



October 7, 2025

Chair Richard Haggerty  
Joint Committee on Housing  
Attention: Luke O'Roark  
24 Beacon St. Room 146  
Boston, MA 02133

Re: H.2298, An Act facilitating site plan review

Dear Chair Haggerty,

On behalf of the Northern Middlesex Council of Governments (NMCOG), one of the 13 regional planning agencies in Massachusetts, I am writing to express our support for H.2298, An Act facilitating site plan review.

As the regional planning agency serving the nine communities of Billerica, Chelmsford, Dracut, Dunstable, Lowell, Pepperell, Tewksbury, Tyngsborough, and Westford, NMCOG works closely with local officials, planning boards, developers, and residents on zoning, housing, and development matters. A consistent challenge across many municipalities can be the lack of clarity and predictability in local site plan review processes, which results in delays, uncertainty, and additional costs for both municipalities and applicants.

Our recent experiences providing technical assistance to the towns of Billerica and Westford highlight these challenges. In both communities, NMCOG provided technical assistance as local boards worked to consider updates to their site plan review bylaws. Drafting and revising these bylaws required significant time and effort to balance local priorities with legal defensibility, to establish objective performance standards, to provide clear procedures for applicants, and to update Planning Board rules and regulations related to the amended zoning regulations. In Westford, NMCOG helped update a bylaw that already introduced a site plan review process based on the size and scale of a project, so called "tiered" site plan review, to establish a three-tiered system with administrative, minor, and major site plan review processes. This tiered system is one excellent model of how municipalities can provide administrative reviews for by-right development without introducing public hearings and added process which may impact project timelines and extend the duration of local permitting. Without statewide guidance in MGL Chapter 40A, municipalities must start largely from their local experiences with permitting and reviewing development and also develop definitions, standards, timelines, and procedures in ways that may vary widely. This creates uncertainty not only for municipal officials

responsible for drafting and applying the rules, but also for applicants and community members trying to understand and participate in the process.

If the framework proposed in H.2298 had been in place, Westford and Billerica would have been able to rely on clear statutory direction for defining site plan review, establishing objective performance standards, and setting timelines for decision-making. This would have reduced the burden on local boards and staff, streamlined the update process, and improved transparency and predictability for applicants. Most importantly, it would have helped build greater public trust by ensuring that site plan review is conducted fairly, consistently, and with clear statutory authority in communities across the state.

H.2298 provides an important framework for standardizing site plan review across the Commonwealth while maintaining appropriate local control. By clearly defining “site plan review” and “performance standards” in Chapter 40A, the legislation will ensure transparency, efficiency, and fairness in the review process. Establishing predictable timelines and objective standards will help municipalities better manage growth while also giving applicants a clearer understanding of requirements at the outset.

For the NMCOG region, this legislation will provide consistency across our nine member communities, making it easier for them to coordinate with each other and for developers to navigate the process when working on projects in multiple towns. It will also enhance public trust in local decision-making by ensuring site plan review is objective, transparent, and accessible.

We believe this bill will complement broader housing production and smart growth initiatives by enabling municipalities to focus on thoughtful planning while providing a predictable, fair process for applicants.

Thank you for your leadership and for considering this important legislation. Please do not hesitate to contact me at [jraitt@nmcog.org](mailto:jraitt@nmcog.org) should you have any questions or require additional information.

Sincerely,



Jennifer M. Raitt

Executive Director

Northern Middlesex Council of Governments