



Ruthanne Fuller,
Mayor

Barney Heath,
Director
Planning & Development

Members:
Lizbeth Heyer, Chair
Mark Caggiano
Eliza Datta
Chuck Eisenberg
Ann Houston
Josephine McNeil
David Rockwell
Marva Serotkin
Albert Simmons

1000 Commonwealth Ave.
Newton, MA 02459
T 617/796-1120
F 617/796-1142

www.newtonma.gov

CITY OF NEWTON, MASSACHUSETTS

Newton Housing Partnership

June 26, 2022

Chairpersons Crossley and Doeringer
Newton Zoning and Planning Committee
Newton Planning Board
Newton City Hall, Newton, MA
02459

Dear Chairpersons Crossley and Doeringer

The Newton Housing Partnership appreciates your leadership and commitment to the zoning redesign process -- an unprecedented and powerful opportunity to create a zoning code that will make it possible to diversify and expand housing options, including housing that is more affordable than most options currently available in Newton. We are especially impressed with the comprehensive community engagement process you are conducting that has provided meaningful civic guidance as we consider the impact of changes to the zoning code, including how to best meet the expressed need for significantly more affordable housing while preserving the unique and diverse nature of our villages.

It has been fifty years since the original version of Chapter 40B passed the State Legislature and yet Newton still has not achieved 10% affordability. To help meet (and then exceed) this goal, there are three ways to develop more affordable and lower cost housing in Newton: 1) fund and build more subsidized housing – the best way to create deeply affordable housing for lower income earners, seniors living on fixed incomes and individuals and families living with special needs; 2) build more multi-family developments with inclusionary units – typically for low and moderate income households, and 3) increase the stock of smaller, lower cost housing options throughout the City via new zoning provisions. For Newton to significantly increase housing that lower income households can afford we must do all three of these things, and zoning reform is a critical tool for each one.

The Partnership is especially supportive of the City Council's current effort to create more as-of-right multi-family development opportunities in our village centers that will offer greater and more equitable social and economic opportunities for low- and middle-income households, especially given the access in these centers to transportation, jobs, and services. The scale and diversity of apartment types which this will facilitate will inherently provide the opportunity



Ruthanne Fuller,
Mayor

Barney Heath,
Director
Planning & Development

Members:
Lizbeth Heyer, Chair
Mark Caggiano
Eliza Datta
Chuck Eisenberg
Ann Houston
Josephine McNeil
David Rockwell
Marva Serotkin
Albert Simmons

1000 Commonwealth Ave.
Newton, MA 02459
T 617/796-1120
F 617/796-1142

www.newtonma.gov

CITY OF NEWTON, MASSACHUSETTS

Newton Housing Partnership

for a lower price point and help reduce the radical imbalance in supply and demand - a regional crisis that has driven up housing costs well beyond what most working families and retired people can afford. This supply driven affordability crisis is the primary motivation behind the state's recent Housing Choice legislation. The Partnership strongly encourages the City to comply with this important new law through the creation of sufficient dedicated as-of-right zoning districts near our village center transit hubs.

In addition to supporting expanded as-of-right zoning opportunities to create housing that is more plentiful and inherently more affordable, the Partnership believes that **the most powerful zoning tool to develop affordable housing for low and extremely low-income households is to adopt an affordable housing zoning overlay policy for developments with deed restrictions making some or all of their units affordable to these populations.** Providing this enhanced as-of-right zoning relief will make the expensive and risky process of permitting, funding and developing subsidized housing more predictable, less expensive and therefore more feasible. This will encourage the production of more affordable developments at scale - the quickest and most effective way to expand affordable housing options in Newton.

The Partnership thus strongly encourages the Council to include an affordable housing overlay policy alongside the 12 proposals under consideration for our village centers. We appreciate the opportunity to submit the following comments on these 12 proposals, specifically as they relate to supporting greater housing affordability, as well as to provide initial ideas for how to design an effective affordable housing overlay policy:

Proposed Affordable Housing Overlay Policy

We encourage the adoption of a zoning overlay policy that is city-wide (not restricted to specific districts or sites), with enhanced relief for affordable housing developments designed to lower per-unit costs (e.g. reduced parking space-per-unit requirements). The Partnership is currently studying the provisions and impacts of other overlay districts (such as the policy recently adopted in Somerville) and would appreciate the opportunity to propose specific guidelines for an overlay policy, which would include minimum affordability requirements, in the coming months.



Ruthanne Fuller,
Mayor

Barney Heath,
Director
Planning & Development

Members:
Lizbeth Heyer, Chair
Mark Caggiano
Eliza Datta
Chuck Eisenberg
Ann Houston
Josephine McNeil
David Rockwell
Marva Serotkin
Albert Simmons

1000 Commonwealth Ave.
Newton, MA 02459
T 617/796-1120
F 617/796-1142

www.newtonma.gov

CITY OF NEWTON, MASSACHUSETTS

Newton Housing Partnership

Concept 1: Reduce Parking Requirements

We support a lower residential parking requirement and encourage the Council to base the requirement on utilization data for recent village center developments which, based on recent studies, we believe to be between 0.5 and 0.8 (lower than the 1-to-1 ratio currently proposed). We also encourage the Council to consider a parking requirement of less than 1 per unit for smaller scale projects, which would enhance the feasibility of development on infill sites which are common in our villages, particularly sites closest to transit. Shared parking arrangements as well as creation of centralized parking facilities should also be considered.

For additional guidance we encourage the Council to consult the Metropolitan Area Planning Council's (MAPC) recent Perfect Fit study (<https://perfectfitparking.mapc.org/>) whose findings support lower parking requirements near transit. MAPC's study surveyed parking lot usage at 200 market-rate, affordable and mixed-income multifamily developments in Boston's Inner Core subregion, which includes Boston and 20 surrounding cities and towns. The measurements were taken late in the evening, to capture parking lot usage at peak parking hours. The study concluded that *"The amount of parking provided varied widely, ranging from 0.25 to 2.0 spaces per unit. The average was exactly 1.0 parking space per unit. Yet it appeared that residents didn't need that much parking, because the garages and lots we visited were rarely full, and many had ample empty parking. In the vast majority of developments we studied, the average parking use was less than one space per household, and across the entire sample, only 70 percent of the available spaces were full when surveyed. In affordable housing developments (sites where 50 percent or more of the apartments are deed restricted) demand was even lower: only 0.55 cars were parked per household."*

Concept 2: Increase Floor to Floor Heights

While this provision does not directly affect housing affordability, it does facilitate commercial development which creates vibrancy in our villages, and could add to project feasibility, an indirect benefit for the affordable housing component of a mixed-use project. We support this provision.

Concept 3: Set Design Requirements for Half Stories

We support this concept which would facilitate greater scale (inherently more cost effective) without the appearance of more bulk and/or height. In addition to setbacks and sloped roofs, mansard roofs should also be considered.



Ruthanne Fuller,
Mayor

Barney Heath,
Director
Planning & Development

Members:
Lizbeth Heyer, Chair
Mark Caggiano
Eliza Datta
Chuck Eisenberg
Ann Houston
Josephine McNeil
David Rockwell
Marva Serotkin
Albert Simmons

1000 Commonwealth Ave.
Newton, MA 02459
T 617/796-1120
F 617/796-1142

www.newtonma.gov

CITY OF NEWTON, MASSACHUSETTS

Newton Housing Partnership

Concept 4: Eliminate Lot Area Per Unit Minimums

We support this concept which would lead to more efficient and affordable scale as well as more climate wise construction.

Concept 5: Remove Minimum Lot Sizes

We support this concept which will incentivize more diverse development on smaller lots which are common in our villages.

Concept 6: Set a Maximum Building Footprint

As a standalone provision, we have a concern that this would unduly restrict scale and inhibit the production of affordable housing developments that may be larger than existing land uses but still contextually appropriate in village centers. However, if adopted together with other provisions that support greater density within contextual forms, this provision could be acceptable.

Concept 7: Replace 20,000 sf of Floor Area Special Permit with Special Permit for Development on Parcels Greater than 3/4 Acre

We support the effort underlying this proposal to facilitate effective planning on larger sites, which are precious resources for our city's future. However, similar to our comment regarding Concept 6, we believe this provision must be considered as one component of a more comprehensive village center approach. As part of this consideration, we encourage careful study of the ¾ acre provision and encourage a proposed lot size maximum that doesn't overly restrict appropriate as-of-right opportunities for larger projects based on existing typical lot sizes. We believe the additional design review requirements under Concepts 8 and 9 will enhance the ability to discover creative design mitigations enabling larger project sizes to be built on these larger sites that do not disrupt the character of the village center setting.

Concepts 8 and 9: Site Plan Review, Design Review and Design Requirements

We support the concept of site plan and design review that result in adherence to clear standards, goals and principles, but we cannot definitively comment on these concepts until the specific project size thresholds are identified. We strongly encourage a process that is tightly managed with requirements that are clearly prescribed (with a practical/technical focus, not subjective or aesthetic), so as not to add time and complexity that would ultimately drive up costs.



Ruthanne Fuller,
Mayor

Barney Heath,
Director
Planning & Development

Members:
Lizbeth Heyer, Chair
Mark Caggiano
Eliza Datta
Chuck Eisenberg
Ann Houston
Josephine McNeil
David Rockwell
Marva Serotkin
Albert Simmons

1000 Commonwealth Ave.
Newton, MA 02459
T 617/796-1120
F 617/796-1142

www.newtonma.gov

CITY OF NEWTON, MASSACHUSETTS

Newton Housing Partnership

Concepts 10, 11 and 12: Revise MU4, BU3 and BU2 Dimensional Standards

We support an expansion of allowable dimensional parameters to the greatest extent possible within reason based on existing context, but strongly grounded in the goals for expanded supply (especially of smaller units) and associated lower price points. We are concerned that the maximum allowable stories within each district re: Special Permit requirements may be too low (per good design and planning), and so we encourage more study of these thresholds for each district so as not to overly restrict as of right development and prevent us from meeting Housing Choice production goals.

These 12 concepts, if well-coordinated and designed to appropriately maximize as-of-right opportunities, together with adoption of an affordable housing overlay policy, will enhance housing affordability in the City of Newton by increasing the overall stock, allowing for smaller, less expensive housing units and creating more subsidized developments. They will also encourage housing that is lower cost to be dispersed throughout the City rather than concentrated in a few locations.

Especially as Newton's housing prices continue to escalate while the need for housing that is inclusive and affordable to all is unprecedented, we urge you to adopt changes to the zoning code that will support a measured but meaningful increase to our affordable housing supply. Thank you for the opportunity to comment and the Partnership looks forward to continuing our involvement throughout the mapping and draft stages of the village center rezoning process.

Thank you for your consideration,

Lizbeth Heyer, Newton Housing Partnership Chair

Cc.
Mayor Fuller
President Albright
Newton City Council
Newton Planning Board
Barney Heath

