



South Hadley Housing Production Plan

2016

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Acknowledgements

South Hadley Housing Technical Advisory Group

Jeff Squire, South Hadley Planning Board (Chair)
Mark Cavanaugh, South Hadley Planning Board (Vice-Chair)
Joan Rosner, South Hadley Planning Board (Financial Secretary)
Brad Hutchinson, South Hadley Planning Board
Melissa O'Brien, South Hadley Planning Board
Dan Dodge, South Hadley Planning Board (Associate Member)

South Hadley Planning Department

Richard Harris, AICP, Town Planner

Pioneer Valley Planning Commission

Shawn Rairigh, Senior Planner
Larry Smith, Senior Planner

This Plan was prepared according to the requirements of the state's Housing Production Program (HPP), which is a program administered by DHCD and authorized by Massachusetts Chapter 40B to encourage communities to take a proactive approach to affordable housing development and to meeting their 10% affordable housing goal. This HPP is valid for a five year period from the approval date by DHCD. Upon expiration, this HPP may be renewed.

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EXECUTIVE SUMMARY

The Town of South Hadley seeks to assure that safe, high quality homes are available and affordable to people of all economic means. This housing production plan presents data, analysis, and recommended actions to achieve this goal while sustaining the character of South Hadley.

As of 2014, there are 7,091 year-round housing units in South Hadley. Of these, 396 units (5.6%) are considered affordable to individuals and families earning up to 80% of the area median income (AMI) for the region (\$65,800 per year for a family of four in 2015). South Hadley needs to add another 313 affordable homes to reach the 10% affordable housing goal established by the Massachusetts Comprehensive Permit Law of 1969 Chapter 40B.

South Hadley currently offers a variety of rental and homeownership options, many of which are affordable to individuals and families of varying economic means. However, housing affordability in the coming years will continue to be challenged by an overall shortage of housing production in Massachusetts, along with increasing market demand for homes in places like South Hadley.

To address these challenges, this Housing Production Plan has been produced with the guidance and input of the South Hadley Planning Board, and input from technical advisors and community residents. It builds off the findings and strategies discussed in the Town’s 2010 Master Plan, and recent creation of a 40R Smart Growth Zoning Overlay District in South Hadley Falls. In addition, the plan is intended to provide information and resources that will support continued discussion and action on housing needs.

The plan finds the following challenges to the housing market are most important to address:

- Challenge 1: multifamily to meet need for the 3 affordable-eligible categories (80%, 50% and 30% of AMI)
- Challenge 2: rental? _____
- Challenge 3: starter homes? _____

The plan considers a wide range of options to address these fundamental housing market challenges. Of these, the following **XX** actions have been ranked by the Planning Board and stakeholders as having the highest priority, based on their effectiveness:

1. Action.
2. Action
3. Action.
4. Action.
5. Action.
6. Action.
7. Action.
8. Action – up to ~20 actions.

1. INTRODUCTION

1.1 Background

Historically, rental and ownership housing in South Hadley has been considered affordable for most residents, but this has begun to change in recent years as two larger national trends collide: the costs of housing have been increasing rapidly while household income has not. Many factors contribute to the price of housing – household growth and historically low interest rates increase housing demand, while increased material costs, building code requirements, predatory lending practices, increased assessed value, and increasing HOA and utility fees work to increase housing costs. Meanwhile, local zoning laws that favor larger and more expensive homes, NIMBYism, Federal financing policies, and other considerations limit housing production, especially for housing types that are now experiencing increased demand. On the income side, national economic shifts that have dampened wage growth are exacerbated by an increase in single-breadwinner households, fixed-income households, and disabled persons. At the same time, increasing costs associated with transportation, food, healthcare, and other necessities compete for household income.

The result: in attractive places, new homes, and to lesser extent older homes, have seen a tremendous rise in their sales and rental prices. Certainly South Hadley and most other Pioneer Valley towns have been spared the full strength of these trends, but the fact remains that housing in the town is becoming unaffordable for a growing number of residents. Indeed, one-third of residents responding to a survey conducted for this plan said they probably could not afford to buy the home they live in at its current market value. Children who grew up in the community are now facing the possibility that they may not be able to stay and raise their own families locally. Long-term residents, especially the elderly, are finding they are less able to maintain their homes and keep up with increased expenses, but are pressed to find alternative housing that better meets their current life styles. Families are finding it more difficult to “buy up,” purchasing larger homes as their families grow or move from rentals to homeownership. Lower-wage workers or people with disabilities who are squeezed-out of the private housing market are particularly burdened and are ever more reliant on subsidized housing. Waiting lists of 10 years or more for South Hadley’s public housing units have become standard.

1.2 Defining Affordable Housing

The U.S. Department of Housing and Urban Development (HUD) and Massachusetts’ Department of Housing and Community Development (DHCD) consider housing “affordable” if a household pays no more than 30% of their total income on mortgage or rent, utilities, insurance, taxes, HOA fees, and related costs. Households that pay more than 30% of their total income for housing can be considered “cost-burdened” and may have difficulty affording every day necessities, such as food, clothing, transportation, and medical care. A household paying between 30% to 50% of their income for housing

is considered to be “moderately cost-burdened”; households paying more than 50% of their income on housing are considered “severely cost-burdened.”

Since very wealthy households may spend a large percentage of income on housing yet have plenty of income left for necessities, HUD and DHCD also take into account a household’s income in relation to regional norms. The Area Median Income (AMI) is calculated from the US Census’ American Community Survey each year, and measures the median family income of a Metropolitan Statistical Area (MSA) – that is, half the households in the MSA earn more, half earn less. South Hadley is within the Springfield MSA, which includes Hampden and Hampshire Counties. The Springfield AMI in 2015 is **\$68,200**.

From the AMI, income benchmarks are derived based on family size (e.g. Income limits for a family of one are significantly lower than those for a family of four) and used to determine eligibility for federal and state housing programs. The three most commonly used affordable housing benchmarks are:

- Low Income (LI) – 80% or less of Area Median Income (AMI).
- Very Low Income (VLI) – 50% or less of AMI
- Extremely Low Income (ELI) – 30% or less of AMI

In some “high cost” MSAs, additional calculation are completed based on average rents. The Springfield MSA is not considered “high cost.”

FY2015 Benchmark Income Limits for Springfield MSA. AMI = \$68,200

Family Size	1-person	2-person	3-person	4-person	5-person	6-person
Low Income: 80% AMI	\$46,000	\$52,600	\$59,150	\$65,700	\$71,000	\$76,250
Very Low Income: 50% AMI	\$29,150	\$33,300	\$37,450	\$41,600	\$44,950	\$48,300
Extremely Low Income: 30% AMI	\$17,500	\$20,000	\$22,500	\$24,950	\$28,440	\$32,580

Source: U.S. Department of Housing and Urban Development

Affordable housing in Massachusetts usually refers to **housing that is reserved for households with incomes at or below 80% of the area median income**. This is because the 80% benchmark is one of the criteria for a housing unit to be listed on DHCD’s Subsidized Housing Inventory (SHI), which is the official list of affordable housing that counts towards a municipality’s requirements under the Massachusetts Comprehensive Permit Law, or MGL Chapter 40B as it is coded. As shown above, in FY2015 the 80% of AMI threshold for the Springfield area was \$65,700 for a family of four.

1.3 MGL Chapter 40B, the SHI, and Housing Production Plans

Contemporary governmental response to housing affordability has tended to promote the increase of housing supply, usually by two means: reducing barriers to private housing production and subsidization of income-restricted housing units. The Massachusetts Comprehensive Permit Law of 1969 (the first of its kind in the country, also known as MGL Chapter 40B), sets a goal for each of the Commonwealth's cities and towns to ensure at least 10% of homes within their boundaries qualify as affordable. DHCD maintains a Subsidized Housing Inventory (SHI), updated annually, which records the number of qualifying affordable housing units in each town and its portion of the year-round housing stock.

To qualify for the SHI, housing units must meet several criteria:

- Units must be rented or sold to individuals or families who earn 80% or less of the area median income for the region in which the municipality is located.
- Sale prices or rents must be set so monthly housing costs (rent or mortgage, PMI, taxes, insurance, HOA fees, utilities) does not exceed 30% of monthly income for an individual or family earning 80% of area median income (AMI). This varies by household size, unit size, and the income levels in the chart above.
- The income qualification must be recorded on the deed, for a period of 15 years for rehabilitated housing and 30 years for newly created units. The deed restriction defines maximum permissible resale prices or subsequent rental prices.
- Units must be rented or sold according to state-approved affirmative fair marketing standards.
- Buyers face qualifications concerning income, including limited assets (\$275,000 for age-restricted buyers; \$75,000 for non-age restricted)
- 10% or more of the units in a development must have at least 3 bedrooms. Age-restricted, assisted living, and other specialty developments are exempt, and DHCD may waive the requirement for small projects (under 10 units), or if it renders a project infeasible.
- In a market-rate rental or assisted living development, if at least 25% of units are reserved for 80% AMI individuals or families or if at least 20% are reserved for 50% AMI individuals or families, then ALL of the units in the development are eligible. This is to encourage minimally-subsidized market rate projects as a means for creating affordable housing.

In communities that have not achieved Chapter 40B's 10% affordability threshold, residential developers who propose new projects that will create affordable housing are entitled to receive a single comprehensive permit from the local zoning board of appeals, effectively overriding local location, density, and other standards. Communities that have met and maintain the 10% goal are not subject to the comprehensive permit acceptance requirement.

As of 2014, there were 7,091 year-round housing units in South Hadley, of which 396 units (5.6%) were listed on the SHI. Thus, another 313 SHI-listed housing units are needed to reach the 10% affordable housing goal established by Chapter 40B.

South Hadley SHI-Listed Housing Units, 2016

DHCD Id #	Name	Address	Type	SHI Units	Expires	Comp. Permit?	Subsidizing Agency
2853	Lathrop Village	69 Lathrop St.	Rental	48	Perp.	No	DHCD
2854	Lathrop Village	69 Lathrop St.	Rental	48	Perp.	No	DHCD
2855	Newton Manor	643 Newton St.	Rental	40	Perp.	No	DHCD
2856	n/a	27 Abbey Lane	Rental	8	Perp.	Yes	DHCD
2857	Abbey St.	Abbey St.	Rental	12	Perp.	Yes	DHCD
2858	Hampshire Cty RHA	North St.	Rental	2	Perp.	No	DHCD
2859	Riverboat Village	River Lodge Rd.	Rental	170	Perp.	Yes	DHCD
4460	DDS Group Homes	Confidential	Rental	24	N/A	No	DDS
9144	Hubert Place	93 Canal St.	Rental	44	2048	No	HUD, DHCD
Total SHI Units in South Hadley				396	5.58% of housing stock		

Source: DHCD

To help communities meet the 10% goal and be proactive in the development of affordable housing, Chapter 40B encourages municipalities to prepare Housing Production Plans (HPP). This a specific type of plan authorized by the legislation and administered by DHCD. Implementation of an HPP can relieve the municipality of the obligation to issue a comprehensive permit to developers of residential projects, provided that the HPP is 1) approved by DHCD and 2) the number of affordable units in the town are increased by at least 0.5% of total housing stock each year and documented by DHCD in an annual certification of compliance. **In South Hadley, production of at least 36 units of SHI-listed affordable housing production each year is necessary for compliance.**

Municipalities with DHCD-approved HPPs receive preference over non-HPP communities for certain state grant funds. Additionally, if a community is certified compliant, decisions made by the Zoning Board of Appeals to deny a comprehensive permit will be deemed consistent with Local Needs under Chapter 40B by the state’s Housing Appeals Committee, and will be upheld as a matter of law.

1.4 Plan Components and Process

DHCD has published guidelines for developing Housing Production Plans (HPP). These essentially require communities to: 1) Complete a comprehensive housing needs assessment that takes into consideration both local and regional housing needs and identifies opportunities and constraints to meeting needs; and 2) Develop strategies to enable it to meet its affordable housing needs, including an explanation of how constraints will be mitigated. The Plan must show how the community will meet its annual affordable housing production goal (creation of affordable units equaling or surpassing .5% of year-round housing stock).

South Hadley's Housing Production Plan presents data to help better understand the housing needs of the Town and offers a program of actions that are geared toward achieving the annual progress goal and ultimate 10% affordable housing goal. The plan is organized into the following chapters:

- Chapter 1: Introduction (context and applicable laws and regulations).
- Chapter 2: Housing Needs Assessment (demographics and housing stock over time).
- Chapter 3: Housing Market Conditions (review of opportunities and constraints to housing development).
- Chapter 4: Action Plan (recommendations to improve affordable home development that addresses the Town's housing needs).

To develop the Plan, the Town contracted with the Pioneer Valley Planning Commission (PVPC). The Town's Planning Board, with support from the Town Planner, served as the reviewing body for the HPP.

PVPC began work on the plan in July 2015. A community survey was conducted from October 10 through November 15. Public presentations and conversations were conducted with the South Hadley Planning Board on the following dates:

- May 23, 2016 – Findings of Chapter 40B, and demographic and housing statistics research. Approximately 10 people attended the community meeting.
- June 16, 2016 – Discussion of affordable housing goals, constraints to housing production, and potential locations for housing development. Approximately 15 people attended the community meeting.
- June 27, 2016 – Discussion of constraint mitigation and potential means to increase affordable housing production. Approximately 10 people attended the community meeting.

A draft plan was submitted to the Planning Board for review on **DATE, 2016**. A general community meeting to review the plan was held on **DATE, 2016**. Approximately **XX** people attended the community meeting. The final HPP will need to be approved locally by the South Hadley Planning Board and South Hadley Select Board before it can be **accepted** by DHCD as a valid HPP. To receive the annual "appeal-proof" protection from the Chapter 40B comprehensive permit, DHCD must **approve** the HPP by verifying that South Hadley's annual affordable housing unit production goal is met each year.

1.5 Data Sources and Method

Data for this report was gathered from a variety of available sources including: the U.S. Census Bureau (1990, 2000, 2010 U.S. Decennial Census and the 2007-2011, 2010-2014 American Community Survey); the Warren Group Real Estate and Financial Information; Massachusetts Department of Housing and Community Development; Massachusetts Department of Employment and Training; Massachusetts Department of Revenue; and Massachusetts Department of Education.

Local resources included: South Hadley Assessor's Office; South Hadley Department of Public Works; South Hadley Public Schools; and South Hadley Conservation Commission. State and regional resources included: the Pioneer Valley Planning Commission (PVPC); Citizens Housing and Planning Association (CHAPA), Massachusetts Housing Partnership (MHP), Massachusetts Community Preservation Act Coalition, and **HAPHousing**.

The following four plans were consulted in detail and provided significant context and guidance for the development of this plan.

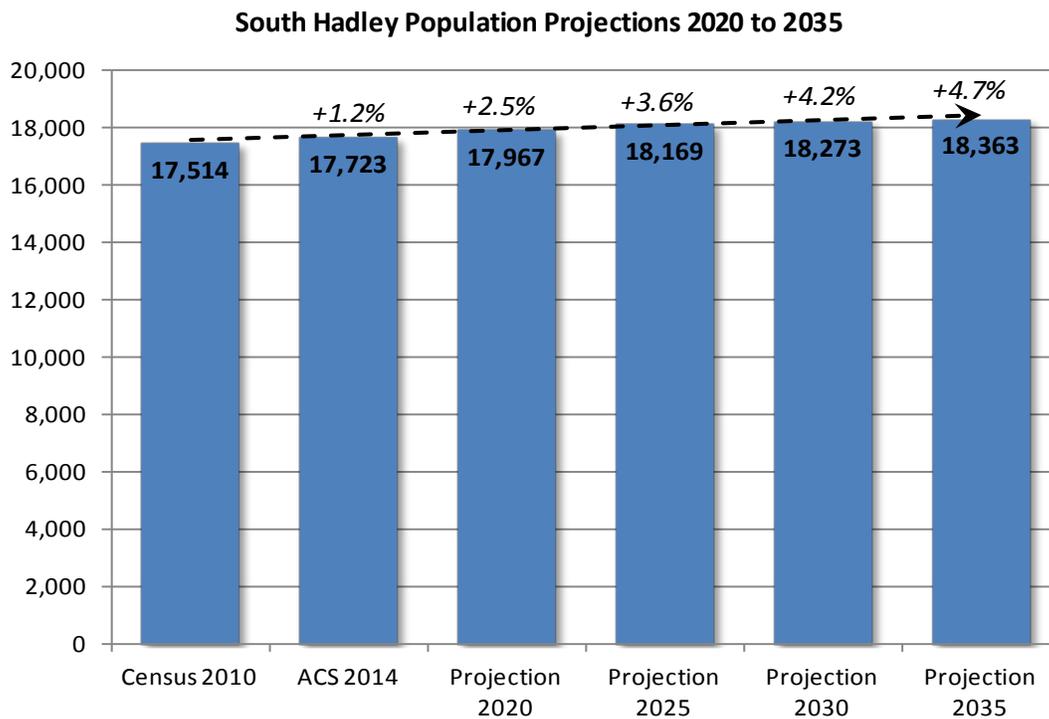
- South Hadley Master Plan (2010)
- South Hadley Open Space and Recreation Plan (2012-2019)
- Pioneer Valley Regional Housing Plan (2014)
- Fair Housing and Equity Assessment for the Knowledge Corridor (2014)

2. HOUSING NEEDS ASSESSMENT

This chapter presents a housing needs assessment for South Hadley – an overview of demographic and housing characteristics and trends that provide the context within which strategies can be developed set and meet affordable housing goals.

2.1 Population and Household Trends

The 2014 American Community Survey (produced by the US Census) estimates a population of 17,723 people live in South Hadley. This is a 1.2% increase since the 2010 Census. While that growth rate remains higher than many other Pioneer Valley towns, it is nowhere near the rapid population increases seen in the heyday of suburbanization following 1950. Population models anticipate continued low level increases going forward, similar to most Valley towns but far below statewide or national growth rates.



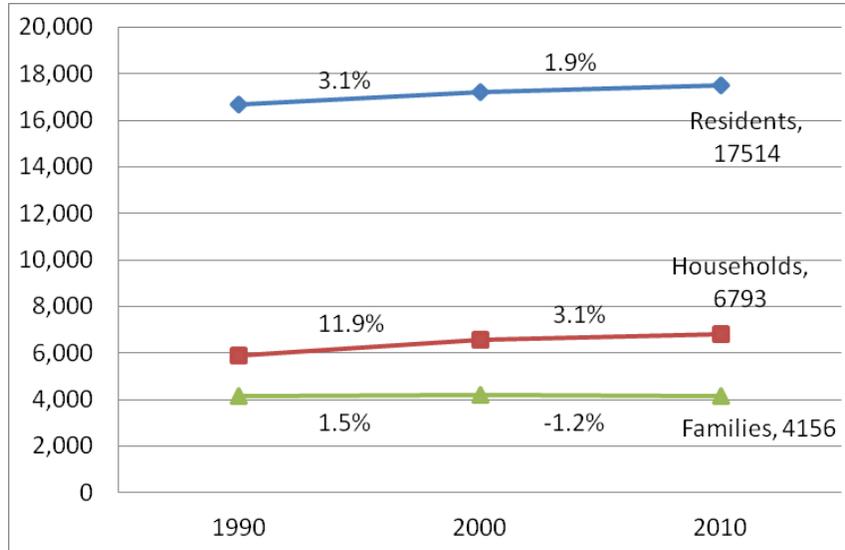
*Source: Long-Term Population Projections for Mass. Regions and Municipalities.
Henry Renski, Susan Strate. UMass Donahue Institute, March 2015.*

Several broad demographic changes affecting the region will influence local housing markets over the coming decades. Each of these is discussed in detail below.

Trend 1: The number of households is increasing more rapidly than population.

Like most communities in the Pioneer Valley region, the number of households in South Hadley has increased at a faster rate than the number of people from 1990 to 2010, reflecting a trend of smaller households. The number of people living in a housing unit (a household) has been declining for decades in the U.S. as more people live alone, have no children, have fewer children, or divorce.

South Hadley Population, Households, Families, 1990-2010



Source: US Census Bureau.

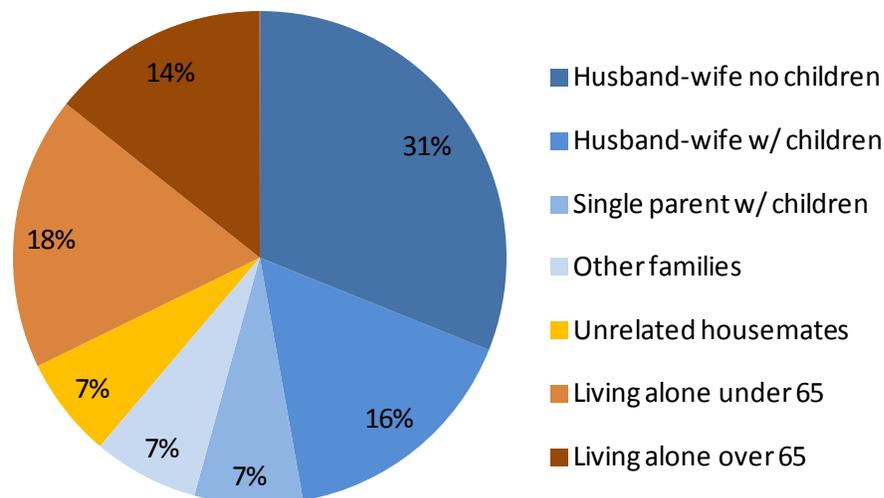
In South Hadley, several age-restricted senior housing developments and smaller college-housing developments were built in the 1990s and 2000s, which resulted in more households with smaller-than-average household sizes. Diving deeper, we see changes taking place in the types of households – these are important to understand, since housing needs are closely related to household typology.

Trend 2: The types of households are shifting as the number of households with children decrease and the number of people living alone increases.

South Hadley has seen a decrease in the number of households with children in the last decade, decreasing 8% to become less than a quarter of all households in the town. This accompanies a general decrease in the size of families as well, as people have fewer children, later in life. In particular, the number of 2-parent families with children dropped significantly (-16.8%), and now constitute only 16% of all households. (Families are defined by the Census Bureau as a householder and one or more other persons who are related by birth, marriage or adoption). Families with a single parent head of household increased 11.6%, such that single parents now constitute 26% of all households with children. Three-quarters of single-parent families are female-headed.

This is not an uncommon trend in suburban towns of the Pioneer Valley, and it will have ramifications on housing demand as fewer households make location decisions based on schools or other child-centric amenities and those towns with a large portion of housing stock geared towards ‘traditional’ large families compete for a decreasing share of those families. Moreover, single-parent households more regularly encounter difficulty affording a place that is safe with enough bedrooms and living space because there is usually only one income to support the family. An estimated three-fourths of all families led by a single parent in Massachusetts do not earn enough money to make ends meet, according to a 2013 study by the Crittenton Women’s Union. That study found that a single parent living in Massachusetts needs to earn \$65,880 a year to pay for food, housing, child care, health care and other basic needs for one school-aged child and another in preschool. While South Hadley has fewer single-parent households than both the region and the state, we can expect increased demand for cheaper and shorter-term housing. It should be noted that families with children are a protected class under federal law, and Massachusetts has made it unlawful to discriminate based on marital status.

South Hadley Households by Type, 2010



Source: US Census

Another key trend is the increase in people living alone, which rose by 10.5% for those under 65 years old as more young people delay marriage and child-rearing and more mid-life marriages end. As the general population aged, the number of singles 65 years and older also increased at an elevated rate (7.6%) and now constitute 14% of the total households. This is similar to the region as a whole (11%). Taken together, changes to household types suggest the town and region are experiencing a decrease in demand for larger houses with many bedrooms, and an increased preference for units geared towards smaller families, childless-couples, and individuals.

South Hadley Households by Type, 2000 to 2010

	2000		2010		% Change 2000 - 2010
	#	% HHs	#	% HHs	
Husband-wife, no children	2,084	31.6%	2,112	31.1%	1.3%
Husband-wife w/ children	1,315	20.0%	1,094	16.1%	-16.8%
Male head, no spouse w/ children	88	1.3%	115	1.7%	30.7%
Female head, no spouse w/ children	343	5.2%	366	5.4%	6.7%
Other family arrangements	378	5.7%	469	6.9%	24.1%
TOTAL FAMILIES	4,208	63.9%	4,156	61.2%	-1.2%
Non-family, 2+ people, no children	245	3.7%	298	4.4%	21.6%
Non-family households w children	129	2.0%	150	2.2%	16.3%
Living alone under 65	1,102	16.7%	1,218	17.9%	10.5%
Living alone over 65	902	13.7%	971	14.3%	7.6%
TOTAL NON-FAMILIES	2,378	36.1%	2,637	38.8%	10.9%
TOTAL HOUSEHOLDS	6,586	100.0%	6,793	100.0%	3.1%
Households with person under 18	1,875	28.5%	1,725	25.4%	-8.0%
Households with person 65+	2,102	31.9%	2,178	32.1%	3.6%
Average household size (all)	2.33		2.25		-3.4%
Average family size	2.93		2.85		-2.7%

Source: US Census Bureau.

Not shown in the chart above is the fairly large number of people in South Hadley (2200, or 12.6% of the population) living in “group quarters.” The Census includes correctional facilities, nursing homes, hospitals, college dormitories, military barracks, group homes, missions, and shelters.

Within the category of group quarters are “institutional” and “non-institutional” residents. This is largely accounted for by the 2,189 students enrolled at Mount Holyoke College and living in campus dormitories.¹

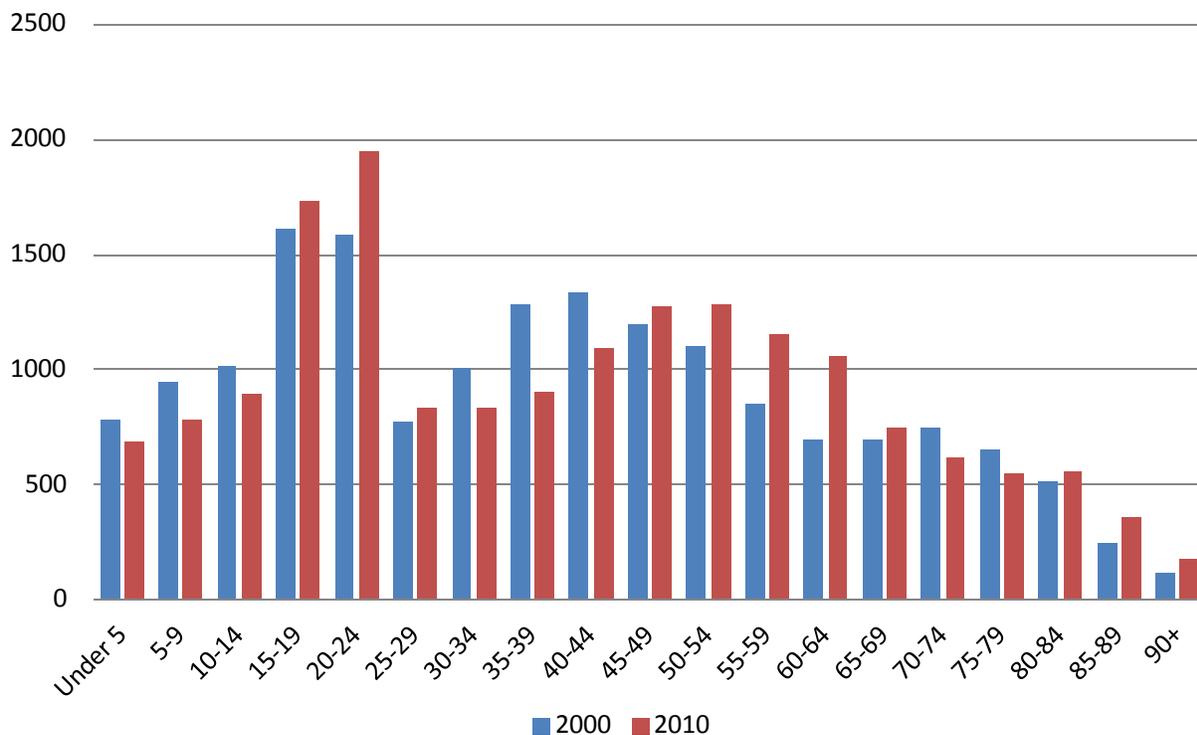
Trend 3: The population is aging and the large Baby Boom generation is entering retirement. Meanwhile, the Millennial generation is entering the housing market.

Between 2000 and 2010, the median age in South Hadley rose from 38.4 to 40.6 years old, and will continue to age, according to population projections. This trend is consistent with other Pioneer Valley

¹ Mount Holyoke College website “Fast Facts” <https://www.mtholyoke.edu/about/facts> Retrieved 11/23/15.

towns, as the large Baby Boom generation (people born 1946 to 1964) enters retirement age, and fewer working age and children replace them. The graph below shows South Hadley’s population by age cohort – ignoring the dramatic spikes of 15-24 year olds caused by Mount Holyoke College’s presence, a clear aging of the large group of Boomers is occurring. Also noteworthy: the large increase in the 85+ population, and a sizeable decrease in children as young families decline between generational bumps.

South Hadley Population by Age Cohort



Source: US Census Bureau.

Long-term population projections for South Hadley by the UMass Donahue Institute groups the ages differently, but similar trends are apparent. Their projections for the decades from 2010 to 2030 show:

- The portion of residents ages 29 and younger will fall significantly, by approximately -7.7% for the cohorts 10 to 19 and 20 to 29.
- There will be an even greater decline in the portion of “middle age” people ages 40 to 59, with drops of -11.4% in ages 40 to 49 and -18.7% in ages 50 to 59.
- The portion of residents age 60 and older will increase dramatically, from 25.6% for people age 60 to 69, 41.1% for people age 70 to 79, and 17.7% for people age 80 and older.

South Hadley Population Projections by Age

Age Group	Census 2010	Projection 2020		Projection 2030	
	#	#	% Change from 2010	#	% Change from 2010
Total	17,514	17,967	2.6%	18,273	4.3%
0-9	1,473	1,464	-0.6%	1,464	-0.6%
10-19	2,626	2,482	-5.5%	2,439	-7.1%
20-29	2,780	2,697	-3.0%	2,582	-7.1%
30-39	1,743	1,907	9.4%	1,845	5.9%
40-49	2,366	1,910	-19.3%	2,124	-10.2%
50-59	2,442	2,472	1.2%	2,058	-15.7%
60-69	1,815	2,414	33.0%	2,440	34.4%
70-79	1,169	1,545	32.2%	1,985	69.8%
80+	1,100	1,076	-2.2%	1,336	21.5%

*Source: Long Term Population Projections for Massachusetts Regions and Municipalities.
Henry Renski, Susan Strate. Umass Donahue Institute, March 2015*

Baby Boomers’ decisions about where to retire will significantly affect future population growth and housing trends. Market research from around the country shows the following trends concerning this generation:

- Many baby boomers wish to age in place, staying close to their social network and children.
- In surveys, many baby boomers say they continue to prefer suburban communities, but many are seeking to downsize and live in maintenance-free homes.
- A growing portion of baby boomers are seeking walkable locations near cultural and entertainment destinations such as theaters, museums, and restaurants. College towns and successful downtowns have seen growth from this group.
- Others seek low-tax rural havens, especially those areas with natural amenities such as Cape Cod, the Berkshires, and Vermont.
- Some retirees are continuing to move to other regions of the country, especially the Sun Belt.

Finding ways for aging people to stay in South Hadley while accommodating demand for smaller, maintenance-free housing will be important. In addition, the town might capitalize on interest in mixed-use living close to amenities such as Holyoke College and Village Commons.

Meanwhile, the large generation born in the 1980s and early 90s reached adulthood after the turn of the century and are now entering the housing market in greater numbers. Beyond relatively strong health and education sectors, growth in entry-level employment in the Pioneer Valley is not as robust as in other regions. Many young adults are leaving in search of greater opportunities, though most stay in the Northeast. The result is a decrease in the numbers of young adults and families.

Several factors concerning housing are unique to this generation:

- Across the country, less-dependable employment has translated into an increasing demand for rental rather than owner-housing. This may be even more important in the Pioneer Valley where, generally, housing values do not appreciate rapidly.
- A larger share of young adults are saddled with student loan debt, and individual debt is larger than previous generations. This delays the ability to buy a home or car, and increases demand for rentals, and smaller, more affordable homes.
- Perhaps tied to the above, Millennials have been shown more willing to use public transportation, walk, or bike, and are drawn to locations where this is possible.
- In addition, young adults tend seek locations where other young adults are, especially in places with vibrant arts scenes and social amenities such as bars, restaurants, and cafes. This trend is illustrated in the ongoing revitalization of Easthampton center.
- The Millennial generation is far more ethnically and racially diverse than previous generations. When seeking housing, they seem to emphasize the racial mix of a neighborhood or school less.
- Millennials are having fewer children, later in life. Early housing choices rely less on the perceived quality of public schools. Whether this preference increases as the generation ages remains to be seen.

South Hadley has several traits that make it competitive in attracting Millennials, including convenient commutes to locations of relatively stable employment in health and education, proximity to arts and culture centers in Northampton, Amherst, and now Easthampton, and relatively affordable housing prices and lower property tax rates compared to these places. Millennial attraction can be furthered by fostering affordable starter-housing as part of mixed-use developments in desirable, walkable nodes.

Trend 4: South Hadley is slowly diversifying in terms of race and ethnicity.

The population of South Hadley continues to be primarily white, encompassing about 91% of all residents. This is a higher proportion than in many of the surrounding towns. Most other racial groups have increased in number from 2000 to 2014, with the number of blacks trebling to become 3.8% of the population. Latinos of any race make up 4.6% of the town, nearly double the percentage in 2000. The majority of Latinos have Puerto Rican and other Caribbean origins. The 2010-2014 ACS estimated that 5.6% of South Hadley residents are foreign born and another 2.5% were born in Puerto Rico.

For some migrants from Puerto Rico and immigrants from other places, language can present a significant challenge to finding decent, safe, and affordable housing. In addition to the challenge of linguistic isolation, people may also be subject to linguistic profiling, which is the practice of using auditory clues such as accent or dialect—for example, over the telephone—to identify (supposed) race, ethnic origin or other characteristics, which are then used as the basis for discrimination. According to the ACS 2010-2014, an estimated 8.8% of South Hadley residents ages five and older spoke a language other than English at home – 1.5% are said to speak English less than “very well.” Non-English languages

spoken at home are (in order of population size) include Other Indo-European languages, Spanish or Spanish Creole, and Asian and Pacific Island languages. South Hadley is likely to continue diversifying – the South Hadley Public School District reports approximately 18% of students were racial or ethnic minorities for the 2014-15 school year.

Race in South Hadley, 2000-2014

RACE	2000		2010		2014		% Change
	#	% pop	#	% pop	#	% pop	
White	16,172	94.0%	15,770	90.0%	16,168	91.1%	0%
Black / African American	207	1.2%	393	2.2%	674	3.8%	226%
Amerindian / AK Native	20	0.1%	23	0.1%	16	0.1%	-20%
Asian	435	2.5%	706	4.0%	472	2.7%	9%
Hawaiian / Pacific Islander	10	0.1%	9	0.1%	23	0.1%	130%
Some Other Race	132	0.8%	223	1.3%	116	0.7%	-12%
Two or More Races	220	1.3%	390	2.2%	276	1.6%	25%
TOTAL POPULATION	17,196	100.0%	17,514	100.0%	17,745	100.0%	3%

Source: US Census Bureau, Decennial Census 2000 and 2010, ACS 2014 five-year estimates

Hispanics in South Hadley, 2000-2014

ETHNICITY	2000		2010		2014		% Change
	#	% pop	#	% pop	#	% pop	
Hispanic/Latino	405	2.4%	753	4.3%	823	4.6%	103%
Mexican	54	0.3%	87	0.5%	61	0.3%	13%
Puerto Rican	207	1.2%	405	2.3%	501	2.8%	142%
Cuban	6	0.0%	26	0.1%	4	0.0%	-33%
Other Hispanic/Latino	138	0.8%	235	1.3%	257	1.4%	86%
Not Hispanic/Latino	16,791	97.6%	16,761	95.7%	16,922	95.4%	1%
TOTAL POPULATION	17,196	100.0%	17,514	100.0%	17,745	100.0%	3%

Source: US Census Bureau, Decennial Census 2000 and 2010, ACS 2014 five-year estimates

South Hadley Public Schools Enrollment by Race/Ethnicity 2014-2015

Race	% of District	% of State
African American	1.7	8.7
Asian	1.5	6.3
Hispanic	9.4	17.9
Native American	0.3	0.2
White, non-Hispanic	82.0	63.7
Native Hawaiian, Pacific Islander	0.1	0.1
Multi-Race, Non-Hispanic	5.1	3.1

Source: Massachusetts Department of Education

Trend 5: An increasing number of residents are living with long-term disabilities and special needs that require specialized housing.

Disability is a protected class under federal law. Conditions can make it difficult for a person to do activities such as walking, climbing stairs, dressing, bathing, learning or remembering, which can then impede the ability to go outside the home alone or to work. Many residents with one or more disabilities face housing challenges due to a lack of housing that is affordable and physically accessible.

According to the American Community Survey’s 2009-2013, an estimated 822 (7.0%) of South Hadley’s population of residents age 18 to 64 (sometimes known as “working age” residents) have one or more disabilities, which include difficulty with hearing, vision, cognitive function, ambulating, self-care, or living independently. Cognitive and ambulatory difficulties were the most prevalent types of disability reported. Of South Hadley residents age 65 and older, an estimated 923 (31.4%) have one or more disabilities. Because the Town’s senior population is forecast to increase in coming years, the demand for barrier-free and accessible housing that accommodates people with disabilities is expected to increase sharply.

The proportion of population with disabilities in South Hadley is comparable to that of the region. The 2013 Pioneer Valley Regional Housing Plan notes the critical need for more accessible housing to meet existing and growing demand. The RHP also notes:

- The range of disabilities present in our region requires different types of accessible housing to serve the needs of persons with disabilities.
- The need for more concerted efforts to integrate accessible housing and housing with supportive services into our planning for market-rate and affordable housing development.
- Many of the existing units with accessibility features are often rented to people who do not need them or at least those particular features. More concerted efforts are needed to address this mismatch.

South Hadley Residents with Disabilities

Population with a disability	11.0%
Population 18 to 64 years	7.0%
With a hearing difficulty	0.6%
With a vision difficulty	0.7%
With a cognitive difficulty	2.8%
With an ambulatory difficulty	3.5%
With a self-care difficulty	1.4%
With an independent living difficulty	3.2%
Population 65 years and over	31.4%
With a hearing difficulty	12.8%
With a vision difficulty	4.1%
With a cognitive difficulty	6.5%
With an ambulatory difficulty	18.7%
With a self-care difficulty	6.1%
With an independent living difficulty	12.0%

Source: U.S. Census Bureau, 2009-2013 ACS.

Beyond those with long-term disabilities, there are populations with special needs that require specialized housing and/or support services including:

- Elderly and frail elderly
- Veterans
- Survivors of domestic violence
- Youth aging out of foster care
- People who are homeless
- At-risk youth
- People with substance abuse issues
- Ex-offenders
- People living with HIV or AIDS

In many cases, the needs of these subpopulations overlap, as do the institutions that serve them, although their priorities may differ. Due to lower incomes, special needs populations are more likely than the general population to encounter difficulties securing and retaining adequate housing, and often require enhanced support services. These populations often move through temporary placements, to transitional programs, and eventually seek permanent and stable housing options.

Municipal level data is not available on these special residents due to the fact that the population size of South Hadley is not sufficient to overcome high margins of error and/or risk identifying individuals because of their characteristics. However, the Regional Housing Plan summarizes each of these special needs populations and identifies key issues.

Homelessness populations include those who live long-term in shelters or in the woods or on the streets (actually a small subset of the homeless population), and those who experience a single episode of homelessness and then recover and regain housing stability. The causes of homelessness are complex, including both societal factors—such as housing costs that have outpaced income growth and the loss of manufacturing jobs—and individual factors—such as long-term unemployment, domestic violence, chronic illness, and substance abuse. Housing discrimination can also play a role in perpetuating homelessness. The economic recession begun in 2008 further exacerbated homelessness in the region.

There are no family shelters in the region – families seeking housing are directed to the Department of Transitional Assistance intake center in Holyoke and then are placed temporarily in housing, often in motels. Springfield, Holyoke, Northampton, Westfield, and Greenfield have larger populations of homeless people because many social service providers are located in these communities.

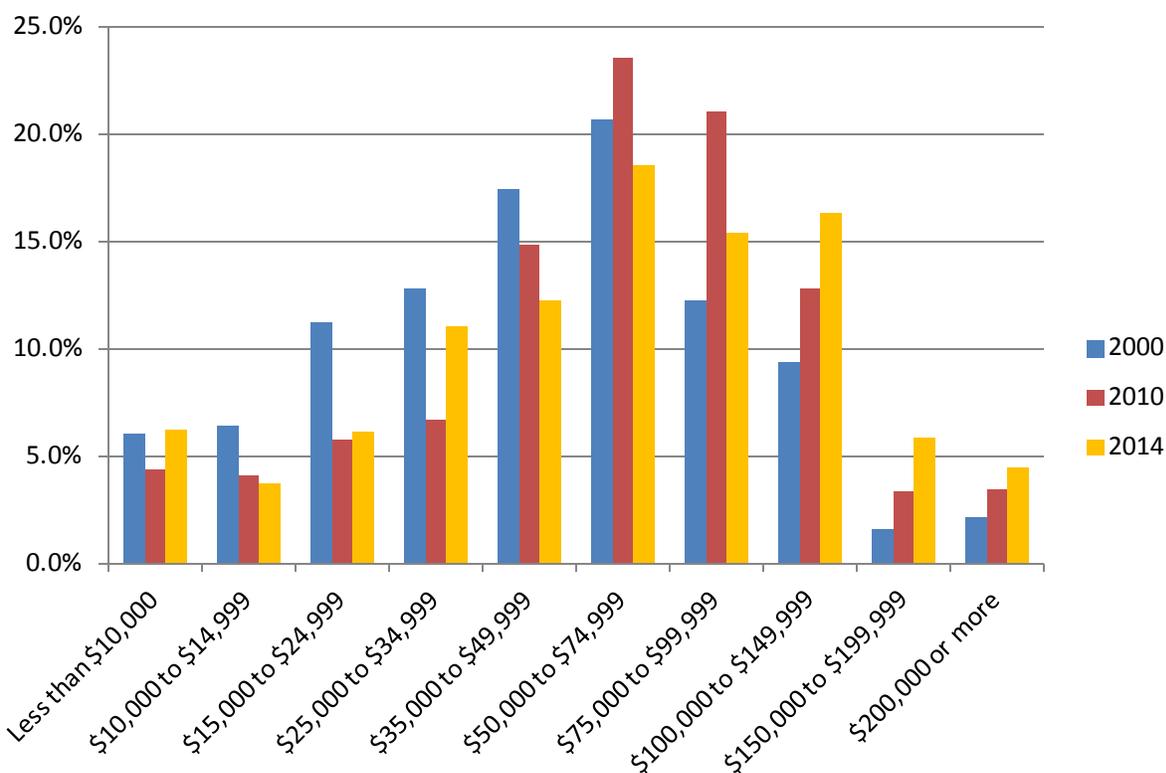
2.2 Income Characteristics and Trends

The ability to exercise housing choice depends on the amount of money a household can afford to spend on housing. Housing that is affordable for low-income and moderate-to-middle-income or “working” households are major regional and state priorities. Housing that is affordable to lower income households is critical to creating household stability and economic self-sufficiency. Housing that is affordable to working class and middle class households is critical to building and retaining talent and for improving the region’s and the state’s overall economic competitiveness.

Median household income levels have risen significantly in South Hadley during the past 15 years, from \$46,678 in 2000 to close to \$62,803 in 2014. The current median household income is slightly higher than the Hampshire County median of \$61,000, and higher than \$50,000 of Hampden County.

Though some of the increase is attributable to inflation, and while many know the community to be comprised of many working class residents, data shows that households making over \$100,000+ a year have increased substantially over last 15 years. This points to two trends: a higher number of households with two incomes rather than one, and wealthier people finding South Hadley attractive to live in. A breakdown of change by income category, shows the large increase in relatively wealthy households has been offset by a decrease in middle-income households.

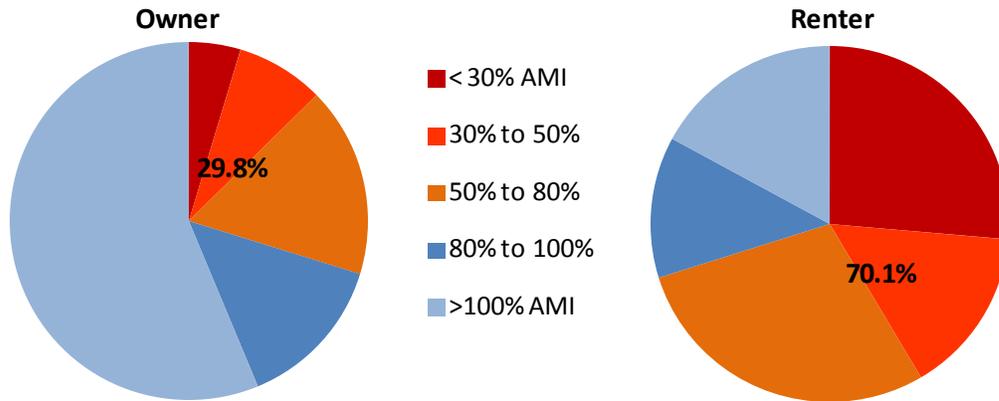
South Hadley Income Distribution, 2000-2014



Source: US Census 2000; ACS 2010-2014 five-year estimates. Note: The U.S. Census Bureau does not update data to adjust for inflation, which would allow a more accurate comparison between years.

The affect of these changes is that housing prices, especially for new construction or remodels, are driven higher than many existing households in the town can afford. 40% of the households in South Hadley earn at or below 80% of the Area Median Income level (\$68,200) of the Springfield MSA used as a benchmark to determine eligibility for subsidized housing. Renters, in particular, fall below this benchmark – 70.1% of renting households qualify. Geographically, many of these households reside in the South Hadley Falls area.

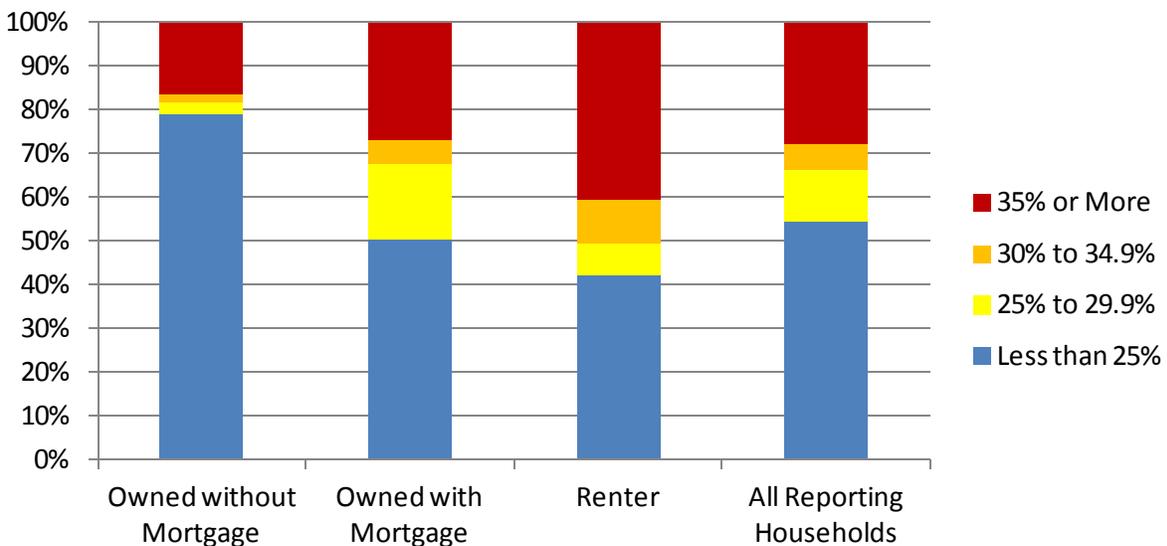
South Hadley Households Earning 80% or less of Area Median Income
(Warm colors meet affordable housing benchmarks)



Source: US Dept. of Housing and Urban Development, US Census Bureau.

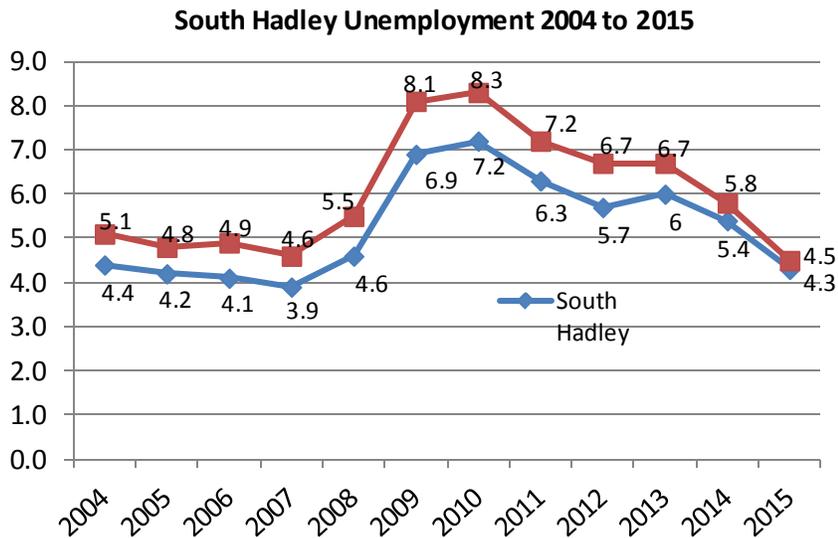
Examining housing costs as a percentage of a household’s income gives us an idea of the portion of households in South Hadley that are likely to be cost burdened by housing (described as spending more than 30% of income towards housing costs). While some of this data comes with larger margins of error than preferred, it is useful as a ballpark measurement. Somewhere around 18% of households that own their home outright could be considered cost burdened. This number rises to about 32% of owners with mortgages, and about 50% of renting households. In addition, there are households paying between 25% and 30% of income on housing, who could fall into the “cost burdened” category should income drop or housing costs rise.

South Hadley Housing Costs as a Percentage of Household Income, 2014



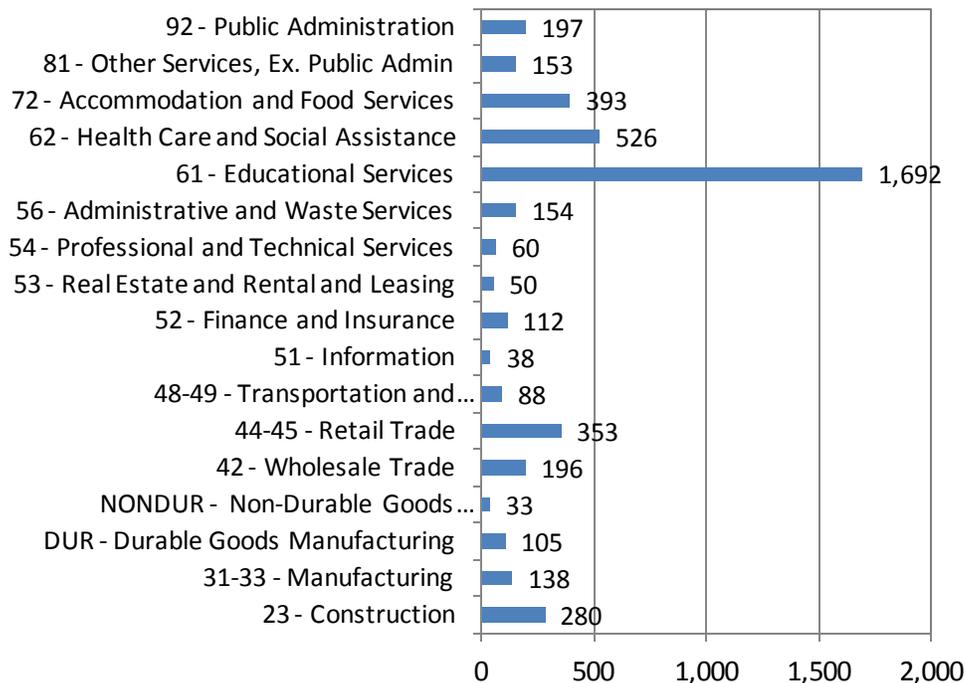
Source: US Census Bureau, ACS 2010-14. Data uncertainties create significant margins of error, but the measurements are useful as estimations.

Economically, South Hadley’s unemployment rate has recovered from the post-recession high of 2010, yet the town is highly dependent on other towns for employment – 72% of workers commute beyond the town, with large portions working in regional education and healthcare. At the lowest income levels, approximately 4.2% of the 4,198 families in South Hadley lived below the poverty level in 2014. Single-mother families are disproportionately affected: 12.7% were below the poverty level.



Source: Massachusetts Department of Labor and Workforce Development.

South Hadley Employment by Two-Digit NAICS Code, Monthly Average for 2014



Source: MA Department of Labor and Workforce ES-202 data.

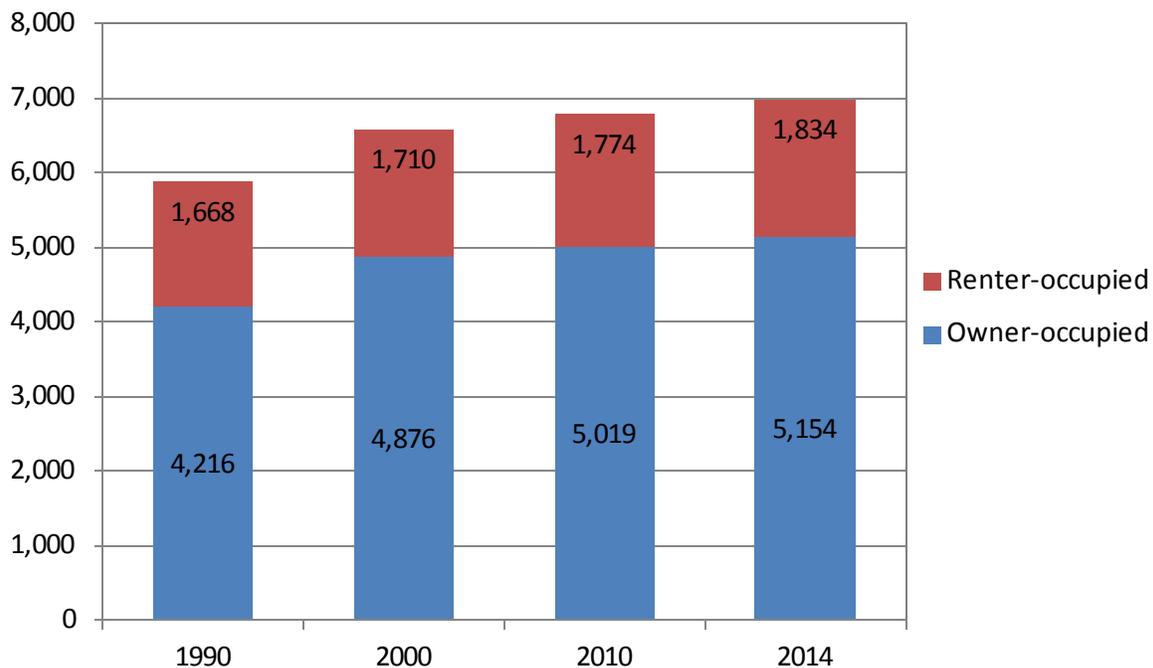
2.3 Housing Characteristics and Trends

Previous sections looked at the population and income trends affecting South Hadley and what they may say about housing demand and affordability pressures. This section examines the characteristics of the housing stock in the town, allowing us to see if there may be mismatches between demand and existing supply.

According to the US Census' American Community Survey 2010-14, there are 7,435 housing units in South Hadley. Of these, 447 (6%) were vacant. Over the past few decades, the number of units has increased at a slightly faster pace than the region as a whole, but as in most communities, that increase slowed considerably following the 2008 recession.

In the last 14 years, the share of housing being rented has remained constant at 26%. This is consistent with comparably sized communities in the region. (Larger cities such as Springfield and Holyoke have owner/renter ratios closer to 50/50, while outlying communities such as Monson have 82% owner-occupied / 18% renter-occupied splits). The rental vacancy rate was pegged at 2.1% in 2014, which is fairly low and suggests a high demand/low supply situation. This is a significant concern, as rental homes are often the first, and many cases, only option for young families, single-parent families, and individuals – all of which are growing segments of the South Hadley population. Most of the new rental housing stock appears to be from existing owner-occupied homes flipping to rentals, as opposed to new construction of rental units.

Occupied Housing Units in South Hadley, 1990 to 2014



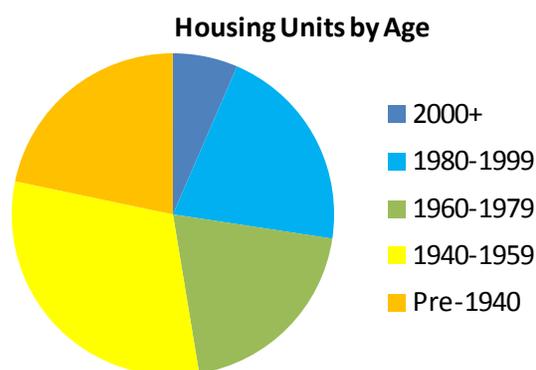
Source: U.S. Census Bureau.

The trend of flat to low rental housing production is also true at the regional level for the past 20 years, especially in communities outside the region’s larger cities (Springfield, Holyoke, Northampton and Amherst). Most communities in the region saw limited growth in rental housing or a loss of rental units from 1990 to 2014. Much of the rental housing within buildings of four units or more that has been produced over the last two decades has been income-restricted housing, which means that market-rate rental housing development has been almost non-existent.

Age of Housing Stock

Well-maintained older homes are an important part of a community's local history and help preserve historic character; however, older homes can have many challenges:

- Increased need for maintenance and repairs;
- Some have poor past maintenance and repair history, especially in the region's urban centers, resulting in a deteriorated state that requires costly rehabilitation;
- Design of many older homes are not well-suited for people with mobility impairments and can be expensive to retrofit;
- Outdated and inefficient heating, cooling, and insulation systems that result in higher associated utility costs;
- Outdated materials and products that present personal health risks such as: lead paint, asbestos, and lead pipes.

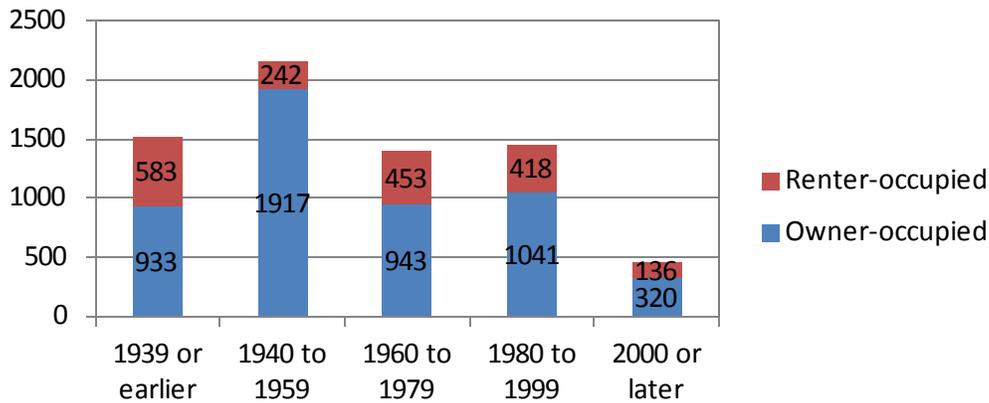


Source: U.S. Census, ACS 2010-14.

Like most established Northeast places, South Hadley has a high percentage of older homes, yet the average age here is younger than in communities like Holyoke and Northampton, reflecting more recent suburban development. Over half of the units are at least 55 years old, and 41% of these were built pre-WWII.

At the regional scale there is a correlation between the age of a home and its tenancy status as owner- or renter-occupied: 66.2% of owner-occupied homes in the Valley are at least 50 years old; for renter-occupied homes, the rate is 76.2%. South Hadley reflects this correlation to a limited extent – the older the home, the more likely it is rented. A noted exception are homes built in the 40s and 50s, which remain 89% owner-occupied (zoning restrictions against multi-family uses were strongest in these decades). Compared to previous decades, relatively little new housing, owner or rental, has been constructed since 2000. The recession of course plays a large part in this. Given that a good amount of the rental units constructed post-2000 are income- or age-restricted units, this means there has been a significant lack of new market-rate, unrestricted rental units constructed.

Housing Units by Age and Tenancy



Source: U.S. Census, ACS 2010-14.

Since the cost to rehabilitate and achieve code compliance in older houses can be extremely high, some landlords and homeowners cannot afford to make these improvements or some have not invested in their properties because low home values do not justify the cost of capital or maintenance improvements. Deferred maintenance can result in low-quality or unsafe housing.

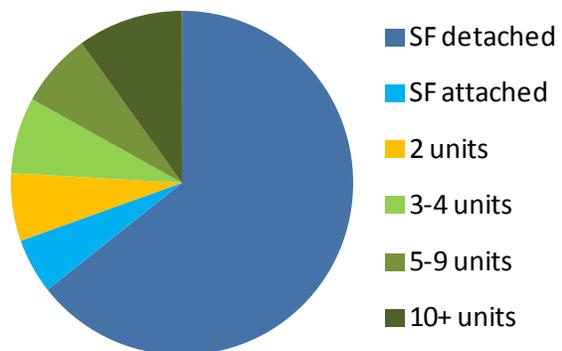
The age of the housing can also create impediments to fair housing. Some landlords have tried to avoid renting to families with young children because of the presence – or the perceived presence – of lead paint in their units and the associated expense of lead abatement and disposal, even though doing so is prohibited by law. This has the effect of limiting the supply and availability of housing, especially for families with young children.

Housing Typology

Housing affordability is closely related to a structure’s typology. In general, multi-family and smaller single-family homes (i.e. 1,500 square feet or less) on smaller lots (i.e. 1/4 acre or less) tend to be more affordable to a wider range of individuals and families than larger single family homes on large lots (typically 1 acre or more).

The majority (63%) of housing units in South Hadley are single-family detached buildings – this is similar to the average across the region, and typical for older mill towns. By comparison, rural towns and newer suburbs such as nearby Hadley and Granby have far higher percentages.

Housing Units by Type

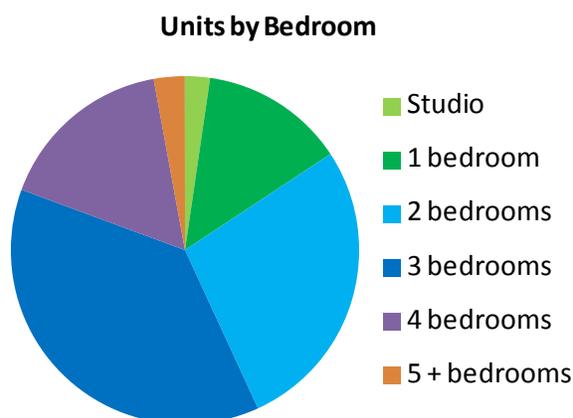


Source: U.S. Census, ACS 2010-14.

19% of South Hadley’s building stock is of attached 1-family, and 2 to 4 unit buildings. Many of these reside in South Hadley Falls, where older buildings were often built as duplexes and triplexes (a vernacular style in New England mill towns) and older single-unit houses have been divided to produce additional units. Larger buildings with 5 or more units make up 17% of the stock. The vast majority (84-95% depending on typology) of buildings with 3 or more units are rented, not owned (e.g. condos). By comparison, only 13% of single family detached dwellings are rented.

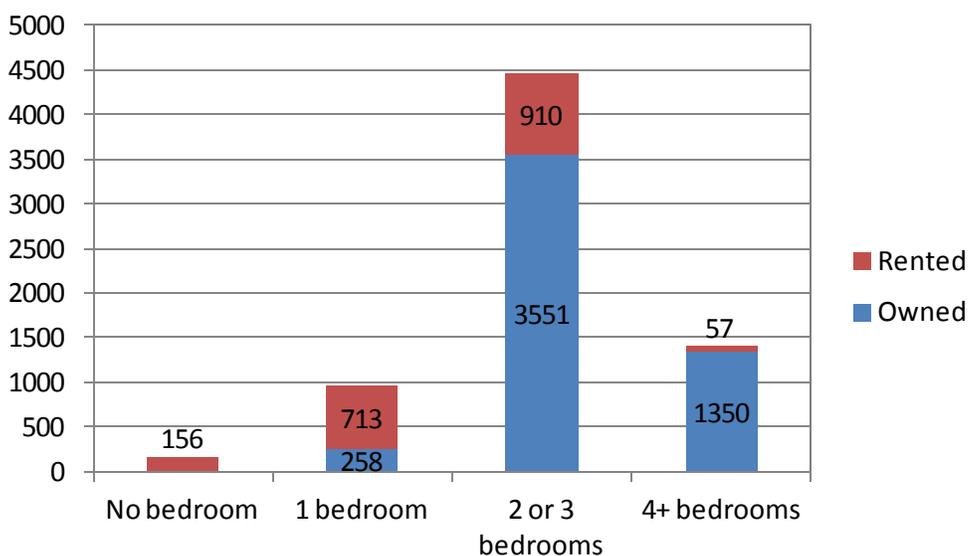
Housing Unit Size (Number of Bedrooms)

Considering the changing demographics in town (increasing elderly, childless couples, and singles), it is helpful to review the housing stock regarding the number of bedrooms in each home. The large majority (69%) of homes in South Hadley are 2-3 bedrooms, which are useful in accommodating a variety of household sizes. Smaller units – studios and 1-bedrooms – constitute 17% of housing. There will likely be market demand for more of these given that 32% of current households are single living alone and this percentage will likely increase. The majority of small units are rented, which is consistent with the changing circumstances single households often face.



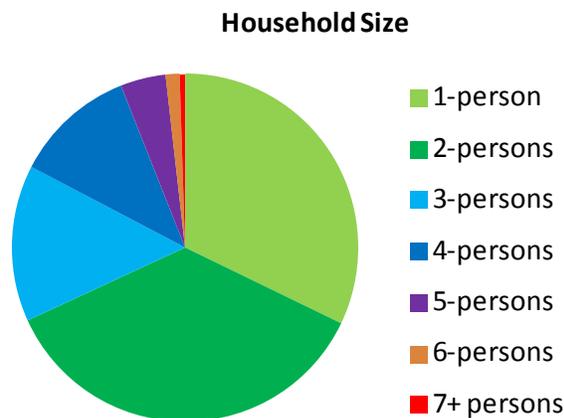
Source: U.S. Census, ACS 2010-14.

South Hadley Houses by Number of Bedrooms and Tenancy



Source: U.S. Census Bureau, ACS 2010-2014.

Larger rental units of 4+ bedrooms might be slightly under-represented – there is a good percentage (21%) of these larger units as part of the total stock, but only 4% are rented. Typically, larger family sizes correlates with diminishing housing affordability. Massachusetts’ principal housing agencies—the Department of Housing and Community Development, the Massachusetts Housing Partnership, MassHousing, MassDevelopment, and the Community Economic Development Assistance Corporation—have established an interagency agreement that requires at least 10% of new affordable homes that are funded, assisted, or approved by one of these agencies to have three or more bedrooms.² However, there seems grounds to waive this requirement, considering the relatively low portion of large-sized households (it seems this requirement could be waived considering that households with 4 or more persons are only 17.3% of total households).



Source: U.S. Census, ACS 2010-14.

2.4 Existing Affordable and Restricted Housing

This section catalogs South Hadley’s existing affordable and restricted housing stock.

Subsidized (Income Restricted) Housing

There are two forms of income-restricted housing: public and private. Public income-restricted housing is managed by a public housing authority, established by state law to provide affordable housing for low-income people. Private income-restricted housing is owned and operated by both for-profit and non-profits owners who receive subsidies in exchange for renting to low- and moderate-income people. Both will be discussed in separate sections.

As of 2016, there were 396 units (5.6% of year round housing) listed on DHCD’s Subsidized Housing Inventory. Three things about this inventory are worth noting. First, all of the units are rentals (all of the units are this not necessarily income-restricted, since under Chapter 40B both subsidized and

² The Bedroom Mix Policy does not apply to affordable developments for age-restricted housing, assisted living, supportive housing for individuals, single room occupancy, or other developments in which the policy is not appropriate for the intended residents. The Bedroom Mix Policy also does not apply to new affordable developments where such units: (i) are in a location where there is insufficient market demand for such units, as determined in the reasonable discretion of the applicable State Housing Agency; or (ii) will render a development infeasible, as determined in the reasonable discretion of the applicable State Housing Agency. A state housing agency also has the discretion to waive this policy (a) for small projects that have less than ten (10) units and (b) in limited instances when, in the applicable agency’s judgment, specific factors applicable to a project and considered in view of the regional need for family housing, make a waiver reasonable.

non-subsidized units in a rental development count). Second, all the units except Hubert Place are deed-restricted in perpetuity, meaning the town need not concern itself with expiring units. Third, several of the projects were built pursuant to a comprehensive permit issued by the Zoning Board of Appeals under Chapter 40B.

South Hadley SHI-Listed Housing Units, 2016

DHCD Id #	Name	Address	Type	SHI Units	Expires	Comp. Permit?	Subsidizing Agency
2853	Lathrop Village	69 Lathrop St.	Rental	48	Perp.	No	DHCD
2854	Lathrop Village	69 Lathrop St.	Rental	48	Perp.	No	DHCD
2855	Newton Manor	643 Newton St.	Rental	40	Perp.	No	DHCD
2856	n/a	27 Abbey Lane	Rental	8	Perp.	Yes	DHCD
2857	Abbey St.	Abbey St.	Rental	12	Perp.	Yes	DHCD
2858	Hampshire Cty RHA	North St.	Rental	2	Perp.	No	DHCD
2859	Riverboat Village	River Lodge Rd.	Rental	170	Perp.	Yes	DHCD
4460	DDS Group Homes	Confidential	Rental	24	N/A	No	DDS
9144	Hubert Place	93 Canal St.	Rental	44	2048	No	HUD/DHCD
Total SHI Units in South Hadley				396	5.58% of housing stock		

Source: DHCD

Of the comparable Pioneer Valley communities used for analysis, only Amherst and Hadley have exceeded the goal of providing a minimum of 10 percent of their housing stock as affordable. Interestingly, these are the most and least populated communities analyzed. South Hadley ranks in the middle of those communities that have not achieved the 10 percent goal.

The South Hadley Housing Authority, in operation for 58 years, manages five properties, including Lathrop Village (96 units), Newton Manor (40 units), Abbey Street (12 family units), Hubert Place (44 elderly units), and a duplex with eight bedrooms for physically and mentally challenged individuals. The 2010 Master Plan describes the waiting lists for units – the situation remains similar:

- 85 applications are on file for family housing with an average wait of 8 – 10 years; 43 are for two-bedroom units and 42 for three-bedroom units (12 from South Hadley residents).
- 35 applications are pending for elderly housing with an average wait of one year (12 from South Hadley residents).

Subsidized Housing in Comparable Communities

Community	2000 Census Year Round Housing Units	Total SHI Units	Percent SHI Units
South Hadley	7,091	396	5.6%
Amherst	9,621	1,034	10.7%
Belchertown	5,771	372	6.4%
Easthampton	7,567	449	5.9%
East Longmeadow	6,072	436	7.2%
Granby	2,451	66	2.7%
Hadley	2,200	285	13.0%
Ludlow	8,337	187	2.2%
West Springfield	12,629	440	3.5%
Wilbraham	5,442	253	4.6%

Source: DHCD, Chapter 40B Subsidized Housing Inventory (SHI) as of June 1, 2010.

Rental Assistance for Lower Income Households

Rental assistance to afford housing can be obtained through vouchers, where the subsidy is used by a tenant to find rental housing in the private market and is paid to a private landlord. This subsidy stays with the tenant. There are two rental voucher programs available in Massachusetts – the housing choice voucher program also known as the federal Section 8 program and the Massachusetts Rental Voucher Program (MRVP). The Section 8 voucher program was enacted in 1974 to promote economic and racial integration and to shift public assistance to the private market. The MRVP has a similar purpose.

In 2012, a total of 9,760 vouchers were allotted in the region through either the Section 8 or MRVP program. These vouchers were allotted to and administered by the housing authorities of Amherst, Chicopee, East Longmeadow, Holyoke, Monson, Northampton, Springfield, Ware (administered by Westfield), West Springfield, and Westfield as well as by DHCD via HAP Housing. The South Hadley Housing Authority does not currently administer vouchers, and South Hadley residents do not have local preference status with any of the housing authorities that administer vouchers.

There is a much greater demand for vouchers than supply in the region. On April 5, 2012, there were 117,471 applicants currently waiting on the Massachusetts Section 8 Centralized Waiting List. The Massachusetts Chapter National Association of Housing and Redevelopment Officials (MassNAHRO), the administrators of the Centralized Waiting List, noted that an estimated wait time for a voucher cannot be gauged since all 86 housing authorities in the state have different selection preferences. However, they stated that some applicants have been waiting since the Centralized List opened in 2003. All voucher administering agencies in the region except the Northampton Housing Authority and HAP Housing utilize the state’s Centralized Waiting List to distribute vouchers.

Senior Housing

South Hadley has the following age-restricted senior housing options, with varying levels of care:

South Hadley Age-Restricted Housing

Development Name	Income Restricted?	Units
	Yes, Public housing	40
	Yes, Public housing	50
	Yes, Public housing	30
	Yes, Public housing	31
	Yes, partially	unknown

Source: DHCD, South Hadley Housing Authority

The South Hadley Housing Authority currently maintains 44 units of affordable housing for persons age 60 years and older and additional affordable housing units. At present, there are no ownership opportunities for senior households that qualify as affordable under Chapter 40B legislation.

Accessible Housing

According to the American Community Survey's 2009-2013, an estimated 822 (7.0%) of South Hadley's population of residents age 18 to 64 have one or more disabilities, which include difficulty with hearing, vision, cognitive function, ambulating, self-care, or living independently. Among residents age 65 and older, the proportion of people with disabilities is significantly greater, with 923 persons (31.4% of population age 65+) having one or more of these disabilities. No matter their age, people with disabilities often face challenges in finding a home that is both affordable and safely accommodates their disability or disabilities—whether these are physical disabilities that require features such as ramps or elevators to be fully accessible, or features that help people with hearing or visual impairments live more safely and comfortably.

To address this long-standing problem, the Citizens' Housing and Planning Association (CHAPA), in conjunction with a variety of partners, created the web-based Massachusetts Accessible Housing Registry (MassAccess online at <http://www.massaccesshousingregistry.org>) in 2000 to help people with disabilities find affordable and accessible housing in Massachusetts. The Registry has been the best attempt at centralizing the total number of available accessible/adaptable units, units on a ground floor, or units accessible by elevator. The management of Mass Access believes that the registry captures over 80% of all accessible housing rental housing that is available.³

³ Accessible homeownership housing is more difficult to gauge because there may be a number of homeowners who may have made accessibility improvements to their homes with no intention of selling in the near future.

The registry suggests that there is a great shortage of accessible housing units compared to the number of residents with one or more disability. As of November 30, 2015, the registry showed that there were only four accessible/adaptable units available in Hampshire and Franklin Counties (two in Easthampton and two in Springfield) of which all four were “income-based,” where the rent or price is based on the income of the occupant. The Regional Housing Plan identifies that this shortage also exists at the regional level and for every community in the region.

Special Needs Housing

Special needs housing typically refers to housing units specifically designed for populations with special needs such as: people with psychiatric and cognitive disabilities; veterans; survivors of domestic violence; youth aging out of foster care and at-risk youth; people with substance abuse issues; ex-offenders; people living with HIV or AIDS; and people who are homeless.

- The Massachusetts Department of Developmental Services (DDS) (formerly Department of Mental Retardation) operates group homes in the city (discussed in the next section).
- The South Hadley Housing Authority provides eight public housing units for physical and mental special needs.

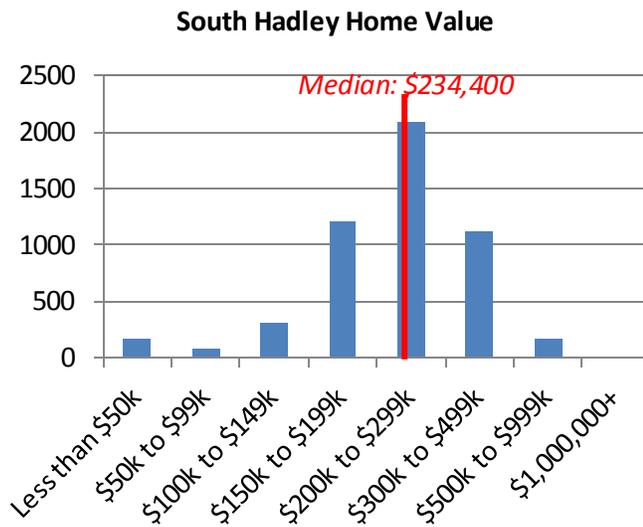
The Regional Housing Plan discusses the special needs housing for these and the other special populations that is available in our region, and notes the demand for all forms of special needs housing in our region far outstrips the supply of these units.

3. HOUSING DEVELOPMENT CONDITIONS

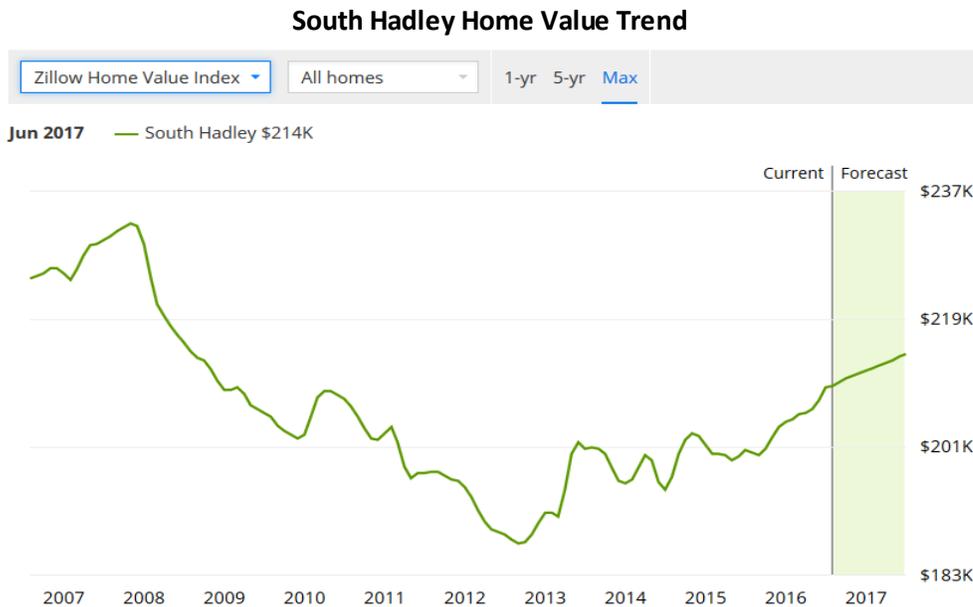
The purpose of this section is to understand local housing market conditions in and around South Hadley. Housing development is, of course, a complex process influenced by a variety of conditions, many of which are beyond local control – market preferences, financing conditions, materials costs, the regional and national economy, etc. This section therefore focuses on the constraints and limitations placed on housing development by local geography, infrastructure, and regulation.

3.1 Housing Market

As of 2014, the median value of housing in South Hadley is \$234,400 according to self-reported U.S. Census data. Real estate websites such as Zillow.com track sales more closely, and estimate the median at \$209,800, or about \$145 per square foot. As in many communities in the United States, this value has fluctuated during the recession, sinking from a high of \$232,000 in 2008 to a low of \$188,000 in 2012 before rising, leaving approximately 9.7% of property owners with negative equity.



Source: U.S. Census Bureau, ACS 2010-2014.



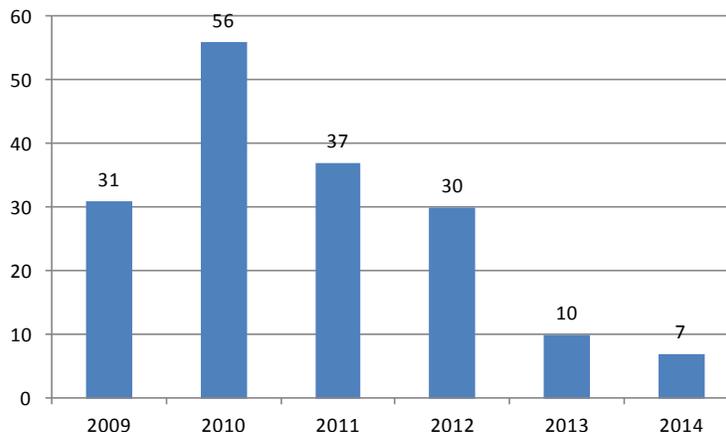
Source: Zillow.com, July 2016

While certainly not the worst hit community in the region, South Hadley did experience a fair amount of foreclosure activity following the recession. New foreclosures have tapered off recently, but did serve to dampen the prices of homes.

South Hadley is far from the most expensive (Amherst) or least expensive (Chicopee) of nearby comparable towns. It lies in the middle in terms of housing

values and rental rates. Measuring rental prices is a little more difficult since there are far fewer rentals in town. Typically, rents are between \$1.00 to \$1.30 per square foot in the Valley – Zillow indexes South Hadley at \$1.20 per square foot.

South Hadley Home Foreclosure Deeds Filed 2009-2014



Source: Warren Group

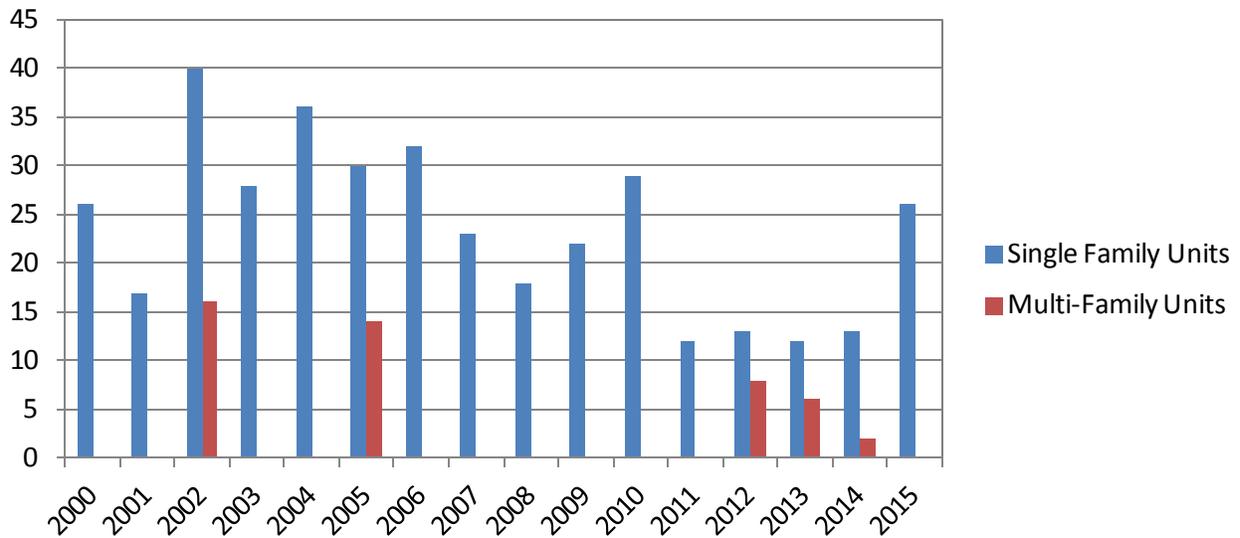
Zillow Home Value & Rent Index for, June 2016

	Home Value (ZHVI)	Peak Month	Change from Peak	Forecast ZHVI	Forecast 2017	Negative Equity	Rents (ZRI)	Rent Year-on-Year
Agawam	\$183,200	Sept '06	-15.3%	\$187,233	2.2%	9.9%	\$1,512	0.6%
Amherst	\$306,500	Nov-11	-4.5%	\$312,914	2.1%	6.5%	\$2,061	0.8%
Chicopee	\$166,800	Jun-07	-6.7%	\$170,907	2.5%	11.3%	\$1,379	-1.1%
Easthampton	\$231,000	Oct-07	-1.0%	\$236,312	2.3%	4.5%	\$1,775	9.2%
Granby	\$227,000	Sep-06	-3.0%	\$232,288	2.3%	6.2%	\$1,830	13.2%
Holyoke	\$174,600	Mar-06	-8.7%	\$179,059	2.6%	11.2%	\$1,385	0.4%
Northampton	\$263,700	Jun-16	0.0%	\$270,048	2.4%	5.2%	\$1,865	4.8%
South Hadley	\$209,800	Oct-07	-9.8%	\$214,552	2.3%	9.7%	\$1,703	9.3%
West Springfield	\$202,300	Aug-06	-4.2%	\$207,151	2.4%	8.2%	\$1,538	3.1%

Source: Zillow Market Overview Report, June 2016. (ZHVI = Zillow's proprietary Home Value Index)

The effect of South Hadley’s middle-of-the-road costs is that housing is generally kept affordable for more middle income households, but for-profit developers may find it hard to create affordable housing as part of market-rate projects. Of note, however, is the recent sharp increase in rent prices – indicating that rental demand is increasing faster than supply.

Building Permit Activity in South Hadley



Source: HUD, Building Permit Database

Data for building permits and recent sales of new-construction homes shows how developers are responding to current market demand and the prices new units command. Except for a few significant projects in the early 2000’s, multi-family construction was largely ignored. This has changed post-recession as developers learn to serve the growing demand for lower-maintenance houses and yards (and optimize building sites). Condos make up a significant portion of recent construction – 11 out of 32 sales of recent builds were condos. In addition, many of the new-build single-family houses are on small lots.

Unsurprisingly, new houses are command a price premium – the median sales price for single-family houses is \$392,000 and new condos is \$320,100. While these prices are 87% and 53% respectively above the median sales price for all housing, they may have limited potential to subsidize construction of affordable units. Almost no new construction rental units have been built recently in South Hadley, so measuring the premium for new rental units is difficult.

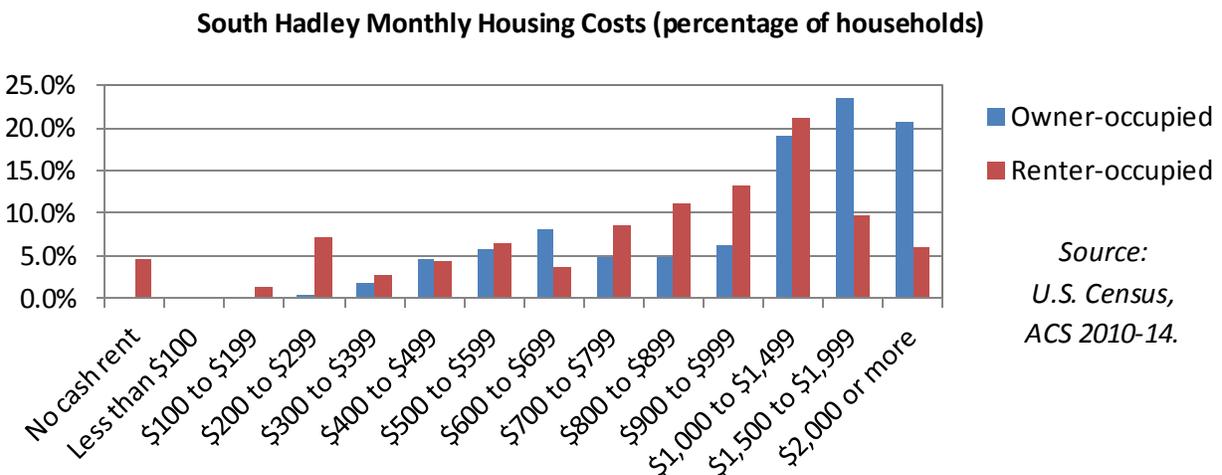
Recent Sales of New Construction Homes in South Hadley (Built 2010+)

	<i>Yr Built</i>	<i>Sale Date</i>	<i>Sale Price</i>	<i>Lot</i>	<i>Beds</i>	<i>SqFt</i>	<i>\$/SF</i>
SF Detached	2012	9/25/2013	\$425,000	0.33	5	2,736	\$155
	2013	10/10/2013	\$325,000	0.69	4	1,436	\$226
	2012	4/3/2014	\$435,000	1.27	4	2,240	\$194
	2014	5/5/2014	\$165,000	0.72	5	3,723	\$44
	2010	6/20/2014	\$465,000	0.32	3	2,510	\$185
	2012	6/20/2014	\$311,000	0.41	3	1,700	\$183
	2013	6/26/2014	\$465,000	0.33	3	2,250	\$207
	2012	7/22/2014	\$447,500	0.35	3	2,509	\$178
	2013	8/20/2014	\$410,000	0.33	3	2,239	\$183
	2013	10/9/2014	\$54,000	0.95	4	2,548	\$21
	2013	2/3/2015	\$351,300	0.69	3	1,884	\$186
	2014	4/16/2015	\$369,000	0.77	3	1,780	\$207
	2010	6/25/2015	\$395,000	0.70	3	2,643	\$149
	2014	7/10/2015	\$350,000	2.90	3	1,777	\$197
	2012	7/30/2015	\$410,000	0.32	3	2,197	\$187
	2011	7/31/2015	\$453,000	0.33	4	2,697	\$168
	2011	10/16/2015	\$360,000	1.87	3	2,406	\$150
	2013	10/22/2015	\$415,000	1.09	3	2,381	\$174
	2015	11/13/2015	\$382,507	0.69	3	2,018	\$190
	2016	4/22/2016	\$389,000	0.69	4	2,000	\$195
		Median		\$392,000	0.69	3	2,245
Condo	2011	8/22/2013	\$290,000	-	2	1,770	\$164
	2010	8/28/2013	\$324,900	-	2	1,922	\$169
	2011	8/30/2013	\$343,850	-	2	1,770	\$194
	2012	10/24/2013	\$305,050	-	2	1,439	\$212
	2012	11/15/2013	\$289,900	-	2	1,450	\$200
	2012	4/2/2014	\$299,900	-	2	1,448	\$207
	2013	5/9/2014	\$337,500	-	2	1,800	\$188
	2012	7/2/2014	\$333,775	-	2	1,439	\$232
	2013	10/7/2014	\$307,000	-	2	1,439	\$213
	2013	11/3/2014	\$320,100	-	2	1,439	\$222
	2014	3/1/2015	\$327,335	-	2	1,439	\$227
		Median		\$320,100	-	2	1,448
Duplex	2014	4/30/2015	\$250,000	0.43	6	1,488	\$168

Source: Zillow.com

3.2 Housing Affordability Analysis

Understanding housing costs versus housing prices in relation to Area Median Income thresholds allows us to assess the affordability of housing in South Hadley. A general rule of thumb is that housing is 'affordable' if the household pays no more than 30% of its annual income on housing. As Section 2.2 showed, approximately 33% of households in South Hadley pay this amount. The U.S. Census gives an indication of the range and distribution of housing costs in South Hadley, distinguished by tenure. South Hadley displays a typical pattern where rent costs are skewed lower than housing costs:



The cost measurements make a useful comparison with estimated costs of housing that meet the 30%-of-income threshold for households at the 80% of Area Median Income limits described earlier. Several assumptions are made concerning down payment amount, interest rate, and primary mortgage insurance that reflect typical buying conditions for low-income families.

Estimated Affordable Monthly Housing Cost Thresholds for Springfield MSA

	1-person	2-person	3-person	4-person	5-person
Low-Income Limits (80% AMI)	\$46,100	\$52,650	\$59,250	\$65,800	\$71,100
Utilities (estimated)	\$250	\$350	\$425	\$500	\$550
Rental Price (estimated)	\$903	\$966	\$1,056	\$1,145	\$1,228
Sales Price (estimated)	\$100,000	\$107,000	\$117,000	\$127,000	\$136,000

Source: HUD income limits, PVPC. Rental prices are assumed to be 30% of income limits minus utilities. Sales prices calculated with same monthly payment and the following financial assumptions: 30yr fixed mortgage; 5% down; 5% closing costs rolled into mortgage; 5% interest; 2% property tax; .6% insurance; .75% PMI; 1% maintenance costs, no HOA fees.

A check of Craigslist, Padmapper, and Zillow in August 2016 found 12 rental units offered with South Hadley. While this is just a snapshot, the asking prices should be regarded as typical, and lend support to the theory that while there are rental properties affordable to low-income households in South Hadley, there are not many. A significant and growing portion of rental units are beyond the means of Low-Income households.

Available South Hadley Rental Units, August 2016

Size	# Units	Range	Median
1 bedroom	2	\$925 - \$1045	\$985
2 bedrooms	7	\$935 - \$1250	\$1100
3 bedrooms	3	\$1500 - \$1600	\$1550
4+ bedrooms	1	\$2600	\$2600

Source: Craigslist, Padmapper, Zillow

Homeownership is also problematic. Only 8 units were on offer for \$140,000 or below in August 2016. Some of these were in the range of affordability given the household size, but the better maintained products were not. All the units at this lowest price range were in or near the South Hadley Falls

South Hadley Sales Housing (below \$140k), August 2016

Size	#	Range	Median
2 bedrooms	4	\$104k - \$130k	\$125k
3 bedrooms	4	\$92k - \$138k	\$121k

Source: Zillow

area of town. In conclusion, while South Hadley is not a community with a tremendous affordable housing problem at this time, at least compared to other communities in the region and state, new market-rate construction is certainly not within reach of targeted households, and the costs of existing housing and rental units are climbing further away from affordability.

To extend this conclusion, several points are worth noting:

- In reality, homeownership is often more difficult than assumed here due to tighter lending requirements, depending on the buyer's credit, income history, and debt load – measurements that often push low-income households out of the mortgage market. Even with good credit, required down payments can climb to 15-20%, unlike in the pre-recession years. Higher interest rates, including variable-rate mortgages, can also significantly increase costs.
- Likewise, renting comes with large hidden costs, such as first and last month's rent, security deposit, and possible application or broker fees, which can preclude some households from affording to rent.
- Very-Low and Extremely-Low Income thresholds (50% and 30% AMI respectively) are far from meeting housing costs as measured here. Even in towns with relatively low market rents and concentration of government-subsidized units, such as Springfield and Holyoke, many households face a gap between what they can afford to pay for housing and actual housing costs. As Holyoke's 2010-2014 Consolidated Plan acknowledged: "a significant number of rental households have incomes at or below 50% of median and just simply cannot afford even below market rents, although such apartments are available. No amount of additional construction or reconstruction can affect the income of potential tenants. Without some sort of rental assistance, certain families cannot afford even the lowest rents required to keep buildings viable. These are the families that require subsidies, and would require them no matter where they lived."

3.3 Development Constraints and Limitations

South Hadley faces some considerable constraints and limitations on new development, from basic geography, to municipal service areas, to land use regulations. This section outlines these and discusses how they relate to residential development.

Environmental Constraints and Limitations

The following environmental conditions place constraints on residential development in South Hadley. These are mapped on the following pages.

Steep slopes

Generally speaking, any slope under 15% grade is considered suitable for development – slopes greater than 15% are considered "excessive" or "steep" for residential or agricultural uses. Due to the high potential for erosion on steep slopes, it is best to preserve these areas as undeveloped. Most steep slopes in South Hadley are in the Holyoke Range in the north end of town, but there are ribbons of slopes in specific locations such as the Connecticut River escarpments to the north of the Falls area, hills east of Lower Pond on Holyoke College's campus, and areas along Buttery Brook in the south and Batchelor Brook in the north.

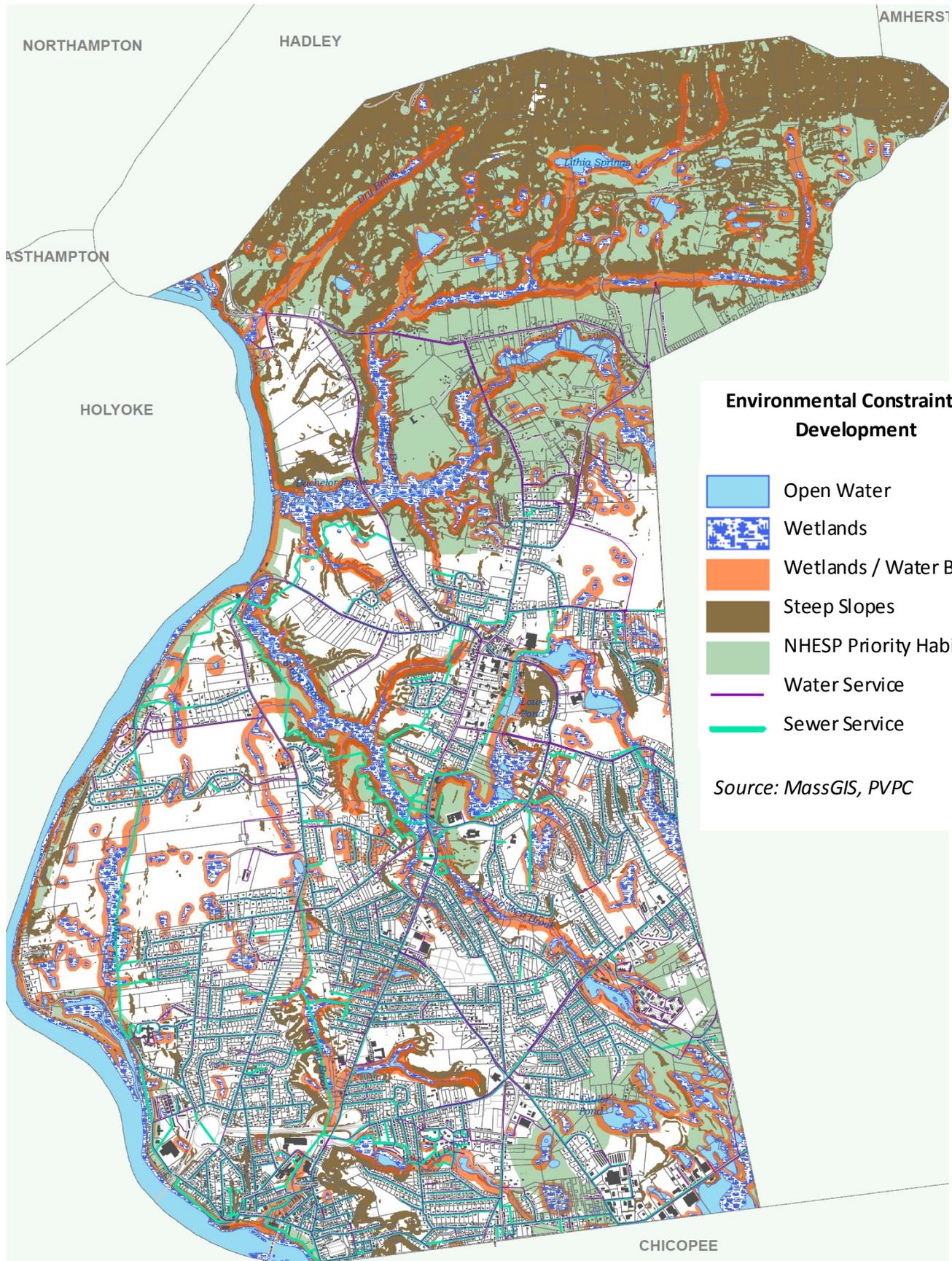
Wetlands and Vernal Pools

Wetlands are valuable because of the role they play in filtering water, slowing runoff, and as critical habitat. South Hadley's wetlands generally lie in floodplains along creek systems, such as Batchelor Brook, Stony Brook, White Brook, Buttery Brook, and Leaping Well Brook. In addition, there are significant wetlands along New Ludlow Road in the southeast corner of town, and smaller scattered wet areas west Lathrop/Alvord Street. Development can occur in wetlands, but mitigation or wetland replication may be required by the local conservation commission, which may add significant expense to proposed development projects. Vernal pools are ephemeral wetlands that fill annually from snowmelt, rain, and the rising groundwater of spring and early summer – they provide breeding habitat for many rare woodland amphibians and reptiles.

South Hadley's Conservation Commission reviews projects within 100 feet of wetlands and vernal pools and within 200 feet of open water, for adverse impacts and may regulate any such development, which can add significant expense to proposed development projects.

Natural Heritage & Endangered Species Program (NHESP) Priority Habitat

The Massachusetts Division of Fisheries and Wildlife responsible for the conservation and protection of hundreds of species in the state and the natural communities that make up their habitats, especially those officially listed as Endangered, Threatened or of Special Concern in Massachusetts. Priority Habitat in South Hadley is concentrated in the north third of town, along the Holyoke Range and Batchelor Brook. Habitat also appears along the Connecticut River shore, along Stony Brook, and



around the ponds and wetlands in the southeast corner of town. Any project within these areas that includes soil or vegetation alteration, grading, excavation, construction of buildings or structures, conversion of agricultural land, dock installation, dredging, pond vegetation management, beach nourishment, bank stabilization, or construction or removal of dams must file with the state for review and approval.

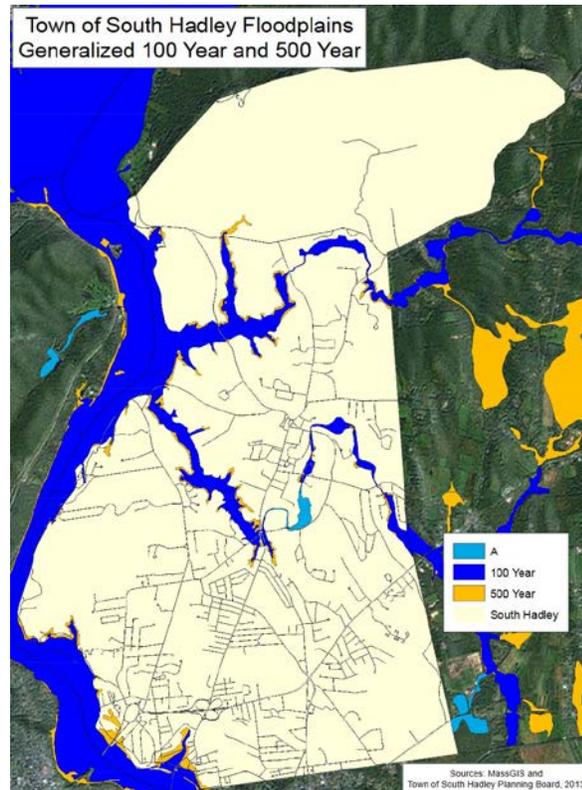
Floodplains and Flood Hazard Areas

Flood areas are those areas designated by FEMA to be susceptible to overflow of streams during 100-year flood events (those having a 1% or greater chance of happening in a given year). In South Hadley, these lie close to the Connecticut River, along lower Buttery Brook, and along the length of Stony Brook and Batchelor Brook. Existing development in floodplains should purchase flood insurance to limit financial exposure (mortgage companies usually require flood insurance purchases), which can be costly. New construction is often limited or faces expensive methods of raising enclosed buildings above the flood level.

Water Supply Overlay District

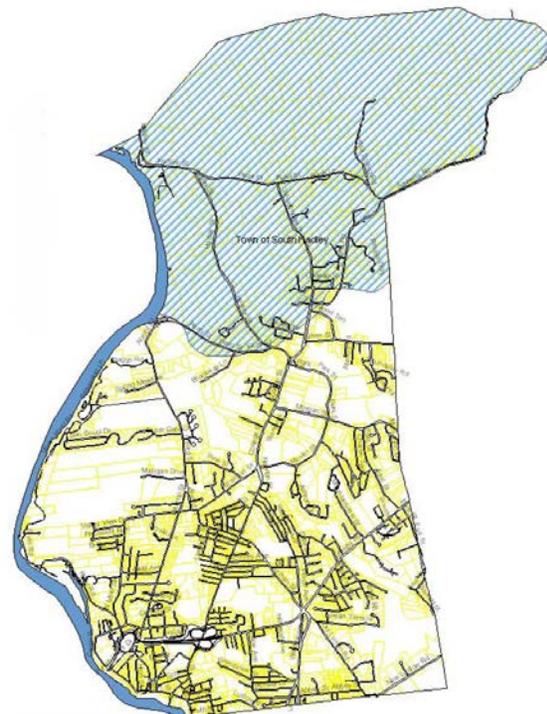
The Town has established a water supply overlay zoning district to protect surface and groundwater resources from land uses and building practices which may reduce the quality and quantity of water resources. The district overlays the northern third of town, and limits residential density to 10,000 square feet of lot area per bedroom or 40,000 square feet, whichever is greater, where it is not serviced by public sewerage.

Flood Hazard Areas



Source: FEMA

Water Supply Protection Overlay District Boundary



Source: Town of South Hadley.

Protected lands

South Hadley contains several conservation areas aimed at protecting land from development for recreation, agriculture, water supply, and wildlife. The largest of these areas is comprised of Skinner and Holyoke Range State Parks in the north, which are controlled by the Mass. Department of Conservation and Recreation. Other significant conservation areas include Batchelor Brook Resource Area, Black Stevens Conservation Area, Bagg-Pierce Wildlife Sanctuary, and Bynan Conservation Area.

South Hadley Conservation Areas

1. Bachelor-Stony Brook Conservation Area
2. Bynan Conservation Area
3. Bagg-Pierce Wildlife Sanctuary
4. Warner Conservation Area
5. Titus Pond Conservation Area
6. Carver Conservation Area
7. Jones Conservation Area
8. Newton Conservation Area
9. LeBlanc Conservation Area
10. Mount Holyoke Range Conservation Areas
11. Trompke/Stony Brook Conservation Area
12. Hawkins Bird Sanctuary
13. Gormally Conservation Area
14. Popp Conservation Area
15. Black Stevens Conservation Area
16. Bachelor Brook (East)

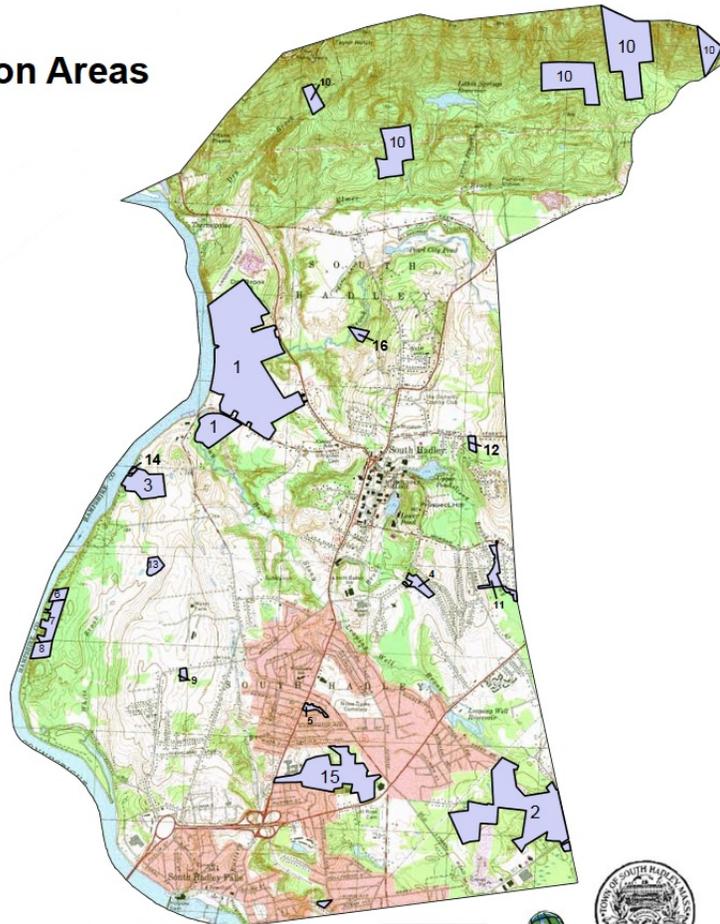


1 in = 4,917 ft



GIS Data Sources:
SH Conservation Commission
Mass GIS

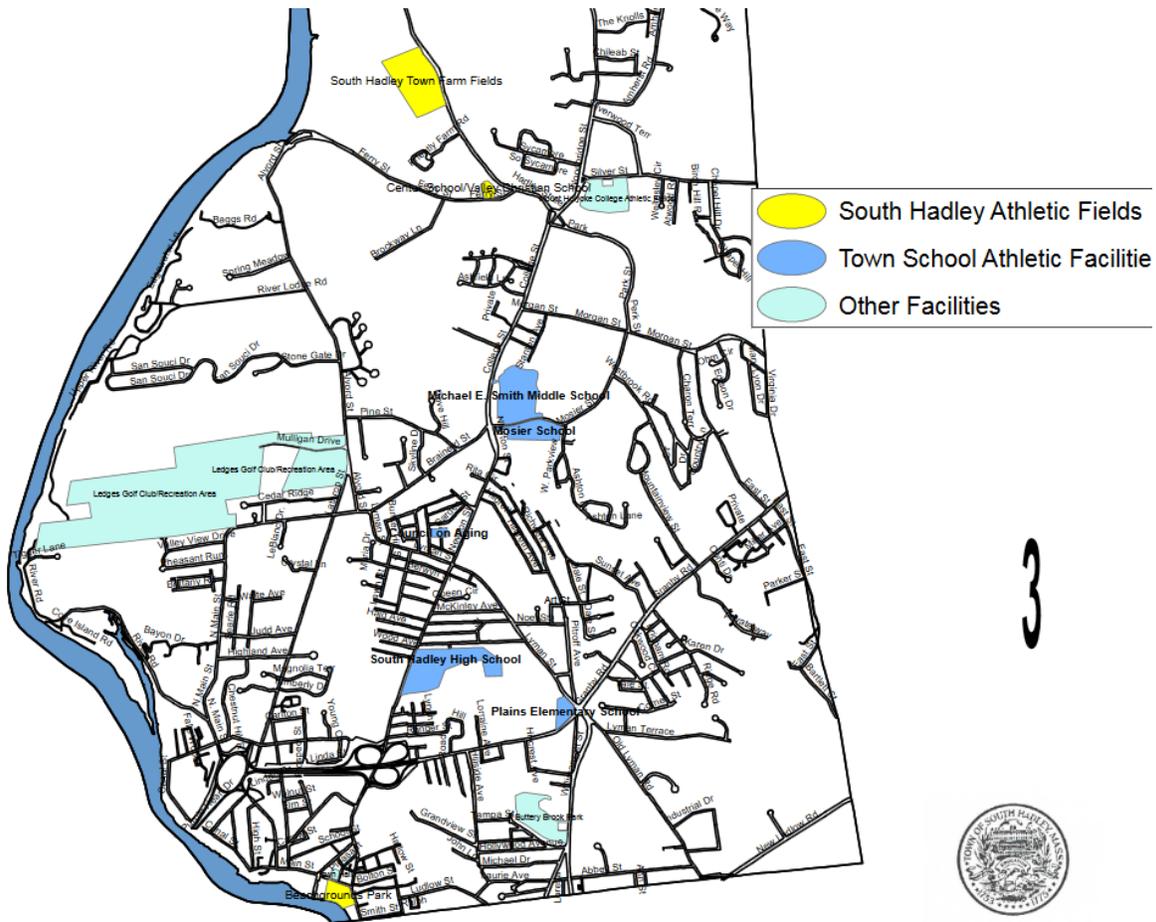
South Hadley Conservation Commission
March 2009



2/15

In addition to public-controlled conservation land, the Town controls several large parcels for recreation uses, including the town-owned Ledges Golf Course and several school playing fields. Beyond these properties, several large agricultural properties have sold development rights under the state’s Agricultural Preservation Restriction (APR) program. These sites include McCrays Farm (2 parcels, 232 acres total) along River Lodge Road and Alvord Street and Cournoyer Farm on Alvord Street.

South Hadley Parks and Recreation Facilities



Source: South Hadley Recreation Department.

Transportation Systems

The major thoroughfares in South Hadley are US Route 202 and State Routes 116, 47, and 33. Two bridges (US 202 and Route 116) connect South Hadley to Holyoke, and only two roads (Rt 47 and 116) connect South Hadley to Hadley and Amherst to the north. All of these roads carry commuter traffic from town as well as from neighboring communities. Capacity exists to support additional residential development, however certain intersections may require improvements depending on projected traffic impacts. As a general rule, increasing housing in existing walkable mixed-use locations will produce lower impacts than removed, single-use development, but even then design of new development is critical for inducing non-auto trips.

The spine of South Hadley along Route 116, including Village Commons, the 33/116 intersection, and South Hadley Falls is well-served by Pioneer Valley Transit Authority routes that connect to major centers and universities outside town. Service off this main route is not frequent if it exists at all.

- *Tiger Trolley*. Village Commons to Holyoke Transportation Center via Woodlawn Plaza, Big Y, and South Hadley Falls.
- *R-29*. Amherst to Holyoke Mall via SR 116, serving UMass, Amherst College, Hampshire College, Mount Holyoke College, and downtown Holyoke.
- *X-90*. Holyoke and South Hadley Falls to Chicopee, Springfield, and Easthampton.
- *Route 38*. Amherst to Mount Holyoke College.
- *Route 39*. Northampton to Mount Holyoke College, via Hampshire College.

South Hadley is actively planning for bicycle and pedestrian improvements, seeking to create a connected system of bicycle infrastructure across the town.

Water and Sewer Infrastructure

South Hadley has two public water systems and a public sewer system. However, these do not service the northern third of town, where much of the undeveloped land of the town remains. Connecting this area would be prohibitively expensive, and thus residential development in this area will be limited in density by septic regulations as well as the Water Protection Overlay bylaw.

Considered together, environmental constraints, conserved land, and infrastructure limitations removes most of the “green field” development sites of South Hadley from potential residential development. The remaining unconstrained and undeveloped land consists of small infill sites, and a few larger agricultural parcels west of Alvord Street. These alone are not likely to supply the town with enough affordable housing units to meet the 10% contribution under MGL Chapter 40B. In addition, the town will need to rely on infill development and redevelopment of under-used sites. A look at the town’s land use regulations helps show where this is currently possible.

3.4 Land Use Regulations

Zoning has a huge influence on housing development patterns, housing variety and choices, and thus housing affordability. Zoning regulations substantially determine the location, size, and type of housing in a community, which, in turn, has a substantial influence on housing cost. South Hadley’s zoning bylaw varies regarding the permissibility of residential uses:

- Single-family housing is allowed by right in all residential districts, in the Agricultural District, and in the Business A and B Districts.
- Conversion from single-family to two-family is permitted in Residence B and Business A and B Districts by right, but requires a special permit in the Residence A-2 and Agriculture Districts.
- Multi-family dwellings are allowed by right in Residence B (two-family) and Residence C (three-family) but only by special permit in all other residential and in the Business A and B districts.
- Residential uses (single-family, two-family, three-family, and multi-family) are allowed in the Business C District, but only by special permit, and then only as part of a mixed-use project.
- Continuing care retirement developments are only allowed in Residential A-2, and only by special permit.

South Hadley Zoning Use Table – Residential Uses

	Agric.	Residential Districts				Business Districts			
		A-1	A-2	B	C	A-1	A	B	C
Single-family dwelling	Y	Y	Y	Y	Y	N	Y	Y	SP*
Conversion of single-family to two-family	SP	N	SP	Y	N	N	Y	Y	N
Two-family dwelling	N	SP	SP	Y	N	N	SP	SP	N
Three-family dwelling	N	SP	SP	SPR	Y	N	SP	SP	N
Multi-family dwelling	N	SP	SP	SP	SPR	SP	SP	SP	SP*
More than one building for dwelling purposes	N	SP	SP	SP	SPR	SP	SP	SP	SP*
Continuing Care Retirement	N	N	SP	N	N	N	N	N	N
Flexible Residential Development	SP	SP	SP	SP	SP	N	N	N	N

*Y = Permitted; N = Prohibited; SPR = requires Site Plan Review; SP = requires Special Permit
* only as part of a mixed-use development.*

South Hadley’s dimensional standards also vary widely, especially for multi-family developments. In particular, special permit uses in Residence A-1 and A-2 (namely, multi-family developments with 2+ units and flex developments) require two acres of lot area. Residence B, which covers the older and denser part of town, requires 3000 sf per unit PLUS 300 sf of lot area, which can quickly add up, making infill development of multi-family uses difficult or impossible.

South Hadley has a more innovative design option in its Flexible Residential Development, which allows for units to be clustered on smaller lots while preserving the remainder of lot as open space or farmland. The ordinance also allows density bonuses for increased land conservation and a 25% unit bonus for providing 25% affordable housing units, while allowing waivers of normal infrastructure design standards. Unfortunately – and this is common in communities with similar provisions – flex development is the more arduous process, requiring a special permit and complex design work. Many developers would prefer to dependably building large lot houses and avoid the uncertain flex provisions. Switching this, so that flex development is permitted by-right and underlying large lot development requires a special permit may fix this problem.

Another innovative feature is South Hadley’s recent addition of a South Hadley Falls Smart Growth District, which follows DHCD’s policies under MGL Chapter 40 R. Nominally it encourages small lot, multi-family, and mixed uses within historic South Hadley Falls, with density bonuses, many by-right uses, parking exemptions, and adaptable standards for conversion of existing buildings. Moreover, it requires affordable housing – 20% of sales units, 25% of rental units. This was a big leap forward for South Hadley. While it is too early to know how successful the ordinance will be in creating affordable units, it might provide a model for other opportunity locations in town.

South Hadley Dimensional Standards

	Agric.	Residential Districts			
		A-1	A-2	B	C
Minimum Lot Area	30,000	22,500(b)	12,500(b)	7,500(c)	87,120(c)
Minimum Lot Frontage	150	125	100	75	-
Max. Bldg. Coverage	30%	30%	40%	40%	20%
Max Impervious Coverage	50%	60%	65%	70%	50%
Setback - Front	40(a)	40(a)	25(a)	15(a)	30
Setback - Side	20	20	10	10 (d)	50
Setback - Rear	25	25	20	20	50
Max Height (Stories/Feet)	3/35	3/35	3/35	3/45	3/35

(a) may vary by context.

(b) special permit uses need 87,120sf and other larger dimensional reqs.

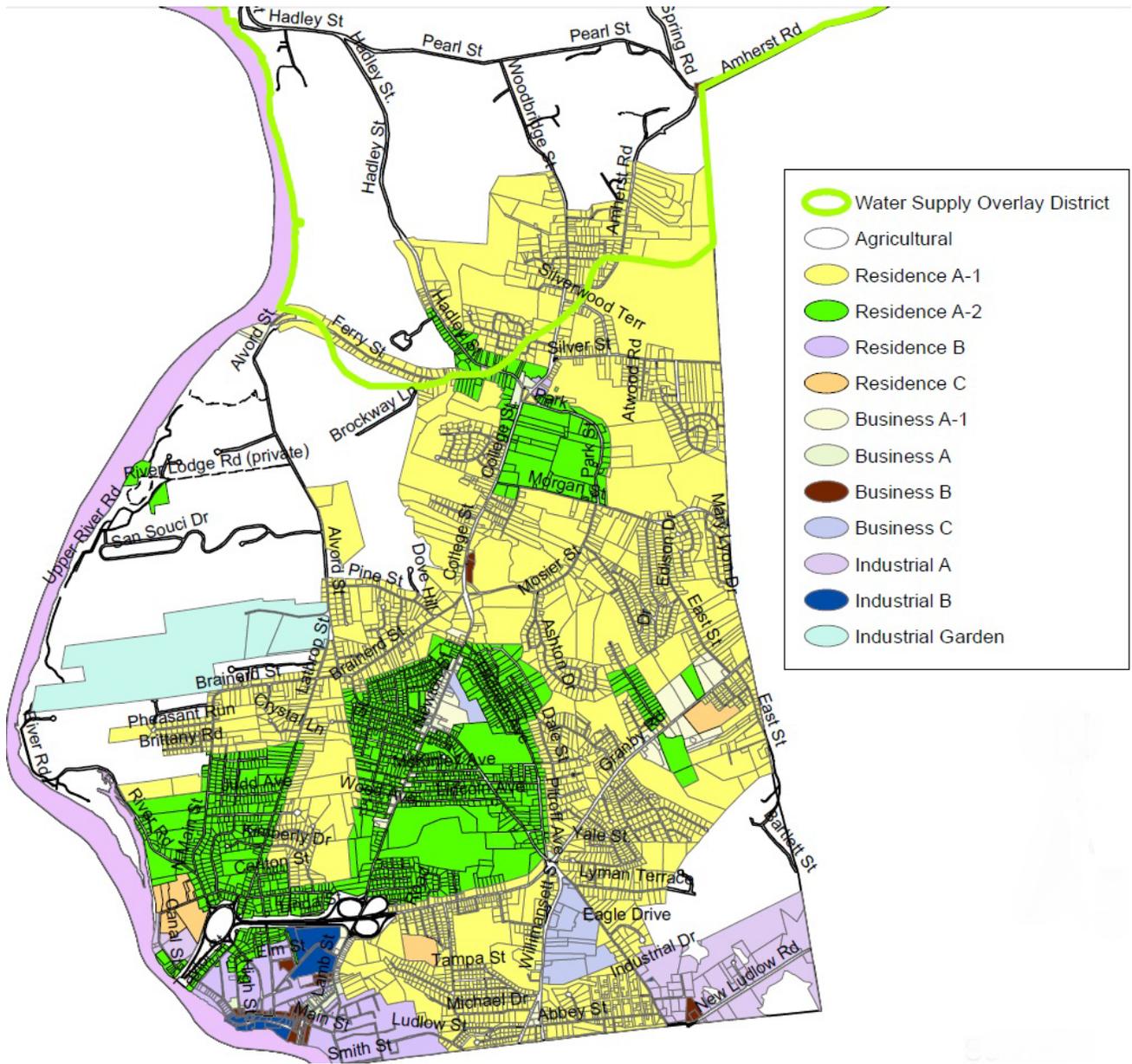
(c) 3000sf per unit + 300sf per bedroom.

(d) lower for 1-2 story buildings, 50ft for special permit uses.

In particular, by allowing residential uses in the Business A and Business B zoning districts, the Zoning Bylaw could encourage mixed-use developments. However, the bylaw requires any development located in these two districts which has residential uses to comply with the more stringent Residence B zoning district’s dimensional limits. This imposition of more stringent standards could discourage mixed-use developments – reimagining zoning regulations for underperforming commercial locations could help these sites accommodate more housing, affordable or otherwise. Ensuring that redevelopment of these sites follows design guidelines to produce truly pedestrian and mixed-use developments will help lessen the impact of densification while allowing the market to meet a growing demand for this type of housing.

As for other affordable housing zoning provisions, many towns have found accessory dwelling units (a unit created within or on the property of an existing single-family dwelling) useful for creating subsidy-less affordable housing, especially for aging family members or adult children to remain living close to family. These also give homeowners a source of rental income, helping to make existing housing more affordable. Specific standards can be applied for size, unit design, location, ownership, and parking beyond those current by-law standards. If deed-restricted with defined terms of affordability, accessory apartments can also count towards the SHI. Accessory apartments often have their own entryways and bathrooms and may or may not have their own cooking facilities. There are no provisions in the South Hadley Zoning Bylaw for accessory dwelling units, beyond conversion of a single-family dwelling to a two-family.

South Hadley Zoning Map



Source: South Hadley Planning Commission.

4. HOUSING ACTION PLAN

4. Housing Action Plan	45
4.1 Overview	45
4.2 Affordable Housing Production Goals	Error! Bookmark not defined.
4.3 Potential Locations for Affordable Housing Development	Error! Bookmark not defined.
4.4 Recommended Actions	Error! Bookmark not defined.
4.5 Schedule of Action	Error! Bookmark not defined.
Compliance with DHCD’s Housing Production Plan Approval Criteria .	Error! Bookmark not defined.