

Dear Planning Director, Chair and Board Members:

Waldingfield — both the farm and the road — are too important to lose to corporate development. It is astounding that the draft decision on Ora's proposed project states it will "enhance the neighborhood," as you currently surmise.

A corporate development will have significant adverse impact on what is likely Ipswich's most scenic road, directly across from the historic Appleton Farms flanking nearly the entire southern portion of Waldingfield Road. Professor Robert Yaro of the University of Pennsylvania provided detailed and unrebutted expert testimony on this point (excerpts attached).

You should also be aware that of the approximately two dozen Scenic Roads in Ipswich (<https://historicipswich.org/scenic-byways/>), only five have **any** non-residential uses at all.

Crucially, **none** of those few non-residential uses share anything in common with the private "business offices" and "conference center" uses Ora proposes. Instead, those uses are a public elementary school, a church, working farms, and outdoor recreation areas:

Argilla - Ascot Riding Center (lesson/boarding facility for equestrians), Russell Orchards, Castle Hill, and Crane's Beach.

Candlewood - Backbay Farm (lesson/boarding facility for equestrians) and public soccer fields.

Linebrook from School to Howe - Marini Farm and Doyan Elementary School.

Linebrook from Leslie to Boxford - Linebrook Farms (lesson/boarding facility for equestrians).

Topsfield Rd - The Turner Hill Club.

We all know that each Scenic Road in Ipswich is different – they each have their own unique character. **But what they all have in common is that none have "business offices" or a "conference center." That would be a first on any Scenic Road in Ipswich.**

The introduction of a corporate campus on what is now an equestrian property will fundamentally undermine the scenic nature of Waldingfield Road. Please consider that many others have come to the same conclusions, as evidenced by the opposition of the majority of the neighbors, abutters, over 500 Ipswich residents, and over 300 local community members. Collectively, their compelling testimonies and insight from Dr. Yaro that should carry great weight in this process. This project will not "enhance the neighborhood." Please vote NO.

Sincerely,

Daniel N. Markos
93 Wenham Road
Topsfield, MA

Dr. Yaro's January 26, 2022 testimony:

“Furthermore, the State Register of Historic Places-listed Appleton Farms (Massachusetts Cultural Resources Inventory Survey (“MACRIS”) Designation IPS.AR) affirmatively designates both Waldingfield Road and its stone walls (MACRIS Designation IPS.951) as contributing historic resources within the Appleton Farms listing. The Appleton Farms MACRIS Inventory Form A specifically states as follows:

Waldingfield Road. 1637. Contributing (IPS.951) Waldingfield Road defines the northern boundary of the farm today, though, as with Bay Road, the Farm originally owned land north of this road to the Ipswich River. Waldingfield Road is the earliest road at Appleton Farms. It was laid out in 1637, and served as the primary access road, off of the Bay Path, to Samuel Appleton's first homestead, built in 1638 not far from the Ipswich River. Today this road is an important spine in understanding the summer home era at Appleton Farms; most of the large summer homes built in the late 19th and early 20th century by Appleton siblings are still extant, nestled on a low ridge between Waldingfield Road and the Ipswich River. Each of these houses was separated from the farm by various Appleton family members by the mid-20th century and Waldingfield Road became the farm's northernmost boundary. Today the road is a 40' wide asphalt road with wooded edges, occasionally broken by pasture fencing or house yards. Long lengths of New England stone walls run along the wooded edge on both sides of the road.

By any measure, the exceptional historic nature of Waldingfield Road and its environs means that any proposed changes impacting the Road and surrounding neighborhood warrant exceptionally careful scrutiny. In my expert opinion, as detailed below, the adverse impacts on traffic and neighborhood character from the proposed project — even with the size reductions recently proposed by the applicant — are major and significant, and warrant denial of the special permit.”

Dr. Yaro's February 7, 2022 testimony:

“My overarching concern remains that Ora's proposal will damage the neighborhood character and cause irreparable harm to one of the most significant historic roads and landscapes in the country. Equally, I remain convinced that the threat that the increased traffic Ora's proposal will unavoidably generate poses to the lives and well-being of local residents and visitors alike who walk, run, cycle, or ride on Waldingfield Road simply cannot be mitigated adequately.”

““Bespoke” Corporate Campuses Often Generate Long-Term Adverse Consequences for Neighborhood Character. Across the Northeast, there are dozens of failed “bespoke” corporate campuses in rural and suburban areas of the type proposed by Ora, as companies constantly evolve in unanticipated ways. As the former president and CEO of the Regional Plan Association, which advises municipalities throughout New York, New Jersey, and Connecticut

on high-quality land use planning, and as the founding director of the UMass Center for Rural Massachusetts, in my experience towns face two major long-term challenges with such bespoke campuses. First, towns are often left with abandoned facilities after the initial user outgrows them and departs, as these bespoke campuses are exceptionally challenging to repurpose, and are often undesirable to subsequent potential buyers. Alternatively, towns commonly find themselves faced with repeated proposals from the existing owner to expand or modify bespoke campuses, to meet ever-changing corporate needs. Such towns frequently feel compelled to reluctantly approve changes they would not have approved initially, out of concern that the alternative — abandonment — is worse. In both instances, what initially appeared to be a positive land preservation opportunity for host communities in many cases turns into a wholesale change in local character and uses instead.”

“In summary, approving Ora’s proposal would be inconsistent not just with both the Great Estates Bylaw and the special permit criteria of the Protective Zoning Bylaw, but inconsistent as well with the Town’s and the neighborhood’s long-term interests. It would significantly degrade the historic and scenic neighborhood character of Waldingfield Road, while simultaneously creating irreversible and significant safety concerns for pedestrians, runners, cyclists, and riders. I would encourage the Town to work with Ora to identify alternative sites where this corporate headquarters and conference center will be a more appropriate and compatible use.”

Dr. Yaro’s July 15, 2022 testimony:

“Detailed Conditions Are Challenging to Enforce. Finally, I understand that there has been discussion of imposing a variety of special permit conditions, including limiting the amount of on-site parking, requiring off-site shuttles, or limiting the number of individuals on-site. As explained in detail in my February 7 testimony, such conditions often sound highly appealing in the abstract. However, constantly monitoring and enforcing such conditions imposes a notoriously onerous burden on town governments, and frequently leads to protracted community conflicts. In practice, there would be little recourse for the Waldingfield Road community in the event Ora’s compliance with such monitoring-intensive conditions falls short of Ora’s obligations. More generally, in my professional experience I note that the very fact that the Planning Board is finding it necessary to even consider imposing such extensive and detailed conditions limiting how the property is used is a strong indicator that the project may not be situated in an appropriate location in the first place.”