

FINAL DRAFT

Town of Dunstable

Housing Production Plan

2016-2020



February 2016

Prepared by

Northern Middlesex Council of Governments
40 Church Street, Suite 200
Lowell, MA 01852



Northern Middlesex Council of Governments

March 2, 2016

Chrystal Kornegay, Undersecretary
Massachusetts Department of Housing and Community Development
100 Cambridge Street, Suite 300
Boston, MA 02114

A Multi-Disciplinary
Regional Planning
Agency Serving:

Re: Dunstable Housing Production Plan (HPP)

Billerica
Chelmsford
Dracut
Dunstable
Lowell
Pepperell
Tewksbury
Tyngsborough
Westford

Dear Undersecretary Kornegay,

The Northern Middlesex Council of Governments (NMCOG) worked closely with the Dunstable Affordable Housing Committee to develop the enclosed *Town of Dunstable Housing Production Plan for 2016-2020*, which summarizes the current housing market in the community and outlines a five-year plan for increasing the number of residential units, including its affordable housing stock. At their meeting on February 2, 2016, the Dunstable Affordable Housing Committee approved the HPP and referred it to the Board of Selectmen and Planning Board for their adoption. The document was adopted unanimously by the Board of Selectmen and Planning Board at a joint meeting on February 25, 2016, as documented in the attached letters. This broad support reflects the Town's willingness to work in partnership with your office and the private sector to increase the availability of market-rate and affordable housing in Dunstable.

Philippe Thibault
Chair

Beverly A. Woods
Executive Director

The HPP addresses the requirements outlined under Chapter 40B of the Massachusetts General Law, as well as the 2008 program regulations developed by your office. This document is consistent with the Commonwealth's Sustainable Development Principles and establishes goals and strategies that reflect Dunstable's specific community characteristics, as reflected in their approved planning documents. Once approved by DHCD, this HPP will serve as a guide for the Town's housing program for the next five years.

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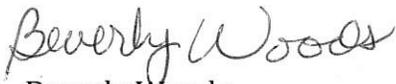
FAX: (978) 454-8023

www.nmcog.org

In developing the Dunstable HPP, the Dunstable Affordable Housing Committee was able to identify five (5) privately-owned and six (6) publically owned potential development sites that could generate 75-135 new housing units. In addition, the Dunstable Affordable Housing Committee has issued a Request for Proposals (RFP) for a Housing Feasibility Study related to a potential development on Pleasant Street in the Mixed Use District. These efforts reflect how seriously the Town of Dunstable is taking its responsibilities in developing affordable housing for the community.

If you have any questions or require any additional information, do not hesitate to contact Jay Donovan, Assistant Director, directly at (978) 454-8021 ext. 116 or at jdonovan@nmcog.org.

Sincerely,



Beverly Woods
Executive Director

cc: Tracey Hutton, Town Administrator
Dunstable Board of Selectmen
Dunstable Planning Board
Dunstable Affordable Housing Committee
NMCOG Councilors
Philip DeMartino, DHCD



OFFICE OF THE
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February 26, 2016

Chrystal Kornegay, Undersecretary
Massachusetts Department of Housing and Community Development
100 Cambridge Street, Suite 300
Boston, MA 02114

Dear Undersecretary Kornegay,

The Dunstable Board of Selectmen formally adopted the "*Dunstable Housing Production Plan for 2016-2020*" by a vote of 3-0 at its joint meeting with the Planning Board on February 25, 2016. The Town of Dunstable, through its Affordable Housing Committee, worked with the Northern Middlesex Council of Governments (NMCOG) for more than a year in completing this document.

We appreciate the opportunity to participate in this process and look forward to implementing the HPP over the next five years. The development of this document would not have been possible without the availability of Planning Assistance Towards Housing (PATH) and District Local Technical Assistance (DLTA) funds from your office.

If you have any questions or need any additional information, please feel free to contact Tracey Hutton, Town Administrator, at (978) 649-4514 extension 224.

Sincerely,

Ken Leva
Chairman

cc: Tracey Hutton, Town Administrator
Dunstable Planning Board
Dunstable Affordable Housing Committee
Beverly Woods, NMCOG
Phil DeMartino, DHCD



OFFICE OF THE

PLANNING BOARD

TOWN HALL, 511 MAIN STREET

DUNSTABLE, MA 01827-1313

February 25, 2016

Chrystal Kornegay, Undersecretary
Massachusetts Department of Housing and Community Development
100 Cambridge Street, Suite 300
Boston, MA 02114

Dear Undersecretary Kornegay,

The Dunstable Planning Board formally adopted the "*Dunstable Housing Production Plan for 2016-2020*" by a vote of 4-0 at a joint meeting with the Dunstable Board of Selectmen on February 25, 2016. The Dunstable Affordable Housing Committee worked closely with the Northern Middlesex Council of Governments (NMCOG) for the past year in completing this document.

We appreciate the opportunity to participate in this process and look forward to addressing our overall housing needs over the next five years. The development of this document would not have been possible without the availability of Planning Assistance Towards Housing (PATH) and District Local Technical Assistance (DLTA) funds, which play a vital role in the production of affordable housing units. We look forward to incorporating this document within our Master Plan Update this coming year.

If you have any questions or need any additional information, please feel free to contact the Planning Board at (978) 649-4514 extension 230.

Sincerely,

Joseph Vlcek
Chairman

cc: Tracey Hutton, Town Administrator
Dunstable Board of Selectmen
Dunstable Affordable Housing Committee
Beverly Woods, NMCOG
Phil DeMartino, DHCD

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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 that met the Chapter 40B Comprehensive Permit requirements for affordable housing production in Massachusetts. Through funding provided by the Department of Housing and Community Development (DHCD) under the Planning Assistance Towards Housing (PATH) and the District Local Technical Assistance (DLTA) programs, NMCOG staff worked closely with the Dunstable Affordable Housing Committee over the past year to complete this document. Building upon the previous work related to the *Greater Lowell Regional Strategic Plan*, NMCOG staff made a joint presentation to the Dunstable Board of Selectmen and Planning Board on the importance of this document to housing production in Dunstable. The *Dunstable Housing Production Plan for 2016-2020* 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, to produce more affordable housing for residents.

The *Dunstable Housing Production Plan for 2016-2020* utilizes population and household projections prepared by the Massachusetts Department of Transportation (MassDOT) with input from NMCOG. MassDOT developed these population and household projections for the Greater Lowell region from 2020 through 2040. These projections were based upon a statewide model that assigns a specific share of population to each Metropolitan Planning Organization (MPO) region and then to the individual communities. NMCOG provided comments on the draft projections and the final projections were adjusted accordingly by MassDOT.

A. Comprehensive Needs Assessment

Dunstable residents have a range of housing needs based upon household size, income, household type and age. The following summarizes the primary findings from the Comprehensive Needs Assessment section:

Population and Households

- Between 2000 and 2010, Dunstable's population grew by 12.4% resulting in a population of 3,179 in 2010. The Town's population represents 1.1% of the total population for the Greater Lowell region.
- During the same time period, Dunstable's households increased by 15.2%. Between 2010 and 2020, households are projected to increase by 19.6%. The growth rate will decrease to 13.8% between 2020 and 2030 and then to 10% between 2030 and 2040.
- By 2040 Dunstable's population is expected to reach 3,652 residents living in 1,590 households.

- In 2010, more than eighty-three percent (83.5%) of Dunstable’s households were family households, with two-person family households the most prevalent (40.1%) of total family households.
- Dunstable’s population is aging. Residents aged 60 and above are projected to increase by 42.2% from 2020 to 2040. Currently, there are no available enrollment projections for the Groton-Dunstable Regional School District.

Income

- According to the American Community Survey, median household income in Dunstable increased by 8.9% between 2005-2009 and 2009-2013, which is slightly higher than the income increases experienced in the surrounding communities and the region. However, when adjusted for inflation, the median household income in Dunstable decreased by .1%.
- In contrast, when adjusted for inflation, median family and per capita incomes in Dunstable increased by 6% and 11% respectively. These trends differ with the Greater Lowell region, Massachusetts and the United States, which all experienced declines in family and per capita income growth.
- More than 59% of households earn \$ 100,000 or more, which represents the largest income earning category in Dunstable, according to the American Community Survey.
- In 2009-2013, 40 residents, or 1.2% of the town's population, were living in poverty. Less than a quarter of those living in poverty were between the ages of 18 and 64 (22.5%), 25% were youth under the age of 18, and 52.5% were senior citizens aged 65 and older.

Housing Production, Sales and Costs

- The majority of housing units in Dunstable are single-family, detached homes, which make up 97% of the housing stock. About 94% of all housing units are owner-occupied.
- From 2004 to 2013, 164 building permits were issued for 164 residential units. The number of residential building permits issued was highest in 2005 and lowest in 2012. Residential sales peaked in 2014, with 46 houses sold, and were lowest in 2009 with just 21 residential units sold.
- About 28% of owner-occupied households in Dunstable were considered moderately burdened by their housing costs, paying more than 30% of their income on housing costs. Only 22% of all renters were considered moderately burdened by their rental costs.

B. Addressing Local and State Affordability Goals for Housing Production

In order to address the housing needs in Dunstable the following goals were developed by the Affordable Housing Committee. These goals are explained in Section II of the Plan:

1. Provide a variety of housing opportunities that serve all segments of the community, especially those below 80% of the area median income.

2. Maintain the rural, residential and historic character of the town through housing development.
3. Create diverse rental units, in terms of types of units (duplexes vs. multi-family) and number of bedrooms (three or more), for Dunstable residents.
4. Support the creation of workforce¹ housing units and broaden the range of potential home buyers and tenants.
5. Develop rental and ownership options for senior citizens, disabled residents and veterans that allow them to live independently.
6. Encourage new housing development consistent with community character and the identified needs.
7. Update the zoning bylaws, development review processes and permitting policies so they are clear and consistent.
8. 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.
9. Ensure that affordable housing development in Dunstable adheres to the Commonwealth's Sustainable Development Principles (see *Figure 8 on page 49*).
10. 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.

C. Strategies to Address Housing Needs and Increase Production

In order to implement the goals identified previously, strategies to address the housing needs of the community have been developed. These strategies are designed to increase and improve housing opportunities in Dunstable, particularly subsidized housing. The strategies are summarized below and in Section II.

Maintain Existing Housing and Expand Housing Opportunities

1. Upon the development of affordable housing units, be proactive in monitoring and maintaining them.
2. Develop more affordable rental housing (less than 30% of annual income) with the increased availability of 3- and 4-bedroom units.
3. Encourage re-use or redevelopment of underutilized property.
4. Document the specific needs of Dunstable veterans and construct affordable veterans housing units that meet those needs. Organizations like the [Veterans Northeast Outreach Center](#) and the local Veteran's agent can be consulted for housing assistance.
5. Consider Chapter 61 properties as potential affordable housing opportunities in the future.

¹ 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/>

6. Promote inclusion of affordable housing development under the Open Space Development Bylaw.
7. Incorporate the Housing Production Plan into future updates to the Dunstable Master Plan.
8. Work with State agencies and other stakeholders to develop group homes to provide supported, supervised living arrangements for citizens with mental and physical disabilities.
9. Utilize the Dunstable Affordable Housing Committee to implement the DHCD-approved Housing Production Plan.

Policies, Programs and Services

1. Evaluate and revise existing development regulations and guidelines for fairness and efficiency through the development of an Affordable Housing Permitting Guide to assist applicants in navigating the review process.
2. Working in conjunction with the Planning Board, Board of Selectmen, Zoning Board of Appeals and other town committees and boards, build upon the approved zoning changes so as to provide more affordable housing opportunities, such as through special permits for multi-family units, accessory apartments, assisted living facilities, and retirement communities.
3. Develop an Inclusionary Housing Bylaw to encourage development of new housing that is affordable to low and moderate-income households. Model Inclusionary Housing Bylaws can be found at: http://www.mass.gov/envir/smart_growth_toolkit/bylaws/IZ-Bylaw.pdf.
4. Utilize available Community Preservation Funds to support affordable housing development with a focus on the following programs and services:
 - Community education regarding affordable housing programs;
 - First-time home buyer's assistance program;
 - Rental assistance;
 - Renovation and sale of properties as affordable unit(s) from town tax lien properties acquired;
 - Purchase of property for use as an affordable housing development;
 - Provide betterment to donated buildings and/or land for affordable housing; and
 - Partnerships with private developers and public agencies for affordable housing initiatives that address the housing needs of the community.
5. Support legislative and/or regulatory reforms at the state level that recognize the efforts of communities like Dunstable to proactively provide "workforce housing" to serve households at 80-120% of the area median income (AMI), in addition to current efforts supporting households earning below 80% of the AMI.
6. Adopt local selection preferences that are consistent with DHCD Affirmative Fair Housing Marketing Plan (AFHMP) Guidelines and all applicable/ State and Federal laws/

regulations. The project will justify the extent of the local preference (the percentage of units proposed to be set aside for local preference), but in no event will a local preference exceed 70% of the (affordable) units in a project.

- Allowable Preference Categories

(1) Current residents: A household in which one or more members is living in the city or town at the time of application. Documentation of residency should be provided, such as rent receipts, utility bills, street listing or voter registration listing.

(2) Municipal Employees: Employees of the municipality, such as teachers, janitors, firefighters, police officers, librarians, or town hall employees.

(3) Employees of Local Businesses: Employees of businesses located in the municipality.

(4) Households with children attending the locality's schools, such as METCO students.

Education

1. Provide affordable housing training and educational opportunities to local Board and Committee members and staff, including the Affordable Housing Committee. These training opportunities could include updates on current policies to support affordable housing (i.e., the Comprehensive Permit Guidelines) and any revisions to state law or regional opportunities. This will allow boards and committees to provide guidance to the development community so as to improve the quality of proposals and result in a more expedited permitting process.
2. Increase public awareness of and support for affordable housing through increased outreach and public education.

Funding

1. Pursue the purchase of units and provide a subsidized buy-down on the purchase price to qualified first-time homebuyers.
2. Develop local partnerships with developers to utilize the State's Local Initiative Program (LIP) as a means to develop "friendly 40B" development projects.
3. Research federal and state grant opportunities for the enhancement of affordable housing including: HUD's Housing for the Elderly (Section 202) Program, [Community Economic Development Assistance Corporation](#) (CEDAC) and [Neighborworks Capital](#) (NWC).

Regional Coordination

1. Participate in a Regional Housing Committee to create a Regional Housing Plan for the Greater Lowell region.
2. Work with non-profit entities, such as the [Common Ground Development Corporation](#), a subsidiary of Community Teamwork, Inc., and the Coalition for a Better Acre to develop and manage affordable housing projects.

3. Collaborate with other communities to promote First-Time Homebuyer Program opportunities in the region and State to make existing homes more affordable.
4. Research and promote Foreclosure Assistance Programs through the State's Emergency Homeowners Loan Program (EHLP) or Community Teamwork, Inc. to help homeowners avoid foreclosure and maintain strong residential neighborhoods.

D. Housing Production Plan Implementation Requirements

Section III of the Housing Production Plan describes the characteristics preferred for affordable housing in Dunstable, the zoning changes that would be needed to be made in order to generate more affordable housing and the specific locations in the community that have been identified as potential subsidized housing sites.

To meet the State's requirements for developing a Housing Production Plan, the Town identified private and public parcels with the potential for future affordable housing development. Five (5) privately-owned and six (6) publically-owned sites were identified through this process. It is anticipated that between 75 and 135 new housing units could be developed on the identified sites. The list of potential housing sites will be utilized as a guide in implementing the Housing Production Plan.

Introduction

A. Overview of Housing Production Plan

The development of housing that is accessible and affordable to people with a range of incomes, household characteristics, and demographic qualities is critical to successful and sustainable community planning. The Massachusetts Comprehensive Permit Law (Chapter 774 of the Acts of 1969, a.k.a. Chapter 40B of the Massachusetts General Laws), enacted in 1969, 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” (DHCD 2009). While many residents understand the need for more affordable housing options, housing developments proposed vis-à-vis the Comprehensive Permitting process are often controversial.

The development and approval of a local Housing Production Plan (HPP) is an integral component of achieving safe harbor status from Comprehensive Permit/Chapter 40B proposals in Massachusetts. The Massachusetts Department of Housing and Community Development (DHCD) defines a Housing Production Plan (HPP) as:

“A community's proactive strategy for planning and developing affordable housing by: creating a strategy to enable it to meet its affordable housing needs in a manner consistent with the Chapter 40B statute and regulations; and producing housing units in accordance with the HPP.”

To qualify for approval from DHCD, an HPP must contain three main components: a Comprehensive Needs Assessment, Affordable Housing Goals and Strategies, and Implementation Strategies. The purpose of the Comprehensive Needs Assessment section is to determine the community context, which relies on demographic, community development (zoning and infrastructure), and economic data to assess the extent to which housing needs match the existing housing stock in the community.

The Affordable Housing Goals and Strategies component determines the appropriate housing mix for the community, 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 recent revisions to the Chapter 40B requirements, the minimum annual affordable housing production goal is greater or equal to 0.5% of the year-round housing stock.

Finally, the purpose of the Implementation Strategies section of the plan is to identify potential growth areas and zoning districts, target specific sites for the production of affordable housing,

assess municipally-owned land to develop into mixed-income housing, and identify regional housing development collaboration opportunities.

Once approved by DHCD, an HPP is valid for five years. Additionally, communities may apply to have their HPP certified by DHCD. 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 housing units by at least 0.5%. Certification lasts for one year if the community has increased its Subsidized Housing Inventory (SHI) units by 0.5%, and two years if it has increased the number of SHI units by 1.0%. According to Chapter 40B, once a plan has been certified, the local community has greater power in controlling new residential development because a decision by the Zoning Board of Appeals to deny a Comprehensive Permit application will be considered “consistent with local need,” meaning that the ZBA’s decision would be upheld by DHCD’s Housing Appeals Committee (HAC).

B. Defining Affordable Housing

There are several definitions of affordable housing in the United States depending on whether one utilizes Federal or State criteria. 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. For rental units this includes gross rent plus utilities, whereas for ownership units this includes the cost of mortgage, property taxes, and insurance. According to HUD’s affordability criteria, when a household pays more than 30% of its income on housing-related costs, it is considered burdened by housing, and households spending 50% or more of their income on housing are considered severely burdened.

Another measure of housing affordability is based on Area Median Income (AMI). AMI calculations are the most popular way of prioritizing households for affordable housing opportunities. According to HUD, extremely low income characterizes households earning 30% or less of AMI; very low income households earn between 31% and 50% of AMI; low income households earn between 51% and 80% of AMI; and moderate income households earn between 81% and 100% of AMI.

At the state level, DHCD 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% AMI. Generally speaking, programs that subsidize rental units target households earning within 50% or 60% AMI, and first-time homebuyer programs apply income limits of up to 80% AMI.

Under Chapter 40B, housing is considered “affordable” if it meets the following criteria:

1. The unit(s) must be part of a subsidized development built by a public agency, non-profit, or limited dividend corporation;
2. At least 25% of the units in the development must be income-restricted to households earning \leq 80% AMI and have rent/sale prices restricted to affordable levels (determined

by AMI). Affordability restrictions must run in perpetuity unless there is demonstrated justification for a shorter term;

3. The development must be subject to a regulatory agreement and monitored by a public agency or non-profit organization; and
4. Project sponsors must meet affirmative marketing requirements.

If Dunstable has achieved certification within 15 days of the opening of the local hearing for the Comprehensive Permit, the ZBA shall provide written notice to the Applicant, with a copy to DHCD, that it considers that a denial of the permit or the imposition of conditions or requirements would be consistent with local needs, the grounds that it believes has been met, and the factual basis for that position, including any necessary supportive documentation.

If the Applicant wishes to challenge the ZBA's assertion, it must do so by providing written notice to the Department, with a copy to the Board, within 15 days of its receipt of the ZBA's notice, including any documentation to support its position. DHCD shall thereupon review the materials provided by both parties and issue a decision within 30 days of its receipt of all materials. The ZBA shall have the burden of proving satisfaction of the grounds for asserting that a denial or approval with conditions would be consistent with local needs, provided, however, that any failure of the DHCD to issue a timely decision shall be deemed a determination in favor of the municipality. This procedure shall toll the requirement to terminate the hearing within 180 days.

C. Data Sources and Definitions

The *Dunstable Housing Production Plan* relies on a variety of data sources from 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), Massachusetts Department of Transportation (MassDOT), the Department of Housing and Community Development (DHCD), and NMCOG. The two main survey tools used are the U.S. 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. Census and the ACS is that the Census samples every individual in a community, whereas the ACS samples a subset of the community. This is because the Census strives to provide counts of people for the purpose of Congressional apportionment, whereas the ACS is designed to measure social and economic characteristics of the U.S. population, which can be achieved through estimates.

These differences in sampling methodology mean that some values, such as the number of households in a community, are reported differently in the ACS versus the Census. More accurate household numbers are available through the Census, because it samples everyone in a community. However, ACS numbers still hold value because the survey asks a wider variety of

questions. Information on household income, for instance, is only available in the ACS, and was not included as part of the 2010 U.S. Census.

Another key difference between the Census and the ACS is that the Census collects data once every ten years, whereas ACS data are collected continuously. Typically, data from the Census are collected between March and August in a single year, whereas data from the ACS are collected each month and reflect conditions throughout the year.

Furthermore, there are differences in questions and terminology across the Census and the ACS. For example, the Census Bureau introduced a new set of disability questions in the 2008 ACS Questionnaire, which makes comparisons of disability data from 2008 or later with prior years quite 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. Comparison across data sources is avoided whenever possible. When comparison is unavoidable, the HPP will describe any caution that should be taken.

In addition to these various data sources, it is important to clarify the definitions for terms, such as *housing unit*, *household* and *family*. The U.S. Census Bureau utilizes the following definitions:

Housing Unit – A house, an apartment, a mobile home or trailer, a group of rooms, or a single room occupied as separate living quarters, 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. In general the term *housing units* refers to all the residential structures in the community.

Household – A household includes all the people who occupy a housing unit as their usual place of residence. The term “households” includes all family or nonfamily households.

Family – A group of two or more people who reside together and who are related by birth, marriage or adoption.

For other definitions, consult the U.S. Census Bureau web page at www.census.gov.

The *Dunstable Housing Production Plan* utilizes population and household projections prepared by the Massachusetts Department of Transport (MassDOT) with input from NMCOG. The population projections were developed for the Greater Lowell region from 2020 through 2040, while the household projections have only been developed through 2035 at this time. (Note: Once these are updated through 2040, they will be included within this document.) 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 individual communities. NMCOG staff provided comments on the draft projections and the final projections were adjusted accordingly.

I. Comprehensive Needs Assessment

The Comprehensive Needs Assessment includes a demographic analysis and a housing stock analysis. The demographic analysis involves a discussion of population, household types, age cohorts, school enrollment, race, ethnicity, disabled community and income. The housing stock analysis provides an analysis of unit types, tenure, new residential development and housing market conditions. This section also examines housing affordability, gaps between existing housing needs and the current supply, and affordable housing efforts in Dunstable.

A. Demographic Analysis

The Demographic Analysis provides an overview of the demographic changes that have occurred in Dunstable since the publication of the *Dunstable Planned Production Plan for Affordable Housing* in 2005. Using data from the U.S. Census on household, age, race, ethnicity, disability, and income, this section analyzes past, current and future demographics in Dunstable in order to envision future population changes and to inform the Housing Needs section of this plan.

1. Population

According to the 2010 U.S. Census, Dunstable had a population of 3,179 residents, which represented 1.1% of the Greater Lowell region's population. With a land area of 16.74 square miles, the population density is approximately 190 persons per square mile. Over the last few decades, the population in Dunstable, as well as in the Greater Lowell region as a whole, has steadily increased. 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 or an average of 14% per decade. In contrast, Dunstable's population increased steadily between 1960 and 2010, from 824 to 3,179 (285.8%) with a growth rate of 12.4% between 2000 and 2010 (see Table 1, next page).

Dunstable remains the smallest town in the Greater Lowell region. Its overall proportion of the region's population has ranged between 1% in 2000 to 1.1% in 2010. Even the projected population for 2040 doesn't show more than a 1.2% share of the region's population for Dunstable. The largest growth within the Greater Lowell region has occurred in the outlying suburbs of Pepperell, Tyngsborough and Westford, while the older suburbs of Billerica, Chelmsford and Tewksbury have shown a decline in their growth rate relative to the region as a whole. The Town of Dunstable shares many similarities with Pepperell and Tyngsborough, even though it is much smaller.

Table 1: Actual and Projected Population: 2000 - 2040

| Year | Dunstable | Growth Rates | Greater Lowell Region | Regional Growth Rate | Dunstable as a Percent of Region |
|------|-----------|--------------|-----------------------|----------------------|----------------------------------|
| 2000 | 2,829 | 26.5% | 281,225 | 6.7% | 1.0 |
| 2010 | 3,179 | 12.4% | 286,901 | 2.0% | 1.1 |
| 2020 | 3,256 | 2.4% | 291,101 | 1.5% | 1.1 |
| 2030 | 3,397 | 4.3% | 295,370 | 1.5% | 1.2 |
| 2040 | 3,652 | 7.5% | 306,913 | 3.9% | 1.2 |

Source: 2000 and 2010 US Census; Projections developed by Mass DOT in consultation with NMCOG

Population projections for the Town of Dunstable, as outlined in Table 1 above, reflect a slightly higher future growth rate for the town compared to the region as a whole. Between 1990 and 2000, Dunstable experienced a growth rate of 26.5%, while this growth rate decreased to 12.4% between 2000 and 2010. Between 2010 and 2020 Dunstable will experience a growth rate of 2.4%, which is anticipated to increase to 4.3% and 7.5% between 2020 and 2030 and 2030 and 2040 respectively, reaching a total projected population of 3,652 in 2040. The projections indicate that Dunstable’s population will only comprise 1.2% of the Greater Lowell region’s total population.

2. Households and Household Types

According to the U.S. Census Bureau, a household consists of all the people who occupy a housing unit (e.g. house, apartment, single room). A household includes the related family members and all the unrelated people, if any, such as lodgers, or foster children who share the housing unit. A person living alone in a housing unit, or a group of unrelated people sharing a housing unit, is also counted as a household. The household count excludes group quarters.

Household growth rates in both Dunstable and the Greater Lowell region have experienced a slow-down since the turn of the century. However, Dunstable’s slowdown was not as dramatic as the region’s. In 2000 there were 923 households in Dunstable and by 2010 an additional 140 households (15.2%) had been added in the town. The region’s household growth rate decreased from 10.2% in 2000 to 4.7% in 2010. This slowdown was due principally to the housing and economic downturn in 2007-2008.

Household growth in Dunstable is expected to decline from 15.2% in 2010 to 10% (1,590 households) in 2040 (see Table 2). This is dissimilar from the regional household growth rates, which are expected to increase from 4.7% in 2010 to 5.1% over the same timeframe. Over the next twenty- five years, Dunstable’s households are expected to comprise only 1.3% of the region’s total households. Yet, Dunstable’s household growth rate after 2020 will continue to outstrip the region’s household growth rate by two times leveling off at 10% in 2040. Outlined in Table 2 on the next page are the current household projections developed by MassDOT with

input from NMCOG. Note: The Percent Change columns begin with 1990 to 2000 and then continues with 2000 to 2010, 2010 to 2020, 2020 to 2030 and 2030 to 2040.

Table 2: Total Number of Households (2000-2040)

| Year | Dunstable | Percent Change Town | Total Number Greater Lowell | Percent Change Region | Dunstable Households as a Percent of the Region |
|------|-----------|---------------------|-----------------------------|-----------------------|---|
| 2000 | 923 | 33.4 | 99,342 | 10.2 | 0.9 |
| 2010 | 1,063 | 15.2 | 104,022 | 4.7 | 1.0 |
| 2020 | 1,271 | 19.6 | 113,223 | 8.8 | 1.1 |
| 2030 | 1,446 | 13.8 | 119,635 | 5.7 | 1.2 |
| 2040 | 1,590 | 10.0 | 125,795 | 5.1 | 1.3 |

Source: 2000 and 2010 U.S. Census; Projections developed by Mass DOT in consultation with NMCOG

Household types are divided into two categories: family and nonfamily. In a family household, those who occupy a housing unit are related by birth, marriage or adoption, whereas in a non-family household, those who occupy a housing unit are not related (e.g. roommates). According to the 2010 U.S. Census, more than 83% of the 1,063 households in Dunstable are family households, as outlined in Table 3 below.

Table 3: Household Types (2000 and 2010)

| Household Type | 2000 | | 2010 | |
|----------------------|------------|--------------|--------------|--------------|
| | Number | Percentage | Number | Percentage |
| Family households | 798 | 86.5 | 888 | 83.5 |
| Nonfamily households | 125 | 13.5 | 175 | 16.5 |
| Total | 923 | 100.0 | 1,063 | 100.0 |

Source: 2000 and 2010 U.S. Census

In 2000 family households (798) comprised 86.5% of all households, while non-family households (125) comprised 13.5% of all households. In 2010 the proportion of family households decreased to 83.5% and non-family households increased to 16.5%, reflecting a 3% decrease in the share of family households.

a. Age Distribution

The U.S. Census also provides an indication of the age distribution in Dunstable's households. In 2000 the majority of residents in both family and non-family households were between 35 and 64 years of age. Nearly 80% of residents in family households and more than 62% of residents in nonfamily households were in this age cohort, as outlined in Table 4 on the next page. In 2010 the proportion of household residents 35-64 years of age increased from 79.4% to 82.8%,

while those 34 years of age and under decreased from 10.9% to 2.7%. Family and non-family households aged 65 years and older experienced slight increases, which reflects the aging population in Dunstable.

Table 4: Head of Household Age Distribution (2000 and 2010)

| Household Type | 2000 | | 2010 | |
|-----------------------------|--------|------------|--------|------------|
| | Number | Percentage | Number | Percentage |
| Family households | | | | |
| 34 Years and Under | 87 | 10.9 | 24 | 2.7 |
| 35-64 Years Old | 634 | 79.4 | 735 | 82.8 |
| 65 Years and Older | 77 | 9.6 | 129 | 14.5 |
| Total | 798 | 99.9 | 888 | 100.0 |
| Nonfamily households | | | | |
| 34 Years and Under | 11 | 8.8 | 14 | 8.0 |
| 35-64 Years Old | 78 | 62.4 | 110 | 62.9 |
| 65 Years and Older | 36 | 28.8 | 51 | 29.1 |
| Total | 125 | 100.0 | 175 | 100.0 |

Source: 2000 and 2010 U.S. Census

b. Household Size

Another important factor when assessing the housing needs of a community is household size. According to the U.S. Census, the average household size in Dunstable decreased from 3.07 persons per household in 2000 to 2.99 persons per household in 2010. In the Greater Lowell region, the average household size in 2000 was 2.77 persons per household and 2.76 persons per household in 2010. In general, the average household size in Dunstable has decreased more rapidly than the region, yet, as of 2010, still remains slightly larger.

The U.S. Census data generally shows that the size of Dunstable's family households tends to be four persons or less. Family households typically contain two to four people, with two-person family households the most prevalent in the town. Only 14.1% of family households contain five or more people (Table 5, on the next page).

Table 5: Household Size (2009-2013)

| Household Type | Household Size | | | | | | | Total |
|-----------------------------|----------------|-------------|-------------|-------------|------------|------------|------------|--------------|
| | 1-Person | 2-Person | 3-Person | 4-Person | 5-Person | 6-Person | 7 + Person | |
| Family Household | 0 | 367 | 144 | 274 | 109 | 16 | 5 | 915 |
| Percentage | 0.0 | 40.1 | 15.7 | 29.9 | 11.9 | 1.7 | 0.5 | 80.7 |
| Non-Family Household | 189 | 30 | 0 | 0 | 0 | 0 | 0 | 219 |
| Percentage | 86.3 | 13.7 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 19.3 |
| Total | 189 | 397 | 144 | 274 | 109 | 16 | 45 | 1,134 |
| Percentage | 16.7 | 35.0 | 12.7 | 24.2 | 9.6 | 1.4 | 4.0 | 100.0 |

Source: 2009-2013 American Community Survey

Similarly, nonfamily households most often contain one or two people with single-person households most dominant (86.3%). Based on the American Community Survey data, there are no nonfamily households in Dunstable with more than two people.

c. Household Characteristics

Household characteristics can also be analyzed to provide insight into the diversity of the family unit. Data from the 2000 and 2010 U.S. Census show that Dunstable's households are becoming more diverse. While family households comprise a significant majority of all households, there has been a slight increase in the percentage of nonfamily households from 13.5% in 2000 to 16.5% in 2010. As outlined in Table 6 below, family households with their own children under 18 years of age decreased from 54.9% in 2000 to 50.1% in 2010. Married couples comprised 88.7% of all family households in 2000 and 87.2% in 2010.

Table 6: Household Characteristics (2000 and 2010)

| Household Type | 2000 | | 2010 | |
|--|------------|--------------|--------------|--------------|
| | Number | Percentage | Number | Percentage |
| Family Households | 798 | 86.5 | 888 | 83.5 |
| With own children under 18 years | 438 | 54.9 | 445 | 50.1 |
| Married - couple family | 708 | 88.7 | 774 | 87.2 |
| Male householder | 24 | 3.0 | 32 | 3.6 |
| Female householder | 66 | 8.3 | 82 | 9.2 |
| Nonfamily households | 125 | 13.5 | 175 | 16.5 |
| Householder living alone | 95 | 76.0 | 136 | 77.7 |
| Householders 65 and older living alone | 34 | 35.8 | 44 | 32.4 |
| Householder living with others | 30 | 24.0 | 39 | 22.3 |
| Total Households | 923 | 100.0 | 1,063 | 100.0 |

Source: 2000 and 2010 U.S. Census

The proportion of nonfamily households comprising people living alone has remained relatively consistent from 76% in 2000 to 77.7% in 2010. However, there has been a 40% increase in nonfamily households between 2000 and 2010, which may indicate an increase in the number of Dunstable residents who choose to live with roommates due to economic necessity or other personal reasons. These trends indicate single-person, single-parent families and married couples without children are increasing in Dunstable. This could be due to a variety of factors, including an aging population whose children have moved out of the home, increases in the divorce rate, or couples deciding to have children later in life.

3. Age Cohorts

In order to determine how best to meet future housing demand in Dunstable, it is important to examine the current age of the population, as well as projected aging trends over time.

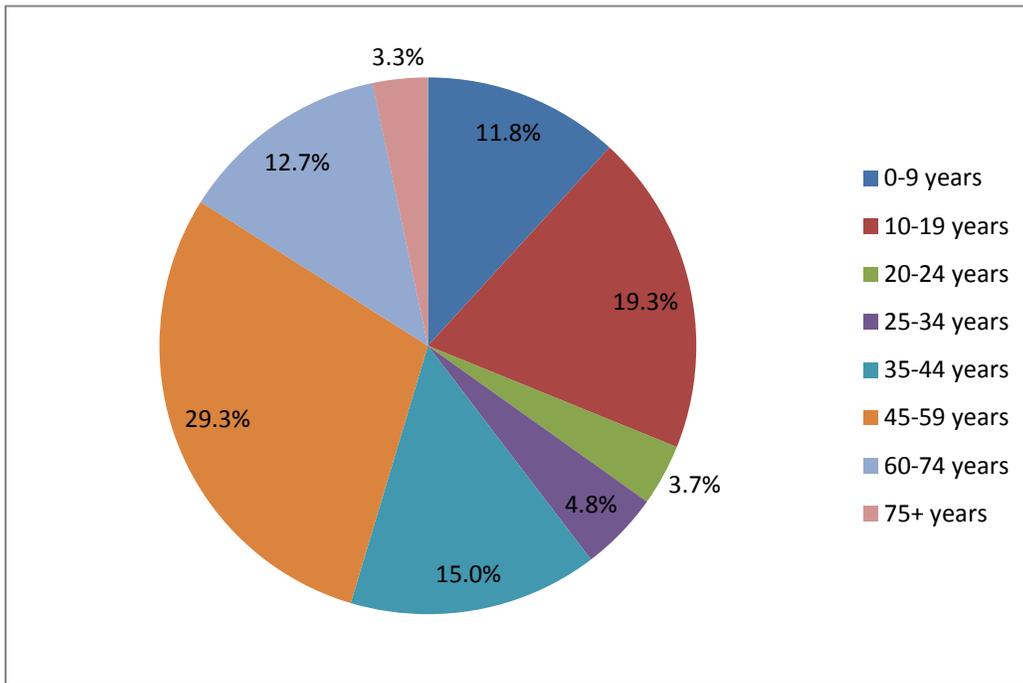
According to the U.S. Census, the median age in Dunstable increased from 37.3 years in 2000 to 42.9 years in 2010. This data also indicates that the majority of Dunstable residents in 2000 and 2010 were between the ages of 35 and 59, as outlined in Table 7 below. During this same time period, the 60-74 age group grew by 81.2% and the 75+ age group grew by 45.8%. However, those age cohorts experiencing declines included the 0-9 (-24.4%), 25-34 (-45.7%), and 35-44 (-21.7%) groups, as shown in Table 7 below and Figure 1 (pie chart form) on the next page.

Table 7: Age Distribution of Dunstable Residents (2000 and 2010)

| | 2000 | | 2010 | | Percent change 2000-2010 |
|-------------------------|--------------|--------------|--------------|--------------|-----------------------------|
| | Number | Percent | Number | Percent | |
| 0-9 years | 496 | 17.5 | 375 | 11.8 | -24.4 |
| 10-19 years | 429 | 15.2 | 615 | 19.3 | 43.4 |
| 20-24 years | 81 | 2.9 | 118 | 3.7 | 45.7 |
| 25-34 years | 280 | 9.9 | 152 | 4.8 | -45.7 |
| 35-44 years | 609 | 21.5 | 477 | 15.0 | -21.7 |
| 45-59 years | 639 | 22.6 | 933 | 29.3 | 46.0 |
| 60-74 years | 223 | 7.9 | 404 | 12.7 | 81.2 |
| 75+ years | 72 | 2.5 | 105 | 3.3 | 45.8 |
| Total Population | 2,829 | 100.0 | 3,179 | 100.0 | 12.4 |

Sources: 2000 and 2010 U.S. Census;

Figure 1: Age Distribution of Dunstable Residents (2010)



Source: 2010 U.S. Census

To understand future population trends, MassDOT, with input from NMCOG, developed population projections for 2020 to 2040. Utilizing these projections, it is estimated that Dunstable’s total population will increase by 14.9% between 2010 and 2040, as outlined in Table 8 below. To determine the projected age distribution of Dunstable’s future residents, NMCOG utilized available data from Metro Future age cohort breakdowns. The age cohort breakdowns have been applied to the MassDOT projections so that the numbers are consistent. This data provides a useful indication of the future age distribution of Dunstable residents.

Table 8: Projected Age Distribution of Dunstable Residents (2020-2040)

| Age Groups | 2020 | | 2030 | | 2040 | | Percent Change 2010 - 2040 |
|-----------------------------|--------------|--------------|--------------|--------------|--------------|--------------|----------------------------------|
| | Number | Percent | Number | Percent | Number | Percent | |
| 0-9 years | 394 | 12.1 | 431 | 12.7 | 460 | 12.6 | 22.7 |
| 10-19 years | 510 | 15.7 | 533 | 15.7 | 573 | 15.7 | -6.8 |
| 20-24 years | 120 | 3.7 | 105 | 3.1 | 110 | 3.0 | -6.8 |
| 25-39 years | 477 | 14.6 | 506 | 14.9 | 533 | 14.6 | 76.5 |
| 40-59 years | 1,212 | 37.2 | 1,170 | 34.4 | 1,204 | 33.0 | -4.4 |
| 60-74 years | 491 | 15.1 | 577 | 17.0 | 644 | 17.6 | 59.4 |
| 75+ years | 52 | 1.6 | 75 | 2.2 | 128 | 3.5 | 21.9 |
| Total Population | 3,256 | 100.0 | 3,397 | 100.0 | 3,652 | 100.0 | 14.9 |

Source: Projections developed by MassDOT in consultation with NMCOG, utilizing MetroFuture age cohort breakouts.

The age groups that will increase the most are the 25-39 and the 60-75 age groups, which are expected to increase 76.5% and 59.4% respectively by 2040. These trends indicate that while the population in Dunstable is aging, there will be a need for starter homes is likely declining, while the need for elderly housing may be increasing. This increase is a logical consequence of an aging population in a society where most people, on average, will live into their eighties.¹ The expected population growth in Dunstable, especially the increase in the elderly population, has important implications for housing planning and development. In addition to a general need for more housing units, special attention will need to be paid to the housing needs of seniors and for housing stock that can adapt to the needs of an aging population. The *Dunstable Housing Production Plan* will consider these unique housing needs as it develops a framework for housing production in Dunstable for the next five years.

4. School Enrollments

School enrollment trends are a crucial component of Dunstable's town-wide growth and population trends. An analysis of school enrollment trends helps frame a discussion of the potential future impacts of population change on the school system and Town, and helps better plan for future local housing needs. The results of the analysis are useful in formulating an affordable housing strategy that is sensitive to these changes over time.

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 2,509 for the 2015-2016 school year, while the percentage of Dunstable students within the School District was 22% (561). Groton students represented 76% of the total enrollment, while the remaining 2% was comprised of students from other communities. The Groton Dunstable Regional School District is comprised of the following schools:

- d. **Groton-Dunstable High School** serves students in the ninth to twelfth grades and had a 97.2% graduation rate and 0.5% dropout rate in 2014-2015. The number of high school students has remained fairly steady from 866 students in 2010-2011 to 867 students in 2014-2015.
- e. **Groton Dunstable Regional Middle School** consists of two schools the North and South, and serves students in the fifth to eighth grades.
- f. 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. The **Boutwell Early Childhood Center** in Groton serves the pre-school or Early Childhood & Care (ECC) students.

¹ <http://www.ssa.gov/planners/lifeexpectancy.htm>

Outlined below are the enrollment figures for the Dunstable students in the Groton-Dunstable Regional School District for the past five years:

Table 9: Total Public School Enrollment (2010- 2014) ^[1]

| School | 2010-2011 | 2011-2012 | 2012-2013 | 2013-2014 | 2014-2015 |
|-------------------------|--------------|--------------|--------------|--------------|--------------|
| ECC | 77 | 60 | 58 | 57 | 52 |
| Elementary School (1-4) | 502 | 858 | 835 | 834 | 826 |
| Middle School (5-8) | 926 | 902 | 859 | 864 | 828 |
| High School (9-12) | 866 | 861 | 890 | 870 | 867 |
| Total Enrollment | 2,771 | 2,681 | 2,632 | 2,625 | 2,573 |

Source: Massachusetts Department of Elementary and Secondary Schools, 2015

Dunstable children 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).

5. Race and Ethnicity

By and large, Dunstable is a racially and linguistically homogenous community. In 2000, 97.5% of residents identified themselves as white, while 1.5% identified themselves as Asian and another .5% were part of the Hispanic and/or Latino community. The U.S. Census indicates that between 2000 and 2010 the white population in Dunstable increased by 9.9%, while the minority populations increased by 105.6% as outlined in Table 10 on the next page. Black or African American residents increased by 133.3%, while Asian and Hispanic/Latino residents increased by 127.9% and 193.3% respectively. In addition, the American Indian and Alaska Native population increased by 200% between 2000 and 2010. However, it must be recognized that such increases are coming from a low population base, which is why the percentages are considerably high. Even with these increases in minority populations, the white population still represented 95.3% of the total population in 2010. Although Dunstable remains primarily homogeneous, it is slowly transitioning to an increasingly diverse community.

^[1] ECC = Early Childhood & Care

Table 10: Racial and Ethnic Diversity of Residents (2000 and 2010)

| Racial/Ethnic Category | 2000 | | 2010 | | Percent Change |
|--|--------------|--------------|--------------|--------------|----------------|
| | Population | Percent | Population | Percent | 2000-2010 |
| White | 2,758 | 97.5 | 3,031 | 95.3 | 9.9 |
| Black or African American | 3 | 0.1 | 7 | 0.2 | 133.3 |
| American Indian and Alaska Native | 1 | 0.1 | 3 | 0.1 | 200.0 |
| Asian | 43 | 1.5 | 98 | 3.1 | 127.9 |
| Native Hawaiian and Other Pacific Islander | 1 | 0.1 | 4 | 0.1 | 300.0 |
| Some Other Race and Two or More Races | 24 | 0.8 | 36 | 1.1 | 50.0 |
| Total Population | 2,830 | 100.0 | 3,179 | 100.0 | 12.3 |
| Hispanic or Latino (All races) | 15 | 0.5 | 44 | 1.4 | 193.3 |

Source: 2000 and 2010 U.S. Census

6. Residents with Disabilities

Understanding the needs of disabled Dunstable residents is also a crucial aspect of planning for housing. Disability data for Dunstable is available in the 2000 U.S. Census, but no disability data was collected for the 2010 U.S. Census. Therefore, disability data in the 2009-2013 American Community Survey (ACS) is the most recent data. According to the U.S. Census Bureau, there was growing agreement after the 2000 U.S. Census that survey questions on disability did not coincide with recent disability models. An interagency group was formed to develop a new set of questions that were introduced in 2008. These questions categorize a disability as one having difficulty in one of the following: hearing, vision, cognition, walking or climbing stairs (ambulatory), self-care (difficulty bathing or dressing), and independent living (difficulty doing errands alone, such as visiting a doctor's office or shopping).

Because of the changes to the questions, the U.S. Census Bureau recommends that these results not be compared to the 2000 U.S. Census disability data. Therefore, this section focuses only on disability data available from the 2009-2013 ACS, which estimates that there were 169 disabled residents in Dunstable, of which 43.8% were between the ages of 65 and older, as outlined in Table 11 on the next page.

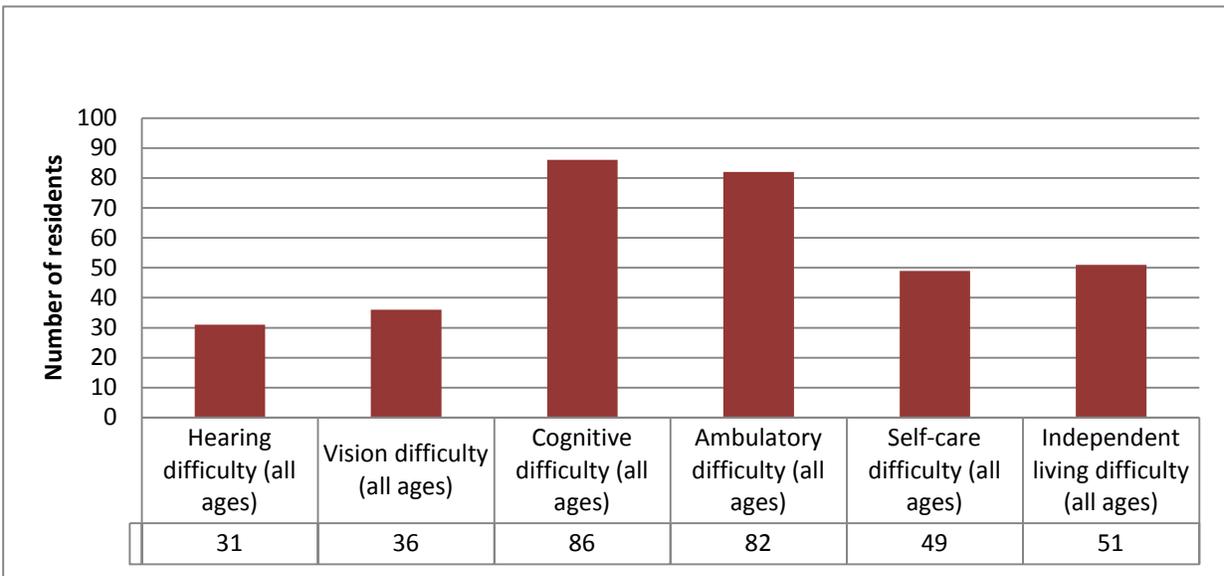
Table 11: Age Characteristics of the Disabled Community in Dunstable (2009-2013)

| Disability Status | Total Number | Percent of Total |
|---|--------------|------------------|
| Under 5 | 0 | 0.0 |
| 5-17 years old | 30 | 17.8 |
| 18-64 years old | 65 | 38.5 |
| 65+ years old | 74 | 43.8 |
| Total Number of Disabled Residents | 169 | 100.1 |

Source: 2009 - 2013 American Community Survey

Cognitive disability was the most common disability reported in the 2009-2013 ACS, which means that a person experienced serious difficulty understanding. The next most common disabilities are ambulatory, independent living, self-care, vision and hearing difficulty, as outlined in Figure 2 below.

Figure 2: Disabilities Reported for Dunstable Residents (2009-2013)



Source: U.S. Census Bureau, 2009-2013 American Community Survey

It is important to note that some residents experience more than one disability, which is why the values in Figure 2 are greater than the total number of disabled residents. This data is also based on a survey sample and is therefore subject to sampling variability, which can result in a degree of uncertainty.

Dunstable residents comprise approximately .5% of the reported disabled community in the Greater Lowell region. As shown on the next page in Table 12, this figure is much lower than the other communities in the Greater Lowell region.

Table 12: Characteristics of the Disabled Community in the Region (2009-2013)

| Age Characteristics | Billerica | Chelmsford | Dracut | Dunstable | Lowell | Pepperell | Tewksbury | Tyngsborough | Westford | Totals |
|---|-----------|------------|--------|-----------|--------|-----------|-----------|--------------|----------|--------|
| under 5 | 8 | 0 | 0 | 0 | 169 | 0 | 0 | 16 | 0 | 193 |
| 5 to 17 | 287 | 205 | 296 | 30 | 1,436 | 181 | 233 | 77 | 198 | 2,943 |
| 18 to 64 | 1,834 | 1,253 | 1,815 | 65 | 8,290 | 623 | 1,228 | 637 | 498 | 16,243 |
| 65 over | 1,589 | 1,582 | 3,732 | 74 | 4,089 | 310 | 1,382 | 465 | 572 | 13,795 |
| Percent Regional Disabled Population | 11.2 | 9.2 | 17.6 | .5 | 42.2 | 3.4 | 8.6 | 3.6 | 3.8 | 100.0 |
| Total | 3,718 | 3,040 | 5,843 | 169 | 13,984 | 1,114 | 2,843 | 1,195 | 1,268 | 33,174 |

Source: 2009-2013 American Community Survey

Disabled residents often have unique housing needs, both in terms of the physical design/accessibility of their homes and the cost relative to a fixed or limited income. For this reason, a comprehensive affordable housing plan should be sensitive to the specific needs of the disabled community and incorporate their issues into the goals and strategies for future affordable housing production. These issues will be addressed in the Affordable Housing Goals and Strategies and Housing Production Plan Implementation Requirements sections.

7. Household and Family Income

This section examines median household, family and per capita incomes in Dunstable, and compares Dunstable’s income distribution to HUD eligibility thresholds and U.S. poverty thresholds. By examining these values, we can better appreciate the proportion of Dunstable residents who may be in poverty or living on a restricted income.

a. Median Household Income

According to the U.S. Census Bureau, median household income is calculated based on the income of the householder and all other individuals 15 years old and over in the household. Over the past twenty years, Dunstable has seen a significant increase in its median household income, which far exceeds that of the Greater Lowell region as a whole. More recently, the median household income in Dunstable increased approximately 8.9% from \$109,333 in 2009 to \$119,022 in 2013, as outlined on the next page in Table 13.

Table 13: Median Household Income for Selected Geographies (2005-2009 and 2009-2013)

| Geographic Area | 2005-2009 | 2009-2013 | Percentage Increase | % Inflation Adjusted |
|---|-----------|-----------|---------------------|----------------------|
| Dunstable | \$109,333 | \$119,022 | 8.9 | -0.1 |
| Greater Lowell Region PMSA/Lowell-Billerica-Chelmsford, MA-NH NECTA | \$71,196 | \$74,451 | 4.6 | -4.1 |
| Massachusetts | \$64,496 | \$66,866 | 3.7 | -4.9 |
| United States | \$51,425 | \$53,046 | 3.2 | -5.4 |

Sources: 2005-2009 and 2009-2013 American Community Survey

The increase in Dunstable’s median household income is at the higher end of increases in the region, which as a whole experienced a 4.6% growth in median household income. In 2013 Dunstable’s median household income was estimated to be 99.8 % higher than the Greater Lowell region’s median household income. This percentage reflects a considerable increase from the 1999 figures that showed Dunstable’s median household income being only 48.8% higher than the median household income in the Greater Lowell region. The Commonwealth of Massachusetts experienced increases in median household income of 3.7% between 2009 and 2013, while the nation saw median household incomes increase by 3.2%.

It is important to adjust these values for inflation so an absolute comparison can be made. According to the Bureau of Labor Statistics (BLS) Inflation Rate Calculator, one dollar in 2009 has the same buying power as \$1.09 in 2013 dollars, which reflects an inflation rate of 9% between 2009 and 2013. 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. This value is confirmed by the Cumulative Inflation Rate Calculator on www.inflationdata.com , which indicates an inflation rate of 8.26% between June 2009 and June 2013.

When adjusted for inflation, Dunstable and the Greater Lowell region both experienced negative growth in terms of median household income, with incomes decreasing by 0.1% and 4.1% respectively. Massachusetts and the nation also decreased by 4.9% and 5.4% respectively. This indicates that growth in median household incomes has not kept pace with inflation.

b. Median Family Income

Median family income is calculated based on the income of the householder and all other individuals 15 years old and over in the household who are related. Median family income is often greater than median household income because a household can consist of single individuals, whereas family income always consists of two or more individuals. Over the past

twenty years, median family incomes have increased in Dunstable, the Greater Lowell region, Massachusetts and the United States.

Table 14: Median Family Income for Selected Geographies (2005-2009 and 2009-2013)

| Geographic Area | 2005-2009 | 2009-2013 | % Increase |
|---|-----------|-----------|------------|
| Dunstable | \$115,964 | \$133,942 | 15.5 |
| Greater Lowell Region PMSA/Lowell-Billerica-Chelmsford, MA-NH NECTA | \$85,081 | \$91,955 | 8.1 |
| Massachusetts | \$80,822 | \$84,900 | 5.0 |
| United States | \$62,363 | \$64,719 | 3.8 |

Source: 2005-2009 and 2009 - 2013 American Community Survey

As outlined in Table 14 above, Dunstable’s median family income increased from \$115,964 in 2005-2009 to \$133,942 in 2009-2013 – an increase of 15.5%. Median family incomes also increased across the region, state and nation, albeit not at the same level of growth experienced in Dunstable. When adjusted for inflation, Dunstable experienced 6% growth in median family income. In contrast, the Greater Lowell region, Massachusetts and the United States all experienced negative growth in inflation adjusted median family income, with incomes decreasing by 0.8%, 3.6% and 4.8% respectively.

c. Per Capita Income

The U.S. Census Bureau defines per capita income as the average income received in the past twelve months for every man, woman, and child in a geographic area. It is derived by dividing the total income of all people 15 years old and over in a geographic area by the total population in that area. Income is not counted for people under 15 years old even though those individuals are included in the denominator of per capita income. As outlined in Table 15 on the next page, Dunstable’s per capita income increased from \$39,799 in 2005-2009 to \$48,133 in 2009-2013 for an increase of 20.9%. This increase in per capita income is twice as high as the region’s per capita income (10.3%), three times as high as the state’s per capita income (6.9%) growth and five times higher than the national per capita income (4.1%) growth. Individuals residing in Dunstable have done much better than those in the region, state and nation as shown in Table 15 on the next page.

Table 15: Per Capita Income for Selected Geographies (2005-2009 and 2009-2013)

| Geographic Area | 2005-2009 | 2009-2013 | % Increase | Inflation Adjusted Percentage |
|---|-----------|-----------|------------|-------------------------------|
| Dunstable | \$39,799 | \$48,133 | 20.9 | 11.0 |
| Greater Lowell Region (PMSA)/Lowell-Billerica-Chelmsford, MA-NH NECTA | \$30,873 | \$34,053 | 10.3 | 1.2 |
| Massachusetts | \$33,460 | \$35,763 | 6.9 | -1.9 |
| United States | \$27,041 | \$28,155 | 4.1 | -4.5 |

Sources: 2005 - 2009 and 2009 - 2013 American Community Survey

When adjusted for inflation, Dunstable experienced a per capita income growth of 11%, while the per capital income for the region increased by 1.2%. State and national per capital income, when adjusted for inflation, decreased by 1.9% and 4.5% respectively.

d. Income Distribution

While median household and median family incomes are valuable social and economic indicators, they do not account for the range, or distribution, of household incomes in a community. In 2009-2013 the median household income in Dunstable was \$119,022, which was lower than the median family income of \$133,942. As previously mentioned, it is typical for household income to be less than family income because, by definition, a “family” includes at least two people, which often includes two income earners. Outlined below in Table 16 is the income distribution for households in Dunstable for 2005-2009 and 2009-2013.

Table 16: Income Distribution for Households (2005-2009 and 2009-2013)

| | 2005-2009 | | 2009-2013 | | Percent Change |
|--------------------|--------------|--------------|--------------|--------------|----------------|
| | Number | Percent | Number | Percent | 2009 - 2013 |
| Less than \$15,000 | 31 | 2.9 | 29 | 2.6 | -6.5 |
| \$15,000-\$24,999 | 65 | 6.1 | 31 | 2.7 | -52.3 |
| \$25,000-\$34,999 | 12 | 1.1 | 42 | 3.7 | 250.0 |
| \$35,000-\$49,999 | 48 | 4.5 | 91 | 8.0 | 89.6 |
| \$50,000-\$74,999 | 134 | 12.5 | 126 | 11.1 | -6.0 |
| \$75,000-\$99,999 | 172 | 16.1 | 138 | 12.2 | -19.8 |
| \$100,000 or more | 608 | 56.8 | 677 | 59.7 | 11.3 |
| Total | 1,070 | 100.0 | 1,134 | 100.0 | 6.0 |

Source: 2005-2009 and 2009- 2013 American Community Survey

As shown in Table 16 on the previous page, the highest income group in Dunstable was the \$100,000 or more group in 2005-2009 (56.8%) and 2009-2013 (59.7%). This income group experienced an increase of 11.3% between 2005-2009 and 2009-2013. Even though the \$50,000-\$99,999 income groups experienced a 25.8% decrease between 2005-2009 and 2009-2013, households with incomes \$50,000 or more accounted for 83% of all households in Dunstable as of 2009-2013. There was a fairly large increase in the \$25,000-\$49,999 household income group, which should offer some opportunities for the development of low- and moderate-income housing.

Income distribution by age in Dunstable indicates that the highest median income, \$138,542, is earned by those residents in the 45-64 income group, as outlined in Table 17 below. It should be acknowledged that according to the ACS, incomes in this age category have a very high degree of sampling error and is therefore subject to considerable inaccuracies. Dunstable residents between 25 and 44 years of age are also high earners, receiving \$123,750 on average in 2009-2013. For residents 65 years and older, the median income declines dramatically to \$46,964, and is less than one third of the other age cohorts (\$48,198), reflecting the retirement status of these residents.

Table 17: Median Income by Age in Dunstable (2009-2013)

| Age | 2013 |
|--------------------------------|------------------|
| Under 25 years | N/A |
| 25 - 44 years | \$123,750 |
| 45-64 years | \$138,542 |
| 65 years and older | \$46,964 |
| Median Household Income | \$119,022 |

Source: 2009-2013 American Community Survey

e. Area Median Income

Affordable housing requirements base a household’s eligibility for income restricted units on a series of income thresholds. The U.S. Department of Housing and Urban Development (HUD) defines these thresholds as percentages of Area Median Income (AMI) – a number determined by the median family income in a given Metropolitan Statistical Area (MSA). Income thresholds are often capped at 80%, 60%, 50%, and 30% of AMI, but vary depending on the number of individuals in the household.

In general, households earning 80% of AMI are considered “moderate income”, whereas those households earning 60% of AMI are considered “low income”. Those earning 50% of AMI and 30% of AMI are considered “very low income” and “extremely low income”, respectively.

HUD income thresholds for the Greater Lowell region are used to determine which households in the region are eligible for income-restricted units, including Chapter 40B, Section 8, and Low Income Housing Tax Credit units. The values presented in Table 18 below are based on the AMI for the Lowell region, which HUD lists as \$96,400 for 2015.

Table 18: FY2015 Income Limits by Household Size, Lowell Metro FMR Area

| Income Limit Area | Median Income | FY 2015 Income Limit Category | Household Size | | | | | | | |
|-------------------------------|---------------|-------------------------------|----------------|-----------|-----------|-----------------|-----------|-----------|-----------|-----------|
| | | | 1- Person | 2- Person | 3- Person | 4- Person | 5- Person | 6- Person | 7- Person | 8- Person |
| Lowell, MA HUD Metro FMR Area | \$96,400 | 30% - Extremely Low | \$20,200 | \$23,050 | \$25,950 | \$28,800 | \$31,150 | \$33,450 | \$36,730 | \$40,890 |
| | | 50% - Very Low | \$33,600 | \$38,400 | \$43,200 | \$48,000 | \$51,850 | \$55,700 | \$59,550 | \$63,400 |
| | | 80% - Moderate | \$46,100 | \$52,650 | \$59,250 | \$65,800 | \$71,100 | \$76,350 | \$81,600 | \$86,900 |

[Source: http://www.mass.gov/hed/docs/dhcd/hd/home/hudincome.pdf](http://www.mass.gov/hed/docs/dhcd/hd/home/hudincome.pdf)
Dunstable is included in the Lowell Metropolitan Fair Market Rent (FMR) region.

There is currently limited data available that categorizes Dunstable’s income by family size. However, using household income data and the HUD thresholds, it is possible to make some generalized assumptions about the number of Dunstable residents who may be eligible for HUD assistance. Assuming a four-person household, it is possible to estimate the percent of households that fall into each income category. This is done by matching each income category with the most appropriate HUD threshold, as outlined in Table 19 below.

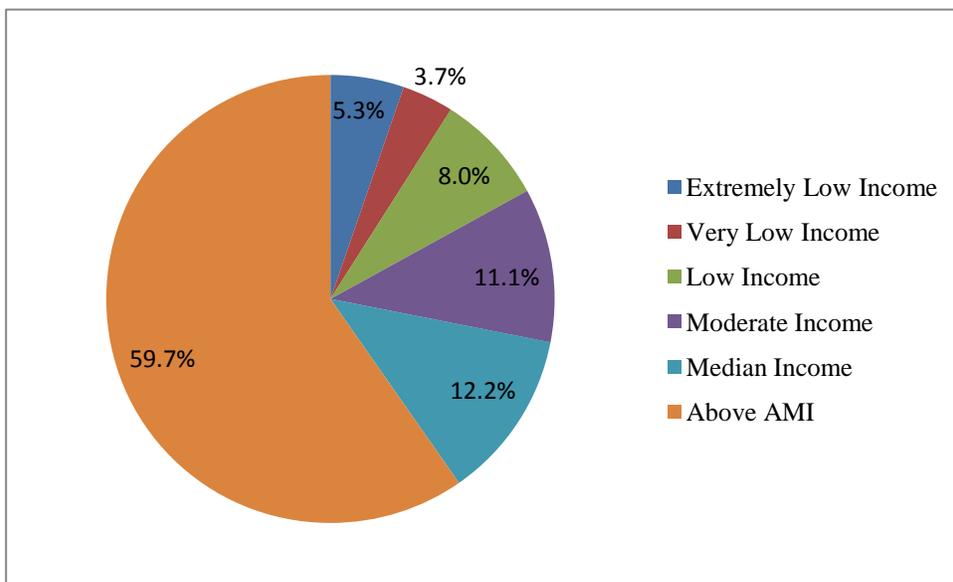
Table 19: Income Categories and Associated HUD Lowell Metro FMR Area Thresholds

| | 2013 | | HUD Threshold |
|--------------------|--------------|--------------|----------------------|
| | Number | Percent | |
| Less than \$15,000 | 29 | 2.6 | Extremely Low Income |
| \$15,000-\$24,999 | 31 | 2.7 | Extremely Low Income |
| \$25,000-\$34,999 | 42 | 3.7 | Very Low Income |
| \$35,000-\$49,999 | 91 | 8.0 | Low Income |
| \$50,000-\$74,999 | 126 | 11.1 | Moderate Income |
| \$75,000-\$99,999 | 138 | 12.2 | Median Income |
| \$100,000 or more | 677 | 59.7 | Above AMI |
| Total | 1,134 | 100.0 | |

Sources: 2009 - 2013 American Community Survey

After matching each income category to a HUD threshold, the percentage of households in Dunstable that are associated with various income thresholds can be generally estimated. As shown in Figure 3 below, an estimated 59.7% of Dunstable households earn above the Lowell Metro AMI. This indicates that nearly 72% of households in Dunstable are average to high earning households, whereas an estimated 28% still earn less than the AMI and may be eligible for HUD assistance.

Figure 3: Estimated Dunstable Households in each AMI category



Source: NMCOC staff analysis of ACS data

8. Residents Living In Poverty

Every year the U.S. Department of Health and Human Services (HHS) and the U.S. Census Bureau establish Federal Poverty Guidelines. These income thresholds vary by family size and composition to determine who is living in poverty, as shown in Table 20 to the right. If a family’s income is less than the family’s threshold, then that family and every individual, is considered to be living in poverty. The official poverty thresholds do not vary geographically, but are updated for inflation using the Consumer Price Index (CPI). The official poverty definition uses income before taxes and does not include capital gains or noncash benefits, such as public housing, Medicaid and food stamps.

Table 20: Federal Poverty Guidelines (2015)

| Number of Persons in Family | Poverty Guideline Income |
|-----------------------------|--------------------------|
| 1 | \$11,770 |
| 2 | \$15,930 |
| 3 | \$20,090 |
| 4 | \$24,250 |
| 5 | \$28,410 |
| 6 | \$32,570 |
| 7 | \$36,730 |
| 8 | \$40,890 |
| For each additional person | \$4,160 |

Source: U.S. Department of Health & Human Services, January 22, 2015

In 2013 approximately 1.2% (40 individuals) of Dunstable’s total population was classified as living in poverty.² Of those residents, more than half were 65 years and older (52.5%), while the rest were either under 18 years of age (25%) or between 18 and 64 years of age (22.5%), as outlined in Table 21 below.

Table 21: Characteristics of the Dunstable Population Living in Poverty (2009-2013)

| | Number Below Poverty Level | Percent of those in poverty |
|---|----------------------------|-----------------------------|
| Age | | |
| Under 18 Years | 10 | 25.0 |
| 18 to 64 Years | 9 | 22.5 |
| 65 Years and Older | 21 | 52.5 |
| Sex | | |
| Male | 13 | 32.5 |
| Female | 27 | 67.5 |
| Total Individuals Living in Poverty | 40 | 1.2 |
| Total Dunstable Estimated Population | 3,255 | 100.0 |

Source: 2009-2013 American Community Survey

B. Existing Housing Stock Analysis

This section examines the characteristics and condition of the current housing stock and local housing market in Dunstable. By analyzing housing types, home values, development and sales trends, and housing affordability, this examination provides a summary of affordable housing efforts in Dunstable since the publication of the *2005 Dunstable Planned Production Plan for Affordable Housing*.

1. Housing Unit Types

Dunstable’s housing stock consists principally of single-family homes. According to the 2010 U.S. Census, there were 1,057 housing units in Dunstable of which 97.8% were single-family homes. Although there were no two-family units in 2010, the estimates for the 2009-2013 ACS indicate that there are now four (4) two-family units. There were also twelve (12) 3-4 multifamily structures in 2010, which increased by 41.7% to seventeen (17) units, according to the 2009-2013 ACS. In addition there were twelve (12) nontraditional housing units (e.g. mobile homes) in 2010, as outlined in Table 22 on the next page. While the amount of housing stock has increased over time, the proportional distribution of housing types within Dunstable has remained relatively unchanged.

² For more information about how the U.S. Census Bureau defines poverty thresholds, refer to: <http://www.census.gov/hhes/www/poverty/methods/measure.html>.

Table 22: Housing Units by Type (2010 and 2009-2013)

| Number of Units per Structure | 2010 Housing Stock | | 2013 Housing Stock | | Percent Change |
|-------------------------------|--------------------|--------------|--------------------|--------------|----------------|
| | Number | Percent | Number | Percent | 2010-2013 |
| 1-unit, detached | 1,028 | 97.3 | 1,153 | 97.4 | 12.2 |
| 1-unit, attached | 5 | 0.5 | 10 | 0.8 | 100.0 |
| 2 units | 0 | 0.0 | 4 | 0.3 | - |
| 3 or 4 units | 12 | 1.1 | 17 | 1.4 | 41.7 |
| 5 to 9 units | 0 | 0.0 | 0 | 0.0 | 0.0 |
| 10 to 19 units | 0 | 0.0 | 0 | 0.0 | 0.0 |
| 20 to 49 units | 0 | 0.0 | 0 | 0.0 | 0.0 |
| 50 or more units | 0 | 0.0 | 0 | 0.0 | 0.0 |
| Mobile Home | 12 | 1.1 | 0 | 0.0 | -100.0 |
| Boat, RV, van, etc. | 0 | 0.0 | 0 | 0.0 | 0.0 |
| Total | 1,057 | 100.0 | 1,184 | 100.0 | 12.0 |

Source: 2010 U.S. Census and 2009-2013 American Community Survey

There was widespread disagreement about these housing unit figures by the Affordable Housing Committee members, particularly related to the 2009-2013 American Community Survey data. The increased sampling error for the ACS exaggerates the numbers for a small community like Dunstable and makes it difficult to compare the information directly with the U.S. Census data. In particular, there was disagreement about the number of 3-4 unit residential structures and the existence of mobile homes cited in the 2010 U.S. Census, as well as the 3-4 unit structures cited in the 2009-2013 ACS.

According to the *Dunstable Master Plan* completed in April 1999, there were 866 single-family homes, 23 2-4 unit houses and 8 “other” housing units for a total of 897 housing structures in 1998. Within the *Town of Dunstable Planned Production Plan for Affordable Housing* completed in February 2005, the 2004 housing inventory, according to the Dunstable Assessor’s Office, consisted of 972 single-family units, 11 two-family units and 60 Agriculture with Living Space units for a total of 1,044 housing structures. As of May 2015, the Board of Assessors determined that there were 1,037 single-family residential units, 9 two-family units and 48 mixed-use residential units for a total of 1,094 housing structures. Notwithstanding which figures are used, there is a need to develop multifamily units that can accommodate those residents that can’t afford to purchase a single-family home.

2. Housing Tenure

Information on housing tenure and age of householders provides additional information to plan for the appropriate types of housing to accommodate current and future households. Housing tenure figures indicate that the majority of units are owner-occupied, with the share of owner-

occupied housing increasing from 93.7% in 2010 to 94.0% in 2009-2013. The number of owner-occupied housing units increased by 7%, as shown in Table 23 below.

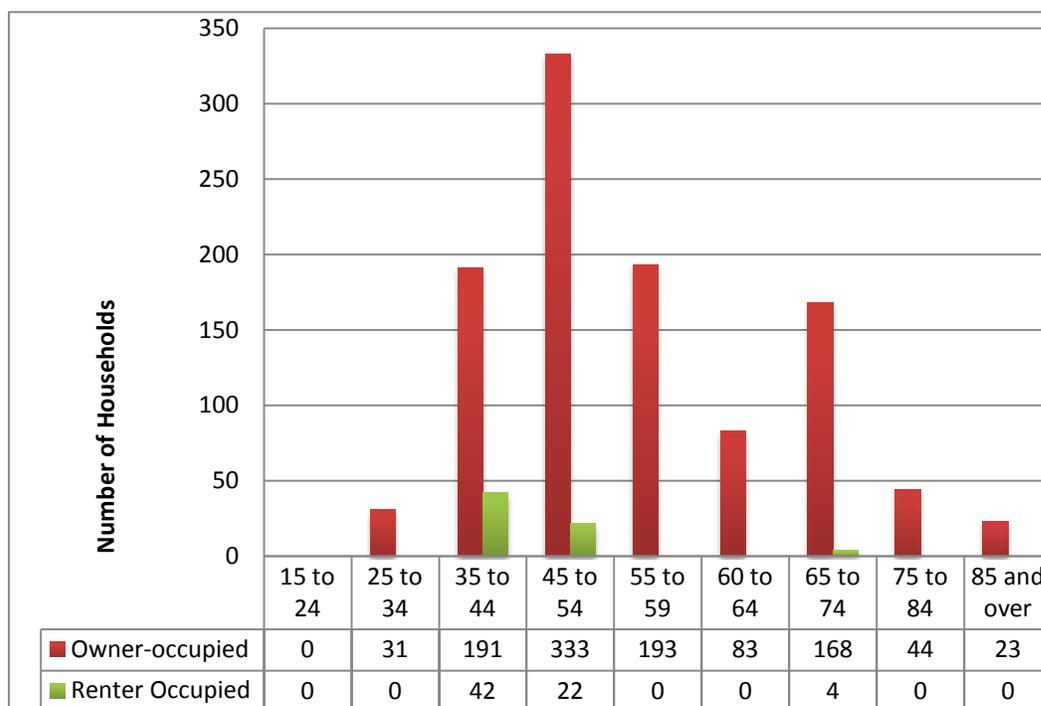
Table 23: Housing Tenure (2010 and 2009-2013)

| | 2010 | | 2013 | | Percent Change 2010 -2009/ 2013 |
|-------------------------------|--------------|--------------|--------------|--------------|------------------------------------|
| | Number | Percent | Number | Percent | |
| Owner-occupied | 996 | 93.7 | 1,066 | 94.0 | 7.0 |
| Renter-occupied | 67 | 6.3 | 68 | 6.0 | 1.5 |
| Occupied Housing Units | 1,063 | 100.0 | 1,134 | 100.0 | 6.7 |

Source: 2010 U.S. Census and 2009-2013 American Community Survey

The age of householders, both owner-occupied and renter-occupied, was also analyzed. Figure 4 below shows that home ownership is most common in Dunstable, while renters are only in the 35-44, 45-54 and 65-74 (barely) age groups. There would appear to be rental opportunities for the 55+ age groups, as well as the 25-34 age group, that should be examined as part of the *Dunstable Housing Production Plan*.

Figure 4: Age of Homeowners and Renters (2009-2013)



Source: 2009 - 2013 American Community Survey

3. New Residential Development

Examining available residential building permit data between 2004 and 2013 from MassBenchmarks provides insight into the residential development that has occurred in Dunstable for the past ten years. According to Mass Benchmarks data, there were 164 residential permits issued for 164 units between 2004 and 2013 in Dunstable, as outlined in

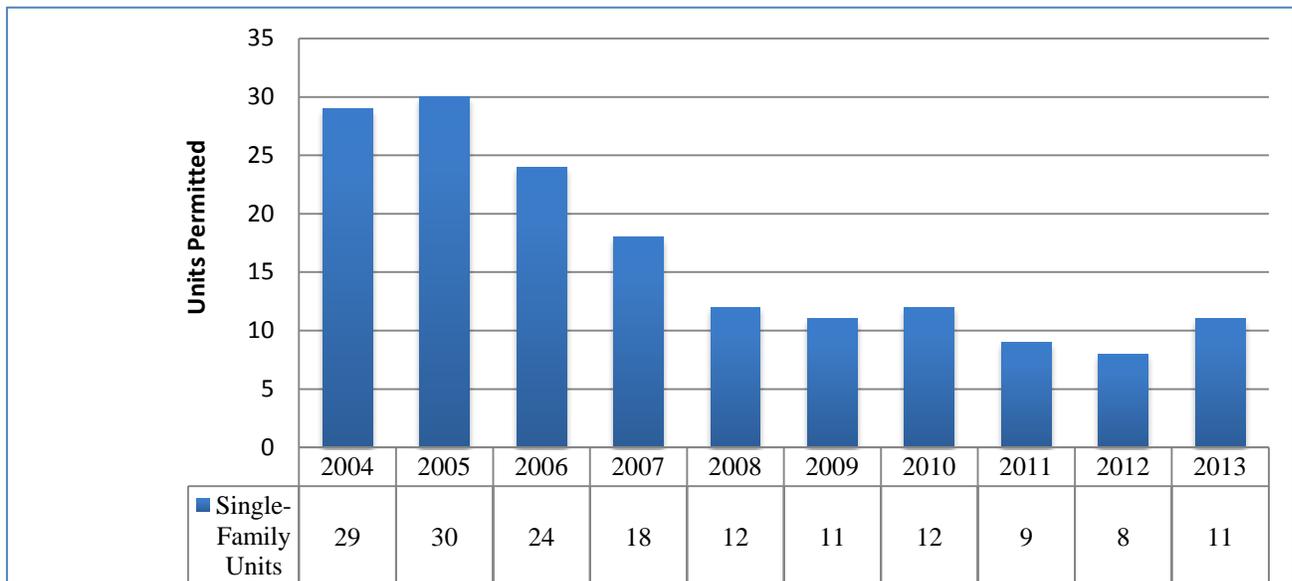
Table 24 and Figure 5 below. Typically, the number of residential units permitted is greater than the number of permits because one permit can be issued for multiple units in the case of multi-family units. The issuance of single-family permits for the past ten years, as reflected in the MassBenchmarks data, shows the continuation of the single-family housing units in Dunstable. Figure 5 on below shows the number of residential permits issued in graphic form and reflects the fact that the most residential permits were issued in the 2004-2006 period before the housing downturn occurred in 2007. The total valuation for these 164 permits was \$18,828,348.

Table 24: Residential Permits Issued in Dunstable (2004 – 2013)

| Year | Total Building Permits Issued | Total Residential Units Permitted |
|--------------|-------------------------------|-----------------------------------|
| 2004 | 29 | 29 |
| 2005 | 30 | 30 |
| 2006 | 24 | 24 |
| 2007 | 18 | 18 |
| 2008 | 12 | 12 |
| 2009 | 11 | 11 |
| 2010 | 12 | 12 |
| 2011 | 9 | 9 |
| 2012 | 8 | 8 |
| 2013 | 11 | 11 |
| Total | 164 | 164 |

Source: 2004-2013 from MassBenchmarks - <http://www.massbenchmarks.org/statedata/data.htm>

Figure 5: Residential Units Permitted by Housing Type (2004 – 2013)



Source: 2004-2013 from MassBenchmarks - <http://www.massbenchmarks.org/statedata/data.htm>

When you compare the total houses built compared to the residential permits issued, Table 25 below summarizes the housing activities in Dunstable between 2004 and 2015. The downturn in housing construction can be seen in the period from 2008 to 2010 when housing financing was difficult to secure.

Table 25: Total Houses Built Compared to Permits Issued (2004-2015)

| Year | Total Houses Built | Residential Permits Issued |
|--------------|--------------------|----------------------------|
| 2004 | 25 | 29 |
| 2005 | 11 | 30 |
| 2006 | 9 | 24 |
| 2007 | 7 | 18 |
| 2008 | 2 | 12 |
| 2009 | 0 | 11 |
| 2010 | 1 | 12 |
| 2011 | 4 | 9 |
| 2012 | 3 | 8 |
| 2013 | 5 | 11 |
| 2014 | 8 | 12 |
| 2015 | 9 | NA |
| Total | 84 | 176 |

Source: Dunstable Inspection Department and MassBenchmarks, 2016

4. Housing Market Conditions

This section examines trends in Dunstable’s housing market since 2007 in order to assess local market conditions since the development of the *2005 Dunstable Planned Production Plan for Affordable Housing*. Special attention is needed to evaluate the extent to which the Town has been impacted by the economic recession and downturn of the housing market in 2007-08. This section concludes with a discussion of the housing burden in Dunstable based on past and present housing market conditions.

a. Residential Sales

Since the end of 2012, the housing market in Dunstable appeared to be on a path of recovery. According to the Warren Group, the number of home sales in Dunstable increased from 25 in 2007 to 46 in 2014. Data from the Warren Group also indicates that for the period from 2007 to 2014, Dunstable experienced its highest number of sales in 2014 (46), and its lowest sales figure of 21 sales in 2009 as outlined in Table 26 on the next page. The proportion of sales for single-family homes and other residential units has remained relatively consistent, as outlined in Figure 6 on the next page. There were no condominium sales in Dunstable and the number of other residential unit sales has been significantly less than the single-family sales.

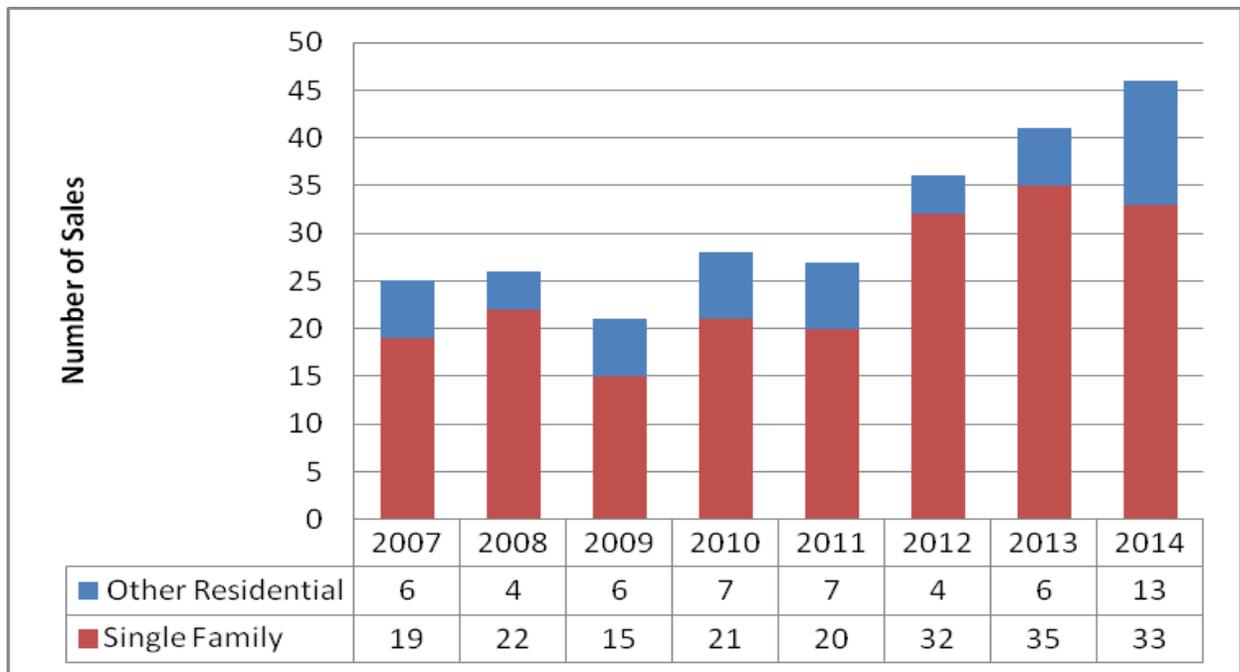
Table 26: Residential Sales in Dunstable (2007–2014)

| Period | Residential Sales | Percent of Residential Sales 2007-2014 |
|--------------|-------------------|--|
| 2007 | 25 | 10.0 |
| 2008 | 26 | 10.4 |
| 2009 | 21 | 8.4 |
| 2010 | 28 | 11.2 |
| 2011 | 27 | 10.8 |
| 2012 | 36 | 14.4 |
| 2013 | 41 | 16.4 |
| 2014 | 46 | 18.4 |
| Total | 250 | 100.0 |

Source: The Warren Group, 2015

Single-family homes represented the largest group of residential sales, comprising 78.8% of all sales, while other residential homes comprised the remainder of the sales.

Figure 6: Residential Sales in Dunstable (2007-2014)



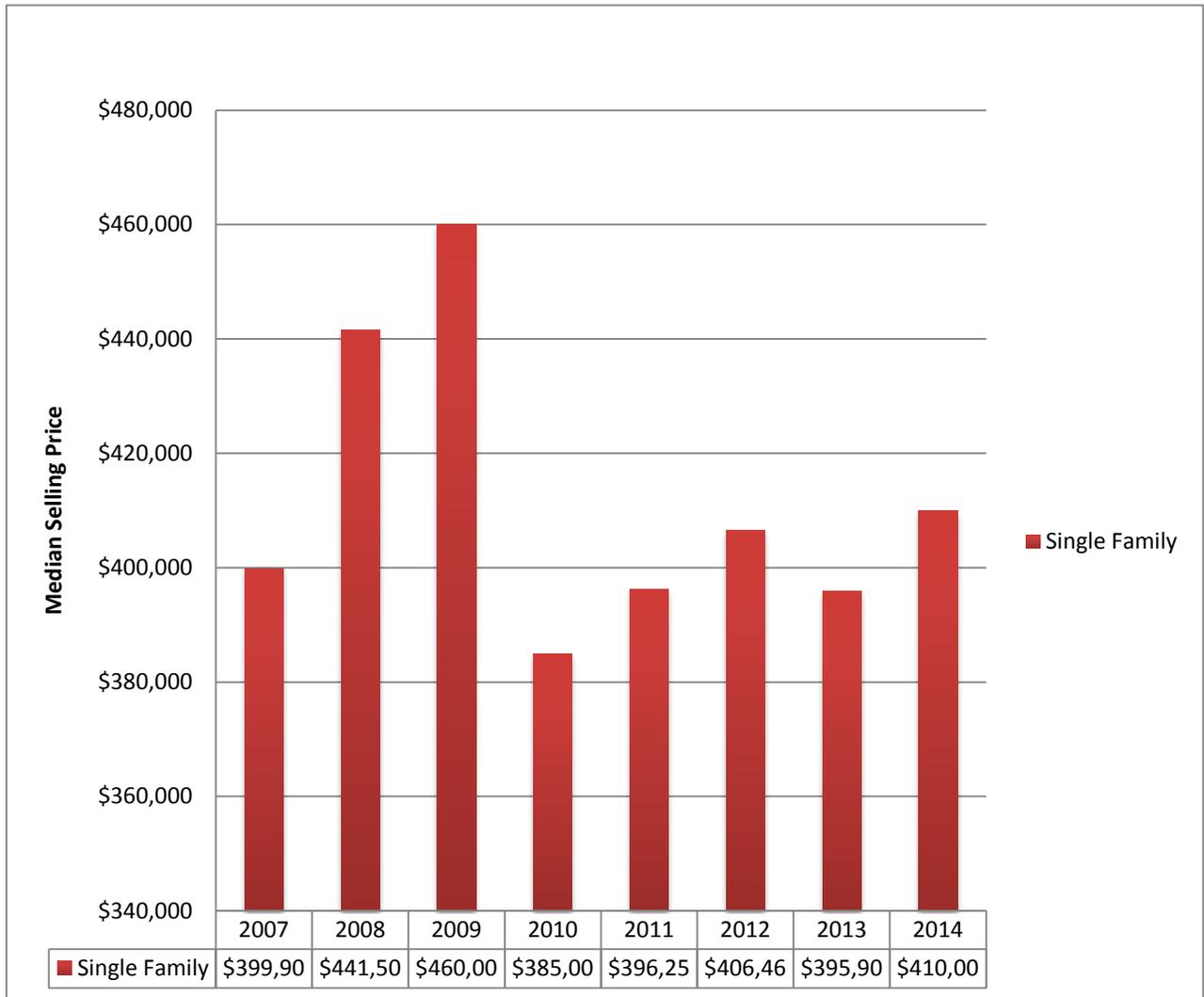
Source: The Warren Group, 2015

b. Median Selling Prices

The median selling price of single-family homes in Dunstable has increased from \$399,900 in 2007 to \$410,000 in 2014, as outlined in Figure 7 on the next page. However, the highest median selling prices were in 2009 at \$460,000, while the lowest median selling prices was in

2010 at \$385,500. When compared to the Greater Lowell region, Dunstable ranked second to Westford in 2014 relative to the median sales.

Figure 7: Median Selling Prices in Dunstable (2007-2014)



Source: Warren Group, 2015

Table 27: Median Selling Prices in Dunstable compared with the Greater Lowell region (2014)

| Community | Single Family Median Sales | Number of Sales | Condos Median Sales | Number of Sales | Total Median Sales | Total # of Sales |
|------------------------------|----------------------------|-----------------|---------------------|-----------------|--------------------|------------------|
| Billerica | \$346,000 | 383 | \$255,000 | 85 | \$339,450 | 542 |
| Chelmsford | \$369,000 | 309 | \$209,900 | 171 | \$319,900 | 521 |
| Dracut | \$262,500 | 262 | \$155,000 | 92 | \$245,000 | 446 |
| Dunstable | \$410,000 | 33 | \$0 | 0 | \$385,000 | 46 |
| Lowell | \$227,000 | 473 | \$158,000 | 311 | \$209,500 | 1,103 |
| Pepperell | \$300,000 | 106 | \$224,900 | 9 | \$295,000 | 134 |
| Tewksbury | \$342,000 | 283 | \$253,000 | 182 | \$318,400 | 527 |
| Tyngsborough | \$384,225 | 96 | \$214,000 | 43 | \$339,000 | 173 |
| Westford | \$492,500 | 210 | \$344,000 | 105 | \$383,000 | 390 |
| Greater Lowell region | \$327,168 | 2,155 | \$214,788 | 998 | \$289,555 | 3,882 |
| Massachusetts | \$330,000 | 48,963 | \$310,000 | 20,614 | \$325,000 | 89,202 |

Source: The Warren Group, 2015

c. Foreclosures

Based upon data provided by the Warren Group, the foreclosure petitions in Dunstable from 2007 to 2014 are summarized below in Table 28. The number of foreclosure petitions decreased from 5 in 2007 to 2 in 2014, or by 60%, which is consistent with declining foreclosure trends statewide. Single-family homes comprise 99% of the foreclosures during this period with other residential units showing one foreclosure in 2007. Compared to the other communities in the Greater Lowell region, the number of foreclosure petitions has been relatively low.

Table 28: Foreclosure Petitions in Dunstable (2007-2014)

| Year | Number of Single-family Foreclosures | Total |
|--------------|--------------------------------------|-----------|
| 2007 | 5 | 6 |
| 2008 | 9 | 9 |
| 2009 | 9 | 9 |
| 2010 | 6 | 6 |
| 2011 | 6 | 6 |
| 2012 | 6 | 6 |
| 2013 | 1 | 1 |
| 2014 | 2 | 2 |
| Total | 44 | 45 |

Source: The Warren Group, 2015

5. Housing Affordability Analysis

Public officials generally agree on a definition of affordable housing as that which costs no more than 30% of a household's total annual income. 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 overall analysis of the rental market.

a. Housing Burden

Viewing monthly housing costs for homeowners as a percentage of annual household costs can shed light onto the housing burden faced by Dunstable residents. Based upon data from the 2009-2013 American Community Survey, 29.7% of Dunstable homeowners with a mortgage and 25.9% without a mortgage were considered moderately burdened by their housing costs as shown below in Table 29. In total, 211 households with a mortgage and 92 households without a mortgage are experiencing housing costs of 30% or more. Similarly, 35.6% of homeowners with a mortgage and 11.8% without a mortgage are considered to be slightly burdened since their housing costs fall within the 20-29% range.

Table 29: Monthly Housing Costs as a Percentage of Annual Household Income: 2009-2013

| Characteristics | Households in Dunstable | No Burden (Less than 20%) | | Slightly Burdened (20%-29%) | | Moderately Burdened (30% or more) | |
|-------------------------------|-------------------------|---------------------------|---------|-----------------------------|---------|-----------------------------------|---------|
| | | Number | Percent | Number | Percent | Number | Percent |
| Households with a mortgage | 711 | 247 | 34.7 | 253 | 35.6 | 211 | 29.7 |
| Households without a mortgage | 355 | 221 | 62.3 | 42 | 11.8 | 92 | 25.9 |

Source: 2009-2013 American Community Survey

b. Rental Market

Renters can also be burdened by monthly rental payments. According to data collected in the 2009-2013 ACS, 15 rental households in Dunstable, or 22.1% of all rental households, are moderately burdened due to the housing costs being 30% or more of their income. Table 30 on the next page summarizes the level of burden for rental households in Dunstable in the 2009-2013 period. Similar to the ownership households, rental households can be slightly burdened as well when the overall housing costs fall within the 20-29% range. In the case of Dunstable, there were 24 rental households, or 35.3% of the rental market, that were considered slightly burdened.

Table 30: Gross Rent as a Percentage of Household Income (2009-2013)

| Rent as a Percent of Income | Number of Rental Households | Percent of Rental Households |
|-----------------------------|-----------------------------|------------------------------|
| Less than 10% | 25 | 36.8 |
| 10% to 19% | 4 | 5.9 |
| 20% to 29% | 24 | 35.3 |
| 30% to 49% | 15 | 22.1 |
| 50% or more | 0 | 0.0 |
| Total | 68 | 100.0 |

Source: 2009-2013 American Community Survey

Fair Market Rents (FMRs) are primarily used 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.³ HUD annually establishes FMRs for 530 metropolitan areas and 2,045 nonmetropolitan county FMR areas. The final FMRs for use in any fiscal year must be published and available for use on the first of October. The 2015 FMR for a single bedroom apartment in the Lowell, MA HUD Metro FMR area was \$864 per month, as outlined below in Table 31.

Table 31: Fair Market Rent for Lowell, MA HUD Metro FMR Area (2015)

| | Efficiency | 1-Bedroom | 2-Bedroom | 3-Bedroom | 4-Bedroom | 5-Bedroom | 6-Bedroom |
|------------------|------------|-----------|-----------|-----------|-----------|-----------|-----------|
| Fair Market Rent | \$750 | \$864 | \$1,109 | \$1,381 | \$1,627 | \$1,871 | \$2,115 |

Source: FY 2015 Lowell, MA HUD Metro FMR Area, Fair Market Rent Documentation System, effective October 1, 2015

According to the 2007-2013 ACS data, Dunstable had a median gross rent of \$882 as shown in Table 32 on the next page. This figure is lower than all the other communities in the Greater Lowell region. Additional data needs to be developed based upon an analysis of available rental listings for Dunstable to determine how accurate the 2007-2013 ACS data is. Based upon the fact that Dunstable has the second highest single-family house sales prices and the lowest rental costs in the region, there needs to be some balance in addressing the housing needs of the town. Given the limited number of rental households in Dunstable, the rental costs should be much higher.

³ 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 grant to fund a wide range of activities that build, buy, and/or rehabilitate affordable housing for rent or homeownership or provide direct rental assistance to low-income people.

Table 32: Median Gross Rent in the Greater Lowell region (2009-2013)

| Community | Median Gross Rent |
|------------------|--------------------------|
| Billerica | \$1,237 |
| Chelmsford | \$1,126 |
| Dracut | \$1,154 |
| Dunstable | \$882 |
| Lowell | \$979 |
| Pepperell | \$1,138 |
| Tewksbury | \$1,421 |
| Tyngsborough | \$1,062 |
| Westford | \$1,363 |

Source: 2009-2013 American Community Survey

c. Subsidized Housing Inventory (SHI)

The Department of Housing and Community Development (DHCD) 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. This information summarizes individual projects by project names, housing type (rental versus homeownership), total subsidized housing units, affordability expiration, subsidizing agency, and whether or not the development was built using a Comprehensive Permit. Based upon the 2010 U.S. Census, Dunstable had 1,085 year-round housing units and therefore, its 10% subsidized housing goal is 108 units. According to the DHCD Subsidized Housing Inventory (SHI) for May 27, 2015, Dunstable had zero subsidized housing units. Units are added and subtracted from the SHI throughout the cycle of their initial approval and occupancy. A unit is added to the SHI once it has received a Comprehensive Permit. The Town must then document that a building permit has been issued within one year 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.

d. Subsidized Housing Inventory Changes in the Region

In March 2004 there were 7,805 subsidized housing units in the Greater Lowell region, representing 7.2 % of the 2000 U.S. Census year-round housing stock in the region. At that time, only the City of Lowell and Tyngsborough had a subsidized housing stock that exceeded the 10% target level. The Town of Dunstable had zero subsidized housing units at that time.

According to the 2010 U.S. Census, the number of year-round housing units in the Greater Lowell region increased to 108,869 units. In the case of Dunstable, the number of year-round housing units increased to 1,085 units. Therefore, in order to meet the 10% subsidized housing goal, Dunstable needs to have 108 subsidized units. As of May 23, 2015, there were still no subsidized housing units in Dunstable. Within the Greater Lowell region, there were 10,051

subsidized housing units, which represented an increase of 28.8% since March 2004. Outlined below in Table 33 is the breakout of subsidized housing units by community and for the region as a whole.

Table 33: SHI Reports for the Greater Lowell region: March 2004 and May 2015

| Community | Year -Round Housing Units | Total Subsidized Housing Inventory (SHI) Units | | | Percent SHI Units | |
|------------------------------|---------------------------|--|---------------|----------------|-------------------|------------|
| | 2010 | March 2004 | May 2015 | Percent Change | March 2004* | May 2015 |
| Billerica | 14,442 | 421 | 857 | 103.6 | 2.9 | 5.9 |
| Chelmsford | 13,741 | 730 | 1,169 | 60.1 | 5.3 | 8.5 |
| Dracut | 11,318 | 290 | 719 | 147.9 | 2.6 | 6.4 |
| Dunstable | 1,085 | 0 | 0 | 0 | 0 | 0 |
| Lowell | 41,308 | 5,293 | 5,215 | -1.5 | 12.8 | 12.6 |
| Pepperell | 4,335 | 117 | 129 | 10.3 | 2.7 | 3.0 |
| Tewksbury | 10,803 | 429 | 1,037 | 141.7 | 4.0 | 9.5 |
| Tyngsborough | 4,166 | 382 | 340 | -11.0 | 10.1 | 8.2 |
| Westford | 7,671 | 143 | 585 | 309.1 | 1.9 | 7.6 |
| Greater Lowell region | 108,869 | 7,805 | 10,051 | 28.8 | 7.2 | 9.2 |

Source: Massachusetts DHCD, Chapter 40B SHI, March 2004 and May 2015

e. Affordable Housing Development in Dunstable

The *Town of Dunstable Planned Production Plan for Affordable Housing* was submitted to DHCD in February 2005 and approved shortly thereafter. According to the 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. This 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. Unfortunately, the necessary zoning changes weren't completed and the private sector was not able to produce the number of affordable units envisioned in the Plan. In fact, according to the DHCD SHI report for May 2015, the Town of Dunstable still had no subsidized housing units. In developing the *Dunstable Housing Production Plan* this time, the Dunstable Affordable Housing Committee wanted to be more realistic in its subsidized housing production schedule for the next five years.

Based upon the 2010 U.S. Census, Dunstable had 1,085 year-round housing units and, therefore, needs to have 109 subsidized housing units to meet its 10% goal. Based upon the May 2015 SHI report from DHCD, Dunstable needs 109 subsidized housing units to meet its 10% goal. Therefore, the Town would need 22 subsidized units per year over the next five years to exceed its 10% goal. Given that there are currently no "pipeline" projects moving through the Town's approval process, the Town will need to focus on developing subsidized housing units on the potential affordable housing sites outlined in Section III.

If you utilize the average growth rate in total housing units experienced by Dunstable between 2000 and 2010, or 16.3%, an additional 180 housing units could potentially be added to the Town’s housing stock between 2011 and 2020 to reach 1,264 total units. This would represent an average growth of 18 total units per year. In order to move closer to attaining the 10% affordable housing unit “gap” (109 units), 4 of the 18 units per year would need to be affordable. Table 34 below outlines a timeframe for the development of those units.

Table 34: Affordable Housing Production Timeline for Dunstable: Average Growth

| Year | Number of Market Rate Units | Number of Affordable Units | Additional Affordable Units | Total Units | Percent Affordable* |
|------|-----------------------------|----------------------------|-----------------------------|-------------|---------------------|
| 2016 | 1,188 | 0 | 4 | 1,192 | 0.4 |
| 2017 | 1,202 | 4 | 4 | 1,210 | 0.7 |
| 2018 | 1,216 | 8 | 4 | 1,228 | 1.1 |
| 2019 | 1,230 | 12 | 4 | 1,246 | 1.5 |
| 2020 | 1,244 | 16 | 4 | 1,264 | 1.8 |

Source: U.S. Census Bureau, 2010 U.S. Census; NMCOC estimates from DHCD SHI Report, May 27, 2015
**Based upon percentage of year-round housing units (1,085) in the 2010 U.S. Census.*

Since the housing market is not always predictable and the private housing market may fluctuate from year to year in the quantity of market-rate and affordable housing units developed, two alternative scenarios have been developed. Table 34 on the next page outlines two additional scenarios for Dunstable, which projects growth in subsidized housing units at 0.5% and 1.0% increases per year. A community will be certified to be in compliance with an approved Housing Production Plan (HPP) if, during a single calendar year, it has increased the number of subsidized units in accordance with the production schedule approved by DHCD. Certification lasts for one year if the community has produced the equivalent of 0.5% of year-round housing units as SHI units, and two years if it has produced 1.0%.

According to M.G.L. Chapter 40B, once a plan has been certified, the local community has greater power in controlling Chapter 40B developments because a decision by the Zoning Board of Appeals (ZBA) to deny a Comprehensive Permit application will be considered “consistent with local need,” and would be upheld by the Housing Appeals Committee (HAC). Based on the 2010 U.S. Census, Dunstable needs to produce 5 affordable units annually to achieve 0.5% development certification and 11 units per year to achieve 1.0% development certification.

If Dunstable has achieved certification within 15 days of the opening of the local hearing for the Comprehensive Permit, the ZBA shall provide written notice to the Applicant, with a copy to DHCD, that it considers that a denial of the permit or the imposition of conditions or requirements would be consistent with local needs, the grounds that it believes has been met, and the factual basis for that position, including any necessary supportive documentation.

If the Applicant wishes to challenge the ZBA’s assertion, it must do so by providing written notice to the Department, with a copy to the Board, within 15 days of the receipt of the ZBA’s notice, including any documentation to support its position. DHCD shall thereupon review the materials provided by both parties and issue a decision within 30 days of its receipt of all

materials. The ZBA shall have the burden of proving satisfaction of the grounds for asserting that a denial or approval with conditions would be consistent with local needs, provided, however, that any failure of the DHCD to issue a timely decision shall be deemed a determination in favor of the municipality. This procedure shall toll the requirement to terminate the hearing within 180 days.

As with the previous scenario, Table 35 assumes a 1.63% annual growth rate in total housing units over ten years. Under the 0.5% scenario, the Town would exceed its affordable housing production under the growth scenario: 2.4% by 2020 instead of 1.8%. Under the 1.0% increase in units per year, the Town would attain 5.3% by 2018. Under these three scenarios, Dunstable would still need additional time in order to exceed its 10% affordable housing goal. With the issuance of the 2020 U.S. Census, the number of year-round housing units in Dunstable will increase, therefore, the subsidized housing goal established by DHCD would increase as well.

Table 35: Affordable Housing Production Timeline for Dunstable – 0.5% or 1% Annually

| Year | Total Units | 0.5% Increase | | | | 1.0% Increase | | | |
|------|-------------|-------------------|-----------------------|-------------------------|---------------------|-------------------|-----------------------|-------------------------|---------------------|
| | | Market Rate Units | # of Affordable Units | Additional Units - 0.5% | Percent Affordable* | Market Rate Units | # of Affordable Units | Additional Units - 1.0% | Percent Affordable* |
| 2016 | 1,192 | 1,187 | 0 | 5 | .05 | 1,181 | 0 | 11 | 1.1 |
| 2017 | 1,210 | 1,200 | 5 | 5 | 1.0 | 1,188 | 11 | 11 | 2.1 |
| 2018 | 1,228 | 1,213 | 10 | 5 | 1.4 | 1,195 | 22 | 11 | 3.2 |
| 2019 | 1,246 | 1,226 | 15 | 5 | 1.9 | 1,202 | 33 | 11 | 4.3 |
| 2020 | 1,264 | 1,239 | 20 | 5 | 2.4 | 1,209 | 44 | 11 | 5.3 |

Source: U.S. Census Bureau, 2010 U.S. Census; NMCOC estimates from DHCD SHI Report, May 27, 2015
**Based upon percentage of year-round housing units (1,035) in the 2010 U.S. Census.*

6. Gaps between Existing Housing Needs and Current Supply

a. Small Households and Families

In 2010 more than half of Dunstable residents were between the ages of 35 and 64. Eighty-three percent (83%) of residents in family households (735) and sixty-three percent (63%) of non-family households (110) were in this category. According to the 2009-2013 American Community Survey, two-person households were the most common family household, comprising 40.1% (367) of all family households. One-person non-family households were the second most common household, comprising 86.3% of non-family households.

Between 2004 and 2013, there was a large growth in single-family homes. During that time, 164 single-family units were permitted with a total valuation of \$ 18,828,348. There were no other residential units permitted during this time period. There is a demonstrated need for duplexes and multi-family units of 3-4 units and more than 5 units. These additional residential units will

provide more housing diversity for Dunstable residents, allow older residents to remain in the community and provide an opportunity for young families to locate in the community.

As with many suburban communities in the Greater Lowell region, the housing in Dunstable is principally owner-occupied. According to the 2009-2013 American Community Survey, owner-occupied housing units comprised 94% of all the housing units. More than 75% of these owner-occupied housing units were occupied by residents in the 35-64 age cohort. Renter-occupied housing mainly consists of householders aged 35 to 44. This data shows the need for more rental housing to accommodate older residents and young families.

The growth and prevalence of nontraditional households also justifies the need to provide a variety of housing types that do not fit within the traditional, market-rate, detached single-family home model. In particular, this data indicates the importance of providing smaller, affordable dwelling units – especially for those residents who need to live with someone else due to economic necessity. In addition, future housing types will need to accommodate residents over the age of 65 who want to “age in place”. In addition to a diverse supply of housing in terms of size and structure, a range of affordability options are needed for households and families who can’t afford to pay market rate prices.

b. Aging Populations

As with most communities, the population is getting older in Dunstable. In 2010, 55.6% of Dunstable’s population was 40 years of age or older, with the 40-59 age cohort representing 39.6% of the total population. Between 2010 and 2040 the largest increase in age groups was between the ages of 25-39 and 60-74, which increased by 76.5% and 59.4% respectively. Between 2010 and 2040, the 75+ age group is expected to grow by an additional 21.9%.

Based upon the current trend of people getting married and settling down later in their thirties and the growth in residents 65 and older, the Housing Production Plan needs to embrace housing that’s affordable and flexible to meet the diverse lifestyles of these two groups. With access to services, public transit, open space, and amenities, the Town will need to determine how best to address the housing needs of these groups.

With the aging of the population in Dunstable, the need for elderly housing is increasing, while the need for younger families to share the public cost burdens is also prevalent. Larger homes can be made available to the younger families, while the elderly can be served through smaller sized ownership and rental units. The projected population trends for Dunstable have implications for housing planning and development. This Housing Production Plan will consider these unique housing needs as it develops a framework for housing production in Dunstable over the next five years.

c. Household Incomes and Poverty

The median household income in Dunstable increased by 8.9% between 2005-2009 and 2009-2013, which surpassed the Greater Lowell region, Massachusetts and the nation. However, when adjusted for inflation, Dunstable lost .1% in median household income during this period. This was far better than the decreases in median household income for the region (4.1%), the state (4.9%) and the nation (5.4%). As outlined in Table 17, the 45-64 age group had an estimated median income of \$ 138,542 according to the 2009-2013 American Community Survey, which represented the highest income group in Dunstable.

As outlined in Table 21, 40 Dunstable residents, or 1.2% of the total population, were living in poverty according to the 2009-2013 American Community Survey. The majority of those living in poverty were 65 years and older (52.5%), while those 18 years and younger comprised 25% of the total impoverished population. Based upon the HUD Income levels for assistance, 28% of Dunstable households earn less than the Area Median Income (AMI), as outlined in Table 19 and Figure 3, and may be eligible for HUD assistance.

d. Households with Housing Costs that Exceed Affordability Thresholds

In addition to looking at income, it's important to compare how much of that income is being spent on housing to determine their housing burden. In Dunstable 29.7% of households with a mortgage pay more than 30% of their income for housing, which means they are moderately burdened by their housing costs. For renters, only 22.1% of rental households pay more than 30% of their income on housing.

While renters in Dunstable are less burdened than homeowners, the Harvard Joint Center for Housing Studies has provided important and crucial information regarding rental properties through their report, entitled *America's Rental Housing: Meeting Challenges, Building on Opportunities*. This report found that “long-term increases in rents and utility costs combined with falling renter incomes put a strain on many renters' budgets. The Great Recession made matters worse, increasing the cost burden on once-secure working and middle class Americans.”⁴ Between falling incomes and rising rent prices, rental properties that are affordable for all ages needs to continue to be encouraged to maintain affordability.

C. Affordable Housing Efforts in Dunstable

a. Summary of 2005 *Dunstable Planned Production Plan for Affordable Housing*

The Town of Dunstable outlined its previous goals and strategies for the production of affordable housing through the development of the *Town of Dunstable Planned Production Plan for Affordable Housing* in 2005.

Goals

The following goals were developed by the Dunstable Affordable Housing Study Committee based upon feedback at the public forums:

1. Create affordable units that are compatible in size, scale and architecture with the prevailing rural character of Dunstable through a diverse set of strategies;
2. Create units that serve the specific housing needs of the Dunstable community at a pace that will not unreasonably burden municipal facilities or infrastructure;
3. Place the Town at the center of all development proposal negotiations to ensure that the affordable housing is consistent with the needs of the community; and
4. Discourage development that would be damaging to the existing natural resources of the community, including the local water supply, wildlife habitat and wetland areas.

Strategies

The strategies outlined by the Affordable Housing Study Committee were grouped into three categories: (1) Production-oriented strategies designed to add new units of rental or owner-occupied units, (2) Conversion-oriented strategies designed to add existing units of housing to the affordable inventory and (3) Maintenance strategies designed to track the developing inventory and identify new opportunities as they arise.

Production-oriented strategies

1. New development of apartment units
 - Collaborate with private developers that have experience in this market
 - Construct a 30-unit apartment complex at the crossing of Salmon Brook and Pleasant Street
2. New development of Single or Multi-Family Dwellings
 - Utilize the Comprehensive Permit Application process to explore potential development on Town-owned parcels.
 - Focus on the newly delineated Mixed Use District (MUD) and issue a Request for Proposals (RFP).
 - Develop affordable housing on the 40 acre River Street parcel.
3. Zoning Bylaw Amendments

- Apartments within Single-Family Residences
- Senior Residential Multi-Family Development
- Inclusionary Bylaw as Related to Standard Subdivisions
- Inclusionary Zoning as Related to Open Space Development
- Accessory Dwellings

Conversion-oriented Strategies

1. Target Units
 - Existing rental units that could be subsidized by the Town or a non-profit entity
 - Single-family homes that would sell at or near affordable levels
 - Multi-family homes that are placed on the market and may or may not be priced close to affordable levels
2. Sources of Funding
 - Community Preservation Act
 - MassHousing Partnership Fund
 - Community Development Block Grants
3. Local Outreach
 - Council on Aging
 - Groton-Dunstable Alliance for Youth
 - Dunstable Evangelical Congregational Church
 - Dunstable Seniors
 - Dunstable Grange

The Implementation Plan prepared as part of the *Planned Production Plan* covered a ten year period and reflected the production of 137 units of affordable housing. These affordable housing units were to be constructed as follows: Pleasant Street apartments (30 units), Mixed Use District Housing (40 units), Housing on Town-Owned Property (35 units), Zoning Bylaw Changes (14 units) and Existing Unit Conversion (18 units). The implementation of this plan will achieve three basic goals: (1) Satisfy the housing needs of the community; (2) Satisfy the thresholds set forth under Planned Production and Chapter 40B; and (3) Develop housing at a pace that can be accommodated by the community's infrastructure and facilities.

b. Summary of Dunstable Master Plan (1999)

The Dunstable Master Plan was completed in April 1999. The Master Plan includes several Housing Goals and Recommendations that came from the community survey, public forums and other community input as follows:

Goals

1. Since Dunstable is primarily a residential town, safeguard residential neighborhoods from encroachment by all forms of incompatible uses and other potentially damaging environmental influences.

2. Create some diversity in new residential housing units based on Dunstable's demographics, while protecting the character of the community.
3. Explore alternate forms of housing and life-care facilities for seniors.
4. Take care to carefully integrate new or expanded housing into existing districts and neighborhoods so that it is not physically or environmentally disruptive to the existing style and scale.

Recommendations

As stated in the Guide Plan for Future Land Use, the low-density, rural residential character of Dunstable should be maintained. Nevertheless, a greater variety of housing options is to be encouraged in order to provide for the housing needs of various population groups, especially seniors.

1. Regulatory Requirements

The Guide Plan for Future Land Use recommends that Dunstable maintain the existing residential zoning regulations, which require a two acre minimum lot size for residential development.

2. Open Space Development

Encourage open space (cluster) residential development in order to preserve open space or agricultural land while enhancing the character of new residential neighborhoods. Review the density and design requirements for open space residential development to assure that quality and environmental standards are upheld. Consider requiring open space development in some areas or offering incentives to developers to plan for open space development.

3. Senior Housing

Seek the development of alternative housing for seniors, such as townhouses or condominiums, or some form of special needs housing. Such development might take place in the existing R-2 zoning district or in another appropriate location to be selected in the future. Criteria for identifying locations for high-density senior housing are provided in Appendix 3-1.

The Town of Dunstable does not presently have a housing authority, but may wish to consider forming one (or another entity, such as a local housing partnership or nonprofit housing corporation) if the Town chooses to pursue the development of subsidized senior housing.

4. Studies

Form a Town housing committee to consider needed actions and possible locations related to future housing.

The Town of Dunstable has implemented some of these strategies, however, market conditions and other factors have resulted in no progress towards the 10% affordability goal. The Dunstable Affordable Housing Committee has maintained its role in advising the Town on various housing

developments and overseeing the development and implementation of this *Housing Production Plan*.

c. Affordable Housing Entity

Dunstable Affordable Housing Committee

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

4. 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 land use, zoning and infrastructure analysis, and concludes with a summary of the plans that the Town has to address these limitations.

a. Land Use Development Patterns and Potential

The land use development patterns changed in Dunstable from 1971 to 2005. From 1971-2005 the amount of developed land in Dunstable increased by 365%, while the undeveloped land decreased by 14%. Within the developed land category, commercial uses decreased by 35.4%, industrial uses were unchanged and residential uses increased by 368.1%. As of 2005, approximately 83% (8,122 acres) of Dunstable’s total acreage remained undeveloped as shown in Table 36 below.

Table 36: Land Use Development Patterns in Dunstable (1971 – 2005)

| Land Use | Acres | | | | Percent Change 1971 - 2005 | Percent of Region 2005 |
|--------------------|------------------|------------------|------------------|------------------|-------------------------------|------------------------------|
| | 1971 | 1985 | 1991 | 2005 | | |
| Developed | 398.16 | 652.33 | 1,253.59 | 1,850.79 | 364.84 | 3.14 |
| <i>Commercial</i> | 2.77 | 2.77 | 0.00 | 1.79 | -35.38 | 0.07 |
| <i>Industrial</i> | 26.80 | 62.75 | 189.11 | 0.00 | 0 | 0 |
| <i>Residential</i> | 368.59 | 585.81 | 1,064.48 | 1,725.27 | 368.07 | 3.91 |
| Undeveloped | 10,346.39 | 10,092.22 | 9,490.96 | 8,866.62 | -14.30 | 13.39 |
| Total | 10,744.55 | 10,744.55 | 10,744.55 | 10,717.41 | N/A | 8.56 |

Source: University of Massachusetts, McConnell Land Use Data; NMCOG, *Regional Strategic Plan for Greater Lowell*, Table 13.

b. 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.

- **Residential Development**

With nearly all developed land in Dunstable currently used for residential or agricultural purposes, the Town is primarily a bedroom community with single-family homes as the most common residential use. According to the Dunstable Zoning bylaw, the residential zoning districts include Single Family Residence (R-1) and General Residence (R-2). Dunstable also has a Commercial Recreational (R-1a) district which allows any use permitted in the R-1 district. In addition, there is a Retail Business District (B-1) and a Service Business District (B-2), both of which allow any use regulated in an R-1 or R-2 district.

The Single Family Residence (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 in the R-1 district is 87,120 square feet.

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 fourteen 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.

For the purpose of providing a variety of housing opportunities for residents who are 55 years and older, landowners in the R-1 district may seek a Special Permit from the Planning Board for Senior Residential Multifamily Development (SRMD), exempting the developer from lot area and frontage, yard and width of lot requirements. The number of dwelling units allowed can be no greater than the number of building lots that would otherwise be allowed on the tract, multiplied by $1^{1/4}$, and rounded to the next higher integer. 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. All dwelling units within multiple unit buildings must have a minimum floor area of 780 square feet, and no dwelling unit may contain more than three bedrooms. No SRMD project may have more than 10% of the total number of dwelling units with three bedrooms. Each dwelling unit must have at least one person fifty-five years of age or older who is both an owner and a resident. An exception to this requirement is only allowed in the event where a senior resident is deceased and there is no surviving senior resident, and the unit is owned and occupied by the deceased senior resident's surviving spouse.

As part of the site plan approval, a minimum of five percent of the total number of dwelling units shall have an affordability restriction of at least thirty years in one or more of the following ways:

- The units shall be affordable to persons or families qualifying as low income;
- The units shall be affordable to persons or families qualifying as moderate income; and
- The units shall be affordable to persons or families qualifying as median income.

The bylaw encourages the applicant to seek designation through the DHCD Subsidized Housing Inventory for the affordable units by working with a public agency, non-profit, limited dividend organization, or other suitable entity. The Planning Board may award a 10% density bonus to increase the number of dwelling units. All dwelling units awarded as a density bonus must be limited to no more than two bedrooms.

The General Residence District (R-2) 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.

While the Retail Business District (B-1) 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. Similarly, the Service Business District (B-2) is intended for commercial uses providing goods and services but allows for any use permitted in the R-1 or R-2 districts.

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.

Table 37 on the next page identifies the permitted residential uses by zoning district. Single-family development is permitted by right in all residential districts, except the MUD district where a Special Permit from the Planning Board is needed. Two-family dwellings are only permitted by right in the R-1, B-1 and B-2 districts, and by Special Permit in the MUD district. The only multifamily housing allowed by right in Dunstable is senior housing, which can be located in the R-2, B-1 and B-2 districts. Multifamily housing in the MUD, R-1 and R-1 districts requires a special permit from the Planning Board. It should be noted that only the MUD district provides for multifamily housing that is not age restricted. Dwelling units above

the first floor (that are not accessory units) are only allowed by Special Permit from the Planning Board in the MUD district. Assisted living facilities are allowed by right in the R-2, B-1, and B-2 districts. Boarding houses are allowed in every district except the MUD district, while trailers or mobile homes are not allowed in any district.

Table 37: Permitted Residential Uses by Zoning District

| Residential Use | Zoning District | | | | | |
|------------------------------------|---------------------|-------------------------|--------------------------------|-----------------------|--------------------------|-----------------------------|
| | Single Family (R-1) | General Residence (R-2) | Commercial Recreational (R1-a) | Retail Business (B-1) | Service Businesses (B-2) | Mixed Use Development (MUD) |
| Single Family Dwelling | Y | Y | Y | Y | Y | PB |
| Two- Family Dwellings | N | Y | N | Y | Y | PB |
| Multifamily Dwellings | PB (senior only) | Y (seniors only) | PB (senior only) | Y (senior only) | Y (senior only) | PB |
| Accessory Dwelling Units | ZBA | ZBA | ZBA | ZBA | ZBA | ZBA |
| Dwelling unit(s) above first floor | N | N | N | N | N | PB |
| Boarding House | Y | Y | Y | Y | Y | N |
| Assisted living facility | N | Y | N | Y | Y | N |
| Trailer or mobile home park | N | N | N | N | N | N |

Source: Dunstable Zoning Bylaw, May 2015

- **Dimensional Requirements**

As shown in Table 38 on the next page, the dimensional and density requirements for residential development are the same within each zoning district, except in the MUD district where development is subject to a Planned Unit Development Special Permit from the Planning Board. Within the R-1, R-1a, R-2, B-1, and B-2 districts residential development requires a minimum of 200 feet of frontage, and front yard, side yard and rear yard setbacks of thirty (30) feet.

In the MUD district, a minimum lot size of ten acres is required, with some density relief (up to 20%) provided for projects that include affordable housing. The minimum area allocated for each dwelling unit must be five thousand (5,000) square feet. Minimum setback, rear and side yard requirements are applied only to the periphery of the Planned Unit Development. Dwellings must comprise 75% of the floor area of the development, with the balance used for business use. Individual commercial areas cannot exceed 1,500 square feet.

Table 38: Dimensional and Density Requirements for Residential Subdivisions

| | Zoning District | | | | | |
|-------------------------|---------------------|-------------------------|--------------------------------|-----------------------|------------------------|-----------------------------|
| | Single Family (R-1) | General Residence (R-2) | Commercial Recreational (R1-a) | Retail Business (B-1) | Service Business (B-2) | Mixed Use Development (MUD) |
| Minimum Lot Area | 87,120 sf | 87,120 sf | 87,120 sf | 87,120 sf | 87,120 sf | 10 acres |
| Minimum Frontage (ft) | 200 | 200 | 200 | 200 | 200 | 0 |
| Minimum Front Yard (ft) | 30 | 30 | 30 | 30 | 30 | 30* |
| Minimum Side Yard (ft) | 30 | 30 | 30 | 30 | 30 | 30* |
| Minimum Rear Yard (ft) | 30 | 30 | 30 | 30 | 30 | 30* |

*applied only to the periphery

Source: **Dunstable Zoning Bylaw, May 2015**

- **Accessory Dwelling Units**

In May 2015, the Town added a provision to its Zoning Bylaw to allow the Zoning Board of Appeals to grant a special permit for accessory dwelling units. 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. 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.

c. Infrastructure

This section provides information on the existing sewer, water and transportation infrastructure and identifies the infrastructure gaps that present barriers to new residential development. This summary is based upon information within the Annual Town Reports, the updated Profile of the Dunstable Water Department (2014) and the *Greater Lowell Comprehensive Economic Development Strategy (CEDS) for 2009-2013*.

Sewer System

There is no public sewage system in Dunstable. All wastewater treatment is done through onsite septic systems.

Water Supply

Dunstable has a limited centralized public water supply with 102 connections, with the majority being residential customers. According to information provided through the 1998 Water Supply, Distribution & Storage Study and the Dunstable Open Space 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, which is the capacity needed to accommodate future growth in the community. There is a concern about the adequacy of the existing fire hydrant system to handle a fire emergency. Water tank trucks from other communities would be needed to address an emergency situation. The Dunstable Water Department has been identifying feasible sites for the construction of a 300,000 gallon water storage tank to address these needs. Currently, there are two 5,000 gallon below ground storage tanks.

Transportation Network and Public Transit

Dunstable is served by a regional transportation network comprised of several modes, including automobiles, buses, bicycles and pedestrians. There is no commuter rail station in Dunstable so 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.⁵

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 direct bus routes to Dunstable. However, some residents may use the Boston Express service at the Tyngsborough Park & Ride lot to South Station in Boston.

⁵ MassDot "Road Inventory Year-End Report 2012".

II. Affordable Housing Goals and Strategies

The Town’s Affordable Housing Committee developed a set of goals and strategies that will assist the Town in its efforts to develop affordable housing units in Dunstable. In order to ensure that these goals and strategies are implemented, it also recommended that these goals and strategies serve as the framework for the Housing Chapter in any future updated Master Plan. The goals are in no particular order of priority.

Housing Goals

1. Provide a variety of housing opportunities that serve all segments of the community, especially those below 80% of the area median income.
2. Maintain the rural, residential and historic character of the town through housing development.
3. Create diverse rental units, in terms of types of units (duplexes vs. multi-family) and number of bedrooms (three or more), for Dunstable residents.
4. Support the creation of workforce⁶ housing units and broaden the range of potential home-buyers and tenants.
5. Develop rental and ownership options for senior citizens, disabled residents and veterans that allow them to live independently.
6. Encourage new housing development consistent with community character and identified needs.
7. Update the zoning bylaw, development review processes and permitting policies so they are clear and consistent.
8. 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.
9. Ensure that affordable housing development in Dunstable adheres to the Commonwealth’s Sustainable Development Principles (see *Figure 8*).
10. 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.



Figure 8: Commonwealth of Massachusetts' Sustainable Development Principles

1. Concentrate Development and Mix Uses
2. Advance Equity
3. Make Efficient Decisions
4. Protect Land and Ecosystems
5. Use Natural Resources Wisely
6. Expand Housing Opportunities
7. Provide Transportation Choice
8. Increase Job and Business Opportunities
9. Promote Clean Energy
10. Plan Regionally

⁶ 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/>

Housing Strategies

Maintain Existing Housing and Expand Housing Opportunities

1. Upon the development of affordable housing units, be proactive in monitoring and maintaining them.
2. Develop more affordable rental housing (less than 30% of annual income) with the increased availability of 3- and 4-bedroom units.
3. Encourage re-use or redevelopment of underutilized property.
4. Document the specific needs of Dunstable veterans and construct affordable veterans housing units that meet those needs. Organizations like the [Veterans Northeast Outreach Center](#) and the local Veteran's agent can be consulted for housing assistance.
5. Consider Chapter 61 properties as potential affordable housing opportunities in the future.
6. Promote inclusion of affordable housing development under the Open Space Development Bylaw.
7. Incorporate the *Housing Production Plan* into future updates to the Dunstable Master Plan.
8. Work with State agencies and other stakeholders to develop group homes to provide supported, supervised living arrangements for citizens with mental and physical disabilities.
9. Utilize the Dunstable Affordable Housing Committee to implement the DHCD-approved *Housing Production Plan*.

Policies, Programs and Services

1. Evaluate and revise existing development regulations and guidelines for fairness and efficiency through the development of an Affordable Housing Permitting Guide to assist applicants in navigating the review process.
2. Working in conjunction with the Planning Board, Board of Selectmen, Zoning Board of Appeals and other town committees and boards, build upon the approved zoning changes so as to provide more affordable housing opportunities, such as through special permits for multi-family units, accessory apartments, assisted living facilities, and retirement communities.
3. Develop an Inclusionary Housing Bylaw to encourage the development of new housing that is affordable to low and moderate-income households. Model Inclusionary Housing Bylaws can be found at: http://www.mass.gov/envir/smart_growth_toolkit/bylaws/IZ-Bylaw.pdf.
4. Utilize available Community Preservation Funds to support affordable housing development with a focus on the following programs and services:
 - Community education regarding affordable housing programs;
 - First-time home buyer's assistance program;

- Rental assistance;
 - Renovation and sale of properties as affordable unit(s) from town tax lien properties acquired;
 - Purchase of property for use as an affordable housing development;
 - Provide betterment to donated buildings and/or land for use of affordable housing; and
 - Partnerships with private developers and public agencies for affordable housing initiatives that address the housing needs of the community.
5. Support legislative and/or regulatory reforms at the state level that recognize the efforts of communities like Dunstable to proactively provide “workforce housing” to serve households at 80-120% of the area median income (AMI), in addition to current efforts supporting households earning below 80% of the AMI.
 6. Adopt local selection preferences that are consistent with DHCD Affirmative Fair Housing Marketing Plan (AFHMP) Guidelines and all applicable/ State and Federal laws/ regulations. The project will justify the extent of the local preference (the percentage of units proposed to be set aside for local preference), but in no event will a local preference exceed 70% of the (affordable) units in a project.
 - Allowable Preference Categories
 - (1) Current residents: A household in which one or more members is living in the city or town at the time of application. Documentation of residency should be provided, such as rent receipts, utility bills, street listing or voter registration listing.
 - (2) Municipal Employees: Employees of the municipality, such as teachers, janitors, firefighters, police officers, librarians, or town hall employees.
 - (3) Employees of Local Businesses: Employees of businesses located in the municipality.
 - (4) Households with children attending the locality’s schools, such as METCO students.

Education

1. Provide affordable housing training and educational opportunities to local Board and Committee members and staff, including the Affordable Housing Committee. These training opportunities could include updates on current policies to support affordable housing (i.e., the Comprehensive Permit Guidelines) and any revisions to state law or regional opportunities. This will allow boards and committees to provide guidance to the development community so as to improve the quality of proposals and result in a more expedited permitting process.
2. Increase public awareness of and support for affordable housing through increased outreach and public education.

Funding

1. Pursue the purchase of units and provide a subsidized buy-down on the purchase price to qualified first-time homebuyers.
2. Develop local partnerships with developers to utilize the State's Local Initiative Program (LIP) as a means to develop "friendly 40B" development projects.
3. Research federal and state grant opportunities for the enhancement of affordable housing including: HUD's Housing for the Elderly (Section 202) Program, [Community Economic Development Assistance Corporation](#) (CEDAC) and [Neighborworks Capital](#) (NWC).

Regional Coordination

1. Participate in a Regional Housing Committee to create a Regional Housing Plan for the Greater Lowell region.
2. Work with non-profit entities, such as the [Common Ground Development Corporation](#), a subsidiary of Community Teamwork, Inc., and the Coalition for a Better Acre to develop and manage affordable housing projects.
3. Collaborate with other communities to promote First-Time Homebuyer Program opportunities in the region and state to make existing homes more affordable.
4. Research and promote Foreclosure Assistance Programs through the State's Emergency Homeowners Loan Program (EHLP) or Community Teamwork, Inc. to help homeowners avoid foreclosure and maintain strong residential neighborhoods.

III. Housing Production Plan Implementation Requirements

A. Characteristics of Proposed Residential or Mixed Use Developments

The Board of Selectmen and the Zoning Board of Appeals will consider the adoption of a Comprehensive Permit Policy that reflects the expectations of the Town for housing developed under Chapter 40B. By outlining what our expectations are through the adoption of a Comprehensive Permit policy, we believe that the development community would be able to produce the affordable housing that meets the needs of our community. The components of a Comprehensive Permit Policy will include the following elements;

- The Town will not limit a comprehensive permit submittal process for reasons of zoning districts or geographic location.
- The Town will be proactive in supporting affordable housing developments and the review of such developments will include documentation of the potential impacts upon schools, water, traffic, recreation, open space, agriculture, community character and the recommendations in the Master Plan.
- The Town will consider the future growth impacts on the community as identified in the *Housing Production Plan* (HPP) and will work in partnership with private developers and public agencies to ensure that the affordable housing initiatives are in the best interest of the community.
- The Town will consider a variety of affordable housing initiatives, including multifamily, mixed use and open space residential subdivisions (OSRD), accessory apartments, assisted living facilities, retirement communities, and other opportunities.
- Preference for available affordable housing program opportunities will be given to Dunstable residents and municipal employees. Meeting the needs of our community is primary in our vision and plan for future housing growth and opportunities.
- The Town will comply with all applicable federal and state housing policies and will continue to meet the requirements of the Chapter 40B program.

B. Proposed Modifications to Zoning Districts to Create SHI Housing Units

As outlined in the Permitted Residential Uses by Zoning District, single-family development is permitted by right in most zoning districts (R-1, R-1a, R-2, B-1, and B-2). Two family residential development is permitted by right in the R-2, B-1, B-2 and MUD districts. Senior occupied multifamily dwellings are permitted with a special permit from the Planning Board in the R-1, R-1a, R-2, B-1, B-2 and MUD districts. These dwellings are also permitted in the Mixed Use District by Special Permit from the Planning Board as part of a Planned Unit Development.

The Town has identified eleven privately-owned and publicly-owned parcels of land (Tables 39 and 40) that might require zoning bylaw changes to permit any residential development other than single-family. Any changes to the zoning bylaw will need to be presented to Town Meeting for adoption. Where appropriate, it is anticipated the Town will modify the zoning bylaw to support the creation of affordable housing units in order to meet its housing production goals.

C. Privately-Owned Land with Potential for Affordable Housing

In meeting the DHCD requirement to identify potential affordable housing sites, the Dunstable Affordable Housing Committee identified privately- and publicly-owned parcels throughout the community that could be developed for affordable housing in the future. Numerous parcels were identified and studied for current use, zoning, location and site characteristics. NMCOG staff conducted site visits to identify the development limitations of the identified properties, which are included under the characteristics/site constraints column of Tables 39 and 40.

As shown below in Table 39, five (5) privately-owned sites were identified, which could generate 50-100 additional affordable housing units, depending upon the development constraints of each individual property. 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. As stated in the Policy and Regulatory Reform strategies section, the Town is committed to coordinating the actions of the various boards and committees on the development of these parcels to meet the open space and historic preservation goals of the Town as well. Map 1 in the Appendix shows the location and distribution of these parcels throughout the community, while Maps 2 and 3 show the location of these parcels in relation to the current zoning and overlay districts. Map 4 highlights the Wetlands, Floodplains and Rivers Protection Act Regulated areas, while Map 5 shows these sites in relation to the Town’s water infrastructure.

Table 39: Privately-owned Parcels with Potential for Affordable Housing

| Site Address | Acres | Current Use | Map/Block/Lot | Characteristics/ Site Constraints | Zoning District | Zoning Bylaw Amendment (Y/N) |
|------------------|-------|------------------------------|---------------|---|-----------------|------------------------------|
| 0 River Street | 110 | Developable Residential Land | 2-4 | Heavily wooded, developable residential land with generally flat elevation varying approximately 20 feet, gradually sloping east to the Unkety Brook marshlands. Adjacent to the Nashua River Rail Trail at River Street and north of parcel 3-1. | R-1 | Y |
| 39 Lowell Street | 17.5 | Developable Residential Land | 17-4-1 | Includes roughly five acres of cleared land surrounding a four acre pond, including about a half acre of paved parking area used by Dumont Enterprises. Approximately | R-1 | Y |

| Site Address | Acres | Current Use | Map/Block/Lot | Characteristics/ Site Constraints | Zoning District | Zoning Bylaw Amendment (Y/N) |
|-----------------|-------|--|---------------|---|-----------------|------------------------------|
| | | | | 130 feet of frontage on Lowell Street currently serves as right-of-way access to the adjacent Dumont Enterprises garage and equipment parking. An easement for high voltage wires takes up roughly four acres on the southern portion of the lot. | | |
| 0 Lowell Street | 41 | Developable Residential Land | 17-6-1 | Mixed-use interior lot potentially accessed by 17-4-1 (no frontage) 11 acres north of the high voltage wire easement is generally level, cleared land currently used by Dumont Enterprises for dirt, gravel or debris piles. The area south of the power easement includes about four acres of mostly cleared land, low lying wetlands, and hillside woodlands. | R-1 | Y |
| 0 Main Street | 9 | Potentially Developable Residential Land | 17-13 | Approximately seven acres of cleared interior land north of high voltage power lines with areas sloping southward. Potentially accessed by 17-4-1 and 17-6-1 (no frontage) or Westford Street Northwest portion of land slopes steeply to mixed wooded/wetlands. | R-1 | Y |
| 0 Main Street | 20 | Undevelopable Residential Land | 17-91 | Heavily wooded lot of varying elevation without Main St frontage, potentially accessed from 12-119 (common owner). Relatively steep banks surround a wetlands area southeast of center of lot. Elevation on lot varies by 40 feet. Lot is within DEP Approved Wellhead Protection Area (Zone II). | R-1 | Y |

Zoning Districts: R1 – Single Family Residence; R-1a – Commercial Recreational; R-2 – General Residence; B3 – Expanded Commercial. **Overlay Districts:** MUD – Mixed-Use; Floodplain Overlay District.

D. Publicly-Owned Land with Potential for Affordable Housing

The Affordable Housing Committee has been able to identify six (6) publicly-owned potential housing sites that could provide 25-35 additional affordable units to the SHI Inventory. The sites outlined on the next page in Table 40 have various constraints to being developed, including wetlands, slope of the land, size constraints and limited access. The Town is committed to

evaluating tax possession parcels and any future land use changes on Town-owned land to assess the potential for affordable housing development. Map 1 in the Appendix shows the location and distribution of these parcels throughout the community, while Maps 2 and 3 show the location of these parcels in relation to the current zoning and overlay districts. Map 4 highlights the Wetlands, Floodplains and Rivers Protection Act Regulated areas, while Map 5 shows these sites in relation to the Town’s water infrastructure.

Table 40: Publicly-owned Parcels with Potential for Affordable Housing

| Site Address | Acres | Current Use | Map/Block/Lot | Characteristics/ Site Constraints | Zoning District | Zoning Bylaw Amendment (Y/N) |
|---------------------|-------|-----------------------|---------------|--|-----------------|------------------------------|
| 91 River Street | 39 | Vacant municipal site | 1-7 | Property borders Nashua River (across from the Pepperell airport) with roughly 17 acres of cleared, level land, including a single family house, a large barn for a tree service operation, and a half-mile oval gravel or dirt track. Approximately 14 acres are wooded along River Street and the wooded southwestern 13 acres are split by Unkety Brook wetlands. | R1 | N |
| 160 Pleasant Street | 1.01 | Vacant municipal site | 12-48 | Almost triangular lot with level frontage. Southern rear portion is wooded and slopes down towards parcel 12-49-1. | R-1 | N |
| 164 Pleasant Street | 28.51 | Vacant municipal site | 12-49-1 | Approximately 12 acres of mostly level and cleared municipal land bounded by Salmon Brook wetlands on the west and steep slopes on the east. | R-1 | N |
| 320 Main Street | 2.41 | Vacant municipal site | 17-143 | Wooded lot with varied elevation and some exposed ledge. The southern portion of the property slopes down approximately 40 feet. | R-1 | N |
| 330 Main Street | 2.19 | Vacant municipal site | 17-143-1 | Wooded lot with varied elevation and some exposed ledge. The southern portion of the property slopes down approximately 30 feet. | R-1 | Y |

| Site Address | Acres | Current Use | Map/ Block/Lot | Characteristics/ Site Constraints | Zoning District | Zoning Bylaw Amendment (Y/N) |
|--------------------|-------|--------------------------|-------------------|--|--------------------|------------------------------------|
| 340 Main Street | 3.09 | Vacant municipal site | 17-143-2 | Includes frontage on Main and Lowell Streets and the foundation of the historic Kendall- Cummings barn. Property slopes roughly 25 feet from Main Street towards Lowell Street. | R-1 | Y |

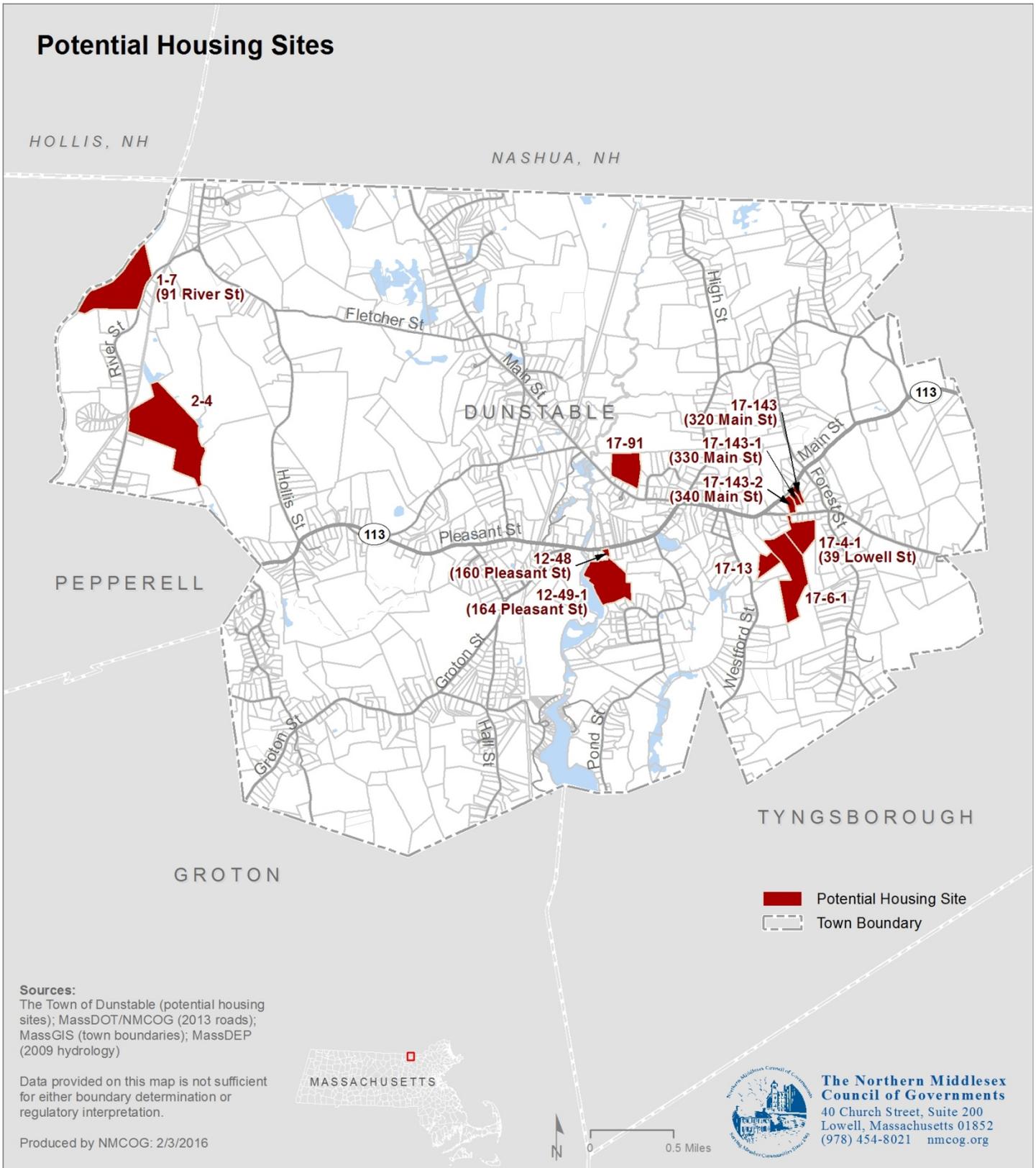
E. Participation in Regional Collaborations that Address Housing Development

Dunstable will investigate the following opportunities to participate in regional initiatives to develop affordable housing in the Greater Lowell region:

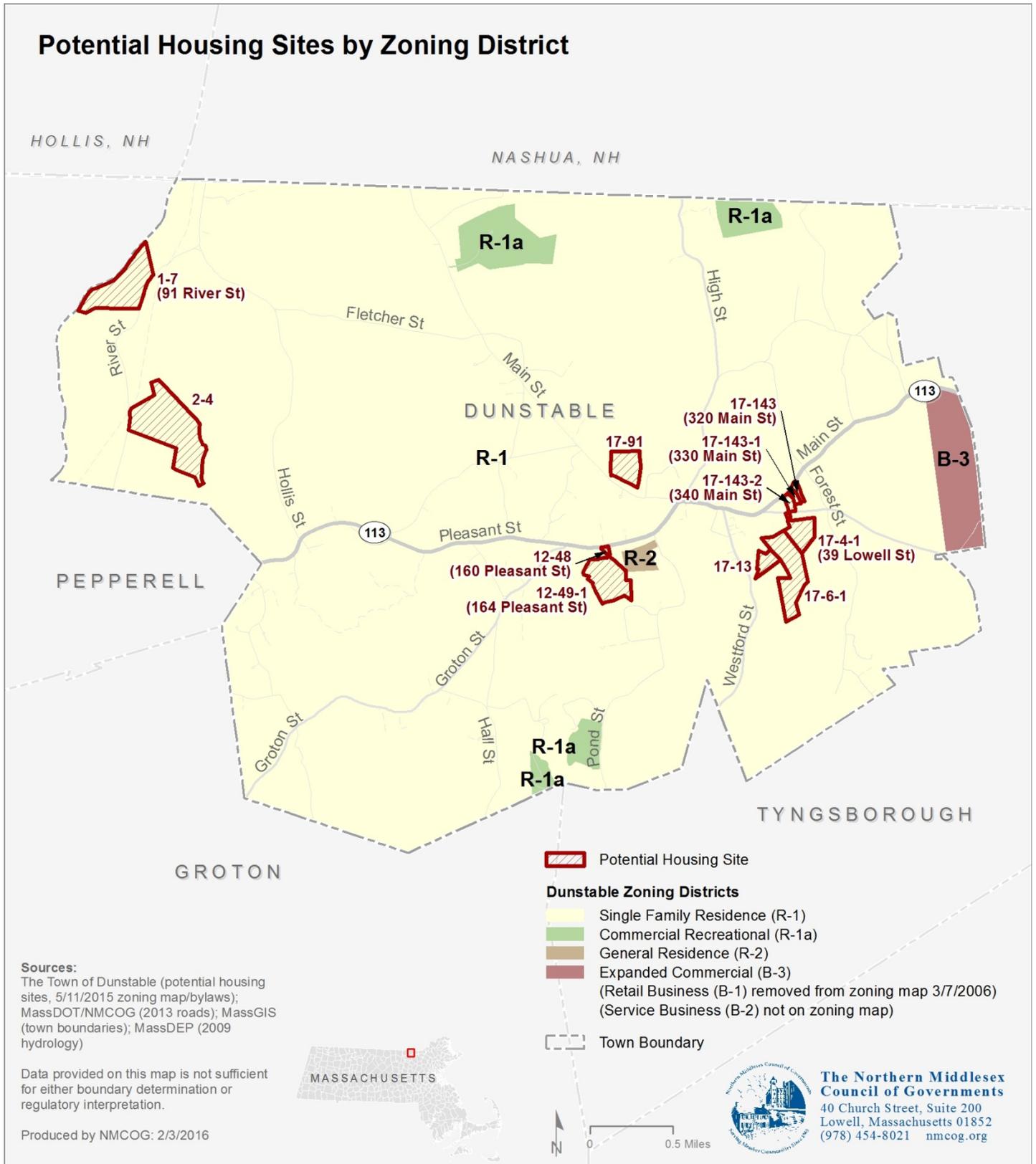
- Investigate the resources available through the Common Ground Development Corporation, Inc. the non-profit development arm of Community Teamwork, Inc. (CTI), and the Coalition for a Better Acre (CBA);
- Work with the Northern Middlesex Council of Governments (NMCOG), local communities and housing entities in the Greater Lowell region to develop a Regional Housing Plan; and
- Continue to research opportunities to implement development strategies outlined in the *Greater Lowell Regional Strategic Plan*.

Appendix A: Maps

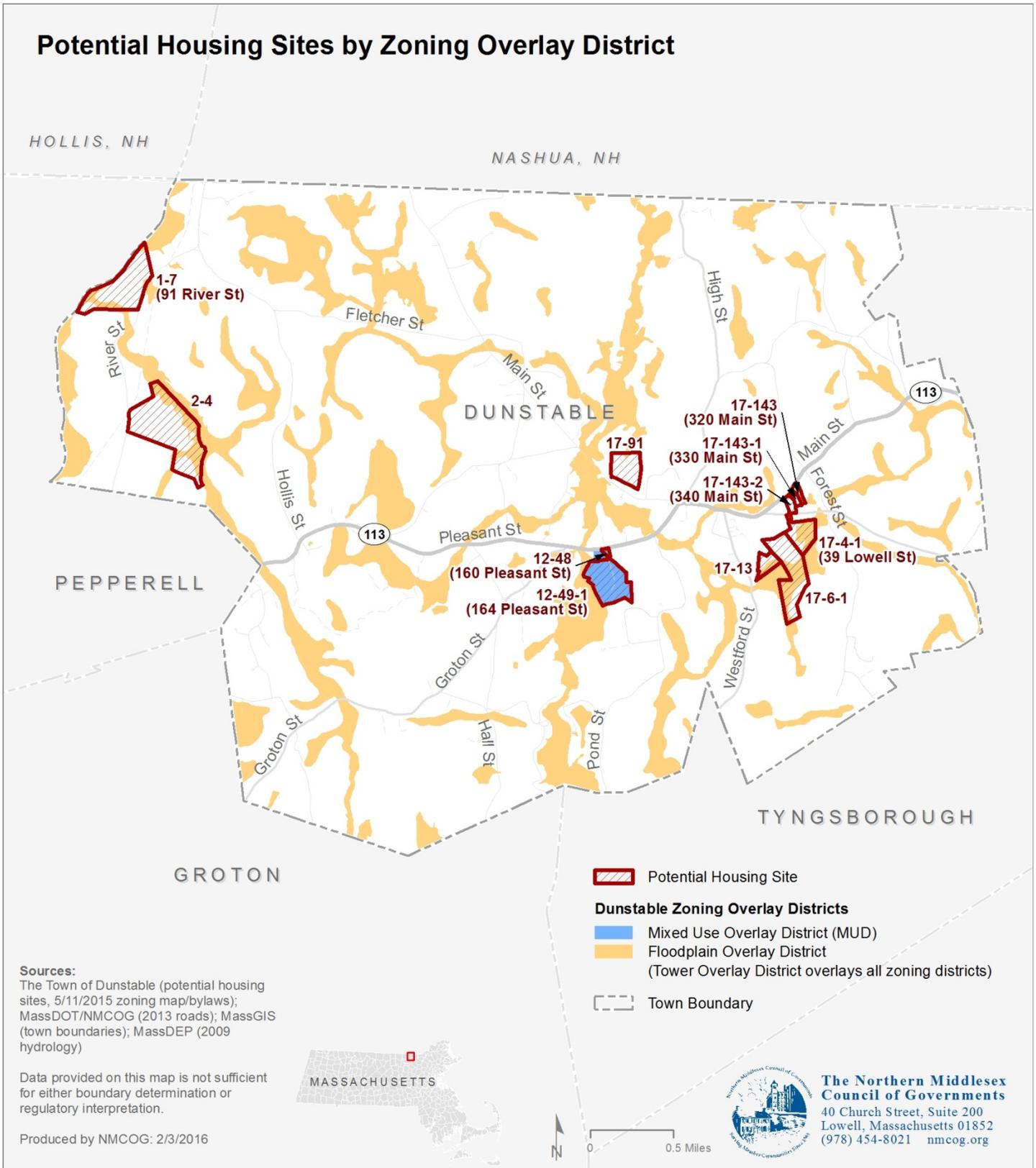
Map 1: Potential Housing Sites



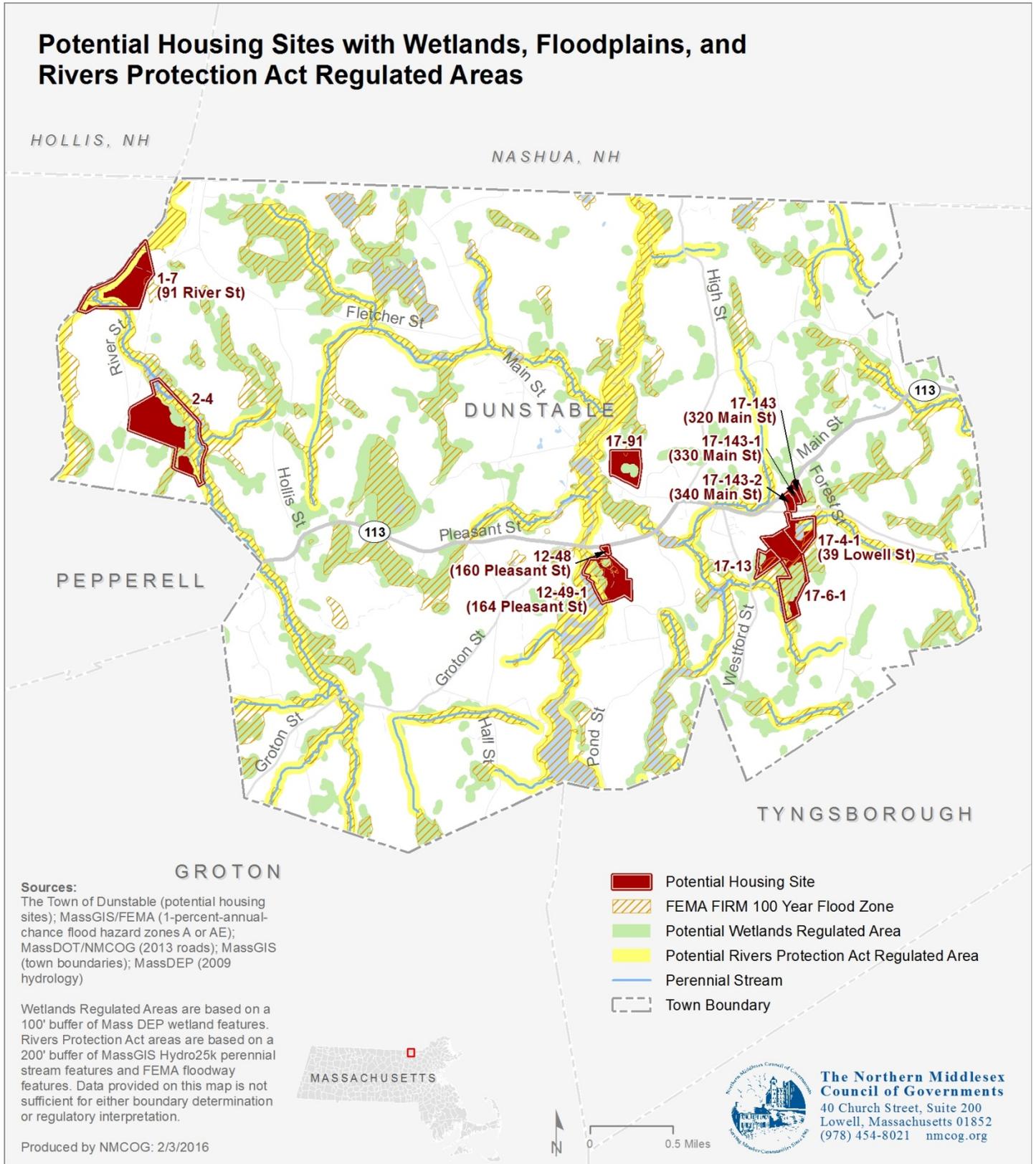
Map 2: Potential Housing Sites by Zoning District



Map 3: Potential Housing Sites by Zoning Overlay District



Map 4: Potential Housing Sites with Wetlands, Floodplains, and Rivers Protection Act Regulated Areas



Map 5: Potential Housing Sites with Water Infrastructure

