



Office of the  
PLANNING BOARD

## TOWN OF GROTON

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May 8, 2024

Mr. Bruce Easom, Chair  
Zoning Board of Appeals  
173 Main Street  
Groton, MA 01450

**RE: Heritage Landing application for a Comprehensive Permit  
Cow Pond Brook Road, Assessors' Parcel 248-42**

Dear Mr. Easom and ZBA members:

The Planning Board sincerely appreciates the time and consideration you have dedicated to reviewing the Heritage Landing comprehensive permit application. You have conducted the public hearing process in a careful, considerate, and respectful manner while seeking to protect the Town's interests.

As you approach the end of the public hearing process, the Planning Board respectfully submits the following comments on the Heritage Landing application for your consideration.

1. Project location:

- a. The site of the proposed project is located far from the Town Center (over five miles) and other areas offering a concentration of services and amenities.
- b. Public or private transit is not readily available to connect residents to other areas.
- c. The site is adjacent to a closed landfill, a municipal waste transfer station with a commercial composting operation, and a police shooting range. This raises issues of Environmental Justice.
- d. Athletic fields are adjacent to the site that have significant peak traffic flows depending on the season that causes heavy traffic and noise.
- e. The site is a former sand and gravel pit that was presumably excavated down close to the water table. A substantial volume of fill material, beyond what the

Town's regulations reasonably allow, will be required to create a suitable foundation for construction of the proposed roadway and homes.

- f. The above factors combine to make the site a substandard location for housing in general, and for affordable housing in particular.

2. Project layout:

- a. The revised project layout consisting of 28 units within a reduced footprint on the subject parcel is an improvement over the original proposal consisting of 40 units.
- b. In addition to the substantial volume of fill that will require hundreds of truck loads, peak traffic times vary due to the athletic fields and transfer station and would become a safety issue during construction.

3. Lighting:

- a. The revised lighting plan dated 4/8/2024 is a slight improvement over the original lighting plan.
- b. The proposed lighting plan includes 28 pole mounted street lamps. This high number of street lamps is not required, nor is it appropriate, for a rural residential development on a low-speed residential dead-end roadway and for the locus which is adjacent to light sensitive properties (i.e., scientific observatory and wildlife habitat). The Planning Board recommends one pole mounted street light only, at the minimum necessary lumen output, at the intersection of the proposed road and Cow Pond Brook Road.
- c. The Planning Board recommends all lamps to be a correlated color temperature less than 3000K.
- d. The Planning Board encourages the ZBA to require that all exterior lighting on the site comply with the International Dark-Sky Association (IDA) Fixture Seal of Approval program certification standards and be designed and installed to minimize glare or spillover onto or into any adjacent properties.

4. Soil testing:

- a. The Planning Board is concerned about the lack of updated soil testing data. The soil testing data provided by the applicant is from 2005. The proposed site is a former sand and gravel pit that was excavated down near to the water table. Development projects in similar site contexts have proven to be problematic with respect to the dynamics of high groundwater and stormwater runoff. For example, the homes on Olivia Way in the Reedy Meadow Estates subdivision were impacted by flooding in 2018 due to a combination of high groundwater and stormwater runoff from the development. Mitigation of the flooding required the design and construction of supplemental stormwater management infrastructure and emergency action on the part of the Town of Groton and the Commonwealth

of Massachusetts to allow for alteration of adjacent conservation land protected under Article 97. Additionally, the impacts of climate change have led to an increase of intensive storms. Stormwater run-on is likely to impact the project site being at a lower elevation.

- b. The Planning Board encourages the ZBA to condition the permit to require that the applicant perform a geotechnical investigation of the site to determine the soil type(s) and groundwater elevation. The results of the investigation would inform the design of the sewage disposal system and of the stormwater management system. The design of these systems would need to comply with Title 5 and the Massachusetts Stormwater Handbook and the Stormwater Management Standards. The results of the soil testing shall be provided to the Town and included in the Final Stormwater Report.

5. School bus access:

- a. GDRSD has indicated that school buses do not travel on Cow Pond Brook Road north of the intersection with Hoyts Wharf Road, at the present time.
- b. According to correspondence from GDRSD to the ZBA, an adequate school bus turnaround circle should have a minimum diameter of approximately 100 feet with no center island and low curbing. Refer to the existing turnaround at the end of Worthen Drive/Dale Lane.
- c. Cow Pond Brook Road and its intersecting roads do not have sidewalks. If the school bus stop is to be at the intersection of Cow Pond Brook Road with Lowell Road or Hoyts Wharf Road, then the students would need to walk on the street.

The Planning Board thanks you for considering these comments, and for your dedicated service to the Town.

Sincerely yours,



Takashi Tada  
Land Use Director/Town Planner  
For the Groton Planning Board