

September 28, 2022

Via email to Mr. Ethan Parsons

Ms. Toni Mooradd, Chair
Planning Board
Town of Ipswich
25 Green St.
Ipswich, MA 01938

Re: 55 Waldingfield Road, Special Permit Application by Ora Incorporated

Dear Chair Mooradd and Members of the Planning Board

Below I offer five reasons to deny the special permit application by Ora Incorporated for the proposed corporate complex development at 55 Waldingfield Road. The *special permit* (emphasis supplied) is not an obligation for the Planning Board to approve. Rather the Great Estates Preservation Development bylaw provides a unique opportunity to shape and protect the heritage of Ipswich and community. I believe Ora Incorporated has failed to meet the threshold criteria embodied in the GEPD and therefore the special permit application should be denied.

- **Incompatible with Neighborhood Character.** Ora's proposed corporate office complex threatens to irrevocably **degrade** the character of a designated Scenic Road in a **rural residential area**. Nothing in the GEPD bylaw remotely suggests its intent is to protect historic great estates at the expense of residents. For example, the proposed 24X7 hotel and dining facility with 30-plus parking spaces located within the 250' setback is an outrageous affront to the rural setting. As shown in the picture below, a 33-space parking lot, nearly the same as Ora's proposal, at a local lodging facility offers an understanding of what a commercial parking lot looks like. Notably the picture is unlike the drawings presented by Ora's architects which contain no cars, trucks, or delivery vehicles conveying an unreal depiction of the site. Furthermore, the development of a corporate complex with offices for 50-100 daily employees and service personnel plus 90 parking spaces is incomprehensible in the rural residential setting. The complicated proposed corporate development is too big, too impactful to be squeezed into a small parcel of land on a designated Scenic Road in a rural residential zone. In large measure the complexity is a function of trying to do too much with too little land in an area that is incompatible with corporate development.



Ipswich Example. ~33 space small lodging parking lot within 250' of roadway

- **Significant Decrease in Road Safety.** The Planning Board has heard from professional traffic planners and should not rely upon the musings of architects and attorneys for their opinions on traffic impacts. The Ora Incorporated traffic consultant projects an increase of more than 500 average daily vehicles per day. The Ipswich independent consultant wrote the traffic increase is “significant.” The expected increase is **~30% greater** than the existing traffic count of 1,645 daily volume. It is worthwhile to compare this increase in traffic volume to the 8-9% inflation we have in our economy today and which all of us feel at a visceral level. The projected increase on Waldingfield is **three times greater** than what each of us presently experiences for our food, goods, and services. The traffic increase is a tangible impact that has no beneficial results. Indeed, as noted by Professor Yaro, there is a cause-and-effect relationship between increased traffic flow and increased road accidents and injuries. The GEPD bylaw was not enacted to increase congestion and imperil safety on our roads, let alone a winding, narrow designated Scenic Road. Ora’s traffic mitigation plans are unenforceable and reliant upon self-reporting by a firm with motivation to not report transgressions to the conditions of the draft decision document.
- **Respect for Community Development Plan.** The Ipswich CDP unambiguously calls for concentration of commercial development in the **downtown area**. Downtown is where the infrastructure is located and where existing shops and restaurants benefit from commercial development. The CDP promotes preservation of pastureland which is the opposite of up to 125,000 SF of commercial development at 55 Waldingfield Road. Our community worked for years on the CDP and the Planning Board is encouraged to not undo the work of fellow citizens.
- **Bureaucracy and Enforcement.** The current version of the draft decision document contains **56 conditions** that prescribe the proposed development. Each of these conditions needs to be enforced by an already understaffed Town government. While we unfortunately do not have a fiscal impact analysis, Town resources will be required for enforcement. It is an open question as to who will bear the brunt of responsibility for enforcement and at what cost to Ipswich.

- **Ipswich Community.** I encourage the Planning Board to listen to and respect your community. Ora Incorporated is a **corporate outsider** motivated by corporate interests such as profit and growth. We encourage Ora Incorporated to locate in an appropriate location such as downtown where the infrastructure is compatible with offices, lodging, dining, and business life. We live here and have different motivations. We nurture our families, shop in the local stores, and enjoy our environment. Our community has submitted over 135 letters in support of Saving Waldingfield, added over 500 signatures from Ipswich residents to a petition in opposition to the proposed development, placed over 300 yard signs in favor of Saving Waldingfield, and attended all of the Planning Board meetings. We are engaged as it is our community that is threatened by the development.

Thank you for your time and attention.

Sincerely,

Jack Whittier
35 Waldingfield Road
South Hamilton, MA 01982