



MANCHESTER-BY-THE-SEA PLANNING BOARD

TOWN HALL
10 Central Street
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July 11, 2022

The PB has been requested by the ZBA to provide a statement on the proposed SLV 40B project for Shingle Hill. The PB finds the development proposal is unsuited to and inappropriate for its site.

We reference below findings from recent Manchester Planning Reports:

1. **Open Space & Recreation Plan (OSRP) 2021-2027, recently submitted and State-approved**
2. **Town Master Plan 2019**

Refer to the OSRP 2021 -2027 that has been approved by the State, which finds:

- Steep site with shallow-to-bedrock soils are typical in MBTS, and create severe limitations for construction of on-site septic fields
- The native rocky soils tend toward fast runoff, making detention basins or installation of infiltration systems onsite necessary to prevent flooding of lower elevation
- Municipal sewage treatment is essential for high-density development given town's preponderance of poor-percolating soils; the existing site is inappropriate for onsite treatment.
- The adjacent Cedar Swamp Aquifer is a major recharge area for the town that must be protected
- The Town has a Ground and Surface Water Resource Overlay District (GSWROD) to protect town water resources and ensure a future supply of safe drinking water
- The site of the proposed 40B project (with 25% Affordable units) is adjacent to the Town's 1,600-acre Wilderness Conservation Area, Sawmill Brook, and groundwater recharge for approximately 50% of town water supply
- Cedar Swamp must be protected from runoff, steep slope development, an increase in impervious surfaces, and removal of soils, trees, and vegetation

Given that the town (through zoning re-codification, overlay districts, the efforts of its Affordable Housing Trust, and other initiatives) is **actively working toward accommodating both more Affordable and income-diverse housing, the PB's objection to the project is not to the number of housing units, but to the woeful mismatch of project scale, massing, and infrastructure services to this environmentally sensitive greenfield site.** While the site does fall within the LCD, where residential uses are not allowed, a Special Permit is required for all LCD development. Special Permit review would require significant conditions, so as to prevent degradation to natural and town resources and provide development in keeping with the Town's Master Plan goals.

Taking our cues from the 2019 Master Plan Goals for the LCD, the PB would look for:

- Safe, accessible, and appropriate housing, transportation, and mobility choice
- Planned development in the LCD, for example:
 - Projects located where large-scale development and/or housing are more suitable, such

- as on already disturbed lands that exist elsewhere in the LCD
 - Senior Housing, an identified Master Plan need already allowed in the LCD
 - Expansion of modestly scaled by-right Affordable housing stock
- Assurance that projects mitigate development impacts on critical resources

Examples of Conditions we would call for if this project fell under PB Special Permit review (not meant to be an exhaustive list, but indicative of the types of Conditions we look for):

- Development of a size, type, and density **compatible with town character and natural environment** – this project is woefully out of scale and character with the town and the natural environment.
- **Viewshed protection** would be required due to the high elevation of the site and steep topography, to protect town's character and natural resources. Protection of views from both School Street and from the MECT trail system would be required.
- Measures to **prevent and mitigate environmental degradation** – this project brings a high degree of land disturbance on a heavily wooded site, and with it the removal of mature trees and native soils. Destruction of a naturally occurring rocky hilltop would require significant blasting and bedrock removal in quantities that far exceed what is allowed by right in the Town's earth removal bylaw.
- **Adequate safety and egress routes**, with concern for a single point of access and lack of redundancy for emergency services
- **Connection to municipal sewer** for a development of this scale and density would be required; geology and slopes are inappropriate for septic field as noted in the OSPR. More recently, a letter to the Town from MA-DEP (December 7, 2021) recommends against "any major sewer extensions" in the Town other than for limited commercial development. As the existing municipal sewer in School Street does not extend north of Route 128, this project would necessitate a major sewer extension.
- **Best management practices such as LID (low impact development)** to protect resources and character, **maintain hydrologic process** "by emphasizing conservation, use of on-site natural features, site planning and distributed stormwater management process that are integrated into a project's design including:
 - Conserving vegetation
 - Protecting healthy soils
 - Reducing and disconnecting impervious surfaces, and
 - Infiltrating runoff on site"
- Site development with an **emphasis on walkability/bikeability, accessibility, and the pedestrian environment**. This development actively dis-incentivizes walking and other more sustainable modes of transportation, such as bicycling, with its extremely car-oriented site design, steep grades, and lack of pedestrian and bicycle accommodations.

Given that the project meets few or none of those Conditions, the PB finds it detrimental to the town and would not support this development were it serving as the SP regulating authority.

Respectfully submitted,
Town of Manchester Planning Board