

June 14, 2022

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

RE: Opposition to Plan for Development 615 Lowell Road

Dear Commissioners,

Given the long history of these applications (since August 2021) over 7 meetings and two site visits, and the lack of materials that are still publicly available, I thought it important for the Commission to have all key facts and guidelines that the HDC evaluated in its past hearings in one place.

**Though I recognize this is a long read - I think it is important for the HDC to review this document to understand the facts, the guidelines and how when the facts are applied, approval of this application would have a permanent and detrimental impact on Hildreth Corner and the character and architectural integrity of its historic houses.**

**1. 615 Lowell - an oddly shaped, incredibly narrow and long lot.**

- **The front of the lot (the widest part) is not as wide as Bushnell claims.** Although technically the lot has 150' of frontage, 44.28' of this frontage is directly in front of our historic property at 625 Lowell Road and is not available for ingress, egress or building by the developer due to an easement that is granted solely for the benefit of 625 Lowell Road. **This dramatically impacts the width of the lot - particularly visually. Subtracting the easement area, the lot at 615 Lowell effectively has 106.22 feet of frontage - which would be a nonconforming lot for this Historic District.**
- The lot quickly narrows from the effective 106.22' width at the front to a narrow strip beyond the fields in Barretts Mill.
- The result is that the back half of the lot is so narrow that it is unbuildable and virtually unusable. The front, buildable half is narrow, small and situated so close to our historic, architecturally significant structures that it poses challenges to construct so as not to affect the historic nature of our house and land that surrounds it. **This is why the HDC has consistently told the builder that he needs to substantially reduce the size of the house and that a garage is not appropriate for this lot. One .92 acre lot is not the same as another .92 acre lot - the configuration of the lot matters!**
- In all of Bushnell's application materials, plot plans, renderings, and other visuals, the developer intentionally leaves out many structures of our property (including our large sweeping historic stone patio) as well as the relations to the other historic structures in the area. The developer also intentionally leaves the calculation of total building volume (including outbuildings) out of all of his applications. **The HDC has done two site visits - your eyes are not deceiving you.**
- It is also important to recognize that the current owner of this lot, Archstone Builders, created this situation for themselves by creating such a narrow, odd shaped lot. Archstone knows they basically self-restricted the size of a house that would be appropriate for this lot. Mr. Bushnell also knows and understands this as well, but continues to try to shoehorn an inappropriate building into this lot.

**2. The size, massing and scale of the proposed structure is not appropriate in relation to the awkward narrow size of the lot, the neighboring structures (importantly our historic farmhouse, patio and cooerage) and the surrounding streetscapes.**

- Page 9 and 10 of the HDC guidelines the HDC notes in its **preservation goals for the Barrett Farm Historic District** that although much of the 20th century construction in the district is undistinguished, **large lots are typical of the district, and generally, both antique and contemporary houses occupy a lesser rather than greater portion of the lot size, that it is important for “building scale” to be preserved and maintained** and building, lighting and landscaping plans be carefully reviewed to be consistent with a rural agrarian landscape. It further states that the relationship of *open fields, cultivated farmland*, trees, rivers are integral to the Barrett Farm Historic District landscape. Visual density is to be avoided.
- Additionally, on page 47 and 48, the New Construction and Structures guidelines state that **the size, scale and massing of the building must be appropriate in relation to the land area, neighboring structures and the surrounding streetscape and new structures must not detract from the preservation and protection of the Historic Districts**, and should be in harmony with the existing site and surrounding streetscape.
- These proposed structures - no different in size or scope than previous incarnations that were denied by the HDC (and in fact, larger in total building volume) - **take up the entirety of the width and buildable area of the lot.**
- **The height, size, scope, and location of the proposed structures will have a direct and negative impact on the streetscape/viewsheds (both from Lowell Road and from Hildreth Corner/Barretts Mill Road) and the historic, scenic nature of Hildreth Corner, removing all open space between structures.**
- **What will be left is the visual impact of large building and garage, densely developed with no open space between buildings.**
- **This is incongruous and 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 visually from the side of the lot from Barretts Mill Road.**
- Mr. Bushnell incorrectly attempts to narrow the HDC’s focus to a discussion solely about “massing” of the house. He also tried to make a false comparison of the size of his proposed house to the size of other historic houses in Hildreth Corner - houses built over 125 to 225 years ago on much larger tracts of land - and confuses the discussion around square footage and massing.
- The HDC guidelines state that for the construction of new structures in a historic district, not only does massing need to be taken into account, but also that ***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, total buildings volume (including detached garages) and the overall dimensions of the house, garage and other features of the house are directly relevant to this evaluation.

**3. Garages (attached or detached) and outbuildings are not appropriate for this lot**

- The HDC's February 3rd ruling determined that *“the inclusion of a garage is inappropriate, given the configuration of the site and its context.”*
- For garages, pages 33 and 34 of the HDC Guidelines state that **garages should be located so as to have minimal impact on the streetscape, and that it is important to view the garage in terms of its impact on the overall site. In addition to considering the proposed size, scale and placement of any new garage, the HDC will also consider its relationship to the size of the overall lot, other structures, and adjacent and nearby lots. Visually filling a site by situating the garage in a prominent location adjacent to the main structure can detract from the landscape component of the historic streetscape.** The guidelines additionally note that **“garages in any form may not be appropriate for prominent and highly visible sites.”**
- The developer has tried garage locations in the front of the house, on the side of the house, and in the back - they have all been inappropriate. **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.** For this particular lot - both placements are inappropriate, as they would visually fill the site and will lead to the destruction of the border of trees so essential to the landscape of these lots.

**4. The construction of the structure and creation of the driveway and garage will cause radical alteration to the site and is in conflict with the HDC guidelines.**

- The HDC guidelines instructs that construction of a new structure should never be accompanied by radical alterations to the site.
- **Extensive cutting of existing trees and vegetation such that the essential form and integrity of the historic property and the surrounding district would be impaired is inappropriate in the Historic Districts and should be avoided.**
- On page 38 of the guidelines, the HDC notes that before removing vegetation careful consideration should be given to the role of such vegetation in the appearance of the site and the historic character. **The guidelines further state that the HDC strongly encourages the preservation of mature trees whenever possible, and urges property owners to take such trees into consideration when planning any significant alterations or additions to the site.**
- Visible from both Barretts Mill/Hildreth Corner and Lowell Roads are a series of 7 old growth trees that line the border between the lot at 625 Lowell Road and 615 Lowell Road. Half of these trees (towards the front of the lot and visible from both Lowell and Barretts Mill Roads) are located on the 615 Lowell lot, the other half on ours. **These trees are essential to the existing form, integrity and visual interest of these lots, and the landscape of Hildreth Corner and Barrett Farm Historic District.**
- In both sets of plans included in the new application, the garage (in both plans entirely visible from Hildreth Corner, Lowell road and, together with the house, taking up the entire visible width of the lot) - **will lead to the destruction of the border of trees so essential to the landscape of these lots. Please see the letter from a certified arborist attesting that the placement of a garage/driveway will lead to the death of these trees.** These trees are additionally subject to a covenant between the lots to preserve the trees - which these plans do not conform with.
- Pages 51 and 51 of the guidelines note that applicants should minimize the amount of paving - and should be both discrete in placement and conservative in amount of paving required. The guidelines note that **existing trees should never be removed to expand parking areas. The driveway and garage continue to fail in all regards.**

## **5. The Planning Division's May 27th Letter to the HDC is Misleading**

- In the Planning Division's May 27th Letter to the HDC, the Planning Division provides a series of examples of addresses, their lot width, their square footage and if they have a garage. **This is misleading for a number of reasons, and should not be relied upon by the HDC.**
  - **This data ignores and does not account for the oddly shaped, incredibly narrow and long configuration of this lot and its situation with other historic structures in Hildreth Corner.** Many of these lots have "normal" configurations - unlike the lot at 615 Lowell.
  - **Only 5 of the 24 properties listed are actually in the Barretts Farm Historic District.** As the HDC is well aware - **each Historic District has different preservation goals, and most of these listed properties are in the American Mile or Main Street Historic Districts - which have different character / preservation goals than the Barretts Farm Historic District.** For example, the overwhelming majority of these lots are "in-town" - where houses were "larger, older and closer together" and provide a "village setting, as well as the siting of its structures both close to the road and to each other." Buildings are "generally close together" and a "visual density" is a goal to preserve. **These are not good examples of the Barretts Farm Historic District, where both antique and contemporary houses occupy a lesser rather than greater portion of the lot size, that it is important for "building scale" to be preserved and maintained and building, lighting and landscaping plans be carefully reviewed to be consistent with a rural agrarian landscape. The relationship of *open fields, cultivated farmland, trees, rivers* are integral to the Barrett Farm Historic District landscape.** Visual density is not consistent with the
  - Finally - the Planning Division hinges its support of this new application based on new architectural elements introduced in the design as why this application should pass muster. First, it's questionable whether any new elements introduced are novel from the multitude of plans that have been denied. **But most importantly, this blatantly ignores the findings of the HDC, which focus on two threshold issues (none having to do with architectural design per se): 1) the size, scale and massing of the proposed structures are not appropriate to the land area and shape of the lot and 2) the inclusion of a garage is inappropriate, given the configuration of the site and its context.**
  - **The total building volume of the development (of just the house) is roughly the same dimensions as the previous denials - and the total building volume (accounting for garage) has actually increased in this plan instead of decreased.** All of his proposed plans that have been denied have been roughly between 3400 - 3800 sq.ft. We note that this new building volume does not even include the building volume of the two-bay garage included in the plans (and additional 24' wide x 26' long x 16' high).
  - **By both increasing the total building volume of the development and including a two car garage, Mr. Bushnell has again (for the 8th time) not attempted to address the HDC's concerns and the concern of over 260 Concord residents.**

We believe that the guidelines need to be the "North Star" to guide the important work of the HDC towards its ultimate purpose of preserving the history and scenery of its historic districts. **Given the facts of this new application applied to the previous conditions of denial and the guidelines of the HDC, the only logical and consistent outcome is that the HDC deny this application because it has not substantially reduce the building volume of the structures and does not include a garage.**

As 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.**

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 hope that this helps to guide your important work related to this application.

Sincerely,

Richard Santoro

625 Lowell Road