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Town of Dunstable
**Housing
Production
Plan**
for 2023-27

Town of Dunstable Housing Production Plan for 2023-2027

Acknowledgements

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Executive Summary

The Town of Dunstable requested the assistance of the Northern Middlesex Council of Governments (NMCOG) in developing a Housing Production Plan (HPP) that meets the requirements of **760 CMR 56.03, Methods to Measure Progress Toward Local Affordable Housing Goals**, part of the Massachusetts Executive Office of Housing and Livable Communities (EOHLC, formerly the Department of Housing and Community Development, DHCD) regulations implementing the Massachusetts General Law (M.G.L.) Chapter 40B, Sections 20 through 23, also known as the *Comprehensive Permit Statute*. Through funding provided by the EOHLC under the District Local Technical Assistance (DLTA) program, NMCOG staff worked closely with Town staff, the Planning Board, the Select Board, and the public during 2022 to complete this plan.

In meeting the Chapter 40B statute and regulation for affordable housing production, EOHLC requires that each municipality develop a five-year plan consisting of a Comprehensive Housing Needs Assessment, Affordable Housing Goals, and Implementation Strategies. The HPP must have a goal of achieving 10% of the Town's total year-round housing units on its Subsidized Housing Inventory (SHI). As of 2010, the Town had 1,085 year-round housing units, meaning it has a goal of 109 Subsidized Housing Inventory (SHI) units at the time of writing.

The Town's latest (May 2022) Subsidized Housing Inventory (SHI) count contained no affordable units. Because Dunstable has not exceeded the 10% statutory minima, the state's Housing Appeals Committee (HAC) may overturn decisions by the Zoning Board of Appeals on Comprehensive Permit projects. Furthermore, this 10% goal will be adjusted upward when the final 2020 Decennial Census counts are released. Even more critically, the Town is striving to ensure to fill gaps between the affordable housing supply and housing demand that exist, providing accessible and affordable housing to community members with a range of incomes, household characteristics, and demographic qualities. This is why it is so important to continue to add affordable housing through the Local Incentive Program (LIP), by approving Comprehensive Permit projects, or through other means.

The *Dunstable Housing Production Plan for 2023-2027* outlines a housing production schedule that addresses the community's local housing needs, while also meeting the state's requirements as outlined under Chapter 40B and 760 CMR 56.03. With the adoption by the Dunstable Planning Board and Select Board, this document is being submitted to EOHLC for their final approval.

A. How was the Dunstable Community Involved in the Plan's Creation?

This plan was driven by community input led by the Dunstable Affordable Housing Committee. The planning process started in 2022 with a literature review of other plans that were driven by public engagement, such as 2018's *Dunstable Master Plan*. A draft Comprehensive Needs Assessment was created based on this review and other public and proprietary data. The Affordable Housing Committee met several times to review progress and guide this process.

NMCOG and the Affordable Housing Committee then created a packet of key data and a Housing Needs Survey that was announced at the Special Town Meeting on November 14, 2022. A paper survey with an optional digital link was handed out at the Town Meeting, then the digital version was promoted via Nextdoor, Dunstable's Facebook Page, the *Neighbor to Neighbor* newsletter, and at Select Board and

Planning Board meetings. Paper copies with a digital link were also available at the Public Library and Town Hall. The survey closed on December 24, 2022 and received 79 responses.

After the NMCOG and Affordable Housing Committee team developed a vision and goals based on the Comprehensive Needs Assessment and results of the survey, they called a special meeting of the Affordable Housing Committee on June 26, 2023. This meeting, including links to the survey results and key findings from the Comprehensive Needs Assessment, was advertised through the same channels as the survey. More than 20 Dunstable community members attended the meeting. The meeting started with a presentation, then NMCOG staff broke attendees into smaller groups to discuss the proposed vision and goals one-by-one. The meeting concluded with both groups reporting out the conclusions of their discussions and participating in a Question and Answer session.

Several members of the public suggested sharing a Frequently Asked Questions (FAQ) document. A FAQ was integrated into a summary of the results of that meeting. The summary and the draft Housing Goals Section was then shared. The subsequent hearings at the Planning Board and Select Board were advertised through similar methods to the survey and June 26 Affordable Housing Committee meeting.

B. Housing Demand and Housing Supply: Comprehensive Needs Assessment

The Comprehensive Housing Needs Assessment is meant to analyze existing and projected housing demand against existing and projected housing supply, including the resources available to the town and the constraints facing the town. It guided the creation of the rest of the plan. Seven major findings came from the Comprehensive Housing Needs Assessment, summarized below:

Dunstable had no Subsidized Housing Inventory (SHI) units as of August 2023.

Despite the existence of the Community Housing requirement, Dunstable has had no Subsidized Housing Inventory (SHI) units developed as of August 2023. However, at the time of this writing there is one project in process being developed, which includes one subsidized unit; additionally, payments have been made to the Affordable Housing Trust Fund under the bylaw. There have also been positive responses to the Request for Proposals for a multifamily development which will include SHI units in the Mixed-Use District.

There are a significant number of residents at very low incomes and extremely low incomes, and their housing needs aren't being met.

Over the 2015-2019 period, 210 Dunstable households, or 18% of all households, were estimated to have incomes at or below 80% of the Area Median Family Income (see Table 12). These include an estimated 60 Extremely Low Income households, 75 Very Low Income households, and 75 Low Income households. For reference, the Greater Lowell Fair Market Rent Area Median Family Income was \$132,400 in 2023. At the lowest end of the income spectrum, an estimated 1.4% of the population, or 41 Dunstable residents were in poverty (see Table 14). There is not enough housing in Dunstable that is affordable to these populations. In 2015-19, 83% of Extremely Low Income households in Dunstable were severely cost burdened and 27% of Very Low Income were severely cost burdened (see Table 31),

spending more than half of their income on housing costs. An additional 7% of Extremely Low Income households and 53% of Very Low Income were moderately cost burdened, paying between 30% and 50% of their income on housing costs. In total, an estimated 264 Dunstable households (22%) were moderately or severely cost-burdened during the 2015-2019 period.

Homeownership is increasingly out of reach for the median income earner.

Limited housing production in Dunstable results in median sales price no longer affordable to the median household, let alone to many young families just starting out. The 2022 median single family home (\$719,000 in 2022) requires an income of approximately \$191,440 to be affordable, but an estimated 41% of total owner households (443 households), made less than \$150,000 per year.¹ In other words, the median single family home is unaffordable for at least 41%, and likely a higher proportion, of the owner households living in town. Similarly, the current median gross rent in Dunstable is unaffordable for an estimated 57% of the renter occupied households living in town. These high costs may result in difficulty for young families to find housing in Dunstable. The small number of households with heads of household 15 to 34 years is particularly notable. There were 6.9% households (family and nonfamily combined) in this cohort in Dunstable in 2017-21. During the same period, there were 17% households in this cohort in Greater Lowell (12% excluding the City of Lowell).

Two-family housing is not allowed in 97.1% of the town, and two acre minimum lot sizes are required for single family houses.

Two-family housing is not allowed in the Single Family residence and Commercial Recreational zoning districts outside the Town Center District overlay district and the Mixed-Use District overlay district. This area covers 97.1% of the town. As a result, an estimated 98% of all housing units in Dunstable were single family homes or mixed-use with a single unit according to NMCOG's analysis of 2022 assessor's data. Furthermore, all 74 new housing units that were permitted between 2012 and 2021 were single family detached dwellings. This points to a need for more diverse housing types to make Dunstable more accessible for different types of households. In addition, the two acre minimum lot size requirement for single family homes likely incentivizes larger, more expensive home construction.

Dunstable does not reflect the diversity of other neighboring suburban and rural communities in the region, raising fair housing concerns.

Dunstable's proportion of White, non-Hispanic or Latino/a residents is significantly higher than its peer suburbs in the region and the proportion of other race/ethnicity groups are lower. This suggests that there are factors such as lack of housing choice, housing unaffordability, zoning policy, or mortgage lending practices that prevent households with People of Color moving to the community.

¹ Source: U.S. Census Bureau, 2017-21 American Community Survey, Five-Year estimates, Table S2503. Data does not break down incomes by tenure above \$150,000.

Dunstable has a growing senior population that may need affordable and fully-accessible housing.

Households headed by individuals aged 65 years and older are a fast growing proportion of all Dunstable households. Households with heads of household age 65 years and older have increased as a proportion of total family households from 12% in 2000 to an estimated 25% in 2017-2021. MassDOT projects this proportion to grow to 35% by 2050. This Housing Production Plan needs to be sensitive to the needs of elders and those with disabilities in considering future affordable housing developments. This needn't mean housing that is age- or disability- restricted. Rather, it indicates a need for ensuring housing is accessible, ideally within accessible neighborhoods that allow seniors or people with disabilities a variety of accessible transportation and recreation options. It may also indicate a need for supportive programs, including providing options to age in place or downsize without moving out of town.

Infrastructure capacity varies across the town, and maintaining a high quality of Town services is important.

Although water and transportation capacity and lack of a public sewage system do not directly limit the production of affordable housing in Dunstable, these capacities are not evenly distributed across the town. The public water supply is limited to around 102 connections, and extensions of the existing supply lines along with additional connections would be required to service new dwellings outside of the current service area. A lack of suitable water supply may hinder denser development patterns including multifamily dwellings, subdivisions, and mixed-use developments with strong potential for affordable housing development. In addition, response at public meetings and through the survey indicated the importance of maintaining high quality of services, including infrastructure, schools, and emergency response as the town grows and changes. With that in mind, the Town may consider different approaches to mitigate these capacity issues and expand capacity in targeted areas to reach its housing goals.

C. What Dunstable Wants to Achieve: Affordable Housing Goals

Based on the above findings and public outreach, NMCOG and Town staff developed an Affordable Housing Vision and a set of 15 goals. The vision is as follows:

Dunstable will be a community that has a balanced mix of housing that is appropriate and accessible to all types of households. We will provide homes for all stages of life, including starter homes suitable for young families and units that are accessible and affordable to seniors, including multifamily housing. Our housing will be inclusive, with options for all. As Dunstable grows, it will meet housing needs while continuing to strengthen the town center and retaining its rural design aesthetic, working farms, and open space.

The goals are as follows:

- Goal 1:** Produce an average of at least 6 and preferably 12 SHI units each year.
- Goal 2:** Create safe, comfortable, affordable units through new construction, conversion, or adaptive reuse, especially those that are targeted to households making an income at 60% AMI or lower.
- Goal 3:** Build awareness about affordable housing needs, create opportunities to build consensus on how to meet those needs, and clearly communicate housing-related issues and opportunities to provide feedback to community members.
- Goal 4:** Ensure newly-created income-restricted units are monitored, maintained as affordable, and continue meeting all the requirements of their respective deed restrictions.
- Goal 5:** Create more diverse types and sizes of ownership units, including types such as smaller single family detached, duplexes, and townhouses at accessible prices that could serve as “starter homes”
- Goal 6:** Develop ladders to homeownership in Dunstable both for Dunstable residents and those who may wish to settle in Dunstable.
- Goal 7:** Increase the land that allows types of housing other than single family detached by right or by special permit while protecting specific Areas of Critical Environmental Concern (ACEC), such as the Petapawag ACEC.
- Goal 8:** Provide equitable access to affordable homeownership and rental homes suitable for a variety of household types, including single bedroom apartments and homes with multiple bedrooms suitable for families with children.
- Goal 9:** Ensure that mortgages or leases are monitored for discrimination and ensure Dunstable housing is welcoming and accessible to all.
- Goal 10:** Actively address racial and other disparities by including people of diverse races, ethnicities, ages, and backgrounds in housing decision-making processes.

Each of the above goals have tracking indicators described in **Chapter 3: Housing Goals**.

D. How Dunstable Plans to Meet its Goals: Implementation Strategies

The final chapter of the plan details the following:

- A. **Implementation Strategies**, which are specific actions the town or other agencies will undertake to meet the goals articulated in the previous section;
- B. **Attributes of Proposed Residential or Mixed-Use Developments**, which is a list of attributes such as performance standards and location to guide siting and features of housing development;
- C. **Proposed Modifications to Zoning Districts**, which is a list of Implementation Strategies that modify zoning;

- D. **Land with Potential for Affordable Housing**, which are lists of specific parcels chosen based on the attributes described in Subsection B that the town will encourage Comprehensive Permit (40B) developments or will pursue issuing Requests for Proposals (RFPs); and
- E. **Regional Collaborations**, which is a list of Implementation Strategies that will require or would benefit from regional collaborations.

These include 23 specific, actionable strategies the Town or its partners may undertake over the next five years organized into an action plan. High priority actions include the following:

No	Strategy	Goals Advanced	Lead, Partners	Priority	Target Completion
1.1	Encourage Comprehensive Permit (40B) Developments that meet the attributes described in Section 4.C.	1, 2, 4, 5, 12	Town Administrator, AHC, ZBA	High	Ongoing Starting Now
1.2	Strengthen the Administration of the Affordable Housing Trust Fund and work with the Trust to develop an action plan.	1, 2, 4, 5, 6, 7	Town Administrator, AHT	High	2023
2.1	Track the development and use of Accessory Dwelling Units.	1, 2, 5, 7, 8, 11, 12	Town Administrator	High	Ongoing Starting Now
3.2	Increase infrastructure capacity in targeted areas.	13	Town Administrator	High	2028
4.2	Broadly advertise board/committee member vacancies to reach underrepresented community members.	3, 10	Select Board, Town Administrator	High	Ongoing Starting Now
4.3.	Provide education on Housing Choice Community Designation to boards and committees that work with land use or housing	1	AHC, Town Administrator	High	2024
6.1	Participate in the Regional Housing Workgroup to help the Town of Dunstable achieve and maintain affordable housing goals through interregional partnerships.	3, 4, 9, 10, 11, 12, 14, 15	Town Administrator, AHC	High	Ongoing Starting Now
6.2	Strengthen communication among local and regional housing entities.	3, 6, 9, 10	AHC, Town Administrator	High	Ongoing Starting Now

A full listing of all strategies, including the desired attributes of proposed residential and mixed-use developments and land with potential for affordable housing, is in **Chapter 4: Implementation Strategies**.

CHAPTER 1

Introduction

A. Why Plan for Housing?

The development of housing that is accessible and affordable to community members with a range of incomes, household characteristics, and demographic qualities is critical to successful and sustainable community planning. Accordingly, the Town of Dunstable aspires to create a strong record of proactively planning for housing options. The *Dunstable Housing Production Plan for 2023-2027* aims to advance that goal, complimenting and building upon the *Dunstable Master Plan* adopted in 2018. It serves as a framework for considering Comprehensive Permit projects, zoning changes, Affordable Housing Trust Fund (AHTF) expenditures, Community Preservation Act (CPA) fund expenditures, and other actions the Town and its partners can undertake to increase the supply of affordable housing.

The format of a Housing Production Plan (HPP) is rooted in the Massachusetts Regional Planning Law (Chapter 774 of the Acts of 1969, also known as Chapter 40B of the Massachusetts General Laws), enacted in 1969. This law is designed to “increase the supply and improve the regional distribution of low- or moderate-income housing by allowing a limited override of local requirements and regulations which are inconsistent with local and regional affordable housing needs”.² The law allows a Zoning Board of Appeals (ZBAs) to grant a “**Comprehensive Permit**” which integrates all local approvals into a single permit, typically permitting additional density than the zoning would normally allow. In some cases, the state has the power to override a local decision on a Comprehensive Permit project.

While many residents understand the critical need for more affordable housing options in Dunstable and across the region, housing developments proposed via the Comprehensive Permitting process are sometimes controversial. Consequently, this HPP seeks to build consensus and create an agreed-upon strategy adopted by the Planning Board and Select Board for promoting affordable and accessible housing in areas and forms that will enhance the community.

The HPP also serves an important regulatory function: the development and approval of a local HPP is an integral component of achieving “**safe harbor**” status. Safe harbor refers to conditions under which a Zoning Board of Appeals (ZBA) has greater power in controlling future Comprehensive Permit projects because a decision by the Zoning Board of Appeals to deny an application will be considered “consistent with local

HOW DOES DHCD DEFINE AN HPP?

The Massachusetts Executive Office of Housing and Livable Communities (EOHLC) defines an HPP as “a proactive strategy for planning and developing affordable housing”. According to EOHLC, “the community should: (1) develop a strategy which will be used to meet its affordable housing needs in a manner consistent with the Chapter 40B statute and implementation requirements; and (2) produce housing units in accordance with its HPP.” Once approved by EOHLC, an HPP is valid for five years.

² Department of Housing and Community Development (DHCD) (Now Executive Office of Housing and Livable Communities (EOHLC)), 2016

DUNSTABLE'S SUBSIDIZED HOUSING

need," and upheld by Executive Office of Housing and Livable Communities's Housing Appeals Committee. Safe Harbor status includes both *statutory minima* and *regulatory safe harbors*.

Statutory Minima

Safe Harbor status includes three statutory minima:

- **Housing Unit Minimum:** more than 10% of a community's total housing units are on the Subsidized Housing Inventory (SHI)
- **General Land Area Minimum:** Sites of (Subsidized Housing Inventory (SHI)-eligible units (pro-rated for partial sites) comprise more than 1.5% of the total land area zoned for residential or commercial or industrial use
- **Annual Land Area Minimum:** Project would result in low- or moderate-income housing on sites comprising more than 0.3% of the town's land area or ten acres, whichever is larger, being constructed in one calendar year

There are only rare instances of the land area minimum thresholds being met. However, 76 cities and towns have met the housing unit minimum and 14 municipalities have certified Housing Production Plans (as explained in the next Section).

The Town of Dunstable's goal of 10% of the 1,145 year-round housing units recorded in the 2020 U.S. Decennial Census is 115 affordable units. The Town's latest (August 2023) Subsidized Housing Inventory (SHI) count was 0 affordable units. Because Dunstable has not exceeded the 10% statutory minima, the state's Housing Appeals Committee may overturn decisions by the Zoning Board of Appeals on Comprehensive Permit projects. Every ten years, this goal will be revised upward as the town adds more market rate year-round housing units. By beginning to add new units to the Subsidized Housing Inventory (SHI), Dunstable will not only meet the affordable housing needs described in this HPP, but also eventually achieve a "safe harbor" status.

Regulatory Safe Harbors

Dunstable may also achieve Safe Harbor through having a "**Certified HPP**". Communities may apply to have their HPP certified by the Executive Office of Housing and Livable Communities (EOHLC). A community will be certified in compliance with an approved HPP if, during a single calendar year, it has increased its number of low- and moderate-income year-round housing units by a certain amount. Certification lasts for one year if the community has increased its Subsidized Housing Inventory (SHI) units by 0.5% of year-round housing units and two years if it has increased its number of Subsidized Housing Inventory (SHI) units by 1.0%. The 0.5% goal for Dunstable is 6 units in a single calendar year, and the 1.0% goal is 11 units in a single calendar year.³ These goals are integrated into this HPP.

³ At the time of writing, EOHLC had not released the 2020 HPP Production goals. These goals may vary slightly from the goals that were estimated in this HPP. The Town of Dunstable pledges to comply with the final 2020 HPP Production goals when they are released.

**2020 Number of
Year-Round Units:**
1,145 Units

**Subsidized Housing
Inventory (SHI) Goal:**
115 Units

Current Number:
0 SHI Units
0% of total 2020 units

If Dunstable has achieved a safe harbor provision within 15 days of the opening of the local hearing for a Comprehensive Permit, the ZBA must provide written notice and supporting materials to the Applicant (with a copy to the Executive Office of Housing and Livable Communities (EOHLC)) that it believes it can deny the comprehensive permit because Dunstable has met a statutory minimum or qualifies under another safe harbor provision. If the Applicant wishes to challenge the ZBA's assertion, it must do so by providing written notice and supportive documentation to the EOHLC (with a copy to the ZBA). The EOHLC shall thereupon review the materials provided by both parties and issue a decision which may be appealed by either party to the state's Housing Appeals Committee. These steps all have strict deadlines and the ZBA should make sure to fully understand Chapter 40B and the EOHLC 40B Guidelines. Massachusetts Housing Partnership (MHP) developed a guidebook for this purpose in 2017.⁴

B. Overview of the Dunstable Housing Production Plan

To qualify for approval from the Executive Office of Housing and Livable Communities, an HPP must contain three main components: 1) a Comprehensive Housing Needs Assessment; 2) Affordable Housing Goals; and 3) Implementation Strategies.

1. The purpose of the **Comprehensive Housing Needs Assessment** is to determine the community context, which relies on demographic, economic, and community development (affordable housing entities, zoning, and infrastructure) data to assess the extent to which the existing housing stock meets the housing needs of a community and the capacity of the community's infrastructure to serve the housing need.

2. The **Affordable Housing Goals** Chapter identifies the community's broad objectives for housing, paying special attention to local and regional needs. This Section also sets the minimum affordable housing production goal, as determined by the total number of year-round housing units in the most recent Decennial Census. According to the recent revisions to the Chapter 40B requirements, the minimum annual affordable housing production goal is greater than or equal to 0.5% of the year-round housing stock.⁵

3. Finally, the **Implementation Strategies** Chapter of the plan builds upon the Affordable Housing Goals Chapter by identifying the desired characteristics of affordable housing, specific sites for the development of affordable housing, municipally-owned land which the community has targeted for mixed-income housing, potential zoning changes to support housing production, and regional housing development collaborations.

⁴ Chapter 40B Handbook for Zoning Boards of Appeals, Massachusetts Housing Partnership, March 2017

⁵ DHCD Guidelines for MGL 40B Comprehensive Permit Projects, Subsidized Housing Inventory, DHCD (now EOHLC), updated December 2014, and based upon Regulatory Authority 760 CMR 56.00.

C. How Do we Define Affordable Housing and Income Categories?

HOW DOES THIS HPP DEFINE AFFORDABLE UNITS?

For the purposes of this HPP, “affordable units” or “affordable housing” will refer to any units that are income-restricted and restricted to cost not more than 30% of the residents’ income. “Subsidized Housing Inventory units” will refer to units that meet all the requirements to be listed on the Subsidized Housing Inventory.

There are several definitions of affordable housing in the United States depending on whether one uses Federal or State criteria.

1. Defining Affordability through Housing Cost Burden

The United States Department of Housing and Urban Development (HUD) considers housing “affordable” if housing costs do not exceed 30% of a household’s annual income.⁶ When a household pays more than 30% of its income on housing-related costs, HUD considers it “**moderately burdened**” by housing; households spending 50% or more of their income on housing are considered “**severely burdened**”.

2. Defining Income Categories through Percentage of Area Median Income

An important measure in affordable housing is **Area Median Income (AMI)**. Area Median Income calculations are the most common way of prioritizing households for affordable housing opportunities. Housing and Urban Development has a formula for determining income thresholds based on a special measure of Area Median Income it takes called the Housing and Urban Development (HUD) Area Median Family Income (HAMFI). This HPP will use the terms HUD Area Median Family Income (HAMFI) and Area Median Income (AMI) interchangeably unless otherwise noted. HUD uses these thresholds for Section 8 and other programs, and the Executive Office of Housing and Livable Communities has adopted these thresholds for many of its programs. According to the US Department of Housing and Urban Development :

- “**Extremely low income**” households earn 30% or less Area Median Income;⁷
- “**Very low income**” households earn between 31% and 50% Area Median Income;
- “**Low income**” households earn between 51% and 80% Area Median Income; and
- “**Moderate income**” households earn between 81% and 100% Area Median Income.

3. Defining Affordable Housing through the Subsidized Housing Inventory

In assessing a community’s progress toward the Commonwealth’s 10% affordability goal, the Executive Office of Housing and Livable Communities (EOHLC) counts a housing unit as affordable if it is subsidized by state or federal programs that support low- and moderate- income households at or below 80% Area

⁶ Rental units housing costs are gross rent plus associated utilities. Owner-occupied housing costs are cost of mortgage, property taxes, and insurance. Source: US Department of Housing and Urban Development.

⁷ Defined as the greater of 30/50ths (60%) of the Section 8 very low-income limit (in other words, 30% AMI) or the poverty guideline as established by the Department of Health and Human Services (HHS), provided that this amount is not greater than the 50% very low-income limit. (FY 2014 Consolidated Appropriations Act).

Median Income. Under Chapter 40B, subsidized unit(s) are considered “affordable” and eligible for the Subsidized Housing Inventory (SHI) if they meet the following criteria:

1. The unit is administered by an approved housing program listed in the *Department of Housing and Community Development (DHCD) [now EOHLC] M.G.L. Chapter 40B Guidelines*⁸ or receive Local Initiative Program “LIP” approval;
2. The unit is restricted to households with income not exceeding 80% of the Area Median Income and subject to certain asset limitations;
3. The unit cost, inclusive of utilities, must not exceed 30% of monthly income for households not exceeding 80% Area Median Income adjusted for household size for rental units, and housing costs inclusive of principal, interest, property taxes, and other selected costs must not exceed 38% of monthly income for homeownership units (subject to other restrictions);
4. The unit includes a use restriction that runs with the land for 15-30 years minimum and has several minimum standards; and
5. The unit meets fair housing laws and Executive Office of Housing and Livable Communities (EOHLC) requirements through an approved Affirmative Fair Housing Marketing Plan.

In addition, in a rental development, if at least 25% of units are to be occupied by Income Eligible Households earning 80% Area Median Income or less, or alternatively, if at least 20% of units are to be occupied by households earning 50% Area Median Income or less, then all of the units in the rental development are eligible for the Subsidized Housing Inventory (SHI). This provision is intended to promote rental units, which are under-provided in many towns.⁹

4. Number of Bedrooms and Age Restrictions

The state’s subsidizing agencies have entered into an Interagency Agreement that provides more guidance to localities concerning housing opportunities for families with children. The agreement requires that at least 10% of the units in affordable production developments that are funded, assisted, or approved by a state housing agency have three or more bedrooms, with some exceptions such as age-restricted housing, assisted living, supportive housing for individuals, and single room occupancy (SRO), among other exceptions.

Furthermore, the Executive Office of Housing and Livable Communities (EOHLC) will not add any units that do not allow persons 18 years of age or younger to the SHI. The Department of Housing and Community Development (DHCD, now EOHLC) has stated, “It has long been DHCD [now EOLHC]’s policy and practice not to approve affordable units under the Local Initiative Program (“LIP”), including Local Action Units (“LAUs”), in age-restricted housing for persons 55 years of age or older (“55+ housing”) if selection or occupancy policies, special permits or other zoning approvals, or underlying zoning would exclude persons 18 years of age or younger from occupying those affordable units.”¹⁰

⁸ DHCD became EOLHC in 2023. This report will use whichever name is printed on the cover page of any publication for clarity.

⁹ DHCD Guidelines for MGL 40B Comprehensive Permit Projects, Subsidized Housing Inventory, updated December 2014, and based upon Regulatory Authority 760 CMR 56.00.

¹⁰ Local Initiative Program Policy Regarding Restrictions on Children in Age-Restricted 55+ Housing, DHCD memo, 2018.

According to the Comprehensive Permit Guidelines, “At the discretion of DHCD [now EOLHC], such approval may be withheld (i) if other age-restricted housing units in the community, which have been issued a Determination of Project Eligibility or which have been otherwise approved by the community remain unbuilt or unsold, or (ii) if the proposed age-restricted units, in context with the municipality’s other recent housing efforts, are unresponsive to needs for family housing.”¹¹

D. Our Methodology, Data Sources, and Demographic Definitions

1. Data Sources

The *Dunstable Housing Production Plan for 2023-2027* relies on a variety of data sources, such as:

- the U.S. Census Bureau,
- the U.S. Department of Housing and Urban Development (HUD),
- the U.S. Department of Health and Human Services (HHS),
- the Massachusetts Department of Transportation (MassDOT),
- the Executive Office of Housing and Livable Communities (EOHLC), and
- the Northern Middlesex Council of Governments (NMCOG).

The two main surveys referenced are the **U.S. Decennial Census** and the **American Community Survey (ACS)** from the U.S. Census Bureau. It is important to note that differences in sampling methodology, terminology, and timeframe can make it difficult to compare one source to another. For instance, one key difference between the U.S. Decennial Census and the American Community Survey is that the Decennial Census surveys every individual in a community, whereas the American Community Survey samples a smaller number of random households from the community. This is because the Decennial Census strives to provide precise counts of people for the purpose of Congressional apportionment, whereas the American Community Survey is designed to estimate social and economic characteristics.

These differences in sampling methodology mean that some values, such as the number of households in a community, are reported differently in the American Community Survey versus the Decennial Census. More accurate household numbers are available through the Decennial Census, because it

WHAT IS THE CENSUS BUREAU’S MARGIN OF ERROR?

Because American Community Survey (ACS) are estimates based on a sample of surveys returned by residents, each estimate has a “margin of error.” For an example, if the American Community Survey estimates 100 housing units are rentals, and there is a margin of error of 3, the Census Bureau is 95% confident that the actual number of rental households are between 97 and 103.

When there are a smaller number of surveys because the community is smaller, such as in Dunstable, the margin of error is higher. The HPP will note margins of error that are especially high.

¹¹ DHCD Guidelines for MGL 40B Comprehensive Permit Projects, Subsidized Housing Inventory, DHCD (now EOLHC), updated December 2014, and based upon Regulatory Authority 760 CMR 56.00.

samples everyone in a community. However, American Community Survey numbers still have value because the survey asks a wider variety of questions. Information on household income, for instance, is only available in the American Community Survey, and was not included as part of the 2010 or 2020 Decennial Census.

Another key difference between the Decennial Census and the American Community Survey is that the Decennial Census collects data once every ten years, whereas American Community Survey data are collected continuously. Typically, data from the Decennial Census are collected between March and August in a single year, whereas data from the American Community Survey are collected each month and reflect conditions throughout the year. This report uses “five-year” American Community Survey data, which are essentially averages of conditions over five years. Although this doesn’t provide as precise a snapshot as “one-year” data, it has lower margins of error because the sample size is larger.

Furthermore, there are differences in questions and terminology across Decennial Censuses and American Community Survey Questionnaires. For example, the Census Bureau introduced a new set of disability questions in the 2008 American Community Survey Questionnaire, which makes comparisons of disability data from 2008 or later with prior years difficult. Within the HPP, there will be an attempt to minimize any confusion about these data sources and to note where two different data sources are being used.

2. Methodology of Selecting Data Sources

In general, the *Dunstable Housing Production Plan for 2023-2027* uses Decennial Census data whenever possible. However, this does not include valuable types of information. In cases in which relevant data was not included in the 2020 Decennial Census, 2017-21 American Community Survey data is used instead.

The HPP utilizes population and household projections prepared by the Massachusetts Department of Transportation (MassDOT) and the UMass Donahue Institute with input from NMCOG. MassDOT developed these population and household projections for the Greater Lowell region (see sidebar for definition) for 2020, 2030, and 2040. These projections are based upon a statewide model that assigns a specific share of population to each Metropolitan Planning Organization (MPO) region and then to the

WHAT IS GREATER LOWELL?

It is important to compare Dunstable to and analyze the larger region, but different agencies define the “Greater Lowell” region differently, and therefore Greater Lowell statistics will differ depending on the agency producing those statistics.

For the purposes of this HPP, “**Greater Lowell**” will refer to the 9-community region of the Towns of Billerica, Chelmsford, Dracut, Dunstable, Pepperell, Tewksbury, Tyngsborough, Westford, and the City of Lowell. The “**Lowell Metro FMR Area**” is a region delineated by the U.S. Department of Housing and Urban Development (HUD) and includes Greater Lowell as defined above plus the Town of Groton.

individual communities. NMCOG staff provided comments on the model's assumptions, and the final projections were adjusted in response to those comments.

3. Definitions of Demographic Terms

It is important to clarify the definitions for terms, such as *housing unit*, *household*, and *family*. The HPP will use the U.S. Census Bureau definitions for each:¹²

Housing Unit – A housing unit may be a house, an apartment, a mobile home, a group of rooms or a single room that is occupied (or, if vacant, intended for occupancy) as separate living quarters. Separate living quarters are those in which the occupants live separately from any other individuals in the building and which have direct access from outside the building or through a common hall. For vacant units, the criteria of separateness and direct access are applied to the intended occupants whenever possible. If that information cannot be obtained, the criteria are applied to the previous occupants.

Household – A household includes all the persons who occupy a housing unit as their usual place of residence. [...] The occupants may be a single family, one person living alone, two or more families living together, or any other group of related or unrelated persons who share living arrangements. (People not living in households are classified as living in group quarters.)

Family – A family is a group of two people or more (one of whom is the householder) related by birth, marriage, or adoption and residing together; all such people (including related subfamily members) are considered as members of one family. Beginning with the 1980 Current Population Survey, unrelated subfamilies (referred to in the past as secondary families) are no longer included in the count of families, nor are the members of unrelated subfamilies included in the count of family members. The number of families is equal to the number of family households, however, the count of family members differs from the count of family household members because family household members include any non-relatives living in the household.

To simplify these definitions, "**housing units**" refers to all residential structures in the community, occupied or unoccupied. "**Households**" are all the people who occupy a housing unit, including all family or nonfamily groups. "**Families**" are defined as a group who reside together and are related, whereas "**nonfamily households**" are unrelated, for example, roommates, unmarried couples, or people living alone. For other definitions, consult the U.S. Census Bureau web page at www.census.gov.

¹² "American Community Survey and Puerto Rico Community Survey 2019 Subject Definitions," U.S. Census Bureau, 2019.

CHAPTER 2

Comprehensive Needs Assessment

The Comprehensive Housing Needs Assessment is meant to analyze existing and projected housing demand against existing and projected housing supply, including the resources available to the town and the constraints facing the town. It guides the creation of the rest of the plan and includes the following:

- A. The **Demographic Analysis** illuminates the current and projected housing needs of the population taking into account regional growth factors and includes information on household type and size, age of the population, income, and other demographic factors.
- B. A description of the amount, type, and cost of the **Existing Housing Inventory** includes the existing and projected market-rate and affordable housing.
- C. The **Housing Cost Burden Analysis** compares the income of residents and the cost of housing to determine the affordability gap of the community—in other words, analyzing whether the supply meets the demand.
- D. The Section on **Housing Issues** includes other housing challenges as identified by the community such as the physical condition of housing.
- E. The description of existing **Affordable Housing Efforts** includes a list of resources that may be called upon for housing development, setting a baseline for improvement if necessary.
- F. The **Development Constraints and Limitations** Section analyzes what may limit housing production in order to identify issues that can and should be mitigated.
- G. Finally, the **Comprehensive Needs Assessment Conclusions** Section ties everything together, summarizing the challenges and opportunities the HPP should address

A. Demographic Analysis

This analysis will utilize projections created by the Massachusetts Department of Transportation (MassDOT) in cooperation with the University of Massachusetts Lowell Donahue Institute and Metropolitan Area Planning Council (MAPC) with input from NMCOG.

These projections were created with an assumption that existing conditions would continue, including migration rates, birth rates, death rates, and existing zoning. With these inputs, the MassDOT team estimated how the region and each town would change in terms of household type, household age, and household income. Although it's hard to perfectly predict the future, these are a good “educated guess” at how the town might change in a “**business as usual**” scenario.

FAST FACTS: DEMOGRAPHIC ANALYSIS

- MassDOT projects strong growth in Dunstable households (16%) between 2020 and 2030, although Dunstable’s household and population growth has previously been lower than projected, an anomaly in the Greater Lowell region.
- The number of households with 4 or more people are shrinking, and now 37% of all Dunstable households are two-person households, representing both new families and empty nesters.
- A quickly-growing number of households are people 65 years or older living alone, and those over 80 are projected to increase considerably by 2040.
- The number of people aged 20-35 years in Dunstable is growing, but they are not currently starting new households in Dunstable. In order to start families, new housing in lower price ranges will likely be needed for this age cohort.
- An estimated 171 residents, approximately 5% of the total estimated population, were reported to have a disability, a majority of these were between 18 and 65 years old.

1. Households and Population

Over the last few decades, the population in Dunstable—as well as in the Greater Lowell region as a whole—has steadily increased. However, Dunstable’s growth has been more pronounced. According to the *Regional Strategic Plan for Greater Lowell (2011)*, between 1960 and 2010, the population in the region grew by 70% from 169,403 to 286,901. In contrast, Dunstable’s population grew by 285.8% between 1960 and 2010, from 824 to 3,179. However, population growth has slowed in recent years, growing 5.6% (or 179 people) between 2010 and 2020, less than MassDOT projected and less proportionately than the 8.1% of the Greater Lowell region as a whole. According to the 2020 Decennial Census, Dunstable had a population of 3,358.

Perhaps more important to Housing Production Plans are the growth in number of households. Table 1 below utilizes Decennial Census data for 2000, 2010, and 2020. The number of households increased substantially between 2000 and 2010 (15.2%), but that growth slowed between 2010 and 2020 (6.6% or 70 households). Similar to the population projection, this growth was lower than the projection in the previous HPP (19.6% or 208 households) and lower than the region as a whole (11.8% or 12,249 households). This resulted in a count of 1,133 households in Dunstable in 2020.

MassDOT’s recent projections forecast household growth of 16% in 2020-2030, and a slowdown to 8% in 2030-2040. Although this is higher than 2010-2020, it is less than half the 1990-2000 rate of 33.4% and just above the 2000-2010 rate of 15.2%.

Table 1: Total Number of Households, Greater Lowell and Dunstable (2000, 2010, and 2020)

Year	Dunstable	Growth Rate	Greater Lowell region	Growth Rate	Dunstable Households as a Percent of the Region
2000	923	33.4%	99,342	10.5%	0.9%
2010	1,063	15.2%	104,022	4.7%	1.0%
2020	1,133	6.6%	116,271	11.8%	1.0%

Source: U.S. Census Bureau, 2000, 2010, and 2020 Decennial Census.

2. Household Size

Projected number of households suggest how many housing units a community may need to create if current conditions continue. Analyzing household types and sizes suggest what types of housing units may be needed. According to the U.S. Decennial Census, the average household size in Dunstable decreased from 3.07 persons per household in 2000 to 2.99 persons per household in 2010 to 2.96 persons per household in 2020. In the Greater Lowell region, the average household size in 2000 was 2.77 persons per household, 2.70 persons per household in 2010, and 2.67 in 2020.

Table 2: Average Household Size in Dunstable and Greater Lowell (2000, 2010, and 2020)

Year	Dunstable	Greater Lowell
2000	3.07	2.77
2010	2.99	2.70
2020	2.96	2.67

Source: U.S. Census Bureau, 2000 and 2010 Decennial Census SF1, and 2020 Decennial Census PL 94-171.

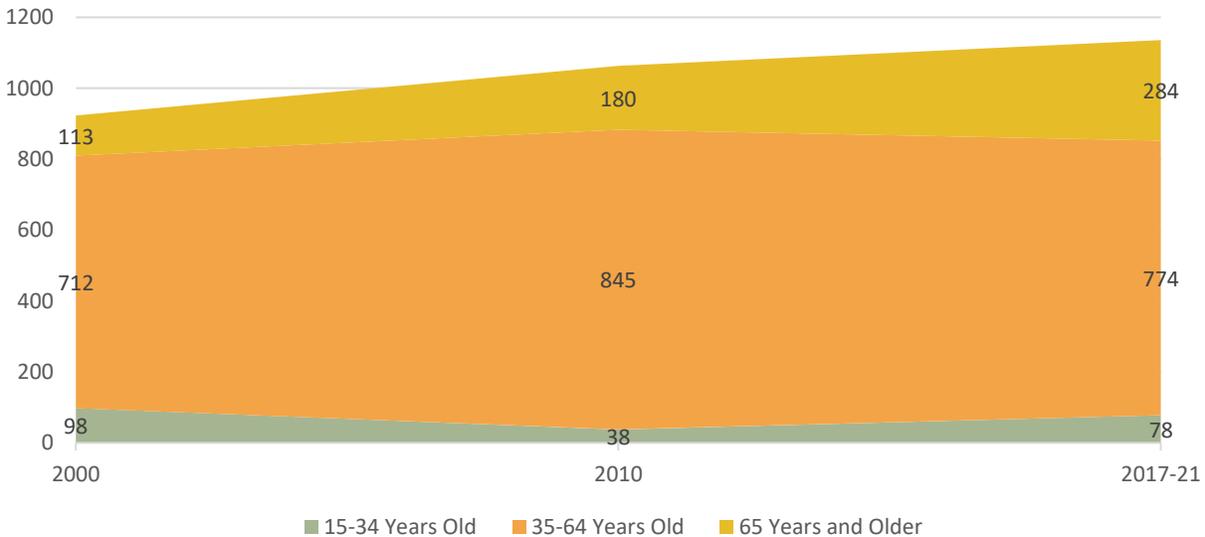
3. Head of Household Age

The age of head of householder and household characteristics provide valuable insight into not only the housing types needed now and in the future, but also what types of households Dunstable might be limiting because of currently-restricted housing options. The U.S. Census breaks the distribution of the age of heads of households into three categories: 34 years and under, 35-64 years old, and 65 years and older. **Table 3** and **Figure 1** contain information on how many households fall under these categories. Because the U.S. Census Bureau has not yet released age information at the time of drafting this Plan, the most recent American Community Survey estimate was used for 2017-21. Even though this is just an estimate, the clear trend is that the number of older households is growing, while the number of younger households stays steady or shrinks.

Table 3: Head of Household Age Distribution, Dunstable (2000, 2010, and 2017-2021)

Head of Householder Age	2000		2010		2017-2021	
	Number	%	Number	%	Number	%
15-34 Years Old	98	10.6%	38	3.6%	78	6.9%
35-64 Years Old	712	77.1%	845	79.5%	774	68.1%
65 Years and Older	113	12.2%	180	16.9%	284	25.0%
Total Households	923	100.0%	1,063	100.0%	1,136	100.0%

Figure 1: Head of Household Age Distribution, Dunstable (2000, 2010, 2017-2021)



Source: U.S. Census Bureau, 2000 and 2010 Decennial Census and 2017-2021 American Community Survey 5-Year Estimates, Table B25011.

The MassDOT projections predict that under a “business as usual” scenario, this will continue, with households with heads of household 65 Years and Older expanding to 35% of all households by 2050, households with heads 35-64 shrinking to 59%, and households with heads 15-34 years old staying mostly steady around 6-7%.

4. Household Type

Breaking households into categories provide insight into the diversity of households in a community. Similarly to Age of Householder, data from the 2020 U.S. Decennial Census has not been released as of the drafting of this document, so the latest American Community Survey estimate was used. Although household types have remained remarkably stable over the past 20 years, the largest change has been the increase in households without children under 18 years as families have aged without younger families moving into Dunstable. The number of households composed of a single person living alone has increased during this time, driven largely by householders 65 and older living alone. That said, this accounts for only an estimated 6% of total households.

Table 4: Households by Type, Dunstable (2000, 2010, and 2017-21)

Household Type	2000		2010		2017-2021	
	Number	%	Number	%	Number	%
Households with Children Under 18	458	50%	465	44%	425	37%
Households with Two or More Adults, No Children	370	40%	462	43%	591	52%
Householder Under 65 Living Alone	61	7%	92	9%	49	4%
Householder 65 and Older Living Alone	34	4%	44	4%	71	6%
Total Households	923	100%	1,063	100%	1,136	100%

Source: U.S. Census Bureau, 2000 and 2010 Decennial Census and 2017-2021 American Community Survey 5-Year Estimates, Table B11012.

The MassDOT projections predict that under a “business as usual” scenario, households with children will continue steadily shrinking to 32% of total households by 2050. Meanwhile, households living alone will increase from roughly 10% of total households to 17% in 2030, and 23% in 2040, before dipping back to 20% in 2050. Households with two or more adults but no children are projected to remain between 43% and 48%.

5. People with Disabilities

Understanding the needs of people with disabilities living in Dunstable is a crucial aspect of housing planning because people with disabilities often have unique housing needs in terms of the physical design and/or accessibility of their homes, access to services, and housing costs relative to a fixed or limited income. The U.S. Census Bureau formed an interagency group to develop a set of questions introduced in 2008. These questions categorize a disability as a difficulty in one of the following: hearing, vision, cognition, ambulatory (difficulty walking or climbing stairs), self-care (difficulty bathing or dressing), and independent living (difficulty doing errands alone, such as visiting a doctor’s office or shopping). **Table 5** provides information about the community with disabilities in Dunstable as of 2016-20.

An estimated 171 residents, approximately 5.1% of the total estimated population, were reported to have a disability. This is lower than the Greater Lowell average, which is 11.4% of all residents. Cognitive difficulty was the most prevalent disability (90 or 2.7% of total residents). It is important to note that some residents experience more than one disability, which is reflected in the table.

Table 5: Characteristics of the Community with Disabilities, Dunstable (2017-2021)

Age Group and Disability Status	Total Number	Percent of Total Residents
Under 5 years old	0	0.0%
5-17 years old	4	0.1%
18-64 years old	100	3.0%
65+ years old	67	2.0%
Total Number of Residents with a Disability	171	5.1%
With a hearing difficulty (all ages)	53	1.6%
With a vision difficulty (all ages)	9	0.3%
With a cognitive difficulty (all ages)	90	2.7%
With an ambulatory difficulty (all ages)	31	0.9%
With a self-care difficulty (all ages)	19	0.6%
With an independent living difficulty (all ages)	72	2.1%

Source: U.S. Census Bureau, 2017-2021 American Community Survey 5-Year Estimates, Table S1810. Residents may report more than one disability.

6. Race and Ethnicity

Table 6 breaks down the town’s population by race and ethnicity. According to the 2020 U.S. Decennial Census, the population identifying as white increased by 6.2% (172 people) over the last 20 years, growing then declining from a peak in the 2010 Decennial Census. Because other groups have increased, the population identifying as white alone now composes 87.3% of the total population. That said, Dunstable has the second-highest “white alone” share in the region, after Pepperell.

Table 6: Race and Ethnicity Distribution, Greater Lowell Communities (2020)

	White Alone	Black or African American Alone	Asian Alone	Some Other Race Alone	Two or More Races	Hispanic or Latino (All races)
Billerica	80.2%	4.0%	8.6%	2.4%	4.9%	4.2%
Chelmsford	79.1%	2.5%	11.2%	1.8%	5.5%	4.1%
Dracut	78.2%	5.8%	6.1%	3.8%	6.1%	7.5%
Dunstable	87.3%	0.9%	4.9%	1.2%	5.8%	3.1%
Lowell	45.5%	9.0%	22.3%	12.6%	10.7%	21.7%
Pepperell	89.3%	1.3%	2.0%	1.6%	5.9%	3.2%
Tewksbury	87.0%	2.4%	4.2%	1.6%	4.8%	4.0%
Tyngsborough	81.8%	2.8%	8.0%	2.1%	5.3%	4.5%
Westford	71.7%	0.9%	21.4%	0.9%	5.0%	2.6%
Greater Lowell	67.4%	5.3%	14.0%	6.0%	7.3%	10.9%

Source: U.S. Census Bureau, 2020 Decennial Census

This may be partly related to high costs of housing. **Table 7** illustrates that, with the exception of Asian Alone, households with householders identifying as a race other than White Alone or as the Hispanic or Latino/Latina ethnicity tend to be more concentrated in income brackets below \$100,000 annually. These races and ethnicities are also more likely to be renters in our region. This may create fair housing implications for communities with high costs of housing. Fair housing is explored later in the Housing Production Plan.

Table 7: Income by Race, Greater Lowell (2017-2021)

	White Alone	Black or African American Alone	American Indian and Alaska Native Alone	Asian Alone	Native Hawaiian and Other Pacific Islander Alone	Some Other Race Alone	Two or More Races*	Hispanic or Latino
Less than \$50,000	26%	32%	64%	18%	54%	44%	31%	49%
\$50,000-\$99,999	26%	31%	11%	26%	0%	40%	24%	28%
\$100,000-\$149,999	20%	27%	9%	23%	0%	6%	19%	11%
\$150,000-\$199,999	13%	4%	0%	13%	46%	9%	15%	8%
\$200,000 or more	15%	6%	17%	20%	0%	2%	11%	5%
TOTAL	100%	100%	100%	100%	100%	100%	100%	100%

Source: U.S. Census Bureau, 2017-2021 American Community Survey 5-Year Estimates, Table B19001A-I.

FAST FACTS: INCOME ANALYSIS

7. Income Analysis

7.1. Median Household Income over Time

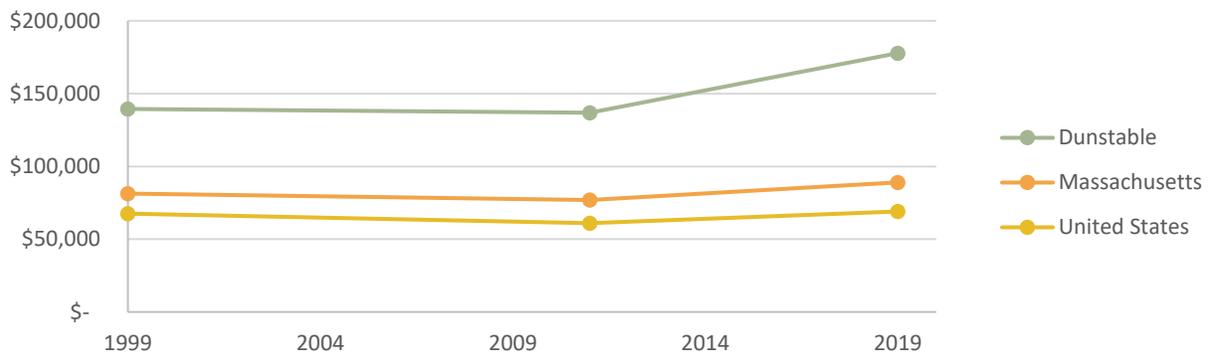
The U.S. Census Bureau calculates median household income based on the income of the householder and all other individuals 15 years old and over in the household. **Table 8** shows the change in inflation-adjusted median household income between 1999 and 2017-21 for Dunstable, Massachusetts, and the United States in 2021 dollars.¹³ Dunstable's inflation-adjusted median income increased by 27% from 1999 to the period covered by the most recent American Community Survey (2017-2021). The estimated median income is \$177,803, now the highest in the region.

- The region's 2023 AMI is \$132,400 and a family of 3 making \$80,500 would be eligible for a SHI unit (80% AMI)
- 210 Dunstable households, or 18%, were estimated to have incomes at or below 80% of the Area Median Family Income.
- Households headed by householders between 25-44 years of age had the highest median income, \$191,000.
- 61% of the population living under poverty (25 individuals), were 65 years or older.

Table 8: Median Household Income in 2021 Dollars, Selected Geographies (1999, 2009-2013, and 2017-2021)

Geographic Area	1999	2009-2013	2017-2021	% Inflation Adjusted Increase 1999-2017/21
Dunstable	\$139,479	\$136,875	\$177,803	27%
Massachusetts	\$81,308	\$76,896	\$89,026	9%
United States	\$67,530	\$61,003	\$69,021	2%

Figure 2: Median Household Income in 2021 Dollars, Selected Geographies (1999, 2009-2013 and 2017-2021)



Source: U.S. Census Bureau, 2000 Decennial Census and 2009-2013 and 2017-2021 American Community Survey 5-Year Estimates, Table B19013. Line chart graphs American Community Survey results in their middle year, i.e., 2017-21 American Community Survey is charted at 2019.

¹³ This Housing Production Plan uses the Bureau of Labor Statistics (BLS) Inflation Rate Calculator to estimate inflation, with one dollar in April 1999 having the same buying power as \$1.61 in April 2021 dollars (chosen because the amounts reported in the 2017-21 American Community Survey are inflated to this level). The inflation calculator uses the average Consumer Price Index (CPI) for a given calendar year, and the data represents changes in the prices of all goods and services purchased for consumption by urban households.

7.2. Income Distribution

While median household income is a valuable indicator, it does not account for the distribution of household incomes in a community. **Table 9** compares Dunstable to the Greater Lowell region and the Greater Lowell suburbs (excluding City of Lowell). The American Community Survey estimates that Dunstable has a small, but non-zero, number of households earning less than \$50,000 and more than a quarter that earn between \$50,000 and \$149,999. Potentially due to lack of affordable housing options, Dunstable has a much higher proportion of those earning \$150,000 or more than both the region’s suburbs and the region as a whole. These numbers are best estimates based on the American Community Survey.

Table 9: Household Income Distribution, Dunstable (2017-2021)

Income Category	Number of Dunstable Households	Percent of Dunstable Households	Percent of Households, Greater Lowell Region Outside of Lowell	Percent of Households, Greater Lowell
Less than \$15,000	25	2%	4%	7%
\$15,000-\$24,999	13	1%	4%	6%
\$25,000-\$34,999	20	2%	5%	5%
\$35,000-\$49,999	39	3%	6%	7%
\$50,000-\$74,999	85	8%	12%	14%
\$75,000-\$99,999	104	9%	12%	13%
\$100,000-\$124,999	85	8%	11%	11%
\$125,000-\$149,999	122	11%	12%	10%
\$150,000 or more	643	57%	36%	27%
Total	1,136	100.0%	100.0%	100.0%

Source: U.S. Census Bureau, 2017-2021 American Community Survey 5-Year Estimates, Table B19001 (All amounts in 2021 inflation-adjusted dollars). Amounts rounded to the nearest percent.

MassDOT projects that the number of households with income below \$35,000 annually will grow proportionately to 17% of households by 2040, and the number of households making from \$125,000 to \$225,000 will shrink to 27% by 2040, and 25% by 2050. All other categories are projected to not change more than a few percentage points. This will have an overall effect of there being a small but growing number at the lowest end of the income spectrum and a shrinking number at the top of the spectrum. All MassDOT projections are in 2020 dollars.

The Census Bureau also estimates median household income by age of head of householder, which is presented in **Table 10** on the next page. The age category with the highest median income, \$187,188, were households with heads of household that are aged 25-44 years. The number of households with householders under 25 years in Dunstable was too small to estimate a median income for that category. Younger households’ higher median incomes may be a result of rising housing prices. In the past, lower-income households may have been able to buy a home, “lock in” their mortgage, and age in place. However, now a young household must have a higher income to afford to buy a home in Dunstable.

Table 10: Median Household Income in the Past 12 Months by Age of Householder, Dunstable 2017-2021

Age of Householder	2017-2021 Median Income
Householder under 25 years	N/A
Householder 25 - 44 years	\$187,188
Householder 45 - 64 years	\$180,769
Householder 65 years and older	\$95,769
Median Household Income	\$177,803

Source: U.S. Census Bureau, 2017-2021 American Community Survey 5-Year Estimates, Table B19049 (All amounts in 2021 inflation-adjusted dollars)

7.3. Housing and Urban Development Area Median Family Income (HAMFI)

As discussed in the **Introduction**, the U.S. Department of Housing and Urban Development (HUD) bases a household’s eligibility for affordable units on a series of income thresholds. HUD defines these thresholds via a formula based on the HUD Area Median Family Income (HAMFI), which is the median family income calculated by HUD for each Fair Market Rent (FMR) Area. HUD includes Dunstable in the Lowell Metro Fair Market Rent Area, a ten-community region including the NMCOG region plus the Town of Groton. The Massachusetts Executive Office of Housing and Livable Communities (EOHLC) uses these measures as well. As shown in **Table 11**, the HUD Area Median Family Income for the Lowell Metro Fair Market Rent Area for FY 2022 was \$132,400.

HUD and EOHLC categorize households earning 80%-100% of HUD Area Median Family Income as “moderate income”, households earning 51%-80% as “low income”, 31-50% as “very low income,” and at or below 30% as “extremely low income¹⁴”. HUD uses a special formula to adjust these based on the number of individuals in the household, which is reflected in **Table 11**. HUD and EOHLC use these adjusted thresholds to determine eligibility for income-restricted units, including Chapter 40B, Section 8, and Low-Income Housing Tax Credit Units.

Table 11: Adjusted Income Limits by Household Size, Lowell Metro Fair Market Rent Area, FY 2023

HUD Area Median Family Income	FY 2022 Income Limit Category	Household Size (Number of People)							
		1	2	3	4	5	6	7	8
\$132,400	Extremely Low	\$46,350	\$53,000	\$59,600	\$66,200	\$71,500	\$76,800	\$82,100	\$87,400
	50% - Very Low	\$27,800	\$31,800	\$35,750	\$39,700	\$42,900	\$46,100	\$49,250	\$52,450
	80% - Low	\$66,300	\$75,750	\$85,200	\$94,650	\$102,250	\$109,800	\$117,400	\$124,950

Source: U.S. Department of Housing and Urban Development, May 2022. Dunstable is included in the Lowell Metropolitan Fair Market Rent (FMR) region.

The American Community Survey does not report income by household size at HUD Area Median Family Income thresholds, so this Plan uses Comprehensive Housing Affordability Strategy (CHAS) Data. The

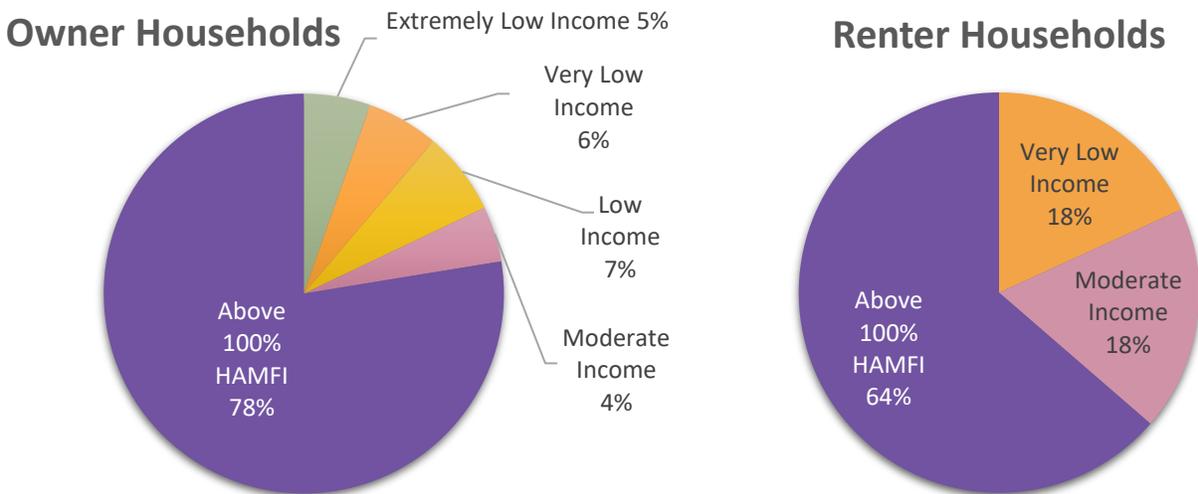
¹⁴ The FY 2014 Consolidated Appropriations Act changed the definition of extremely low-income to be the greater of 30/50ths (60 percent) of the Section 8 very low-income limit or the poverty guideline as established by the Department of Health and Human Services (HHS), provided that this amount is not greater than the 50% very low-income limit.

most recent CHAS data utilizes the 2015-19 American Community Survey. This data estimates that 60 households (5.1% of total households) had incomes at 30% HUD Area Median Family Income or less, 75 households (6.4%) had incomes at 31%-50% HUD Area Median Family Income, and 75 households (6.4%) had incomes at 50%-80% HUD Area Median Family Income. In total, 210 Dunstable households, or 17.9%, were estimated to have incomes at or below 80% of the HUD Area Median Family Income.

Table 12: Income Distribution by Tenure, Dunstable (2015-2019)

Income Category	Owner Households	Renter Households	Total
Household Income <= 30% HAMFI (Extremely Low Income)	60	0	60
Household Income >30% to <=50% HAMFI (Very Low Income)	65	10	75
Household Income >50% to <=80% HAMFI (Low Income)	75	0	75
Household Income >80% to <=100% HAMFI (Moderate Income)	50	10	60
Household Income >100% HAMFI	865	35	900
Total	1,115	60	1,175

Figure 3: Income Distribution by Tenure, Dunstable (2015-2019)



Source: U.S. Department of Housing and Urban Development, 2015-2019 Comprehensive Housing Affordability Strategy Data.

7.4. Poverty Indicators in Dunstable

Every year, the U.S. Census Bureau establishes a set of “Poverty Thresholds” to estimate the population’s poverty levels. They use a complex formula varying by family size and composition to determine who is living in poverty as part of the American Community Survey. The U.S. Department of Health and Human Resources (HHS) uses a simplified version of these census thresholds called the “Federal Poverty Guidelines” to determine eligibility for programs such as food assistance. For the purpose of the American Community Survey, if a family’s total income is less than the threshold, then that family and every individual in it is considered to be living under poverty. The official poverty thresholds do not vary geographically, but they are updated for inflation using the Consumer Price Index (CPI-U). The official poverty definition uses money income before taxes and does not include capital gains or noncash benefits (such as public housing, Medicaid, and food assistance).

Table 13: 2023 Poverty Guidelines for the 48 Contiguous States and the District of Columbia

Number of Persons in Family	Poverty Guideline
1	\$14,580
2	\$19,720
3	\$24,860
4	\$30,000
5	\$35,140
6	\$40,280
7	\$45,420
8	\$50,560
For each additional person	\$5,140

Source: Poverty guidelines updated periodically in the Federal Register by the U.S. Department of Health and Human Services under the authority of 42 U.S.C. 9902(2), <https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines>

Table 13 displays the 2022 poverty guidelines, but the American Community Survey data displayed in **Table 14** uses the more complex “Poverty Threshold” calculation. According to the 2017-21 American Community Survey estimates, 41 Dunstable residents (approximately 1.2% of total population) were classified as living under poverty. This is comparable to the 2009-13 ACS estimates. More than 60% of these were 65 to 74 years old. Even though the proportion of people in poverty over 65 is only an estimate and a small number as a proportion of overall population, it is still higher than the region or state.

Table 14: Characteristics of the Population Living under Poverty, Selected Geographies (2017-2021)

	Number Below Poverty Level, Dunstable	Percent of those in poverty, Dunstable	Percent of those in poverty, Greater Lowell	Percent of those in poverty, Massachusetts
17 Years and under	0	0%	26%	25%
18 to 24 Years	2	5%	14%	13%
25 to 34 Years	5	12%	13%	14%
35 to 44 Years	0	0%	10%	10%
45 to 54 Years	5	12%	12%	10%
55 to 64 Years	4	10%	13%	12%
65 to 74 Years	25	61%	7%	8%
75 Years and Over	0	0%	5%	8%
Total Individuals Living under Poverty	41	100.0%	100.0%	100.0%
Male	15	37%	47%	44%
Female	26	63%	53%	56%
Total Population of which Poverty Status is Known	3,363	3,363	301,893	6,756,217

Source: U.S. Census Bureau, 2017-2021 American Community Survey 5-Year Estimates, Table B17001

8. Data from School District

School departments and the Massachusetts Department of Elementary and Secondary Education provide information about the characteristics and needs of students. Dunstable is a member of the Groton-Dunstable Regional School District, which consists of a high school, two middle schools, and three elementary schools. The total enrollment for the Groton-Dunstable Regional School District was 2,315 for the 2021-2022 school year, 194 lower than the 2015-2016 school year (the year the previous Housing Production Plan was written). The percentage of Dunstable students within the School District was 22.7% (541). Groton students represented 76.7% of the total enrollment, while the remaining 0.6% was comprised of students from other communities. The School District is comprised of the following schools:

- a. **Groton-Dunstable High School** serves students in the ninth to twelfth grades and had a 97.8% graduation rate and 0.0% dropout rate in 2019-2020.¹⁵ The number of high school students has dropped from 786 students in 2017-2018 to 704 students in 2021-2022.
- b. **Groton Dunstable Regional Middle School** consists of two schools the North and South, and serves students in the fifth to eighth grades.
- c. The **elementary schools** in the Groton-Dunstable Regional School District consist of the Florence Roache Elementary School in Groton and the Swallow Union Elementary School in Dunstable, which serve students in grades kindergarten through fourth grade.
- d. The **Boutwell Early Childhood Center** in Groton serves the pre-school or Early Childhood & Care (ECC) students.

Table 15 outlines figures for all students in the Groton-Dunstable Regional School District.

Table 15: Total Public School Enrollment, Groton-Dunstable Regional School District (2017-2022)

School	2017-2018	2018-2019	2019-2020	2020-2021	2021-2022
ECC *	63	58	58	37	69
Elementary School (1-4)	803	846	815	798	827
Middle School (5-8)	765	733	755	706	715
High School (9-12)**	786	763	725	721	704
Total Enrollment	2,417	2,400	2,353	2,262	2,315

Source: Massachusetts Department of Elementary and Secondary Schools, 2022

* ECC: Early Childhood Care/Pre-K ** High School includes special education beyond grade 12.

Dunstable youth also attend the vocational school at the Greater Lowell Technical High School in Tyngsborough, as well as a number of private, parochial and charter schools. These schools are likely to include Lawrence Academy (Groton), Bishop Guertin (Nashua), Country Day School (Groton), the Academy of Notre Dame (Tyngsborough), Innovation Academy (Tyngsborough) and Parker Charter (Devens). Of the 2,262 enrolled in the Groton-Dunstable district in the 2020-2021 school year, 2.6% had a first language other than English, 1.2% were English Language Learners, 11.5% were considered low-income, and 15.8% were Students with Disabilities. These data are not broken down to note which of these students reside in Dunstable versus Groton but remain important in developing an understanding of the needs of student populations.

¹⁵ Data retrieved from Massachusetts Department of Elementary and Secondary Education 2021 District Report Card, <https://reportcards.doe.mass.edu/2021/DistrictReportcard/06730000>

B. Housing Inventory Analysis

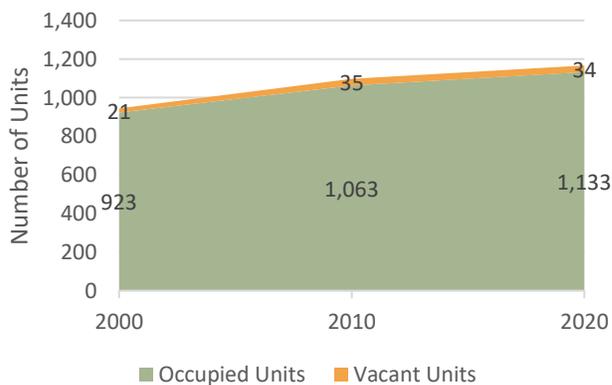
This Section examines the characteristics of the current housing inventory and local housing market in Dunstable. The Section begins with an analysis of housing types and home values, followed by an examination of development and sales trends, including the median cost of renting or buying a home in Dunstable. In the next Section, this data is compared with data from the previous Section to determine the gap between the existing and projected housing inventory and the existing and projected population.

1. Housing Units

Table 16 illustrates the total number of housing units (both occupied, which is always the same number as the census count of households, and unoccupied) as counted by the decennial census. The total number of units grew by 16% between 2000 and 2010, and 6% between 2010 and 2020. The number of vacant units at the 2020 census was mostly unchanged from the 2010 census.

Table 16: Total Housing Units, Dunstable (2000-2020)

	2000	2010	2020
Occupied Units	923	1,063	1,133
Vacant Units	21	35	34
Total Units	944	1,098	1,167



Source: U.S. Census Bureau, 2000 Decennial Census, SF1 Table H3, and 2010 and 2020 Decennial Census, Table H1

FAST FACTS: HOUSING INVENTORY ANALYSIS

- Dunstable had no SHI units as of November 2022.
- An estimated 98.3% of all housing units in Dunstable were single-family homes in 2022, with only 6% being renter occupied in 2020.
- Between 2012 and 2021, 74 new housing units were permitted, all single-family detached.
- Single family median home sales prices were over \$500,000 in 2022 dollars every year since at least 2013, and were \$719,000 in 2022.
- Homes valued at less than \$200,000 decreased significantly (more than 90%) between 2011-15 and 2017-21.
- In 2017-21, the estimated vacancy rate, or percentage of annual number of homes on the market, was 0% for both for-sale and for-rent units, compared to 0.6% and 3.2% respectively for Greater Lowell, meaning homes are rented or sold very soon after being put on the market. The small number of vacant units counted by the census are usually not on the market.

2. Housing Type

A diversity of housing types such as single family detached, single family attached (townhomes), two-family (duplexes), and multifamily or mixed-use housing allow households with different needs and incomes to settle and live in a community. Although American Community Survey estimates were not accurate enough to use to track change over time, this Plan uses the 2022 Assessor’s Data to estimate the current make-up of Dunstable’s housing types. The Assessor’s Data categorizes properties by their building type. Notably, Accessory Dwelling Units are not included in this data set and appear as Single Family Residential. Dunstable’s Accessory Dwelling Unit definition and program is explored later in this Housing Production Plan.

Table 17: Housing Properties and Units by Type, Dunstable (2022)

Category	Number of Properties	Number of Units (Estimated)
Single Family Residential	1,104	1,104
Two-Family Residential	10	20
Mixed-Use, including Agricultural, Commercial, Forest, or Recreation	45	47
Total	N/A	1,171

Source: MassGIS Assessor’s Map. Land Use Code was used for Category. Mixed-use properties were estimated based on visual inspection such as number of exterior doors or mailboxes.

The total number of units counted with this methodology is 1,171 units, slightly more than the official 2020 Decennial Census count. As a small number of units were permitted in 2020 and 2021 which would account for this discrepancy (see **Section B.4: Recent Residential Development**), there is a high level of confidence that these numbers are roughly accurate. Of these units, 20 (1.7% of total units) are two-family residential. Of the 45 mostly agricultural mixed-use properties, two appeared to each have two units, bringing the total count to 47 mixed-use units. There were 13 commercial mixed-use buildings—for example, the Farmhouse Café. This is a lower proportion of non-single family residential units than the other Lowell suburbs, which have an estimated weighted average of 28% of units categorized as something other than single family detached according to the 2017-2021 American Community Survey.

3. Housing Tenure

Just as a diversity of housing types to match the needs of diverse households is important, having a mix of housing available for rent and for sale is also important. Table 18 compares Dunstable’s 2020 Decennial Census count with the other Greater Lowell suburbs, Greater Lowell as a whole, and Massachusetts. Dunstable counted 6% units as renter-occupied, which was a lower percentage than the other geographies.

Table 18: Households by Tenure, Selected Geographies (2020)

	Dunstable		Region Outside Lowell		Greater Lowell		Massachusetts	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Owner Occupied	1,059	91%	57,730	78%	74,794	63%	1,660,042	55%
Renter Occupied	74	6%	13,805	19%	37,970	32%	1,089,183	36%
Vacant	34	3%	2,855	4%	5,108	4%	249,312	8%
Total Housing Units	1,167	100%	74,390	100%	117,872	100%	2,998,537	100%

Source: U.S. Census Bureau, 2020 Decennial Census, Tables H1 and H4.

4. Recent Residential Development

This Plan tracks the new units permitted in the last ten years to determine more recent trends. This includes the number of building permits issued by structure type, the total new units permitted, the total valuation, and the average valuation per unit for all residential permits issued between 2012 and 2021. Notably, although this Housing Production Plan makes its best effort to summarize building permit data provided by the Town of Dunstable, these should be considered a proxy or estimate for actual units constructed, as not all permitted units are constructed.

The number of units permitted in a year ranged from 3, in 2012 when the region was still recovering from the Great Recession, to a high of 23 in 2018. The largest development during this range was Chapman Street, a subdivision of 18 homes. Other projects tended to be infill projects of one single family home or small subdivisions of 3-7 homes. Overall, the previous five years (2017-2021) had an average of 9.4 homes per year permitted at an average construction value of \$307,383. 2020 and 2021 had the highest average construction values in the ten-year period at \$401,500 and \$421,500 respectively. This was a significant jump from the previous record average construction value, which was \$340,286 in 2019.

Table 19: New Residential Building Units Permitted, Dunstable (2012 - 2021)

Year	Units Permitted (Not all Permitted Units are Constructed)			Total Construction Value	Average Construction Value per Unit
	Single Family Detached	Other Unit Type	Total		
2012	3	0	3	\$895,000	\$298,333
2013	5	0	5	\$1,195,000	\$239,000
2014	7	0	7	\$2,115,000	\$302,143
2015	10	0	10	\$3,389,000	\$338,900
2016	2	0	2	\$420,000	\$210,000
2017	9	0	9	\$2,877,000	\$319,667
2018	23	0	23	\$5,896,000	\$256,348
2019	7	0	7	\$2,382,000	\$340,286
2020	4	0	4	\$1,606,000	\$401,500
2021	4	0	4	\$1,686,000	\$421,500
Total 2012-16	27	0	27	\$8,014,000	\$296,815
Total 2017-21	47	0	47	\$14,447,000	\$307,383

Source: Dunstable Building Department (2012-2021).

5. Projected Housing Development

Projecting future housing unit development is difficult as market conditions can quickly change. According to data from the U.S. Census Bureau, the average annual growth rate of total housing units between the 2010 and 2020 Decennial Census was 6.9 units annually. However, permit data can provide a more granular—and recent—picture. An average of 7.4 units were permitted annually in the last ten years (2012 to 2021). This rate of development has varied significantly—23 in 2018 followed by seven (7) in 2019, and then four (4) in both 2020 and 2021. However, subdivisions and comparatively larger developments being permitted roughly every three to five years interspersed with years where as few as two to four permits are issued results in an average close to the Census annual growth rate (7.4 units permitted annually versus 6.9 unit annual growth rate identified by the Census). Therefore, a single scenario assuming 7.15 units (the average of the 2010-2020 Census growth rate and annual permitting average) will be utilized to project housing development.

This calculation of an average of 7.15 units a year results in 36 units developed over the five-year life of this plan in a “business as usual” scenario.

This is lower rate than projected by MassDOT (which projects 194 households over 10 years), so it should be considered a low, conservative projection of anticipated housing construction. This is also a business-as-usual scenario, if interventions such as the development at 160-164 Pleasant Street (see Section **B.7.2 The Subsidized Housing Inventory Pipeline**) are not undertaken.

6. Housing Market Conditions

This Section moves from examining the number and types of units built to examining their cost. This will analyze trends in the local housing market in Dunstable over the last ten years, building upon the work that was completed in the *Dunstable Housing Production Plan for 2016-2020*. It examines the number of home sales, including the recorded sales for residential properties, and the median sales prices.

In summary, the major challenge facing Dunstable is the lack of housing choices for low- and moderate-income residents as sales prices spiked during the COVID-19 Pandemic and, as of 2022, had not receded. It is notable that although prices increased, sales did not significantly slow during the beginning of the COVID-19 pandemic in 2020 and rebounded 2021. However, the housing market may have changed in 2023, and any recent changes would not be reflected in this Plan.

6.1. Home Sales

During the period from 2013 to 2022, data illustrated in **Table 20** from the Warren Group shows that the housing market in Dunstable has recovered from the Great Recession. In 2013, single family home sales in Dunstable were at 35 units, rising to 39 by 2015. The sales then held relatively steady in the upper 30s to low 40s through 2022, with the exception of a slowdown in 2020 (33 units), which may have been related to the COVID-19 Pandemic.

Table 20: Property Sales, Dunstable and Greater Lowell (2013-2022)

Year	Dunstable		Greater Lowell		
	Single Family	Other Properties*	Single Family	Condo	Other Properties
2013	35	6	2,197	944	674
2014	33	13	2,170	997	714
2015	39	18	2,321	1,146	734
2016	41	12	2,717	1,341	838
2017	38	24	2,600	1,198	792
2018	38	21	2,590	1,253	829
2019	43	18	2,615	1,153	798
2020	33	15	2,501	1,088	750
2021	41	10	2,607	1,280	879
2022	38	41	2,217	1,030	737

Source: The Warren Group, 2023. *Most “Other properties” are vacant land or commercial properties. “Other properties” in Dunstable include properties categorized as condo sales by Warren Group, but records indicated they were for vacant land.

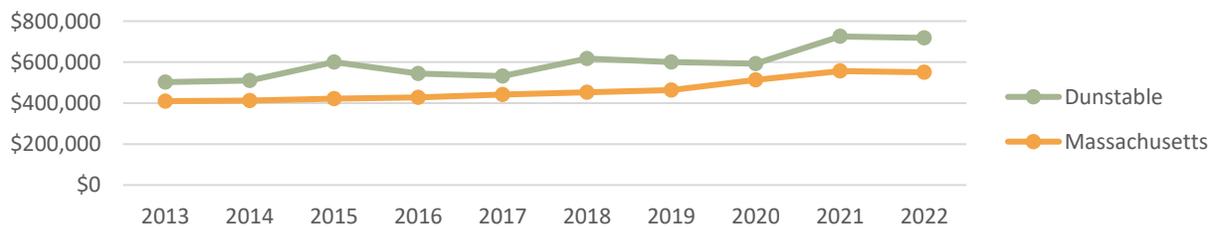
6.2. Sales Prices

Figure 4 and Table 21 show the changes in the median sales price of single family homes and all properties in Dunstable and Massachusetts between 2013 and 2022. All prices have been adjusted to 2022 dollars in order to more clearly illustrate the change of housing price above inflation. Dunstable’s median single family sales price, when adjusted for inflation, has risen more sharply than Massachusetts’s and now has a median single family sales price of \$719,000. This is second-highest in the region, behind Westford’s \$757,500 median single family sales price. Other 2022 median single family sales prices range from \$445,000 in Lowell to \$635,000 in Chelmsford.

Table 21: Median Sales Price by Property Type, Dunstable and Massachusetts (2013-2022)

Year	Dunstable			Massachusetts		
	Single Family	Condo	All Properties	Single Family	Condo	All Properties
2013	\$502,397	N/A	\$482,220	\$409,633	\$378,162	\$399,735
2014	\$509,712	N/A	\$478,632	\$412,432	\$385,392	\$404,040
2015	\$599,741	N/A	\$558,765	\$422,178	\$393,619	\$415,970
2016	\$544,624	N/A	\$528,642	\$427,831	\$405,087	\$424,020
2017	\$532,208	N/A	\$589,063	\$441,541	\$412,508	\$435,492
2018	\$617,348	N/A	\$658,504	\$452,722	\$429,086	\$446,842
2019	\$600,379	N/A	\$657,641	\$462,720	\$439,584	\$458,093
2020	\$591,941	N/A	\$576,137	\$513,782	\$477,001	\$499,989
2021	\$725,249	N/A	\$687,078	\$556,206	\$496,223	\$537,666
2022	\$719,000	N/A	\$719,000	\$550,000	\$488,830	\$530,000

Figure 4: Median Single Family Home Sales Price, Dunstable and Massachusetts (2013-2022)



Source: The Warren Group, 2023. All values in 2022 dollars per methodology in Section A.7.a.

American Community Survey data is not as recent as Warren Group data, and it represents all homes, not just homes recently sold. However, American Community Survey home value estimates can show the town’s full distribution of home values instead of a simple median. These American Community Survey estimates, shown in **Table 22** are based on responses from a sample of survey respondents. Note that this is an estimate, unlike to 2020 Decennial Census counts.

Table 22: Home Value, Homeowner Occupied Units, Dunstable (2011-2015 and 2017-2021)

	2011-2015		2017-2021		Change 2011-15 – 2017-21
	Number	Percent	Number	Percent	
Less than \$50,000	33	3%	0	0%	-100%
\$50,000 to \$99,999	5	0%	3	0%	-40%
\$100,000 to \$124,999	0	0%	0	0%	N/A
\$125,000 to \$149,999	0	0%	0	0%	N/A
\$150,000 to \$174,999	0	0%	0	0%	N/A
\$175,000 to \$199,999	5	0%	0	0%	-100%
\$200,000 to \$249,999	29	3%	18	2%	-38%
\$250,000 to \$299,999	72	6%	25	2%	-65%
\$300,000 to \$399,999	280	25%	173	16%	-38%
\$400,000 to \$499,999	423	37%	242	23%	-43%
\$500,000 to \$749,999	244	21%	457	43%	+87%
\$750,000 to \$999,999	33	3%	119	11%	+261%
\$1,000,000 to \$1,499,999	0	0%	12	1%	N/A
\$1,500,000 to \$1,999,999	13	1%	19	2%	+46%
Total	1,137	100%	1,068	100%	+6%

Source: U.S. Census Bureau, 2011-2015 and 2017-2021 American Community Survey Five-Year Estimates, Table B2507

6.3. Foreclosures

Based upon data provided by the Warren Group, the foreclosure petitions in Dunstable from 2012 to 2022 are summarized in **Table 23**. As time passed from the Great Recession, the number of foreclosure petitions decreased. In 2020 and 2021 there have been no foreclosures, which may reflect the foreclosure moratoriums related to COVID-19.¹⁶ In 2022, there was one foreclosure. Compared to the other communities in the Greater Lowell region, the number of foreclosure petitions has been relatively low.

Table 23: Petitions to Foreclosure, Dunstable (2012-2022)

Year	Number of Single Family Foreclosure Petitions	Total Number of Foreclosure Petitions
2012	6	6
2013	1	1
2014	2	2
2015	2	2
2016	3	4
2017	1	1
2018	0	1
2019	4	4
2020	0	0
2021	0	0
2022	1	1

Source: The Warren Group, 2022.

¹⁶ Most mortgages had certain protections from foreclosure from March, 2020 to September, 2021, with other assistance and rules starting in 2021, see <https://www.mass.gov/info-details/massachusetts-law-about-foreclosure>

6.4. Fair Market Rent

The U.S. Department of Housing and Urban Development (HUD) uses **Fair Market Rent (FMR)** estimates primarily to determine standard payment amounts for the Housing Choice Voucher program, initial renewal rents for some expiring project-based Section 8 contracts, initial rents for housing assistance payment (HAP), contracts in the Moderate Rehabilitation Single Room Occupancy program (Mod Rehab), and to serve as a rent ceiling in the HOME rental assistance program.¹⁷ Fair Market Rent is HUD’s estimate of the 40th percentile of gross rents for typical, non-standard rental units occupied by recent movers in a local housing market.¹⁸ As mentioned earlier, HUD defines Dunstable’s “local housing market” as the Lowell Metro Fair Market Rent Area. As shown in **Table 24**, the Fair Market Rent for a 1-bedroom apartment in the Lowell, MA HUD Metro Fair Market Rent Area in FY 2022 was \$1,359 per month, and all Fair Market Rents were roughly between \$1,200 and \$2,400. This is a fairly large increase from FY 2021’s Fair Market Rent, which were roughly between \$1,000 and \$2,000.

Table 24: Fair Market Rent for Lowell, MA HUD Metro Fair Market Rent Area (FY 2022)

	Efficiency	1-Bedroom	2-Bedroom	3-Bedroom	4-Bedroom
FY 2022 FMR	\$1,237	\$1,359	\$1,773	\$2,192	\$2,404

Source: FY 2022 Lowell, MA Metro FMR Area, Housing and Urban Development Fair Market Rent Documentation System, 2022. https://www.huduser.gov/portal/datasets/fmr/fmrs/FY2022_code/2022summary.odn Retrieved April 1, 2022

6.5. Median Gross Rent

Unlike Fair Market Rent data, the American Community Survey provides rent cost data specific to each community. **Table 25** shows the median rent for Dunstable in comparison to the rest of Greater Lowell, adjusted to 2022 dollars. This median rent includes apartments of all sizes (i.e., efficiency, 1-bedroom, 2-bedroom, etc.), making it difficult to compare directly to Fair Market Rent. Dunstable’s median gross rent is the fourth-highest in the region, increasing an inflation-adjusted 14% in the last six years.

Table 25: Median Gross Rent, Greater Lowell Communities (2011-2015 and 2017-2021)

Community	Median Gross Rent 2011-15	Median Gross Rent 2017-21	Change	% Change
Billerica	\$1,622	\$1,913	\$291	18%
Chelmsford	\$1,382	\$1,871	\$489	35%
Dracut	\$1,466	\$1,600	\$133	9%
Dunstable	\$1,552	\$1,772	\$220	14%
Lowell	\$1,248	\$1,430	\$182	15%
Pepperell	\$1,432	\$1,180	-\$252	-18%
Tewksbury	\$1,860	\$2,323	\$463	25%
Tyngsborough	\$1,301	\$1,741	\$439	34%
Westford	\$1,755	\$2,327	\$573	33%

Source: U.S. Census Bureau, 2011-2015 and 2017-2021 American Community Survey Five-Year Estimates, Table . All values in 2022 dollars.

¹⁷ HOME is the largest Federal block grant to state and local governments designed exclusively to create affordable housing for low-income households. States and localities use HOME to fund a range of activities that build, buy, and/or rehabilitate affordable housing for rent or ownership or provide direct assistance to low-income people.

¹⁸ Source: U.S. Department of Housing and Urban Development Office of Policy Development and Research, U.S. Housing Market Conditions Summary, Fair Market Rents.

<https://www.huduser.gov/periodicals/ushmc/winter98/summary-2.html> Retrieved June 30, 2022.

6.6. Housing Vacancy Rates

Although the U.S. Census provides quarterly data on vacancies through the Housing Vacancy Survey, the smallest geographical unit available is the Metropolitan Statistical Area. Fortunately, the American Community Survey also provides information on vacancies, both rental-occupied and owner-occupied.

Table 26 compares Dunstable to its peer suburbs of Lowell, Greater Lowell, and Massachusetts in 2017-2021. Dunstable's vacancy rate was less than the other geographies, but even Massachusetts as a whole, at 0.7% units for sale, is well below what would be considered a healthy market, which might be considered a 2% vacancy rate in which buyers have a good selection of homes.¹⁹ For reference, the average ownership vacancy rate across the entire United States was 1.1% in 2017-21.

Table 26: Ownership Units by Vacancy Status, Selected Geographies, (2017-21)

	Owner Occupied		For sale		Sold, not occupied		For seasonal, recreational, or occasional use		Other vacant		Total Owner Units
	Number	%	Number	%	Number	%	Number	%	Number	%	
Dunstable	1,068	98.9%	0	0.0%	0	0.0%	0	0.0%	12	1.1%	1,080
Region Outside Lowell	58,306	97.5%	267	0.4%	268	0.4%	290	0.5%	671	1.1%	59,802
Greater Lowell	75,767	96.8%	463	0.6%	336	0.4%	401	0.5%	1,284	1.6%	78,251
Mass.	1,694,407	88.5%	14,197	0.7%	14,604	0.8%	121,692	6.4%	69,157	3.6%	1,914,057

Source: U.S. Census Bureau, 2017-2021 American Community Survey Five-Year Estimates, Table B25004 and Table B25032.

The rental vacancy rate for Dunstable is even smaller. A vacancy rate of 7% to 8% might be considered a healthy rental market,²⁰ but Dunstable's estimated vacancy rate has been at zero for many years. **Table 27** compares Dunstable to its peer Lowell suburbs in the Greater Lowell region, Greater Lowell as a whole, and Massachusetts. As with for-sale units, all geographies are well below what might be considered a healthy rental market, but Dunstable had the lowest vacancy. The region outside Lowell had 383 units for rent, or a 3.0% vacancy rate. Greater Lowell as a whole had 1,166 units or 3.2% vacancy rate. Massachusetts had 35,335 units available for rent or 3.3% vacancy rate. For reference, the United States rental vacancy rate was 5.7% in 2017-21.

Table 27: Rental Units by Vacancy Status, Selected Geographies (2017-21)

Year	Occupied Units		For Rent Units		Rented, Not Occupied		Total Rental Units
	Number	Percent	Number	Percent	Number	Percent	
Dunstable	68	100.0%	0	0.0%	0	0.0%	68
Region Outside Lowell	12,536	96.8%	383	3.0%	37	0.3%	12,956
Greater Lowell	35,335	96.5%	1,166	3.2%	110	0.3%	36,611
Massachusetts	1,020,041	95.7%	35,123	3.3%	10,413	1.0%	1,065,577

Source: U.S. Census Bureau, 2017-2021 American Community Survey Five-Year Estimates, Table B25004 and Table B25032.

¹⁹ Alan Mallach, *The Empty House Next Door*, 2018

²⁰ Ibid.

7. Affordable Housing Development

The final element of this Plan’s description of Dunstable’s housing inventory is a description and projection of its affordable and Subsidized Housing Inventory (SHI)-eligible housing development. The Executive Office of Housing and Livable Communities (EOHLC) regularly reports on the housing developments in a community that count toward its 10% affordability goal through the issuance of a Subsidized Housing Inventory (SHI) report. Based upon the 2010 U.S. Census, Dunstable had 1,085 year-round housing units and therefore, its 10% subsidized housing goal is 109 units. According to the EOHLC, Dunstable had no Subsidized Housing Inventory (SHI) units as of May 2022 (See **Table 28**).

Units are added and subtracted from the Subsidized Housing Inventory (SHI) throughout the cycle of their initial approval and occupancy. A unit is added to the Subsidized Housing Inventory (SHI) once it has received a Comprehensive Permit or other zoning approval. The Town must then document that a building permit has been issued within one year of the Comprehensive Permit and a certificate of occupancy has been granted within a year and a half from the issuance of a building permit to remain on the inventory.

7.1. Subsidized Housing Inventory Changes – Dunstable and Greater Lowell region

NMCOG analyzed the previous ten years from June 2011 to August 2023. During that time, no Subsidized Housing Inventory (SHI) units were recorded in Dunstable. **Table 28** compares Dunstable to the rest of the region. The 2010 Decennial Census counted 108,869 year-round housing units in Greater Lowell. In January 2014, there were 9,705 Subsidized Housing Inventory (SHI) units in Greater Lowell, representing 8.9% of the total year-round units. At the most recent report (August 2023) that number had grown to 11,602, a 19.5% increase. This represents 9.9% of the 117,212 2020 year-round units. With the updated 2020 numbers, four (4) towns have surpassed their 10% threshold: Billerica, Lowell, Tyngsborough, and Westford.

Table 28: Subsidized Housing Inventories, Greater Lowell Communities (January 2014-May 2022)

Community	Year- Round Housing Units 2010	Year- Round Housing Units 2020	Total Subsidized Housing Inventory (SHI) Units			Percent SHI Units	
			January 2014	August 2023	Percent Change	January 2014	August 2023
Billerica	14,442	15,460	857	1,668	94.6%	5.9%	10.8%
Chelmsford	13,741	14,696	1,064	1,438	34.2%	7.7%	9.8%
Dracut	11,318	12,304	719	606	-15.7%	6.4%	4.9%
Dunstable	1,085	1,145	0	0	0.0%	0.0%	0.0%
Lowell	41,308	43,370	5,215	5,127	-1.7%	12.6%	11.8%
Pepperell	4,335	4,588	129	130	0.8%	3.0%	2.8%
Tewksbury	10,803	12,098	1,030	1,088	5.6%	9.5%	9.0%
Tyngsborough	4,166	4,622	340	476	40.0%	8.2%	10.3%
Westford	7,671	8,929	351	1,069	204.6%	4.6%	12.0%
Greater Lowell region	108,869	117,212	9,705	11,602	19.5%	8.9%	9.9%

Source: Massachusetts Executive Office of Housing and Livable Communities. Percent SHI units is percent of 2010 year-round units for January 2014 and percent of 2020 year-round units for August 2022.

7.2. The Subsidized Housing Inventory Pipeline

As discussed earlier, the Town of Dunstable currently has zero Subsidized Housing Inventory (SHI) units. However, as of August 2023, there are two developments that are planned to include Subsidized Housing Inventory (SHI)-eligible units in the “pipeline” pending submittal and/or approval as local action units. These would create 45 Subsidized Housing Inventory (SHI) units if constructed as planned. These are summarized in **Table 29** and described below:

- The subdivision at **0 River Street** is an 11-unit project of which 1 will be affordable plus payments to the Town’s Affordable Housing Trust Fund for the remaining 5 houses.
- An August 17, 2022 Request for Proposals (RFP) for property at **160-164 Pleasant Street** would create “+/- 40 rental housing units (not to exceed 60 units) that are affordable to a mix of income levels and include options for a variety of household types, including families, seniors, and people with disabilities.” The RFP continues “The Town anticipates that at least 25 percent of units will be affordable at 80 percent of Area Median Income, but would encourage a greater mix of incomes, including some affordable to middle-income households and more deeply affordable units, in addition to market rate units.” The selected respondent proposed 44 units.

Table 29: Pipeline of Subsidized Housing Inventory Projects as of October 2022

Address	Type	Affordability Expires	Built with a Comprehensive Permit?	Total SHI Units
0 River Street	Ownership	Unknown	Unknown	1
160-164 Pleasant St	Rental	Unknown	Unknown	44
Total				45

Source: Town of Dunstable, July 18, 2022 Planning Board Minutes and August 17, 2022 Request for Proposals.

7.3. Previous Projected Total Housing Unit Development and Subsidized Housing Inventory (SHI) Goal compared to Actual Development

It is important for plans to look back and assess the accuracy and success of previous plans. This subsection assesses the accuracy of previous Housing Production Plans’ projections of housing development and whether Dunstable met the goal of Subsidized Housing Inventory (SHI) units it set in those plans.

Previous Projection and Goal

The first *Town of Dunstable Planned Production Plan for Affordable Housing* was submitted to Department of Housing and Community Development (DHCD, now the Executive Office of Housing and Livable Communities, EOHLIC) in February 2005 and approved shortly thereafter. According to the Subsidized Housing Inventory (SHI) reports at that time, Dunstable had 933 housing units and no subsidized housing units. The Town needed 93 subsidized housing units to meet its 10% goal. The document outlined a planned production schedule of 137 subsidized housing units over a ten-year period. This would include 30 units through the Pleasant Street Apartments, 40 units through the Mixed-Use District Housing, 35 units on Town-owned property, 14 units through bylaw changes and 18 units through existing unit conversions for a total of 137 subsidized housing units.

As of the *Dunstable Housing Production Plan for 2016-2020*, which was submitted to DHCD (now EOHLC) and approved on March 2, 2016, the zoning changes contemplated in the 2005 plan weren't completed and the private sector was not able to produce the number of affordable units envisioned in the Plan. There were no "pipeline" projects at that time, and so the 2016 plan recommended a focus on developing subsidized housing units on the potential affordable housing sites outlined in that plan.

The *Dunstable Housing Production Plan for 2016-2020* outlined several housing development schedules in order to reach its 10% goal. Each assumed the average growth rate of total households from 2000-2010, 16.3% annually, would continue, adding an average of 18 units of total housing per year.

1. Assuming that roughly 22% of all new units constructed were Subsidized Housing Inventory (SHI)-eligible, Dunstable would have reached 16 affordable units out of 1,264 total units by 2020 and would have reached the 10% threshold in 27 years. (However, the threshold would be revised with new census figures every ten years, likely increasing.)
2. Assuming a 0.5% production of subsidized units per year, Dunstable would have reached 20 affordable units out of 1,264 by 2020 and would have reached the 10% threshold in 22 years.
3. Assuming a 1.0% production of subsidized units per year, Dunstable would have reached 44 affordable units out of 1,264 by 2020 and would have reached the 10% threshold in ten years.

Actual Housing Production

The 2020 U.S. Decennial Census reported 1,167 total units. The average growth rate of total housing (occupied and unoccupied) units between the 2010 and 2020 Decennial Census was 0.73% additional units (compounding) per year. However, as noted earlier, Dunstable did not add any Subsidized Housing Inventory (SHI) units during the performance period of the *Dunstable Housing Production Plan for 2016-2020*. This means that Dunstable produced 53 fewer market-rate units and 44 fewer Subsidized Housing Inventory (SHI)-eligible units than projected by 2020.

C. Housing Cost Burden Analysis

The previous subsections examined existing and projected populations and the existing housing inventory. In other words, they looked at current and projected demand and supply. This subsection examines the interaction between supply and demand, including the gap between housing costs that are considered affordable and the actual cost of housing in Dunstable.

Public officials generally agree that housing that costs 30% or less of a household's total annual income can be considered affordable. Households that spend between 30% and 50% of their annual incomes on housing and related costs (including basic utilities and fuels) are said to be “**moderately burdened**” while those spending more than half of their incomes are considered “**severely burdened**”. This Section analyzes the housing costs for homeowners and renters in Dunstable and provides an analysis of their overall housing burden.

1. Housing Cost Burden by Tenure

Typically, renter-occupied households pay a greater proportion of their income on housing than owner-occupied households. This may be because renters typically have lower incomes, but it also may be because rent increases with the market while a mortgage is usually “locked in” even as a household's income increases through the course of the income earners' careers.

Contrary to this trend, the share of burdened renters in Dunstable became lower than the share of burdened owners in 2016-20. However, 2017-2021 estimates that a greater proportion of renters were cost-burdened. **Table 30** shows this comparison. In 2017-2021, renter households that were considered moderately burdened accounted for approximately 29% of renter households (20 households), while no renters were considered severely burdened. This was a decline from 2011-15, when those numbers were

FAST FACTS: HOUSING COST BURDEN ANALYSIS

- An estimated 241 Dunstable households (20.7%) were moderately or severely cost-burdened during the 2017-2021 period. This represents a reduction in the number of households that were cost burdened in 2011-15 (328 or 27.9%).
- That said, an estimated 65 owners (6.1% of owners) were severely cost-burdened in 2017-21, paying more than half their income on housing costs.
- An estimated 45% of nonfamily households with at least one member over age 62 were cost burdened in 2015-19.
- The median single-family home is unaffordable for at least 41%, and likely a higher proportion, of the owner households living in town.
- The current median gross rent in Dunstable is unaffordable for an estimated 57% of the renter occupied households living in town, and a household would have to work 116 forty-hour weeks annually at minimum wage to not be cost-burdened at the median rent.

64% (18 households) and 18% (5 households) respectively. It should be noted that the margins of error for these numbers are high because of the small number of estimated renter households (28 in 2011-15 and 97 in 2017-21). This could explain some of the significant change in renter cost burden during the time period, but due to its importance in the analysis, this data has been retained.

The situation also improved for owner-occupied households in Dunstable in the five years preceding 2021. In 2017-21, owner households that were considered moderately burdened accounted for 15% of owner households (156 households) and those considered severely burdened accounted for 6% of owner households (65 households). This was a decrease from 2011-15. There may be a number of reasons for this improvement. For example, income levels of homeowners may have risen faster than home prices. However, people with lower incomes may have been priced out of the owner market entirely, leaving proportionately more people with higher incomes and therefore less cost burden. Regardless of this improvement, nearly 250 renter or owner households were still estimated to be housing cost burdened.

Table 30: Housing Costs as a Percentage of Household Income, Dunstable (2011-2015 and 2017-2021)

Housing Cost Burden	Renters				Owners			
	2011-15		2017-21		2011-15		2017-21	
	Households	Percent	Households	Percent	Households	Percent	Households	Percent
Not Burdened	5	18%	39	57%	843	73%	842	79%
30%-50%	18	64%	20	29%	203	18%	156	15%
50% or more	5	18%	0	0%	102	9%	65	6%
Unknown	0	0%	9	13%	0	0%	5	0%
Total	28	100%	97	100%	1,148	100%	1,068	100%

Source: U.S. Census Bureau, 2011-2015 and 2017-2021 American Community Survey Five-Year Estimates, Table B25106.

2. Housing Cost Burden by Household Income

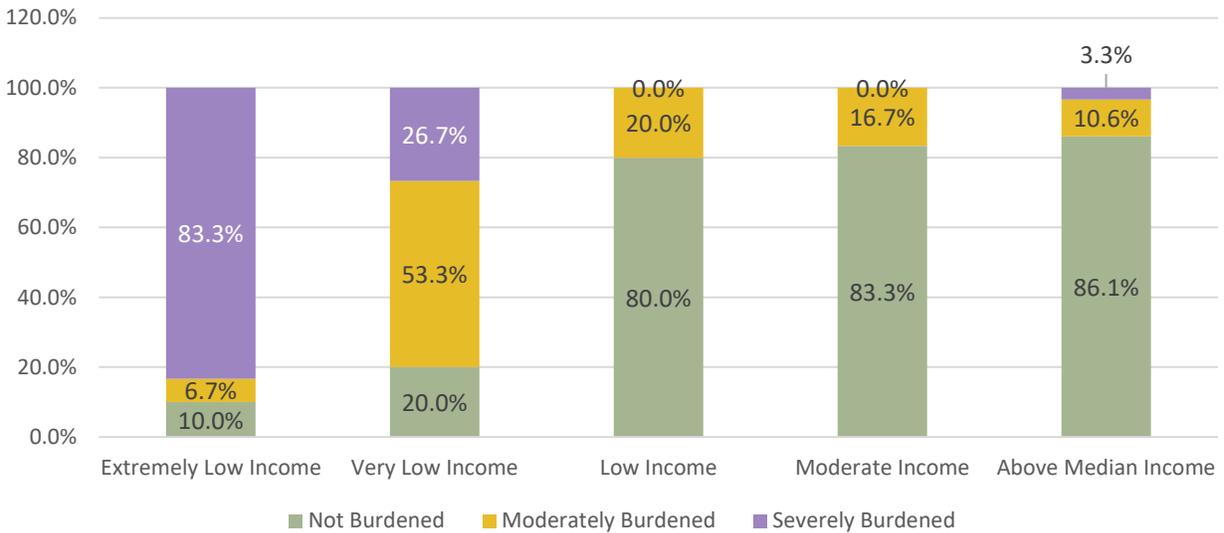
Lower income households also typically face higher housing cost burdens than higher income households. Although the American Community Survey tracks this data, it does not break it down into income limit categories based on Area Median Income as most housing programs do. However, the Comprehensive Housing Affordability Strategy (CHAS) data created from the 2015-2019 American Community Survey does tabulate housing cost burden by percent of the region's Area Median Income. Refer to Table 11 for the definition of income limit categories.

Table 31: Cost-burdened Households by Categories of HUD Area Median Family Income, Dunstable (2015-19)

Income Category	Not Burdened		Moderately Burdened		Severely Burdened		Total
	Households	Percent	Households	Percent	Households	Percent	
Extremely Low Income	6	10.0%	4	6.7%	50	83.3%	60
Very Low Income	15	20.0%	40	53.3%	20	26.7%	75
Low Income	60	80.0%	15	20.0%	0	0.0%	75
Moderate Income	50	83.3%	10	16.7%	0	0.0%	60
Above Median Income	775	86.1%	95	10.6%	30	3.3%	900
Total	916	77.6%	165	14.0%	99	8.4%	1,180

Source: U.S. Department of Housing and Urban Development, 2015-2019 CHAS Data, Table 1.

Figure 5: Dunstable Cost-burdened Households by Categories of HUD Area Median Family Income, 2015-19



Source: U.S Department of Housing and Urban Development, 2015-2019 CHAS Data, Table 1.

According to the Comprehensive Housing Affordability Strategy data, lower income households were more often cost burdened than those near or above Area Median Income. In 2015-19, the U.S. Department of Housing and Urban Development (HUD) estimated that 83% of Extremely Low Income (earning equal to or less than 30% Area Median Income) households in Dunstable, or 50 households, were severely burdened, paying more than 50% of their income on housing costs. In addition, 27% of Very Low Income (earning more than 30% but not more than 50% of Area Median Income), or 20 households were severely burdened. No households earning between 50% and 100% of the median income were severely burdened, but 3% of households earning the median income or above, or 30 households, were estimated to be severely burdened.

Moderate burden, or paying between 30% and 50% of household income on housing expenses, was fairly common in all categories, at 7% (4 households), 53% (40 households), 20% (15 households), and 17% (10 households) of all extremely low income, very low income, low income, and moderate income households respectively. Nearly 11% of households earning above the median income were also moderately burdened.

3. Housing Burden by Household Type

To better understand the types of households and families that most often are moderately or severely burdened, the Comprehensive Housing Affordability Strategy data also tabulates burden into five household types:

- **Elderly families**, a 2-person family with at least one member age 62 or over
- **Small families**, a family with 2 persons, neither person 62 years or over, or 3 or 4 persons
- **Large families**, a family with 5 or more persons
- **Elderly non-family**, a nonfamily household with at least one member age 62 or over, including one-person households
- **Other non-family**, a nonfamily household with no members age 62 or over, including one-person households

This data is represented in **Table 32**. Elderly non-families, often including elders living alone, have the highest number of moderately or severely burdened households, at 81 or 50% of elderly non-family households. The most often severely burdened household type is other non-family households, at 23 households or 34% being severely burdened. That said, all household types have significant numbers of burdened households.

Table 32: Cost-burdened Households by Household Type, Dunstable (2015-19)

Household Type	Not Burdened		Moderately Burdened		Severely Burdened		Total*
	Households	Percent	Households	Percent	Households	Percent	
Elderly Family	158	84%	18	10%	4	2%	187
Small Family	524	88%	58	10%	18	3%	597
Large Family	98	74%	30	23%	4	3%	132
Elderly Non-Family	70	44%	42	26%	39	24%	160
Other Non-Family	43	64%	4	6%	23	34%	67
Total	893	78%	152	13%	88	8%	1,143

Numbers do not add up to total and percentages do not add up to 100% because they are based on estimates.

Source: U.S Department of Housing and Urban Development, 2015-2019 CHAS Data, Table 7.

4. Affordability Gap for Ownership Units

The Warren Group reported that the 2022 median selling price for single family homes in Dunstable was \$719,000. Assuming a 30-year fixed mortgage at a 7% interest rate, 10% down, 1.2% property tax, \$1,300/year home insurance, and \$1,600/year private mortgage insurance, monthly payments would be approximately \$4,786. A household would need to earn approximately \$191,440 per year for a single family mortgage to be affordable.²¹ As of 2017-21, an estimated 41% of total owner households (443 households), made less than \$150,000 per year.²² In other words...

The median single family home is unaffordable for at least 41%, and likely a higher proportion, of the owner households living in town.

This number is likely higher because an unknown number make between \$150,000 and \$191,440 and because the calculation doesn't include utility costs or other housing costs.

As the distribution of housing costs and incomes may reveal needs the medians of cost and income do not, NMCOG created a simple analysis that compares the 2017-2021 American Community Survey estimates of values of owner-occupied residential units with the 2017-2021 estimates of income distribution of owner households. Each group of households in an income category was assigned the range of housing that would roughly be considered "affordable" for it using the methodology above. For example, 30% of the income that households earning \$35,000 to \$49,999 receive would be able to pay for a house between \$113,417 and \$162,025 with the above assumptions. This roughly corresponds to the home price category of \$100,000 to \$149,999. A similar calculation was made for each category. Although this methodology doesn't provide exact numbers, it does suggest areas of housing mismatch.

There were an estimated 46 homeowner-occupied homes valued at less than \$300,000 in Dunstable in 2017-21, but the number of households that could not afford a home valued more than \$300,000 without being housing cost burdened were estimated to be 247 households. This meant there was a deficit of 201 homes in this price range. There was a surplus of homes only in the highest range. Notably, this analysis does not consider vacant units on the market or the actual cost of the units that were sold during that time, only the estimates of home value the American Community Survey provided.

Table 33: Estimated Gap between Owner-Occupied Housing Supply and Demand

Home Value	Estimated Demand	Estimated Supply	Mismatch
Less than \$50,000	28	0	-28
\$50,000 to \$99,999	18	4	-14
\$100,000 to \$149,999	24	0	-24
\$150,000 to \$199,999	46	0	-46
\$200,000 to \$299,999	74	67	-7
\$300,000 to \$399,999	153	185	32
\$400,000 to \$499,999	193	298	105
More than \$500,000	567	549	-18
Total	1,103	1,103	0

Source: U.S. Census Bureau, 2017-21 American Community Survey, NMCOG Analysis

²¹ Source: Bankrate Mortgage Calculator, <https://www.bankrate.com/mortgages/mortgage-calculator/>

²² Source: U.S. Census Bureau, 2016-20 American Community Survey, Five-Year estimates, Table S2503. Data does not break down incomes by tenure above \$150,000.

5. Affordability Gap for Rental Units

In 2017-21, the median rental unit in Dunstable would have been considered “affordable” to households making at least \$70,880 per year. While this income level is lower than Dunstable’s overall median income in 2017-21 (\$177,803), an estimated 57% of all renter households (39 households), made less than \$75,000 per year.²³ In other words...

The current median gross rent in Dunstable is unaffordable for nearly 57% of the renter occupied households living in town.

Although these affordability thresholds are low, it’s important to remember they do not incorporate the cost of housing-related expenses, such as heat and utilities, into total housing costs. It should also be noted that the sample size is very low because Dunstable has a much smaller amount of rental stock than other communities in the region.

Another way of considering this is comparing the median rental cost to minimum wage. In order for a household to make \$70,880 annually to make the median rental affordable for that household, **members of that household would have to work more than 116 forty-hour weeks annually at the 2023 minimum wage.**

²³ Source: U.S. Census Bureau, 2016-20 American Community Survey, Five-Year estimates, Table S2503

D. Housing Issues

The amount, type, and cost of housing only partially describe Dunstable’s housing inventory. The other way of describing the inventory is to qualitatively evaluate housing conditions. This includes the physical condition of Dunstable’s housing and whether that housing is accessible to seniors or people with disabilities. Other housing issues include meeting requirements to “affirmatively further fair housing” to eliminate housing discrimination and residential segregation. Finally, evaluating housing conditions includes determining whether current housing serves existing and projected needs, such as providing access to jobs and/or services and providing adequate room and conditions for family activities such as working at home or studying.

FAST FACTS: HOUSING ISSUES

- Hispanics or Latino/as are applying for a mortgage for a new house at a lower rate than other communities, which may point toward Fair Housing concerns.
- Tax rate was a major concern of survey respondents. This HPP analyzes complete housing costs, including taxes.

1. Fair Housing

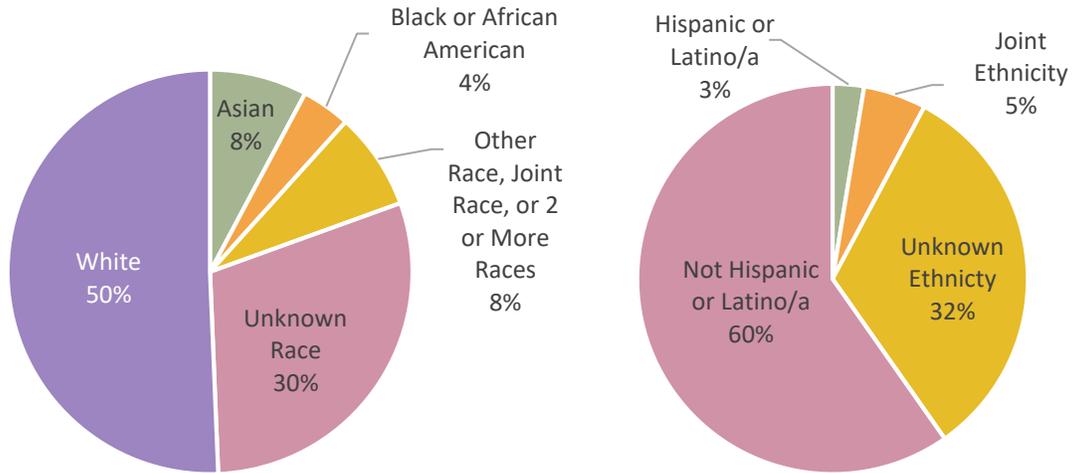
Protected classes should have access to housing and not experience inequitable housing costs, unsafe living conditions, and unequal access to opportunity. Fair housing laws address discrimination based on characteristics that are often (though not always) personal and immutable. These characteristics are called “protected classes” in fair housing law and include the following: race; color; national origin; religion; sex; familial status (families with children); disability; age (40 and older); marital status; genetic information; sexual orientation; gender identity; military service; arrest record; and public assistance. According to the Consumer Financial Protection Bureau, the “Home Mortgage Disclosure Act (HMDA) requires many financial institutions to maintain, report, and publicly disclose loan-level information about mortgages. These data help show whether lenders are serving the housing needs of their communities; they give public officials information that helps them make decisions and policies; and they shed light on lending patterns that could be discriminatory. The public data are modified to protect applicant and borrower privacy.”²⁴ The data were analyzed in order to determine whether there were racial or ethnic disparities in home lending in Dunstable.

As **Figure 6** illustrates, 3% of Home Purchase applications in Dunstable identified as Hispanic or Latino/a, and 5% were Joint Ethnicity. Depending on the identification of the 32% with Unknown Ethnicity, this may be less than the 10.9% of the population in Greater Lowell overall that was identified as Hispanic or Latino/a in the 2020 Decennial Census. Turning to race, 8% of mortgage applications for home purchase in Dunstable were from an applicant identifying as Asian; 4% were from an applicant identifying as Black or African American; 8% were from another race, joint race, or 2 or more races; and 50% were from an

²⁴ “Mortgage data (HMDA)”, Consumer Financial Protection Bureau, retrieved May 31, 2023, <https://www.consumerfinance.gov/data-research/hmda/>

applicant identifying as White. Because a large proportion of applicants were of an unknown race, it is unknown how this compares to the 2020 Decennial Census counts of Greater Lowell proportions, which counted 14% of Greater Lowell as Asian, 5% as Black, 13% as another race or two or more races, and 67% as White.

Figure 6: Mortgage Applications for Purchase of Home in Dunstable by Race and Ethnicity, Dunstable (2021)



Source: Home Mortgage Disclosure Act, 2021

Only two mortgage applications for new homes were denied in the study year, and the sample size was too small to evaluate any patterns. Of applicants whose race was known and was not White, there were 15 applications, 2 of which were withdrawn and 3 closed for incompleteness. There were only two applications from Hispanic or Latino/a applicants, both of which were approved.

Although the numbers described above relate to mortgages for new homes, not all mortgages are for new homes. As shown in **Table 34**, mortgages for home purchases ranged from 16%, White Non Hispanic or Latino/a to 60% of Black or African American, Any Ethnicity.

Table 34: Purpose of Loan, Mortgage Applicants, Dunstable (2021)

Race and Ethnicity	Sample Size	Home purchase	Home improvement	Other purpose	Refinancing	Cash-out refinancing
Asian, Any Ethnicity	16	38%	0%	0%	56%	6%
Black or African American, Any Ethnicity	5	60%	0%	40%	0%	0%
Other Race, Joint Race, or 2 or More Races, Any Ethnicity	14	43%	0%	14%	29%	14%
Unknown Race, Any Ethnicity	101	23%	6%	3%	47%	22%
Hispanic or Latino/a, Any Race	9	22%	0%	0%	67%	11%
Joint Ethnicity, Any Race	7	57%	0%	0%	29%	14%
Unknown Ethnicity, Any Race	105	24%	6%	4%	45%	22%
White, Non Hispanic or Latino/a	213	16%	12%	2%	45%	25%
Total	368	21%	9%	3%	45%	22%

Source: Home Mortgage Disclosure Act, 2021

2. Tax Rate

The tax rate or tax costs was the largest “write-in” housing issue noted during Housing Production Plan outreach. Taxes, in addition to mortgages or similar debts on the property; real estate taxes; fire, hazard, and flood insurance on the property; utilities; fuels; and where appropriate condo or mobile home fees; are included in the American Community Survey statistics that are used in this Housing Production Plan.²⁵ Therefore, Dunstable’s tax rate is “baked in” to our analysis of owner-occupied housing costs and cost burden.

Dunstable’s residential tax rate in 2023 was \$14.97 per \$1,000 assessed (1.497% of the assessed fair value), down from \$15.25 in 2022. This is slightly higher than the median of all communities in the state (\$13.6) and Middlesex County (\$13.1).²⁶ However, there are exemptions for multiple classes of people that meet statutory qualification guidelines including legally blind people; seniors (41C); seniors, surviving spouses, and minor children of a deceased parent (17D); and veterans.

Importantly, one of the largest drivers of a tax bill is not the tax rate, but the assessed value, which has seen considerable increases. Although an owner benefits from the increase in value of their property when they sell which may offset the increased tax costs, it may be hard to realize these gains in the short-term. A major goal of the Housing Production Plan is to moderate home ownership costs.

3. Other Housing Issues

Other issues identified by residents in outreach by more than 30 survey respondents include homes being too large and difficulty keeping up with maintenance. The median year built of Single Family Residential properties in Dunstable is 1986, with 368 older than 50 years old and 83 older than 100 years old.²⁷ Older homes may have more maintenance concerns than homes built within the last 30 years and may have been built for different family sizes and types.

Aging in place and senior housing was a high concern in the survey as well. 39% stated it was extremely important to age in place, and an additional 22% stated it was very important. Other topics that have been voiced in outreach during the Housing Production Plan process is farm preservation, character, sustainability, and zoning enforcement. A large number of survey respondents noted a concern about affordability in Dunstable: 17 respondents mentioned subsidized or affordable housing in their vision statements, more than other keywords.

²⁵ “Median Selected Monthly Owner Costs - Housing units with a mortgage and without a mortgage,” U.S. Census Bureau, retrieved May 31, 2023, <https://www.census.gov/quickfacts/fact/note/US/HSG651221>

²⁶ Data Analytics and Resources Bureau, Retrieved May 31, 2023, https://dls.gateway.dor.state.ma.us/reports/rdPage.aspx?rdReport=PropertyTaxInformation.taxratesbyclass.taxratesbyclass_main

²⁷ Assessors’ Database, Use=Single Family Residential, Mixed-Use, or Two Family Residential, Year Built=Prior to 1973 or 1923.

E. Affordable Housing Efforts

This Section of the Comprehensive Needs Assessment provides information on the resources the Town may call upon for housing development and the progress it has made since the *Dunstable Housing Production Plan for 2016-2020* (“2016 HPP”). This is provided to evaluate what agencies and resources may be utilized to advance goals defined in the next chapter and to provide a baseline for continued improvement. This Section starts with a summary of the progress made on steps in the *2018 Dunstable Master Plan* and the 2016 HPP since its completion.

1. Dunstable Master Plan

The *Dunstable Master Plan* was updated in 2018 after a two-year period of public involvement. This Master Plan referenced the *Dunstable Housing Production Plan for 2016-2020* in multiple locations. It outlined the following housing goals:

- Create housing opportunities that meet the needs of the community, as outlined in the Dunstable Housing Production Plan.
- Develop a design guidance document to ensure that future development projects are well-designed, consistent with local needs, respectful of the town’s character, and compatible with the goals outlined in the policies documents, including the Master Plan, Open Space and Recreation Plan, and the Housing Production Plan.
- Address the water infrastructure issue in order to facilitate the production of affordable and senior housing.
- Utilize CPA [Community Preservation Act] and state funds to support the production of affordable and workforce housing.
- Develop partnerships with non-profit and for profit developers to produce housing units to address the needs of seniors, young families and low- and moderate-income residents.

In addition, the goals related to land use are very relevant to Dunstable’s vision for housing:

- Maintain Dunstable’s rural character and landscape by preserving trees, stone walls, agricultural fields and pastures, and historic architecture.
- Strengthen and maintain the Town Center as the civic and cultural heart of the community.
- Examine the zoning options to allow for small business enterprises that are compatible with the character and needs of the community.

MAJOR ACCOMPLISHMENTS SINCE THE 2017 HPP

- May 8, 2017 Town Meeting approved Community Housing section addition to the Zoning Bylaw, moving it from the General Bylaw.
- May 15, 2021 Town Meeting approved Town Center Overlay District addition to the Zoning Bylaw.

Overall, the Master Plan laid out a vision for Dunstable that recognized that protecting Dunstable’s bucolic rural character and providing more housing options that meet the needs of current and future residents are not mutually exclusive. The Plan celebrated the hard work that created the Dunstable of today while dedicating the town to steps it must take for the future. To those ends, the plan directly or indirectly made several recommendations related to housing. Those recommendations and their current status are summarized in **Table 35**.

Table 35: 2018 Dunstable Master Plan Housing Recommendations

Chapter	Recommendation	Status
Land Use	Establish a Town Center Overlay District to accommodate small-scale retail, restaurants and cafes, a bank, artisan/artist shops galleries, museums and studio space, and personal services. The conversion of older, large homes to allow commercial space on the ground level with residential use above should also be explored.	Adopted at May 15, 2021 Annual Town Meeting.
Land Use and Housing	Evaluate the zoning classifications for eleven parcels identified in the Housing Production Plan as potential locations for future affordable housing to determine whether zoning changes are appropriate.	This was determined to be unnecessary.
Land Use, Housing, Open Space and Recreation, Cultural and Natural Resources	Revise the Open Space Development bylaw to include an affordability requirement, and ensure that affordable units are eligible for SHI inclusion and that they are deed restricted in perpetuity. In addition, clarify the density requirements for projects constructed under this section of the zoning bylaw. Consider lowering the project threshold from fourteen acres to five acres. Encourage the location of designated open space in an area that allows for connectivity to adjoining open space areas, if possible. Increase the amount of required open space from 35% to 50%. Institutionalize and strengthen the bylaw so that it is mandatory for subdivisions over a certain size.	Uncompleted.
Land Use and Housing	Revisit the Senior Residential Multifamily District bylaw to ensure adequate protection of set aside open space and to clarify density requirements. Ensure that affordable units created under this section of the zoning bylaw are subject to a deed restriction in perpetuity, and that units are SHI eligible.	Uncompleted.
Land Use	Identify locations where more moderate density housing development might be appropriate, in that it is reflective of the existing development characteristics of the surrounding neighborhood, and as a means of addressing non-conforming lots	Uncompleted.
Land Use	Re-examine the uses allowed within the B-3 district and consider adding multifamily housing as an allowed use by special permit.	This was considered but rejected by the Town.
Land Use and Housing	Establish design standards for Comprehensive Permit projects to ensure that such development projects maintain and protect the town’s rural character.	Uncompleted.
Economic Development	Streamline the local permitting process and develop a handbook that summarizes the permitting process.	Permitting Guide drafted by NMCOG in 2019.
Economic Development	Address the infrastructure issues related to the municipal water distribution system.	Progress is ongoing.
Economic Development	Address the infrastructure issues related to roads and sidewalks.	Progress is ongoing.

Table 35: 2018 Dunstable Master Plan Housing Recommendations

Chapter	Recommendation	Status
Economic Development	Identify and secure federal and state resources to build additional infrastructure and attract private investment.	Progress is ongoing.
Housing	Use the DHCD-approved Housing Production Plan as a management tool to develop new housing opportunities in meeting the Town’s annual housing production goals.	Progress is ongoing.
Housing	Implement the recommendations of the Dunstable Age Restricted Housing Supply and Demand Study.	Uncompleted.
Housing	Address the housing needs of the elderly, young families and low- and moderate-income families. Partner with non-profit and private developers to develop new housing units.	Progress is ongoing.
Housing	Revisit the Growth Management Bylaw to determine whether it should be continued or removed from the Town’s zoning regulations. Retaining the bylaw impacts the Town’s ability to leverage some state grant funds, such as Housing Choice capital funds.	This bylaw was repealed at the direction of the Attorney General.
Housing	Apply for designation as a Housing Choice Community if the Town meets the housing production eligibility criteria.	Uncompleted.
Housing	Apply for Housing Choice Capital and Technical Assistance Grants if designated as a Housing Choice Community.	Dunstable has not received this designation.
Housing	Modify the Zoning Bylaw to more clearly accommodate assisted living facilities.	Unknown progress.
Housing	Review the opportunities available under an Act to Promote Housing Choices to determine if the Town wants to take advantage of the simple majority voting provision for Town Meeting actions on certain zoning changes. (proposed legislation)	Not applicable.
Housing	Apply for MassWorks funding and research funding opportunities under USDA Rural Development to address water infrastructure issues.	Unknown progress.
Housing	Encourage the Affordable Housing Committee to issue its Request for Proposals (RFP) for the MUD District once the water infrastructure issue has been addressed.	Completed in 2022/23.
Housing	Focus on the potential development sites identified in the Dunstable HPP, as well as the Best Triangle and Pelletier properties, for housing development.	Progress is ongoing.
Housing	Utilize homebuyer and homeowner education programs to encourage home ownership.	Unknown progress.
Facilities and Services	Upgrade the Town’s water supply infrastructure to address issues outlined by MassDEP and comply with current standards, and to meet the overall drinking water and fire suppression needs of the community.	Progress is ongoing, with fire suppression needs now met.

2. Historic, Open Space, and Recreational Planning

Although Open Space and Historical plans don’t often directly address housing, reviewing previous planning in these areas can help guide plan formation. The 2006 Freedom’s Way Dunstable Reconnaissance Report by the Massachusetts Department of Recreation and Conservation and the Freedom’s Way Heritage Association was created by organizing a heritage landscape identification

meeting at which interested residents and Town officials offer community input by identifying heritage landscapes, then conducting fieldwork session with an expert consulting team. It noted the gateway from Route 3 to Dunstable Center is “remarkable” for its cultural landscape. It noted Dunstable’s continuing agricultural heritage. It recommended implementing Dunstable’s most recent Housing Production Plan so as to cluster affordable housing in targeted areas while preserving open space and the cultural landscape in others.

The more recent 2017 Open Space and Recreation Technical Paper, which included a written survey and visioning session, did not address housing directly. As part of the survey, over 60% of the respondents rated the number of recreational facilities and opportunities as excellent or good; approximately 87% of the respondents rated the amount of protected open space as excellent or good; 52% of respondents favored acquiring additional open space; and 69% of respondents favored protecting additional agricultural lands. Visioning session participants noted strengths of continuous open lands, a distinct rural nature, farms, and Salmon Brook among others. This reinforces the idea of identifying key locations for denser growth, potentially with design guidelines, while pursuing strategies to preserve large, contiguous tracts for agricultural and natural features.

3. Implementation of the 2016-2020 Affordable Housing Production Plan

The Town has made progress in achieving the Housing Goals and Strategies in the *Dunstable Housing Production Plan for 2016-2020*. Outlined in **Table 36** are the Housing Goals from the previous Plan and the status in achieving each goal.

Table 36: 2016 HPP Goals and Status in Achieving Goal

Goal	Status in Achieving Goal
Provide a variety of housing opportunities that serve all segments of the community, especially those below 80% of the area median income.	May 8, 2017 Town Meeting approved Community Housing section. This moved the section from the General Bylaw to the Zoning Bylaw. It had previously been in the General Bylaw since 2011.
Maintain the rural, residential and historic character of the town through housing development.	Unknown if goal is being met.
Create diverse rental units, in terms of types of units (duplexes vs. multifamily) and number of bedrooms (three or more), for Dunstable residents.	67 rental units were counted during the 2010 Decennial Census and 74 rental units were counted during the 2020 Decennial Census counts, with an unknown number created during the performance of the plan.
Support the creation of workforce housing units and broaden the range of potential home-buyers and tenants. (footnote: Workforce housing is a term commonly used to describe “housing for the occupations needed in every community, including teachers, nurses, police officers, fire fighters and many other critical workers.” This is typically defined as 80-120% AMI. Source: Center for Housing Policy, 2011 - http://www.housingpolicy.org/)	No workforce housing units were created in Dunstable during the performance of the plan.

Table 36: 2016 HPP Goals and Status in Achieving Goal

Goal	Status in Achieving Goal
Develop rental and ownership options for senior citizens, disabled residents and veterans that allow them to live independently.	Unknown progress.
Encourage new housing development consistent with community character and identified needs.	Unknown if goal is being met.
Update the zoning bylaw, development review processes and permitting policies so they are clear and consistent.	The zoning bylaw has not had a comprehensive update. It is unknown whether development review processes and permitting policies have been updated.
Coordinate the activities of the Affordable Housing Committee, Planning Board, Board of Selectmen and Zoning Board of Appeals to achieve consistency in the interpretation and administration of affordable housing requirements.	It is unknown if the activities of boards and committees are being coordinated.
Ensure that affordable housing development in Dunstable adheres to the Commonwealth’s Sustainable Development Principles.	Unknown if goal is being met.
Utilize the DHCD-approved Housing Production Plan as a management tool to develop new housing opportunities in meeting the Town’s annual housing production goals.	Progress is ongoing.

Source: *Dunstable Housing Production Plan for 2016-2020*

4. Dunstable Affordable Housing Committee

The Dunstable Affordable Housing Committee is comprised of six members and is responsible for overseeing the development of affordable housing in the community. The Committee meets as often as needed and advises the Board of Selectmen on housing initiatives that will improve the availability of affordable housing in Dunstable.

5. Affordable Housing Trust Fund

The Trustees administer an Affordable Housing Trust Fund (AHTF) to provide for the creation and preservation of affordable housing within the Town of Dunstable. Five Trustees are appointed by the Board of Selectmen with at least one such board member as a Trustee. The Trustees work primarily with both the Community Preservation Committee and the Affordable Housing Committee. At the October 15, 2019 Special Town Meeting, voters approved allocation of \$150,000 to the AHTF. However, as of October 2022, the fund had not been set up.

6. Community Preservation Committee

The Town of Dunstable adopted the Community Preservation Act (CPA) at a Special Town Meeting on September 25, 2006. This state legislation allows communities to impose a surcharge on annual property tax bills and use the funds to preserve open space and historic resources and create affordable housing. The nine-member committee was charged with considering projects and making recommendations for appropriations which preserve open space; provide affordable housing; preserve or restore historic property, documents, or artifacts; or which create recreational opportunities. Similar to many communities that have adopted the CPA, Dunstable’s Community Preservation Committee (CPC) allocates a minimum of 10% of the estimated revenue each year towards Affordable Housing

initiatives. Dunstable residents pay a 3% property tax surcharge to finance these community preservation projects. There is an exemption provided for low-income taxpayers, and any residential property entitled to an abatement or statutory exemption is automatically entitled to a proportional CPA exemption. As of October 2022, the CPA balance was \$1.9 million.

7. Habitat for Humanity of Greater Lowell

Habitat for Humanity of Greater Lowell (HFHGL) is a nonprofit 501 (c)(3) organization that “works to strengthen families and communities through affordable homeownership opportunities. Since its founding in 1991, HFHGL has built or renovated 40 homes in the Greater Lowell region, Bedford, Concord, and Reading. Homeowners pay for their homes through a monthly mortgage and 225-400 hours of “sweat equity”.

F. Development Constraints and Limitations

This Section examines land constraints and limitations that have an impact on the development of new housing opportunities in Dunstable. It includes a review of the land use development patterns, zoning provisions, and infrastructure analysis, and concludes with a summary of the Town’s plans to address and overcome these constraints.

1. Land Use Development Patterns and Potential

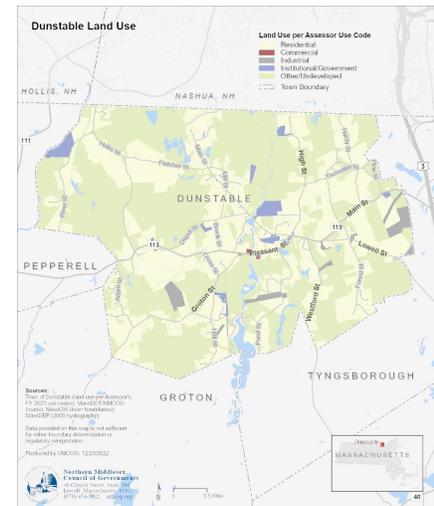
NMCOG analyzed the Town of Dunstable Assessor’s tax database by land use code in order to estimate the acreage of land that was occupied by commercial, industrial, institutional, and residential uses, including undeveloped land. As shown in **Table 37** and **Figure 7** (full size map in **Appendix 1 Maps**), 43% of land not occupied by water or rights of way is occupied by a residential use, which includes single family detached, two-family, and primarily residential mixed-use development.

Table 37: Dunstable Land Use by Acreage, 2022

Land Use Category	Acreage	Percentage of Total
Residential	4,437	43%
Agricultural	1,135	11%
Commercial (Incl. Commercial Recreation)	79	1%
Industrial (Incl. Warehouse)	79	1%
Institutional/Government	55	1%
Institutional/Government Open Space	2,907	28%
Other/Undeveloped	1,669	16%
Total	10,362	100%

Source: Town of Dunstable Assessor's Fiscal Year 2023 tax parcel database use codes and GIS parcel boundaries. Note that the acreage does not include Rights of Way and water acreage.

Figure 7: Land Use Map



The second-largest category of land at 29% was institutional/government. For the purpose of land use analysis, this was split into parcels occupied by buildings with uses such as schools, nonprofit agencies, and municipal uses (1% of total) and parcels with no buildings, which includes large open spaces such as cemeteries and conservation land. 11% of the land was used for agricultural purposes, and the remaining 2% was used for commercial or industrial purposes.

Notably, the “other” category was 16% of land not occupied by water or rights of way. The majority of this land is categorized as vacant. Using an estimate of constrained land from each parcel provided as part of MAPC Communities compliance model and based on MassGIS data layers²⁸, NMCOG estimated that roughly 541 acres in the other/undeveloped category were unconstrained.

²⁸ Constraints include Hydrography (waterbodies and waterways), Wetlands (per Mass DEP 2009 data), Title V and Surface Water Protection Zone A, Mass DEP Wellhead Protection Zone 1, and Restricted Open Space. As all calculations are based on parcel data, no right-of-way is included in the calculation.

Redevelopment is also a possibility for housing construction. For the purposes of this analysis, NMCOG estimated the acres that were occupied by a single home on large lots, which often are redeveloped when the home owner sells their property, and commercial recreation, which also are often redeveloped when the owner sells the property. NMCOG estimated that 1663 acres were parcels that were ten or more acres with only one single family detached structure, 379 of which is unconstrained. NMCOG estimated 71 acres were commercial recreation, none of which is unconstrained.

This is not meant to imply that all properties that meet these criteria are ideal for housing development and is also not meant to imply that redevelopment could not take place on other types of properties. Criteria for ideal housing development will be explored in **Chapter 4 Implementation Strategies**.

2. Zoning

This Section summarizes the local zoning regulations that are pertinent to the development of housing, and affordable housing in particular. It includes a discussion of the density and dimensional requirements for zoning districts where residential development is allowed and provides a summary of the special permit requirements, where appropriate.

2.1. Overview

The Zoning Bylaw was adopted in 1947 and heavily amended in 1986. As of its May 2021 amendment, the Zoning Bylaw has six (6) zoning districts and five (5) overlay districts. All of the zoning districts but one, Expanded Commercial (B-3), allow some types of housing as of right or by special permit from the Planning Board. The minimum lot area for residential development in all districts is 87,120 square feet. Three (3) of the zoning districts are intended as residential districts, and two (2) business districts allow some residential development as of right:

- Single Family Residence District (R-1),
- Commercial Recreational (R-1a),
- General Residence District (R-2),
- Retail Business (B-1), and
- Service Business (B-2)

All five of these districts allow single family detached by right. As mentioned above, Expanded Commercial (B-3) does not allow residential uses. Two-family housing is allowed as of right in R-2, B-1 and B-2 districts, but is not allowed in R-1 or R-1a. Multifamily dwellings for seniors (people age 55 or older) with three (3) or more units are allowed as of right in R-2, B-1 and B-2, and allowed by special permit from the Planning Board in R-1 and R-1a. Multifamily dwellings for people under the age of 55 is allowed only by special permit in two (2) of the overlay districts, MUD and TCD. Nursing or convalescent homes are allowed as of right in R-2, B-1 and B-2, while Accessory Dwelling Units are allowed by special permit from the ZBA in all districts except B-3.

In addition, two (2) overlay districts allow single family, two-family and multifamily dwellings either as of right or with a special permit:

- Mixed-Use Development (MUD)
- Town Center District (TCD)

The other three zoning districts are not related directly to housing, including the Tower Overlay District for telecommunication towers; the Floodplain District, which places restrictions in flood hazard areas; and the Solar Overlay District, to regulate large scale ground mounted solar energy systems.

Table 38 lists all housing types the zoning allows, and which zones allow them as of right or by special permit from the Planning Board.

Table 38: Housing Types by Zoning Districts

Housing Type	As of Right	Special Permit
Single Family Dwelling	R-1, R-1a, R-2, B-1, B-2, TCD	MUD*
Two- Family Dwellings	R-2, B-1, B-2	MUD, TCD
Multifamily Dwellings, Seniors Only	R-2, B-1, B-2	R-1, R-1a
Multifamily Dwellings, No Age Restriction		MUD, TCD
Accessory Dwelling Units		R-1, R-1a, R-2, B-1, B-2
Dwelling unit(s) above first floor		MUD, TCD
Boarding House	R-1, R-1a, R-2, B-1, B-2	
Nursing or convalescent home	R-2, B-1, B-2	
Trailer or mobile home park		

*Special Permit required for single family dwellings that are part of a Planned Unit Development.

Source: Town of Dunstable Zoning Bylaw, 2021

Although R-2, B-1 and B-2 allow two-family dwellings and senior multifamily dwellings as of right, these districts combined cover less than 2% of the town, or 194.3 acres. More than 96% of the town is zoned R-1, and an additional 1.9% is zoned R-1a, both of which:

- Allow only single family detached dwellings and boarding houses as residential dwelling by right;
- Allow multifamily dwellings for seniors only, and then only with a special permit;
- Allow Accessory Dwelling Units only with a special permit.

The primary effect of the zoning regulations appears to be to retain the town’s status mainly as a bedroom community with single family homes as the most common residential use.

2.2. District Descriptions

The five zoning districts allowing residential development are described below. Only R-1 and R-1a have a significant amount of vacant, potentially developable land. However, they may also have redevelopment opportunities.

Single Family Residence District (R-1): The R-1 District is intended primarily as a district of single family homes with not more than one dwelling unit together with reasonable and customary accessory buildings upon one lot. The R-1 District allows for one dwelling unit per lot, or a rooming or boarding

house for not more than three lodgers. In order to increase the availability of moderately priced housing for the young, elderly, people of low and moderate income, and dependent relatives of town residents, accessory dwelling units may be allowed by special permit of the Zoning Board of Appeals. The minimum lot size for residential subdivisions is 87,120 square feet. The R-1 District is 10,323 acres, or 96% of the town. In addition to 4,291 acres of residential parcels, institutional open space is very common in this district, at 2,823 acres. There was an estimated 1,592 acres of vacant or other parcels in the R-1 District, not counting residential, institutional, commercial, or industrial developments; protected open space; and agricultural parcels. 464 of these acres were estimated to be unconstrained by undevelopable or sensitive land.

Commercial Recreational (R-1a): Residential uses allowed within the Commercial Recreational District (R-1a) include any residential use permitted in the R-1 District. The minimum lot size for residential subdivisions is 87,120 square feet. The R-1a District is 204 acres, or 1.9% of the town. Only a small amount of land in this district was estimated to be vacant or other potentially developable land: roughly 13 acres.

General Residence District (R-2): The R-2 General Residence District allows single family, two-family and limited types of multifamily development. Two-family dwellings are allowed as long as there is only one residential structure per lot. Multifamily housing for the elderly under a state or federal law or program is allowed, or any other multifamily use mandated by law. The minimum lot size in the R-2 zone is 87,120 square feet, plus 20,000 square feet a second or third unit, plus 15,000 square feet for each additional unit. The minimum lot size for residential subdivisions is 87,120 square feet. The R-2 District is 18 acres, or 0.17% of the town. A majority of the land in the R-2 district currently (16 acres) is agricultural.

Retail Business District (B-1): While the B-1 District is intended to provide for retail and other consumer oriented businesses, any use permitted in an R-1 or R-2 district is also allowed in the B-1 district. The minimum lot size for residential subdivisions is 87,120 square feet. The B-1 District is 4 acres, or 0.04% of the town.

Service Business District (B-2): Like B-1, while the B-2 District is intended for commercial uses providing goods and services but allows for any use permitted in the R-1 or R-2 districts. The minimum lot size for residential subdivisions is 87,120 square feet. The B-2 District is 18 acres, or 0.17% of the town.

The two overlay districts that impact residential development specifically (the floodplain district impacts all development), include the following regulations on residential development:

Mixed-Use District: The Mixed-Use District bylaw was adopted to encourage the development of affordable housing, including rental and ownership units. The district allows for “Planned Unit Development for Mixed Uses”, which contain a mixture of residential uses and other uses, including multifamily dwellings, by special permit from the Planning Board. The bylaw allows two-family dwellings, townhouses, multifamily dwellings, and over-55 housing, providing the minimum area allocated for dwelling units is 5,000 square feet, and that the minimum land area for the development is ten acres. The MUD district is 38 acres, or 0.36% of the town. Most of the Mixed-Use District is occupied by the

Town-owned property at 160-164 Pleasant Street (see **Section B.7.2 The Subsidized Housing Inventory Pipeline**) with limited development opportunities outside that site.

Town Center District: The intent of the TCD is to allow owners of existing historical home sites and qualifying new buildings to incorporate additional uses within principal or accessory buildings while maintaining the historic integrity of the structures, the site, and the town center area. The bylaw allows the following uses by special permit from the Planning Board: conversion of existing one-family dwellings to two-family dwellings; conversion of existing buildings to allow up to two dwelling units on upper floors of commercial buildings; and authorization of multifamily dwellings existing at the time of adoption of the amendment. The TCD district is 81 acres, or 0.75% of the town. Assessor’s records show one vacant, developable parcel of 2.14 acres in the TCD district.

The permitted residential uses by zoning district are shown in **Table 39**.

Table 39: Allowed Residential Uses by Zoning District: 2021

Residential Use	Zoning District						Overlay District	
	Single Family (R-1)	Commercial Recreational (R-1a)	General Residence (R-2)	Retail Business (B-1)	Service Business (B-2)	Expanded Commercial District (B-3)	Mixed-Use Development (MUD)	Town Center District (TCD)
Single Family Dwelling	Y	Y	Y	Y	Y	N	PB*	Y
Two- Family Dwellings	N	N	Y	Y	Y	N	PB	PB
Multifamily Dwellings	PB (senior only)	PB (senior only)	Y (seniors only)	Y (senior only)	Y (senior only)	N	PB	PB
Accessory Dwelling Units	ZBA	ZBA	ZBA	ZBA	ZBA	N	ZBA	ZBA
Dwelling unit(s) above first floor	N	N	N	N	N	N	PB	PB
Boarding House	Y	Y	Y	Y	Y	N	UZ	UZ
Nursing or convalescent home	N	N	Y	Y	Y	N	UZ	UZ
Trailer or mobile home park	N	N	N	N	N	N	N	N

Y: Allowed as of right; **PB:** Allowed through Special Permit from the Planning Board; **ZBA:** Allowed by Special Permit from the Zoning Board of Appeals; **UZ:** See underlying zoning district; **N:** Not allowed.

*Special Permit required for single family dwellings that are part of a Planned Unit Development.

Source: *Town of Dunstable Zoning Bylaw, 2021.*

2.3. Planned Unit Development

In 2004, Dunstable Town Meeting approved the Mixed-Use District bylaw to encourage the development of affordable housing, including rental and ownership units. The district allows for “Planned Unit Development for Mixed Uses”, including single and multifamily dwellings by Special Permit from the Planning Board. The bylaw allows two-family dwellings, townhouses, multifamily dwellings, and over-55 housing, providing the minimum area allocated for dwelling units is 5,000 square feet, and that the minimum land area for the development is ten acres.

2.4. Senior Residential Multifamily Development (SRMD)

Senior Residential Multifamily Developments for people who are 55 years of age or older are allowed by special permit from the Planning Board in the R-1 and R-1a districts, and as of right in the R-2, B-1, and B-2 districts. The total number of dwelling units in an SRMD shall be no greater than the number of building lots that would otherwise be allowed on the tract, multiplied by $1\frac{1}{4}$, and rounded to the next higher integer, subject to a bonus provision. An SRMD project may consist of any combination of single family or multifamily residential structures. A multifamily structure must not contain more than five units. As part of the site plan approval, a minimum of five (5%) percent of the total number of dwelling units shall be restricted for a period not less than thirty (30) years.

2.5. Open Space Development

Dunstable’s Open Space Development regulation allows an owner of a tract of land situated in the R-1 district to seek a Special Permit exempting land from the lot area and frontage, yard and width requirements of the bylaw. The tract of land must be at least 14 acres in area, and the total number of building lots must be no more than the number of lots that would be allowed under a conventional development plan. At least 35% of the land must be retained as open space conveyed to the Town, a non-profit, or a homeowners association for conservation purposes. The bylaw requires that all dwelling units be in detached buildings, with no more than one dwelling unit per building.

2.6. Accessory Dwelling Units

The Accessory Dwelling Unit (ADU) Section of the Zoning Bylaw was added in 2015, limiting ADUs to only related individuals. In May 2021, the Town amended the Zoning Bylaw provision allowing the Zoning Board of Appeals to grant a special permit for accessory dwelling units for non-related individuals. Size was also changed at that time.

No more than one accessory dwelling per lot is allowed and an accessory dwelling unit cannot exceed 35% of the gross living area of the existing or expanded principal structure or 1,200 square feet, whichever is greater, and the accessory unit may not have more than two bedrooms. The accessory dwelling unit may be located in the principal structure or in a detached accessory structure; provided, however, that an accessory dwelling unit may be located in such detached accessory structure only where such detached accessory structure has been in existence for at least ten (10) years. The owner must certify that one of the two dwelling units is owner occupied, and that the lot and both dwellings are owned by the owner. The lot area must be 87,120 square feet or ten times the total ground floor area of the structure or structures on the lot, and comply with the dimensional requirements of the R-1 district. An unknown number of Accessory Dwelling Units have been permitted since May 2021, and it is recommended that Dunstable begin recording and tracking ADU permits.

2.7. Community Housing Bylaw

The purpose of Section 29 of the Zoning Bylaw, Community Housing, is to “promote the public health, safety and welfare by encouraging the creation of housing that more people can afford, especially people who live and work in the Town of Dunstable, in order to meet the Town’s goal of providing diversity and to mitigate the impacts of market-rate residential development on housing costs.”

The Bylaw requires that one of the first six units in a project with residential units shall be Community Housing. In a project with more than six total units, one of each of the next six units shall be Community Housing, with payments applying to any fractional number of units. Community Housing units are required to meet all LIP requirements.

Prior to the issuance of a certificate of occupancy for each market rate dwelling unit, the developer shall be required to make a payment to the Town's Affordable Housing Trust Fund. This payment will be based on the remaining number of units after the total number of units in the subdivision is divided by six (6) times 3% of the average price of the market rate units. This is mathematically expressed as:

- $(\text{Number of Units mod } 6) \times (3\% \text{ of average price of market rate units})$
- The 3% rate is based on the fact that the affordable unit must sell for 20% less than the market rate units. Spreading this 20% reduction in total gross revenue across six (6) units would be 3.33% per unit.

2.8. Conclusion

Overall, zoning is a constraint on housing production insofar as two-family and multifamily developments are largely limited and two acre minimum lot sizes are required for single family houses. The Single Family Residence (R-1) district (96.29% of the town) and the Commercial Recreational (R-1a) district (1.90% of the town) do not allow two-family housing, except in the Town Center District overlay district (0.75% of the town) and the Mixed-Use District overlay district (0.36% of the town).

Similarly, all multifamily development in Dunstable is restricted to seniors only, except in the MUD and TCD districts. This presents a significant barrier to production of affordable housing, particularly because together the MUD and TCD districts account for only 1.11% of the town’s acreage.

The Community Housing requirement of the Zoning Bylaw, adopted in May 15, 2021, is a significant step toward building new affordable housing in Dunstable. Dunstable has few projects large enough (six units or more) to trigger the requirement, and therefore no subsidized housing has been completed under the bylaw to date. However, one project in process at the time of this writing has one subsidized unit being developed as well as payments to be made to the Affordable Housing Trust Fund under the bylaw.

While the Accessory Dwelling Unit (ADU) provision of the Zoning Bylaw is a positive step toward developing additional housing, the requirement that detached accessory dwelling units must be located in detached structures that have been in existence for at least ten (10) years is a significant hurdle that may severely limit development of ADUs in Dunstable.

3. Infrastructure and Service Limitations

This Section provides information on the sewer, water, and transportation infrastructure and identifies the limitations that present barriers to new residential development. This summary is based upon information within the Annual Town Report, the Water Department web site, the *2018 Dunstable Master Plan*, and the *Northern Middlesex Regional Transportation Plan for 2020-2045*.

3.1. Sewer Capacity

There is no public sewage system in Dunstable. All wastewater treatment is done through onsite septic systems. This limits housing production based on expense and the limitations inherent in 310 CMR 15.000 (Title 5 of the State Environmental Code).

3.2. Water Supply and Protection

Dunstable has a limited centralized public water supply with 102 connections, with the majority being residential customers. According to information provided in the 2018 Master Plan, the Dunstable Water Department provides water to approximately 10% of the population. The remaining residents receive their water through on-site wells. In 2014, the Dunstable Water Division supplied an average of 26,455 gallons per day through 102 service connections serving approximately 234 persons per day. Water is supplied by two gravel packed wells located about 200 feet from the Salmon Brook. The main wellhead is the Salmon Brook Gravel Packed Well, while the backup well was brought online in December 2006. Both wells have the capacity to provide 360,000 gallons per day, though extensions of the existing supply lines along with additional connections would be required to service new dwellings outside of the current service area.

3.3. Transportation Network

Dunstable is served by a regional transportation network comprised of several modes, including automobile, bicycle, and pedestrian. However, due to the lack of bus or commuter rail stops within Dunstable, commuters are largely reliant on automobiles. As there is no commuter rail station in Dunstable, most residents use the station in Lowell at Gallagher Terminal. There are 41.2 centerline miles (127.95 lane miles) of roadway, including the numbered state road Route 113. The majority of the roads in Dunstable are local, urban, and rural roads.²⁹

The Town of Dunstable lies within the Lowell Regional Transit Authority's (LRTA) service area. In addition to Dunstable, the LRTA service area includes Acton, Billerica, Dracut, Carlisle, Chelmsford, Groton, Lowell, Maynard, Pepperell, Tewksbury, Townsend, Tyngsborough and Westford. There are no LRTA bus stops in Dunstable, however, some residents may use the Boston Express service at the Tyngsborough Park & Ride lot to South Station in Boston.

To measure congestion on key routes, NMCOG studies speed over a period of time. It then creates a "speed index", which is a ratio of average speed during peak hour compared with the free flow speed. A

²⁹ MassDOT "Road Inventory Year-End Report 2012".

value of less than 0.70 is considered “congested” and value between 0.70 and 0.90 are “somewhat congested.”

Pleasant Street/Main Street (Massachusetts Route 113) is the only Rural Arterial in the Town of Dunstable, connecting it to US-3 in Tyngsborough to the East and MA-111 and MA-119 in Pepperell to the West. There are smaller connections north to Nashua and south to Groton. MA-113 is considered “somewhat congested” eastbound during both A.M. and P.M. peak hours. It is also “somewhat congested” at a small section leading to High Street in the P.M. peak hour. This congestion does not suggest the transportation system has no capacity for additional units. Rather, it points toward a need to encourage new and existing housing units to use alternative transportation such as carpooling or transit whenever possible in addition to considering encouraging growth in areas that have the most capacity or areas where capacity can be expanded.

G. Comprehensive Needs Assessment Conclusions

As the previous subsections illustrate, there is a gap between the current and anticipated housing needs of the local population and the existing and projected housing stock. This subsection brings the rest of the Comprehensive Needs Assessment together, summarizing the issues that the Affordable Housing Goals must address.

Dunstable had no Subsidized Housing Inventory (SHI) units as of August 2023.

Despite the existence of the Community Housing requirement, Dunstable has had no Subsidized Housing Inventory (SHI) units developed as of August 2023. However, at the time of this writing there is one project in process being developed, which includes one subsidized unit; additionally, payments have been made to the Affordable Housing Trust Fund under the bylaw. There have also been positive responses to the Request for Proposals for a multifamily development which will include SHI units in the Mixed-Use District.

There are a significant number of residents at very low incomes and extremely low incomes, and their housing needs aren't being met.

Over the 2015-2019 period, 210 Dunstable households, or 18% of all households, were estimated to have incomes at or below 80% of the Area Median Family Income (see Table 12). These include an estimated 60 Extremely Low Income households (30% or less Area Median Income), 75 Very Low Income households (making between 30% and 50% Area Median Income), and 75 Low Income households (making between 30% and 50% Area Median Income). For reference, the Greater Lowell Fair Market Rent Area Median Family Income was \$132,400 in 2023, and Dunstable's median household income was \$177,803 during the period measured by the 2017-2021 American Community Survey, which is an inflation-adjusted increase of 27% since 1999.

SUMMARY OF CONCLUSIONS

- Dunstable had no Subsidized Housing Inventory (SHI) units as of February 2023.
- There are a significant number of residents at very low incomes and extremely low incomes, and their housing needs aren't being met.
- Homeownership is increasingly out of reach for the median income earner.
- Two-family housing is not allowed in 97.1% of the town, and two acre minimum lot sizes are required for single family houses..
- Dunstable does not reflect the diversity of other neighboring suburban and rural communities in the region, raising fair housing concerns.
- Dunstable has a growing senior population that may need affordable and fully-accessible housing.
- Infrastructure capacity varies across the town, and maintaining a high quality of town services is important.

At the most extreme end of the income spectrum, many families fall under the poverty threshold. For example, a family of three making \$24,860 or less annually is considered living under poverty (see **Table 13**). According to the 2017-21 American Community Survey, 1.4% of the population, or 41 Dunstable residents were in poverty.

There is not enough housing in Dunstable that is affordable to these populations. In 2015-19, 83% of Extremely Low Income households in Dunstable were severely cost burdened, paying more than 50% of their income on housing costs. Similarly, 27% of Very Low Income were severely cost burdened (see **Table 31**). An additional 7% of Extremely Low Income households and 53% of Very Low Income were moderately cost burdened, paying between 30% and 50% of their income on housing costs. In total, an estimated 264 Dunstable households (22%) were moderately or severely cost-burdened during the 2015-2019 period.

Homeownership is increasingly out of reach for the median income earner.

Limited housing production in Dunstable results in median sales price no longer affordable to the median household, let alone to many young families just starting out.

As of 2017-21, Dunstable's median household income was \$177,803, while the median single family home (\$719,000 in 2022) requires an income of approximately \$191,440 to be affordable. Similarly, as of 2017-21, an estimated 41% of total owner households (443 households), made less than \$150,000 per year.³⁰ In other words, the median single family home is unaffordable for at least 41%, and likely a higher proportion, of the owner households living in town. Not only is this number likely higher because an unknown number make between \$150,000 and \$191,440, but also available estimates of housing burden do not include utilities or other housing costs besides mortgage, taxes, and insurance. Similarly, the current median gross rent in Dunstable is unaffordable for an estimated 57% of the renter occupied households living in town. Moreover, Dunstable has a very small number of rental units compared to Lowell's other suburbs.

These high costs may result in difficulty for young families to find housing in Dunstable. The small number of households with heads of household 15 to 34 years is particularly notable. There were 6.9% households (family and nonfamily combined) in this cohort in Dunstable in 2017-21. During the same period, there were 17% households in this cohort in Greater Lowell (12% excluding the City of Lowell).

Two-family housing is not allowed in 97.1% of the town, and two acre minimum lot sizes are required for single family houses.

The Single Family Residence (R-1) district (96.3% of the town) and the Commercial Recreational (R-1a) district (1.9% of the town) do not allow two-family housing, except in the Town Center District overlay district (0.8% of the town) and the Mixed-Use District overlay district (0.4% of the town). The R-1 district

³⁰ Source: U.S. Census Bureau, 2017-21 American Community Survey, Five-Year estimates, Table S2503. Data does not break down incomes by tenure above \$150,000.

exclusive of the TCD and MUD is 95.2% of the town, meaning that combined with the R-1a district, two-family housing is not allowed in 97.1% of the town.

As a result, an estimated 98% of all housing units in Dunstable were single family homes or mixed-use with a single unit according to NMCOG's analysis of 2022 assessor's data. Furthermore, all 74 new housing units that were permitted between 2012 and 2021 were single family detached dwellings. Dunstable's housing inventory overwhelmingly consists of single family detached homes, and although the number of units is growing, new units appear to be entirely single family detached homes. This points to a need for more diverse housing types to make Dunstable more accessible for different types of households.

In addition, the two acre minimum lot size requirement for single family homes likely incentivizes larger, more expensive home construction. It is unknown whether Accessory Dwelling Units (ADUs) are being established, and it is recommended that Dunstable track and record ADU permits.

Dunstable does not reflect the diversity of other neighboring suburban and rural communities in the region, raising fair housing concerns.

Non-Hispanic or Latino/a White people remain the largest race/ethnicity in Dunstable, composing 87% of the population, down from 98% in 2000. That said, unlike trends in the region and state, all households identifying as non-white were estimated to have incomes of at least \$75,000. Also unlike trends in the region and state, all households identifying as non-white owned their homes rather than rented. In other words, all Dunstable renters were estimated to be white.

Overall, Dunstable's proportion of White residents is significantly higher than other communities in the region. This suggests that there are factors such as lack of housing choice, housing unaffordability, zoning policy, or mortgage lending practices that prevent households with People of Color moving to the community.

Dunstable has a growing senior population that may need affordable and fully-accessible housing.

Households headed by individuals aged 65 years and older are a fast growing proportion of all Dunstable households. Households with heads of household age 65 years and older have increased as a proportion of total family households from 12% in 2000 to an estimated 25% in 2017-2021. MassDOT projects this proportion to grow to 35% by 2050. Unfortunately, 61% of the population living in poverty (25 individuals), were 65 years or older. This is much higher than averages in Greater Lowell or Massachusetts, as these generally see a greater proportion of young people of their populations living in poverty.

This Housing Production Plan needs to be sensitive to the needs of elders and those with disabilities in considering future affordable housing developments. This needn't mean housing that is age- or disability- restricted. Rather, it indicates a need for ensuring housing is accessible, ideally within accessible neighborhoods that allow seniors or people with disabilities a variety of accessible

transportation and recreation options. It may also indicate a need for supportive programs, including providing options to age in place or downsize without moving out of town. Given the limited resources available to the elderly and the projected growth for this age cohort, the Town will need to keep in mind their special circumstances and work with partners to address those needs.

Infrastructure capacity varies across the town, and maintaining a high quality of Town services is important.

Although water and transportation capacity and lack of a public sewage system do not currently seem to directly limit the production of affordable housing in Dunstable, these capacities are not evenly distributed across the town. The public water supply is limited to around 102 connections, and extensions of the existing supply lines along with additional connections would be required to service new dwellings outside of the current service area. A lack of suitable water supply may hinder denser development patterns including multifamily dwellings, subdivisions, and mixed-use developments with strong potential for affordable housing development. In addition, response at public meetings and through the survey indicated the importance of maintaining high quality of services, including infrastructure, schools, and emergency response as the town grows and changes.

With that in mind, the Town may consider different approaches to mitigate these capacity issues to reach its housing goals. That may include the promotion of water conservation efforts, the targeting of development where there is existing capacity, or making targeted capacity upgrades such as expansion of water supply lines that would allow the Town to meet its housing goals. It also suggests promoting development patterns that most efficiently and fully make use of existing or planned infrastructure.

CHAPTER 3

Housing Goals

Housing Production Plans may include two types of goals:

- **Quantitative goals**, which are numerical targets such as the goal of producing several affordable units equal to 0.5% or 1.0% of year-round housing units as described in Section 1.A; and
- **Qualitative goals**, which describe aspirational statements of the types of housing being produced, people being served, or how needs are met.

This Housing Production Plan starts with a vision statement developed based on community input gathered throughout the planning process. Then, goals were developed to address each of the Comprehensive Needs Assessment conclusions listed in **Section 2.G**. For each goal, a qualitative “indicator” was selected to track progress toward that goal. In the next chapter, an action plan of strategies to achieve the goals is laid out, including characteristics of ideal affordable housing, a list of potential sites selected based on those characteristics, regional partnerships to achieve shared goals, and other recommended zoning changes, policies, investments, or actions to achieve the goals.

A. Dunstable’s Housing Vision

Visioning is a collaborative process to express desired characteristics of a community or an element of a community. Although a vision cannot include every opinion, it can represent a melding of input into common themes and ideals. This plan strives to express a vision that is inclusive of the many, diverse voices that provided input into the plan. The goals in this chapter will address the challenges identified in the Comprehensive Needs Assessment while working toward the desired vision of Dunstable:

Dunstable will be a community that has a balanced mix of housing that is appropriate and accessible to all types of households. We will provide homes for all stages of life, including starter homes suitable for young families and units that are accessible and affordable to seniors, including multifamily housing. Our housing will be inclusive, with options for all. As Dunstable grows, it will meet housing needs while continuing to strengthen the town center and retaining its rural design aesthetic, working farms, and open space.

B. Affordable Housing Production Goal

The State’s Housing Production Plan guidelines require that the Plan to include an annual, numerical goal for housing production. This numerical goal is based on the Town’s total year-round number of housing units; by advancing the strategies recommended in this Plan, Dunstable should see an increase in the municipality’s number of Subsidized Housing Inventory (SHI) Eligible Housing units by at least 0.50% of its total units during every calendar year included in the Plan until the overall percentage of units listed on the SHI exceeds the 10% Statutory Minimum. There should be a direct link between the setting of these goals and the results of the needs assessment.

The 0.5% goal for Dunstable is 6 units in a single calendar year, and the 1.0% goal is 11 units in a single calendar year. In addition, continued subsidized unit development may help Dunstable reach other goals, such as easing the housing cost burden of those who may qualify for Affordable Housing, especially those paying more than half their income on housing. The Comprehensive Housing Affordability Strategy data set estimates a number for this:

As of the most recent data (2015-19 ACS), an estimated 70 households below 80% AMI pay more than 50% of their annual income on housing costs.

Two scenarios are laid out below: one with the 0.5% goal and one with the high end of the 1.0% goal. These are shown in **Table 40**, which assumes Dunstable grows at roughly the same rate of total units as its previous 10-year permitting average (see **Section B.5**). Notably, the table shows market rate units being converted to Subsidized Housing Inventory (SHI) units. If this does not happen, Dunstable would have to produce more total housing units than its previous 10-year average to reach its SHI goals. It is on track to do this in the near-term due to the development at 160-164 Pleasant Street.

Table 40: SHI-Eligible Housing Production Goal in Scenario A and Scenario B

A: Year	B: End of Year Total Year-Round Units	C: Net new Year-Round units	D: End of Year SHI Units	E: Net new SHI units	F: Percent of Total Units on SHI	G: Percent of 2020 Census Count Total Units on SHI
Scenario A (0.5% goal, 6 units per year)						
2023	1,166	7.15	45	45	3.9%	3.9%
2024	1,174	7.15	51	6	4.3%	4.5%
2025	1,181	7.15	57	6	4.8%	5.0%
2026	1,188	7.15	63	6	5.3%	5.5%
2027	1,195	7.15	69	6	5.8%	6.0%
Scenario B (1.0% goal, 12 units per year)						
2023	1,166	7.15	45	45	3.9%	3.9%
2024	1,174	7.15	57	12	4.9%	5.0%
2025	1,181	7.15	69	12	5.8%	6.0%
2026	1,188	7.15	81	12	6.8%	7.1%
2027	1,195	7.15	93	12	7.8%	8.1%

Source: NMCOC Analysis. This table estimates the total number of Year-Round units by starting at the approved year-round number at the 2020 census (1,145 year-round units) and projecting that forward by 7.15 units annually.

Goals are updated by the Executive Office of Housing and Livable Communities (EOHLC) once every ten years based on Decennial Census counts. Because it is ideal for a community to maintain its 10% goal year-to-year, Column F tracks the percentage of each year’s projected total year-round households that would be on the SHI, while Column G tracks the percentage of 2020 year-round units that would be on the SHI. SHI units in the pipeline are shown in the row for 2023.

Finding: An estimated 70 households that earn 80% of AMI or less pay 50% or more of their income on housing, but Dunstable had no Subsidized Housing Inventory (SHI) units as of February 2023.

Goal 1: Produce an average of at least 6 and preferably 12 SHI units each year. This goal is reflected in **Table 40** above.³¹

Indicators: Number of units that are added to the SHI

³¹ At the time of writing, EOHLC had not released the 2020 HPP Production goals. These goals may vary slightly from the goals that were estimated in this HPP. The Town of Dunstable pledges to comply with the final 2020 HPP Production goals when they are released.

C. Qualitative Goals

Fourteen qualitative goals were developed based on the Housing Vision, articulated in **Section A** above, to address each of the eight Comprehensive Needs Assessment findings listed in **Section G**. The goals are grouped below by the findings they seek to address, and each goal has been paired with a quantitative indicator that can be used to measure progress toward the goal. These goals are in no particular order, and their order does not indicate priority. Note that goals describe **what** the community wants to achieve. **How** the community can achieve the goals is explored in the next chapter, Implementation Strategies.

Finding: There are a significant number of residents who make very low incomes and extremely low incomes, and their housing needs aren't being met.

Goal 2: Create safe, comfortable, affordable units through new construction, conversion, or adaptive reuse, especially those that are targeted to households making an income at 60% AMI or lower.

Indicators: *Number of units that are added to the SHI, qualifying income levels of units*

Goal 3: Build awareness about affordable housing needs, create opportunities to build consensus on how to meet those needs, and clearly communicate housing-related issues and opportunities to provide feedback to community members.

Indicator: *Number of educational and training opportunities provided, number of people in attendance, number of people accessing opportunities*

Goal 4: Ensure newly-created income-restricted units are monitored, maintained as affordable, and continue meeting all the requirements of their respective deed restrictions.

Indicator: *Number of units that are removed from the SHI*

Finding: Homeownership is increasingly out of reach for the median income earner.

Goal 5: Create more diverse types and sizes of ownership units, including types such as smaller single family detached, duplexes, and townhouses at accessible prices that could serve as "starter homes"

Indicator: *Median sales price for condos and single family detached homes, number of non-single family homes created*

Goal 6: Develop ladders to homeownership in Dunstable both for Dunstable residents and those who may wish to settle in Dunstable.

Indicator: *Number of first-time homebuyers in Dunstable*

Finding: Two-family housing is not allowed in 97.1% of the town, and two acre minimum lot sizes are required for single family houses.

Goal 7: Increase the land that allows types of housing other than single family detached by right or by special permit while protecting specific Areas of Critical Environmental Concern (ACEC), such as the Petapawag ACEC.

Indicators: *Percent of land available for residential uses other than single family detached*

Goal 8: Provide equitable access to affordable homeownership and rental homes suitable for a variety of household types, including single bedroom apartments and homes with multiple bedrooms suitable for families with children.

Indicator: *Number of units by number of bedrooms, number of non-single family homes created*

Finding: Dunstable does not reflect the diversity of other neighboring suburban and rural communities in the region, raising fair housing concerns.

Goal 9: Ensure that mortgages or leases are monitored for discrimination and ensure Dunstable housing is welcoming and accessible to all.

Indicators: *Number of mortgages applied for and approved by nonwhite or Hispanic or Latino/a households, complaints recorded by the Massachusetts Commission Against Discrimination*

Goal 10: Actively address racial and other disparities by including people of diverse races, ethnicities, ages, and backgrounds in housing decision-making processes.

Indicator: *Number of people who have diverse lived experiences in roles that impact housing production, both decision-making and advisory roles on the Planning Board, Conservation Commission, Affordable Housing Committee, and other capacities.*

Finding: Dunstable has a growing senior population that may need affordable and fully-accessible housing.

Goal 11: Increase the proportion of fully Americans with Disabilities Act (ADA) accessible or adaptable housing units that meet the needs of people with mobility or other impairments through new construction or conversion.

Indicator: *Number of ADA accessible or adaptable housing units*

Goal 12: Emphasize the creation of complete neighborhoods when amending zoning and considering new development (complete neighborhoods provide a variety of housing types which may include multifamily, townhouses, duplexes, and smaller single family detached homes and equitable, safe, and walkable with multimodal access to green spaces and other town amenities).

Indicators: *Average Vehicle Miles Traveled, diversity of housing units and typologies in neighborhoods, proximity of new housing to parks and open spaces*

Finding: Infrastructure capacity varies across the town, and maintaining a high quality of town services is important.

Goal 13: Increase infrastructure capacity in areas targeted for development or redevelopment.

Indicator: *Number of households water infrastructure can support in targeted areas*

Goal 14: Encourage development patterns that make wise use of existing resources and incorporate water and energy conservation and other sustainable practices for existing and new affordable and market-rate housing development.

Indicator: *Average water, wastewater, and energy use per household*

Goal 15: Continue to provide new and existing homes with high-quality services such as education, emergency response, fire protection, and police protection in a cost-effective way.

Indicator: *Appropriate tracking measures from service providers*

CHAPTER 4

Implementation Strategies

The DHCD [now EOHLC] Housing Production Plan Guidelines³² state that Housing Production Plans should have an “explanation of the specific strategies will achieve its housing production goals as well as a time frame/schedule for achieving the housing goals identified.” The strategies in the Dunstable Housing Production Plan are divided into five sections:

- F. **Implementation Strategies**, which are specific actions the town or other agencies will undertake to meet the goals articulated in the previous Section;
- G. **Attributes of Proposed Residential or Mixed-Use Developments**, which is a list of attributes such as performance standards and location to guide siting and features of housing development;
- H. **Proposed Modifications to Zoning Districts**, which is a list of Implementation Strategies that modify zoning;
- I. **Land with Potential for Affordable Housing**, which are lists of specific parcels chosen based on the attributes described in Subsection B that the town will encourage Comprehensive Permit (40B) developments or will pursue issuing Requests for Proposals (RFPs); and
- J. **Regional Collaborations**, which is a list of Implementation Strategies that will require or would benefit from regional collaborations.

A. Implementation Strategies

The 23 implementation strategies below have been chosen to be realistic and achievable by the Town or other partners in the five-year performance period of this Plan. Some require cooperation between public and private actors, while others are actions that the Town may take on its own. In addition, strategies could be time-constrained (the strategy is complete when the action is taken, i.e., adopting an amendment to zoning) or could be open-ended (the strategy is ongoing, i.e., encouraging certain types of development). Each implementation strategy may advance one or more goals.

1. Affordable Housing Production

1.1. Encourage Comprehensive Permit (40B) Developments that meet the attributes described in Section 4.C.

To effectively meet the goals of this Housing Production Plan, the Town should clearly communicate preferences for the type, location, and design of local affordable housing. The Town should provide prospective developers with application guidelines and meet with them to ensure an understanding of the development review process and timeline. Although not all attributes can be met in all circumstances due to funding restrictions, site constraints, or other issues, clearly communicating desired attributes can benefit both the community and developers. Higher-quality developers are attracted to communities that clearly articulate their preferences in advance of proposals.

³² "Housing Production Plan Section II. B of M.G.L. c. 40B Comprehensive Permit Projects Subsidized Housing Inventory Guidelines." DHCD, Updated 2014. Retrieved from <https://www.mass.gov/doc/hpp-guidelines/download>

Mechanisms to encourage 40B development that meet desired attributes includes holding educational and outreach sessions about the Housing Production Plan, continuing discussions about Section 4.C with potential developers, making sure the Zoning Board of Appeals and Select Board are aware of Section 4.C, guiding developers to meet those preferred attributes, and posting the Housing Production Plan on the Town's website and in other locations to allow developers to learn more about opportunities when considering building in Dunstable.

1.2. Strengthen the Administration of the Affordable Housing Trust Fund and work with the Trust to develop an action plan.

At the October 15, 2019 Special Town Meeting, voters approved allocation of \$150,000 to the Affordable Housing Trust Fund. In addition, the Community Housing Bylaw allows for payments by developers into the Affordable Housing Trust Fund.

The town should complete additional administrative steps related to the trust fund in order to maintain a source of funding for future local affordable housing developments and advance other goals of this Plan. This includes filling any vacancies on the Board of Trustees. Additionally, the Trust should create an agreement with the Community Preservation Committee for the appropriation of Community Preservation Act funds dedicated to “Community Housing” goals to the Trust; this action may be in tandem with the development of an Action Plan.

An Action Plan would utilize the strategies from this Plan and guide the Trustees in investing and leveraging funding in the development of Affordable Housing. The purpose of the Action Plan would be as follows: to create a transparent and clear plan for use by the Trustees to communicate their work, goals, and priority initiatives to the community; to identify one or more areas of focus for the Trust based on available and anticipated resources combined with community-informed goals for the production and preservation of affordable housing; and to ensure that Trust resources are used to further the Town’s goals and objectives in addressing local housing needs and related community goals. The Action Plan could also include a preference to be the “first in” as a required match for state or federal programs or a preference for projects that aim to incorporate attributes outlined in **Section 4.C** and/or developments located in **E Land with Potential for Affordable Housing**.

1.3. Work with regional nonprofit organizations to identify sites and policy barriers to developing homes that are affordable to people at 60% Area Median Income (AMI) or less.

Dunstable may benefit from closely working with regional nonprofit organizations with experience in the construction of affordable housing such as Coalition for a Better Acre (CBA), Common Ground/CTI, CHOICE, and others. This strategy recognizes that although there is a need for units that are affordable to households making 60% AMI or lower, it is difficult for traditional developers to meet these subsidies through mixed-income development. CBA, Common Ground, and CHOICE are nonprofit housing developers who have deep experience in the Greater Lowell region. Dunstable should work with these or other nonprofit agencies by sharing the Housing Production Plan and the list of preferred housing sites with them and discussing which sites, if any, are appropriate for mixed-income housing with subsidized units. These nonprofits can also help identify the Town’s largest barriers to local affordable housing development.

1.4. Undertake a market study to evaluate and fine-tune the Community Housing Section of the Zoning Bylaw.

A market study should be undertaken to understand how much subsidy a market-rate development at current construction costs and rates could bear. This would assist the Town in evaluating the success of the Community Housing Section of the Zoning Bylaw and whether adjustments could or should be made to encourage additional affordable or market-rate housing development. This type of study can be undertaken by a consultant and should be conducted every five to ten years to evaluate the efficacy of Inclusionary Zoning such as the Community Housing Section.

2. Zoning

2.1. Track the development and use of Accessory Dwelling Units.

While the Town allows the development of Accessory Dwelling Units (ADUs) with proper permitting, tracking the rate, type, number of bedrooms, and location at which they are developed will be vital information to evaluate the success of the ADU Section of the Zoning Bylaw, whether it should be modified, and whether it indicates a need for more multifamily options in certain areas of town. In addition, this may help the Town understand the demographics of who benefits from ADUs. ADUs present an additional opportunity for more affordable living arrangements as well as help older residents age in place, so encouraging their further development expands options for smaller, more affordable housing options. If ADU use appears to be limited, the Town may consider allowing ADUs in newly-constructed detached structures.

2.2. Allow duplex dwellings in R-1 and R-1a districts by right or expand the size of the R-2 district.

Expanding as-of-right development options beyond single family housing for the R-1 and R-1a districts will make diverse and smaller units easier to develop. Currently, only single family dwellings and boarding houses are allowed by right in the R-1 and R-1a districts. Combined, these two districts comprise more than 97% of the land area in Dunstable, meaning that the vast majority of land only allows single family homes unless a developer obtains a special permit for a different housing type.

If it is infeasible to allow duplex dwellings as-of-right in R-1, the Town should consider reducing the size of the R-1 district and expanding the R-2 district, which allows duplexes as-of-right.

Finally, the Town should evaluate allowing conversion of existing structures to two-family or three-family, even if they are on nonconforming lots. This would allow more housing types to be created or large houses to be adapted to Dunstable’s changing needs without impacting the existing aesthetic of Dunstable’s neighborhoods.

2.3. Revise the development requirements for and expand the Mixed-Use Overlay District boundaries.

A wider variety of housing units can be developed and available for residents who may not be able to afford, maintain, or may not want a detached single family house on a two-acre lot. The Mixed-Use District was adopted to encourage the development of affordable housing, in the form of both rental and ownership units. This district allows for “Planned Unit Development for Mixed-Uses”, which contain a mixture of residential uses and other uses, including multifamily dwellings,

by special permit from the Planning Board. The district allows two-family dwellings, townhouses, multifamily dwellings, and over-55 housing, providing the minimum land area per dwelling unit is 5,000 square feet, and that the minimum land area for the development is ten acres. Only one of the five parcels in the Mixed-Use District meets the minimum land area requirement. This district covers 0.36% of the town.

The Town Center District is designed to allow owners of existing historical home sites and qualifying new buildings to incorporate additional uses within the principal or accessory buildings while maintaining the historic integrity of the structures, the site, and the town center area. This District allows the following uses by special permit from the Planning Board: conversion of existing one-family dwellings to two-family dwellings, conversion of existing buildings to allow up to two dwelling units on upper floors of commercial buildings, and authorization of multifamily dwellings existing at the time of adoption of the amendment. The Town Center District covers 0.75% of Dunstable.

Revising the regulations of these districts to allow higher density development types and expanding their overall boundaries will increase overall flexibility of development within Dunstable's existing development pattern and within proximity to local services and amenities.

2.4. Create a new R-3 zoning district(s) with smaller minimum lot size and dimensional requirements near the Town Center and Mixed-Use Overlay Districts.

Most districts require a minimum two-acre lot size with large frontage and yard setback requirements. The Town should consider creating a new zoning district or overlay district that would serve as an intermediate zone between the Mixed-Use Overlay District and the R-1 district that would allow for single family detached on smaller lots such as 10,000 or 20,000 square feet, creating a village-like district. Reducing minimum lot size requirements will allow for higher density development near Dunstable Town Center, as well as preserve more local greenspace. Finally, reducing the amount of land a developer needs to purchase to build a home will make building smaller homes more economically feasible. Design guidelines could be developed to encourage Dunstable's rural design aesthetic in this district.

2.5. Revise the Open Space Development bylaw.

Dunstable's Open Space Development bylaw allows owners of land within the R-1 district to apply for a special permit exempting their land from the lot area and frontage, yard, and width of lot requirements in Section 11 to promote the preservation of open space. The following changes to the bylaw will help increase the amount of affordable housing stock available in Dunstable while also increasing open space in proportion to new developments:

- Lower the development area threshold from 14 acres to 5 acres
- Increase the required amount of open space from 35% to 50% and allow a corresponding increase in density of the remaining developed area
- Encourage or require the designated open space to be located in an area that is connected to other open spaces
- Encourage the designated open space to be utilized for agricultural purposes when feasible and when possible to work in harmony with residential uses

2.6. Consider developing simple, easy-to-follow design guidelines for residential developments and/or applying for Design Review Assistance

The rural aesthetic of Dunstable is highly valued. In addition, according to the Dunstable 2018 Master Plan, “Landscaping standards and sign and lighting regulations need to be enhanced to address size and illumination, and these standards need to be updated to reflect new technologies. Building design standards for exterior materials, massing and articulation, roof pitch, window areas and treatment, also need to be improved to provide added specificity. Such design guidelines would allow the Planning Board to consider factors beyond engineering and site design.” These guidelines could also include preferred types of fencing, accessory building design, and methods of clustering buildings. These guidelines should include all types of residential development, including but not limited to single family and multifamily.

If implemented, standards must be clear, unambiguous, and easy-to-follow as to not negatively impact housing production or increase the cost of housing development. However, if they are clearly articulated, they could enhance the design in the units that are created by the strategies listed above and also serve as a supplement to **Section 4.C. Desired Attributes of Affordable Housing**.

Finally, the Town should consider applying for Design Review assistance in evaluating Comprehensive Permit (40B) proposals through the Massachusetts Housing Partnership Technical Assistance program.³³ This program will provide technical assistance in evaluating the design of specific Comprehensive Permit projects based on the town’s desired attributes.

3. Infrastructure

3.1. Evaluate local infrastructure capacity.

The Town should identify areas where sufficient capacity exists to target the actions in this Housing Production Plan. Knowing which infrastructure systems and suitable soils are at or above capacity will help direct where best to locate new housing. A simple study could identify locations that have access to the water district and suitable soils for septic development. Actions that could influence housing production include expanding the Mixed-Use Overlay District or the creation of the proposed R-3 District, identifying properties in an Affordable Housing Trust Action Plan, and/or targeting specific sites with housing nonprofit partners.

3.2. Increase infrastructure capacity in targeted areas.

In addition to taking advantage of existing infrastructure, the Town should expand its infrastructure in areas where denser housing development makes sense. This may include seeking funding to expand the water district, water supply capacity, and water supply. This may also include a feasibility study of shared septic systems or package treatment plants and, if appropriate, sharing information or making policy changes to enable and encourage developers to take advantage of such systems.

³³ “40B Technical Assistance Program”, Massachusetts Housing Partnership, retrieved 8/16/2023 from <https://www.mhp.net/community/technical-support>

3.3. Promote water and energy conservation programs.

Both water and energy conservation programs can ensure that the Town is able to accommodate housing demand and reduce costs for residents. By partnering with utilities, nonprofits, or other agencies, the Town can bring and promote such programs in Dunstable .

3.4. Develop or improve connections between sites with existing or potential affordable housing, or high concentrations of housing and key local destinations such as services, jobs, and open space.

To encourage multimodal transportation, Dunstable should prioritize complete streets or trail connections that would provide access from housing to areas of local services or jobs. This may also include exploring installation or improvement of sidewalks, bike paths, pedestrian trails, or transit shelters as part of larger developments should public transportation options expand to Dunstable. The Town should complete walk audits on areas where residential is clustered near services, recreational areas, or jobs.

4. Outreach and Education

4.1. Seek opportunities to educate both the public and committee members about housing-related issues and incorporate community engagement into discussions about affordable housing as well as relevant decision-making.

Public outreach, including workshops, board/committee meetings, social events, and volunteer opportunities, will help increase awareness of housing related-issues and strategies to address housing challenges. The Town should ensure that there is plenty of community input into the development and implementation of housing strategies. One of many possible strategies is the formation of an informal coalition or working group of local or regional nonprofits, developers, and interested residents to strengthen partnerships and provide input and recommendations to Town staff. This may also include targeting younger demographics, including Dunstable-Groton High School students or recent graduates or through activities and media channels young people in Dunstable frequent.

Regional and state organizations may be able to assist in educational opportunities to build support for creation of affordable housing and connecting affordable housing resources including rental assistance, first-time homebuyer programs, and other assistance with the people who need it. This may include sharing stories of people who have benefited from affordable housing, including multifamily affordable housing, connecting housing needs in Dunstable to economic development needs, and sharing stories from similar communities following best housing practices. This may also include participating in the regional housing strategy discussed in Strategy 6.3. The Citizens’ Housing and Planning Association (CHAPA) created a document called The Faces of 40B which can serve as a starting point:

<https://www.chapa.org/sites/default/files/Facesof40B.pdf>. Other agencies that could assist include but are not limited to Abundant Housing, Community Teamwork Inc, or other entities.

The education of local boards and committees, including the Select Board, is a critical element of creating and maintaining affordable housing and maintaining compliance with state and federal fair housing laws. Training may include basics or a refresher on fair housing, M.G.L. c. 40B, affordable housing generally, and similar topics. The Citizens’ Housing and Planning Association (CHAPA) is a resource for educating local boards and committees about affordable housing. The University of Massachusetts Extension’s Citizen Planner Training Collaborative (CPTC) also provides training for boards and committees. Training should emphasize the importance of

creating homes that are accessible to all incomes, abilities, and ethnicities to encourage diversity and inclusivity.

4.2. Broadly advertise board/committee member vacancies to reach underrepresented community members.

Advertising open board and committee seats through a variety of outlets, including online, local events, and popular local "third spaces" will reach a wider audience and get attention from community members who can offer a fresh perspective on housing-related issues.

4.3. Provide education on Housing Choice Community Designation to boards and committees that work with land use or housing

Communities with Housing Choice Community Designation status have exclusive access to a grant program specifically for those communities in addition to bonus points on other Massachusetts grant programs. As of August, 2023, seven out of nine Greater Lowell communities are or were designated as Housing Choice Communities. Pepperell and Dunstable had not received that designation. Housing Choice Communities can be designated if they had a 5% increase in new units over the previous 5 years or a 3% increase in the previous 5 years plus demonstrating 7 of 15 best practices identified by the Executive Office of Housing and Livable Communities.³⁴ Based on 2020 census data, that would be 58 units over 5 years for the 5% goal and 35 units over 5 years for the 3% goal. If this Housing Production Plan is fully implemented, Dunstable may meet the requirements of Housing Choice Community designation. The Town should actively educate the Affordable Housing Committee, the Planning Board, and other boards and committees on the requirements for Housing Choice Community designation and the strategies within this Plan to achieve that designation.

5. Equity

5.1. Conduct an equity audit on Dunstable's residential zoning to determine whether or not it has a disproportionately adverse impact on Black, Indigenous, and People of Color (BIPOC) and other groups protected under state and federal fair housing laws.

In addition to discriminatory lending and other real estate practices, the foundation of the housing system is established in land use and zoning. Those systems and policies have created documented discriminatory effects and have led to income and racial disparities, including disparities in access to housing opportunities, across the region. An equity audit would specifically aim to evaluate the impact of local land use and zoning policies and practices on racial and ethnic diversity, income diversity, and equity for people with disabilities, families with children, and others. The audit may also provide additional information to guide revisions to Dunstable's zoning bylaw, related policies, the zoning map, and zoning procedures and practices.

This audit should include recent overlay districts, including the Senior Residential Multi-Family District section. This should also include evaluation of accommodation of assisted living facilities, childcare facilities, or other facilities that serve families with children, populations with special needs, and populations of all ages.

³⁴ Housing Choice Best Practices 2023, EOHL. Retrieved 8/16/2023 from <https://www.mass.gov/how-to/housing-choice-designation-application>

5.2. Work with housing partners to identify and distribute information about housing improvements that could be used to increase overall accessibility of units for persons living with disabilities.

Input received during the planning process indicated a strong desire to age in place. In addition, accessibility improvements benefit all types of people. One way to increase accessibility for both residents of housing and visitors for those residents is to bring existing units to Americans with Disabilities Act (ADA) or more stringent Universal Design standards. Multiple resources are available to finance this work, such as the Home Modification Loan Program. The Town should work with the Dunstable Council on Aging, AARP, and other agencies to identify and distribute information about programs that could provide improvements that would increase the accessibility of units.

5.3. Research residents' use of existing tax abatement programs. Create a marketing and education program to share with eligible groups who are not currently using these programs and guide new users through the process of obtaining tax abatements.

Concerns about taxes were frequently raised during public input. Several classes of people qualify for tax abatement programs, including legally blind people, seniors, minor children of deceased parents, and veterans. Town staff should research how many residents are utilizing these programs against an estimated number of eligible participants and determine whether public education about these programs should and can be enhanced. This project could be undertaken by the Affordable Housing Committee or the Dunstable Council on Aging.

5.4. Work with Northern Middlesex Council of Governments (NMCOG) to participate and support a dashboard updated annually of Home Mortgage Disclosure Act (HMDA) data and Massachusetts Commission Against Discrimination (MCAD), including collaboratively determining key metrics to track, and share these data via the Town website and other channels.

The HMDA requires many financial institutions to maintain, report, and publicly disclose loan-level information about mortgages. The Massachusetts MCAD is the independent state agency that enforces the Massachusetts anti-discrimination laws by investigating discrimination complaints to determine if the case may proceed to conciliation or a public hearing at the Commission. The MCAD also offers remedial and preventative training, and publishes resources online such as model policies, posters, and guides.

For the purposes of regional housing planning, NMCOG is currently collecting data from both sources, which includes comprehensive information about home loans, socio-economic information about borrowers, and outcomes of loans, and tenant complaints related to discrimination. Tracking and analyzing this data over time can reveal whether there are intentional or unintentional patterns of discrimination in Dunstable and in the region. The Town should collaborate with NMCOG to determine the best measures to track and the best way to publicly share this information on an annual basis.

6. Collaboration

6.1. Participate in the Regional Housing Workgroup to help the Town of Dunstable achieve and maintain affordable housing goals through interregional partnerships.

Effectively monitoring the Subsidized Housing Inventory (SHI) of affordable housing requires time and resources. NMCOG is currently facilitating a Regional Housing Workgroup consisting of representatives from its nine member communities, seven housing authorities, and several affordable housing committees to explore the development of a regional partnership to ensure

that communities across the region can achieve and maintain affordable housing goals, including maintaining existing subsidized housing inventories. Now that Dunstable is adding new units to its SHI (anticipated 45 in the next year), it is an ideal time to consider the best way to monitor these units. A higher level of monitoring provides benefits to communities, to owners of deed-restricted affordable housing, renters of affordable housing, and people seeking affordable housing.

Additional information can be added to a local or regional database that is not in the state database, such as the number of income-restricted units in a mixed-income rental development. This information could be used to better prepare for when income-restricted units have expiring affordability, evaluate the supply of affordable housing compared to the demand in long-term planning, and assist those seeking affordable housing.

6.2. Strengthen communication among local and regional housing entities.

Tighter connections among Dunstable staff, elected leaders, housing committees, nonprofits, and other groups will help these entities formulate a comprehensive set of long-term goals, understand a variety of housing-related issues to address, and collaborate on policies and projects to tackle various housing challenges the Town faces. This should include interfacing with entities that provide first-time homebuyer programs to understand opportunities and challenges in Dunstable for first-time homebuyers. The Town could schedule an annual coordinating meeting among these parties after Annual Town Meeting wherein the groups could discuss accomplishments, set annual goals, and identify priorities on which to work in advance of the next year's Town Meeting schedule.

6.3. Work with NMCOG to develop a Regional Housing Strategy for the Greater Lowell Region.

Housing challenges typically do not stop at local borders, and housing affordability in Dunstable is impacted by and impacts neighboring communities. NMCOG has received feedback in multiple planning processes that a lack of affordability and availability of housing as the most pressing economic and quality of life issue in Greater Lowell, which includes Dunstable and eight other communities. This has created a crisis of homelessness, severely impacted quality of life, and hindered regional firms' ability to recruit and retain talent. NMCOG communities have voiced support for a Regional Housing Strategy that will supplement and support local Housing Production Plans and other local policy and planning work.

NMCOG is developing a scope of work for a plan to create a shared regional vision of fair, equitable access to homes in Greater Lowell and build local commitment to working toward that vision. The vision will include local benchmarks for housing affordability and/or creation, in number and type, tailored for each community for use in local Housing Production Plans and other planning and policy. The plan will provide communities and agencies with needed direction and tools to enact policy changes and prioritize policies that will make the biggest impact where it's needed. This includes building public awareness and shared understanding of local and regional housing conditions and breaking down myths about housing production. This will include collecting the stories of individuals with a variety of backgrounds and housing situations that will be shared to advance the public conversation. Dunstable should work closely with NMCOG to support this planning process through staff involvement, data sharing, letters of support, and public commitment to working together with other communities to confront and create solutions to shared housing challenges.

B. Action Plan

The above strategies have been arranged into a five-year action plan, with each year containing low, medium, and high priority activities. This is intended to help guide the Town to make steady progress toward the goals of the Plan and track its progress.

Table 41: Action Plan

No	Strategy	Goals Advanced	Lead, Partners	Priority	Target Completion
1.1	Encourage Comprehensive Permit (40B) Developments that meet the attributes described in Section 4.C.	1, 2, 4, 5, 12	Town Administrator, AHC, ZBA	High	Ongoing Starting Now
1.2	Strengthen the Administration of the Affordable Housing Trust Fund and work with the Trust to develop an action plan.	1, 2, 4, 5, 6, 7	Town Administrator, AHT	High	2023
1.3	Work with regional nonprofit organizations to identify sites and policy barriers to developing homes that are affordable to people at 60% Area Median Income (AMI) or less.	2, 3, 4, 5, 6, 8	Town Administrator, AHC	Medium	2026
1.4	Undertake a market study to evaluate and fine-tune the Community Housing Section of the Zoning Bylaw.	1, 2	Town Administrator, AHC	Low	2028
2.1	Track the development and use of Accessory Dwelling Units.	1, 2, 5, 7, 8, 11, 12	Town Administrator	High	Ongoing Starting Now
2.2	Allow duplex dwellings in R-1 and R-1a districts by right or expand the size of the R-2 district.	3, 5, 7, 8, 12	AHC, Planning Board	Medium	2026
2.3	Revise the development requirements for and expand the Mixed-Use Overlay District boundaries.	3, 5, 7, 8, 12, 14	AHC, Planning Board	Low	2028
2.4	Create a new R-3 zoning district(s) with smaller minimum lot size and dimensional requirements near the Town Center and Mixed-Use Overlay Districts.	2, 3, 5, 7, 8, 12, 14	AHC, Planning Board	Medium	2026
2.5	Revise the Open Space Development bylaw.	1, 2, 4, 5, 6	AHC, Planning Board	Low	2028
2.6	Develop simple, easy-to-follow design standards for developments over a certain number of units and/or multifamily developments that could also guide Comprehensive Permit projects.	12, 14	Planning Board	Medium	2026
3.1	Evaluate local infrastructure capacity.	14, 15	Town Administrator	Low	2028
3.2	Increase infrastructure capacity in targeted areas.	13	Town Administrator	High	2028

Table 41: Action Plan

No	Strategy	Goals Advanced	Lead, Partners	Priority	Target Completion
3.3	Promote water and energy conservation programs.	14, 15	Board of Public Works	Low	2028
3.4	Develop or improve connections between sites with existing affordable housing, potential for affordable housing, or high concentrations of housing to key local destinations such as services, jobs, and open space.	7, 12, 14, 15	Town Administrator	Low	2028
4.1	Seek opportunities to educate both the public and committee members about housing-related issues and incorporate community engagement into discussions about affordable housing as well as relevant decision-making.	3, 6, 10	Town Administrator, AHC	Medium	Ongoing Starting Now
4.2	Broadly advertise board/committee member vacancies to reach underrepresented community members.	3, 10	Select Board, Town Administrator	High	Ongoing Starting Now
4.3.	Provide education on Housing Choice Community Designation to boards and committees that work with land use or housing	1	AHC, Town Administrator	High	2024
5.1	Conduct an equity audit on Dunstable's residential zoning to determine whether or not it has a disproportionately adverse impact on Black, Indigenous, and People of Color (BIPOC) and other groups protected under state and federal fair housing laws.	3, 9, 10	Town Administrator, AHC	Medium	2026
5.2	Work with housing partners to identify and distribute information about housing improvements that could be used to increase overall accessibility of units for persons living with disabilities.	11	AHC, Council on Aging	Medium	Ongoing Starting Now
5.3	Research residents' use of existing tax abatement programs. Create a marketing and education program to share with eligible groups who are not currently using these programs and guide new users through the process of obtaining tax abatements.	3, 6	AHC, Council on Aging	Medium	2026

Table 41: Action Plan

No	Strategy	Goals Advanced	Lead, Partners	Priority	Target Completion
5.4	Work with Northern Middlesex Council of Governments (NMCOG) to participate and support a dashboard updated annually of Home Mortgage Disclosure Act (HMDA) data and Massachusetts Commission Against Discrimination (MCAD), including collaboratively determining key metrics to track, and share these data via the Town website and other channels.	9	AHC, Town Administrator	Medium	Ongoing Starting Now
6.1	Participate in the Regional Housing Workgroup to help the Town of Dunstable achieve and maintain affordable housing goals through interregional partnerships.	3, 4, 9, 10, 11, 12, 14, 15	Town Administrator, AHC	High	Ongoing Starting Now
6.2	Strengthen communication among local and regional housing entities.	3, 6, 9, 10	AHC, Town Administrator	High	Ongoing Starting Now
6.3	Work with NMCOG to develop a Regional Housing Strategy for the Greater Lowell Region.	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15	Town Administrator, AHC	Low	2023-24

C. Attributes of Proposed Residential or Mixed-Use Developments

Executive Office of Housing and Livable Communities (EOHLC) Guidelines state that strategies should include “Characteristics of proposed residential or mixed-use developments that would be preferred by the municipality for example, infill development, cluster developments, adaptive re-use, transit-oriented housing, mixed-use development, and/or inclusionary zoning. Preferred characteristics should take into account the surrounding context of the built and natural environment. Characteristics placing special restrictions on the development of affordable housing, such as limiting size of affordable units, limiting diversity in types of housing, or applying other zoning constraints, will not be approved. In addition, affordable housing plans must comply with all state and federal fair housing laws” (c.3).

These attributes provide guidance and criteria for identification of specific sites for which the municipality will encourage the filing of Comprehensive Permit applications and specific publicly owned sites to consider for requests for proposals (RFP) to develop SHI Eligible Housing. These attributes also explain the expectations Dunstable has for affordable housing developments and provide guidance for the Zoning Board of Appeals (ZBA) when considering Comprehensive Permit applications. However, it should be noted that not all attributes can be met in all circumstances due to funding restrictions, site constraints, or other issues.

1. Type

Dunstable prefers a mix of housing types arranged in a village style whenever possible. This would include single family detached units (cottages) on small lots, townhouses, and small multifamily

structures of four to eight units each. Homes that allow multigenerational occupancy, such as small multifamily units that could be affordable to families, are preferred. Developments intended for seniors should include a mix of units available to people at other stages of life to create multigenerational living opportunities when feasible.

Other types of housing are appropriate depending on the context.

2. Location

The following criteria relate to location:

- Development near the existing water district is preferred
- Development near the Town Center Overlay District, or within or near the Mixed-Use Overlay District is highly preferred
- Development within walking/cycling distance (.5 mi) of open space amenities is preferred, especially when it can be positioned to not disturb large, open tracts of land
- Development in specific Areas of Critical Environmental Concern (ACEC), such as the Petapawag ACEC, should be avoided
- Development on land currently or previously categorized as 61B, should be avoided

3. Design

When possible, developments should meet applicable design standards articulated in the Dunstable Zoning Bylaw and the Dunstable Rules and Regulations Governing Site Plans. In addition, an aesthetic design that evokes traditional architecture found in Dunstable is preferred. These guidelines may be further articulated in future design guideline documents.

Developments that have larger numbers than required of fully accessible units are preferred, especially those that are integrated with the rest of the development.

All affordable units constructed or rehabilitated should be situated within the development so as not to be in less desirable locations than market-rate units in the development and shall, on average, be no less accessible to public amenities, such as open space, as the market-rate units. Affordable units within market-rate developments shall be integrated with the rest of the development and shall be compatible in design, appearance, construction, and quality of materials with other units. Interior features of affordable units shall comply in all respects with the minimum design and construction standards of the Executive Office of Housing and Livable Communities (EOHLC) for the Local Initiative Program or other applicable subsidy.

Features that encourage active transportation are highly encouraged. This includes indoor bicycle storage, safe pedestrian connections, and clear drop-off/pick-up zones whenever possible. This also includes electric vehicle (EV) charging stations as appropriate.

Other sustainability features that are preferred include:

- Energy – Features that go beyond minimum codes, especially when those features can reduce long-term maintenance costs or costs to tenants, such as tight weatherization and heat recovery

ventilation; high-efficiency heating system, controls, lighting, and appliances; and integration of solar or other alternative energy technologies

- Storm water – Appropriate best management practices (BMPs) for storm water management, including green infrastructure, rain barrels, or other storm water management strategies
- Open space – Ecologically-beneficial open space such as habitat, pollinator gardens, space suitable for food production, green walls or roofs, or other open space creation that may be affordably integrated into site design
- Light pollution – Appropriate and adjustable brightness for outdoor lights, elimination of light trespass, and promotion of “dark sky” measures
- Water efficiency – Minimization of vegetation requiring permanent irrigation, water-efficient fixtures such as toilets, faucets, washers, and other water-consuming appliances
- Indoor air quality – Moisture control plans, create handling plans for Volatile Organic Compound (VOC) emission, and ventilation
- Construction – Best practices during construction to mitigate or minimize run-off, solid waste, disturbance to habitat, and other temporary and permanent construction impacts

4. Density and Scale

The Town prefers a mix of scales and densities to a single building type when the site allows. This may require changes to setbacks and lot coverage allowed by existing zoning.

5. Affordability Performance Standards

The Town prefers a mix of levels of affordability whenever possible. This includes 30% AMI, 50% AMI, 60%, and 80% AMI levels. The Town would encourage income-restricted units at the 100% or 120% AMI levels in addition to required affordable units at lower levels. The Town prefers developments that include a mix of market rate and affordable units.

D. Proposed Modifications to Zoning Districts to Create SHI Units

Executive Office of Housing and Livable Communities (EOHLC) Guidelines state that strategies should include “The identification of zoning districts or geographic areas in which the municipality proposes to modify current regulations for the purposes of creating SHI Eligible Housing developments to meet its housing production goal. Zoning indicates a community’s interest in the types of uses to be encouraged. The zoning strategy should identify points where the zoning needs to be changed to accommodate additional dwelling units: Can density be increased? Can accessory apartments be accommodated? Are upper story residential units allowed in commercial districts? In identifying geographic areas, communities must ensure that any constraints can be overcome in a timely and cost-effective manner. Additionally, communities should consider the Commonwealth’s Sustainable Development Principles at: <http://www.mass.gov/hed/docs/dhcd/cd/smartgrowth/sdprinciples.pdf>.” (c.1).

Strategies 2.2-2.6 involve changing zoning to reduce barriers to housing development. These are listed on the following table.

Table 42: Strategies that Include Zoning Changes

No	Strategy	Zones Impacted
2.2	Allow duplex dwellings in R-1 and R-1a districts by right or expand the size of the R-2 district.	R-1, R-1a, R-2
2.3	Revise the development requirements for and expand the Mixed-Use Overlay District boundaries.	MUD
2.4	Create a new R-3 zoning district(s) with smaller minimum lot size and dimensional requirements near the Town Center and Mixed-Use Overlay Districts.	New Zoning District
2.5	Revise the Open Space Development bylaw.	All Zoning Districts
2.6	Develop simple, easy-to-follow design standards for developments over a certain number of units and/or multifamily developments that could also guide Comprehensive Permit projects.	All Zoning Districts

E. Land with Potential for Affordable Housing

To assist Dunstable in selecting land with potential for affordable housing, NMCOG developed a scoring criteria that ranked parcels by their alignment to the desired attributes described in **Section C** such as proximity to the Town Center and avoidance of agricultural land. All Dunstable’s Fiscal Year 2023 GIS parcels were scored based on these criteria. Parcels were then given a score of zero if they were identified as open space or electric utility parcels.

Town Staff reviewed the highest-ranked parcels to select sites with a high potential for affordable housing. Staff also added parcels that may have been missed by the GIS analysis. These parcels were analyzed for current use, zoning, location, and site characteristics. NMCOG staff also conducted site analysis to identify the development limitations of the identified properties, which are included under the characteristics column of **Table 43** and **Table 44**.

Map 1 in the **Appendix 1: Maps** shows the location and distribution of these parcels throughout the community, while Map 2 shows the location of these parcels in relation to the current zoning and overlay districts. Map 3 highlights the Wetlands, Floodplains, and Rivers Protection Act (RPA) Regulated Areas.

1. Privately-Owned Land

Executive Office of Housing and Livable Communities Guidelines state that strategies should include “The identification of specific sites for which the municipality will encourage the filing of Comprehensive Permit applications. Identification of specific sites should be consistent, to the greatest extent possible, with Sustainable Development Principles. Strategies should include any proposed zoning changes, advantages to construction on the site, an acknowledgement of site constraints, and the costs to overcome such constraints” (c.2).³⁵

³⁵ "Housing Production Plan Section II. B of M.G.L. c. 40B Comprehensive Permit Projects Subsidized Housing Inventory Guidelines." DHCD, Updated 2014. Retrieved from <https://www.mass.gov/doc/hpp-guidelines/download>

As shown in **Table 43**, two privately-owned sites were identified by the Affordable Housing Committee based on the attributes described in **Section 4.C** above and the compatibility of their current use with redevelopment for housing. This list of privately-owned land with potential for affordable housing will help guide the Town as it moves forward in addressing its affordable housing needs over the next five years. Assuming a fit of 8-12 units per developable acre, these parcels could support roughly 415 to 620 units, although the topography, financial feasibility, and other factors would determine the number and type of units.

Table 43: Privately-Owned Land with Potential for Affordable Housing

Site	Acres	Estimated Developable Acres	Current Use	Characteristics	Zoning District	Zoning Amendment Needed?
“Dumont Property”, 0 Main Street, 396 Main Street, 0 Lowell Street, 19 Lowell Street, 39 Lowell Street	75.83	47.96	Multiple (Single family, manufacturing, undeveloped)	<ul style="list-style-type: none"> Wetlands on large portion of property 	R1, Partially within FOD	Y
479 Main Street	5.00	3.93	Classified as single family residential, but only has one out Building	<ul style="list-style-type: none"> On Town Water Mostly vacant/lawn Partially within 100’ wetland buffer 	R1	Y

2. Publicly Owned Land

Executive Office of Housing and Livable Communities Guidelines state that strategies should include “identification of municipally owned parcels for which the municipality commits to issue requests for proposals (RFP) to develop SHI Eligible Housing, including information on appropriate use of the site, and a timeline for the issuance of an RFP. DHCD [now EOHLC] can provide some assistance in the development of such an RFP” (c.4)

The sites outlined in **Table 44** include parcels that are publicly-owned, do not have conservation restrictions, and have no other identified use. Assuming a fit of 8-12 units per developable acre, these parcels could reasonably support roughly 310 to 460 units, although the topography, financial feasibility, and other factors would determine the number and type of units.

Table 44: Publicly-Owned Land with Potential for Affordable Housing

Site	Acres	Estimated Developable Acres	Current Use	Characteristics	Zoning District	Zoning Amendment Needed?
"Best Triangle", 340 Main Street	3.09	3.09	Classified as public conservation land, but no restrictions exist	<ul style="list-style-type: none"> Wooded 	R1	Y
91 River Street	30.13	30.12	Public Land, Undeveloped	<ul style="list-style-type: none"> Sliver in 100' wetlands buffer Adjacent to protected land Within ACEC 	R1	Y
213 Hall Street	5.59	5.59	Public Land, Undeveloped	<ul style="list-style-type: none"> Includes power ROW Adjacent to protected land Within ACEC 	R1	Y

F. Regional Collaborations

Strategies 1.3, 4.1, 4.9, 5.2, 5.4, 6.1, 6.2, and 6.3 involve working in collaborations with other municipalities or regional nonprofits to advance shared housing goals. These are listed in **Table 45**.

Table 45: Strategies that Include Regional Collaborations

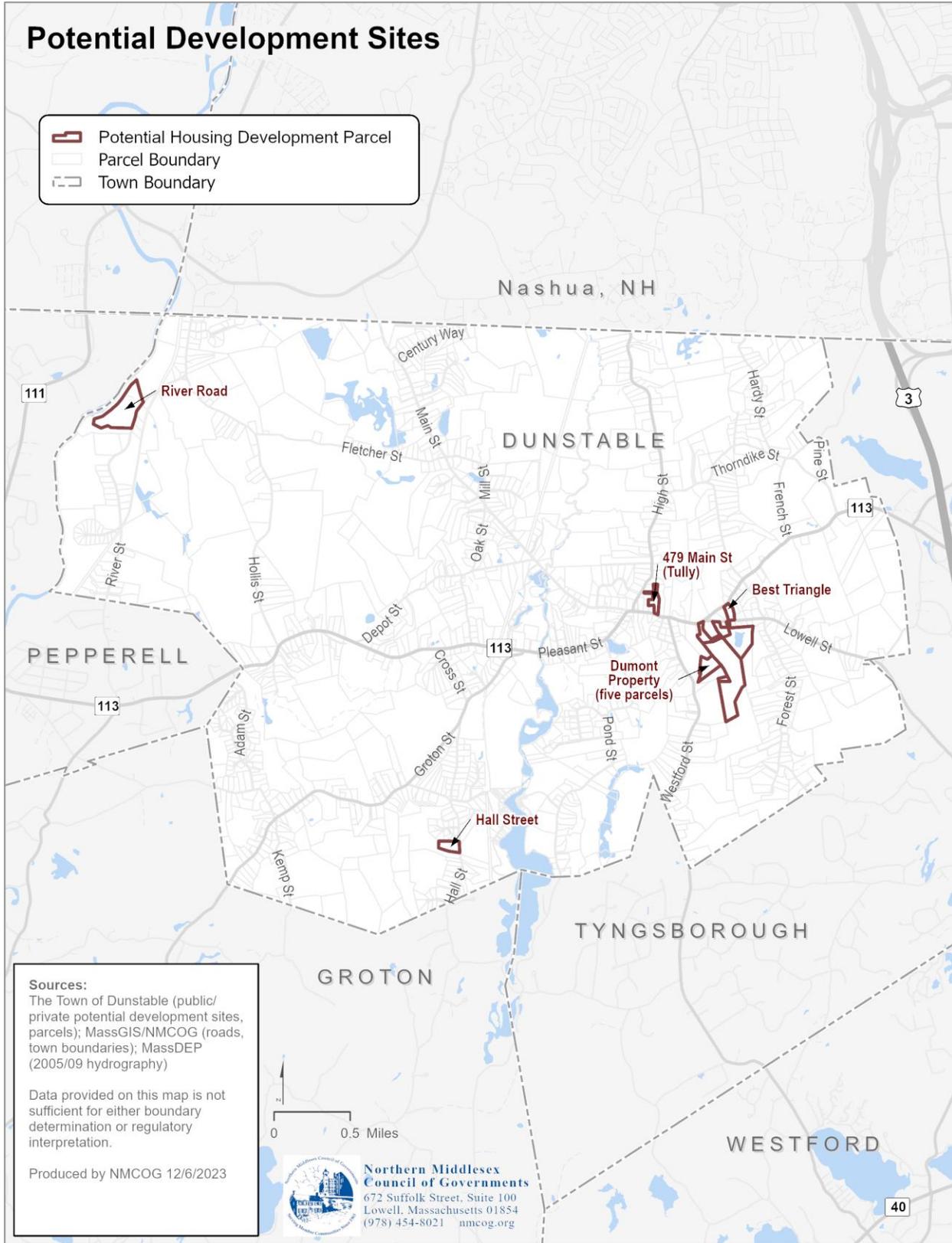
No	Strategy	Possible Partners
1.3	Work with regional nonprofit organizations to identify sites and policy barriers to developing homes that are affordable to people at 60% Area Median Income (AMI) or less.	CBA, Common Ground/CTI, CHOICE, Other agencies
4.1	Seek opportunities to educate both the public and committee members about housing-related issues and incorporate community engagement into discussions about affordable housing as well as relevant decision-making.	Merrimack Valley Housing Partnership, Mass Housing Partnership, Cambodian Mutual Assistance Association, Community Teamwork, Inc, MassHousing, and Habitat for Humanity of Greater Lowell, Other agencies
4.9	Work with partners to identify and distribute information about housing improvements that could be used to increase the accessibility of units.	Nonprofit agencies
5.2	Work with housing partners to identify and distribute information about housing improvements that could be used to increase overall accessibility of units for persons living with disabilities.	Nonprofit agencies
5.4	Work with NMCOG to participate and support a dashboard updated annually of Home Mortgage Disclosure Act data and Massachusetts Commission Against Discrimination, including collaboratively determining key metrics to track, and share these data via the Town website and other channels.	NMCOG
6.1	Participate in the Regional Housing Workgroup to help the Town of Dunstable achieve and maintain affordable housing goals through interregional partnerships.	NMCOG, NMCOG Communities
6.2	Strengthen communication among local and regional housing entities.	Nonprofit agencies
6.3	Work with NMCOG to develop a Regional Housing Strategy for the Greater Lowell Region.	NMCOG, NMCOG Communities

APPENDIX 1

Maps

Potential Development Sites

 Potential Housing Development Parcel
 Parcel Boundary
 Town Boundary



Sources:
 The Town of Dunstable (public/private potential development sites, parcels); MassGIS/NMCOG (roads, town boundaries); MassDEP (2005/09 hydrography)

Data provided on this map is not sufficient for either boundary determination or regulatory interpretation.

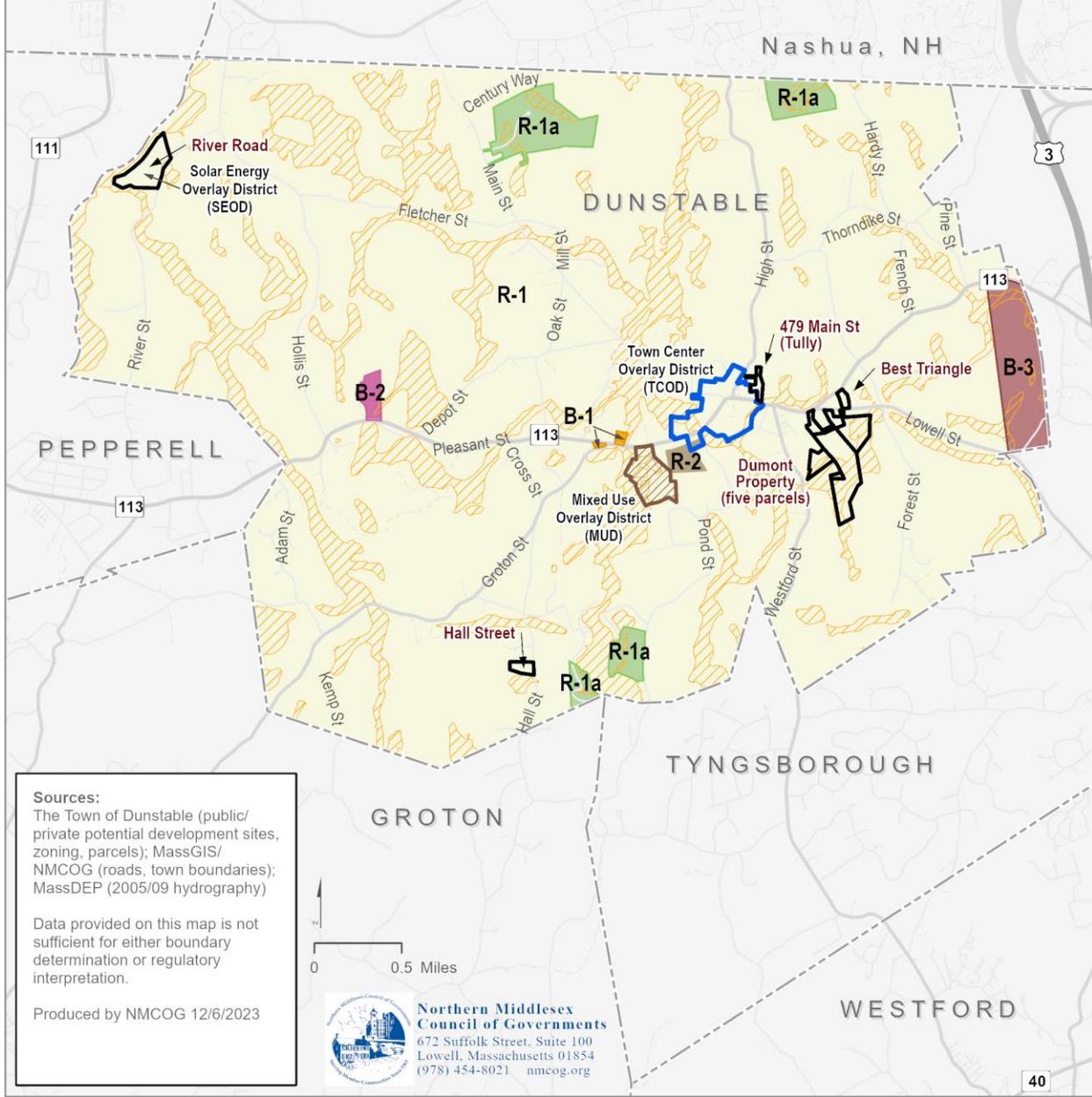
Produced by NMCOG 12/6/2023



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Potential Development Sites and Zoning Districts

Potential Housing Development Parcel	Dunstable Zoning Overlay Districts
Dunstable Zoning Districts	Mixed Use Overlay District (MUD)
Single Family Residence (R-1)	Solar Energy Overlay District (SEOD)
Commercial Recreational (R-1a)	Town Center Overlay District (TCOD)
General Residence (R-2)	Floodplain Overlay District (Zones A and AE)
Retail Business (B-1)	(Tower Overlay District includes all zoning districts)
Service Business (B-2)	
Expanded Commercial (B-3)	



Sources:
 The Town of Dunstable (public/private potential development sites, zoning, parcels); MassGIS/NMCOG (roads, town boundaries); MassDEP (2005/09 hydrography)

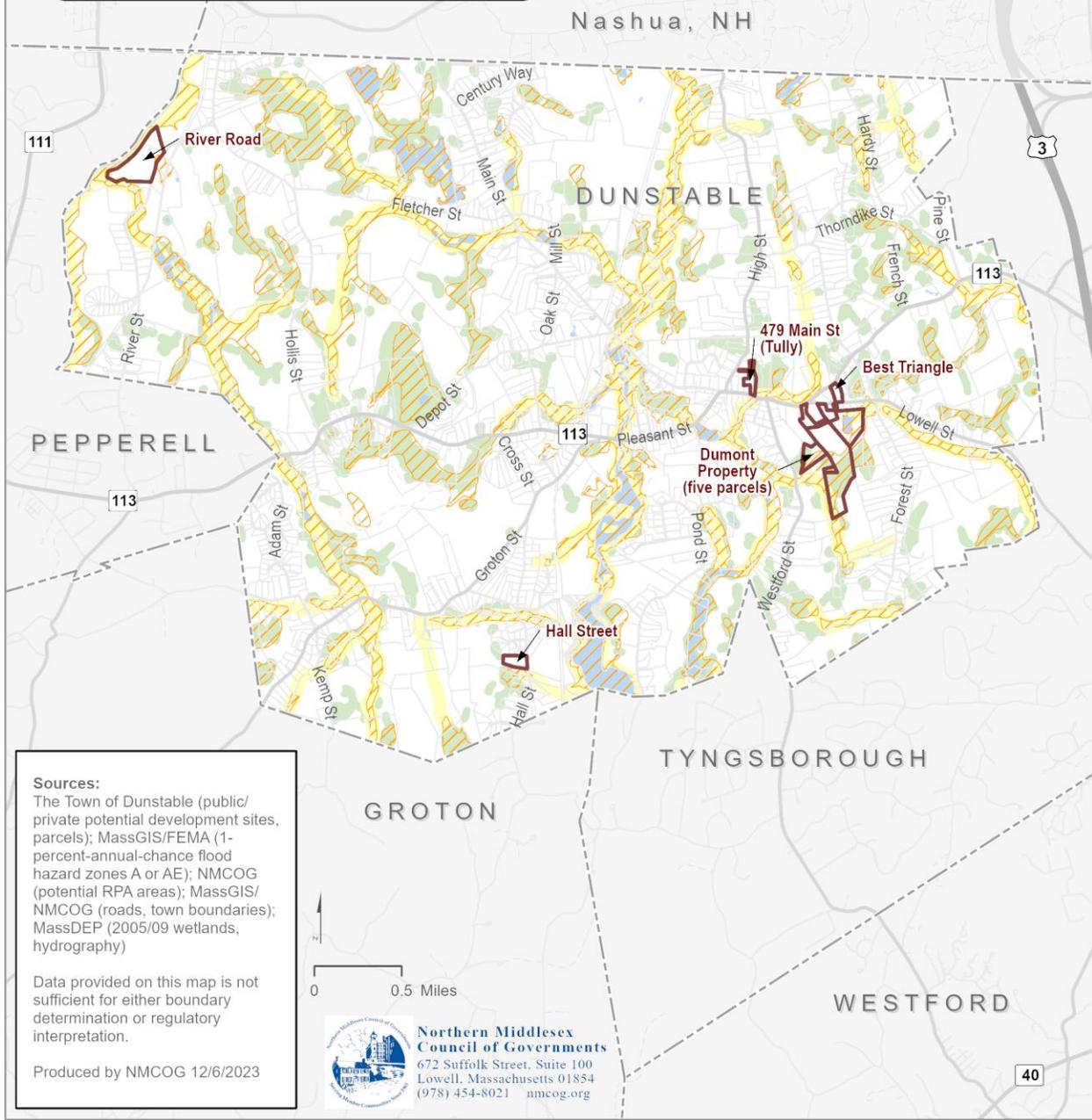
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Potential Development Sites with Wetlands, Floodplains, and Rivers Protection Act Regulated Areas

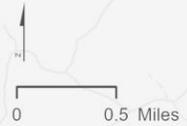
-  Potential Housing Development Parcel
-  FEMA FIRM 1 Pct. Annual Chance Flood Zone
-  Potential Rivers Protection Act Regulated Area
-  Wetlands 100-ft buffer zone
-  Perennial Stream
-  Town Boundary



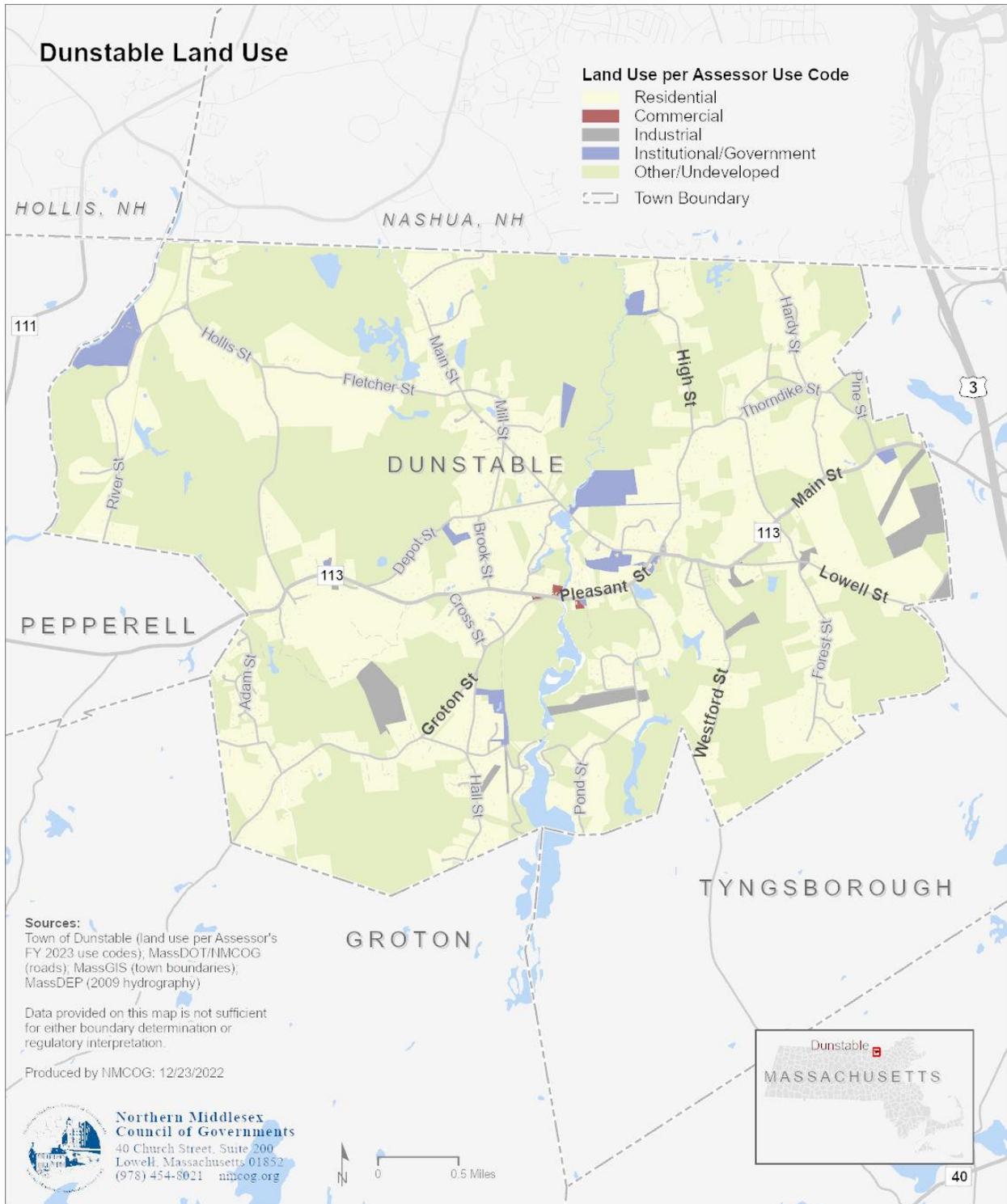
Sources:
 The Town of Dunstable (public/private potential development sites, parcels); MassGIS/FEMA (1-percent-annual-chance flood hazard zones A or AE); NMCOG (potential RPA areas); MassGIS/NMCOG (roads, town boundaries); MassDEP (2005/09 wetlands, hydrography)

Data provided on this map is not sufficient for either boundary determination or regulatory interpretation.

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APPENDIX 2

Acronyms

ACS – American Community Survey

AHC – Dunstable Affordable Housing Committee

ADU – Accessory Dwelling Unit

AHTF – Affordable Housing Trust Fund

AMI – Area Median Income

CHAS – Comprehensive Housing Affordability Strategy

CPA – Community Preservation Act

CPC – Community Preservation Committee

DHCD – Massachusetts Department of Housing and Community Development (Now EOHLC)

EOHLC – Executive Office of Housing and Livable Communities

FMR – Fair Market Rent

HAC – Housing Appeals Committee

HAMFI – HUD Area Median Family Income

HFHGL – Habitat for Humanity of Greater Lowell

HHS – U.S. Department of Health and Human Services

HMDA – Home Mortgage Disclosure Act

HPP – Housing Production Plan

HUD – U.S. Department of Housing and Urban Development

LIP – Local Initiative Program

LIHTC – Low Income Housing Tax Credits

MassDOT – Massachusetts Department of Transportation

MGL – Massachusetts General Law

MPO – Metropolitan Planning Organization

MUD – Mixed Use Overlay District

NMCOG – Northern Middlesex Council of Governments

OSD – Open Space Development

SHI – Subsidized Housing Inventory

ZBA – Zoning Board of Appeals