

Table of Contents

Executive Summary	i
A. Westford’s Affordable Housing Goal	i
B. Comprehensive Needs Assessment	ii
1. Population and Households	ii
2. Income	iii
3. Housing Production, Sales, and Costs	iii
C. Addressing Local and State Affordability Goals for Housing Production	iv
D. Housing Production Plan Implementation Requirements	ix
I. Introduction	1
A. Overview of the Housing Production Plan	1
B. Defining Affordable Housing	2
C. Methodology, Data Sources, and Definitions	3
II. Comprehensive Needs Assessment	6
A. Demographic Analysis	6
1. Population	6
2. Households and Household Types	7
3. Age Distribution	8
4. Household Size	9
5. Household Characteristics	10
6. Age Cohorts	12
7. School Enrollment and Projections	14
8. Race and Ethnicity	15
9. Residents with Disabilities	16
10. Household, Family, and Per Capita Income	16
11. Residents Living in Poverty	22
B. Existing Housing Inventory Analysis	24
1. Housing Units and Types	24
2. Housing Tenure	25
3. New Residential Development	25
4. Housing Market Conditions	27

5.	Housing Affordability Analysis	30
6.	Affordable Housing Development	38
7.	Gaps between Existing Housing Needs and Current Supply	41
8.	Affordable Housing Efforts in Westford	42
C.	Development Constraints and Limitations	48
1.	Land Use Development Patterns and Potential	48
2.	Zoning	48
3.	Infrastructure and Service Limitations	56
III.	Affordable Housing Goals and Strategies	60
IV.	Affordable Housing Goals and Strategies	60
A.	Housing Goals	60
B.	Priority Housing Strategies	62
C.	Additional Housing Strategies	63
1.	Policy and Regulatory Reform	63
2.	Education	64
3.	Expand Housing Opportunities	65
4.	Local and Regional Programs and Collaboration	65
V.	Housing Production Plan Implementation Requirements	67
A.	Guidelines for Proposed Residential or Mixed-Use Developments	67
B.	Proposed Modifications to Zoning Districts to Create SHI-Eligible Housing	70
C.	Privately-Owned Land with Potential for Affordable Housing	71
D.	Publicly-Owned Land with Potential for Affordable Housing	73
E.	Participation in Regional Collaborations that Address Housing Development	73
	Appendix: Maps	75
	Map 1. Existing Subsidized Housing Units and Potential Development Sites	76
	Map 2. Potential Development Sites with Zoning Districts	77
	Map 3. Potential Development Sites with Water Infrastructure	78
	Map 4. Potential Development Sites with Wetlands, Floodplains, and RPA Regulated Areas	79
	Map 5. Potential Development Sites with LRTA Bus Routes and Commuter Rail	80

List of Tables

Table 1: Actual and Projected Population (2000–2040)	6
Table 2: Total Number of Households (2000-2040)	7
Table 3: Household Types (2010, 2010-14, and 2015-19)	7
Table 4: Head of Household Age Distribution (2000, 2010, 2010-2014, and 2015-2019)	8
Table 5: Household Size - Family and Nonfamily (2010, 2010-14, and 2015-19)	10
Table 6: Household Characteristics (2000, 2010, 2010-2014, and 2015-2019)	11
Table 7: Age Distribution of Westford Residents (2010, 2010-2014, and 2015-2019)	12
Table 8: Projected Age Distribution of Westford Residents (2020-2040)	13
Table 9: Racial and Ethnic Diversity of Residents (2000, 2010, and 2020)	15
Table 10: Characteristics of the Community with Disabilities in Westford (2015-2019)	16
Table 11: Median Household Income (1999, 2010-2014 and 2015-2019)	17
Table 12: Median Family Income (1999, 2010-2014, and 2015-2019)	18
Table 13: Per Capita Income for Selected Geographies (1999, 2010-2014, and 2015-2019)	19
Table 14: Household Income Distribution (1999, 2010-2014, and 2015-2019)	20
Table 15: Adjusted Income Limits by Household Size, Lowell Metro FMR Area, FY 2021	21
Table 16: Income Categories and Associated Lowell Metro FMR Area Thresholds	21
Table 17: Federal Poverty Level Guidelines for 2019	22
Table 18: Characteristics of the Population Living in Poverty (2015-2019)	23
Table 19: Total Number of Housing Units (2000, 2010-2014, and 2015-2019)	25
Table 20: Housing Tenure (2000, 2010-2014, and 2015-19)	25
Table 21: New Residential Building Permits/ Units Issued (2010 - 2020)	27
Table 22: Recorded Sales for Residential Properties in Westford (1950-2020)	28
Table 23: Comparison of Median Sales Prices in Westford and the Greater Lowell region (2020)	30
Table 24: Monthly Housing Costs as a Percentage of Annual Household Income (2010-2014 and 2015-2019)	31
Table 25: Gross Rent (2015-19)	32
Table 26: Gross Rent as a Percentage of Household Income (2015-19)	32
Table 27: Fair Market Rent for Lowell, MA HUD Metro FMR Area (FY 2021)	33
Table 28: Median Gross Rent in the Greater Lowell region (2010-2014 and 2015-2019)	33
Table 29: Changes in Westford’s Subsidized Housing Inventory (2010-2021)	34
Table 30: Subsidized Housing Inventories in the Greater Lowell region (January 2014-June 2021)	35
Table 31: Westford Subsidized Housing Inventory (SHI) (December 9, 2021)	35
Table 32: Pipeline of Subsidized Housing Inventory Projects as of October 2021	38
Table 33: Affordable Housing Production Timeline for Westford – 0.5% or 1% Annually	40
Table 34: Affordable Housing Trust Fund Allocations & Expenditures (2016 - November 2021)	45
Table 35: Community Preservation Committee Affordable Housing Appropriations (FY 2017-2021)	46
Table 36: Land Use Development Patterns in Westford (1985-2016)	48
Table 37: Housing Types by Zoning Districts	49
Table 38: Allowed Residential Uses by Zoning District	50
Table 39: Dimensional Requirements for the Residence A and B Districts	50

Table 40: Land Area by Zoning District	51
Table 41: Tax Assessor’s Records by Land Use, RA and RB zones, FY 2021	52
Table 42: Affordability Component of Development Types	55
Table 43: Privately-Owned Parcels with Potential for Affordable Housing	72
Table 44: Publicly-Owned Land with Potential for Affordable Housing	73

List of Figures

Figure 1: Head of Household Age Distribution, All Households (2000, 2010, 2010-2014, 2015-2019)	9
Figure 2: Age Distribution of Westford Residents (2010 and 2015-2019)	13
Figure 3: Westford Public School Enrollment (2016/2017 to 2020/2021)	14
Figure 4: Westford Public School Projections (2021/2022)	15
Figure 5: Median Household Income (1999 and 2015-2019)	17
Figure 6: Median Family Income (1999 and 2015-2019)	18
Figure 7: Per Capita Income for Selected Geographies (1999 and 2015-2019)	19
Figure 8: Estimated Westford Households in each AMI Category (2015-2019)	22
Figure 9: Age of Residents Living in Poverty: 2015-2019	23
Figure 10: Residential Building Permits/Units Issued (2015-2020)	26
Figure 11: Home Sales in Westford (2011-2020)	29
Figure 12: Median Home Sales Prices in Westford (2011-2020)	29
Figure 13: Westford Water Consumption, Million Gallons Pumped (MGP) (FY2016-FY2020)	58
Figure 14: Commonwealth of Massachusetts's Sustainable Development Principles	62

Executive Summary

The Town of Westford requested the assistance of the Northern Middlesex Council of Governments (NMCOG) in developing a Housing Production Plan (HPP) that meets all of the requirements of a Chapter 40B Housing Production Plan under the Massachusetts Department of Housing and Community Development's (DHCD) regulations and guidelines.¹ Through funding provided by DHCD under the District Local Technical Assistance (DLTA) program, NMCOG staff worked closely with the Westford Affordable Housing Trust Committee, its Housing Production Plan Subcommittee, Town of Westford staff, and Housing Authority staff during 2021 and early 2022 to complete this plan.

In meeting the requirements of Chapter 40B, municipalities are encouraged to develop a five-year Housing Production Plan (HPP) to meet the minimum requirements to have at least 10% of the year-round housing inventory designated as meeting affordable housing requirements as set forth by law. This HPP includes a goal to achieve 10% of the Town's total, year-round housing units designated as income-eligible, deed-restricted, and meeting affirmative fair marketing rules which could be listed on the Subsidized Housing Inventory (SHI). As of 2010, the Town had 7,671 year-round housing units. Based upon the DHCD requirements, Westford needs 767 affordable units to meet its 10% goal. As of December 2021, Westford had 1,069 units, or 13.9%, on its SHI, surpassing the 10% goal.

The *Westford Housing Production Plan for 2022-2026* consists of a Comprehensive Housing Needs Assessment, Affordable Housing Goals, and Implementation Strategies. The plan 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. This plan was adopted by the Westford Planning Board on _____ and the Select Board on _____. Once adopted, the plan was submitted to DHCD for approval on _____.

The *Westford Housing Production Plan for 2022-2026* was first discussed at the Affordable Housing Trust Committee meeting of April 7, 2021. A subcommittee was assigned to work closely with Town staff and NMCOG on the plan. The HPP was discussed at 16 public committee and/or subcommittee meetings between June 16, 2021 and June 2, 2022. This included a questionnaire filled out by AHTC members and town staff. The AHTC had a final public meeting to review and approve the final draft of the HPP and recommend its approval by the Conservation Commission, Planning Board, and Select Board.

A. Westford's Affordable Housing Goal

The *Westford Housing Production Plan for 2017-2021* submitted to DHCD was approved on December 22, 2016, and the Town of Westford actively worked to implement that plan for the last five years. This plan, the *Westford Housing Production Plan for 2022-2026*, addresses how affordable units will be developed in order to continue exceeding the 10% goal and meeting the Town's affordable housing needs, even as DHCD updates the goal upon the release of the full 2020 U.S. Decennial Census.

¹ G.L. c. 40B, §§ 20-23 and 760 CMR 56.00

There are 48 affordable housing units currently in the permitting process, or “pipeline”, that could be added to the SHI in the near-term. This would bring the Town’s total to 1,117 affordable units, or 14.6%, on the SHI. However, it is important to note that the total year-round housing inventory number will be updated which may shift this goal. Although the 2020 U.S. Decennial Census has been completed and preliminary redistricting data has been released, this data has not been adjusted to exclude seasonal or non-year-round units. DHCD requires the full data release to determine the new number of units required to meet the 10% goal, which is anticipated in 2022. It is expected the goal will rise, given that Westford has built many year-round housing units since 2010. Therefore, it continues to be important to exceed the current 10% goal to be ready for the new target goal.

In addition, it is important that the Town’s affordable housing stock reflects the Town’s evolving housing needs. As part of a Comprehensive Needs Assessment, the *Westford Housing Production Plan for 2022-2026* utilizes population and household projections prepared by the Massachusetts Department of Transportation (MassDOT) and the UMass Donahue Institute with input from NMCOG. MassDOT developed these population and household projections for the Greater Lowell region for 2020, 2030, and 2040. These projections are based upon a statewide model that assigns a specific share of population to each Metropolitan Planning Organization (MPO) region and then to the individual communities. NMCOG staff provided comments on the draft projections, and the final projections were adjusted in response to those comments. This report utilizes projections made before the 2020 U.S. Decennial Census because the updated projections are not anticipated to be available until 2022.

This report also heavily relies upon U.S. Decennial Census data collected every ten years or, when U.S. Decennial Census data is not available, the U.S. Census American Community Survey (ACS), which is collected every year and includes additional questions not on the Decennial Census, but is an estimate based on a small sample of the population.

B. Comprehensive Needs Assessment

Westford 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:

1. Population and Households

- Between 2010 and 2020, Westford’s population grew by 12.3%, resulting in a population of 24,643 in 2020. The Town’s population represented 7.9% of the total population for the Greater Lowell region. This was an unexpected level of growth; it is greater than the projected 2030 population in the MassDOT/UMass Donahue Institute model. By 2040, Westford’s population is projected to decrease to 22,873 residents. However, updated projections were not available at the time of this report’s release.
- Westford’s households increased from 7,498 households in 2010 to an estimated 8,571 in 2015-19 according to the ACS. The growth rate is projected to slow in 2020-2030 and then reverse, with population decreasing in 2030-2040. By 2040, there are projected to be 9,480 Westford households.

- In 2010, 82.2% of Westford’s households were family² households. According to the 2015-19 ACS, the percentage of family households decreased to 80.5%. Two-person family households represented the most prevalent (34.1%) of family households in 2015-19. The trend of a steep increase in the number of households without children continued from 2,042 in 2010 to an estimated 4,881 in 2015-19.
- Westford’s population is aging. Residents aged 60-74 are projected to decrease by 28.7% from 2025 to 2040 as they age into the 75+ category, which is projected to increase by 78.4% in the same time period.

2. Income

- Median household income in Westford increased by 47.5% between 1999 (\$98,272) and 2015-19³ (\$144,917), which is slightly lower than the percentage increase in the region but higher in absolute terms. When adjusted for inflation, the median household income in Westford was slightly down, decreasing by 4.1%. This is similar to Westford’s inflation-adjusted per capita income, which decreased by 4.0%.
- When adjusted for inflation, the median family income in Westford between 1999 and 2015-19 was roughly steady, increasing by 0.7%. The income trends are similar to the Greater Lowell region, Massachusetts, and the United States, in which the Great Recession slowed family and per capita income growth before partially recovering in recent years.
- According to the 2015-19 ACS, nearly 67% of Westford households earned \$100,000 or more.
- In 2015-19, an estimated 500 residents, or 2.1% of the town’s population, were living under poverty. Roughly 19% of those were youth under the age of 18, and a growing proportion (27.4%) were 65 years and older.

3. Housing Production, Sales, and Costs

- The majority of housing units in Westford are single-family, detached homes, which make up 81.5% of the housing inventory, according to the 2015-19 ACS.
- Of all homes, 86.2% were owner-occupied rather than renter-occupied, a smaller proportion than 2010-14 (91.9%).
- Between 2016 and 2020, 196 building permits were issued for 696 residential units. A major multi-family development was permitted in each of the years 2017, 2018, and 2019.
- Residential home sales hit a high mark in 2020 when 291 single-family and 127 condominiums were sold. This was a large jump from previous years. Median sales prices were correspondingly high at \$646,000 for single-family homes and at \$440,000 for condominiums in 2020.⁴
- According to the 2015-19 ACS, about 25.3% of owner-occupied households in Westford were considered at least moderately burdened by their housing costs, paying more than 30% of their

² As defined by the U.S. Census Bureau, family households have two or more members related by birth, marriage, or adoption.

³ 1999 data based on 2000 U.S. Decennial Census, 2015-19 data based on the ACS

⁴ Number of sales and median sales price based on data from the Warren Group

income on housing costs. Approximately 37.5% of the rental households in Westford were considered at least moderately burdened by their rental costs.

C. Addressing Local and State Affordability Goals for Housing Production

In order to implement Westford's affordable housing goals, strategies to address the housing needs of the community have been developed. These strategies are designed to increase and improve housing opportunities in Westford, including subsidized housing. The strategies are summarized below and are further described in **Section III Affordable Housing Goals and Strategies**.

Housing Goals

Housing Goals are aspirational guidelines including related trackable performance measures to determine whether the Town is advancing each goal.

- 1. Environmentally Sustainable Housing:** Ensure current and new housing is consistent with the Town's Climate Action Resolution (2020) to move towards net-zero greenhouse gas emissions by 2050. Housing should implement strategies laid out in the November 2021 Westford Climate Roadmap, specifically those sections governing the reduction of greenhouse gas emissions in residential buildings.
Measure: Number of existing and new affordable units that have advanced the strategies of the November 2021 Westford Climate Roadmap
- 2. Housing for the Lowest Income Residents:** Create and preserve affordable housing at levels at or below 80%, with a special emphasis to provide housing to people who make at or below 60% of the Area Median Income (AMI) throughout the Town to support socio-economic and racial diversity, equity, and inclusion.
Measure: Number of units affordable to people who make at or below 60% AMI
- 3. Housing for Seniors, People with Disabilities, and Sober Housing:** Create and preserve housing targeted toward special populations below the AMI, including seniors aged 55 years of age or older, people with disabilities, and people recovering from addiction; this may include a focus on single-level living, group housing, and/or supportive housing.
Measure: Number of affordable units restricted to or targeted at seniors or people with disabilities or units offering support or special accessibility to those populations
- 4. Housing for Workforce:** Create and preserve diverse housing units for households at 80-120% of the AMI to support economic development initiatives and broaden the range of potential homebuyers, including a wide variety of housing types for young adults, families, and for families that need three or more bedrooms.
Measure: Number of units affordable to those at 80-120% of AMI, types of units including geographic location, building typology, ownership and rental units, and number of bedrooms
- 5. Housing for Those Currently or at Risk of Becoming Unhoused:** In keeping with the State's "Housing First" priority, provide affordable rental units for families suffering from homelessness

in Westford by coordinating with programs like those offered through the Westford Housing Authority and Community Teamwork, Inc.

Measure: Number of units provided to those currently unhoused or at risk of becoming unhoused

- 6. Promote Sustainable Development Patterns:** Support the goals of M.G.L. Chapter 40A Section 3A as created in the Housing Choice Act by reducing barriers to multi-family housing near existing infrastructure and community services such as along Route 110, along Route 40, and in appropriate scales near areas of concentrated development.

Measure: As of right multi-family unit capacity of zoning in appropriate geographic areas.

- 7. Continue to Update Permitting and Ordinances for Ease, Consistency, and Flexibility:** Continue to coordinate the work of Town boards and departments with permitting responsibilities in order to achieve greater consistency in the interpretation and administration of local requirements, ensuring that they are fair, clear, consistent, and aligned with the goals of the Town's Comprehensive Master Plan.

Measure: Ordinances and permitting procedures reviewed and amended as necessary

- 8. Town Board, Committee, and Public Education:** Vigorously continue to promote outreach and education to Town Boards, Committees, and the general public, which includes the definition, promotion, understanding, and appreciation of affordable housing.

Measure: Number of people reached by educational materials

- 9. First Time Homebuyer Education:** Provide education to buyers of affordable units including the principles of home ownership, deed restrictions, escrow for maintenance and repair, condo association budgeting, special assessments, other increasing expenses, and the good governance responsibilities of trustees.

Measure: Number of homebuyers reached by educational materials

- 10. Promotion of Rental Units:** Given that rental units provide an affordable alternative to home ownership that does not require down payments, maintenance costs, or other costs related to home ownership, promote developments that provide quality and ecologically sustainable rental units at affordable rates.

Measure: Number of rental units as a share of overall housing in Westford

- 11. Grow Partnerships:** Partner with public, private, non-profit, and other organizations (such as private developers, Habitat for Humanity, CHOICE, Inc., etc.) to promote additional affordable housing opportunities.

Measure: Number of shared initiatives

- 12. Monitor and Report Progress:** Monitor and chart the progress of affordable housing production to ensure that the Town is meeting annual production goals.

- 13. Sustainable Development Principles:** Encourage housing development in Westford to adhere to the Commonwealth's Sustainable Development Principles

Priority Housing Strategies

Housing Strategies are concrete actions the Town should undertake in order to achieve the goals listed in the previous sub-section. The following strategies are major initiatives for the Town to undertake during the HPP's period of performance. These are larger, more overarching strategies than the strategies listed in the following sub-section and will be treated as priorities.

1. **Multi-family Housing Zoning Bylaw:** Actively pursue adoption of a zoning bylaw amendment to address the requirement pursuant to M.G.L. Chapter 40A Section 3A for a district that permits multi-family housing as of right. To the degree practical, the Town shall strive to incentivize the types of residential development needed to address the goals of this Housing Production Plan and to preserve Westford's Subsidized Housing Inventory. This may include evaluation of an affordable housing requirement within the amendment and ensuring its compatibility with the zoning bylaw's other affordable housing requirements (see also **Additional Housing Strategy 1a**).
2. **Accessory Dwelling Units Zoning Bylaw:** Pursue amendments to the zoning bylaw to simplify permitting for Accessory Dwelling Units (ADUs).
3. **Analyze the Town's SHI:** Examine Westford's SHI to assess the following information:
 - a. What proportion of the units on the SHI are restricted as affordable in perpetuity?
 - b. How many SHI units have non-permanent affordability restrictions and when would they expire?
 - c. What proportion of units included on the SHI are rental units versus home ownership?
 - d. What proportion of units included in the SHI are actually subject to affordability restrictions? (i.e., affordable in fact versus market-rate units)
 - e. What proportion of SHI units are restricted at 80% AMI? 60% AMI? 50% AMI or lower?

Based on results, suggest specific goals that target perceived shortcomings. Focus support on projects that address the greatest housing needs as identified in the Housing Production Plan.

Additional Housing Strategies

1. Policy and Regulatory Reform

- a. Consider and develop an Inclusionary Zoning article in the Zoning Bylaw that would enhance the consistency of affordable unit development in the Town of Westford, provide additional flexibility in creating or funding units, and standardize requirements to the extent possible, meeting the goals enumerated in the *2009 Comprehensive Master Plan*. This should include consideration of the following:
 - Revise the Flexible Development Bylaw to increase affordability requirements and consider adding similar affordability requirements to the OSRD Bylaw;
 - Revise the Mill Conversion Overlay District Bylaw to update the affordability requirements;

- Revise the Senior Residential Multi-family Overlay District Bylaw to increase affordability requirements; and
 - Consider developing and adopting an option to donate to the Affordable Housing Trust (AHT) as part of special permit approval in lieu of building affordable units
- b. As part of—or in addition to—the requirements pursuant to M.G.L. Chapter 40A Section 3A, strengthen the zoning bylaw's flexibility and predictability to increase density in areas in which it would be appropriate to encourage housing creation to meet demand while maintaining or enhancing quality of life through the following measures:
- Allow upper-story residential units in the Business and Limited Business Districts and reduce the required lot sizes to reflect existing neighborhood character and reduce the number of non-conforming lots;
 - Consider changes to the zoning bylaw to allow town house and small-scale multi-family housing types as uses in residential districts through a Special Permit;
 - Allow duplexes in residential districts through a Special Permit;
 - Extend the Mill Overlay District to include neglected commercial properties; and
 - Explore the creation of a mixed-use overlay district that could allow for repurposing of commercial properties impacted by changing work and shopping patterns exacerbated by the COVID-19 pandemic;
- c. Evaluate and revise existing development regulations and guidelines for fairness and efficiency. At the initial public hearing for a Comprehensive Permit project, the ZBA evaluates the need for outside peer review with cost estimates and may, at that time, require submittal of fees based on the need for outside peer review. If those fees were waived or reduced to be consistent with the size of the project, it may lessen the burden on the developer and allow for issues to be identified and addressed early on in the process.
- d. Coordinate planning efforts for open space, economic development, and affordable housing initiatives among the following boards and commissions: Planning Board, Select Board, Conservation Commission, Affordable Housing Trust Committee, Housing Authority, Historical Commission and Community Preservation Committee, and the Tax Possession Sales Committee around land acquisition to identify priority parcels for preservation, economic development, and the creation of affordable housing. Consider establishing a Land Use Priorities Committee with a representative from the Affordable Housing Trust Committee.
- e. Update the *Zoning Board of Appeals Comprehensive Permit Rules and Regulations*, as amended April 16, 2008, ensuring it is complete and consistent with the *2009 Westford Comprehensive Master Plan*, this Housing Production Plan, and the current DHCD 40B regulations and guidelines.
- f. Support legislative and/or regulatory reforms at the state level that recognize the efforts of communities like Westford to proactively serve households at 80-120% of the area median

income (AMI), a demographic with demonstrated housing need in Westford and the region. This is in addition to continued efforts to support households earning below 80% of the AMI.

- g.** Create or support a mechanism to review and ensure proposed fees, such as condo fees, are properly calculated and advertised to account for the lifecycle of the project and include sufficient accounting for required capital improvements, long-term maintenance, and rising utility costs.

2. Education

- a.** Make training and educational opportunities on affordable housing available for Town Board and Committee members and staff. This could include updates on current policies to support affordable housing and any revisions to state law or regional opportunities. This will allow boards and committees to provide guidance to the development community to improve quality of proposals and could result in a more expedited permitting process.
- b.** Connect interested property owners in Westford to training, educational opportunities, and other resources that would provide support, encouragement, and funding for developing affordable housing or participating in affordable housing programs, paying special attention to smaller property owners who may be interested but lack the experience or resources of larger developers.
- c.** Increase public awareness of and support for affordable housing through increased outreach and public education, including close coordination with the Town's Veterans Service Officer/Veterans Agent and the League of Women Voters.
- d.** Provide education to buyers of affordable units including the principles of home ownership, deed restrictions, escrow for maintenance and repair, condo association budgeting, special assessments, other expenses which may change over time, and good governance responsibilities of trustees.
- e.** Research and promote First-Time Homebuyer Program opportunities in the region and state to make existing homes more affordable. Connect households to resources through Community Teamwork, Inc. (CTI), Habitat for Humanity, the Coalition for a Better Acre (CBA), and the Merrimack Valley Housing Partnership (MVHP).
- f.** Research and identify Foreclosure Assistance Programs in the region and State to help homeowners avoid foreclosure. Connect households to resources like the State's Emergency Homeowners Loan Program (EHLN) and Community Teamwork, Inc.

3. Expand Housing Opportunities

- a.** Encourage development of more affordable rental housing.

- b. Promote affordable senior housing units and, in particular, those that support “aging in place⁵”.
- c. Address the local need for affordable family ownership housing, primarily 3- and 4-bedroom units.
- d. Continue to support development of workforce housing units. These units are defined as those projects that serve residents between 80-120% Area Median Income (AMI). While they don’t count toward Westford’s subsidized housing inventory, they do meet a demonstrated need in Westford and the region.
- e. Set aside Community Preservation Act (CPA) Funds to provide down payment assistance to families purchasing affordable homes.
- f. Support group homes and other housing options that accommodate those with all types of disabilities, veterans, seniors aged 55 years of age and older, and those recovering from addiction, through partnerships with state funding agencies and non-profit entities.

4. Local and Regional Programs and Collaboration

- a. Examine ways for the Town to accept private contributions in support of affordable housing.
- b. Continue to participate in the 495/MetroWest Partnership’s *495/MetroWest Development Compact Plan*, which supports the continued production and preservation of housing for households at 80-120% of the AMI, and is creating a shared framework for state, regional, and local strategies for priority development and land preservation, as well as transportation and other infrastructure investments in the 37 municipalities.
- c. Research and consider establishment of local property tax abatement programs for low-income seniors and veterans and promotion of existing tax relief available in Massachusetts, including but not limited to the tax abatement for veterans with disabilities.
- d. Explore innovative affordable housing ideas and policies such as Community Land Trusts (CLTs) with local and regional partners and support those initiatives if appropriate for Westford

D. Housing Production Plan Implementation Requirements

Section IV, Housing Production Plan Implementation Requirements of the Housing Production Plan describes the characteristics preferred for affordable housing in Westford, the zoning changes that would need 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.

⁵Aging in place is the ability to live in one’s own home for as long as possible. While this is often associated with access to services and healthcare, constructing housing units that allow seniors to remain in their home as they age is of critical importance to maintaining their independence and mobility. For additional information consult <http://www.seniorresource.com/ageinpl.htm>

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. Twenty (20) privately-owned and two (2) publicly-owned sites were identified through this process. It is anticipated that between 225 and 335 new housing units could be developed on the identified sites. The list of potential housing sites will be used as a guide in implementing the Housing Production Plan. The potential housing sites are identified through the attached Map 1 and are shown through additional maps in the document related to zoning districts, zoning overlay districts, wetlands, floodplains and Rivers Protection Act Regulated Areas, water infrastructure, and LRTA bus routes and commuter rail.

Town of Westford Housing Production Plan for 2022-2026

I. Introduction

The development of housing that is accessible and affordable to residents 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, also known as 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”.⁶ While many residents understand the need for more affordable housing options in Westford and across the region, housing developments proposed vis-à-vis the Comprehensive Permitting process are often controversial. Therefore, Westford desires to continue its strong record of proactively planning for housing options.

The development and approval of a local Housing Production Plan (HPP) is an integral component of achieving safe harbor status from Comprehensive Permit/40B proposals in Massachusetts. The Massachusetts Department of Housing and Community Development (DHCD) defines an HPP as “a proactive strategy for planning and developing affordable housing”. According to DHCD, “the community should: (1) develop a strategy which will be used to meet its affordable housing needs in a manner consistent with the Chapter 40B statute and implementation requirements; and (2) produce housing units in accordance with its HPP.”⁷

A. Overview of the Housing Production Plan

To qualify for approval from DHCD, an HPP must contain three main components: 1) a Comprehensive Needs Assessment; 2) Affordable Housing Goals and Strategies; and 3) Implementation Strategies. The purpose of the Comprehensive Needs Assessment is to determine the community context, which relies on demographic, community development (zoning and infrastructure), and economic data to assess the extent to which the existing housing inventory meets the housing needs of a community.

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

.⁸

⁶ Department of Housing and Community Development, 2016

⁷ “Housing Production Plan Section II. B of “MG.L. c. 40B Comprehensive Permit /Projects Subsidized Housing Inventory.” GUIDELINES Updated October 2020,” Department of Housing and Community Development, 2020

⁸ DHCD Guidelines for MGL 40B Comprehensive Permit Projects, Subsidized Housing Inventory, updated December 2014, and based upon Regulatory Authority 760 CMR 56.00.

Finally, the Implementation Strategies section of the plan identifies specific sites for the development of affordable housing, assesses municipally-owned land which the community has targeted for mixed-income housing, and identifies regional housing development collaborations, including potential zoning changes to support housing production.

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 year-round housing units by a certain amount. Certification lasts for one year if the community has increased its Subsidized Housing Inventory (SHI) units by 0.5% of year-round housing units and two years if it has increased its number of SHI units by 1.0%. According to Chapter 40B, once a plan has been certified, the local community has greater power in controlling future Comprehensive Permit projects because a decision by the Zoning Board of Appeals (ZBA) to deny an application will be considered “consistent with local need,” meaning that the ZBA’s decision would be upheld by DHCD’s Housing Appeals Committee (HAC).

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

B. Defining Affordable Housing

There are several definitions of affordable housing in the United States depending on whether one uses 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.⁹ When a household pays more than 30% of its income on housing-related costs, it is considered “burdened” by housing; households spending 50% or more of their income on housing are considered “severely burdened” according to HUD affordability criteria.

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” housing is reserved for households earning 30% or less AMI;
- “Very low income” households earn between 31% and 50% AMI;
- “Low income” households earn between 51% and 60% AMI; and
- “Moderate income” households earn between 61% and 80% AMI.

In assessing a community’s progress toward the Commonwealth’s 10% affordability goal, DHCD counts a housing unit as affordable if it is subsidized by state or federal programs that support low- and

⁹ Rental units housing costs are gross rent plus associated utilities. Owner-occupied housing costs are cost of mortgage, property taxes, and insurance. Source: US Department of Housing and Urban Development.

moderate- income households at or below 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; and
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 or if 20% of units are income restricted at $< 50\%$ AMI; and
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.

Based on the 10% criteria established by DHCD, the Town of Westford needs to develop a total of 767 affordable units in order to achieve its affordability goal based on the number of year-round housing units (7,671) recorded in the 2010 U.S. Decennial Census. The Town’s latest (December 2021) Subsidized Housing Inventory (SHI) count was 1,069 affordable units or 13.9% of the total year-round housing units on the 2010 Decennial Census. Because Westford has exceeded the 10% statutory minima, the state’s Housing Appeals Committee is required to uphold any decision by the Zoning Board of Appeals on Comprehensive Permit projects as “consistent with local needs.”

The 2020 U.S. Decennial Census reported 9,237 total units, but an unknown number of these are vacant seasonal and will not count as year-round units for the purposes of computing a SHI goal.¹⁰ Therefore, depending on the number of seasonal vacant units, Westford’s SHI units would represent between 11.6% and 12.5% of 2020 year-round units. It is anticipated that the DHCD will update the affordability goal when the full 2020 U.S. Decennial Census data is officially released in 2022. Even above the statutory minima, the Town may continue to add affordable housing by the Local Incentive Program (LIP), by approving Comprehensive Permit projects, or through other means. By continuing to add new units to the HPP, the Town of Westford will not only meet the affordable housing needs described in this HPP, but also maintain its current “safe harbor” status even as new market-rate units are constructed.

C. Methodology, Data Sources, and Definitions

The *Westford Housing Production Plan for 2022-2026* relies on a variety of data sources, such as the U.S. Census Bureau, the U.S. Department of Housing and Urban Development (HUD), the U.S. Department of Health and Human Services (HHS), the Massachusetts Department of Transportation (MassDOT), the Department of Housing and Community Development (DHCD), and the Northern Middlesex Council of Governments (NMCOG). The two main survey tools used are the U.S. Decennial Census and the American Community Survey (ACS) from the U.S. Census Bureau.

¹⁰ The 2020 U.S. Decennial Census counted 8,565 occupied housing units and 672 vacant housing units, but this includes vacant seasonal/occasional units, which will not be included in DHCD’s calculations. The number of vacant year-round units will be released in the Demographic Profile tentatively in 2022, which is expected to be slightly smaller than the total housing units. DHCD will release a new 10% goal after this data is released.

It is important to note that differences in sampling methodology, terminology, and timeframe can make it difficult to compare one source to another. For instance, one key difference between the U.S. Decennial Census and the ACS is that the Census surveys 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 Decennial Census. More accurate household numbers are available through the Decennial Census, because it samples everyone in a community. However, ACS numbers still have 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 or 2020 Decennial Census.

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

Furthermore, there are differences in questions and terminology across the Decennial 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 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.

In general, this report uses Decennial Census data whenever possible. However, at the time of writing this report, only the redistricting dataset from the 2020 Decennial Census was available, which includes total population, household occupancy status, race, ethnicity, and group quarters population by census tract. In cases in which relevant data was not included in the redistricting dataset from the 2020 Decennial Census, 2015-19 ACS data was used instead.

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:¹¹

Housing Unit – A housing unit may be a house, an apartment, a mobile home, a group of rooms or a single room that is occupied (or, if vacant, intended for occupancy) as separate living quarters. Separate living quarters are those in which the occupants live separately from any other individuals in the building and which have direct access from outside the building or through a common hall. For vacant units, the criteria of separateness and direct access are

¹¹ "American Community Survey and Puerto Rico Community Survey 2019 Subject Definitions," U.S. Census Bureau, 2019.

applied to the intended occupants whenever possible. If that information cannot be obtained, the criteria are applied to the previous occupants.

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

Family – A family consists of a householder and one or more other people living in the same household who are related to the householder by birth, marriage, or adoption. All people in a household who are related to the householder are regarded as members of his or her family. A family household may contain people not related to the householder, but those people are not included as part of the householder's family in tabulations.

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

The *Westford Housing Production Plan for 2022-2026* utilizes population and household projections prepared by the Massachusetts Department of Transportation (MassDOT) and the UMass Donahue Institute with input from NMCOG. MassDOT developed these population and household projections for the Greater Lowell region for 2020, 2030, and 2040. These projections are based upon a statewide model that assigns a specific share of population to each Metropolitan Planning Organization (MPO) region and then to the individual communities. NMCOG staff provided comments on the draft projections and the final projections were adjusted in response to those comments. This report utilizes projections made before the 2020 U.S. Census because the updated projections are not anticipated until 2022.

II. Comprehensive Needs Assessment

A. Demographic Analysis

This section provides an overview of the demographic changes that have occurred in Westford in the last decade, especially since the publication of the *Westford Housing Production Plan for 2017-2021*. It includes analyses of population, households, age cohorts, race and ethnicity, disability status, and income. The purpose of these analyses is to understand how the population characteristics have changed over the past decade and project future growth rates. The data forms the foundation for the Housing Needs section and will be used to frame the goals and strategies contained within the HPP.

1. Population

During the past seventy years, the population of the Town of Westford has grown faster than the region as a whole. According to the *Regional Strategic Plan for Greater Lowell (2011)*, the population in the Greater Lowell region grew by 70% between 1960 and 2010 from 169,403 to 286,901. During the same period of time, Westford’s population increased from 6,261 residents in 1960 to 21,951 residents in 2010, or by 250.6%.

As reflected in Table 1 below, Westford’s growth rate decreased from 26% between 1990 and 2000 to 5.8% between 2000 and 2010. In both Westford and the Greater Lowell region, growth picked up again between 2010 and 2020. Westford grew by 12.3%, while the region grew slower at 8.1%. This results in Westford now comprising 7.9% of the region’s population. Notably, Westford and the region grew more during this time than MassDOT/UMass Donahue Institute had previously projected.

The population projections developed for MassDOT with input from NMCOG predict that growth in both Westford and the region would taper in the 2020s and reverse in the 2030s. They project that Westford's relative drop in population (-7.3%) will be greater than the region's drop (-4.9%). Updated projections will not be available until 2022.

Table 1: Actual and Projected Population (2000–2040)

Year	Westford	Growth Rate	Greater Lowell region	Growth Rate	Westford population as a Percent of Region
2000	20,754	26.0%	281,225	6.7%	7.4%
2010	21,951	5.8%	286,901	2.0%	7.7%
2020	24,643	12.3%	310,009	8.1%	7.9%
2030*	23,788	-3.5%	298,889	-3.6%	8.0%
2040*	22,873	-3.8%	295,041	-1.3%	7.8%

Source: U.S. Census Bureau, 2000, 2010, and 2020 Decennial Census. * Indicates projections developed by MassDOT and UMass Donahue Institute with input from NMCOG

2. Households and Household Types

Similar to the population projections, MassDOT/UMass Donahue Institute developed household projections with input from NMCOG as part of the long-range transportation planning process. As the 2020 redistricting data does not include counts of households, Table 2 below utilizes MassDOT projections for 2020 as well as 2030 and 2040. The 2015-19 American Community Survey, which was the most recent estimate of households by the U.S. Census Bureau, estimates there were 8,571 households in Westford, below the 2020 MassDOT projection of 9,042. However, the 2019 1-year American Community Survey data estimated 9,023 households, very close to MassDOT's projection. This one-year data has a larger margin of error but represents an estimate for the year of 2019 rather than a "rolling average" of the previous five years. It will be beneficial to analyze the full 2020 Census data when it is released tentatively in 2022.

The number of households is projected to increase from 7,498 households in 2010 to 9,704 households in 2030, then declining to 9,480 in 2040. This represents an overall growth of 26.4% between 2010 and 2040. For the same time period, the Greater Lowell household growth rate is projected to be 18.0%, approximately two-thirds of Westford's household growth rate. Westford's share of the region's households is projected to increase from 7.2% in 2010 to 7.7% in 2040.

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

Year	Westford	Growth Rate	Greater Lowell region	Growth Rate	Westford Households as a Percent of the Region
2000	6,808	28.2%	99,342	10.5%	6.9%
2010	7,498	10.1%	104,022	4.7%	7.2%
2020*	9,042	20.6%	116,271	11.8%	7.8%
2030*	9,704	7.3%	121,559	4.5%	8.0%
2040*	9,480	-2.3%	122,740	1.0%	7.7%

Source: U.S. Census Bureau, 2000 and 2010 Decennial Census. * Indicates projections developed by MassDOT and UMass Donahue Institute with input from NMCOG.

Households are divided into two "types": family and nonfamily. In a family household, those who occupy a housing unit are related by birth, marriage or adoption, whereas in a nonfamily household, those who occupy a housing unit are not related (e.g. roommates). According to the 2010 U.S. Decennial Census, 82.2% of the 7,498 households in Westford were family households, as outlined in Table 3 below. The percentage of nonfamily households increased to 19.5% by 2015-19 according to ACS data.

Table 3: Household Types (2010, 2010-14, and 2015-19)

Household Type	2010		2010-2014		2015-2019	
	Number	%	Number	%	Number	%
Family households	6,165	82.2%	6,450	83.3%	6,897	80.5%
Nonfamily households	1,333	17.8%	1,288	16.7%	1,674	19.5%

Source: U.S. Census Bureau, 2010 Decennial Census and 2010-2014 and 2015-2019 American Community Survey.

3. Age Distribution

The U.S. Census also provides information on the age of head of households, broken out into three categories: 34 years and under, 35-64 years old, and 65 years and older.

According to both the 2000 and 2010 U.S. Decennial Census, the majority of heads of households in both family and nonfamily households were between 35 and 64 years of age. As outlined in Table 4 and Figure 1, 78.1% of head of households in family households and 63.7% of head of households in nonfamily households were 35-64 years of age in 2000. However, by 2010, heads of households aged 65 years and older for family households increased significantly, and for nonfamily households heads of households aged 65+ nearly doubled from 21.5% in 2000 to 35.8% in 2010. This reflects the aging population in Westford.

Between 2010-14 and 2015-19, the trend of growth of heads of households aged 65 years and older as a proportion of the population continued, but a different trend reversed: households with heads of household 34 years and under, both family and nonfamily, stopped declining and *also* outpaced growth of households with a head of household 35-64 years of age. This may represent the impact of recent new housing opportunities in Westford for a growing number of households just starting out, and it highlights a continued need for "starter" homes to allow young people to stay in Westford as they start families. It may also reflect the desirability of the community for young families due to the quality of the school system.

Table 4: Head of Household Age Distribution (2000, 2010, 2010-2014, and 2015-2019)

Household Type	2000		2010		2010-2014		2015-2019	
	Number	%	Number	%	Number	%	Number	%
Family households								
34 Years and Under	726	12.5%	347	5.6%	436	6.8%	561	8.1%
35-64 Years Old	4,546	78.1%	4,990	80.9%	5,074	78.7%	5,189	75.2%
65 Years and Older	552	9.5%	828	13.4%	940	14.6%	1,147	16.6%
Total	5,824	100.1%	6,165	99.9%	6,450	100.0%	6,897	100.0%
Nonfamily households								
34 Years and Under	135	14.8%	143	10.7%	101	7.8%	195	11.6%
35-64 Years Old	581	63.7%	713	53.5%	680	52.8%	800	47.8%
65 Years and Older	196	21.5%	477	35.8%	507	39.4%	679	40.6%
Total	912	100.0%	1,333	100.0%	1,288	100.0%	1,674	100.0%
Total Households	6,736	100.0%	7,498	100.0%	7,738	100.0%	8,571	100.0%

Source: U.S. Census Bureau, 2000 and 2010 Decennial Census and 2010-2014 and 2015-2019 American Community Survey. Due to rounding, the total may not equal 100%.

Figure 1: Head of Household Age Distribution, All Households (2000, 2010, 2010-2014, 2015-2019)

Source: U.S. Census Bureau, 2000 and 2010 Decennial Census and 2010-2014 and 2015-2019 American Community Survey.

4. Household Size

Household size is another important factor when assessing the housing needs in a community. Table 5 outlines the household sizes of family and nonfamily households, according to the 2010 U.S. Census, the 2009-14 ACS, and the 2015-19 ACS.

In 2015-19, family households comprised 80.5% (6,897) of total households, while nonfamily households comprised the remaining 19.5% (1,674) of total households. Among family households, two-person households were the most prevalent representing 34.1% of total family households. Four-person family households were the second largest household size and type, representing 31% of total family households. Single-person households comprised 85.4% of the total nonfamily household category at 1,429 households. In general, the distribution of household sizes in Westford has not changed significantly since 2010, with a slight trend toward smaller households. The single largest change is the large growth of single-person households from 990 in 2010-14 to 1,429 in 2015-19.

According to the U.S. Decennial Census and the 2015-19 ACS, the average household size has been shrinking since 2000. In 2000, the average household size in Westford was 3.03 persons (3.31 for average Westford family). In 2010, it was 2.93 persons (3.27 for average Westford family). In 2015-19, it had declined to 2.84 persons.

Table 5: Household Size - Family and Nonfamily (2010, 2010-14, and 2015-19)

Household Type	Household Size by Number of People: 2010							Total
	1	2	3	4	5	6	7 +	
Family Household	0	2,034	1,425	1,830	661	166	49	6,165
Percentage	0.0%	33.0%	23.1%	29.7%	10.7%	2.7%	0.8%	82.2%
Nonfamily Household	1,092	217	15	6	2	1	0	1,333
Percentage	81.9%	16.3%	1.1%	0.5%	0.2%	0.1%	0.0%	17.8%
TOTAL	1,092	2,251	1,440	1,836	663	167	45	7,498

Household Type	Household Size by Number of People: 2010-2014							Total
	1	2	3	4	5	6	7 +	
Family Household	0	2,285	1,419	1,934	611	124	77	6,450
Percentage	0.0%	35.4%	22.0%	30.0%	9.5%	1.9%	1.2%	83.4%
Nonfamily Household	990	254	0	44	0	0	0	1,288
Percentage	76.9%	19.7%	0.0%	3.4%	0.0%	0.0%	0.0%	16.6%
TOTAL	990	2,539	1,419	1,978	611	124	45	7,738

Household Type	Household Size by Number of People: 2015-2019							Total
	1	2	3	4	5	6	7 +	
Family Household	0	2,355	1,761	2,137	443	132	69	6,897
Percentage	0.0%	34.1%	25.5%	31.0%	6.4%	1.9%	1.0%	80.5%
Nonfamily Household	1,429	223	0	22	0	0	0	1,674
Percentage	85.4%	13.3%	0.0%	1.3%	0.0%	0.0%	0.0%	19.5%
TOTAL	1,429	2,578	1,761	2,159	443	132	45	8,571

Source: U.S. Census Bureau, 2010 Decennial Census and 2010-2014 and 2015-2019 American Community Survey.

5. Household Characteristics

Household characteristics can provide insight into the diversity of households in a community. Data from the U.S. Decennial Census and the ACS reflect the changes that have taken place in Westford. Notwithstanding the prevalence of traditional married households with children, household types have become increasingly diverse over the past 20 years. The increase in nonfamily households, single-parent households, and married couples without children has contributed to this diversity. Table 6 on the following page shows the various household types in Westford in 2000, 2010, 2010-14, and 2015-2019.

Table 6: Household Characteristics (2000, 2010, 2010-2014, and 2015-2019)

Household Type	2000		2010		2010-2014		2015-2019	
	Number	%	Number	%	Number	%	Number	%
Family Households								
Married - couple	5,191	76.2%	5,438	72.5%	5,742	74.2%	6,164	71.9%
With related children under 18 years	3,009	44.2%	3,396	45.3%	3,637	47.0%	3,690	43.1%
No related children under 18 years	316	4.6%	2,042	27.2%	4,101	53.0%	4,881	56.9%
Male householder, no spouse	171	2.5%	183	2.4%	193	2.5%	265	3.1%
Female householder, no spouse	452	6.6%	544	7.3%	511	6.6%	468	5.5%
Total Family Households	5,806	85.3%	6,165	82.2%	6,446	83.3%	6,897	80.5%
Nonfamily Households								
Householder living alone	796	11.7%	1,092	14.6%	990	12.8%	1,429	16.7%
Householders 65 and older living alone	291	4.3%	444	5.9%	480	6.2%	635	7.4%
Householder living with others	206	3.0%	241	3.2%	302	3.9%	245	2.9%
Total Nonfamily Households	1,002	14.7%	1,333	17.8%	1,292	16.7%	1,674	19.5%
Total Households	6,808	100.0%	7,498	100.0%	7,738	100.0%	8,571	100.0%

Source: U.S. Census Bureau, 2000 and 2010 Decennial Census and 2010-2014 and 2015-2019 American Community Survey.

Although households with married couples have remained the largest household type since 2000 (6,164 households, or 71.9% of total households), the largest and most sustained change has been the switch of a majority of these couples living with related children under 18 years to a majority living with no related children under 18 years. This category might include new married couples without children or new “empty nesters” whose children have moved out of the house. This type of family household has grown from 4.6% of total households (316) in 2000 to over half of total households (56.9% or 4,881) in 2015-19. This is a more than tenfold increase.

Of total households, 19.5% (1,674) were nonfamily households, with the majority living alone. A single person living alone comprised 85.4% of nonfamily households or 16.7% of total households. Of these households, 44.4% are residents 65 and older, continuing a trend of this category—seniors living alone—as a growing share of Westford's households.

Please note that 2015-19 American Community Survey data are estimates averaged over a five-year period. In order to make a true comparison, detailed 2020 Decennial Census data should be used when it is released in 2022. That said, it is clear there has been an overall increase in nontraditional

households (empty nesters, nonfamily households, and people over 65 living alone) that need to be factored in with any housing strategy. Thus, 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 cannot afford to pay market-rate prices. These options will be further explored in the next two sections, Affordable Housing Goals and Strategies and Required Housing Production Plan Implementation Strategies.

6. Age Cohorts

In order to determine how best to meet future housing demand in Westford, it is important to examine age of the population, both currently and over time. Changes in the age composition of a community have significant implications for housing planning. For example, households with young children have different housing needs than empty nest households, and empty nest households may have different needs than those with someone over 65 living alone. Table 7 below illustrates the breakdown of Westford’s population by age cohort in 2010, 2010-2014, and 2015-2019.

Table 7: Age Distribution of Westford Residents (2010, 2010-2014, and 2015-2019)

	2010		2010-2014		2015 - 2019		Percent Change
	Number	Percent	Number	Percent	Number	Percent	2010-2015/19
0-9 years	3,052	13.9%	3,040	13.3%	2,644	10.9%	-13.4%
10-19 years	3,900	17.8%	4,159	18.2%	4,317	17.7%	10.7%
20-24 years	723	3.3%	937	4.1%	1,122	4.6%	55.2%
25-34 years	1,318	6.0%	1,440	6.3%	1,773	7.3%	34.5%
35-44 years	3,296	15.0%	2,948	12.9%	3,280	13.5%	-0.5%
45 - 59 years	6,308	28.7%	6,536	28.6%	6,692	27.5%	6.1%
60-74 years	2,565	11.7%	3,040	13.3%	3,184	13.1%	24.1%
75+ years	789	3.6%	754	3.3%	1,330	5.5%	68.6%
Total Population	21,951	100.0%	22,854	100.0	24,342	100.0%	10.9%

Source: U.S. Census Bureau, 2010 Decennial Census and 2010-2014 and 2015-2019 American Community Survey.

This data shows a decrease in absolute terms among the 0-9 year cohort (408 people or 13.4% decrease), with the 35-44 year cohort nearly steady (16 people or 0.5% decrease). All other cohorts increased, with the 20-24 year cohort increasing most dramatically in relative terms (455 people or 55.2%) and the 60-74 year cohort increasing most in absolute terms (619 people, or 24.1%). Figure 2 provides two pie charts comparing the age distribution of Westford residents in 2010 and 2015-19.

The overall growth trends among the age cohorts is analyzed to determine the need for specific types of housing in the future. With the decline in the 0-9 year cohort and the increase in the cohorts over age 60, particular attention needs to be paid to additional senior and accessible housing. However, it is also apparent that Westford retains and/or attracts young households in the 20-34 year old range, possibly

due to its excellent education system, and those needs must also be addressed as those households mature.

Figure 2: Age Distribution of Westford Residents (2010 and 2015-2019)

Source: U.S. Census Bureau, 2010 Decennial Census and 2015-2019 American Community Survey.

With input from NMCOG, MassDOT and UMass Donahue Institute developed population projections in 2016 for Westford for five-year increments through 2040, shown in Table 8. Westford’s total population is estimated to decrease by 3.8% between 2025 and 2040. To determine the projected age distribution of Westford’s future residents, NMCOG used available data on age cohort breakdowns from *Metro Future* (the Greater Boston Region’s 30-year plan for 2000-2030) and then applied them to the MassDOT projections. This data provides a useful indication of the future age distribution of Westford residents.

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

Age Groups	2025		2030		2035		2040		Percent Change 2025 - 2040
	Number	%	Number	%	Number	%	Number	%	
0-9 years	2,353	9.9%	2,563	10.8%	2,520	10.6%	2,187	9.6%	-7.0%
10-19 years	2,557	10.8%	2,278	9.6%	2,475	10.4%	2,642	11.6%	3.3%
20-24 years	908	3.8%	639	2.7%	474	2.0%	498	2.2%	-45.2%
25-39 years	3,796	16.0%	3,928	16.5%	3,734	15.8%	3,070	13.4%	-19.1%
40-59 years	6,557	27.6%	6,014	25.3%	6,168	26.0%	6,752	29.5%	3.0%
60-74 years	5,465	23.0%	5,716	24.0%	5,056	21.3%	3,899	17.0%	-28.7%
75+ years	2,144	9.0%	2,640	11.1%	3,271	13.8%	3,825	16.7%	78.4%
Total Population	23,781	100.0%	23,778	100.0%	23,698	100.0%	22,873	100.0%	-3.8%

Source: Projections developed by MassDOT and UMass Donahue Institute with input from NMCOG

The projected age distribution of Westford residents reflects the decline in the 20-24 (-45.2%), 60-74 (-28.7%), 25-39 (-19.1%), and 0-9 (-7.0%) age cohorts and the large increase (78.4%) in the 75+ population. Note that new projections are anticipated in 2022 that would reflect the change of growth patterns the region experienced in 2010-2020. That said, projected changes in the age cohorts will have an impact upon the housing needs of the community. The decline in the middle age cohorts and the increase in the elderly populations should be addressed. In addition to a general need for more housing units to accommodate new and established families, special attention will need to be paid to the housing needs of seniors, with more than one-fifth (21.1%) of the population estimated to be over 60 years old in 2040. This Housing Production Plan considers these unique needs as it lays out a guiding framework for housing production in Westford over the next five years.

7. School Enrollment and Projections

The Westford Public Schools provided information on their school enrollment and projections. Figure 3 illustrates the total public school enrollment between 2016/17 and 2020/21. While some preschool and school-aged children (0-19 years old) attend private, charter, and parochial schools, the vast majority of Westford children enroll in the public school system. Over those five years, enrollment dropped 6.8% (342 students). The largest drop was in grades 6-8, a decrease of 13.5% (176 students). Grades K-5 dropped by 6.5% and grades 9-12 dropped by 2.1%.

Figure 3: Westford Public School Enrollment (2016/2017 to 2020/2021)

Source: Superintendent of Schools, Westford Public School Dept.

The previous Housing Production Plan included enrollment projections through 2025/26 developed by the Westford School Department. The 2020/21 projections developed at that time proved to be very accurate, only 1.3% off of the overall enrollment number, varying from underprojecting by 1.6% to overprojecting by 4.9% for individual cohorts. The 2021/22 projection is provided in Figure 4. Pre-K – Grade 5 enrollment is expected to fall by 909, Grades 6-8 is expected to fall by 90, and Grades 9-12 is anticipated to fall by 87.

Figure 4: Westford Public School Projections (2021/2022)

Source: Superintendent of Schools, Westford Public School Dept.

8. Race and Ethnicity

Table 9 breaks down the Town’s population by race and ethnicity for 2000, 2010, and 2020. According to the 2020 U.S. Decennial Census, the population identifying as white decreased by 9.2% over the last 20 years, while nearly every other racial/ethnic category increased significantly. The population identifying as Black or African-American nearly tripled, while the population identifying as Asian alone more than quadrupled—4,285 individuals, the largest increase in absolute terms. The Hispanic or Latino population in Westford increased by 176.4% (404 individuals). The largest increase in relative (percentage) terms were people who identified as two or more races (503.8% or 1,199 individuals). These changes could be driven both by changes in the way residents self-identify and diversification of race and ethnicity in Westford.

Table 9: Racial and Ethnic Diversity of Residents (2000, 2010, and 2020)

Racial/Ethnic Category	2000		2010		2020		Percent Change 2000-2020
	Population	Percent	Population	Percent	Population	Percent	
White Alone	19,444	93.7%	18,678	85.1%	17,664	71.7%	-9.2%
Black or African American Alone	62	0.3%	83	0.4%	230	0.9%	271.0%
American Indian and Alaska Native Alone	13	0.1%	18	0.1%	30	0.1%	130.8%
Asian Alone	994	4.8%	2,762	12.6%	5,279	21.4%	431.1%
Native Hawaiian and Other Pacific Islander Alone	3	0.0%	1	0.0%	3	0.0%	0.0%
Some Other Race and Two or More Races Alone	238	1.1%	409	1.9%	1,437	5.8%	503.8%
Total Population	20,754	100%	21,951	100%	24,643	100%	18.7%
Hispanic or Latino (All races)	229	1.1%	333	1.5%	633	2.6%	176.4%

9. Residents with Disabilities

Table 10 provides information about the community with disabilities in Westford as of 2015-19. An estimated 1,817 residents, approximately 7.5% of total estimated population at that time, were reported to have a disability. Approximately 44% of these individuals were between the ages of 18 and 64, and 46.9% were 65 or older. Hearing difficulty was the most prevalent disability (828 or 3.4% of total residents). People with disabilities grew as a share of the population *and* in absolute numbers since 2010-14, when 1,318 residents were reported with at least one disability status (an increase of 37.9% or 499 residents).

Residents with disabilities often have unique housing needs in terms of the physical design and/or accessibility of their homes, access to services, and the cost relative to a fixed or limited income. For these reasons, a comprehensive affordable housing plan should be sensitive to the specific needs of the community with disabilities and incorporate their needs into the goals and strategies for future affordable housing production.

Table 10: Characteristics of the Community with Disabilities in Westford (2015-2019)

Age Group and Disability Status	Total Number	Percent of Total Residents
Under 5 years old	0	0.0%
5-17 years old	162	0.7%
18-64 years old	802	3.3%
65+ years old	853	3.5%
Total Number of Residents with a Disability	1,817	7.5%
With a hearing difficulty (all ages)	828	3.4%
With a vision difficulty (all ages)	376	1.5%
With a cognitive difficulty (all ages)	669	2.7%
With an ambulatory difficulty (all ages)	690	2.8%
With a self-care difficulty (all ages)	309	1.3%
With an independent living difficulty (all ages)	560	2.3%

Source: U.S. Census Bureau, 2015-2019 American Community Survey. Residents may report more than one disability.

10. Household, Family, and Per Capita Income

Since 2000, Westford has seen a significant increase in its median household, median family, and per capita incomes. The 2000 U.S. Decennial Census provided 1999 income figures for each community. However, the 2010 U.S. Decennial Census did not include any income data. Instead, the American Community Survey (ACS) started producing this income data based upon an annual survey. As mentioned in the introduction, this report uses five-year ACS data. Five-year data has a lower margin of

error than one-year data, but it represents a five-year average rather than a point in time. Because of its margin of error and this “averaging”, the data is not fully comparable.

a. Median Household Income

The U.S. Census Bureau calculates median household income based on the income of the householder and all other individuals 15 years old and over in the household. Table 11 shows the change in median household income between 1999 and 2015-19 for Westford, the Greater Lowell region, the Commonwealth of Massachusetts, and the United States.

Westford’s median household income increased by 47.5% between 1999 and 2015-2019, which is lower growth than Massachusetts (60.8%), the Greater Lowell region (55.8%), and the United States (49.8%). However, the median household income in Westford started significantly higher than the other three areas, and the increase in median household income in absolute terms (\$46,645) was more than the other three areas.

It is important to adjust these values for inflation so a more accurate comparison can be made. According to the Bureau of Labor Statistics (BLS) Inflation Rate Calculator, one dollar in April 1999 has the same buying power as \$1.5376 in April 2019 dollars (chosen because the 2015-19 ACS reports in 2019 dollars). 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.

Adjusting the 1999 median household incomes for inflation, Westford’s median household income did not keep pace with inflation, decreasing by 4.1%. This represents a partial recovery from the inflation-adjusted decline between 1999 and 2010-14 when Westford and the nation were recovering from the Great Recession.

Table 11: Median Household Income (1999, 2010-2014 and 2015-2019)

Geographic Area	1999	2010-2014	2015-2019	Percentage Increase 1999-2015/2019	% Inflation Adjusted Increase 1999-2015/19
Westford	\$98,272	\$125,143	\$144,917	47.5%	-4.1%
Greater Lowell Region	\$58,472	\$76,982	\$91,112	55.8%	1.3%
Massachusetts	\$50,502	\$67,846	\$81,215	60.8%	4.6%
United States	\$41,944	\$53,482	\$62,843	49.8%	-2.6%

Source: U.S. Census Bureau, 2000 Decennial Census and 2010-2014 and 2015-2019 American Community Survey.

Figure 5: Median Household Income (1999 and 2015-2019)

Source: U.S. Census Bureau, 2000 Decennial Census and 2015-2019 American Community Survey.

b. Median Family Income

Median family income is similar to median household income, calculated based on the income of the householder and all other individuals 15 years old and over in the household. However, it is limited to households identified as families, i.e., related by birth, marriage, or adoption. Family income is often greater than median household income because a household can consist of a single individual, whereas family income always consists of two or more individuals. Since 1999, median family incomes have increased in Westford, the Greater Lowell region, Massachusetts, and the United States (Figure 6).

As shown below in Table 12, Westford’s median family income has been consistently higher than the Greater Lowell region, Massachusetts, and the United States. Its growth between 1999 and 2015-19 was 54.8%, above the median of the United States (54.4%) but below Greater Lowell region (62.2%) and Massachusetts (67.2%). The median family income in Westford is still well above the surrounding region and more than double the United States. Adjusting the 1999 median family incomes for inflation, Westford’s median family income roughly held steady, increasing by 0.7%.. This represents a reverse from the inflation-adjusted decline between 1999 and 2010-14.

Table 12: Median Family Income (1999, 2010-2014, and 2015-2019)

Geographic Area	1999	2010-2014	2015-2019	Percentage Increase 1999-2015/2019	% Inflation Adjusted Increase 1999-2015/19
Westford	\$104,029	\$144,194	\$161,024	54.8%	0.7%
Greater Lowell Region	\$67,583	\$93,351	\$109,629	62.2%	5.5%
Massachusetts	\$61,664	\$86,132	\$103,126	67.2%	8.8%
United States	\$50,046	\$65,433	\$77,263	54.4%	0.4%

Source: U.S. Census Bureau, 2000 Decennial Census and 2010-2014 and 2015-2019 American Community Survey.

Figure 6: Median Family Income (1999 and 2015-2019)

Source: U.S. Census Bureau, 2000 Decennial Census and 2015-2019 American Community Survey.

c. Per Capita Income

The U.S. Census Bureau defines per capita income as the average income received in the past 12 months for every person 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 data is not collected for people under 15 years old even though those people are included in the denominator of per capita income.

Table 13 and Figure 7 show the changes in per capita income between 1999 and 2015-19 in Westford, the Greater Lowell region, Massachusetts, and the United States. In 1999, Westford’s per capita income was \$37,979 – higher than the region, state, and country. In 2015-19, the Town’s per capita income was \$56,057, representing a 47.5% increase. As with the median household income, this increase was lower than the other three areas even though it was highest in absolute (dollar) terms. When adjusted for inflation, Westford did not keep pace with inflation (4.0% decline). As with the other income measures, this is a partial recovery from the larger inflation-adjusted decline measured in 2010-14.

Table 13: Per Capita Income for Selected Geographies (1999, 2010-2014, and 2015-2019)

Geographic Area	1999	2010-2014	2015-2019	Percentage Increase 1999-2015/2019	% Inflation Adjusted Increase 1999-2015/19
Westford	\$37,979	\$49,168	\$56,057	47.6%	-4.0%
Greater Lowell Region	\$24,081	\$33,942	\$35,999	49.5%	-2.8%
Massachusetts	\$25,952	\$36,441	\$43,761	68.6%	9.7%
United States	\$21,587	\$28,555	\$34,103	58.0%	2.7%

Source: U.S. Census Bureau, 2000 Decennial Census and 2010-2014 and 2015-2019 American Community Survey.

Figure 7: Per Capita Income for Selected Geographies (1999 and 2015-2019)

Source: U.S. Census Bureau, 2000 Decennial Census and 2015-2019 American Community Survey.

d. Income Distribution

While median household and median family incomes are valuable indicators, they do not account for the distribution of household incomes in a community. Table 14 describes the changes in household income distribution in Westford between 1999 and 2015-19. In 1999, approximately 3,482 households (50.9%) earned less than the median household income of \$98,272, with 19.5% earning less than \$50,000 per year. Of the 49.1% of households earning more than the median household income, 39.2% earned between \$100,000 and \$199,999, and 9.9% of all households earned \$200,000 or more per year.

Between 1999 and 2010-14, Westford saw an increase in the number of households in the income categories above \$100,000. The number of households in all other categories declined both in absolute numbers and as a share of the population.

Between 2010-14 and 2015-19, the number of households in the \$200,000 or more category continued to increase significantly, but it was accompanied by an increase in number of households in categories between \$15,000 and \$34,999. This aligns with the demographic trends of Westford's increase in younger adults and non-traditional households in the same time period. The number of households in the middle-income categories between \$35,000 and \$99,999 continued to shrink.

Ultimately, between 1999 and 2015-19, the largest change in both percent and absolute terms were the number of households in the \$200,000 or more category (270% or 1,820 households.) The largest category is still \$100,000-\$199,999 at 37.9% of households (3,257 households). An estimated 223 households make less than \$15,000 (2.6% of households).

Table 14: Household Income Distribution (1999, 2010-2014, and 2015-2019)

	1999 Households		2010-2014 Households		2015-2019 Households		Percent Change 1999-2015/19
	Number	Percent	Number	Percent	Number	Percent	
Less than \$15,000	278	4.1%	218	2.8%	223	2.6%	-19.8%
\$15,000 - \$24,999	234	3.4%	202	2.6%	360	4.2%	53.8%
\$25,000 - 34,999	277	4.1%	255	3.3%	351	4.1%	26.7%
\$35,000 - \$49,999	546	8.0%	367	4.7%	351	4.1%	-35.7%
\$50,000 - \$74,999	936	13.7%	828	10.7%	754	8.8%	-19.4%
\$75,000 - \$99,999	1,211	17.7%	916	11.8%	797	9.3%	-34.2%
\$100,000 - \$199,999	2,680	39.2%	3,325	43.0%	3,257	37.9%	21.5%
\$200,000 or more	674	9.9%	1,627	21.0%	2,494	29.0%	270.0%
Total	6,836	100.0%	7,738	99.9%	8,587	100.0%	25.6%

Source: U.S. Census Bureau, 2000 Decennial Census and 2010-2014 and 2015-2019 American Community Survey.

e. Area Median Income (AMI)

Affordable housing requirements base a household’s eligibility for income restricted units on a series of income thresholds. HUD defines these thresholds as percentages of Area Median Income (AMI), which is defined in the Data Sources and Definitions section. Housing assistance payments are limited by Fair Market Rent (FMR) thresholds established by HUD for different areas. FMRs are gross rent estimates that include both shelter rent paid by the tenant to the landlord and the cost of utilities, excluding telephone. HUD sets FMRs to ensure that a sufficient supply of rental housing is available to program participants. Westford is included in the Lowell Metropolitan Fair Market Rent region.

AMI thresholds are often capped at 80%, 60%, 50%, and 30% of AMI, but vary depending on the number of individuals in the household. Policymakers often refer to households earning 61-80%, 51-60%, 31-50%, and at or below 30% of AMI as “moderate income”, “low income”, “very low income”, and “extremely low income”, respectively. These percentages are used to determine who can access income-restricted units, including Chapter 40B, Housing Choice Voucher Program (Section 8), and Low Income Housing Tax Credit units. As shown in Table 15, the AMI for the Lowell Metro FMR Area for FY 2021 was \$112,900.

Table 15: Adjusted Income Limits by Household Size, Lowell Metro FMR Area, FY 2021

Area Median Income	FY 2021 Income Limit Category	Household Size (Number of People)							
		1	2	3	4	5	6	7	8
\$112,900	30%- Extremely Low	\$23,700	\$27,100	\$30,500	\$33,850	\$36,600	\$39,300	\$42,000	\$44,700
	50% - Very Low	\$39,550	\$45,200	\$50,850	\$56,450	\$61,000	\$65,500	\$70,000	\$74,550
	80% - Low	\$55,950	\$63,950	\$71,950	\$78,900	\$86,300	\$92,700	\$99,100	\$105,500

Source: U.S. Department of Housing and Urban Development, April 2021. Westford is included in the Lowell Metropolitan Fair Market Rent (FMR) region.

Although no data set exists which breaks income down by household size, some general conclusions can be made about Westford households' eligibility for affordable housing. Using the income limits for a household of three compared to the income distribution for Westford households, the following income categories and associated HUD Lowell Metro FMR thresholds were developed and are reflected in Table 16 and Figure 8 on the next page. As outlined in Table 15, the income limits for a three-person household were set at \$30,500 (30% AMI), \$50,850 (50% AMI), and \$71,950 (80% AMI). Please note these are approximations, as the 2015-19 ACS represents an average over the years of 2015-2019 and the HUD Threshold is recalculated every fiscal year.

Table 16: Income Categories and Associated Lowell Metro FMR Area Thresholds

	2015-2019		HUD Threshold
	Number	Percent	
Less than \$15,000	223	2.6%	Extremely Low Income
\$15,000 - \$24,999	360	4.2%	Extremely Low Income
\$25,000 - 34,999	351	4.1%	Very Low Income
\$35,000 - \$49,999	351	4.1%	Low Income
\$50,000 - \$74,999	754	8.8%	Moderate Income
\$75,000 - \$99,999	797	9.3%	Median Income
\$100,000 - \$199,999	3,257	37.9%	Above AMI
\$200,000 or more	2,494	29.0%	Above AMI
Total	8,587	100.0%	

Source: U.S. Census Bureau, 2015-2019 American Community Survey and NMCOC analysis.

Figure 8: Estimated Westford Households in each AMI Category (2015-2019)

Source: U.S. Census Bureau, 2015-2019 American Community Survey, and NMCOC analysis.

11. Residents Living in Poverty

Every year, the U.S. Census Bureau establishes a set of “Poverty Thresholds” to estimate the population’s poverty levels. They use a complex formula varying by family size and composition to determine who is living in poverty as part of the ACS. The U.S. Department of Health and Human Resources (HHS) uses the “Federal Poverty Guidelines”, which are a simplified version of the census thresholds to determine eligibility for programs such as food assistance.

For the purpose of the ACS, if a family’s total income is less than the threshold, then that family and every individual in it is considered to be living under poverty. The official poverty thresholds do not vary geographically, but they are updated for inflation using the Consumer Price Index (CPI-U). The official poverty definition uses money income before taxes and does not include capital gains or noncash benefits (such as public housing, Medicaid, and food assistance).

Table 17 displays the 2019 poverty guidelines, but the ACS data displayed in Table 18 on the next page and Figure 9 uses the more complex “Poverty Threshold” calculation. According to the 2015-19 ACS, 500 Westford residents (approximately 2.1% of total population) were classified as living under poverty. This is a slightly smaller number than the 2010-14 ACS (625 residents or 2.7% of the Town’s population).

Figure 9: Age of Residents Living in Poverty: 2015-2019

Source: U.S. Census Bureau, 2015-2019 American Community Survey.

As shown on Table 18, residents under age 18 represented roughly 19% of the population living in poverty in Westford. Individuals aged 65 and older represented 27.4% of the residents living in poverty.

Table 17: Federal Poverty Level Guidelines for 2019

Number of Persons in Family	Poverty Guideline
1	\$12,490
2	\$16,910
3	\$21,330
4	\$25,750
5	\$30,170
6	\$34,590
7	\$39,010
8	\$43,430
For each additional person	\$4,420

Source: Poverty guidelines updated periodically in the Federal Register by the U.S. Department of Health and Human Services under the authority of 42 U.S.C. 9902(2), <https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines/prior-hhs-poverty-guidelines-federal-register-references/2019-poverty-guidelines>

Women comprised 53.4% of the population living in poverty, while men comprised the remaining 46.6%. The largest groups were those aged 45 to 54 years (24.6%) and those over 75 years (21.8%). It will be important to recognize these particularly large age cohorts living in poverty that will continue to age—alongside younger people and families—when prioritizing housing types that will meet the diverse needs of an aging population.

Table 18: Characteristics of the Population Living in Poverty (2015-2019)

	Number Below Poverty Level	Percent of those in poverty
Age		
5 Years and under	0	0.0%
6 to 11 Years	27	5.4%
12 to 17 Years	68	13.6%
18 to 24 Years	53	10.6%
25 to 34 Years	28	5.6%
35 to 44 Years	20	4.0%
45 to 54 Years	123	24.6%
55 to 64 Years	44	8.8%
65 to 74 Years	28	5.6%
75 Years and Over	109	21.8%
Total Individuals Living in Poverty	500	100.0%
Sex		
Male	233	46.6%
Female	267	53.4%
Total Individuals Living in Poverty	500	100.0%
Total Westford Population	24,342	

Source: U.S. Census Bureau, 2015-2019 American Community Survey.

B. Existing Housing Inventory Analysis

This section examines the characteristics of the current housing inventory and local housing market in Westford. An analysis of housing types and home values is offered, followed by an examination of development and sales trends. Following that is an analysis of housing affordability, which includes a survey of current property and rental listings.

1. Housing Units and Types

Table 19 illustrates the total number of housing units by housing type for 2000 through 2015-19. In 2000, there were 6,941 housing units in Westford. One-unit (detached and attached) homes represented the largest percentage of homes, accounting for 92.7% of all housing units. Two-family homes accounted for an additional 2.7%, while multi-family dwellings comprised of three or more units accounted for 4.4%. While the 2000 U.S. Census indicates that there were 22 mobile homes or other housing units, the Town has no record of any mobile homes at that time.

Between 2000 and 2010-14, the Town’s housing inventory had grown by 1,288 units. By 2015-19, it had grown by an additional 623 units. This represents a 27.5% (1,911 unit) increase between 2000 and 2015-19. Excluding “Mobile Home or other”, which were possibly miscategorized by the ACS, the number of units of all types have increased except 2-unit (duplex) structures. Most of these new units were 1-unit detached structures (1,053 units, an increase of 17.1%). The second-most prevalent type of unit built were 1-unit attached structures (419 units, an increase of 154%). Although the number of units built in structures of 20 or more units had the greatest relative percentage increase at 1883.3%, it is in third place in absolute terms (339 units).

Notably, the share of new 1-unit detached units being built since 2010-14 has significantly decreased. During that time period, more units in the “1-unit attached” and “20 or more units” categories were added than the 1-unit detached category. In fact, more units in “1-unit attached” and “20 or more units” categories were built in the roughly five years between 2010-14 and 2015-19 than in the roughly twelve years between 2000 and 2010-14. This represents a recent diversification of Westford’s housing inventory.

Table 19: Total Number of Housing Units (2000, 2010-2014, and 2015-2019)

Housing Units per Structure	2000		2010-2014		2015 - 2019		Percent Change
	Number	Percent	Number	Percent	Number	Percent	2000 – 2015/19
1-unit, detached	6,161	88.8%	7,091	86.2%	7,214	81.5%	17.1%
1-unit, attached	272	3.9%	463	5.6%	691	7.8%	154.0%
2 units	184	2.7%	143	1.7%	99	1.1%	-46.2%
3 to 19 units	284	4.1%	342	4.2%	463	5.2%	63.0%
20 or more units	18	0.3%	140	1.7%	357	4.0%	1883.3%
Mobile Home or other	22	0.3%	50	0.6%	28	0.3%	27.3%
Total	6,941	100.0%	8,229	100.0	8,852	100.0%	27.5%

Source: U.S. Census Bureau, 2000 Decennial Census and 2010-2014 and 2015-2019 American Community Survey.

2. Housing Tenure

Housing tenure is a description of ownership (owner or rental). Table 20 illustrates housing tenure figures from 2000 through 2015-19.

In 2000, the Westford housing inventory consisted of 6,258 (91.9%) owner-occupied and 550 (8.1%) renter-occupied households. Between 2000 and 2010-14, units were added to both categories in roughly proportional amounts. In other words, the relative breakdown of owner-occupied and renter-occupied units remained the same.

This changed between 2010-14 and 2015-19, as 551 renter-occupied units were added compared to 282 new owner-occupied units during that time. Because the number of renter-occupied units grew faster than owner-occupied units, the 2015-19 breakdown was 86.2% owner-occupied units (7,384 units) and 13.8% renter-occupied units (1,187 units).

Table 20: Housing Tenure (2000, 2010-2014, and 2015-19)

	2000		2010-2014		2015 - 2019		Percent Change 2000 - 2019
	Number	Percent	Number	Percent	Number	Percent	
Owner Occupied	6,258	91.9%	7,102	91.9%	7,384	86.2%	18.0%
Renter Occupied	550	8.1%	636	8.2%	1,187	13.8%	115.8%
Total Occupied Housing Units	6,808	100.0%	7,738	100.1	8,571	100.0%	25.9%

Source: U.S. Census Bureau, 2000 Decennial Census and 2010-2014 and 2015-2019 American Community Survey.

3. New Residential Development

Based upon residential building permit data in Westford from January 1, 2016 to December 31, 2020 (roughly the period since the previous HPP's approval), an estimated 196 residential permits were issued for 696 new housing units as shown in Figure 10. The year of 2015 is included in the chart for comparison.

Figure 10: Residential Building Permits/Units Issued (2015-2020)

Source: Westford Online Permitting Database.

Table 21 provides more specific information on the estimated number of building permits issued for new year-round residential units, the total new year-round units permitted, the total valuation, and the average valuation per unit for all residential permits issued between 2010 and 2020. During 2010-2015, 682 housing units were permitted. This included over 360 rental units, including 200 units in Princeton Properties projects in 2013. In 2016-2020, fewer permits were issued, but some were for very large projects. The number of units permitted from 2016-20 (696) was more than the five years prior (2011-15, 551). Major developments of 8 or more units from 2015 through 2020 include:

- **Brookside Village:** This condominium development included 14 homes in two-unit buildings and 3 one-unit detached homes.
- **Summer Village at the Pond:** The construction of many seasonal units were permitted in 2015-16 for this development. Because most measures of housing focus on year-round homes, these units were excluded from this analysis.

- **Juniper Hill Subdivision:** This subdivision includes 18 new one-unit detached homes, including 2 affordable/subsidized units by Habitat for Humanity.
- **Sugar Maple Lane:** This development included 21 market-rate one-unit attached homes and 7 subsidized/affordable one-unit attached homes.
- **Abbot Mill Phase 2:** This development included 79 market-rate homes and 23 subsidized homes in a conversion of several mill buildings. However, the subsidized homes were not SHI-eligible.
- **Residences at Westford West:** This development included 240 subsidized/affordable homes in three 80-unit buildings.
- **Two Robbins Road:** This development included 168 homes in two 84-unit buildings and 12 one-unit attached homes. Thirty-six of the units are affordable at 50% AMI, qualifying the entire rental development for the SHI.
- **110 Place:** This development included 16 market-rate one-unit attached homes.
- **Alder Point:** This development included 6 market-rate units and 2 subsidized/affordable units.
- **Balsam Circle:** This development included 17 market-rate, age-restricted (55 and older), one-unit attached and detached homes and one building containing 7 subsidized/affordable, age-restricted (62 and older), one-unit attached supportive housing units.

Most other projects between 2015 and 2020 were one-unit detached home infill projects or projects to raze an existing one-unit detached home and build a new unit in its place.

Years that included major housing projects had much lower average construction value per unit, as the single-family detached home costs were offset by smaller, less expensive condo/apartment homes. Not counting these years, an upward trend seemingly appeared in estimated average construction value per unit from \$230,744 in 2015 to \$284,226 in 2020.

Table 21: New Residential Building Permits/ Units Issued (2010 - 2020)

Year	Total New Residential Building Permits Issued	Total New Units Permitted	Total Construction Value	Average Construction Value Per Unit
2010	82	90	\$18,254,010	\$202,822
2011	81	81	\$16,514,490	\$203,883
2012	103	103	\$24,080,578	\$233,792
2013 ¹²	113	308	\$38,306,687	\$124,372
2014	25	25	\$5,768,610	\$230,744
2015	34	34	\$8,826,580	\$259,605
2016	21	21	\$5,731,000	\$272,905
2017	29	130	\$19,728,260	\$151,756
2018	25	260	\$35,108,796	\$135,034
2019	87	251	\$42,096,415	\$167,715
2020	34	34	\$9,697,700	\$285,226

Source: Westford Online Permitting Database.

¹² Abbot Mill Phase 1 was permitted in 2009, but not completed until 2013. The table reflects this.

4. Housing Market Conditions

This section examines trends in the local housing market in Westford between 2015 and 2020, building upon the analysis that was completed in the *Westford Housing Production Plan for 2017-2021*. It examines the number of home sales, including the recorded sales for residential properties, and the median sales prices. These figures show that Westford has among the highest sales prices in the Greater Lowell region. The Town has recovered from the economic recession and housing downturn in the late 2000s; the major challenge facing Westford now is the lack of housing choices for low- and moderate-income residents. Those issues will be addressed more fully in the next section on Housing Affordability Analysis.

a. Home Sales

As part of the analysis in the *Westford Housing Production Plan for 2022-2026*, the recorded home sales in Westford from 1950 to 2020 were reviewed through the use of the Town Assessor's 2020 Database. As of 2021, more than half of homes in Westford were purchased in the last 11 years. The greatest turnover of owner-occupied homes occurred in 2010-19 (45.8% of homes), followed by 2000-2009 (22.4%) and 1990-1999 (15.3%). This continues a trend observed in the *Westford Housing Production Plan for 2017-2021* in which a growing proportion of Westford homes are purchased in the previous thirty years. Since 2016, the number of longtime homeowners that purchased their house before 1980 shrunk from 6.2% to 3.2%.

Table 22: Recorded Sales for Residential Properties in Westford (1950-2020)

Period	Last Recorded Sale	Percent of Last Recorded Sales
1950-1959	12	0.1%
1960-1969	58	0.7%
1970-1979	197	2.4%
1980-1989	431	5.4%
1990-1999	1234	15.3%
2000-2009	1801	22.4%
2010-2019	3687	45.8%
2020	622	7.7%
Total	8042	100%

Source: Town of Westford GIS parcels and Assessor's database with recorded sales as of March 10, 2021. Includes Assessor's residential use codes 101 through 125 and primarily-residential mixed use codes. Excludes 17 residential parcels with last sale dates between 1900 and 1949.

Data from the Warren Group can provide a more in-depth examination of home sales in Westford in the last ten years. This information is provided in Figure 11. In 2011, single-family home sales in Westford were at 172 units. There was an increase in single-family home sales in 2012 (217 units) and 2013 (273 units) and then a decrease to 210 single-family home sales in 2014. At that point, single-family home sales held relatively steady between 240 and 271 between 2015 and 2019. However, there was a significant increase in sales in 2020 (291 sales).

Condominium sales have followed a similar pattern, but at a much lower level. Condominium sales began at 113 units in 2010, decreased to 74 units in 2011, and then rebounded to 115 units in 2012 and 124 units in 2013. However, this increase in condo sales was not replicated in 2014 (104 units). Condo sales only surpassed 100 in one year twice since then, once in 2016 (111 units), which was offset by a very low year in 2017 (78 units), and once in the 2020 spike in home purchases (127 units). A long-term trend of relatively low condo sales may show that condominiums in Westford are a premium commodity and do not come up on the market often. Pricing trends for condominiums shown in Figure 12 support such a theory.

Figure 11: Home Sales in Westford (2011-2020)

Source: Warren Group 2020.

b. Median Sales Prices

Figure 12 shows the changes in the median selling price of single-family homes and condominiums in Westford between 2011 and 2020. Despite the up and down pattern for single-family homes sales for this period, the median sales price actually increased fairly steadily by 48.7% from \$434,450 in 2011 to \$646,000 in 2020, with a temporary downturn only between 2014 and 2015. Condo prices fluctuated more often, with downturns in 2015 and 2019 and larger changes proportionately between years. However, the overall trend of the increase of condo median prices is greater proportionally than that of single-family homes, with an increase of 55.8% between 2011 (\$282,500) and 2020 (\$440,000).

Figure 12: Median Home Sales Prices in Westford (2011-2020)

Source: Warren Group 2020.

Table 23 compares the median selling prices of single-family homes and condominiums in Westford to the other eight communities in the Greater Lowell region in 2020. Westford had the highest median sales price for both single-family (\$646,000) and condo (\$440,000) sales in 2020. This is 39.1% (\$181,474) over the median sales price for single families in the Greater Lowell region and 49.6% (\$145,967) over the median sales price for condominiums.

Table 23: Comparison of Median Sales Prices in Westford and the Greater Lowell region (2020)

Community	Single Family Sales	Median Sales Price	Condo Sales	Median Sales Price	Total Sales	Median Sales Price
Billerica	401	\$499,900	60	\$323,750	569	\$495,000
Chelmsford	368	\$487,500	182	\$305,250	598	\$440,000
Dracut	293	\$405,000	127	\$241,000	481	\$366,000
Dunstable	33	\$515,000	0	\$0	48	\$501,250
Lowell	512	\$350,000	370	\$230,000	1,225	\$330,000
Pepperell	162	\$415,000	19	\$320,000	228	\$399,500
Tewksbury	322	\$486,050	156	\$347,000	517	\$460,000
Tyngsborough	199	\$465,000	46	\$279,000	221	\$360,000
Westford	291	\$646,000	127	\$440,000	452	\$560,000
Greater Lowell region	2,501	\$464,526	1,087	\$294,033	4,339	\$417,312
Massachusetts	61,486	\$445,950	24,201	\$415,000	107,034	\$435,000

Source: The Warren Group, 2020.

5. Housing Affordability Analysis

For Westford and its neighbors in the Greater Lowell region, “low- or moderate-income” refers to income limits set annually by the U.S. Department of Housing and Urban Development (HUD). The Commonwealth of Massachusetts uses HUD’s income limits to determine eligibility for income-restricted housing developed under Chapter 40B. As a result, most housing called “affordable housing” in federal, state, or local laws, ordinances, and bylaws, is based on a consistent framework. This plan conforms to DHCD’s Chapter 40B regulations and as such the primary focus is on the creation and preservation of housing for people who make low- to moderate-incomes. The following analysis provides a picture of people in Westford who have a cost burden, current rental prices, the affordability gap, and current and potential future units on the Subsidized Housing Inventory in Westford.

a. Housing Burden

Housing cost burden refers to the disparity between housing price (rent or mortgage) and household income. HUD defines housing cost burden as the condition in which households who make a low- to moderate-income spend more than 30% of their monthly gross income on housing. When households spend between 30% to 50% of their income on housing, they are considered to have a moderate housing cost burden. While people that spend more than half of their incomes are considered to have a severe housing cost burden. Table 24 shows the monthly housing costs for homeowners as a percentage of annual household income in 2010-14 and 2015-19. In 2015-19, households paying less than 20% of

their annual household incomes on housing-related costs accounted for approximately 42.2% of households with a mortgage and 69.0% without a mortgage. Households paying between 20% and 29% of their income accounted for 30.3% of households with a mortgage and 11.1% of households without a mortgage.

However, approximately 25.3% of the total owner-occupied households in Westford, or 1,866 households, were considered at least moderately burdened by their housing costs, paying more than 30% of their income for their mortgage or rent. This is an increase from 2010-14 in both absolute and relative terms, when 22.6%, or 1,603 households, were paying more than 30% of their income for mortgage events.

Table 24: Monthly Housing Costs as a Percentage of Annual Household Income (2010-2014 and 2015-2019)

2010-2014	Households in Westford	Less than 20%		20%-29%		30% or more	
		Number	Percent	Number	Percent	Number	Percent
Households with a mortgage	5,433	2,207	40.6%	1,906	35.1%	1,320	24.3%
Households without a mortgage	1,669	1,193	71.5%	241	14.4%	283	13.5%

2015-2019	Households in Westford	Less than 20%		20%-29%		30% or more	
		Number	Percent	Number	Percent	Number	Percent
Households with a mortgage	5,265	2,222	42.2%	1,596	30.3%	1,447	27.5%
Households without a mortgage	2,104	1,452	69.0%	233	11.1%	419	19.9%

Source: U.S. Census Bureau, 2010-2014 and 2015-2019 American Community Survey.

Historically, the housing burden has affected renters more than homeowners. Table 25 summarizes the estimated number of rental households that pay below \$1,000, \$1,000 to \$1,999, and more than \$2,000 monthly in gross rent. Table 26 describes the estimated number of rental households in categories based on rent as a percent of their income. Note that the total number of rental households don't match perfectly because of different ACS estimation methodologies.

As shown in Table 26, 37.5% of rental households (412 households) paid 30% or more of their annual incomes on rent as reported in the 2015-19 American Community Survey. This is a smaller number in absolute terms than the number of homeowners that pay more than 30% on monthly housing costs as reported in the previous section, but a larger number as a proportion of renters. This may also be an underestimate, because the U.S. Census does not include the cost of basic housing-related expenses,

such as utilities or fuel, unlike the ownership housing burdens.¹³

Notably, the ACS estimated the number of rental units increased by 72.6% between 2010-14 and 2015-19 from 636 to 1,098. The proportion of renters paying more than 30% of their income on rent declined by roughly ten percentage points during this time (48.1% in 2010-14 and 37.5% in 2015-19).

Table 25: Gross Rent (2015-19)

Rent	Number of Rental Households	Percent of Rental Households
Below \$1,000	198	16.7%
\$1,000 to \$1,999	365	30.7%
\$2,000 or more	542	45.7%
No cash rent	82	6.9%
Total	1,187	100.0%

Source: U.S. Census Bureau, 2015-2019 American Community Survey.

Table 26: Gross Rent as a Percentage of Household Income (2015-19)

Rent as a Percent of Income	Number of Rental Households	Percent of Rental Households
Less than 15.0 percent	99	9.0%
15.0 to 19.9 percent	320	29.1%
20.0 to 24.9 percent	147	13.4%
25.0 to 29.9 percent	120	10.9%
30.0 to 34.9 percent	120	10.9%
35.0 percent or more	292	26.6%
Not computed	89	8.1%
Total	1,098	100.0%

Source: U.S. Census Bureau, 2015-2019 American Community Survey.

In summary, Westford residents experience a range of housing burdens, with approximately 25.3% of homeowners and 37.5% of renters paying more than 30% of their annual incomes on housing related costs in 2015-19.

b. Fair Market Rent

As shown in Table 27, the Fair Market Rent (FMR) for a 1-bedroom apartment in the Lowell, MA HUD Metro FMR Area in FY 2021 was \$1,193 per month, and all Fair Market Rents were roughly between \$1,000 and \$2,000. Although the way the ACS reports data makes it difficult to make a direct comparison, in 2015-19, it was estimated that 45.7% of rental households paid more than \$2,000 monthly in rent, which is more than the 3-bedroom FMR. Given that most units in Westford are 1- or 2-

¹³ Selected monthly owner costs is the sum of payments for mortgages, deeds of trust, contracts to purchase, or similar debts on the property (including payments for the first mortgage, second or junior mortgages, and home equity loans); real estate taxes; fire, hazard, and flood insurance on the property; utilities (electricity, gas, and water); and fuels (oil, coal, kerosene, wood, etc.). It also includes, where appropriate, the monthly condominium fee for condominiums and mobile home costs (personal property taxes, site rent, registration fees, and license fees) for mobile homes. Source: U.S. Census Bureau.

Bedroom units, and given the ACS data is from a period prior to 2021 and rents have most likely increased, the proportion of rental households that pay more than FMR is likely greater.

Table 27: Fair Market Rent for Lowell, MA HUD Metro FMR Area (FY 2021)

	Efficiency	1-Bedroom	2-Bedroom	3-Bedroom	4-Bedroom
FY 2021 FMR	\$1,067	\$1,193	\$1,547	\$1,924	\$2,098

Source: FY 2021 Lowell, MA Metro FMR Area, HUD Fair Market Rent Documentation System, 2021.

Table 28 takes a closer look at the median rent for Westford residents in comparison to the rest of the NMCOG region. According to the 2010-2014 American Community Survey, the median gross rent for Westford was \$1,413 in 2010-2014. It grew to \$1,974 in 2015-19, an increase of 39.7%. Although this median rent includes apartments of all sizes (i.e., efficiency, 1-bedroom, 2-bedroom, etc.), it does indicate that the median rent in Westford is higher than the FMR for most apartments except 4-bedroom units. In addition, Westford’s median gross rent is the highest in the region, surpassing Tewksbury in the years between 2010-14 and 2015-19. The median gross rent of every community in the Greater Lowell region was below the FMR for 2-bedroom units except for Dunstable, Tewksbury, and Westford.

Table 28: Median Gross Rent in the Greater Lowell region (2010-2014 and 2015-2019)

Community	Median Gross Rent 2010-14	Median Gross Rent 2015-19	Change	% Change
Billerica	\$1,306	\$1,528	\$222	17.0%
Chelmsford	\$1,113	\$1,512	\$399	35.8%
Dracut	\$1,181	\$1,340	\$159	13.5%
Dunstable	\$1,250	\$1,750	\$500	40.0%
Lowell	\$1,005	\$1,158	\$153	15.2%
Pepperell	\$1,153	\$1,113	(\$40)	-3.5%
Tewksbury	\$1,498	\$1,925	\$427	28.5%
Tyngsborough	\$1,048	\$1,254	\$206	19.7%
Westford	\$1,413	\$1,974	\$561	39.7%

Source: U.S. Census Bureau, 2010-2014 and 2015-2019 American Community Survey.

c. Affordability Gap

In 2015-19, the median rental unit in Westford would have been considered “affordable” to households making at least \$78,960 per year. While this income level is lower than Westford’s overall median income in 2015-19 (\$144,917), an estimated 56.4% of all renter households (670 households), made less than \$75,000 per year. In other words, the current median gross rent in Westford is unaffordable for at least 56.4% of the rental households living in Town. Although these affordability thresholds are low, it’s important to remember they do not incorporate the cost of housing-related expenses, such as heat and utilities, into total housing costs.

The Warren Group reported that the 2020 median selling price for single-family homes in Westford was \$646,000. Assuming a 30-year fixed mortgage at a conservative 3% interest rate, 10% down, 1.2%

property tax, and \$800/year home insurance, a household would need to earn approximately \$153,000 per year for a single-family mortgage to be affordable.¹⁴ As of 2015-2019, an estimated 47.6% of total owner households (3,512 households), made less than \$150,000 per year. In other words, the median single-family home is unaffordable for at least 47.6% of the owner households living in town. This number is also likely higher in reality, as it does not include utilities or costs besides mortgage, taxes, and insurance.

d. Subsidized Housing Inventory Changes – Westford and Greater Lowell region

Table 29 summarizes the changes in Westford’s subsidized housing inventory (SHI) from 2010 to 2021. Several of the projects identified as “pipeline” projects in the *Westford Housing Production Plan for 2017-2021* were added to the SHI Inventory in subsequent years. This included Juniper Hill (2 units), Residences at Westford West (240 units), Sugar Maple Lane (7 units), Alder Point (2 units), and Two Robbins Road (180 units). The large majority of these were added to the SHI in 2017-18, at which time Westford surpassed its 10% goal. Notably, during the drafting of the HPP in late 2021, Roberta McGuire Senior Residences (7 units) and 3 new units in the DDS Group Homes were added to the inventory.

Overall, 441 affordable housing units have been added since the *Westford Housing Production Plan for 2017-2021* was approved by DHCD. However, 7 units were removed from the list during this time, resulting in a net increase of 434.

Table 29: Changes in Westford’s Subsidized Housing Inventory (2010-2021)

Time Period	Total SHI Units	Difference in Units from Previous Period	Percent Affordable
December 2010	347	+36	5.0%
August 2011	337	-10	4.4*%
October 2012	553	+216	7.2%
October 2013	553	0	7.2%
August 2014	575	+22	7.5%
May 2015	585	+10	7.6%
September 2016	635	+50	8.3%
March 2017	635	0	8.3%
September 2018	1,055	+420	13.8%
August 2019	1,057	+2	13.8%
July 2020	1,061	+4	13.8%
June 2021	1,059	-2	13.8%
December 2021	1,069	+10	13.9%

Source: Massachusetts Department of Housing and Community Development. *Note: The 2010 U.S. Census increased the number of year-round housing units to 7,671 units, thus increasing the 10% affordable housing target figure to 767 units.

Table 30 compares Westford to the rest of the region. In January 2014, Westford had 351 units representing 4.6% of the 2010 year-round housing inventory in town. Compared to the region, Westford had the third-lowest percentage of affordable units. At that time, only one of the communities in the region had a subsidized housing inventory that exceeded 10%: Lowell (12.6%). The remaining communities had SHI rates ranging between 3% (Pepperell) and 9.5% (Tewksbury).

¹⁴ Source: Zillow Affordability Calculator, <https://www.zillow.com/mortgage-calculator/house-affordability/>

As of June 2021, the region showed significant growth in its percentage of affordable housing, with the region as a whole surpassing 10.6% SHI rate. Billerica, Chelmsford, Lowell, Tewksbury, and Tyngsborough, in addition to Westford, exceeded the 10% target. Westford's SHI growth was by far the most dramatic of the communities (329.9%), the result of several comprehensive permit projects and the work of implementing previous Housing Production Plans. The only communities to lose affordable housing as a proportion of their 2010 housing inventory were Lowell (-1.8%) and Dracut (-17.9%).

Table 30: Subsidized Housing Inventories in the Greater Lowell region (January 2014-June 2021)

Community	Year- Round Housing Units 2010	Total Subsidized Housing Inventory (SHI) Units			Percent SHI Units	
		January 2014	June 2021	Percent Change	January 2014	June 2021
Billerica	14,442	857	1,664	94.2%	5.9%	11.5%
Chelmsford	13,741	1,064	1,433	34.7%	7.7%	10.4%
Dracut	11,318	719	590	-17.9%	6.4%	5.2%
Dunstable	1,085	0	0	NA	0%	0%
Lowell	41,308	5,215	5,119	-1.8%	12.6%	12.4%
Pepperell	4,335	129	130	0.8%	3.0%	3.0%
Tewksbury	10,803	1,030	1,096	6.4%	9.5%	10.2%
Tyngsborough	4,166	340	465	37.9%	8.2%	11.2%
Westford	7,671	351	1,059	329.9%	4.6%	13.8%
Greater Lowell region	108,869	9,705	11,556	19.1%	8.9%	10.6%

Source: Massachusetts Department of Housing and Community Development, June 2011 and Amendments

e. Existing Subsidized Housing Inventory

The Department of Housing and Community Development (DHCD) regularly reports the housing developments in a community that count toward its 10% affordability goal. This information summarizes individual projects and includes project names, housing type (rental versus homeownership), total SHI units, affordability expiration, subsidizing agency, and whether or not the development was built using a Comprehensive (40B) Permit. Table 31 summarizes the affordable housing within Westford's 40B SHI Report as of December 9, 2021.

Table 31: Westford Subsidized Housing Inventory (SHI) (December 9, 2021)

Project Name	Address	Type	Total SHI Units	Affordability Expires	Built with a Comp Permit?	Subsidizing Agency
Line Road	Line Road	Rental	8	Perpetuity	No	DHCD
65 Tadmuck Rd.	65 Tadmuck Rd.	Rental	48	Perpetuity	No	DHCD
7 Cross & Church Sts.	7 Cross & Church Sts.	Rental	25	Perpetuity	No	DHCD
School Lane	School Lane	Rental	6	Perpetuity	No	DHCD
Haystack Estates	Groton Road	Ownership	32	Perpetuity	No	DHCD
Stoneview Village	Stoneview Drive	Ownership	10	Perpetuity	No	DHCD

Table 31: Westford Subsidized Housing Inventory (SHI) (December 9, 2021)

Project Name	Address	Type	Total SHI Units	Affordability Expires	Built with a Comp Permit?	Subsidizing Agency
Rosegate at Westford	99 Main Street	Ownership	3	Perpetuity	Yes	FHLBB / MassHousing
Brookside Mill	Brookside Road	Rental	5	2054	No	DHCD / DHCD
DDS Group Homes	Confidential	Rental	8	N/A	No	DDS
Keyes Corner	211 Groton Road	Ownership	9	Perpetuity	Yes	DHCD
DMH Group Homes	Confidential	Rental	4	N/A	No	DMH
Concord Place	135 - 137 Concord Rd	Ownership	4	Perpetuity	Yes	MassHousing
Woodlands at Laurel Hills	5, 12, 18, 24 Durkee Lane	Rental	84	Perpetuity	Yes	MassDevelopment
Orion Way	Orion Way	Ownership	1	Perpetuity	No	DHCD
Southgate	50 Chelmsford Rd	Ownership	11	Perpetuity	Yes	MassHousing
Tadmuck Meadows	Tadmuck/Littleton Rd	Ownership	10	Perpetuity	Yes	MassHousing
Elderberry Estates	Silo Path	Ownership	2	Perpetuity	No	DHCD
Tadmuck Housing	65 Tadmuck Rd	Rental	37	2047	No	HUD
Graniteville Woods	West St	Ownership	41	Perpetuity	Yes	MassHousing
Residences at Stony Brook	Farmer's Way	Rental	15	2035	No	DHCD / MHP
Hawk Ridge	Makepeace Road	Ownership	4	Perpetuity	No	DHCD
Cottage in the Woods	Boston and Blake's Hill Roads	Ownership	20	Perpetuity	Yes	MassHousing
Stone Ridge	Stone Ridge Street	Ownership	2	Perpetuity	No	DHCD
Princeton Westford Apartment Homes	16 Littleton Drive	Rental	200	Perpetuity	Yes	MHP
CHOICE Housing	173 Carlisle Road	Ownership	5	2043	No	DHCD / MassHousing
Residences at Stony Brook II	Off Farmer Way/1-9 Coakley Circle	Rental	36	2046	No	DHCD / MassHousing
Beaver Brook Village	Conservation Lane	Ownership	1	Perpetuity	No	DHCD
Residences at Westford West	Concord Road	Rental	240	Perpetuity	Yes	MHP
Two Robbins Road	2 Robbins Rd	Rental	180	Perpetuity	Yes	MassHousing
Juniper Hill Road	Juniper Hill Rd	Ownership	2	Perpetuity	No	DHCD
Sugar Maple Lane	Powers Road	Ownership	7	Perpetuity	Yes	Mass Housing Finance Agency

Table 31: Westford Subsidized Housing Inventory (SHI) (December 9, 2021)

Project Name	Address	Type	Total SHI Units	Affordability Expires	Built with a Comp Permit?	Subsidizing Agency
Alder Point	Alder Point Rd	Ownership	2	Perpetuity	Yes	MassHousing
Roberta McGuire Senior Residences	2 Balsam Circle	Rental	7	Perpetuity	No	DHCD, MassHousing
Total			1,069			

Source: Massachusetts Department of Housing and Community Development 40B Chapter 40B Subsidized Housing Inventory, December 9, 2021

The new additions to the SHI include the following developments:

- **Juniper Hill Road:** This subdivision included 2 affordable/subsidized units by Habitat for Humanity in its 18 new one-unit detached homes.
- **Sugar Maple Lane:** This development included 21 market-rate one-unit attached homes and 7 subsidized/affordable one-unit attached homes.
- **Residences at Westford West:** This development included 240 subsidized/affordable homes in three 80-unit buildings.
- **Two Robbins Road:** This development included 168 homes in two 84-unit buildings and 12 one-unit attached homes. 36 of the units are affordable at 50% AMI, qualifying the entire rental development for the SHI.
- **Alder Point:** This development included 6 market-rate units and 2 subsidized/affordable units.
- **Roberta McGuire Senior Residences:** This development included 7 subsidized/affordable, age-restricted (62 and older), one-unit attached supportive housing units.

As of October 2021, there are two developments representing 48 units in Westford in the “pipeline” pending local approvals. These are summarized in Table 32.

One of the pipeline developments is 35 Town Farm Road, a development of a Town-owned parcel led by a “Town Farm Task Force”. The Task Force recommended the historic buildings on the parcel be adaptively reused as senior housing and the Westford Food Pantry. The Task Force assisted with a Request for Proposals (RFP) that resulted in the selection of Choice as developer. The development is anticipated to create 35 units, with 21 units to be restricted to tenants making 60% or less of the area median income (“AMI”); and 9 to be restricted to tenants making 30% or less of AMI. The remaining 5 apartment units will be market-rate. The Town is expecting to allocate \$2 million in Community Preservation Act funds which will be added to nine additional funding sources for this development.

This other is Helena Crocker Residences, which was listed in the *Westford Housing Production Plan for 2017-2021* as “Littleton Landing.” It is a planned community at 60 Littleton Road being developed by Choice. It is planned to include a mix of 18 studio and one-bedroom apartment units. All of the units will be affordable and made available to seniors age 62 and older.

Table 32: Pipeline of Subsidized Housing Inventory Projects as of October 2021

Project Name	Address	Type	Affordability Expires	Built with a Comprehensive Permit?	Total SHI Units
35 Town Farm Road	35 Town Farm Road	Rental	Perpetuity	No, likely LAU/ LIP	30
Helena Crocker Residences	60 Littleton Road	Rental units available to seniors age 62 and older	Perpetuity	No, Use Variance and LAU/LIP	18
Total					48

Source: Town of Westford, October 2021.

6. Affordable Housing Development

a. Previous Projected and Actual Affordable Housing

The *Westford Housing Production Plan for 2017-2021* was submitted to DHCD and approved effective on December 22, 2016. At that time, Westford had 635 units in the SHI¹⁵. The Town needed 132 additional subsidized units to meet its 10% goal of 767. The *Westford Housing Production Plan for 2017-2021* identified ten projects that were in the permitting approval process, or “pipeline”, for a total of 510 units.

The *Westford Housing Production Plan for 2017-2021* outlined several housing development schedules in order to reach its 10% goal. Each assumed the average growth rate of total households from 2000-2015, 1.58% annually, would continue, adding an average of 136 units of total housing per year. Each further assumed that the pipeline projects nearest completion (totaling 496 affordable units) would be completed in 2017 and all projects would be completed by 2020.

1. Assuming that 20% of all new units constructed were subsidized in addition to pipeline units, Westford would reach its goal in 2017 (1,131 affordable units out of 9,221 total units) and reach 16.7% subsidized in 2021.
2. Assuming a 0.5% production of subsidized units per year in addition to pipeline units, Westford would reach its goal in 2017 (1,140 affordable units out of 9,221 total units) and reach 17.4% subsidized in 2021.
3. Assuming a 1.0% production of subsidized units per year in addition to pipeline units, Westford would reach its goal in 2017 (1,181 affordable units out of 9,221 total units) and reach 19.9% subsidized in 2021.

However, as of December 9, 2021, Westford did not implement all 510 pipeline units, and 7 units’ affordability expired or were otherwise taken out of the SHI.¹⁶ In actuality, Westford added a net 434 units for a total of 1,069 subsidized units out of 7,671 total units (*2010 Decennial Census*), resulting in

¹⁵ DHCD, SHI report dated September 2016

¹⁶ Westford Community Residence and two DDS Group Homes units were taken off the SHI

13.9% of Westford's total units being listed on the SHI. The 2020 U.S. Decennial Census reported 9,237 total units, but an unknown number of these are vacant seasonal and will not count as year-round units for the purposes of computing a SHI goal.¹⁷ Therefore, depending on the number of seasonal vacant units, Westford's SHI units would represent between 11.6% and 12.5% of 2020 year-round units.

It should be noted that the 23 affordable units as part of Abbot Mill phases 1 and 2 that were identified as "pipeline" units in the *Westford Housing Production Plan for 2017-2021* were added to Westford's housing inventory. However, due to the inability for the developer and the Department of Housing and Community Development to come to an agreement on specific restriction language, these units were not eligible to be added to Westford's SHI.

b. Current Projected Affordable Housing

A community will be certified to be in compliance with an approved HPP if, during a single calendar year, it has increased its 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%.

Under M.G.L. Chapter 40B, once a plan has been certified, the Zoning Board of Appeals (ZBA) may deny a Comprehensive Permit application and, if appealed, the Housing Appeals Committee will uphold the decision based on a local development being "consistent with local need".. Based on anticipated 2020 Census results, Westford will need to produce 46 affordable units annually to achieve 0.5% development certification and 92 units per year to achieve 1.0% development certification.

Based upon the information provided previously, Westford currently has two developments – 35 Town Farm Road and 60 Littleton Road – in the permitting approval process, or "pipeline", for a total of 48 subsidized units. The addition of these affordable housing units should also be considered in the different scenarios.

The average growth rate of total housing units between the 2010 and 2020 Decennial Census was 1.6% additional units per year. The analysis in Table 33 assumes this amount of growth will be maintained between 2022 and 2026, as MassDOT updated projections were not available at the time of this HPP's publication. This would result in an additional 779 units added to the Town's housing inventory between 2021 and 2026.

Table 33 describes two timeline scenarios: one with growth in subsidized housing units at 0.5% per year, and one with growth at 1.0% per year. The timeline also assumes that the 48 units in the pipeline will be added to the SHI in 2022, resulting in 2 extra units in 2022 in the 0.5% scenario. DHCD has not yet issued a new year-round subsidized housing unit goal based upon 2020 U.S. Census figures, but an update is anticipated in 2022.

¹⁷ The 2020 U.S. Decennial Census counted 8,565 occupied housing units and 672 vacant housing units, but this includes vacant seasonal/occasional units, which will not be included in DHCD's calculations. The number of vacant year-round units will be released in the Demographic Profile tentatively in 2022, which is expected to be slightly smaller than the total housing units. DHCD will release a new 10% goal after this data is released.

Table 33: Affordable Housing Production Timeline for Westford – 0.5% or 1% Annually

Year	Total Units	0.5% Increase				1.0% Increase			
		Additional Affordable Units	Total Number of Affordable Units	Market Rate Units	Percent Affordable	Additional Affordable Units	Total Number of Affordable Units	Market Rate Units	Percent Affordable
2022	9,536	48	1,107	8,429	11.6%	92	1,151	8,385	12.1%
2023	9,689	46	1,153	8,537	11.9%	92	1,244	8,446	12.8%
2024	9,845	46	1,198	8,647	12.2%	92	1,336	8,509	13.6%
2025	10,003	46	1,244	8,759	12.4%	92	1,428	8,575	14.3%
2026	10,164	46	1,290	8,874	12.7%	92	1,521	8,643	15.0%

Source: U.S. Census, 2020 U.S. Decennial Census and NMCOC projections based on 2010-2020 total unit growth and .5% and 1% affordable growth

If Westford 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 the Department, 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 have been met, and the factual basis for that position, including any necessary supportive documentation. If the Applicant wishes to challenge the Board’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 Board’s notice, including any documentation to support its position. The Department shall thereupon review the materials provided by both parties and issue a decision within 30 days of its receipt of all materials. The Board 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 Department 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. (760 CMR 50.03 (8)(a))

In addition, if either the ZBA

...or the Applicant wishes to appeal a decision issued by the Department pursuant to 760 CMR 56.03(8)(a), including one resulting from the failure of the Department to issue a timely decision, that party shall file an interlocutory appeal with the Committee on an expedited basis, pursuant to 760 CMR 56.05(9)(c) and 56.06(7)(e)(11), within 20 days of its receipt of the decision with a copy to the other party and to the Department. The Board’s hearing of the project shall proceed in accordance with 760 CMR 56.05. Any appeals to the courts of the Commonwealth shall not be taken until after the Board has completed its hearing and the Committee has rendered a decision on any subsequent appeal. (760 CMR 50.05 (8)(c))

7. Gaps between Existing Housing Needs and Current Supply

As the Comprehensive Needs Analysis illustrates, there are some inconsistencies between the current and anticipated housing needs of the local population and the existing housing inventory. This section summarizes these gaps to provide a framework for articulating a new set of housing development strategies and goals for Westford.

a. Household Incomes and Poverty

Notwithstanding the fact that Westford is viewed as an affluent community, there are specific populations that have not shared in the wealth and are in need of assistance. While the numbers of households making less than \$15,000 has continued to decrease between 2010-14 and 2015-19, the need for targeted assistance still remains. The number of households making below the area median household income for the Greater Lowell region, \$112,900, has increased to 2,836, or more than a third of Westford's households in 2015-19 (see Table 14 and Figure 8), while 1,285 households earn less than \$50,000 in annual income. Overall costs have increased for these low- and moderate-income households. However, the resources available for these households have been reduced at the federal level and are generally targeted to lower-income communities.

Based upon the 2015-2019 American Community Survey, 500 Westford residents (approximately 2.1% of total population) were classified as living in poverty. In terms of age breakdown, residents under age 18 represented roughly 19% of the population living under poverty in Westford. Individuals aged 65 and older represented 27.4% of those living under poverty. The largest groups were those aged 45 to 54 years (24.6%) and those over 75 years (21.8%). Given the limited resources available to the elderly and the projected growth for this age cohort, the Town will need to keep in mind their special circumstances and work with the Westford Housing Authority to address those needs.

b. Households with Housing Costs that Exceed Affordability Thresholds

Based upon the Housing Affordability Analysis, approximately 25.3% of the total owner-occupied households, or 1,866 households, were considered at least moderately burdened (paying 30% or more of their income for housing costs) in 2015-19. This included 27.5% of Westford homeowners with a mortgage (1,447) and, 19.9% of homeowners without a mortgage (419). With a median single-family sales price of \$646,000 in Westford in 2020, a household would need to earn at least \$153,000 per year for a single-family house to be affordable. Many households looking to establish themselves in Westford find the cost of market-rate housing prohibitive. Affordability issues aren't limited to just owner-occupied units. The median apartment in Westford would be "affordable" to households making at least \$78,960 per year. Therefore, the current median gross rent in Westford is unaffordable for at least 56.4% of the rental households living in town.

c. Aging and Special Needs Populations

As the demographic analysis section of this plan illustrates, the Town has experienced population growth among its aging and special needs populations. Between 2010 and 2015-19, the number of residents between 60 and 74 years of age increased by 24.1% and the population of residents 75 and older increased by 68.8%. This age group is projected to further increase by 116.5% between 2020 and

2040. In addition, the residents aged 60-74 will increase by 26.9% from 2020 to 2040. These combined age groups are anticipated to comprise 23.4% of the total Westford population in 2040. This population will require special resources and housing from the community.

Residents with disabilities are another group that will require special attention related to their housing needs. Approximately 7.5% of Westford's population (1,817) was reported to have a disability in 2015-19, which is an increase from 2010-14. Residents with disabilities often have unique housing needs in terms of the physical design and/or accessibility of their homes, access to services, and the cost relative to a fixed or limited income. This Housing Production Plan needs to be sensitive to the needs of the elderly and those with disabilities in considering future affordable housing developments.

d. Small Households and Families

The average household size in Westford decreased from 3.03 persons in 2000 to 2.84 persons in 2015-19. The 2010-14 and 2015-19 ACS data indicates that, at least between those two time periods, shrinking households were driven by a large increase in 1-person households, from 12.8% to 16.7% of all households. Large, 5-person family households experienced the largest drop in percentage, from 7.9% to 5.2% of all households. When the family and nonfamily households are combined, the 2-person household maintained its predominance, shrinking only a small amount from 32.8% to 30.1%. Four-person households saw the second-largest decrease, shrinking from 25.6% to 25.2%. Three-person households grew from 18.3% to 20.5% of all households. It should be noted that almost all households above 2 people are family households. During the period from 2000 to 2020, Westford has diversified the types of housing units that are available. There should be a continued emphasis on housing for single people living alone and small and midsize families (3- and 4-bedroom units) to address the needs of these families and to ensure that everyone who wants to live in Westford can find housing that meets their specific needs in terms of unit size and price.

8. Affordable Housing Efforts in Westford

a. Actions since the *Westford Housing Production Plan for 2017-2021*

The Town of Westford has been very proactive in its implementation of the affordable housing strategy outlined in the *2011-2015 Affordable Housing Production Plan*. Through the combined work of the Affordable Housing Committee, the Affordable Housing Trust, the Westford Housing Authority, and the Town of Westford, several of the "pipeline" projects identified in the *Westford Housing Production Plan for 2017-2021* were implemented.

These projects included Residences at Westford West, Two Robbins Road, Juniper Hill Road, Sugar Maple Lane, and Alder Point, which accounted for 431 SHI units. The approval and development of these affordable housing units reflected the commitment on the part of the Town and its housing partners to provide greater choices and housing options for low- and moderate-income families. With the units represented by these developments, Westford surpassed its 10% SHI goal.

It should be noted that the 23 affordable units as part of Abbot Mill phases 1 and 2 that were identified as "pipeline" units in the *Westford Housing Production Plan for 2017-2021* were added to Westford's

housing inventory. However, due to the inability for the developer and the Department of Housing and Community Development to come to an agreement on specific restriction language, these units were not eligible to be added to Westford's SHI.

The Affordable Housing Committee and Affordable Housing Trust (separately and as the merged Affordable Housing Trust Committee as of 2021), with the assistance of the Community Preservation Committee, have played active roles in providing essential funding for affordable housing projects and in working with developers to ensure that the Town's housing requirements are fully addressed. From FY 2016 to FY 2021 inclusive, the Community Preservation Committee, with the support of Town Meeting, provided \$4,353,025 in affordable housing funds, some of which were allocated to support the Affordable Housing Trust and others directly to specific developments such as the Helena Crocker Residences and the Town Farm project now in the pipeline. These projects would not have moved forward without the support of the Community Preservation Committee.

Additionally, the Affordable Housing Trust, utilizing its annual allocations from the Community Preservation Committee, provided \$345,547 from FY 2016 to November 2021 for three specific housing projects or programs: Sargent School Renovation, Carlisle Road Senior Housing, and Westford Rental Assistance Program (WRAP, see Westford Housing Authority section below). The Town of Westford, through the Community Preservation Committee and the Affordable Housing Trust Committee, will continue to invest in its affordable housing inventory so that every resident has an opportunity for safe, secure, and affordable housing.

In addition to the above, the following strategies that were listed in the Affordable Housing Goals and Strategies section of the *Westford Housing Production Plan for 2017-2021* were implemented or advanced (note the strategy from 2017-2021 is referenced for each action):

- Town staff began working with the Town Counsel and Planning Board to address known contradictions or inconsistencies in the OSRD Bylaw (this effort continues into the *Westford Housing Production Plan for 2022-2026*) **(Strategy 1.a)**.
- The Affordable Housing Trust Committee designated representatives to monitor several other boards and committees to coordinate efforts for affordable housing, open space, and economic development initiatives **(1.d)**.
- Landowners participated in conservation activities through OSRDs such as Juniper Hill, Spalding Hill Estates, Wendell Place, Colonel Rolls, and Diane Lane **(2.b)**.
- The Affordable Housing Trust Committee designated a member to develop an affordable housing training plan **(2.c)**.
- The Town supported the development of rental properties including Residences at Westford West, Two Robbins Apartment Homes, Helena Crocker Residences, and Roberta McGuire Senior Residences **(3.a)**.

- The Town supported the development of housing for seniors including developments at Town Farm Road, Balsam Circle, and Helena Crocker Residences **(3.b)**.
- The Town supported the development of affordable family housing, including housing at Juniper Hill, Residences at Westford West, Two Robbins, Sugar Maple Lane, and Abbot Mill II **(3.c)**.
- The Affordable Housing Trust Committee designated a member to participate in the MetroWest Partnership **(4.c)**.

b. Affordable Housing Entities

This section summarizes the efforts of various organizations working to advance affordable housing opportunities in Westford.

i. Affordable Housing Trust and Affordable Housing Committee

The Affordable Housing Committee was established in 1987. Its role was to “advocate for the preservation and development of diversified housing opportunities for families and individuals whose income is less than the median income for the Greater Lowell area”. More specifically, its goal was “to keep this housing within community standards and dispersed throughout the Town”. In addressing the State’s mandate that 10% of each community’s housing inventory be permanently affordable to residents earning 80% or less of the area median income, the Affordable Housing Committee oversaw the development of the *2011-2015 Westford Affordable Housing Production Plan* and the *Westford Housing Production Plan for 2017-2021*.

The Affordable Housing Trust Fund (AHTF) was established by vote of the 2005 Annual Town Meeting. It is the funding source for the creation and preservation of affordable housing in Westford and is comprised principally of funds allocated by the Community Preservation Committee. Under the Community Preservation Act (CPA), 10% is set aside for affordable housing initiatives within the community. The Affordable Housing Trust worked closely with the Affordable Housing Committee and managed the AHTF. The Affordable Housing Trust actively developed, acquired, renovated, and resold houses and properties to move the Town closer to its 10% affordable housing goal.

The most distinct difference between the two committees was that the Affordable Housing Committee focused primarily on policy, while the Affordable Housing Trust was a fiduciary committee managing the AHTF. In 2019, recognizing the overlap in goals and work, the committees began joint meetings and began investigating the feasibility of forming a new, merged committee. The intent was to make both committees’ decision-making and work more efficient. This merger was completed in 2021.

The newly-merged Affordable Housing Trust Committee is currently overseeing the *Westford Housing Production Plan for 2022-2026* through its HPP Subcommittee. It works closely with the Community Preservation Committee, the Westford Housing Authority, and the Town to ensure that additional housing options are made available to low- and moderate-income residents. The

Executive Director of the Westford Housing Authority and the Town’s Director of Land Use Management provide ongoing staff support to the Affordable Housing Trust Committee.

Table 34 is a summary of Affordable Housing Trust Fund expenditures approved by the Affordable Housing Trust or the Affordable Housing Trust Committee from 2016 through November 2021.

Table 34: Affordable Housing Trust Fund Allocations & Expenditures (2016 - November 2021)

Date	Amount (\$)	Purpose
12/05/2018	\$75,547	Conditional Funding Reservation for not more than \$75,547 of Trust Funds for completion of the Sargent School Renovation/Preservation Project
07/31/2020 *	\$210,000*	Conditional Funding Reservation for not more than \$210,000 of Trust Funds for the Roberta McGuire Residences (Carlisle Road Senior Housing Project - 21 & 23 Carlisle Road, Scott Clark, Clark Property Development, Inc.)
07/31/2020	\$95,000	Conditional Funding Reservation for not more than \$95,000 of Trust Funds for completion of Westford Rental Assistance Program (WRAP), Jennifer Claro, Director of Council on Aging
TOTAL	\$380,547	

Source: Town of Westford, November 15, 2021

*Conditional Funding Reservation for not more than \$175,000 for Roberta McGuire Residences was allocated on June 17, 2019, and on July 31, 2020, this total was increased to \$210,000 to account for modifications and COVID-related increased costs

ii. Community Preservation Committee

In 2001, Westford became the 17th community in Massachusetts to adopt the Community Preservation Act (CPA). This legislation allows communities to impose a surcharge on annual property tax bills and use the funds to preserve open space and historic resources, address recreation needs, and create affordable housing. Like all communities that have adopted the CPA, Westford’s Community Preservation Committee (CPC) allocates a minimum of 10% of the estimated revenue each year towards affordable housing initiatives. Westford residents pay a 3% property tax surcharge to finance these community preservation projects.

In FY 2021, Westford raised \$2,692,733 in local Community Preservation funds through its 3% surcharge, investment income, and interest on late tax payments, which was matched by state funds totaling \$636,005, for a total FY 2021 CPA fund of \$3,328,738. From FY 2017 to FY 2021, the Community Preservation Committee was able to appropriate \$4,353,025.00 to affordable housing projects as outlined in Table 35.

Table 35: Community Preservation Committee Affordable Housing Appropriations (FY 2017-2021)

Project	Motion	Date	Appropriation
Community Housing Reserve	From the Undesignated Fund Balance to the Community Housing Reserve. This allocation more than covers the required 10% for Community Housing	3/25/2017	\$225,876.00
Sargent School Windows Preservation/ADA Ramp	For the Sargent School Windows Preservation and ADA Ramp Access Project and any other related costs	3/24/2018	\$147,141.00
Community Housing Reserve	From the Undesignated Fund Balance to the Community Housing Reserve. This allocation more than covers the required 10% for Community Housing	3/24/2018	\$218,679.00
Community Housing Reserve	From the Undesignated Fund Balance to the Community Housing Reserve. This allocation more than covers the required 10% for Community Housing	3/23/2019	\$223,067.00
Helena Crocker Affordable Senior Residence	From the Community Housing Reserve for the Helena Crocker Affordable Housing Residences and any other related costs	10/28/2019	\$1,035,000.00
Community Housing Reserve	From the Undesignated Fund Balance to the Community Housing Reserve. This allocation more than covers the required 10% for Community Housing	6/20/2020	\$237,052.00
Community Housing Reserve	From the Undesignated Fund Balance to the Community Housing Reserve. This allocation more than covers the required 10% for Community Housing	6/12/2021	\$266,210.00
Town Farm Residences	For the planning, design, development, and construction of a 35-unit mixed income senior residential affordable housing project at 35 Town Farm Road, including any costs incidental and related thereto in order to meet this appropriation	6/12/2021	\$2,000,000.00
Total			\$4,353,025.00

Source: Community Preservation Committee, November 9, 2021

iii. Westford Housing Authority

The Westford Housing Authority (WHA), established in 1971, is the local body responsible for the expenditure of State and Federal housing grants. A Board of Commissioners, four of whom are elected by the Town for five-year terms and one who is appointed by the Governor, set policy and oversee the WHA’s operations. The Executive Director and the WHA staff carry out the day-to-day activities. Board members meet on the second Thursday of each month at 6:00 pm, alternating locations between senior developments at 65 Tadmuck Road and 7 Cross Street.

The WHA owns and manages 73 units of senior housing, 9 units of family housing, and 8 units for people with disabilities. The WHA provides management and maintenance for these units. The WHA is currently overseeing several capital improvement projects including septic tank replacement at Tadmuck Road and infrastructure repairs at Sargent School Senior Housing,

replacing worn flooring in all common areas, solid surface and shower valve replacement, development-wide bath exhaust fan replacement, and tree trimming.

The WHA places a prominent role in educating the general public about affordable housing and provides staff support to the Affordable Housing Trust Committee. The WHA regularly updates the Town's Subsidized Housing Inventory (SHI) with the Massachusetts Department of Housing and Community Development (DHCD) and has actively participated in the development of the *2011-2015 Westford Affordable Housing Production Plan*, the *Westford Housing Production Plan for 2017-2021*, and the *Westford Housing Production Plan for 2022-2026*.

The WHA has also taken on the management of two newly-created rental assistance programs. The Westford Rental Assistance Program (WRAP) was created by the Council on Aging to provide rental assistance to those Westford Residents earning 30-50% AMI. The Westford Emergency Rental Assistance Program (WERAP) was created by the Affordable Housing Trust Fund to provide rental assistance to those Westford residents with incomes in the 80-100% AMI category.

The WHA has partnered with the Chelmsford Housing Authority (CHA) on all lotteries in Westford. The CHA serves as the Lottery Agent and the WHA serves as the Monitoring Agent. WHA will handle future sales and monitor the sales of the lottery units to affirm the work of the CHA. Moreover, the WHA and CHA have formed a partnership to address affordable housing issues on a regional scale, and the CHA provides technical assistance for the review of potential affordable housing developments in Westford.

C. Development Constraints and Limitations

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

1. Land Use Development Patterns and Potential

Table 36 shows the changes in land use in Westford between 1985 and 2016, the last year this data was available. Although the majority of acreage in town was undeveloped as of 2016, commercial, industrial, and residential uses increased significantly during this time period, growing by 81.7%, 72.9%, and 84.6%, respectively. The majority of developed land in 2016 was used for residential purposes, accounting for 33.5% of the Town’s total acreage and 81% of all developed land.

Table 36: Land Use Development Patterns in Westford (1985-2016)

Land Use	Acres				Percent Change	Percent of Town
	1985	1999	2007	2016	1985-2016	2016
Commercial	137.9	180.7	217.3	250.5	81.7%	1.2%
Industrial	572.8	996.5	992.0	990.1	72.9%	4.9%
Residential	3,642.9	6,215.5	6,562.7	6,724.4	84.6%	33.5%
Other	15,713.5	12,674.4	12,295.1	12,102.1	-23.0%	60.3%
Total	20,067.1	20,067.1	20,067.1	20,067.1	N/A	99.9%

Land Use	Acres				Percent Change	Percent of Town
	1985	1999	2007	2016	1985-2016	2016
Developed	4,353.7	7,455.4	8,114.3	8,301.5	90.7%	41.4%
Undeveloped	15,713.5	12,611.7	11,952.8	11,765.6	-25.1%	58.6%
Total	20,067.1	20,067.1	20,067.1	20,067.1	N/A	100.0%

Sources: For 1985 and 1999 data, UMass-Amherst, MacConnell Land Use Maps, MassGIS; for 2007 and 2016, Westford GIS, aerial photogrammetry analysis and shape files. Data supplied courtesy of NMCOG.

2. Zoning

NMCOG undertook an analysis of how zoning constrains or enables housing production in the Town of Westford. This is based on the zoning amendments passed through the June 12, 2021 Town Meeting. Although commercial uses have increased in Westford in recent years, especially along the Route 110/Littleton Road corridor, the community remains largely residential in nature. Nearly 90 percent of land in Westford is zoned exclusively for residential uses. Westford has consistently worked to preserve open spaces, while also providing realistic avenues for new affordable housing production.

a. Overview

The Town of Westford Zoning Bylaw has 10 zoning districts, of which all but one, Business Limited (BL), allow some types of housing as of right or by Special Permit from the Planning Board or the Zoning

Board of Appeals. Three districts, Commercial Highway (CH), Industrial Highway (IH), and Industrial D (ID), only allow assisted living facilities by Special Permit.

Four of these allow Single Family Dwellings as of right:

- Residence A (RA)
- Residence B (RB)
- Business (B)
- Industrial A (IA)

In addition, Industrial B (IB) and Industrial C (IC) allow Single Family Dwellings by Special Permit from the Zoning Board of Appeals (ZBA).

No other residential uses are allowed as of right in any district. However, the conversion of a dwelling that was in existence prior to the adoption of the Zoning Bylaw of up to 4 units is allowed by Special Permit from the ZBA in the RA, RB, B, IA IB and IC zoning districts. In addition, Open Space Residential Development (OSRD) and Flexible Development are allowed by Special Permit from the Planning Board in RA, RB, IA, and IC districts.

Finally, there are 8 overlay districts, of which 2 allow additional residential uses: the Senior Residential Multi-family District (SRMOD), which is designated by Town Meeting, allows senior-restricted multi-family development. The Mill Conversion Overlay District (MCOB), which covers certain parcels containing historic mills, allows conversion to multi-family by Special Permit from the Planning Board. Table 37 summarizes these uses.

Table 37: Housing Types by Zoning Districts

Housing Type	As of Right	Special Permit
Single Family Dwelling, Detached	RA, RB, B, IA	IB, IC
Conversion of a Dwelling		RA, RB, B, IA, IB, IC
Open space residential development		RA, RB, IA, IC
Flexible development		RA, RB, IA, IC
Assisted living facility		RA, RB, CH, IH, IA, IB, IC, ID
Senior Residential Multi-family Development	Within SRMOD as designated by Town Meeting	
Mill Conversion	Within MCOB by Special Permit	

Notably, other overlay districts such as the Water Resource Protection Overlay District limit the type and density of development in areas that would impact the quality and quantity of drinking water supply.

b. District Descriptions and Dimensional Requirements

Table 38 summarizes the allowed residential uses by zoning district, according to the current Westford Zoning Bylaw. However, the Town’s Zoning Bylaw allows for Use Variances, which have resulted in higher density projects.

Table 38: Allowed Residential Uses by Zoning District

Residential Use	Zoning District									
	RA	RB	B	BL	CH	IH	IA	IB	IC	ID
Single-Family Dwelling	Yes	Yes	Yes	No	No	No	Yes	SPA	SPA	No
Conversion of Dwelling	SPA	SPA	SPA	No	No	No	SPA	SPA	SPA	No
Open Space Residential Development	SPB	SPB	No	No	No	No	SPB	No	SPB	No
Flexible Development	SPB	SPB	No	No	No	No	SPB	No	SPB	No
Assisted Living Facility	SPB	SPB	No	No	SPB	SPB	SPB	SPB	SPB	SPB

Source: Town of Westford Zoning Bylaw, September 26, 2014

Table 39 summarizes the dimensional requirements for residential lots in the RA and RB districts. The Town’s Zoning Bylaw mandates that residential development in both residential and non-residential districts follow these requirements, unless a density bonus or other special allowance is awarded.

Table 39: Dimensional Requirements for the Residence A and B Districts

Dimension	Residence A	Residence B
Minimum Lot Size (square feet)	40,000	20,000
Minimum Lot Frontage (feet)	200	100
Minimum Front Yard (feet)	50	25
Minimum Side Yard (feet)	15	15
Minimum Rear Yard (feet)	30	30
Maximum Building Height (feet)	35	35
Maximum Building Area (stories)	2.5	2.5
Minimum Distance between Buildings on same lot (feet)	20	20

Source: Town of Westford Zoning Bylaw, September 26, 2014

Westford’s population has increased by more than 50% since 1990 and many prime residential parcels have been developed over that period. Among Westford’s two residential zoning districts, the Residence A District is much larger in area, encompassing more than 17,000 acres and 85.2% of Westford’s land area. The Residence A District requires a larger minimum lot size of 40,000 square feet and a minimum frontage of 200 feet. The Residence B District, which includes areas of historically denser development, requires a minimum lot size of 20,000 square feet and less frontage than development in the Residence A district. The Residence B district encompasses 936 acres or approximately 4.7% of Westford’s total land area (See Table 40).

Table 40: Land Area by Zoning District

Zoning District	Acreage	Percentage of land area
Business (B)	61.4	0.31
Business Limited (BL)	6.18	0.03
Commercial Highway (CH)	494.44	2.46
Industrial A (IA)	698.26	3.47
Industrial B (IB)	76.6	0.38
Industrial C (IC)	195.71	0.97
Industrial D (ID)	32.59	0.16
Industrial Highway (IH)	473.29	2.35
Residence A (RA)	17,142.26	85.21
Residence B (RB)	936.22	4.65
TOTAL	20,116.95	99.99

Source: NMCOG GIS

Based on a review of Westford’s Tax Assessor Records and categorization by NMCOG staff summarized in Table 41, Westford is approaching buildout in both its RA and RB districts. This should be understood as an estimate, not an exact count, as field verification would be necessary to confirm uses. That said, 374 parcels (6.2%), representing 2,084 acres (14.5%), are classified as “undeveloped” or “vacant” in the RA district, which requires a minimum lot size of 40,000 square feet and 200 feet of frontage. Ninety-six parcels (6.0%) representing 39.99 acres (5.0%) have that classification in the RB district, which requires a minimum lot size of 20,000 square feet. In other words, the RA district has about 14.5% of its undeveloped area remaining, while the RB district which allows smaller lots only has 5% of its land remaining. Those are probably overestimates of developable land, as many of the remaining parcels can be considered unbuildable due to lot size, wetlands, or other factors.

Table 41: Tax Assessor’s Records by Land Use, RA and RB zones, FY 2021

Land Use	Residence A				Residence B			
	Parcels		Area (Acres)		Parcels		Area (Acres)	
Agricultural	3	0%	65.97	0%	0	0%	0	0%
Agricultural Chapter 61A	12	0%	91.81	1%	0	0%	0	0%
Cemeteries	3	0%	13.48	0%	0	0%	0	0%
Chapter 61A Woodland	2	0%	41.01	0%	0	0%	0	0%
Commercial	14	0%	61.67	0%	5	0%	8.17	1%
Government	18	0%	428.11	3%	1	0%	0.21	0%
Industrial	21	0%	150.05	1%	0	0%	0	0%
Institutional	33	1%	752.9	5%	4	0%	4.73	1%
Mixed Use	2	0%	11.89	0%	0	0%	0	0%
Mixed Use - Primarily Commercial	10	0%	536.38	4%	2	0%	31.04	4%
Mixed Use - Primarily Residential	34	1%	565.62	4%	1	0%	2.13	0%
Municipal	107	2%	1083.4	8%	20	1%	34.58	4%
Open Space	139	2%	1833.03	13%	10	1%	17.02	2%
Recreational	5	0%	52.57	0%	0	0%	0	0%
Recreational Chapter 61B	8	0%	116.41	1%	2	0%	15.67	2%
Residential	5211	87%	6393.89	45%	1458	91%	638.35	80%
Residential - Housing Authority	4	0%	16.15	0%	2	0%	2.61	0%
Tax Title	3	0%	2.03	0%	0	0%	0	0%
Undeveloped	63	1%	905.85	6%	8	0%	6.38	1%
Vacant	311	5%	1179.11	8%	87	5%	33.27	4%
Vacant Chapter 61	3	0%	55.96	0%	0	0%	0	0%
Vacant Commercial	0	0%	0	0%	1	0%	0.34	0%
Grand Total	6006	100%	1601	100%	14357.29	100%	794.5	100%

Source: Westford FY21 Assessor’s data, received by NMCOG 9/23/2021, with last sale date as of 3/10/2021 (year built 2020). 9,521 records, 13 of which don’t link to Parcels_20210923 using LOC_ID.

In addition to the dimensional requirements of base zoning described above, the Town allows or requires a number of other housing development types through Special Permits and/or overlay districts as described below.

c. Open Space Residential Development (OSRD)

For all residential subdivision proposals submitted for parcels of ten or more acres or construction of a road exceeding 1,000 feet in the RA District, an application for an Open Space Residential Development (OSRD) must be filed. The minimum lot size for units subject to this provision is 20,000 square feet, with minimum frontage of 50 feet, and an average total aggregate frontage of 100 feet. These projects must provide no less than 10,000 square feet per dwelling unit or building lot of dry “Common Land”. In addition, developments must provide a minimum of one acre of land suitable to active and passive recreation, with some variations for larger developments or those located in an industrial zone. Most new residential subdivisions since 2012 have used the OSRD provisions, and as such, much of the Town’s land use patterns have been shaped by it.

Westford does not allow a “density bonus” or additional dwelling units in an OSRD. Projects may include no more than the same number of house lots that would be allowed in a conventional subdivision plan, but the bylaw does not specify how the maximum number of units will be established. It places responsibility on the developer to document the maximum number of allowable lots, “...based upon accepted standards of soil testing for sewage disposal systems on the individual lots, limitations due to wetlands, flood plains and steep slopes, and requirements of the Planning Board’s *Rules and Regulations Governing Subdivisions*”.

The OSRD Bylaw establishes minimum lot area requirements for lots in an OSRD plan (20,000 square feet). Section 7.1.2 of the bylaw (Applicability) states that it is applicable to all projects involving the construction of single-family residential units meeting the minimum requirements of the section. The bylaw further specifies OSRDs “shall be allowed on parcels of land[...] which are located within a residential district, and it also references the Industrial A (IA) and Industrial C (IC) districts. Therefore, at first glance, it would appear that it is intended for all residential districts (RA and RB) along with IA and IC, which the Table of Principle Use Regulations confirms.

However, in practice, this is not the case. The minimum lot area provides a benefit for districts requiring lots larger than 20,000 square feet such as RA, IA, and IC, because it provides a de-facto density bonus in those districts in exchange for preservation of open space. However, it does not provide the same benefit to RB districts, as 20,000 square feet is already the minimum lot size for that district. The only benefit it provides to development in RB districts is reducing minimum frontage from 100 feet to 50 feet.

Westford’s present zoning policies contemplate a blueprint for buildout that would divide almost ninety percent of the Town’s land into approximately one-acre (40,000 square foot) lots. While the OSRD and Flexible Development Bylaws encourage smaller lots and open space preservation, they are not designed to alter Westford’s overall buildout potential or to induce a fundamental rearrangement of future growth.

d. Flexible Development

As stated in the Zoning Bylaw, the Flexible Development Bylaw was created with the following goals:

- To encourage the preservation of open land for its scenic beauty and to enhance agricultural, open space, forestry, and recreational use;
- To promote the development of affordable housing for low, moderate, and median income families;
- To preserve historical and archeological resources, to protect the natural environment, including Westford’s varied landscapes and water resources;
- To protect the value of real property;
- To promote more sensitive siting of buildings and better overall site planning;
- To perpetuate the appearance of Westford’s traditional New England landscape;
- To facilitate the construction and maintenance of streets, utilities, and public services in a more economical and efficient manner;

- To offer an alternative to standard subdivision development; and
- To promote the development of housing for persons over the age of fifty-five.

Flexible Development projects may be created, whether a subdivision or not, from any residentially zoned parcel or set of contiguous parcels held in common ownership and located entirely within the Town of Westford. Sites permitted under the Flexible Development Bylaw that exceed five acres may apply for density bonuses. For age-restricted developments, one additional dwelling unit may be allowed for every two age-restricted units planned. Furthermore, for every three affordable units planned in a development, age-restricted or otherwise, the developer may apply for a density bonus that would allow for one additional market-rate unit.

The Flexible Development Bylaw mandates that the development contain at least 15% affordable units. These units must be split evenly between low income (< 60% AMI), moderate income (60% - 80% AMI), and median income (80% - 100% AMI). Affordable units must be integrated throughout the development and have no physical features that would distinguish them from market-rate units.

The *2009 Westford Comprehensive Master Plan* recommended that the existing affordable housing requirement be removed from the Flexible Development Bylaw and that the Town establish a new Inclusionary Zoning Bylaw, with clear density or other cost offsets that encourage the creation of affordable housing.

e. Senior Residential Multi-family Overlay District (SRMOD)

In an effort to create more housing opportunities for seniors, the Town adopted a Senior Residential Multi-family Overlay District (SRMOD). Unlike a traditional zoning district, this Overlay District is intended for properties to be added in response to proposals on a case-by-case basis. However, like all other zoning, these amendments must be passed at Town Meeting. The minimum lot area needed for inclusion in the district is five contiguous acres with a minimum frontage of 200 feet, minimum front yard setback of 75 feet, and minimum side and rear yard setback requirements of 100 feet. The number of dwelling units permissible must not exceed the lesser of one (1) bedroom per eight thousand (8,000) square feet or two (2) dwelling units per acre, and cannot exceed one hundred fifty (150) units total.

Similar to Flexible Development projects, developments included in the SRMOD must contain at least 15% affordable units. These units must be split evenly between low income (< 60% AMI), moderate income (60% - 80% AMI), and median income (80% - 100% AMI). Affordable units must be integrated throughout the development and have no physical features that would distinguish them from market-rate units.

f. Mill Conversion Overlay District (MCOD)

There are fifteen lots included in the Mill Conversion Overlay District (MCOD), as outlined in the Town's Zoning Bylaw, comprising the former Abbot Mill, Abbot Worsted Mill, Brookside Mill, and Sargent Mill. Brookside Mill and Abbot Mill have been converted into housing under this bylaw. The Planning Board may ensure the diversification of dwelling units within a MCOB by establishing the number of dwelling units with one, two, or three bedrooms; but not more than 10% can be three bedrooms. The number of

dwelling units allowed in a particular development included in the MCOB depends on several factors, including the waste management plan, expected traffic impacts, water resource impacts, and the number of affordable units provided above and beyond the 15% affordability requirement. MCOB developments must contain at least 15% affordable units. These units must be split evenly between low income, moderate income, and median income.

g. Assisted Living Facilities (ALF)

The Town’s Zoning Bylaw contains a provision for Assisted Living Facilities (ALF) that offer supportive services to individuals who are unable to live independently in the community. These facilities offer supervision and/or assistance with basic activities of daily life, such as dressing, bathing, and nutrition.

In the Residence Districts, the parcel on which the ALF will be located must have at least five (5) acres. In all other eligible districts, the minimum lot size applies. Applicants are encouraged to provide affordable units. These affordable units must be integrated into the overall development of the ALF so as to prevent the physical segregation of such units. For every three (3) affordable units, the applicant may add an additional market-rate unit. Bridges at Westford was constructed in 2012 on Route 110, adding 48 units for residents needing assistance with “memory care”. No projects have taken advantage of the provision for ALFs since 2012.

h. Zoning Analysis Conclusion

Westford’s current Zoning Bylaw has been revised and amended several times to better accommodate affordable housing development without sacrificing the Town’s trademark rural character. In particular, the following affordability requirements have been added to certain development types as summarized in Table 42. Although these each require 5% of total units to be affordable to each of low income, moderate income, and median income individuals or households in perpetuity, there are some small differences in language. For example, Senior Residential Multifamily Overlay District specifies fractional units shall be rounded down to the next lower integer, whereas the Mill Conversion Overlay District has no such specification.

Table 42: Affordability Component of Development Types

Development Type	Proportion of Units which Must be Affordable		
	Low Income	Moderate Income	Median Income
Flexible Development	5%	5%	5%
Senior Residential Multifamily Development	5%	5%	5%
Mill Conversion Project	5%	5%	5%
Assisted Living Facility	For every three (3) affordable units (affordable to 80% AMI for at least 30 years), the applicant may add an additional market rate unit.		

In addition, multi-family options have been included in Flexible Development, the SRMOD, conversion of existing dwellings, the possibility of use variances, or Special Permits related to nonconforming uses. That said, a majority of the newly constructed multi-family units in Westford have been in Comprehensive Permit projects. This may be because the multi-family provisions in the Zoning Bylaw are

limited to a very specific circumstance or have a process that includes uncertainty for developers such as Special Permit or Use Variance. However, Chapter 358 of the Acts of 2020 requires that the Town create a zoning district where multi-family housing is allowed as of right, or else be ineligible for certain state grants. The Town is currently examining the feasibility of allowing such uses in some areas along the Route 110 corridor or other areas that contain infrastructure or are areas of concentrated development. This may be either through creation or modification of a base district or through the use of an overlay district.

3. Infrastructure and Service Limitations

This section provides information on the sewer, water, and transportation infrastructure and identifies the limitations that present barriers to new residential development. This summary is based upon information within the Annual Town Report, the Water Department website, the *2009 Westford Comprehensive Master Plan*, and the *Northern Middlesex Regional Transportation Plan for 2020-2045*. While much of the remaining undeveloped land in Westford is limited by environmental factors, such as rock ledge, slopes, wetlands, and water access, there are also limitations due to the lack of sewer, and, at times, the service limits of the water system (75% of the community is served by the water system).

The transportation network, principally through access to Interstate 495, has provided advantages to Westford in attracting businesses and homeowners. However, there are some constraints related to the public transportation network. The Lowell Regional Transportation Authority (LRTA) provides one fixed bus route (Route 15) from Lowell through Westford on Route 110, terminating in Littleton at the IBM campus.

a. Sewer Capacity

The lack of a town sewer system has been identified as the primary constraint to new housing development in Westford. The Town of Westford made a policy decision in the 1990s to forego sewer in order to regulate the types of development that maintain the quality of life in the community. The Affordable Housing Committee and Affordable Housing Trust, both before and after their merger, have worked with their development partners to address this limitation by utilizing on-site facilities and new technologies. Large commercial and residential developments are served by private wastewater treatment facilities, while smaller developments use septic systems.

b. Water Supply and Protection

The Westford Water Department and Board of Water Commissioners are charged by the Town to provide safe, high-quality, uninterrupted water at a reasonable pressure. The Water Department must also adhere to water quality requirements established by the U.S. EPA and the Massachusetts Department of Environmental Protection (MassDEP). The Water Department operates two greensand filtration water treatment plants and nine drinking water supplies that serve 5,574 customers. The Water Department monitors Westford's compliance with federal and state environmental laws and maintains 139 miles of water mains, 1,100 hydrants and five water storage tanks with a combined storage capacity of 5.28 million gallons. The Water Department serves approximately 75% of Westford's

population, including residents, commercial and industrial buildings, and institutional and municipal offices.

In 2012, the Executive Office of Energy and Environmental Affairs (EEA) created the Sustainable Water Management Advisory Committee comprised of a wide range of stakeholders and supported by staff from the Department of Environmental Protection (MassDEP), the Department of Fish and Game (DFG), and the Department of Conservation and Recreation (DCR). Working with the Water Management Act Advisory Committee and the Water Resources Commission, the Committee advised EEA and its agencies on the development of a water allocation program that examined solutions to satisfying water needs while recognizing ecological issues, such as low stream flow.

On November 29, 2012, EEA released its *Sustainable Water Management Initiative: Final Framework*. A precursor to the revision of regulations under the Water Management Act (WMA), the framework represented over two years of research, stakeholder input, and public outreach. Permitting under the WMA now requires that new groundwater sources and/or increases in groundwater withdrawals from existing sources be evaluated for impact to stream flow.

The Sustainable Water Management Initiative (SWMI) framework describes the methodology for defining Safe Yield in each of the 27 watersheds in Massachusetts, as well as how stream flow criteria will be applied by MassDEP when issuing WMA permits. This framework guides MassDEP's permitting of water withdrawals under the WMA.

The new 600,000-gallon Prospect Hill Water Storage Tank was constructed in 2018 and went into service in 2019, adding 428,000 gallons of storage and fire protection capacity. Existing 1.5" and 2.0" galvanized steel main on Jonas and Emerson Roads was replaced with 8" ductile iron pipe in 2019. Twelve inch (12") ductile iron water main was installed on Route 40 between St. Augustine Drive to Long Sought For Pond in 2019. Approximately 5,700' of 8" water main on Kirsi Circle and Douglas Road, and approximately 350' of 6" water main was installed on Anderson Lane in 2020. The new main replaced existing 6" and 8" cast iron main that was the source of frequent breaks over the years. As of 2020, the Water Department added approximately 3 miles of water mains since the *Westford Housing Production Plan for 2017-2021*, adding 388 new accounts.¹⁸ In 2020 alone, the Westford Water Department added a total of 5 new hydrants, replaced 10 hydrants, added 58 new service connections/accounts, renewed or repaired 15 service connections, added 0.16 miles of water main, replaced approximately 1 mile of water main, and repaired 4 water main breaks.¹⁹

Figure 13 shows the amount of public water consumed in Westford from FY 2016 to FY 2020 in millions of gallons. The Water Department has a strong water conservation program and has estimated that it has saved 142 million gallons of water over the lifetime of their conservation improvements. MassDEP has established a limit of 4.2 million gallons per day and the Water Department's maximum consumption had been approximately 3.8 million gallons per day. There was actually a decrease in public water consumption from 2016 (569 Million Gallons Pumped - MGP) to 500 MGP or below until FY

¹⁸ "2020 Town of Westford Annual Report", Town of Westford, 2020

¹⁹ Source: Town of Westford Water Department

2020, when it increased to 544 MGP. Westford’s water conservation effort will help mitigate any increased demand, but the Town should continue to monitor the impact of new developments from both a water quantity and quality perspective.

Figure 13: Westford Water Consumption, Million Gallons Pumped (MGP) (FY2016-FY2020)

Source: Town of Westford

The Town has a Water Resource Protection Overlay District (WRPOD) to further protect its groundwater resources. The District is separated into three areas – I, II and III²⁰ – depending on the fragility of the water resource it is protecting. The purpose of the District is:

1. To promote the health, safety, and general welfare of the community by ensuring an adequate quality and quantity of drinking water for the residents, institutions, and businesses;
2. To preserve and protect existing and potential sources of drinking water supplies;
3. To conserve the natural resources of the Town; and
4. To prevent temporary and permanent contamination of the environment.

While this District doesn’t affect existing single-family dwelling units, in WRPOD II and III, a special permit is needed for “any building, structure, or use, other than a single-family dwelling with accessory structures and uses, to be served by on-site wastewater disposal system with a design capacity of greater than 10,000 gallons per day”. A special permit is needed when certain thresholds are surpassed by proposed developments.

c. Transportation Network

Westford is served by a regional transportation network comprised of several modes of transportation, including automobiles, buses, commuter rail, bicycles and pedestrians, and freight rail service. The roadway network is framed by its interstate highway network, consisting of Interstate 495 and Route 3, and included 170.54 centerline miles (344.86 lane miles) of roadway as of 2018.²¹ This roadway network ranges from the interstate highways to minor arterials (State Routes 110 and 40), to major collectors (Route 225 and Dunstable Road, for example), to local roads. The Town of Westford benefits

²⁰ WRPD I includes the Zone I area in conformance with 310 CMR 22.00; WRPD II includes area of aquifer that contributes to public water supply well or wellfield (Zone II) and WRPD III reflects DEP Zone III locations.

²¹ Source: 2018 MassDOT Inventory Year End Report

economically from its well-structured roadway network, attracting homeowners and private investors to the community.

Westford is served by the Lowell Regional Transit Authority (LRTA) with one fixed route, Route Number 15, which provides service along Route 110 in Westford. A map of the bus route is included in Appendix A, Map 6. Paratransit service for seniors and the disabled is available through the LRTA Roadrunner service. The Town's Council on Aging (COA) also provides on demand van service to the senior and disabled population. Westford residents and workers are served by two commuter rail stations located in Lowell and Littleton.

In addition to roadways and public transit, bicycle and pedestrian facilities are an important component of the transportation network. The opening of the Bruce Freeman Rail Trail in 2009 has provided a popular facility for bicyclists and walkers. Expansion of 7.4 miles of the trail have been completed in the last several years, and another project is anticipated to be complete in 2022. Once this is finished, it will provide 16 miles of continuous trail between Lowell and Concord. The rail trail will eventually be expanded into Framingham.

Other amenities for bicyclists and pedestrians are somewhat limited, creating situations where residents must utilize their automobiles instead of walking or using their bicycles. The Town's Pedestrian Safety Committee is active in improving the pedestrian and bicycle network throughout town. In 2015, the Town adopted a Complete Streets policy and Prioritization Plan, which encourages a network that accommodates all modes of travel. For example, the Boston Road Transportation Improvement Project, set to begin in 2023, will require painted bicycle lanes on both sides and a sidewalk on one side of the roadway, where presently there are neither. Westford's newly established Department of Public Works also incorporates pedestrian and bicycle accommodations into infrastructure projects whenever feasible.

III. Affordable Housing Goals and Strategies

The Town of Westford Affordable Housing Trust Committee’s Housing Production Plan Subcommittee held several meetings and work sessions to develop goals and strategies that will result in the creation and preservation of affordable housing units in Town. The result is a set of measurable and achievable goals and actions that are clear, inclusive, comprehensive, and forward thinking. These measures will serve as a roadmap for the Town to use in developing affordable housing over the next five years.

IV. Affordable Housing Goals and Strategies

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A. Housing Goals

Housing Goals are aspirational guidelines including related trackable performance measures to determine whether the Town is advancing each goal.

- 1. Environmentally Sustainable Housing:** Ensure current and new housing is consistent with the Town’s Climate Action Resolution (2020) to move towards net-zero greenhouse gas emissions by 2050. Housing should implement strategies laid out in the November 2021 Westford Climate Roadmap, specifically those sections governing the reduction of greenhouse gas emissions in residential buildings.
Measure: Number of existing and new affordable units that have advanced the strategies of the November 2021 Westford Climate Roadmap
- 2. Housing for the Lowest Income Residents:** Create and preserve affordable housing at levels at or below 80%, with a special emphasis to provide housing to people who make at or below 60% of the Area Median Income (AMI) throughout the Town to support socio-economic and racial diversity, equity, and inclusion.
Measure: Number of units affordable to people who make at or below 60% AMI
- 3. Housing for Seniors, People with Disabilities, and Sober Housing:** Create and preserve housing targeted toward special populations below the AMI, including seniors aged 55 years of age or older, people with disabilities, and people recovering from addiction; this may include a focus on single-level living, group housing, and/or supportive housing.
Measure: Number of affordable units restricted to or targeted at seniors or people with disabilities or units offering support or special accessibility to those populations
- 4. Housing for Workforce:** Create and preserve diverse housing units for households at 80-120% of the AMI to support economic development initiatives and broaden the range of potential home-

buyers, including a wide variety of housing types for young adults, families, and for families that need three or more bedrooms.

Measure: Number of units affordable to those at 80-120% of AMI, types of units including geographic location, building typology, ownership and rental units, and number of bedrooms

5. **Housing for Those Currently or at Risk of Becoming Unhoused:** In keeping with the State’s “Housing First” priority, provide affordable rental units for families suffering from homelessness in Westford by coordinating with programs like those offered through the Westford Housing Authority and Community Teamwork, Inc.

Measure: Number of units provided to those currently unhoused or at risk of becoming unhoused

6. **Promote Sustainable Development Patterns:** Support the goals of M.G.L. Chapter 40A Section 3A as created in the Housing Choice Act by reducing barriers to multi-family housing near existing infrastructure and community services such as along Route 110, along Route 40, and in appropriate scales near areas of concentrated development.

Measure: As of right multi-family unit capacity of zoning in appropriate geographic areas.

7. **Continue to Update Permitting and Ordinances for Ease, Consistency, and Flexibility:** Continue to coordinate the work of Town boards and departments with permitting responsibilities in order to achieve greater consistency in the interpretation and administration of local requirements, ensuring that they are fair, clear, consistent, and aligned with the goals of the Town’s Comprehensive Master Plan.

Measure: Ordinances and permitting procedures reviewed and amended as necessary

8. **Town Board, Committee, and Public Education:** Vigorously continue to promote outreach and education to Town Boards, Committees, and the general public, which includes the definition, promotion, understanding, and appreciation of affordable housing.

Measure: Number of people reached by educational materials

9. **First Time Homebuyer Education:** Provide education to buyers of affordable units including the principles of home ownership, deed restrictions, escrow for maintenance and repair, condo association budgeting, special assessments, other increasing expenses, and the good governance responsibilities of trustees.

Measure: Number of homebuyers reached by educational materials

10. **Promotion of Rental Units:** Given that rental units provide an affordable alternative to home ownership that does not require down payments, maintenance costs, or other costs related to home ownership, promote developments that provide quality and ecologically sustainable rental units at affordable rates.

Measure: Number of rental units as a share of overall housing in Westford

11. **Grow Partnerships:** Partner with public, private, non-profit, and other organizations (such as private developers, Habitat for Humanity, CHOICE, Inc., etc.) to promote additional affordable

housing opportunities.

Measure: Number of shared initiatives

12. **Monitor and Report Progress:** Monitor and chart the progress of affordable housing production to ensure that the Town is meeting annual production goals.
13. **Sustainable Development Principles:** Encourage housing development in Westford to adhere to the Commonwealth's Sustainable Development Principles (see Figure 14).

B. Priority Housing Strategies

Housing Strategies are concrete actions the Town should undertake in order to achieve the goals listed in the previous sub-section. The following strategies are major initiatives for the Town to undertake during the HPP's period of performance. These are larger, more overarching strategies than the strategies listed in the following sub-section and will be treated as priorities.

1. **Multi-family Housing Zoning Bylaw:** Actively pursue adoption of a zoning bylaw amendment to address the requirement pursuant to M.G.L. Chapter 40A Section 3A for a district that permits multi-family housing as of right. To the degree practical, the Town shall strive to incentivize the types of residential development needed to address the goals of this Housing Production Plan and to preserve Westford's Subsidized Housing Inventory. This may include evaluation of an affordable housing requirement within the amendment and ensuring its compatibility with the zoning bylaw's other affordable housing requirements (see also **Additional Housing Strategy 1a**).
2. **Accessory Dwelling Units Zoning Bylaw:** Pursue amendments to the zoning bylaw to simplify permitting for Accessory Dwelling Units (ADUs).
3. **Analyze the Town's SHI:** Examine Westford's SHI to assess the following information:
 - a. What proportion of the units on the SHI are restricted as affordable in perpetuity?
 - b. How many SHI units have non-permanent affordability restrictions and when would they expire?
 - c. What proportion of units included on the SHI are rental units versus home ownership?
 - d. What proportion of units included in the SHI are actually subject to affordability restrictions? (i.e., affordable in fact versus market-rate units)
 - e. What proportion of SHI units are restricted at 80% AMI? 60% AMI? 50% AMI or lower?

Figure 14: Commonwealth of Massachusetts's 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*

Based on results, suggest specific goals that target perceived shortcomings. Focus support on projects that address the greatest housing needs as identified in the Housing Production Plan.

C. Additional Housing Strategies

1. Policy and Regulatory Reform

- a.** Consider and develop an Inclusionary Zoning article in the Zoning Bylaw that would enhance the consistency of affordable unit development in the Town of Westford, provide additional flexibility in creating or funding units, and standardize requirements to the extent possible, meeting the goals enumerated in the *2009 Comprehensive Master Plan*. This should include consideration of the following:
 - Revise the Flexible Development Bylaw to increase affordability requirements and consider adding similar affordability requirements to the OSRD Bylaw;
 - Revise the Mill Conversion Overlay District Bylaw to update the affordability requirements;
 - Revise the Senior Residential Multifamily Overlay District Bylaw to increase affordability requirements;
 - Consider developing and adopting an option to donate to the Affordable Housing Trust (AHT) as part of special permit approval in lieu of building affordable units; and
- b.** As part of—or in addition to—the requirements pursuant to M.G.L. Chapter 40A Section 3A, strengthen the zoning bylaw's flexibility and predictability to increase density in areas in which it would be appropriate to encourage housing creation to meet demand while maintaining or enhancing quality of life through the following measures:
 - Allow upper-story residential units in the Business and Limited Business Districts and reduce the required lot sizes to reflect existing neighborhood character and reduce the number of non-conforming lots;
 - Consider changes to the zoning bylaw to allow town house and small-scale multi-family housing types as uses in residential districts through a Special Permit;
 - Allow duplexes in residential districts through a Special Permit;
 - Extend the Mill Overlay District to include neglected commercial properties; and
 - Explore the creation of a mixed-use overlay district that could allow for repurposing of commercial properties impacted by changing work and shopping patterns exacerbated by the COVID-19 pandemic;
- c.** Evaluate and revise existing development regulations and guidelines for fairness and efficiency. At the initial public hearing for a Comprehensive Permit project, the ZBA evaluates the need for outside peer review with cost estimates and may, at that time, require submittal of fees based on the need for outside peer review. If those fees were waived or reduced to be consistent with the size of the project, it may lessen the burden on the developer and allow for issues to be identified and addressed early on in the process.

- d. Coordinate planning efforts for open space, economic development, and affordable housing initiatives among the following boards and commissions: Planning Board, Select Board, Conservation Commission, Affordable Housing Trust Committee, Housing Authority, Historical Commission and Community Preservation Committee, and the Tax Possession Sales Committee around land acquisition to identify priority parcels for preservation, economic development, and the creation of affordable housing. Consider establishing a Land Use Priorities Committee with a representative from the Affordable Housing Trust Committee.
- e. Update the *Zoning Board of Appeals Comprehensive Permit Rules and Regulations* ensuring it is complete and consistent with the *2009 Westford Comprehensive Master Plan*, this Housing Production Plan, the *DHCD Chapter 40B Handbook for Zoning Boards of Appeal*, and other current DHCD 40B regulations and guidelines.
- f. Support legislative and/or regulatory reforms at the state level that recognize the efforts of communities like Westford to proactively serve households at 80-120% of the area median income (AMI), a demographic with demonstrated housing need in Westford and the region. This is in addition to continued efforts to support households earning below 80% of the AMI.
- g. Create or support a mechanism to review and ensure proposed fees, such as condo fees, are properly calculated and advertised to account for the lifecycle of the project and include sufficient accounting for required capital improvements, long-term maintenance, and rising utility costs.

2. Education

- a. Make training and educational opportunities on affordable housing and fair housing available for Town Board and Committee members and staff. This could include updates on current policies to support affordable housing and any revisions to state law or regional opportunities. This will allow boards and committees to provide guidance to the development community to improve quality of proposals and could result in a more expedited permitting process.
- b. Connect interested property owners in Westford to training, educational opportunities, and other resources that would provide support, encouragement, and funding for developing affordable housing or participating in affordable housing programs, paying special attention to smaller property owners who may be interested but lack the experience or resources of larger developers.
- c. Increase public awareness of and support for affordable housing through increased outreach and public education, including close coordination with the Town's Veterans Service Officer/Veterans Agent and the League of Women Voters.
- d. Provide education to buyers of affordable units including the principles of home ownership, deed restrictions, escrow for maintenance and repair, condo association budgeting, special

assessments, other expenses which may change over time, and good governance responsibilities of trustees.

- e. Research and promote First-Time Homebuyer Program opportunities in the region and state to make existing homes more affordable. Connect households to resources through Community Teamwork, Inc. (CTI), Habitat for Humanity, the Coalition for a Better Acre (CBA), and the Merrimack Valley Housing Partnership (MVHP).
- f. Research and identify Foreclosure Assistance Programs in the region and State to help homeowners avoid foreclosure. Connect households to resources like the State’s Emergency Homeowners Loan Program (EHLN) and Community Teamwork, Inc.

3. **Expand Housing Opportunities**

- a. Encourage development of more affordable rental housing.
- b. Promote affordable senior housing units and, in particular, those that support “aging in place²²”.
- c. Address the local need for affordable family ownership housing, primarily 3- and 4-bedroom units.
- d. Continue to support development of workforce housing units. These units are defined as those projects that serve residents between 80-120% Area Median Income (AMI). While they don’t count toward Westford’s subsidized housing inventory, they do meet a demonstrated need in Westford and the region.
- e. Set aside Community Preservation Act (CPA) Funds to provide down payment assistance to families purchasing affordable homes.
- f. Support group homes and other housing options that accommodate those with all types of disabilities, veterans, seniors aged 55 years of age and older, and those recovering from addiction, through partnerships with state funding agencies and non-profit entities.

4. **Local and Regional Programs and Collaboration**

- a. Examine ways for the Town to accept private contributions in support of affordable housing.
- b. Continue to participate in the 495/MetroWest Partnership’s *495/MetroWest Development Compact Plan*, which supports the continued production and preservation of housing for households at 80-120% of the AMI, and is creating a shared framework for state, regional, and

²²Aging in place is the ability to live in one's own home for as long as possible. While this is often associated with access to services and healthcare, constructing housing units that allow seniors to remain in their home as they age is of critical importance to maintaining their independence and mobility. For additional information consult <http://www.seniorresource.com/ageinpl.htm>

local strategies for priority development and land preservation, as well as transportation and other infrastructure investments in the 37 municipalities.

- c. Research and consider establishment of local property tax abatement programs for low-income seniors and veterans and promotion of existing tax relief available in Massachusetts, including but not limited to the tax abatement for veterans with disabilities.
- d. Explore innovative affordable housing ideas and policies such as Community Land Trusts (CLTs) with local and regional partners and support those initiatives if appropriate for Westford

V. Housing Production Plan Implementation Requirements

The Westford Affordable Housing Trust Committee (AHTC) built off previous planning efforts in Town²³ to identify implementation measures to guide the development of affordable housing in the Town over the next five years. These measures include the Town’s desired characteristics for new residential or mixed-use developments, ideal locations for affordable housing on privately- and publicly-owned land, and the regional partnerships necessary to accomplish the goals set forth in this Housing Production Plan.

A major activity to be undertaken by the AHTC and Town staff will be to work toward compliance with the requirements in M.G.L. Chapter 40A Section 3A, also known as the Multi-Family Zoning Requirement for MBTA Communities. To the degree practical, the Town shall strive to incentivize the types of residential development needed to address the goals of the Housing Production Plan, and to preserve its Subsidized Housing Inventory (SHI).

A. Guidelines for Proposed Residential or Mixed-Use Developments

In 2004, the Town of Westford adopted the *Zoning Board of Appeals Comprehensive Permit Rules and Regulations*. This document was amended on October 20, 2004 and April 16, 2008. It provides information to guide developers in creating proposals that will meet Westford’s goals, recognizing site and neighborhood uniqueness.

This HPP seeks to complement that document, providing “characteristics of proposed residential or mixed-use developments” in compliance with 760 CMR 56.03(4)(d). Residential development should strive to balance multiple and sometimes conflicting considerations. The Affordable Housing Trust Committee (AHTC) recommends that proposed residential and mixed-use developments should embody the following primary principles:

1. **Proactive Posture:** A diverse housing option mix, spanning a range of prices and rental/ownership models, is seen as a positive driver of the town’s quality of life and vitality. Adding more two- and three-bedroom apartments is a particular focus.
2. **Energy Conservation:** In keeping with ecological concerns and to help lower the cost of renting and ownership, energy conservation should be incorporated into development plans, including but not limited to:
 - Air leakage control – tight weatherization and heat recovery ventilation
 - High insulation – walls, roof and foundation
 - High-efficiency heating system and controls – high efficiency furnace/boiler, programmable thermostats
 - Glazing – high efficiency, with heat mirrors
 - Solar – Passive and active

²³ Efforts included the Multi-Family Zoning along Route 110 Study, conducted by NMCOC through the use of District Local Technical Assistance (DLTA) funds, the Westford Housing Production Plan for 2017-2021 and the 2009 Westford Comprehensive Master Plan.

- Appliances – Energy Star and/or High Efficiency appliances in individual dwelling units and common areas, e.g., laundry room and common recreation areas
- Lighting – High efficiency interior lighting, adjustable, maximize natural light
- Heat island reduction – When appropriate, use existing plant material, installation of plant material, or other architectural interventions that provide shade over paved areas and use heat-reflective roofs or other measures that reduce the urban heat island effect

3. **Sustainable Measures:** Apart from energy conservation, principles that promote ecological sustainability should be followed whenever possible, especially if they would lower the long-term cost of ownership and/or maintenance for tenants:

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

4. **Quality and Responsibility to Future Tenants** – The proposed development’s design elements must afford residents a high-quality product and a low cost of ownership and/or maintenance. Submitted plans are expected to represent a quality implementation, with construction materials and methods representing best practice.

5. **Mixed Uses** – Despite most zoning districts in Westford not allowing a mix of uses with limited exceptions, in some circumstances, it may be appropriate to encourage affordable housing options within commercial districts or limited convenience-type commercial operations within residential districts. The objective, when appropriate, is to afford residents ready access to shopping and other amenities, thus reducing automobile dependence.

6. **Conversion of Existing Structures** – Mill conversions are encouraged. Such conversions not only capitalize on existing large structures without increasing the apparent structural density of the

neighborhood, but they preserve part of the town’s history and legacy. The same principle applies to schools, large barns, and similar historic structures, should they become available.

7. **Distribution vs. Concentration** – In most cases, concentrating affordable and high-density developments in any one area is to be avoided. Distributing small-scale developments throughout the town is more likely to minimize local impact and to contribute to aesthetics and community development balance. Exceptions may be allowed for well-designed implementations that are compatible with unique characteristics of the immediate area such as isolation, topography or soil conditions, or for those that are located in heavily developed commercial or industrial districts.
8. **Visual Screening** – Development designs should incorporate site-appropriate buffers, berms, plantings, and other transitional screening design devices to integrate the proposed development into the neighborhood with minimum visual impact. Such design elements should maximize aesthetics for both the development residents and their neighbors.
9. **Community Amenities** – Including spaces that promote social activities and community interaction, appropriate to the proposed occupancy demographic, is highly encouraged. Examples might include parks, meeting spaces, walking trails, and/or a recreation area, especially when children might be expected to be an important population, either as residents or visitors. Access or extensions to existing amenities such as sidewalks and bicycle and walking trails, is also encouraged. The developer may provide additional amenities, such as transportation to retail areas.
10. **Accessibility** – Design of units and facilities to be accessible to persons with disabilities is required.

The following strategies proposed by the AHTC are also recommended for the Town’s future affordable housing projects:

- Create and preserve compatible and complementary affordable housing by ensuring that new development and rehabilitation and retrofits of existing buildings are consistent with surrounding homes and neighborhoods in density, scale, and design;
- Improve connections and access between residential neighborhoods, community services, and Town infrastructure;
- Provide sidewalks, bicycle paths, and attractive streetscapes; and
- Preserve historic structures.

B. Proposed Modifications to Zoning Districts to Create SHI-Eligible Housing

This section describes “the identification of zoning districts or geographic areas in which the municipality proposes to modify current regulations for the purposes of creating SHI Eligible Housing developments to meet its housing production goal.”²⁴

to meet its housing production goal.”²⁴

This evaluation started with a review of districts in which it is legal to build housing. As described in Table 38, most districts in Westford allow for single-family dwellings with the exception of Limited Business (BL), Commercial Highway (CH) and Highway Industrial (IH) (see Zoning Map in Table 2 in the Appendix). However, residential development options such as Flexible Development, Mill Conversion, and Assisted Living Facilities are allowed by Special Permit in additional zoning districts: Flexible Developments are limited to the Residential, Industrial A, and Industrial C Districts. Mill Conversions are only permitted in the Mill Conversion Overlay District. Assisted Living Facilities are allowed by Special Permit in most districts. Senior-restricted housing is allowed in an overlay district as designated by Town Meeting. Of these, Flexible Development, Senior Residential Multifamily Development, and Mill Conversion require 15% of units to be affordable spread between very low income, low income, and moderate income households, and Assisted Living Facilities may have one bonus market-rate unit for every three affordable units.

In order to adhere to the goals of creating a mix of housing types near Town services and infrastructure, the AHTC chose the following districts and areas in which to explore affordable housing development:

- Near existing areas of concentrated development such as Westford Center, Graniteville Village, and Forge Village;
- In distressed or underdeveloped areas near appropriate infrastructure;
- Along Route 110 – Zoned Commercial Highway and Highway Industrial; and
- Along Route 40 – Zoned Residential A, Residential B, Business and Industrial A.

Potential zoning changes are needed to allow the above housing by Special Permit or as of right. Furthermore, zoning changes are needed to accomplish other goals as enumerated in the last section, especially **Goal 6**, the promotion of sustainable development patterns. These changes include:

- Create a new district or overlay district, or adjust an existing district to include as of right multi-family zoning to address the requirement pursuant to M.G.L. Chapter 40A Section 3A for a district that permits multi-family housing as of right (see **Priority Strategy 1**). This may involve modifying or creating an overlay over:
 - Industrial Highway,
 - Commercial Highway,
 - Portions of Residence A along Route 40 and Route 110,
 - Portions of Industrial A along Route 40 and near Graniteville Village, and
 - Portions of Residence B as appropriate.
- Revise the zoning bylaw to simplify and streamline permitting for Accessory Dwelling Units (ADUs), including evaluation of permitting ADUs as of right with conditions and/or adjusting the standards to be more permissive (see **Priority Strategy 2**).

²⁴ In compliance with 760 CMR 56.03(4)(d)

- Evaluate Inclusionary Zoning levels and make it consistent across development types such as OSRD, Flexible Development, Mill Conversion, and Senior Residential. This may include creating a separate Inclusionary Zoning article in the zoning bylaw. Development types, zoning districts, or zoning overlay districts that require affordable housing could then reference this article (see **Additional Strategy 1.a**).
- Evaluate whether districts or portions of districts could support additional density appropriate to neighborhood scale and existing infrastructure. This evaluation should include other districts in addition those created or modified to be compliant with the requirement pursuant to M.G.L. Chapter 40A Section 3A. This evaluation should include:
 - Permitting smaller minimum lot size for single-family detached homes in Residence B or Business,
 - Mixed-use as of right right in Business,
 - Small-scale multi-family structures or townhouses by special permit in Residence B or Business, and/or
 - Allow duplexes in residential districts through a Special Permit (see **Additional Strategy 1.b**).

C. Privately-Owned Land with Potential for Affordable Housing

In meeting the DHCD requirement to identify potential affordable housing sites, the Westford Housing Production Plan Subcommittee of the AHTC 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. NMCOC staff also conducted site visits to identify the development limitations of the identified properties, which are included under the characteristics/site constraints column of Table 43 and Table 44. Finally, the Conservation Resource Planner evaluated and provided input into the list.

As shown in Table 43, 13 privately-owned sites were identified. 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 (**Additional Strategy 1.c**), 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 Map 2 shows the location of these parcels in relation to the current zoning and overlay districts. Map 3 highlights the Wetlands, Floodplains, and Rivers Protection Act (RPA) Regulated Areas, and Map 4 shows the water infrastructure related to the parcels. Map 5 outlines the LRTA bus routes and commuter rail stations in Lowell and Littleton.

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

Site	Acres	Current Use	Characteristics/ Site Constraints	Zoning District	Zoning Amendment Needed? (Y/N)
31 Bridge Street	5.99	Industrial/ Commercial	<ul style="list-style-type: none"> Structures in disrepair Pockets of wetlands 	IA	Y
35 Bridge Street	1.00	Industrial/ Commercial	<ul style="list-style-type: none"> Structures in disrepair Currently for sale 	IA	Y
35Y Bridge Street	1.00	Industrial/ Commercial	<ul style="list-style-type: none"> Structures in disrepair 	IA	Y
3 & 5 Broadway Street	0.491	Residential/ Commercial	<ul style="list-style-type: none"> Occupied residential unit at 5 Broadway Concrete block building at 3 Broadway contains 2 residential units, unknown occupancy 	B	N
69 Broadway Street	6.6	Mixed-use: contractors, services and offices	<ul style="list-style-type: none"> Possible environmental issues Limited parking 	IA (MCOD)	N
Cold Spring Road	39.1	Forest - Chapter 61	<ul style="list-style-type: none"> Steep in areas Pockets of wetlands and stream Heavily wooded 	RA	N
427 Groton Road	13	Single-family	<ul style="list-style-type: none"> Structure on property Buildable Stream crossing required 	RA	N
210 Littleton Road	19.98	Commercial	<ul style="list-style-type: none"> Office building/campus Recently renovated in 2017 	CH	Y
250 Littleton Road	16.43	Swim and Tennis Club	<ul style="list-style-type: none"> Back of lot is open water and steep Seasonal use 	CH	Y
10 North Main Street	.8517	Empty mill building	<ul style="list-style-type: none"> Possible environmental issues May be redeveloped by owner 	IA (MCOD)	N
49 North Main Street	63.6	Quarry	<ul style="list-style-type: none"> Topography Potential wetlands 	RA; portion in RB	N
0 North Main Street	5.55	Quarry	<ul style="list-style-type: none"> Adjacent to 49 No. Main Street, providing access to the larger parcel 	RB; portion in RA	N
0 Tyngsboro Road	42.45	Quarry	<ul style="list-style-type: none"> Wetlands 	RA	N

Source: Westford Housing Production Plan for 2017-2021, NMCOD Analysis, Westford Affordable Housing Trust Committee HPP Subcommittee Priority Parcel Work, January 2022

* Zoning Districts Key: RA – Residence A, B – Business, CH – Commercial Highway, IA – Industrial A, MCO – Mill Conversion Overlay District

D. Publicly-Owned Land with Potential for Affordable Housing

The Affordable Housing Trust Committee identified two (2) publicly-owned potential housing sites that could provide 30-50 additional affordable units to the SHI Inventory, depending on average unit size of a possible Mill Conversion of one of the properties. The sites outlined in Table 44 have various constraints to being developed, including advanced state of disrepair of historic buildings, environmental issues, 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. It should be noted that 35 Town Farm Road is included in the pipeline of projects, but has not yet been developed. Until the development is finalized, this site remains on the list of publicly-owned land with potential for affordable housing.

Map 1 in the Appendix shows the location and distribution of these parcels throughout the community, while Map 2 shows the location of these parcels in relation to the current zoning and overlay districts. Map 3 highlights the Wetlands, Floodplains, and Rivers Protection Act (RPA) Regulated Areas, and Map 4 shows the water infrastructure related to the parcels. Map 5 outlines the LRTA bus routes and commuter rail stations in Lowell and Littleton.

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

Site	Acres	Current Use	Characteristics/ Site Constraints	Zoning District	Zoning Amendment Needed? (Y/N)
12 North Main Street	0.99059	Abandoned mill building in disrepair	<ul style="list-style-type: none"> • Environmental issues • No septic system • Building has no roof 	IA (MCOD)	N
35 Town Farm Road	0.675	Recreation Department Office	<ul style="list-style-type: none"> • Unknown 	RA	N

Source: Westford Housing Production Plan for 2017-2021, NMCOG Analysis, Westford Affordable Housing Trust Committee HPP Subcommittee Priority Parcel Work, January 2022

* Zoning Districts Key: RA – Residence A, B – Business, CH – Commercial Highway, IA – Industrial A, MCOD – Mill Conversion Overlay District

E. Participation in Regional Collaborations that Address Housing Development

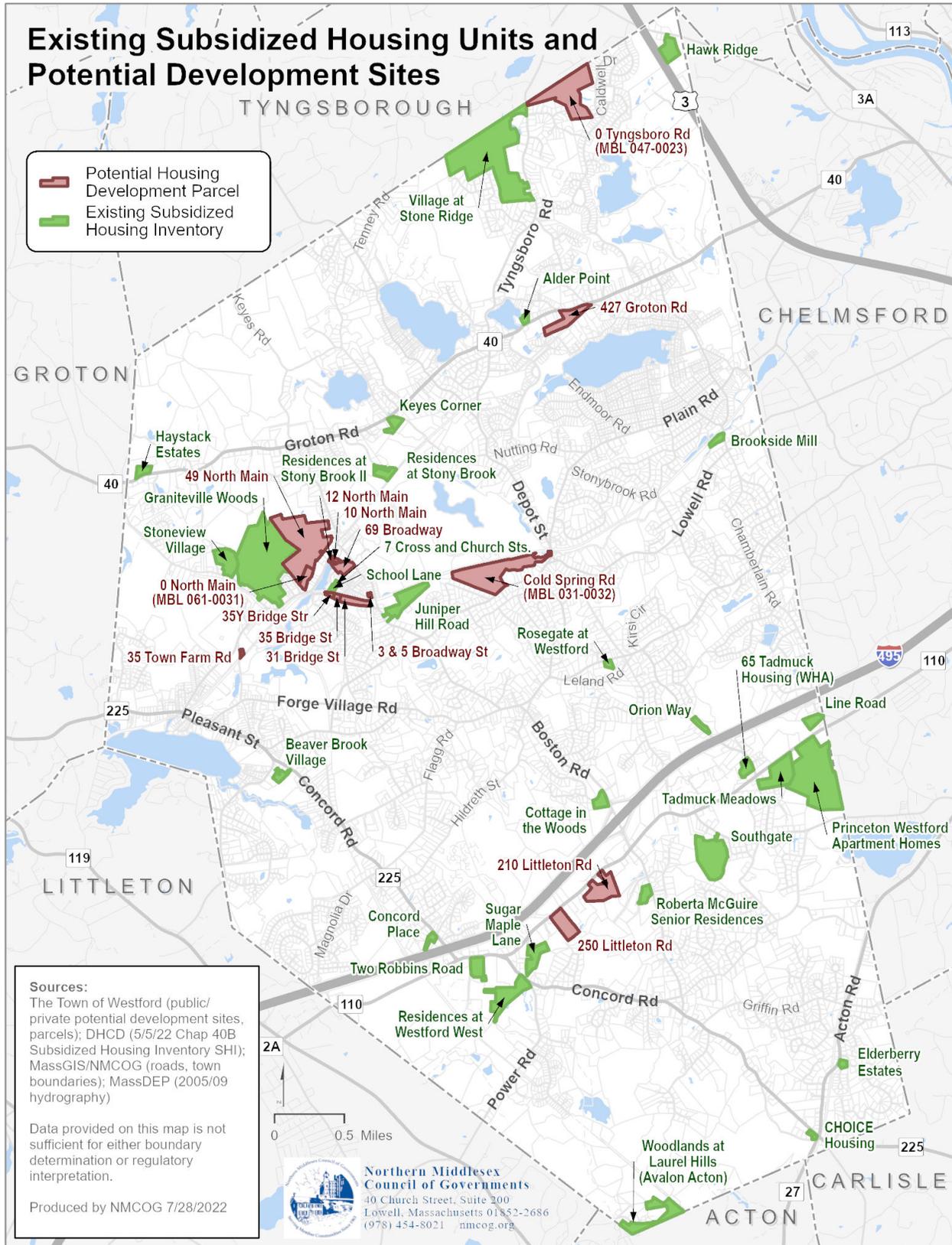
Westford is proposing to investigate the following avenues to participate in regional efforts to develop affordable housing in the Greater Lowell region:

- Investigate and promote the resources available through the Common Ground Development Corporation, the non-profit development arm of Community Teamwork, Inc.; Habitat for Humanity; Merrimack Valley Housing Partnership (MVHP); and the Coalition for a Better Acre (CBA);
- Continue to participate in the 495 MetroWest Partnership's Development Compact Plan;
- Participate in the Middlesex 3 Coalition, especially as it relates to developing and marketing housing opportunities;

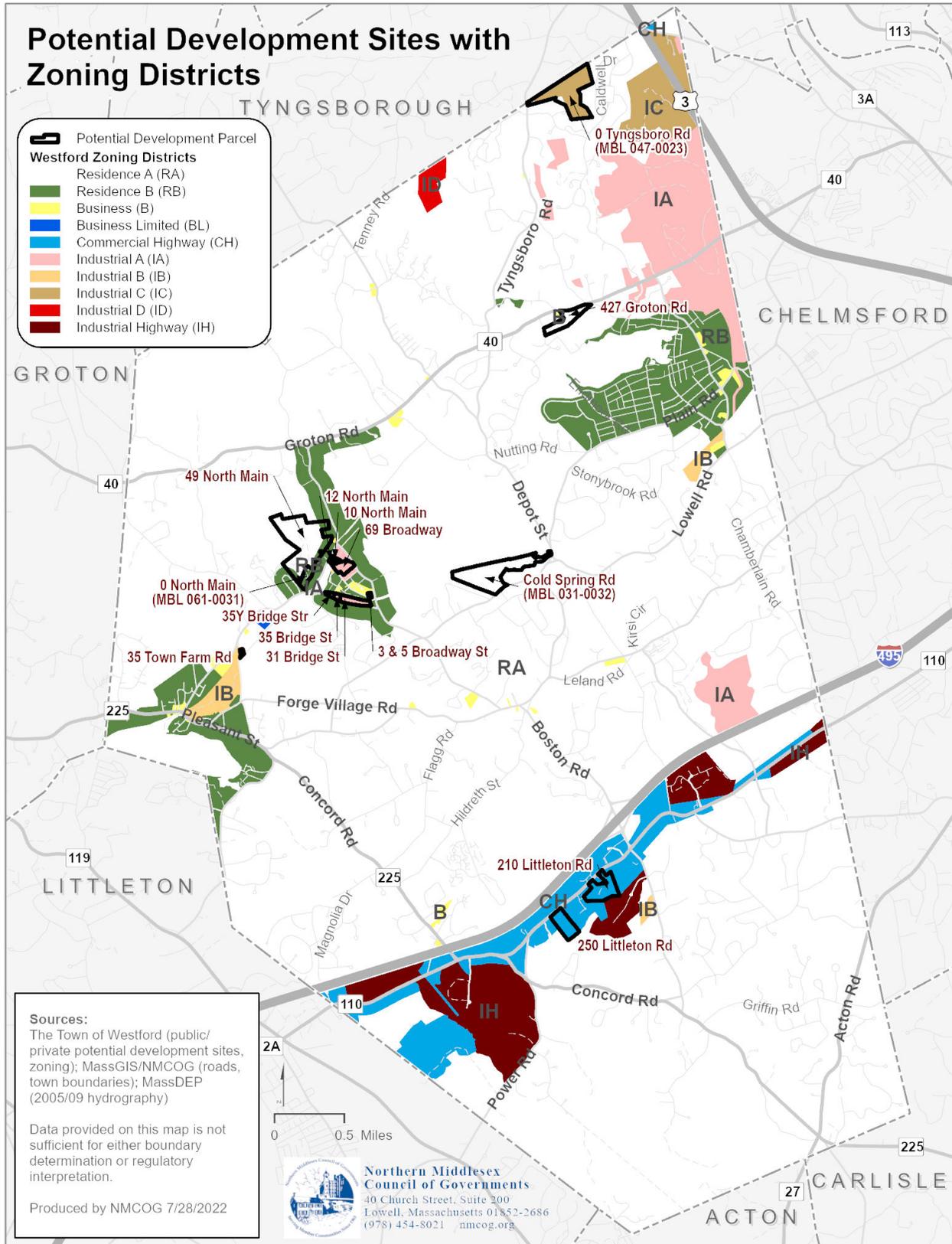
- Participate in the Merrimack Valley Regional Network to End Homelessness or similar organizations which include several towns in the region;
- Continue coordination with the Chelmsford Housing Authority; and
- Work with NMCOG and other representatives in the region as part of the Regional Housing Workgroup and to develop a Regional Housing Plan.

Appendix: Maps

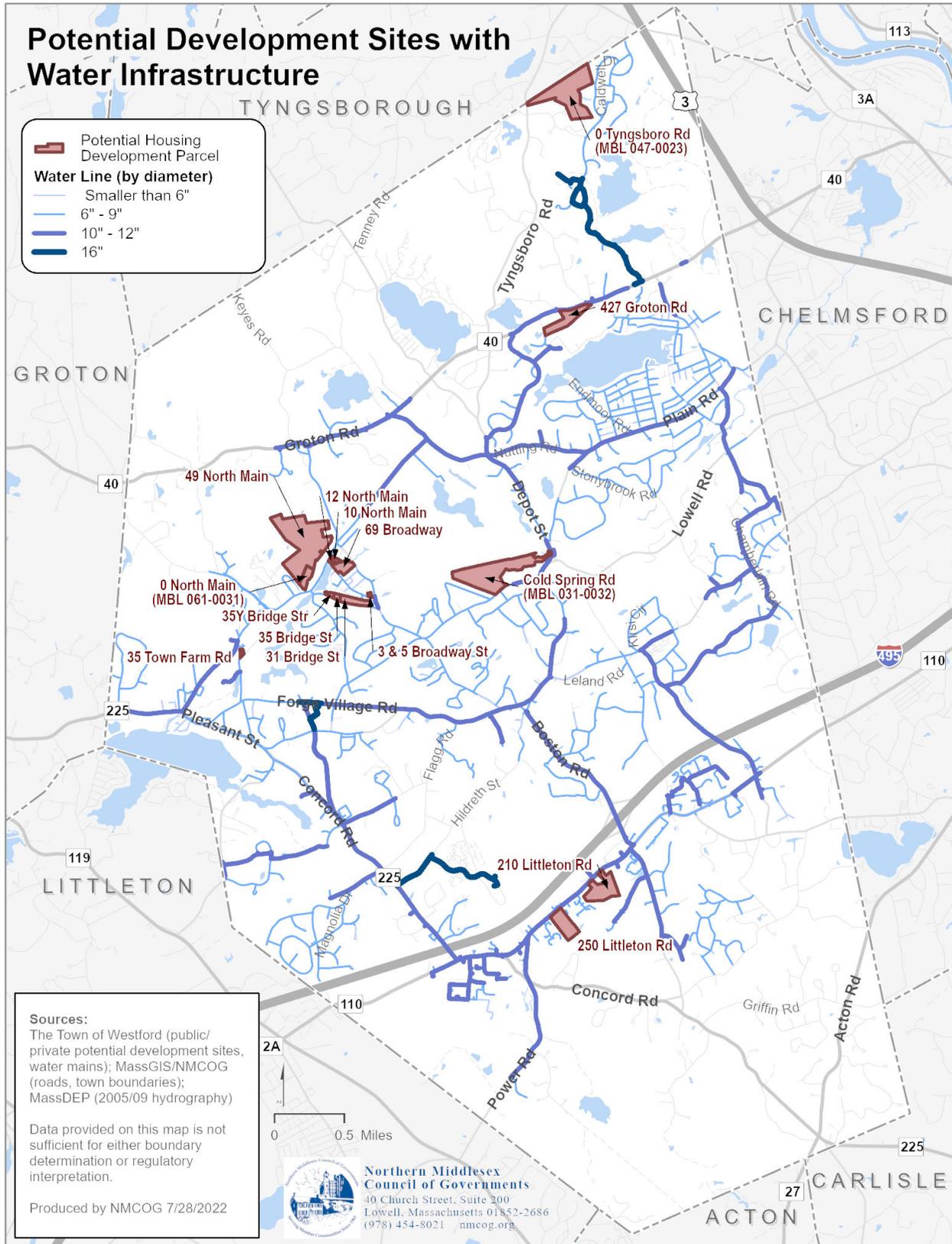
Map 1. Existing Subsidized Housing Units and Potential Development Sites



Map 2. Potential Development Sites with Zoning Districts



Map 3. Potential Development Sites with Water Infrastructure



Map 4. Potential Development Sites with Wetlands, Floodplains, and RPA Regulated Areas

