

**Comments of the Historic Preservation Commission
To the Neptune Township Planning Board
Regarding proposed modifications to the
Ocean Grove North End Development Plan**

October 8, 2024

As an advisory commission to the Planning Board, the Historic Preservation Commission offers the following commentary on the proposed modifications to the Ocean Grove North End Development. These comments were discussed by the Commission at its 8 October 2024 meeting and were approved by unanimous vote for submission to the Planning Board.

Executive Summary

The HPC maintains that the Ocean Grove North End Development (OGNED) site plan does not conform to the Amended Redevelopment Plan. It does not adhere to the stated requirements that the plan be historically appropriate for the Ocean Grove State and National Historic District, and it is not in conformity with the Guidelines.

Several years ago, when the Planning Board first prepared the Amended Redevelopment Plan, it was explicit in recognizing the value and importance of the Ocean Grove Historic District. The Board went so far as to require the scale of any buildings in the redevelopment area be compatible in scale and design with the surrounding neighborhood. The Board's laudable inclusion of this language was instrumental in reassuring the community that any new buildings would be "context-sensitive."

The following excerpts from that plan make clear the Planning Board's intention that any proposed buildings conform to the Historic Guidelines (emphasis added):

- Page 1, ***"Because of the historic significance of Ocean Grove and viability and character of adjoining residential neighborhoods, the design standards of the Ocean Grove North End Redevelopment Plan have been carefully crafted to ensure that the redevelopment of the site is compatible with the historic character of Ocean Grove and is consistent in scale and design to the surrounding area."***
- Page 4, ***"...Improve the aesthetics of the North End area through context-sensitive development...Promote development that is compatible to the scale and complementary to the historic character of Ocean Grove...The Plan's purpose is to create a mixed-use community and destination complementary to the scale and historical context of Ocean Grove."***
- Page 8, ***"Consistency with the architectural heritage of Ocean Grove is a critical design element of the project...The design of all structures in the redevelopment plan area shall be consistent with the historic style and period of significance of Ocean Grove."***
- Page 9, ***"In addition, the goals and objectives of the Historic Preservation Element of the Master Plan address the issue of new construction within the historic content:
1. To preserve the historic character, livability and property values of historic structures and neighborhoods...and encouraging new construction that is compatible in scale and design to the physical character of the surrounding neighborhood."***
- Page 14: ***Projects to be developed within the North End Redevelopment Plan area shall be consistent with the Ocean Grove Historic District Commercial Building Façade Architectural Design Guidelines and Ocean Grove Historic District Architectural Design Guidelines for Residential Structures, as amended, and compliance with same shall be required to the extent set forth in a negotiated Redevelopment Agreement and authorized by Resolution of the Township Committee.)***

As it stands, the OGNED application fails to conform to the Ocean Grove Historic District Architectural Design Guidelines (Guidelines). Notable non-conformities include:

- **Form, Height, and Mass:** The proposed hotel and condominium buildings are oversized in form, height, and mass within the architectural context of the historic district and with reference to OG’s historic architecture. Proposed towers and dormers are oversized and inconsistent with historic forms common to the historic district.
- **Roof Types:** The hotel and condominiums utilize historically inappropriate modern roof forms (such as parapets, faux-Mansard forms, and faux gables). The retail structure (and one condo?) utilizes a non-conforming standing-seam roof.
- **Windows:** The proposed fenestration patterns on the hotel and condominiums were deemed non-historic for an over-reliance on banks for triple-window sets, creating overly “windowed” facades in opposition to historical precedence. Note: some of these triple window sets have been replaced by commensurate single windows. The overly “windowed” aspects of the project remain and recent modifications by OGNED further magnify and accentuate the problem.
- **Exterior Siding, Finishes, Facings and Materials:** Historically appropriate clapboard and shakes materials are applied in non-historical ways, creating modern and post-modern elevations that fail to conform to historic design vocabularies.
- **Porch and Balcony Decks:** The project forgoes traditional *projecting* porches and balconies—a hallmark of Ocean Grove’s “open porch” community—in favor of modern, inset, “void” balconies.
- **Exterior Lighting, Lamp Post, and Yard Lighting:** The project is grossly over-lit by historic standards. This is most noticeable on the hotel, where doorways routinely have two lanterns on each of the multiple small balconies.
- **Awnings:** The commercial portion of the development relies on a standing-seam roof running the length of the boardwalk frontage. Standing seam roofs are non-conforming. They are most often used in strip malls and other modern commercial applications.
- **Rooftop Construction:** The non-conforming roof forms (noted above) include historically inappropriate public and private roof decks on the condominium structures. These modern elements are visible to the public and **disregard** the historic prohibition against rooftop decks.

NB: For a comprehensive list of non-conformities, see the attached “Tech Notes” that were provided to the developer prior to their appearance, and subsequent denial, before the full Commission. Also attached is the HPC Resolution denying OGNED its application for a Certificate of Appropriateness.

HPC attempts to help OGNED address non-conformities in its application

At the request of the Land Use Administrator, three members of the Commission (the chair and two co-chairs) were convened as a working group (the so-called “Tech Committee”) to meet with OGNED.

Many hours were spent in conversation with all parties in an effort to move the project forward. This HPC subcommittee provided OGNED with detailed information related to all aspects of the OGNED proposal and discussed possible options and modifications that could bring the project into conformity. The developer, in the end, opted not to adopt the majority of HPCs guidance.

HPC maintains that, with substantive changes, the OGNED application can be brought into conformity.

Below is a list of meetings between the HPC Tech Committee and OGNED over the course of 38 months prior to OGNED’s appearance before the full Commission:

4 March 2019

HPC offered a courtesy review of the proposed design prior to the applicant submitting an official application. Result: “The Review Team has identified significant deficiencies in how the OGNED Preliminary Architectural Plans (Site and Elevation) fulfill HPC-related aspects of the Redevelopment Plan Ocean Grove North End.”

15 September 2021

HPC met with the OGNED team (including Stephen Carlidge and Justin Calvert, architects, William Gannon III, and Joel Brudner, principles, Janet Foster, historian, and Bernard Haney, Land Use Administrator. The applicant was informed of an itemized list of non-conformities for the Hotel, Commercial Area, Condo Building I and Condo Building II. The group discussed how the project might be brought into conformity with the Guidelines.

8 December 2021

HPC met with the OGNED team again to continue discussions. A two-foot notch was proposed between the hotel and the commercial section. (Note: this was agreed to in 2021, and not, as suggested in more recent documents, offered as a modification during discussions with the Township following the denial of a Certificate of Appropriateness to OGNED.)

13 April 2022

A detailed review of all outstanding non-conformities was prepared by HPC and shared with both the applicant and the Commission members.

19 April 2022

Applicants came before the full Commission to review their proposed project. (See attached notes.) Extensive public comment was offered: many attendees demanding OGNED be held to the Guidelines in the same manner as all other property owners in the Historic District.

8 June 2022

Applicants again came before the full Commission to continue review of their proposed project. HPC members voted unanimously to deny the applicant a Certificate of Appropriateness for failing to bring the project into conformity with the Architectural Design Guidelines.

Review of “updated plans” now before the Planning Board

The non-conforming elements of the applicant’s proposal were, and remain, substantial. They include many non-historical design components across all of the proposed buildings (i.e., the hotel, the commercial strip, Condo Building 1 and Condo Building 2). Such elements included non-historical roof forms and non-historic massing, historically inaccurate voids and projections (including modern inset balconies, peek-a-boo gable openings, etc.), parapet faux roofs, excessive fenestration using non-historic triple and double window sets, vast areas covered in faux cedar shakes, and an exaggerated use of exterior lighting, among many other aspects.

Despite many hours of meetings and repeated documentation by the HPC of the non-conforming elements, the applicant opted to bring the project before the full Commission without first resolving these issues.

During the review by the full Commission, which took place across multiple meetings over the span of a few weeks, the applicant was questioned about the remaining non-conformities. They showed little interest in abiding by the Guidelines that apply to all structures within the historic district.

Public comments received by the Commission during all of the meetings related to this project were overwhelmingly in opposition to permitting OGNED to move forward without it first being brought into conformity with the Guidelines.

In the end, the full Commission voted to deny the applicant a Certificate of Appropriateness due to the vast number of remaining non-conformities.

Subsequent to receiving this denial, the applicant did not avail themselves of the usual appeals process by bringing the matter before the Zoning Board of Adjustment. Instead, they negotiated directly with the Township on this matter. **HPC was neither consulted nor was involved in these negotiations.** The Commission was advised by the township that of the “102 non-conformities that had been identified, 98 of them had been resolved during the negotiations with the applicant.” No explanation was provided to HPC about how these numbers were arrived at nor what the word “resolved” meant in so far as it related to the Guidelines.

The applicant is now before the Planning Board in an attempt to have the original terms of the redevelopment plan changed (namely, the elimination of their need to obtain a Certificate of Appropriateness from the HPC) and to obtain permission to move forward with a plan that remains largely unchanged from the plan that was unanimously denied by the very Commission empaneled to review and advise on such matters.

An itemized review of the myriad outstanding non-conformities already exists in multiple forms. However, HPC would submit the following six images for close review. These images compare drawings submitted to (and subsequently denied by) the HPC, contrasted with the most recent elevation drawings submitted to the Planning Board for consideration.

The changes OGNED has made are minor and do not in any consequential way address the areas of concern that have, from the beginning, put this project at odds with the requirements of the Guidelines and historical precedence.

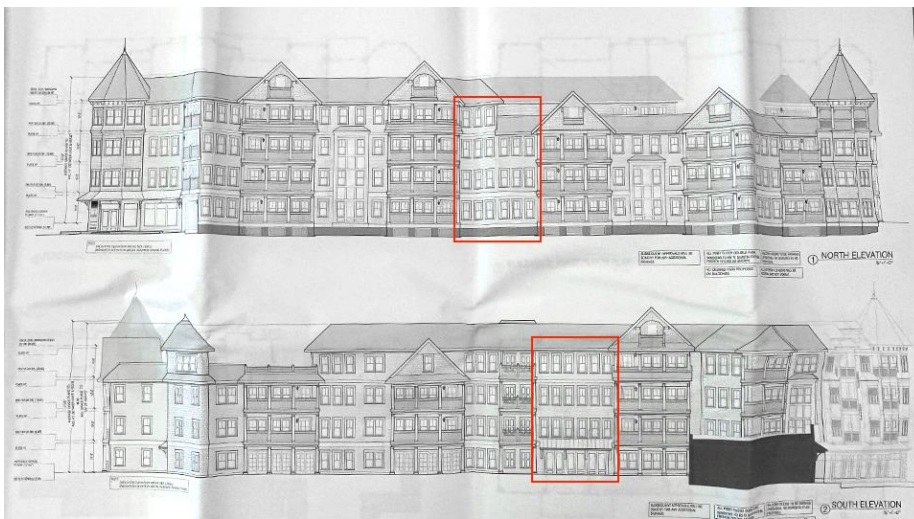
Ocean Grove is a nationally recognized cultural treasure. It is a one-of-a-kind example of 19th century urban planning and a veritable catalog of important American architectural examples. The development, as proposed, will result in a disfiguring intrusion on this historic cultural landmark - a community that has, for more than 150 years, been revered and appreciated for its scale, design, architectural importance, and cultural value.

We urge the Planning Board to deny OGNED’s attempts to have HPC removed from the process.

The community is relying on you to hear and respond to its deep and widespread concerns about the project in its current iteration. Ocean Grove deserves a development that respects and reflects its importance as a nationally recognized site.



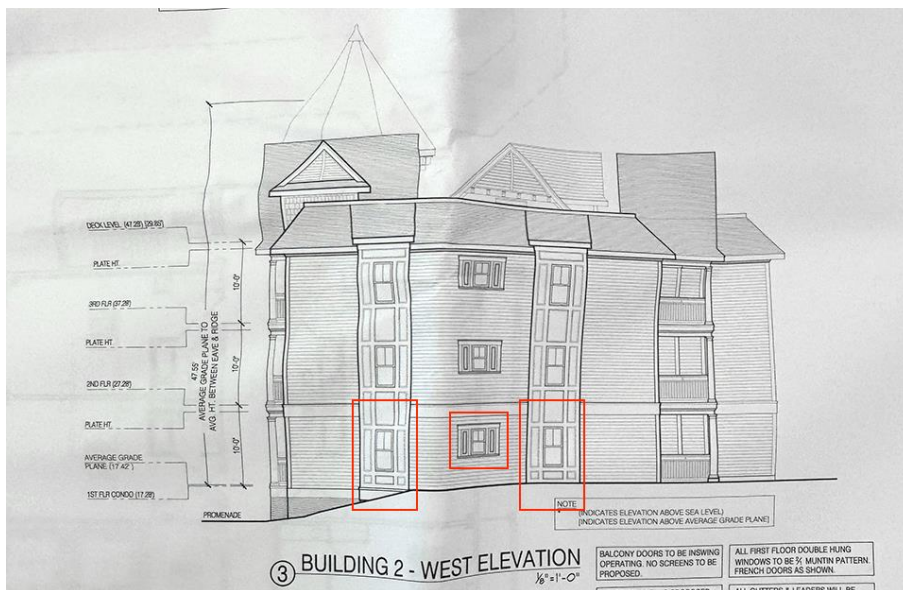
As denied by HPC: Condo Building 1, over-fenestrated in a manner that is non-historic and utilizing sets of triple windows. Triple windows, and the specific number of windows overall, is not consistent with historically appropriate designs. This over-fenestration occurs at both the north and south elevations.



As presented to the Planning Board: The plans submitted to the Planning Board illustrating Condo Building 1: the over fenestration remains but has been made worse and less conforming to the Guidelines. OGNED has eliminated the triple window sets but kept all the windows, creating **long courses of irregularly spaced single windows across multiple stories**. The proposed changes are more egregiously non-conforming than the original design unanimously denied by the Commission.



As denied by HPC: West-facing suspended protrusions (bay windows), terminate above the 1st floor.



As presented to the Planning Board: West-facing protrusions (bay windows), shown terminating “at grade.” In fact, this elevation sits above the open parking bay and thus the “suspended protrusions” remain, only now they are suspended above the opening to the parking garage.

Attachments:

- a. Neptune Township HPC Resolution Denying OGNED dated October 25, 2022
- b. Appendix A to Resolution of Denial, HPC Tech Notes dated April 13, 2022, amended June 6, 2022
- c. Amended Redevelopment Plan (ARP) for OGNED (with relevant sections highlighted by HPC)
- d. HPC Resolution authorizing actions before the Planning Board adopted October 8, 2024