



CITY OF CAMBRIDGE, MASSACHUSETTS

PLANNING BOARD

CITY HALL ANNEX, 344 BROADWAY, CAMBRIDGE, MA 02139

2015 JUN 17 AM 8 52

NOTICE OF DECISION

OFFICE OF THE CITY CLERK
CAMBRIDGE, MASSACHUSETTS

Case Number:	295
Address:	305 Webster Avenue
Zoning:	Business A
Owner and Applicant:	M&H Realty Trust c/o Sean Hope, Esq. P.O. Box 410189, Cambridge, MA
Application Date:	March 3, 2015
Date of Planning Board Public Hearing:	March 31, 2015
Date of Planning Board Decision:	May 26, 2015
Date of Filing Planning Board Decision:	June 17, 2015

Application: Conversion of existing non-conforming building, with a conforming addition, to residential use with thirty-five (35) dwelling units and ground floor commercial space. Seeking Project Review Special Permit (Section 19.20) and dimensional relief for Conversion of Non-Residential Structure to Residential Use (Section 5.28.2).

Decision: GRANTED, with Conditions.

Appeals, if any, shall be made pursuant to Section 17 of Massachusetts General Laws, Chapter 40A, and shall be filed within twenty (20) days after filing of the above referenced decision with the City Clerk. Copies of the complete decision and final plans, if applicable, are on file with the Community Development Department and the City Clerk.

Authorized Representative of the Planning Board: Jeffrey C. Roberts JCR 6/17/15

For further information concerning this decision, please contact Liza Paden at 617-349-4647, or lpaden@cambridgema.gov.

DOCUMENTS SUBMITTED

Application Documents and Supporting Material

1. Special Permit application submitted March 3, 2015, containing the Special Permit Cover Sheet, Ownership Certificate, Dimensional Form, Narrative, receipt of plans, and Tree Mitigation plan dated 12/2/14 by Blair Hines Design Associates, and attached graphic materials dated 2/01/15 including cover sheet, site plan, area plans, garage plan, floor plans for floors 1-4, roof plan, elevations, perspectives, zoning plans, zoning perspective, site context.
2. Revised materials submitted May 13, 2015 including cover memo dated 5/13/15 and attached graphic materials dated 5/12/15.
3. Revised Dimensional Form received 5/26/15.

Other Documents

4. Memo to the Planning Board from Community Development Department staff dated 3/25/15.
5. Memo to the Planning Board from Katherine F. Watkins, PE, City Engineer, dated 3/17/15.
6. Memo to the Planning Board from Charles Sullivan, Executive Director of the Cambridge Historical Commission, dated 3/20/15.
7. Letter to the Planning Board from Maggie Booz, et al, Committee for Public Planting, dated 3/26/15.
8. Letter to the Planning Board from Michael Grill, Chairman for 432 Columbia Street Condominium Trust, dated 3/30/15.
9. Email to the Planning Board from John Sanzone, dated 3/31/15.
10. Letter to the Planning Board from Patrick Magee, Atwood's Tavern, East Cambridge Business Association dated 3/31/15.
11. Email to CDD staff from Kara Falise, Department of Public Works, and clarification of sidewalk standards for new tree plantings, dated 4/21/15.
12. Memo to the Planning Board from Community Development Department staff dated 5/19/15, with attached Draft Planning Board Decision document.

SUMMARY OF APPLICATION

305 Webster Ave is a triangular lot situated at the corner of Webster Avenue and Columbia Street and just north of Cambridge Street. The city boundary with Somerville is a short distance to the north. The lot contains an existing one-story commercial building with full basement and partial second-story space, which has been used for various commercial operations over time and was most recently used as an auto parts store. The proposal is to retain the existing non-conforming structure and construct a new addition above the existing structure that would conform to the dimensional requirements for residential uses in the district. The result would be a residential building with a total height of four stories containing 35 dwelling units and other residential amenities. Accessory parking and bicycle parking would be located in the existing basement space and accessed from Columbia Street. A small commercial space would be created at the ground floor with an adjacent outdoor landscaped plaza at the acute corner of the lot closest to Cambridge Street.

FINDINGS

After review of the Application Documents and other documents submitted to the Planning Board, testimony given at the public hearing, and review and consideration of the applicable requirements and criteria set forth in the Zoning Ordinance with regard to the relief being sought, the Planning Board makes the following Findings:

1. Project Review Special Permit (Section 19.20)

The project requires a Project Review Special Permit by exceeding the threshold of twenty thousand (20,000) square feet of Gross Floor Area applicable in the Business A district. However, the project does not exceed the fifty thousand (50,000) square-foot threshold that would require a Traffic Study. Therefore, only the urban design component of the Project Review Special Permit is applicable to this project. In considering the standards for issuance of a special permit, the Board is guided by the provisions of Section 19.25.2 and the Citywide Urban Design Objectives set forth in Section 19.30.

(19.25.2) Urban Design Findings. The Planning Board shall grant the special permit only if it finds that the project is consistent with the urban design objectives of the city as set forth in Section 19.30. In making that determination the Board may be guided by or make reference to urban design guidelines or planning reports that may have been developed for specific areas of the city and shall apply the standards herein contained in a reasonable manner to nonprofit religious and educational organizations in light of the special circumstances applicable to nonprofit religious and educational activities.

The Board finds that the proposed project is consistent with the Urban Design Objectives set forth in Section 19.30, as described below.

(19.31) New projects should be responsive to the existing or anticipated pattern of development.

The project is located in a somewhat eclectic mixed-use area between rail lines and industrial districts in Somerville and residential neighborhoods in Cambridge. The site is surrounded by uses including retail, office, residential, manufacturing and auto-related uses, and blended activities like the “Clover Hub” that includes a café and production facilities for a food truck operation. In the Somerville portion of the area, where the future Union Square MBTA station is planned, a number of projects have converted former commercial sites to residential buildings. Because of the close proximity to a future public transit station as well as bus service, retail and other amenities, the City’s growth policies suggest that this is a good location for the development of housing at a moderately high urban scale and density. In addition, the inclusion of ground-floor commercial space is critical to support the feeling of a connected urban streetscape from the future MBTA station to the Cambridge Street mixed-use corridor.

There are several one and two-story structures on site that have some contextual significance related to the historical auto-parts and recycling uses that were a major feature of the neighborhood. In response to these development patterns, the project proposes a design solution that both retains the site’s industrial character and accommodates its new residential function within a mixed-use area.

(19.32) Development should be pedestrian and bicycle-friendly, with a positive relationship to its surroundings.

By adding residential uses and ground floor commercial space, the project should contribute positively to establishing a safe and attractive pedestrian connection from Cambridge Street to the planned MBTA station. The building design will promote active uses and transparency on the ground floor, particularly at the corner commercial space. The project will also include improvements to the public pedestrian environment surrounding the site, in coordination with the Department of Public Works and Traffic, Parking and Transportation Department.

(19.33) The building and site design should mitigate adverse environmental impacts of a development upon its neighbors.

Rooftop mechanical equipment will be located and screened to minimize views from the street and neighboring abutters, and will be subject to compliance with the City’s Noise Ordinance. Trash will be handled and stored inside the building and taken out to curbside only on trash day. A Stormwater Management Plan has been developed to be in compliance with the City of Cambridge Stormwater Policy and State Regulations and will be subject to continuing review by the Department of Public Works. Low Impact Development design features are employed. No substantial shadow impacts on abutters

will be caused by the new construction and none of the adjacent uses have a registered solar energy system. New retaining walls are minimal, located only at the proposed new ramp access to the below-grade parking garage. Architectural lighting will be dark sky compliant and designed to shield lamps from view and minimize light pollution. Pedestrian lighting along the front and side yard areas and driveway will provide safe lighting enhancing the visual landscape in the evenings. The existing site does not contain trees, and new trees and landscaping will be planted according to a plan that has been reviewed with the City Arborist and will be subject to continuing review by appropriate City departments. An extensive green roof will also be utilized, which will assist with reducing energy consumption and managing stormwater flows.

(19.34) Projects should not overburden the City infrastructure services, including neighborhood roads, city water supply system, and sewer system.

A memo was submitted to the Planning Board by the Department of Public Works indicating that the project is anticipated to be able to meet applicable standards for utilities and infrastructure, subject to ongoing review by the Department of Public Works at the building permit phase. The project will also be subject to the City's Green Building Requirements.

(19.35) New construction should reinforce and enhance the complex urban aspects of Cambridge as it has developed historically.

The project preserves and adaptively reuses a building that, while not a landmark building, is nonetheless of historic interest as it is representative of the uses that were historically present in the area, according to comments provided by the Executive Director of the Cambridge Historical Commission. The plan to retain the existing building with a new addition is appropriate given the area's transition in character from more marginal uses such as auto repair, storage and manufacturing to a broader mix of uses that includes housing, office and retail. The height and form of the project is consistent with the scale of recent housing projects in the area. The new addition complements the existing building and presents a subtle background to what is anticipated to become a well-maintained historic streetscape edge and building base. It also appears well set back from the existing buildings so that a clear distinction between old and new is achieved and the unique character of the site is preserved.

(19.36) Expansion of the inventory of housing in the city is encouraged.

The project will create thirty-five (35) new dwelling units, and shall provide affordable units in compliance with the City's inclusionary housing requirements.

(19.37) Enhancement and expansion of open space amenities in the city should be incorporated into new development in the city.

The project increases the open space on the site, and includes the creation of a small landscaped plaza at the corner of Webster Avenue and Columbia Street that will serve as a visual amenity to residents and passersby, and has the potential to be activated by the adjacent commercial space proposed within the project.

2. Conversion of Non-Residential Structure to Residential Use (Section 5.28.2)

Section 5.28.2 contains several provisions that allow modification of the use and dimensional standards for residential development in cases where a structure formerly built for and occupied by non-residential uses is converted to residential use. The current Application is specifically seeking modification of the minimum yard requirements (Section 5.28.23, see below) and minimum private open space requirements (Section 5.28.25, see below) to be the same as in the existing structure. Conforming additions are explicitly permitted pursuant to Section 5.28.26.

Intent of this Section:

- (a) *To allow the economic reuse of buildings that may be substantially out of compliance with the dimensional requirements of the zoning district within which they are located, especially as they are converted to residential use.*
- (b) *To encourage the preservation of buildings of historic or cultural significance by providing opportunities for reuse of the structures.*
- (c) *To establish a framework of development standards and criteria within which existing non-residential buildings that are out of scale and character with surrounding residential uses can be converted to housing of an appropriate style and density while limiting potential negative impacts on neighbors.*

As noted elsewhere in these findings, the scale and density of the project conform to the limitations of the zoning district and the style and character of the project is appropriate to the context of surrounding uses. The Executive Director of the Cambridge Historical Commission submitted a memo dated March 20, 2015 indicating that it is preferable to preserve and adaptively reuse the existing building as it exemplifies the types of commercial uses prevalent in the area through the 20th century. The Board finds that the proposal is consistent with the intent of the Section to provide the dimensional relief needed to enable such an adaptive reuse.

5.28.23 Yard Requirements

The required yards shall be those of the structure existing at the time of the conversion to residential use. However, any construction occurring outside the limits of the existing structure shall be subject to the yard requirements of the district in which the structure is located.

The project proposes yard setbacks that are those of the existing structure, both above and below grade. All construction outside of the existing structure conforms to the yard requirements for residential development in a Business A district.

5.28.25 Private Open Space Requirements

The Private open space requirement shall be that required in the district in which the structure is located, except as modified herein.

The dimensional and locational limitations for Private open space set forth in Section 5.22 shall not apply; any combination of at-grade private open space and decks and balconies at other levels shall be permitted as shall walks intended for non vehicular use. However, in every case where those requirements of Section 5.22 waived by this Paragraph (a) are not met, all portions of the surface of the lot shall be Green Area as defined in Article 2.000 that are (1) not covered by the building or (2) devoted to the minimum area necessary to provide at grade, conforming parking spaces and the minimum necessary circulation and driveways for no more than one parking space per dwelling unit. The amount of Private open space required may be reduced by the Planning Board should the Board find that full compliance cannot reasonably be expected given the existing development of the lot and the provision of parking necessary to serve the dwelling units.

However, where open space requirements are not met, the Applicant shall explore the use of portions of the interior of the building to provide recreational opportunities not possible on the exterior.

The proposal will retain the footprint of the existing building and will result in a net increase in open space at the ground floor by converting paved spaces previously used for parking. Additional private open space will also be created above-grade in the form of balconies and decks.

5.28.28 Criteria for Approval of a Special Permit

In acting upon this special permit, the Planning Board shall consider the standards and criteria set forth in Sections 10.43, 10.47 and 10.47.1 of this Ordinance in addition to the following review standards.

The Board finds that the project meets the criteria set forth in Section 5.28.28 and the criteria for approval of multifamily dwellings set forth in Section 10.47, as set forth below.

5.28.28.1 Criteria Applicable to All Projects

(a) Provision of Parking. Where it is proposed to add dwelling units above the limits established in the base zoning regulations, the Board shall evaluate the impact of increased numbers of dwelling units above that normally permitted in the district on the demand for on-street parking by residents and visitors to the proposed building, particularly in neighborhoods where off street parking is limited.

In reaching a determination, the Board may require that the Applicant provide elements of a Parking Analysis as set forth in Section 6.35.3 of the Zoning Ordinance. Where a project is

subject to additional criteria as specified in Section 5.28.28.2 below, a Parking Analysis shall be required to be included with the Special Permit Application.

The number of dwelling units proposed is within the limits of the base zoning regulations. An adequate number of off-street parking spaces will be provided. The Board did not find a detailed Parking Analysis to be necessary.

(b) Privacy Considerations. Where significant variations from the normally required dimensional standards for the district are proposed, the Board shall evaluate the impact on residential neighbors of the new housing use and any other proposed use as it may affect privacy. The location and size of windows, screening elements, decks, entries, security and other lighting, and other aspects of the design, including the distribution of functions within the building, shall be reviewed in order to assure the maintenance of reasonable levels of privacy for abutters. In reviewing a proposed development plan, the Board shall consider, among other factors, the potential negative impacts of the new activity on abutters as a result of the location, orientation, and use of the structure(s) and its yards as proposed.

There are no immediately abutting residential uses, and the most significant residential portions of the building will be built in conformance with the dimensional requirements of the district. Therefore the Board finds that the project will not have adverse impacts on privacy.

(c) Reduction in Private Open Space. Where it is proposed to reduce the amount of on-site Private Open Space below that required in the applicable district, the Board shall evaluate the proposal in light of the following:

- (1) The extent to which screening and buffering from neighbors will be accomplished*
- (2) The quality and viability of the proposed open spaces as they are designed*
- (3) The tradeoff in benefits and negative impacts of the loss of green space in order to provide the required amount of parking, including consideration of the feasibility of alternate parking arrangements that might produce additional green area, such as placing some or all parking within the structure*
- (4) The availability of common recreational spaces within the building to compensate for the loss of usable outdoor open space*

The proposed design improves upon the condition of the existing lot by converting paved areas to open space that will be an amenity to the residents and commercial occupants of the building as well as a visual and environmental benefit to passersby and the neighborhood as a whole. Other open space improvements, including the proposed street trees and closure of the existing curb cuts, will significantly improve the neighborhood and pedestrian experience. New on-site landscaping will soften the existing industrial character and will help to create a more attractive residential environment. Given the site's location at a prominent point within a mixed-use area, it is preferable to have open space with an open visual feel rather than a screened or buffered space. Because all on-site parking is located below-grade, it will not impact the open space. The project also includes common space as well as private open space in balconies and decks.

(d) Community Outreach. The Planning Board shall consider what reasonable efforts have been made to address concerns raised by abutters and neighbors to the project site. An applicant seeking a special permit under this Section 5.28.2 shall solicit input from affected neighbors before submitting a special permit application. The application shall include a report on all outreach conducted and meetings held, shall describe the issues raised by community members, and shall describe how the proposal responds to those issues.

The Applicant conducted multiple meetings with abutters and neighbors prior to submitting the Special Permit Application, and included a report in the Application Documents summarizing comments that were made and identifying elements of the project that were designed in response to those comments. Testimony at the public hearing was consistent with the comments reflected in the Application.

5.28.28.2 Additional Criteria Applicable to Larger Projects

Where the proposed project includes more than 10,000 Gross Square Feet or more than ten (10) dwelling units, and the proposed Gross Floor Area or number of dwelling units is above the maximum allowed under base zoning regulations, the Board shall evaluate the proposal in light of the following:

The proposed Gross Floor Area and number of dwelling units are within the limitations of the base zoning regulations, and therefore those additional criteria are not applicable.

10.47.4 Criteria for approval of Townhouses and Multifamily Dwellings. In reviewing applications for townhouse developments and multifamily dwelling, the special permit granting authority shall consider and address the following site plan criteria as applicable:

(1) Key features of the natural landscape should be preserved to the maximum extent feasible. Tree removal should be minimized and other natural features of the site, such as slopes, should be maintained.

Landscape elements on the existing lot are practically non-existent, and the proposed development will include the planting of trees and other greenery on-site and within surrounding sidewalks. Comments and suggested improvements by the Cambridge Public Planting Committee have helped to inform the Planning Board's review.

(2) New buildings should be related sensitively to the existing built environment. The location, orientation and massing of structures in the development should avoid overwhelming the existing buildings in the vicinity of the development. Visual and functional disruptions should be avoided.

As noted elsewhere in these Findings, the new portions of the project are consistent with the dimensional standards of the base zoning district and the character of the area.

(3) The location, arrangement, and landscaping of open space should provide some visual benefits to abutters and passersby as well as functional benefits to occupants of the development.

The proposed open space at the front of the site will provide visual benefits to passersby and will improve the area as a whole. Plantings on the green roof will also be visible from the public realm and will provide some visual relief.

(4) Parking areas, internal roadways and access/egress points should be safe and convenient.

Parking is provided below-grade with access and egress from Columbia Street. Safety aspects of the access and egress point will be subject to review by the Traffic, Parking and Transportation Department.

(5) Parking area landscaping should minimize the intrusion of onsite parking so that it does not substantially detract from the use and enjoyment of either the proposed development or neighboring properties.

The proposed below-grade parking will have minimal intrusion on open space.

(6) Service facilities such as trash collection apparatus and utility boxes should be located so that they are convenient for resident, yet unobtrusive.

Trash and utilities will be located within the basement of the existing structure.

3. General Criteria for Issuance of a Special Permit (10.43)

The Planning Board finds that the project meets the General Criteria for Issuance of a Special Permit, as set forth below.

10.43 Criteria. Special permits will normally be granted where specific provisions of this Ordinance are met, except when particulars of the location or use, not generally true of the district or of the uses permitted in it, would cause granting of such permit to be to the detriment of the public interest because:

(a) It appears that requirements of this Ordinance cannot or will not be met, or ...

With the requested special permits, the Ordinance requirements will be met.

(b) traffic generated or patterns of access or egress would cause congestion, hazard, or substantial change in established neighborhood character, or ...

The proposed use and scale of development are permitted in the district and the project will not generate adverse traffic impacts.

- (c) the continued operation of or the development of adjacent uses as permitted in the Zoning Ordinance would be adversely affected by the nature of the proposed use, or ...*

The proposed residential use conforms to the district requirements and will not adversely impact the operation or development of adjacent uses, which are predominantly office or other commercial.

- (d) nuisance or hazard would be created to the detriment of the health, safety and/or welfare of the occupant of the proposed use or the citizens of the City, or ...*

The proposed residential use will not result in any nuisance or hazard. The development will be required to conform to all applicable health and safety codes.

- (e) for other reasons, the proposed use would impair the integrity of the district or adjoining district, or otherwise derogate from the intent and purpose of this Ordinance, and ...*

As discussed elsewhere in these Findings, the proposed use and development are consistent with the character of this evolving, mixed-use district.

- (f) the new use or building construction is inconsistent with the Urban Design Objectives set forth in Section 19.30.*

As discussed elsewhere in these Findings, the project is consistent with the City's Urban Design Objectives.

DECISION

Based on a review of the Application Documents, testimony given at the public hearings, and the above Findings, the Planning Board hereby GRANTS the requested Special Permits subject to the following conditions and limitations. Hereinafter, for purposes of this Decision, the Permittee shall mean the Applicant for the requested Special Permits and any successor or successors in interest.

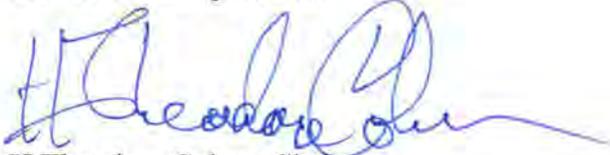
1. All use, building construction, and site plan development shall be in substantial conformance with the Application Documents, including plans dated February 1, 2015 as modified by supplemental plans dated May 12, 2015, and all supplemental documents and information submitted by the Applicant to the Planning Board as referenced above. Appendix I summarizes the dimensional features of the project as approved.
2. The project shall be subject to continuing design review by the Community Development Department (CDD). Before issuance of each Building Permit for the project, CDD shall certify to the Superintendent of Buildings that the final plans submitted to secure the Building Permit are consistent with and meet all conditions of this Decision. As part of CDD's administrative review of the project, and prior to any certification to the Superintendent of Buildings, CDD may present any design changes made subsequent to this Decision to the Planning Board for its review and comment.

The following design elements shall be explicitly subject to continuing review and approval by CDD staff:

- a. Selection and arrangement of façade materials, colors and details
 - b. Landscape design of the plaza space
3. All authorized development shall abide by all applicable City of Cambridge Ordinances, including the Noise Ordinance (Chapter 8.16 of the City Municipal Code).
 4. Throughout design development and construction, the project shall conform to the Green Building Requirements set forth in Section 22.20 of the Cambridge Zoning Ordinance.
 5. In advancing the design of the landscaped areas and sidewalk treatments, the Permittee shall make efforts to incorporate the recommendations of the Cambridge Public Planting Committee to expand the size of tree wells and other plant beds to the extent feasible in order to allow new plantings to thrive. When reviewing landscape design pursuant to Condition #2, CDD staff will work with the Permittee to certify that sufficient efforts are being made to further this objective.

Voting in the affirmative to GRANT the Special Permits were Planning Board Members Louis Bacci, Jr., H Theodore Cohen, Steven Cohen, Catherine Preston Connolly, Hugh Russell, and Associate Member Ahmed Nur, appointed by the Chair to act on the case, constituting at least two thirds of the members of the Board, necessary to grant a special permit.

For the Planning Board,



H Theodore Cohen, Chair.

A copy of this decision 295 shall be filed with the Office of the City Clerk. Appeals, if any, shall be made pursuant to Section 17, Chapter 40A, Massachusetts General Laws, and shall be filed within twenty (20) days after the date of such filing in the Office of the City Clerk.

ATTEST: A true and correct copy of the above decision filed with the Office of the City Clerk on June 17, 2015, by Jeffrey C. Roberts, authorized representative of the Cambridge Planning Board. All plans referred to in the decision have been filed with the City Clerk on said date.

Twenty (20) days have elapsed since the filing of the decision. No appeal has been filed.

DATE:

City Clerk of Cambridge

Appendix I: Approved Dimensional Chart

	Existing	Allowed or Required	Proposed	Permitted
Lot Area (sq ft)	18,140	5,000 min	No Change	No Change
Total GFA (sq ft)	15,446	38,999	37,510	37,510
Residential Base	0	28,630	27,719	Consistent with Application Documents and applicable zoning requirements
Non-Residential Base	15,446	1,780	1,546	
Inclusionary Bonus	N/A	8,589	8,245	
Total FAR	0.85	2.14	2.10	Consistent with Application Documents and applicable zoning requirements
Residential Base	0	1.75	1.51	
Non-Residential Base	0.85	1.0	0.098	
Inclusionary Bonus	N/A	30%	0.525	
Total Dwelling Units	0	39	35	35
Base Units	N/A	30	27	Consistent with Application Documents and applicable zoning requirements
Inclusionary Bonus Units	N/A	9	8	
Base Lot Area / Unit (sq ft)	N/A	604	671	
Total Lot Area / Unit (sq ft)	N/A	465	518	
Lot Width (ft)	varies	50	No Change	No Change
Height (ft)	25'-8"	45	40	Consistent with Application Documents and applicable zoning requirements
Front Setback – Webster (ft)	0	See below ¹	See below ¹	
Front Setback – Columbia (ft)	0	See below ¹	See below ¹	
Side Setback (ft)	varies	See below ¹	See below ¹	
Open Space (% of Lot Area)	0	15% ²	See below ²	Consistent with Application Documents and applicable zoning requirements
Private Open Space (sq ft)	0	See below ²	8,162 ²	
Permeable Open Space (sq ft)	0	See below ²	2,674 ²	
Off-Street Parking Spaces	N/A	35	35	Consistent with Application Documents, PTDM and other applicable requirements
Long-Term Bicycle Parking	N/A	36	40	
Short-Term Bicycle Parking	N/A	4	6	
Loading Bays	N/A	0	0	

¹ Per Section 5.28.2, the Planning Board approves the yards of the existing structure; however, all new additions shall have setbacks that are in conformance with the base zoning requirements.

² Per Section 5.28.2, the Planning Board approves the proposed combination of private and permeable open space as illustrated in the application documents in place of the base zoning requirements.