

February 1, 2022

Historic Districts Commission
141 Keyes Road
1st Floor
Concord, MA 01742

RE: Opposition to Plan for Development 615 Lowell Road

Dear Commissioners,

We are writing to express our strong continued opposition to the developer's new proposed plan for yet another large structure at 615 Lowell Road.

We are incredibly frustrated and disappointed that the developer is again proposing a plan that clearly does not satisfy the threshold conditions for denial that were unanimously determined by the Commissioners in its November 18th meeting, and so importantly commented upon by over 180 Concord residents.

In the newest application, Mr. Bushnell is proposing just as massive of a structure (residence and garage) as what was just denied by the HDC - a 4 to 5 bedroom home with roughly the same width, length and height of a building footprint (i.e., building volume). Note that the developer has intentionally omitted any calculations of building area and volume in his submission, as well as relation to the other historic structures in the area. The style of the house has not changed (a modern, boxy structure inappropriate for this historic corner). The only change is that he has now moved the large garage to the back of the structure (still entirely visible from Hildreth Corner) - which will inevitably lead to a long driveway down the border between 615 Lowell and 625 Lowell, putting the border of trees so essential to the landscape of these lots in danger and replacing nature with cars and headlights.

Over 180 Concord residents and all of the HDC Commissioners have determined that the size and scope of this structure, with its massive residence and garage and total building volume, is simply too big for this narrow lot with its small buildable area and disrupts the pattern of the historic streetscape. This was memorialized in numbers 1 and 2 of the November 18th HDC vote to deny Mr. Bushnell's previous application.¹

From the first meeting in August and in each meeting afterwards, the HDC has consistently told the developer that he would have to substantially reduce the size of the house for it to be appropriate for this particular lot in this particular location. **Mr. Bushnell has again not attempted to address the HDC's concerns and the concerns of over 180 Concord residents - instead all he has done is move around an attached garage (still inappropriate for the historic district)², without meaningfully reducing the size of the development.**

¹ The HDC guidelines state that for the construction of new structures in a historic district, *the size and scale of the building must be appropriate - and this evaluation needs to be in relation to the land area of the lot, the neighboring historical structures, and the surrounding streetscape.* This is further supported by Article 9 of the Historic District Act itself, which states that *in passing upon appropriateness that the commission shall consider the appropriateness of the size and shape of the building or structure in relation to the land area upon which the building or structure is situated.* Square footage, building volume and the overall dimensions of the house, garage and other features of the house are directly relevant to this evaluation. *The HDC has clear authority to implement additional setback, height, massing and dimensional requirements in addition to zoning requirements in order preserve and protect the historic district and its neighboring historic homes.*

² The HDC Guidelines clearly disdain attached garages and note that **"garages in any form may not be appropriate."** In each iteration of the developer's plans, the location of the garage creates major problems - either in front or in the back (now still visible from Hildreth Corner, and creating a sea of driveway that is detrimental to the visual landscape of the district and to the historic house and land at 625 Lowell. **Since all locations for a garage are problematic - this logically demonstrates that given the shape and lack of buildable area for this lot, no garage is appropriate.**

This plan (along with those previously proposed by this developer) will result in a direct and negative impact on the streetscape and the historic, scenic nature of Hildreth Corner, removing all open space between structures, leaving the visual impact of a wide, large building, densely developed with no open space between buildings and with a long inappropriate driveway. This is inconsistent with the rural agrarian streetscape and preservation goals of the Barrett Farm Historic District and impacts not only the front of the lot, but also the view-shed at Hildreth Corner.

We continue to maintain that to minimize the impact on Hildreth Corner, the size and scope of the proposed development needs to be significantly reduced to one half of the size of the structure in his proposal. Additionally, given the lot - we feel that there is no suitable location for a garage on this lot and a garage is not appropriate.

Mr. Bushnell's new proposed plan does not satisfy the conditions for denial of his previous application and we urge the HDC to deny this application.

If not, this will set a **concerning precedent** that a developer can just reapply with non-substantive changes to a previously denied application in an attempt to wear the HDC and community down so that something inappropriate is built in our historic districts so integral to the character of our Town - wasting the valuable time and resources of the HDC, its Committee members, and the Concord community.³

Mr. Bushnell continues to say that due to the shape and narrowness of this lot, there are "trade-offs". The current owner of this lot (Archstone Builders) created this situation for themselves by making such a narrow, odd shaped lot, basically self-restricting the size of a house that would be appropriate. Mr. Bushnell also knows and understands this, but continues to try to shoehorn an inappropriate building into this lot.

But there is a clear answer to this dilemma - and the public has provided it - the developer should propose a building plan that substantially reduces the building volume of the structure and does not include a garage.

Section 1 of the Historic Districts Act states that the Commission's purpose is to act for the "**general welfare of the public through the preservation and protection of buildings, places and districts of historic or literary significance.**" Mr. Bushnell has stated that "something will be built here." **This is a momentous opportunity - and the HDC's obligation - to limit the size of this development to preserve and protect the significant history, architecture and nature of Hildreth Corner.**

We thank you again for your continued time and consideration of this matter of importance to both this neighborhood and the Town of Concord.

Sincerely,

Erika and Richard Santoro
625 Lowell Road
Concord, MA

³ The Historic Districts Commission Guidelines for Administration state that "given the wide variety of issues and interests that the HDC must balance, **as well as the sensitivity of the public to the outcome of their rulings, the Commission needs to exercise care and sensitivity in making its determination while also maintaining and enforcing the Act for the long term interests of the Town as a whole. Clear expectations, consistency and a holistic mindset are important.**