

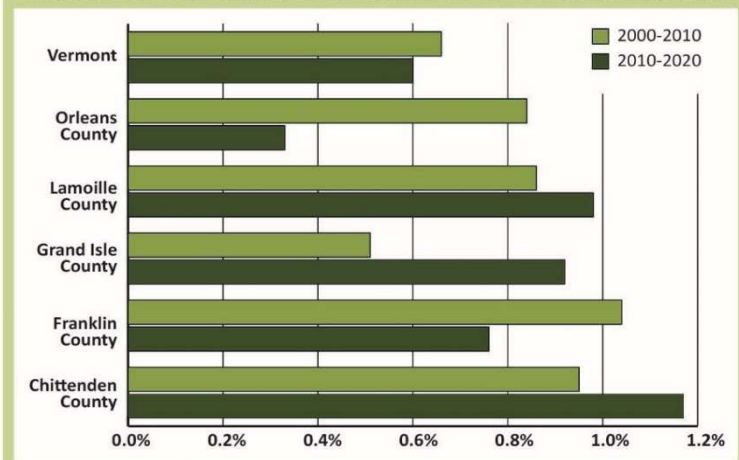
HOUSING

GOALS

1. Build and improve more homes so that high-quality, safe, and affordable housing options are equitably available to all current and future residents consistent with housing targets.
2. Ensure housing is easier to build in centers, village areas and planned growth areas~~regional and sub-regional growth areas and village centers~~ that are convenient and accessible to employment, services, retail, public transportation, recreation facilities, and schools.
3. Housing design and construction is energy efficient and minimizes adverse environmental impacts.

Housing policy, planning, and regulation plays a major role in shaping the physical form, landscape, and demographics of the region. The policies set by regional and local plans result in regulations and other actions that impact the location, density, type, form, and amount of housing. These factors in turn inform the efficiency of utilities and services, the economic vitality of our region and its villages and downtowns, workforce availability, agricultural viability and forest fragmentation, and the overall character of our communities. Ultimately, regional planning decisions impact the housing options available to individuals and families, including accessibility to employment, health care, education, and grocery stores; affordability; and size.

FIGURE 1:
Rate of Growth in Number of Households



SOURCE: Decennial Census, U.S. Census Bureau

Beyond physical implications, housing is a basic human need and foundational building block for individuals and families to be successful in life. It is well understood that once stable housing is achieved, individuals and families are more likely to sustain employment and achieve other life goals. While housing people is complicated by a wide range of social and economic policies and conditions, this region is committed to ensuring equitable access to safe, convenient, and affordable housing for current and future generations.

The region as a whole does not have enough affordable housing, driven in part by an overall housing shortage in the State of Vermont. The supply of housing has not kept pace with population growth, and more units are needed for a given population due to the growing number of smaller households. The shortage is complicated by an older, homogeneous housing stock, high construction costs, the pandemic, and other economic factors. The impacts of the housing crisis have rippled through every community; local and regional planners and officials throughout the state are faced with the immense challenge of taking action to better meet the housing needs of families and individuals.

NRPC completed a housing needs assessment in 2022 to provide an understanding of demographic and housing trends in the region and to quantify regional housing needs. ([Northwest Vermont Housing Needs Assessment, Place Sense LLC, January 2023](#)) The State of Vermont completed a Statewide Housing Needs Assessment for 2025 to 2029 and subsequently, the regional planning commissions worked with the State to prepare regional housing targets based on the needs assessment. This chapter includes important highlights and conclusions from the 2022 housing needs~~these~~ assessments.

Current Housing Landscape and Trends

Household Count and Growth

23,088 households were living in the two-county region in 2020, an increase of 1,673 households from 2010. Household change has been increasing at slower rates since the 1970s, although Grand Isle County bucked this trend in the 2010s, growing faster than the previous decade. Overall, the region has been experiencing slow household growth—averaging 0.9% annually between 2000 and 2020. This growth is faster than the state, but slower than Chittenden County and Lamoille County.

Housing creation has largely been occurring in only a few communities in recent years. During the past 20 years, 45% of households moving into or forming in the region were in St. Albans Town and Fairfax. Only St. Albans City experienced a decline in the number of households between 2000 and 2020, although City permit data show a smaller decline of only 22 units.

Migration

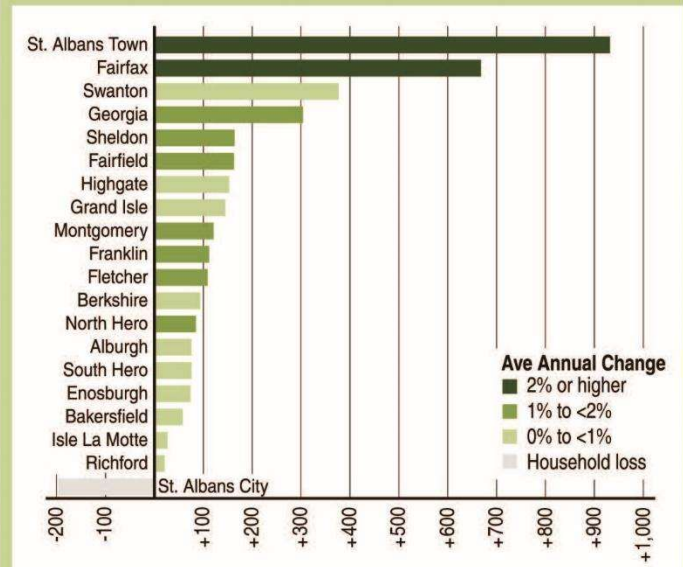
Households that moved between 2000 and 2020 were largely going from one residence to another within the region, rather than migrating in from outside the region. Approximately 15% of residents who moved between 2015 and 2020 moved into the region from outside Vermont, while nearly 27% moved into the region from somewhere else in Vermont. In the coming decades, migration into Vermont by “climate refugees” is projected to increase. Some climate-related migration into Vermont is likely already happening and will continue to happen largely by households at higher median incomes with the flexibility to move to more desirable locations. As the climate continues to change, climate migration will likely become an unavoidable choice regardless of income in some parts of the country. This region should prepare to receive new climate refugees, since it is projected to be one of most habitable locations in the country as the climate warms (ProPublica, Climate Migration, 2020).

The COVID 19 pandemic may have influenced new migration into the region in 2020 and 2021 by households with the flexibility to work from home and the financial means to relocate to areas that appeal to their lifestyle. These trends are so far only confirmed anecdotally; it is necessary to review the results of the pending 2021 American Community Survey data to confirm accuracy and also to explore the proportion of out-of-state migrants who already owned property in the state and changed it to their primary residence versus remote workers who decided to move to Vermont.

Travel to Work

While Franklin County is host to several regional job centers in St. Albans, Enosburgh, Swanton, and Georgia, it is also within commuting distance of Chittenden County’s large regional employment center. As a result, just under half (48%) of the workforce stays within the county for employment. For the other half of the workforce that travels to Chittenden County for work, it is usually a tradeoff for more affordable housing options in Franklin County. In Grand Isle County, over 80% of the workforce travels off the islands due to limited employment options there and easy access to Chittenden County. (U.S. Census Bureau, LEHD Origin-Destination Employment Statistics (2019))

FIGURE 2:
Change in Number of Households
2000 - 2020



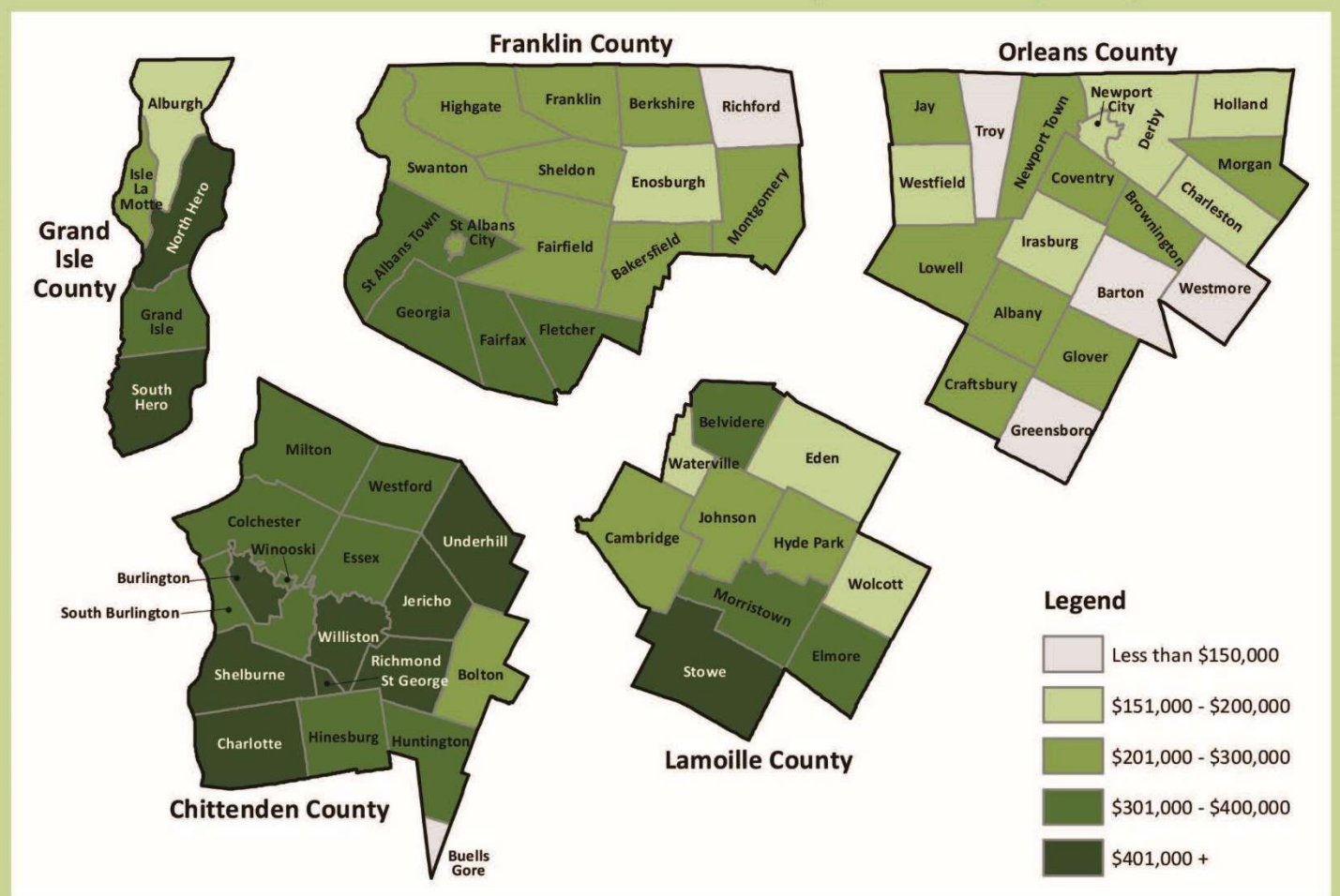
SOURCE: Decennial Census, U.S. Census Bureau

Sale Prices

The median sale price of a single-unit primary home in the two-county region increased to new highs in 2021: \$275,000 in Franklin County and \$330,050 in Grand Isle County.

Home sale prices are strongly influenced by the market in Chittenden County, with those towns adjacent to or within easy commuting distance of Chittenden County having higher sale prices. In Franklin County, prices rose significantly at the beginning of the century but declined from 2006 to 2016. There was a sharp increase in 2019 to nearly \$242,000, and price increases were sustained in 2020 and 2021. Grand Isle County experiences a high variability in median price from year to year due to the small number of sales, but the overall trend is similar to Franklin County at a higher price point. Overall, from 2018-2023 home prices in Vermont rose at more than three times the rate of inflation (Bureau of Labor Statistics).

MAP 4: Median Sale Prices of Primary Residences (2021)



SOURCE: Housing Vermont - www.housingdata.org

Housing Types

The diversity of the housing stock declined between 2000 and 2020, with the region losing housing in two-, three-, and four-unit structures, along with mobile homes, which is a trend that is seen statewide. Single-unit detached homes comprised nearly 77% of the two-county region's housing stock in 2020.

On the other hand, the region has experienced an increase in units in large multi-unit buildings between 2000 and 2020. Affordable rental housing projects built in the region during this 20-year period created 325 units in buildings with 10 or more units, accounting for two-thirds of new units in buildings of that size. The remaining

third is mostly accounted for by market-rate senior housing. New multi-unit housing was highly concentrated in a small number of communities: 52% in St. Albans Town and another 20% in Fairfax. Additional large-scale developments, such as the Cathedral Square senior housing facility in South Hero, have been constructed since 2020.

Seasonal and Second Home Properties

The two-county region is a recreation destination and has historically had a substantial stock of camps and second homes. Census data suggests that nearly 13% of the region's housing units were seasonal in 2020. Seasonal housing is concentrated in Grand Isle County, where it accounted for nearly 35% of all units in 2020. Seasonal housing comprised more than 25% of the housing stock in six of the region's municipalities in 2020: Franklin, Montgomery, Alburgh, Isle La Motte, North Hero, and South Hero. Short-term rentals also make up a portion of seasonal dwellings, but the percentage varies by community and season.

Projections

The two-county projection indicates that the regional population will continue to grow through 2040, but the pace of growth between 2020 and 2040 will be slower than between 2000 and 2020. It projects an increase of about 2,600 new residents in the region over the 20-year period—an average annual growth rate of 0.2% between 2020 and 2040. Future housing demand will be driven by the number and characteristics of households. It projects an increase of 1,630 new households in the region over the 20-year period—an average annual growth rate of 0.4% between 2020 and 2040. The projection indicates that the number of households in the two-county region headed by someone age 65 or older will increase by about 1,560, suggesting an aging in place of the region's boomer households and the need for long-term care facilities. It also shows a recovery in the number of households headed by someone age 35 to 44, which had declined significantly between 2000 and 2020, suggesting new millennial households moving into or forming in the region.

Household Characteristics

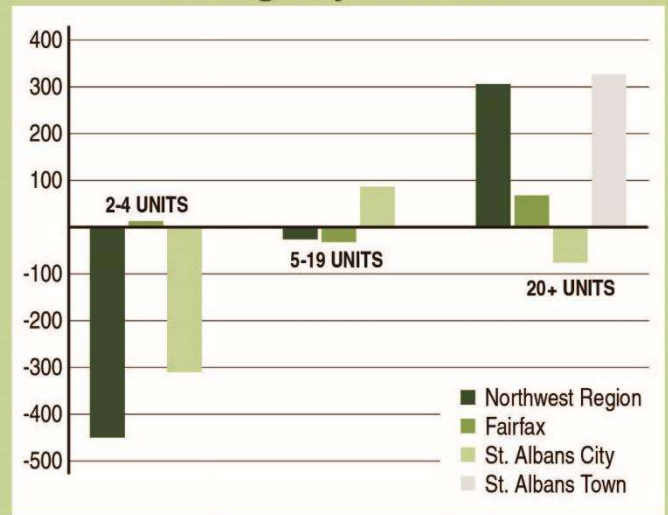
Age

The median age was estimated to be 40.5 years in Franklin County and 48.7 years in Grand Isle County in 2020. All municipalities in the region saw the median age of residents increase between 2000 and 2020. A person's age is highly predictive of their housing needs, preferences, and experience. Baby boomers have reached or will soon reach retirement age, with many planning to "age in place." The large generation of millennials have been facing issues of affordability and uncertainty since they entered the housing market.

Household Size

Household size in the two-county region continues to decline, with the average falling below 2.5 people in 2020. Average household size ranged within the region from a low of 2.13 people in Isle La Motte to a high of 2.71 in Georgia. In both counties, the average household size was approximately 3 persons in 1980. As household size drops, more housing units are needed to house the same population.

FIGURE 3: Multi-Unit Housing Change by Location



SOURCE: American Community Survey

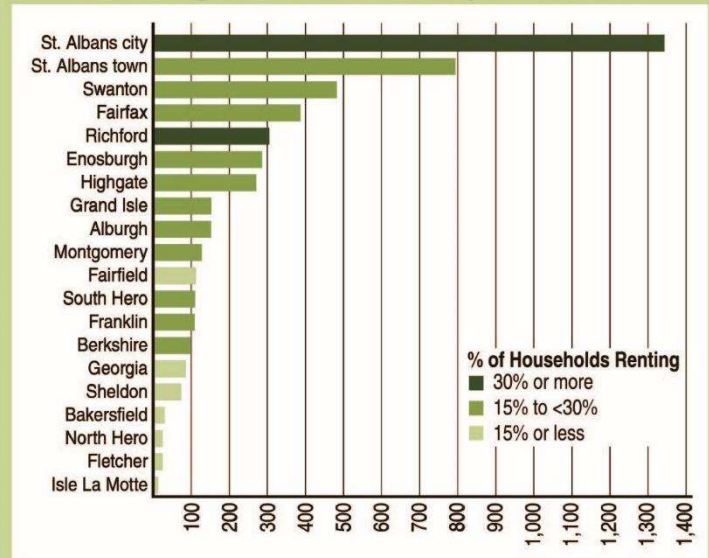
Living Arrangements

Approximately 64% of the region's households are estimated to be families (defined as two or more people related by blood, marriage, or adoption and residing together) (ACS, 2020). While the two-county region continues to have more family than nonfamily households, we are seeing growth in nonfamily and single-person households. Between 2000 and 2020, 82% of new households created were nonfamily and 60% were single-person households. More than 2,100 new single-person households were created over the 20-year period. New family and nonfamily households account for net population growth in addition to the dynamic shifting of the same population between family and nonfamily living arrangements.

Tenure

Nearly 80% of households living in the two-county region in 2020 owned their home. More than 90% of new households created between 2000 and 2020 in the region were homeowners. Households who rent are concentrated in St. Albans City and St. Albans Town, which together account for more than 43% of all the renting households in the region. Households headed by the youngest and oldest residents in the region are the most likely to be renting. Single-person households in the region are also more likely to be renting.

FIGURE 4:
Renting Households by Location



SOURCE: American Community Survey, U.S. Census Bureau

Household Income, Housing Cost and Affordability

Housing affordability is primarily determined by two factors: household income and housing costs, although other costs of living including transportation impact overall affordability. The Census Bureau estimated that median household income in Franklin County was \$65,314 and in Grand Isle County was \$81,667 in 2020. The Metropolitan Statistical Area Median (MSA) income, which includes the region and Chittenden County, is \$73,447. Median household income in Franklin County increased 4.5% above the rate of inflation between 2000 and 2020. The data shows much larger gains in Grand Isle County with a jump of 26.5% over the 20-year period.

Housing and Transportation Costs

Housing is generally considered affordable regardless of income when a household uses **no more than 30%** of their income to pay for it.

Given that travel to and from a household to destinations varies based on location **transportation costs** are considered affordable when they consume **15% or less** of the household income.

Combined housing and transportation costs that total **greater than 45%** of the household income are considered unaffordable.

Household income growth is not evenly distributed across households of different types and characteristics. Family households saw their median income grow significantly more than non-family households. In 2020, the median income of owning households was approximately twice the median income of renting households in the two-county region. Households headed by someone identifying as non-white or white and another race/ethnicity, younger or older were disproportionately represented in the region's lower income groups.

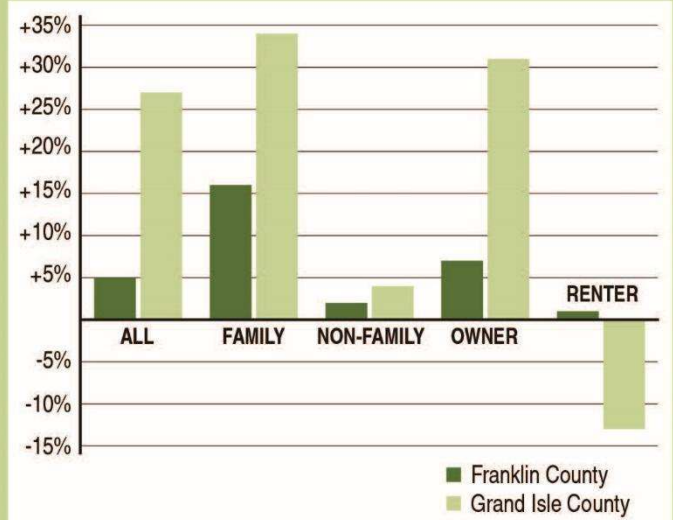
The Census Bureau estimated that 10% of the region's households had an income below the poverty line in 2020. Despite gains in medium income, both the total number of households below the poverty line and the poverty rate inched upwards between 2000 and 2020. The increase in households below the poverty line is entirely attributable to nonfamily households. A nonfamily household in the two-county region is nearly three times as likely to have an income below the poverty line as a family household. Given that most of the region's new households are nonfamily households, the income and poverty disparity between family and nonfamily households is a worrying trend.

Households are considered to be cost-burdened by their housing costs when monthly housing costs consume more than 30% of their income for rent, mortgage, insurance, taxes and utilities. This metric is widely accepted as the maximum level considered affordable for the average household. For the Northwest Region, homeownership is affordable when ownership costs do not exceed 30% of gross annual income using a target income of 120% of the Burlington-South Burlington MSA median household income. And, rental housing is affordable when total rental costs do not exceed 30% of the gross annual income using a target income of 80% of the Burlington-South Burlington MSA median household income.

The Census Bureau estimated that nearly 1 in 3 households in the two-county region were cost burdened in 2020. The number of cost burdened households decreased from 2010 to 2020, however this decrease was almost entirely made up of owning households. The steep rise in home sale prices has been cushioned by increases in median income for homeowners. Whether with a mortgage or without a mortgage, ownership costs remained well below the affordability limit of 30% of household income for the region's median household income. However, the region's renting households are significantly more cost burdened. Renting a home remains unaffordable for 43% of renting households at the region's median household income.

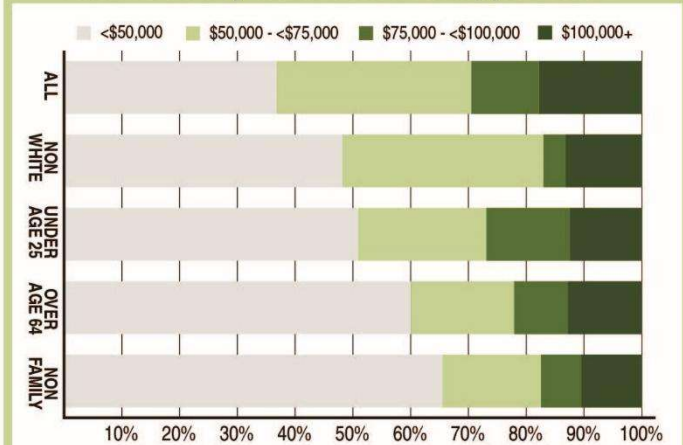
Housing cost burden is also impacted by transportation costs. Transportation costs are considered affordable if they are 15% or less of a household's income. Transportation costs are impacted by proximity to jobs and services as well as the availability of public transit. According to a national index developed by Neighborhood Technologies, regional residents spend, on average, roughly 22% of their income on transportation costs, with at least 60% of regional residents being considered transportation cost-burdened. Map 3 in the Introduction shows combined housing and transportation costs for the region.

**FIGURE 5:
Median Income Growth
2000 - 2020**



SOURCE: U.S. Census Bureau

**FIGURE 6:
Income by Household Type 2020**



SOURCE: American Community Survey, U.S. Census Bureau

Many of the region's most vulnerable households are disproportionately burdened by housing costs. 6,620 or 64% of low-income households (with annual household income 80% of MSA or less) in the two-county region were cost burdened. Many of these households are single people – younger adults and seniors. Younger adults in this group are more likely to be renting, while older adults are more likely to be homeowners. These households are also more likely to be headed by someone with a disability or someone identifying as BIPOC or multi-racial. Households with children represent a smaller proportion of low-income households, but those with children are nearly all cost burdened.

FIGURE 7: Cost Burdened Households



NOTES: Cost burdened households are spending more than 30% of their income on housing. The percentage of cost burdened households in each category is shown in yellow in the pie charts. The pie charts are sized to represent the total estimated number of households in each category based on data from the U.S. Census Bureau, 2020 ACS PUMS.

Non White means that the head of the household responded to the US Census question on race and ethnicity by identifying as Native American, Black, Hispanic, another race or ethnicity other than White, or White in addition to another race and/or ethnicity, i.e mixed race and/or ethnicity.

Closing the Gap Housing Targets: Meeting Current and Future Housing Needs

Vermont Statute (24 V.S.A. § 4348a(a)(9)) tasks Regional Planning Commissions with identifying the housing needs for all communities and economic groups in the region, and estimating the need in terms of price, quality, unit size or type, and zoning district as applicable, and disaggregating regional housing targets or ranges by municipality. The 2022 Northwest Vermont Housing Needs Assessment ~~has~~ determined that a significant number of households in the region do not have adequate ~~housing, or housing or~~ have unmet housing needs. Unmet Housing needs are categorized by those households that are currently unhoused,

underhoused and/or cost-burdened; this analysis did not take into account new housing units needed to account for population growth. Overall, factoring in overlap between the underhoused and cost-burdened, the assessment estimates that 7,600 households are currently living with an unmet need with just shy of 50% of households (3,680) with an unmet need entirely due to cost-burden and 3,920 households with an unmet need based on a combination of other factors. (See Figure 8).

The unhoused population consists of those individuals and families that are currently experiencing homelessness. The

underhoused population includes individuals and families that do not have their needs met by their current housing, including young adults living with family members because adequate housing is not available, housing that is overcrowded or poor quality, and senior housing that is not ADA compliant. The cost-burdened population are individuals and families that pay more than 30% of their household income on housing costs. The level of current unmet housing need is so significant that 'catching up' will require a sustained, long-term commitment. Meeting the

housing needs of current households will take a combination of new affordable housing units, modifications to existing units and expansion of programs that address both housing costs and household income. To satisfy the current unmet need within a 20-year timeframe, it would necessitate addressing the unmet needs of an average of 380 households annually. This does not take into account new housing units needed to account for population growth.

The 2025 Vermont Housing Needs Assessment includes targets for new housing in each region that factor factors in projected household growth and certain some aspects of unmet housing need -(normalizing vacancy rates and housing the unhoused unhoused, but not cost burden). The targets contain lower and upper scenarios for 2030 and 2050. The assessment projects that the Northwest Region will need to add 2,144-3,249 units of housing by 2030 -and 6,755-13,315 units by 2050 in order to achieve statewide housing goals.

Municipal Housing Targets

In accordance with statute, NRPC has broken the regional targets down into municipal targets (Table 2). These targets are based on: 1) The current number of housing units in each municipality, and 2) Whether the municipality has a Planned Growth Area. Planned Growth Areas are allocated 60% of the 2050 housing target in order to accommodate a substantial majority of growth. 2030 targets are normalized adjusted to reflect with respect to the towns' current growth rates to account for existing short-term barriers to housing growth.

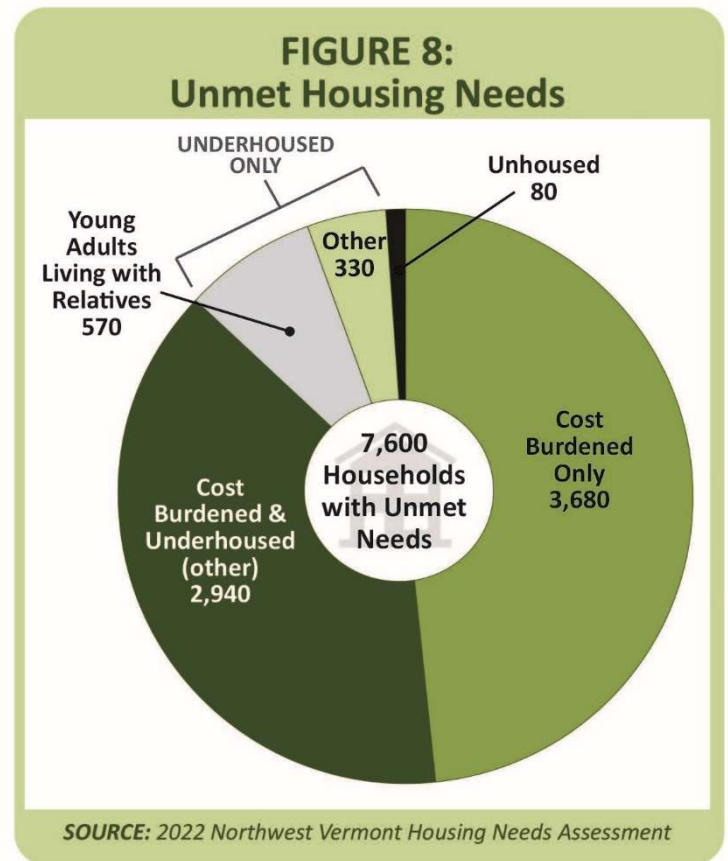


TABLE 2: Municipal Housing Targets

Municipality	Average % yearly housing	Average % yearly housing	2025-2030 Target	2025-2050 Target
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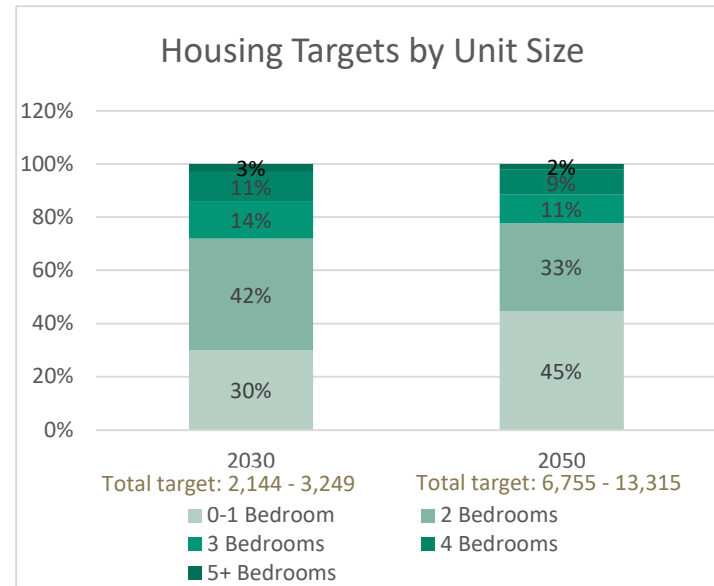
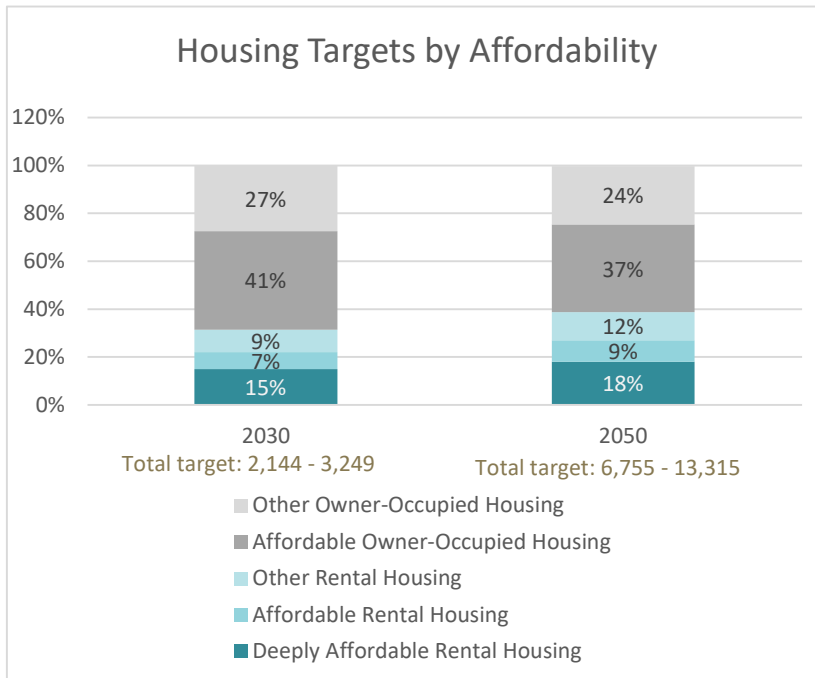
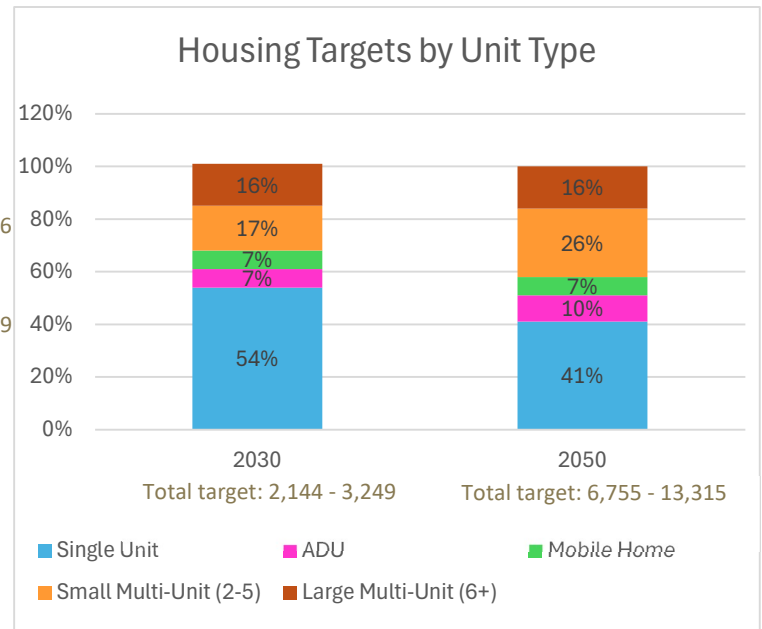
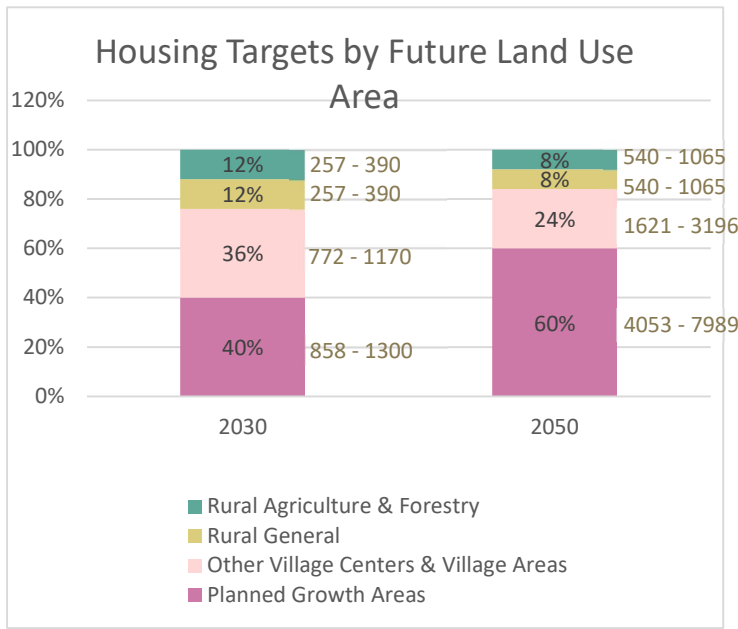
	growth, 2000-2020	growth, 2020-2024	<i>Units</i>	<i>% / year</i>	<i>Units</i>	<i>% / year</i>
Alburgh	1.2%	0.4%	73 - 111	0.9 - 1.4%	222 - 455	0.6 - 1.2%
Bakersfield	0.7%	0.4%	28 - 43	1 - 1.5%	82 - 168	0.6 - 1.2%
Berkshire	0.8%	0.8%	46 - 69	1.4 - 2.2%	95 - 185	0.6 - 1.2%
Enosburgh	0.4%	0.4%	93 - 140	1.5 - 2.3%	409 - 767	1.2 - 2.5%
Fairfax	2.8%	1.3%	251 - 381	2.6 - 3.9%	615 - 1204	1.2 - 2.5%
Fairfield	1.0%	0.7%	58 - 88	1.3 - 1.9%	131 - 266	0.6 - 1.2%
Fletcher	0.9%	0.4%	29 - 44	1 - 1.4%	86 - 176	0.6 - 1.2%
Franklin	0.6%	1.0%	66 - 100	1.6 - 2.4%	129 - 238	0.6 - 1.2%
Georgia	0.9%	0.7%	125 - 190	1.3 - 1.9%	287 - 570	0.6 - 1.2%
Grand Isle	0.9%	0.7%	77 - 117	1.3 - 1.9%	172 - 359	0.6 - 1.2%
Highgate	0.8%	0.9%	123 - 186	1.5 - 2.3%	236 - 465	0.6 - 1.2%
Isle La Motte	0.3%	0.3%	20 - 31	0.8 - 1.3%	72 - 143	0.6 - 1.2%
Montgomery	0.8%	0.4%	37 - 56	1 - 1.5%	118 - 224	0.6 - 1.2%
North Hero	0.2%	0.6%	53 - 80	1.1 - 1.7%	159 - 276	0.6 - 1.2%
Richford	0.3%	0.2%	68 - 103	1.3 - 1.9%	362 - 666	1.2 - 2.5%
Sheldon	1.5%	0.6%	52 - 78	1.2 - 1.8%	135 - 259	0.6 - 1.2%
South Hero	0.2%	1.1%	96 - 145	1.8 - 2.7%	149 - 311	0.6 - 1.2%
St. Albans City	-0.2%	0.4%	116 - 175	0.7 - 1.1%	729 - 1440	0.9 - 1.8%
St. Albans Town	2.2%	0.7%	261 - 397	1.6 - 2.4%	1650 - 3257	2.0 - 4.0%
Swanton	0.7%	0.6%	263 - 398	1.7 - 2.6%	937 - 1894	1.2 - 2.5%
Total	0.8%	0.7%	2144 - 3249	1.5 - 2.3%	6755 - 13315	1.0 - 1.9%

Housing Targets by Price, Size, Type and Land Use Area

As discussed earlier in this chapter, there is currently a mismatch between the demographics of the region and the kinds of housing that are currently available. Data shows trends of smaller households with increased affordability challenges and a need for a greater variety of unit types in proximity to services and employment. To reflect these needs, NRPC has broken the regional target down by certain housing characteristics. These targets outline the location, affordability and diversity of housing types necessary to meet regional housing needs and land use goals. These calculations are informed by the current development trends, projected household growth, and regional goals and policies on housing and land use.

Total target: 2,144 - 3,249

Total target: 6,755 - 13,315



Strategies to Address Housing Needs

NRPC recommends the following strategies to address unmet housing needs and achieve housing targets:

1. new housing units in 2–5-unit buildings primarily in Centers, Planned Growth Areas and Village Areas regional and sub-regional growth areas and village centers,
2. flexibility and incentives for construction of Accessory Dwelling units
3. improvements to sub-standard housing units,
4. enrollment of existing units in guaranteed affordability programs,
5. new/expanded housing assistance programs that result in lower housing costs, and

6. new/expanded workforce development/job training programs that result in higher household income, and-
- 6-7. investment in water and sewer infrastructure in Centers, Planned Growth Areas and Village Areas to support greater densities of housing.

To address disproportional impacts on different types of households, strategies will need to focus on meeting the needs of:

1. severely cost-burdened households,
2. households currently living in substandard housing,
3. BIPOC households,
4. seniors facing difficulties with aging in place, and
5. young adults seeking to move into or form a household within the region.

NRPC will work with municipalities and other regional and statewide partners on implementing housing strategies with the intention of addressing unmet housing needs and promoting the development of new units. Attention will focus on better meeting the needs of all communities across the region and the marginalized populations that have historically faced discrimination and disproportional impacts on housing security. While NRPC is not directly involved in constructing new housing units, the Commission will continue to work with communities on making it easier to build homes by reducing regulatory barriers and providing incentives for new housing development locally. The Commission also coordinates with partners to further a wide variety of programming that supports homeowners and renters in managing the cost of housing, access to housing and sustaining and improving existing homes.

NRPC will continue to serve as the backbone organization for the Housing For All, Working Communities Challenge Regional Collaborative. This partnership, is initially funded through the state of Vermont and the Federal Reserve Bank of Boston, and has a mission to support the creation and improvement of housing for healthy, inclusive, and prosperous communities.

This effort will also include education on regional housing needs, maintaining and updating data and tracking progress and outcomes. - To track progress toward regional housing goals, NRPC collects building permit information on a yearly basis from all municipalities with zoning. This data is published as a Regional Housing Dashboard that shows the type and location of new housing built since 2020. The dashboard is available on the NRPC website. Unfortunately, the data needed to adequately track progress towards this goal is not easily collected or adequately tied to improvements in meeting housing needs, so part of this effort involves working to improve access to data.

GOALS AND POLICIES

1. **Build and improve more homes so that high-quality, safe and affordable housing options are equitably available to all current and future residents consistent with housing targets.**
 - a. Promote the construction of new housing units through local and state permitting flexibility, bylaw modernization, employer assisted housing and education about the importance of housing.
 - b. Preserve the region's existing housing stock; improve substandard housing to comply with state recognized building codes.
 - c. Promote mixed-income Affordable Housing Developments with at least 20% or a minimum of 5 affordable units as defined by VT Statute for new housing developments in the region.
 - d. Support perpetual affordability protected by covenant or other legal restriction for new affordable

housing developments.

- e. Support a variety of programs that provide financial incentives for affordable housing, such as land trusts, cooperative housing, shared equity, Section 8 vouchers, alternative financing and others.
- f. Promote zoning changes that integrate diverse housing types into existing neighborhoods, including accessory apartments, cottage courts and 2-5 multi-unit housing for residents of all incomes and ages.
- g. Support the development of housing that meets the needs of the existing and future workforce of the region and assist employers who are interested in participating in employer supported housing.
- h. Promote and facilitate life safety and accessibility improvements in housing units.
- i. Support the development of housing units dedicated to those that are housing insecure or unhoused.
- j. Target housing access programs to populations that have experienced housing insecurity at disproportionate rates, including BIPOC and mixed-race households.
- k. Promote and facilitate housing dedicated to the region's senior residents.
- l. Improve the financial security of low- and moderate-income households.
- m. Ensure compliance with fair housing laws.

2. Ensure housing is easier to build in centers, village areas and planned growth areas~~concentrated, regional and sub-regional growth areas and village centers~~ that are convenient and accessible to employment, services, retail, public transportation, recreation facilities and schools.

- a. Promote the efficient design of new housing developments to conserve energy and minimize the financial impact of expanded municipal services on municipalities and taxpayers, including maximizing density according to local context, utilizing a street network that connects to services and amenities and making use of public or shared wastewater, water supply and stormwater infrastructure.
- b. Support the location of housing developments that have substantial regional impacts within ~~locally and regionally designated growth centers~~centers, village areas and planned growth areas with appropriate infrastructure, and outside of identified resource and conservation lands.
- c. Ensure that multi-family, assisted living and group homes will be designed to meet the needs of the occupants and will be located in areas with convenient access to related services.

3. Housing design and construction is energy efficient and minimizes adverse environmental impacts.

- a. Support development of water and wastewater infrastructure in and around the region's growth areas to support additional high-density housing development in smart-growth locations.
- b. Encourage the design of housing developments that fit into the cultural, aesthetic and natural landscape in which they are located.
- c. Ensure new rural housing developments are sited to preserve the greatest amount of open space possible, avoid adverse impacts on significant natural areas and minimize the fragmentation and parcelization of agricultural land and habitat blocks. Open space shall be retained for agriculture, forestry, recreation or resource preservation.

- d. Support the conversion of existing commercial and institutional space to new housing to meet the region's needs.