINGS\PLAN SETS\CIVIL SITE PLAN\PROP-CIVIL-PROP-MAA240482-00-1D-3-LAYOUT: C-301 SITE



DEVELOPMENT SUMMARY TABLE										
Key	Description	Building Footprint	Floors	GSF Residential	Units	GSF Retail	Unit Size	Parking Ratio Required by Zoning	Parking Spaces Required by Zoning	Parking Provided
A	Residential - Apartments (Parking below)	74,540	4	298,160	267		1,117	1.5 per unit	401	86
B	Bank	2,000	1	-	-	2,000	-	1/300 SF	7	
C	Restaurant*	3,500	1	-	-	3,500	-	1 space for each employee and 1 space for every 3 seats	35	
D	Convenience Store	5,400	1	-	-	5,400	-	1/300 SF	18	
E	Fueling Station (w/ 20 fueling positions)		1	-	-	-	-	1 space / fueling position	20	
TOTAL		85,440		298,160	267	10,900			481	504
Accessible spaces								2% of total	10	15
EV charging stations Parking spaces								2% of total		10

NOTES:
 * RESTAURANT ASSUMES 75 SEATS AND 10 EMPLOYEES.
 (1) 15 ACCESSIBLE SPACES PROPOSED. 10 ACCESSIBLE SPACES REQUIRED (MIN. 2% OF TOTAL PROPOSED SPACES TO BE ACCESSIBLE SPACES WHEN 501-1000 SPACES ARE PROPOSED). 1 ACCESSIBLE VAN SPACE PER 6 STANDARD ACCESSIBLE SPACES (MIN.).



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DRAWN BY: AP, JK, SW
CHECKED BY: TH, MM
DATE: 02/02/2026
CAD I.D.: P-CIVL-PROP

PROJECT:

_____ FOR _____

— FOR

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REALTY CORP
P.O. BOX 2440

**PROPOSED
MIXED-USE DEVELOPMENT**

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0 & 26 KELLEY ST,
NORFOLK COUNTY,
TOWN OF MEDWAY,
MASSACHUSETTS**

BOHLER //

**352 TURNPIKE ROAD, 3rd FLOOR
SOUTHBOROUGH, MA 01772**
Phone: (508) 480-9900

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PARKING

5/20/2026

SHEET TITLE:

OVERALL SITE PLAN

SHEET NUMBER:

C-301

ORG. DATE - 04/15/2026

