

November 18, 2013

Mr. Jon Schneider
Zoning Board of Appeals
Town of Needham
500 Dedham Avenue
Needham, MA 02492

Reference: Needham Mews Comprehensive Permit

Dear Mr. Schneider:

Per your request, RKG Associates, Inc., has reviewed the proposed Chapter 40B development known as "Needham Mews," a 268-unit apartment community proposed for a 6.02-acre site on Greendale Avenue. RKG was asked to examine a sample of mixed-income, multi-family rental developments in the Boston metro area and provide a comparison analysis of gross density and open space and recreation amenities. After the public hearing on October 21, 2013, you asked us to add zoning district information to the projects we identified in our draft report (dated October 16, 2013). Per your request, we are providing a revised report.

Should you have any questions, please don't hesitate to contact me at (617) 455-8641 or by email at jbarrett@rkassociates.com.

Sincerely,



Judi Barrett
Director of Municipal Services

Needham Mews

As requested by the Needham Zoning Board of Appeals (“Board”), RKG Associates, Inc., has reviewed the proposed Needham Mews apartment development and collected data for a regional comparison analysis of gross density and open space and recreation amenities. The Board wanted to know if the density of Needham Mews is comparable to that of other recently built mixed-income apartment developments in the Boston area and whether the project offers similar outdoor recreation facilities. In addition, the Board requested information about the zoning designation for sites developed under a comprehensive permit.

RKG has obtained density data for a sample of twenty-three suburban apartment communities, zoning district designations for all but one project, and recreation data for a limited number of these developments. The table attached to the end of this memo summarizes the density and zoning information and identifies our sources. Not all of the communities in our sample are comparable to Needham, but in our opinion, the following are useful comparison towns because they have very similar demographic characteristics (e.g., social and economic profiles, household sizes and composition, and household wealth), proximity to regional employment centers, and highly respected public schools:

- Acton
- Andover
- Concord
- Hingham
- Hopkinton
- Lexington
- Westborough

Arguably, Newton shares some qualities in common with Needham, too, which is why we included it in our sample. However, we do not consider it as comparable as the above-listed towns. Newton’s population of 86,307 is nearly three times the population of Needham (28,911). In addition, Newton operates under a city form of government, and its development pattern is quite different from that of Needham, especially in terms of land devoted to nonresidential and institutional uses. Nevertheless, it is adjacent to Needham and many may feel that proximity alone makes Newton a good comparable. We leave that to the Board to decide.

Table 1 shows significant differences in density for the developments in our study. The fact that one apartment development may have been constructed at an exceptionally low density does not mean all rental housing developments would be feasible at the same density. As the Board knows from Needham’s own experience with Chapter 40B, the sites chosen for comprehensive permit developments tend to be problematic, e.g., extensive wetlands, steep slopes, land unsuitable or unmarketable for the purposes for which it is zoned, and so on. Accordingly, a given parcel may be large in total area but have only a small portion that is actually buildable. That is the case for developments such as Rolling Green in Andover and Flanders Hill in Westborough. Nevertheless, the average density in

our sample, not including the highest (Charles River Landing) and lowest (Residences at Stevens Pond) in range, is 14.3 units per acre. The sample midpoint is 11 units per acre.

The higher-density developments in our sample have some noteworthy characteristics that the Board may wish to consider. For example:

- Windsor at Oak Grove straddles the Melrose-Malden city line, with nearby and walkable access to the Oak Grove T Station and direct access to MBTA bus service. Over 75 percent of the project lies within Melrose. The entire project was developed at an average density of approximately 25 units per acre. Like most apartment developments, Windsor at Oak Grove also has a conventional community building and an outdoor pool. In addition, the apartment buildings are connected by a network of curved walkways and informal and formal (landscaped) open spaces, including areas designed for outdoor leisure use.
- Avalon at Newton Highlands is prominently located on a major street in Newton. Abutting and nearby land uses include the Newton Technology Park, offices, retail stores, and restaurant space. The project has direct access to MBTA bus service. The closest ramp to Route 95 is approximately one mile away. Onsite amenities include both indoor facilities (community building, fitness center) and outdoor facilities, such as landscaped open space throughout the site, a picnic area, a pool, and an outdoor sports court.
- Charles River Landing is located on Second Avenue in a redeveloping office/industrial park, with goods and services nearby on Highland Avenue. It has very little open space – mainly two courtyards, including one with an outdoor pool, and a park feature on the south side of the building where Second and Fourth Avenues converge. This development directly abuts open space along the Charles River. This project was developed under a Local Initiative Program (LIP) comprehensive permit, with pre-permit negotiations between the proponent and the Needham Board of Selectmen.
- Watertown Mews is located on Pleasant Street in Watertown. Mill Creek Residential developed Phase II of a two-phase project known as Repton Place, which was originally permitted by Beacon Communities. Together, Phases I and II include 385 units on 14.7 acres, or a project-wide average of 26.2 units per acre. Phase I is a condominium development; Phase II, apartments. Several years ago, Watertown commissioned a master plan for the Pleasant Street corridor, recognizing that this post-industrial area – from Myrtle Street to the Waltham line – was gradually transitioning to a residential mixed-use neighborhood. Since completing the corridor plan, Watertown has approved over 650 new multifamily units along Pleasant Street and the adjacent side streets. At least two established MBTA bus lines run along Pleasant Street, with one stop directly in front of Repton Place/Watertown Mews.
- Avalon at Hingham Shipyard is a transit-adjacent development in a mixed-use area in the Hingham Shipyard. The residents have access to more than one public transportation option – MBTA bus lines and commuter boat service – and a wide



variety of goods and services. The vicinity of the shipyard has attracted considerable investment in new retail and commercial space in the past several years. These amenities are within easy walking distance of AvalonBay's apartment development. As we understand it, Avalon at Hingham Shipyard does not have many outdoor recreation facilities. It has customary features such as an outdoor pool, a grill and landscaped picnic areas.

Our sample includes three apartment developments that were built without need for a comprehensive permit. They include Alta Legacy Farms in Hopkinton, Madison Place in Shrewsbury, and Watertown Mews. As we understand it, Alta Legacy Farms is the only one in which 25 percent of the apartments are affordable to low- or moderate-income households, thereby making the entire project eligible for the Chapter 40B Subsidized Housing Inventory (SHI).

By memo dated October 17, 2013, the applicant's counsel, Goulston & Storrs, provided the Board with additional density information for these and other comprehensive permit developments. In several cases, the density calculations from Goulston & Storrs differ from ours. We would like to work with Goulston & Storrs to resolve these differences. Kindly advise whether the Board wants us to do so.



Table 1. Gross Density of Recent Apartment Developments in Boston-Area Suburbs

Town	Development	Total Units	Site (Acres)	Gross Density	Zoning	Source
Needham	Needham Mews	268	6.0	44.5	SF Residential	Town Planner
Acton	Avalon Acton	360	35.0	10.3	Office Park 1 & 2	Consultant's Files
Andover	Rolling Green	224	45.3	4.9	Single Residence C; Watershed Overlay	Consultant's Files
Braintree	Ridge at Blue Hills	186	17.1	10.9	Open Space/Conservancy	Online Assessor's Data
Burlington	Arborpoint at Seven Springs	331	37.8	8.8	Planned Development	Online Assessor's Data
Concord	Concord Mews	350	30.0	11.7	Industrial	Online Assessor's Data
Foxborough	The Lodge at Foxborough	250	22.8	11.0	Industrial	Consultant's Files
Hingham	Avalon at Hingham Shipyard	235	9.9	23.6	Industrial Park	Consultant's Files
Hopkinton	Alta Legacy Farms*	240	18.2	13.2	Single Res.; MU Overlay	Town Planner
Lexington	Avalon at Lexington Hills	387	22.1	17.5	Planned Commercial Development (CD)	Online Assessor's Data
Lexington	Avalon at Lexington	198	16.9	11.7	One-Family Dwelling (RO)	Online Assessor's Data
Melrose	Windsor at Oak Grove	401	16.0	25.1	Extensive Business (BB1)	Online Assessor's Data
Needham	Charles River Landing	350	7.9	44.1	NEBC	Consultant's Files
Newton	Avalon at Newton Highlands	294	7.8	37.7	Mixed Use	Online Assessor's Data
Newton	Arborpoint at Woodland Station	180	8.8	20.3	Business 1 (BU1)	Online Assessor's Data
Northborough	Avalon Northborough	382	42.0	9.1	Industrial	Online Assessor's Data
Pembroke	Pembroke Woods (Alexan)	240	51.0	4.7	Industrial	Online Assessor's Data
Saugus	Residences at Stevens Pond	326	82.6	3.9	Not Available	Online Assessor's Data
Shrewsbury	Madison Place*	96	12.0	8.0	Multifamily	Town Planner
Shrewsbury	Avalon Shrewsbury	251	23.6	10.6	Limited Industrial	Online Assessor's Data
Stoughton	Lodge at Stoughton	240	13.1	18.3	Commercial	Online Assessor's Data
Tewksbury	Lodge at Ames Pond	364	52.7	6.9	Industrial/Office	Town Planner
Watertown	Watertown Mews**	206	6.5	31.7	Mixed Use	Town Planner
Westborough	Flanders Hill at Westborough	280	62.0	4.5	Industrial	Online Assessor's Data Online

*Inclusionary zoning, not a Chapter 40B comprehensive permit.

**Watertown Mews is Phase II of a larger housing project on Pleasant Street.

General Note: Zoning districts listed in Table 1 are primarily the primary zoning designations as reported by the assessor's office and confirmed, wherever possible, by a review of the Zoning Map. There may also be overlay districts that control development on all or portions of each site. Every effort was made to identify all applicable districts, including overlays.