

August 3, 2021

Daniel C. Hill, Esq.
Hill Law
Six Beacon Street, Suite 600
Boston, MA 02108

**RE: Architectural Review
518 and 540 South Avenue Comprehensive Permit
Weston, Massachusetts**

Dear Mr. Hill:

This firm has been retained by neighbors and abutters to the proposed 200-unit Chapter 40B project at 518 and 540 South Avenue in Weston. I am a licensed architect in the Commonwealth of Massachusetts with over 30 years of experience, much of it in the design of multi-family housing. I have reviewed the design elements of similarly-scaled Chapter 40B developments in other towns, and have provided testimony to the state Housing Appeals Committee.

The 9.54 acre Project Site is wooded with extensive wetland areas and topographic changes in multiple directions. Two existing single-family homes are proposed to be razed and be replaced with a large 3-5 story structure with 257,000 sf of floor area. A wastewater treatment plant is proposed near the existing home at 540 South Avenue, between two single family neighbors. Access to the development is provided along the wastewater plant and extends around the building, exiting through the 518 South Avenue portion of the site.

The development footprint covers practically all the developable area of the site; the building footprint is limited only by wetlands and those areas necessary for circulation, waste water treatment and stormwater retention structures. The project is monumental in scale, with impacts to neighbors that are significant, and the site is not adequate in size to mitigate those impacts.

The plans lack three-dimensional information that would show the scale of the building within its context, and the effectiveness of the design strategies employed to integrate it into its surroundings. To assist in understanding the scale of this project, we have prepared a three-dimensional scale analysis that is based upon plans in the application and data readily available from public sources. The attached drawings are accurate to scale for massing and scale analysis purposes.

The building footprint of approximately 2.2 acres, with dimensions of approximately 300 feet by 480 feet, exceeds that of nearby Weston High School's football field. Its scale greatly exceeds that of the adjacent Pope St. John XXII National Seminary and Weston's Campion Center, both of which have much smaller

footprints and greater modulation of scale and mass. The massive scale of this project dwarfs and overwhelms its single-family neighbors

It is widely recognized that Chapter 40B development leads to more housing units on less land than would be allowed by zoning. To address this common 40B design challenge, the **Handbook: Approach to Chapter 40B Design Reviews** devotes a section to building massing and scale.

Scale may be defined as the height and massing of a building and building elements and the relationship to surrounding spaces and structures. Common relationships are to the size of a human, to the context of the site, or in the relationships to adjacent buildings.

The mass and scale of a building may be reduced by altering the building's bulk. The features that can minimize the mass and scale should be about the same size as the same features on adjacent properties.

Further, the **Handbook** references the **Affordable Housing Design Advisor** in Attachment C. This handbook also addresses building scale and massing, as well as building form and image:

Building Scale and Massing

Relate the size and bulk of the new structure to the prevalent scale in other buildings in the immediate neighborhood.

Building Form

Consider utilizing a variety of building forms and roof shapes rather than box-like forms with large, unvaried roofs. Consider how the building can be efficiently manipulated to create clusters of units, and variations in height in height, setback and roof shape.

Image

Avoid creating a building that looks strange or out of place in its neighborhood.

Finally, **Massachusetts Sustainable Development Principles** addresses development in the Section "Expanding Housing Opportunities" in part by stating: *Foster the development of housing, particularly multifamily and smaller single-family homes, in a way that is compatible with a community's character and vision and with providing new housing choices for people of all means.*

The overall building design presents a very urban character that does not relate to its context. It does not employ any of the strategies referenced in comprehensive permit design handbooks referenced above. Instead, it contains a single 3-5 story building wrapped around a parking garage with a height of nearly 60 feet in some locations. The setbacks are inadequate and juxtapose a tall building too close to single-family homes and wetlands. The minimal setbacks leave no room for an adequate buffer. With a building footprint of over 2.2 acres, a roadway around the building, and significant retaining walls around much of the site, **this development represents an uncomfortable and excessive intrusion on adjacent properties.**

This project needs to be re-designed to suit the site and context.

Respectfully submitted,

Spalding Tougias Architects, Inc.

A handwritten signature in black ink, appearing to read "Cheryl Tougias". The signature is fluid and cursive, with the first name "Cheryl" written in a larger, more prominent script than the last name "Tougias".

Cheryl Tougias, AIA LEED AP
Principal