



AVON
CONNECTICUT

TOWN OF AVON AFFORDABLE HOUSING PLAN 2022-2027



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Executive Summary

Connecticut has become a very expensive place to live. Over decades, the costs of land, housing development, home purchases, and rent have risen faster than incomes. At the same time, communities all across the State have struggled to develop new housing options for key groups like senior citizens, young families, and new residents. These conditions, along with other factors, have limited the growth of the state's population and economy. There is a growing focus on the need to address housing at local, regional, and state levels.

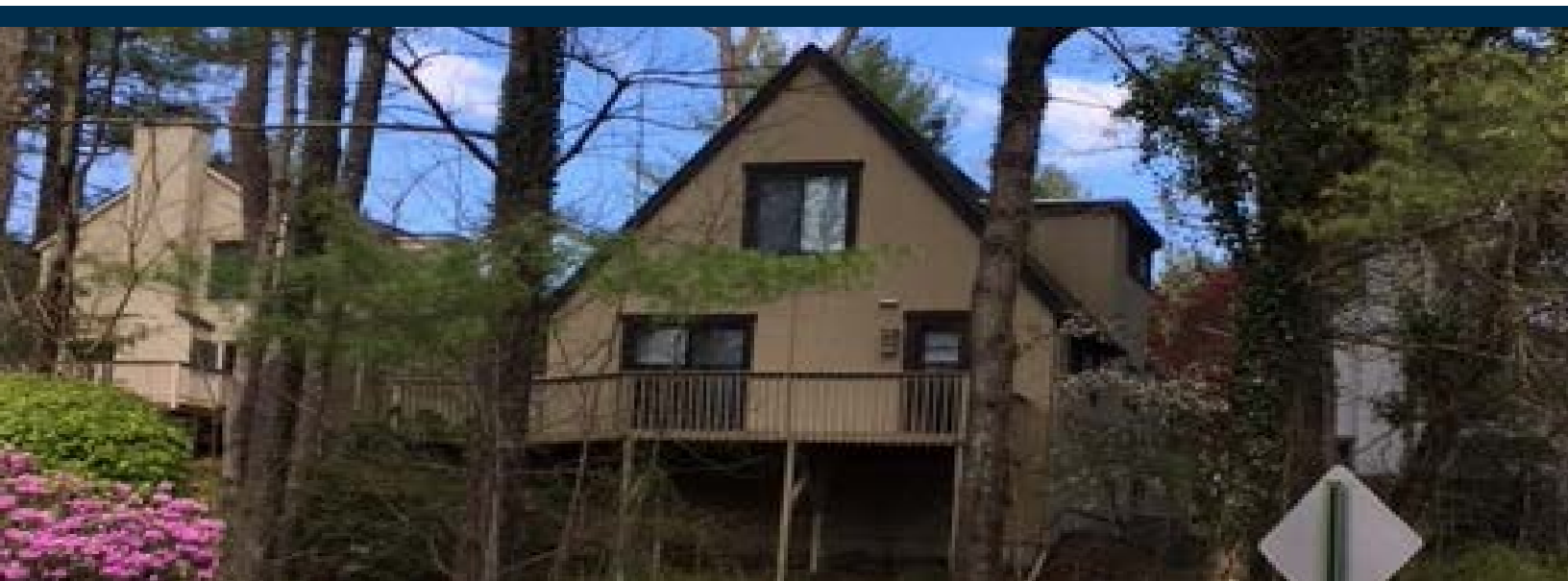
In 2017 the Connecticut General Assembly adopted Public Act 17-170, codified at CGS Section 8-30j, requiring every municipality to prepare a plan to be updated every five years that indicates how the community intends to "increase the number of affordable housing developments in the municipality." In accordance with the state requirement, and in furtherance of the goals of the Town of Avon 2016 Plan of Conservation and Development (POCD), the Avon Planning & Zoning Commission (the Commission) has developed the 2022 Affordable Housing Plan (the 2022 Plan).

Affordable housing is generally defined as housing that is available to households making less than the area median income and costing less than 30% of a household's annual income. This can include both naturally-occurring (market-rate) apartment units or specifically restricted properties that have been income-limited by deed.

Over the next five years, the Commission recommends that the Town of Avon (the Town or Avon) adopt the following measures to increase the number of affordable housing units in the community:

Review existing housing stock to increase the number of affordable units through deed restrictions, income limits, use of Connecticut Housing Finance Authority or other government assistance home financing programs.

1. Support review and approval of accessory dwelling units
2. Review the concept of Transfer Development Rights (TDR) and determine whether revisions to the Town's existing TDR regulation can help the dual goals of housing density and open space protection
3. Review the housing needs of Avon's aging population and target development opportunities
4. Continue promoting use of the existing Attainable Housing Overlay Zone (AHOZ)
5. Promote public awareness of Avon's housing efforts



SECTION 1: Is an Affordable Housing Plan Required?

Connecticut law requires towns to adopt or amend its Affordable Housing Plan (“AHP” or the “Plan”). In July 2017, new legislation, PA 17-170 (now codified as Section 8-30j of the Connecticut General Statutes) was passed in Connecticut requiring that every five years all Towns adopt or amend an Affordable Housing Plan. The Act stated that “such plan shall specify how the Municipality intends to increase the number of affordable housing developments in the Municipality”. In 2016, the Commission approved its POCD including the Town’s 10-year affordable housing goals. Connecticut law now requires each municipality to prepare or amend a plan every five years.

In addition, CT General Statute 8-2 requires that Towns adopt regulations that “promote housing choice and economic diversity, including housing for both low- and moderate-income households” as well as encouraging the development of housing that will meet the needs of the residents of each community.

The 2022 Plan is intended to 1) report the status of housing opportunities in the Town and 2) identify the current and expected housing needs of Avon residents in the near future; and 3) identify opportunities for making housing more suitable and attainable in the Town, in addition to increasing the supply of “Affordable Housing” as defined under CT law (see section below on the definition of “Affordable Housing”). The Town endeavors to encourage people to establish residency in Avon and ensure that existing housing stock can accommodate the changing and future needs of the Town’s current and future residents.

For most residents in Avon, similar to other towns, housing costs are the largest financial burden. Nearly a quarter (24%) of homeowners and two thirds (63%) of renters in Avon spend thirty percent (30%) or more of their income on housing, per data from the Partnership For Strong Communities (<https://housingprofiles.psychousing.org/>).

Housing experts recognize that when community members spend too much on housing costs, they do not have the financial resources for childcare, groceries and medical expenses or other non-essential goods and services. These factors also adversely impact the local and regional economy. Supporting opportunities to access affordable and quality housing benefits the Town and its residents.



SECTION 2: What is Affordable Housing?

Rising housing costs, and the fact that due to those costs some cities and towns in our state were becoming harder and harder to live in first came to light in the 1980s. In response to the high cost of housing, Connecticut created the affordable housing appeals procedure known today as Section 8-30g. The term "Affordable Housing," with a capitalized "A," refers to a type of housing that meets specific criteria outlined by this State law.

In Connecticut, an Affordable Housing unit is defined as a dwelling that:

- 1) costs less than thirty percent of the income of a household earning eighty percent of the Area's Median Income; and
- 2) has been deed restricted to ensure that the housing unit will remain Affordable for a period of forty years; or
- 3) ownership units that are currently financed by the Connecticut Housing Finance Authority (CHFA) or the U.S. Department of Agriculture (USDA).

According to the Department of Housing and Urban Development's 2021 income data, the Area Median Income for a household of four in Western Hartford County was \$104,300. The 2018 American Community Survey listed Avon's median household income at just over \$125,500. Connecticut law applies the lesser of the median income value to the Affordability analysis.

Example A: 2 Bedroom Unit for a Family of Four	Total/Year	Monthly housing expenses not to exceed
Area Median Income (AMI)	\$104,300	\$8,692
Median income level per household in the surrounding/market area		
80% of AMI	\$83,440	\$6,953
80% of the median income listed above		
30% of 80% of AMI	\$25,032	\$2,086
Maximum non-burdened budget for housing		
120% of HUD Fair Market Rate*	\$20,040	\$1,670
HUD 2020 Fair Market Rates, 2BR - Hartford County (Rent/Mortgage + Utilities): \$1,670		

Example B: 1 Bedroom Unit for a 2-person household	Total/Year	Monthly housing expenses not to exceed
Area Median Income (AMI)	\$83,500	\$6,958
Median income level per household in the surrounding/market area		
80% of AMI	\$63,950	\$5,329
80% of the median income listed above		
30% of 80% of AMI	\$19,185	\$1,599
Maximum non-burdened budget for housing		
120% of HUD Fair Market Rate*	\$15,264	\$1,272
HUD 2020 Fair Market Rates, 1BR - Hartford County (Rent/Mortgage + Utilities): \$1,272		

*HUD allows local offices to authorize payments for rent support up to 120% of fair market rate.

In specific cases, income limits are determined by both the affordability category (Low Income – 80% AMI vs. Very Low Income – 50% AMI) and the number of persons in the family. A larger household size may have a higher gross income but still be considered low income for housing purposes. A sample HUD income table including larger household sizes is below.

Connecticut 8-30(g) Rule

Per Section 8-30g of the Connecticut General Statutes, municipalities with less than 10% of Affordable housing stock must allow construction of Affordable or mixed-income housing proposals unless they can prove, if challenged in court, that the rejection is necessary to protect substantial

public interests in health or safety. Such developments must restrict at least 30% of the units as Affordable to low- and moderate- income households for at least 40 years. Thirty-one towns and cities across Connecticut are exempt from 8-30g, including all of the state’s larger cities as well as communities such as Bloomfield, Bristol, Danbury, Meriden, New Britain, and Torrington. Case law has almost exclusively supported developers’ appeals and decided in favor of the developers. The courts have generally found that the need for Affordable housing outweighs other matters, as has been demonstrated in decisions such as Simsbury (Climax Road), New Canaan (Avalon), and other communities.

FY 2021 Income Limit Area	Median Family Income Click for More Detail	FY 2021 Income Limit Category	Persons in Family							
			1	2	3	4	5	6	7	8
Hartford-West Hartford-East Hartford, CT HUD Metro FMR Area	\$104,300	Very Low (50%) Income Limits (\$) Click for More Detail	36,550	41,750	46,950	52,150	56,350	60,500	64,700	68,850
		Extremely Low Income Limits (\$)* Click for More Detail	21,950	25,050	28,200	31,300	33,850	36,350	40,120	44,660
		Low (80%) Income Limits (\$) Click for More Detail	55,950	63,950	71,950	79,900	86,300	92,700	99,100	105,500

Source: huduser.gov/portal/datasets/il/il2021/2021summary.odn

SECTION 3: What is the Status of Avon’s Housing Stock?

The population of Avon continues to increase.

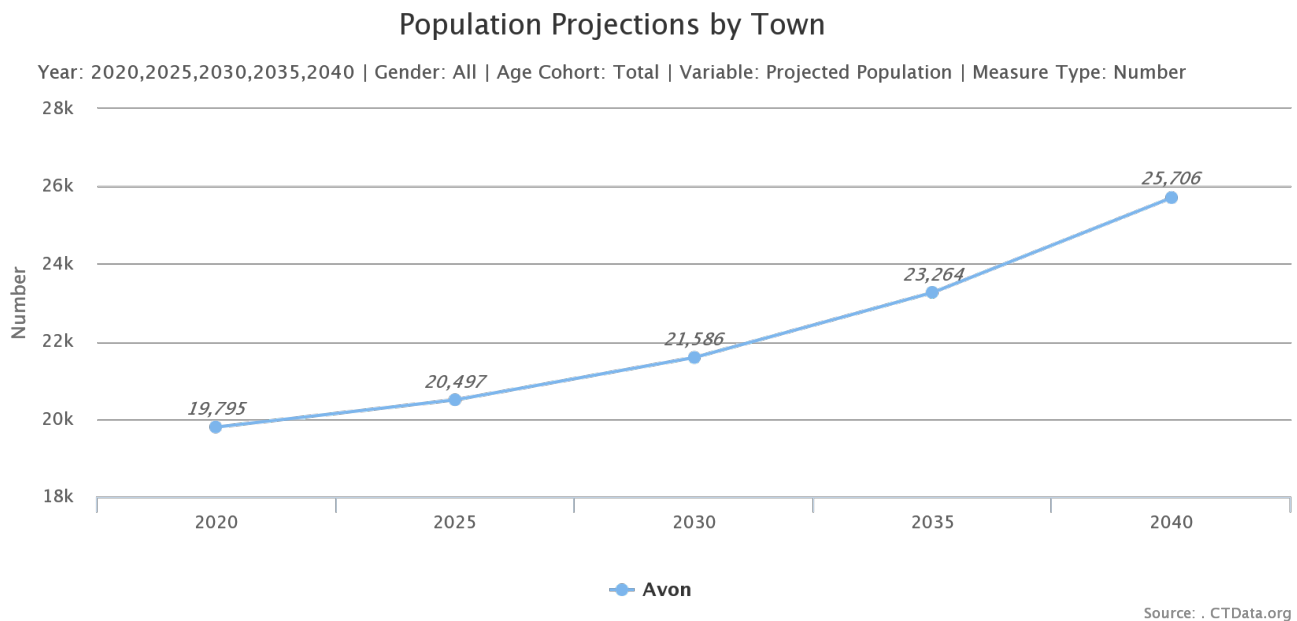
During the years 2000-2018, Avon’s population grew 15.6%, which dramatically outpaced the growth of 4.0% in Hartford County and 4.8% in Connecticut overall. After a few decades of steady growth, Avon appears set to cross the 20,000 threshold for population and headed potentially to add another 25% to that total, possibly reaching 25,000 by the year 2040. As a result, the Town would be prudent to assess factors such as:

- The demographics of the population [including age, ethnicity and race]
- The housing needs of the population
- Community services and support
- Environmental impacts

The Partnership for Strong Communities put together a series of analyses and visualizations

for all Connecticut municipalities to help them understand their current housing stock, demographics, and elements of affordability. Many of the graphics presented in this overview are drawn from their 2020 Housing Data Profiles, which can be found at <https://housingprofiles.psychousing.org>.

The relatively steady pace of population growth is further reflected in the housing permit data, which has roughly tracked overall trends in Hartford County and the state. State Department of Economic and Community Development (DECD) data between 1990 and 2017 reflects the development trends, with the last major peak of activity in the mid-2000s, just prior to the 2008 economic downturn. Avon had a single-year spike in building permits in 2009-2010, attributable in



Source: Connecticut State Data Center

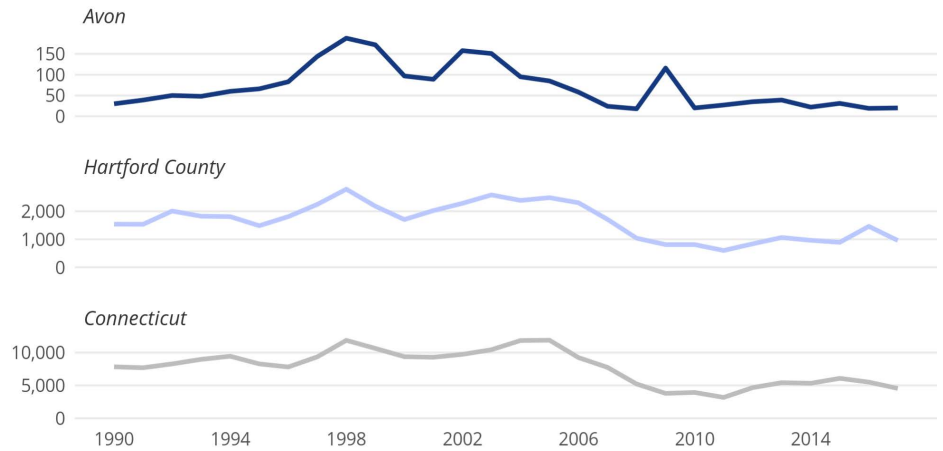
part to a single development that came online. Overall, the state in 2017 was down over 40% in terms of annual building permits for new houses, and Avon was down approximately 33%. The overall trend, however, is a relatively steady course of building permits following the end of the last boom.

As of the 2014-2018 American Community Survey, Avon had 7,406 housing units, with the great majority (75%) made up of single-family detached residential structures, with an additional 12% as attached (condo/townhouse) residences. The remaining 13% of the housing stock were largely multifamily (2+ units per structure) in nature, including 6.6% of the total comprised of larger multifamily complexes (20+ units per structure). There was a smaller number of low density (3-4 units per structure) developments. Statewide, the mix is much more diverse, with approximately 64% of the housing stock comprised of single-family detached units and the remaining 35% are multifamily units.

It is important to note, however, that the American Community Survey numbers are statistical estimates with high confidence, but which still contain a margin of error. They should be used primarily to identify general characteristics and trends. The results of the 2020 U.S. Census are still pending as of the development of this Plan.

Number of building permits per year, 1990-2017

Note: y axis varies between locations



Source: Connecticut Department of Economic and Community Development

Type of Housing Stock in Avon by Units in Structure

TOTAL	7,406	100%
(Single family home) 1, detached	5,545	74.9%
1, attached*	906	12.2%
2 attached	85	1.1%
3 or 4 attached	234	3.2%
5 to 9 attached	60	0.8%
10 to 19 attached	86	1.2%
20 or more attached	490	6.6%
Mobile Home	0	0.0%
Boat, RV, Van etc.	0	0.0%

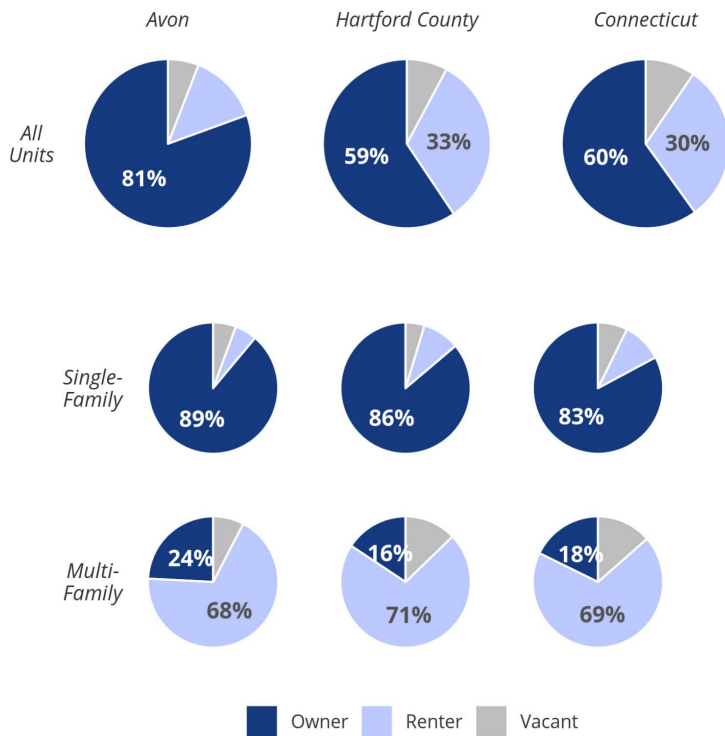
Source: 2018 American Community Survey, 5-year estimates

*The reference to "attached" denotes the number of dwellings/units that share at least one exterior wall with other dwellings/units.



Home Ownership and Rental in Avon

In terms of its existing housing stock, Avon has a much higher percentage of traditional, single-family housing than the state overall, with 87% of its housing stock as single-family units, which includes both attached and detached units. Statewide, that number is 64%, with the remainder as multifamily housing units. As seen in the chart below, the great majority of single-family residences (89%) in Avon are owner-occupied. A higher percentage of Avon’s multifamily units (24%) are owner-occupied (as condos/townhouse units), a higher percentage than Hartford County or the State overall.



For both home rental and home sales prices, Avon costs run between 35-50% above the county and state rates. As of the 2018 American Community Survey (via CERC 2019 Community Profile), the median sales price for homes in Avon was \$378,000, significantly above the Hartford County median of \$235,300 and the overall Connecticut median of \$270,100. The median rent in Town was \$1,404, which is also well above the levels seen in Hartford County median of \$1,044 and state median rent of \$1,123.

Source: Partnership for Strong Communities. Note: This data was the most currently available data at the time of writing of this Plan. The results of the 2020 U.S. Census for housing had not yet been released.

Connecticut Affordable Housing

The Connecticut Department of Housing maintains a list of affordable units in each municipality for its annual publication of the Affordable Housing Appeals List. Affordable units are defined by the state as those units that are subsidized below market rate through deed restrictions, income limitations, or programs like Housing Choice Vouchers or CHFA/USDA mortgages. These programs exist to guarantee the availability and affordability of certain housing units, as opposed to “naturally-occurring” affordable units, which simply reflect market conditions and do not have any deed restriction in place to guarantee affordability.



As of the 2020 Affordable Housing Appeals List, the Connecticut Department of Housing recognized 304 of Avon’s 7,389 housing units (as reported in the 2020 Census), or 4.11% of the total housing stock as Affordable and contributing to the Town’s 10% requirement. Of those, over 80% (244) were governmentally assisted, and largely accounted for by senior and disabled housing developments such as Whispering Pines and Peachtree Village. Most of the remaining Affordable units (44) were home ownership where the owner received mortgage assistance from CHFA or the United States Department of Agriculture (USDA). In order for a municipality to be exempt from Affordable Housing Appeals as defined by Section 8-30g of the Connecticut General Statutes, a minimum of 10% of total municipal housing stock needs to be considered “assisted” under one of the categories below:

Total Housing Assisted in Avon	304 (4.11%)
CHFA/USDA Mortgages	44
Government Assisted Units	244
Tenant Rental Assisted Units	16
Deed Restrictions	0

Source: CT Department of Housing, 2020 Affordable Housing Appeals Listing

As of the 2020 Affordable Housing Appeals List maintained by the Connecticut Department of Housing, 16 units received tenant rental assistance, typically by housing vouchers. None of the units were deed restricted for Affordability as of that count.

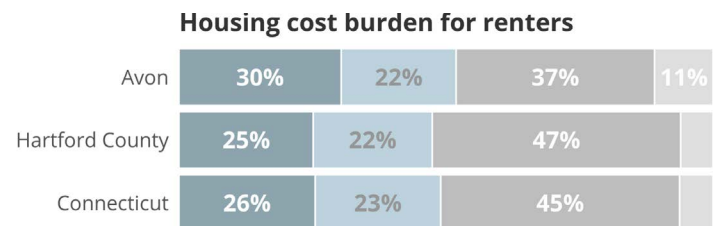
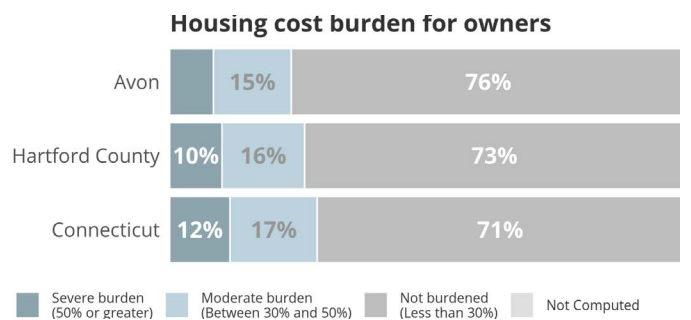
There is an expected, additional 52 Affordable housing units planned for development over the next two-year period. The units are to be included under approved development within Avon’s Attainable Housing Overlay Zone (AHOZ), which includes a single-family, owner-occupied development and a 250-unit rental development consisting of two multi-story apartment buildings and smaller 2-4 unit dwellings. Also there are

two single-family units on Bailey Road under another AHOZ. Recently, an affordable housing development was approved at 20 Security Drive, but is not yet constructed. When completed, it is anticipated that Avon’s affordable percentage relative to the Department of Housing inventory will increase as a result of the expected, additional 52 units. These units will continue Avon’s progress toward the 10% affordability threshold established by CGS Section 8-30g, but there is a recognition that achieving that number will be a process that will extend well past the five-year scope of this first Affordable Housing Plan.

Incomes and Cost Burden

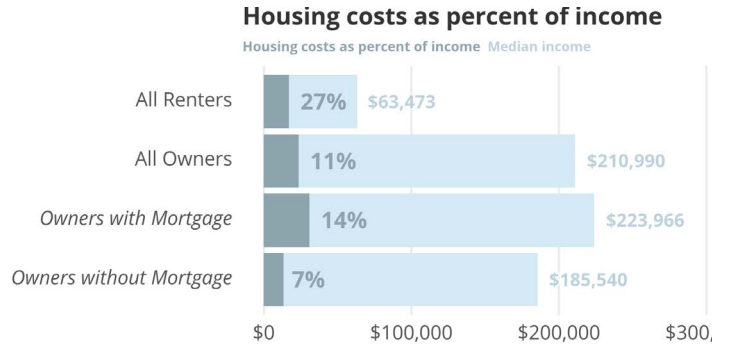
It is not uncommon for both renter- and owner-households to be considered “cost-burdened” by their housing expenses, which includes mortgage/rent, taxes and utilities. Households that spend 30% or more of their income on housing costs fall into this category, which is a strong indication of income insecurity. Households spending at least 50% of income on housing expenses are considered “severely cost-burdened.”

As depicted in the table below, renters in Avon, Hartford County, and Connecticut in general pay a significantly higher percentage of their income for housing than homeowners.



Source: Partnership for Strong Communities

The differences in cost burden between owners and renters in Avon are also reflected in the relative affluence of these two groups. On average, homeowners, with a median household income of over \$210,900, expend just approximately 11% of their income on housing expenses. Renters, with a dramatically lower median household income of just over \$63,000, pay on average 27% of their income on housing. This means that the typical renter in Avon carries a substantial cost burden simply to live in Town. Overall, Avon’s median household income was \$125,536 as of the 2018 American Community Survey. As reflected below, renters incur the greatest housing cost burden as a percentage of their total income.



Source: Partnership for Strong Communities for Town of Avon Housing Costs



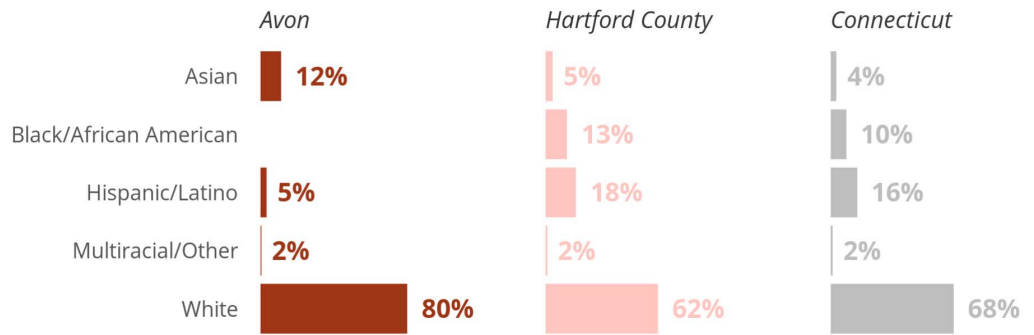
SECTION 4: What is Avon’s Population Profile?

Current Population

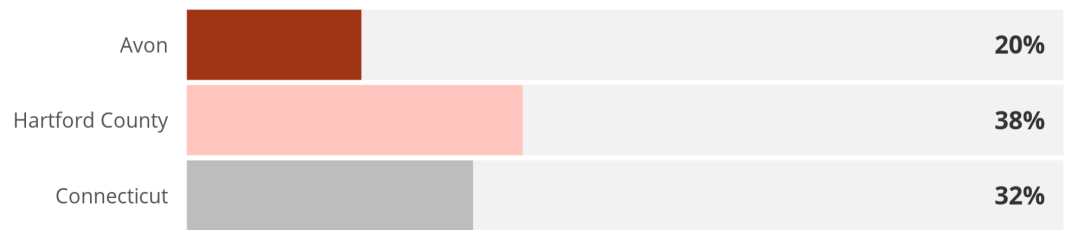
Avon residents are generally older and less diverse compared with populations in Hartford County and Connecticut generally.

As of 2018, Avon had 18,338 residents, which were predominately (80%) white non-Latino, with the remaining 20% BIPOC (Black, Indigenous, and People of Color), divided largely between Hispanic/Latino (5%) and Asian (12%) populations.

The largest race/ethnicity group in Avon is White at 80% of the population



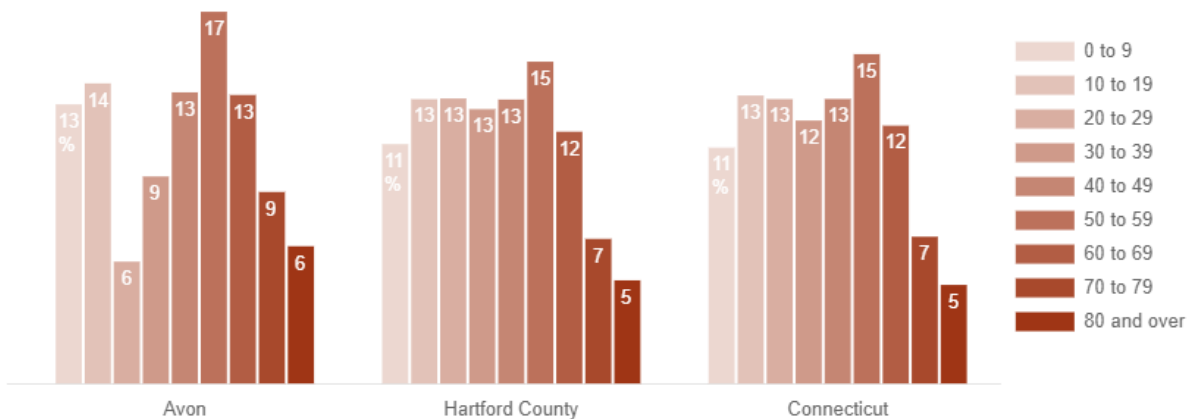
Avon is less diverse than Connecticut



The median age in Avon is 45 years, compared to Connecticut’s median age of 40.8 and Hartford County’s age of 44. The largest population cohorts in Avon were in the 50-59 age range, representing 17% of the total population. The 40-49 and 60-69 age range, each represented approximately 13% of the population. Overall, 45% of the total population of Avon was

over 50 years old. Avon also has a considerable youth population, with children (19 and under) making up 27% of the overall population, a higher percentage than the county and state.

Source: Partnership for Strong Communities



Source: American Community Survey 2018, 5-year estimates, Table S0101
Visualization created by [CTData Collaborative](#)

As an established suburban community appealing to families, Avon has slightly larger average household sizes compared to Hartford County, but similar to family sizes in the state overall. Avon's average household size was 2.53 people as of the 2000 Census. While both county and state saw relatively stable household sizes in the subsequent decade-plus, Avon actually saw a reversal to the broader trends of shrinking households. As of 2018, household sizes in Avon grew to an average of 2.6 persons per household. Avon had a lower percentage of householders living alone (24%), and higher percentages of older (60+ year old) household member and younger (<18) household members than both Hartford County and the state. These snapshots and trends will be important considerations when projecting and planning for housing needs and affordability into the future. The population growth projected for the Town of Avon may not be linearly related to an increased demand for housing units if household size continues to grow.

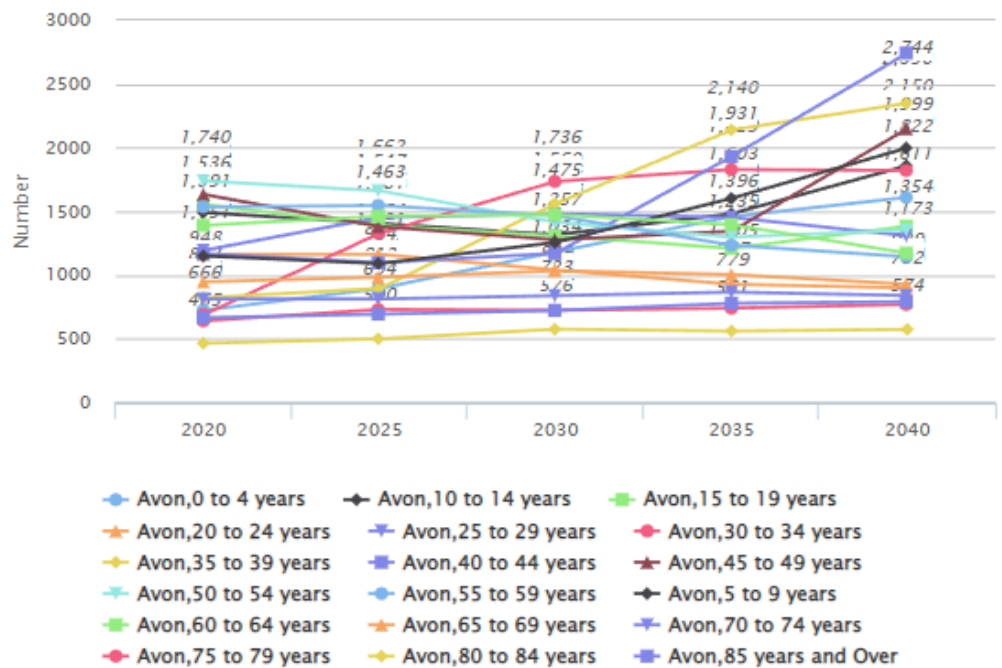


Projected Population

The Connecticut State Data Center predicts that Avon's population, which grew steadily between 1970-2000, is likely to continue or even accelerate in growth over the next twenty years. Thus, Avon's population is estimated to increase from 20,000 (based on the 2020 U.S. Census results) to 25,000 over the next two decades.

The State Data Center anticipates that nearly all younger age groups will increase in overall numbers in Avon, with the highest relative increase among young professionals, ages 20-39. The sub-group of 35-39

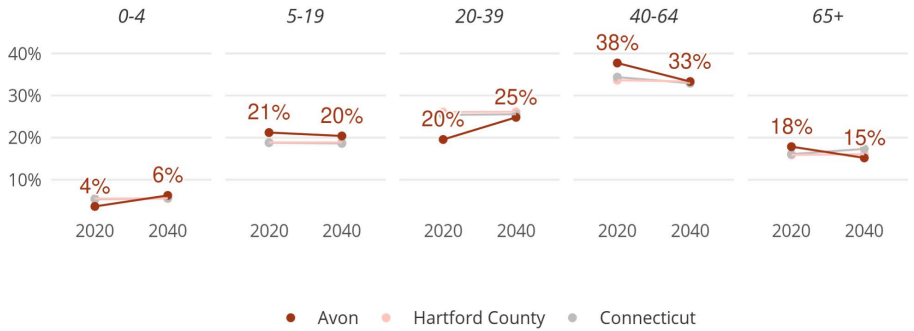
Population Projection, Avon, CT



Source: . CTData.org

years old is anticipated to dramatically increase from its 2015 number of 835 to just over 2,500 in 2040, a change of approximately 200%. In contrast, the newer senior citizen group (60-64 years old) is expected to see numbers decrease from 1,326 in 2015 to below 1,175 in 2040. Given the established track record of a community with larger, single-family residences, it is not surprising to see family populations projected to increase and “downsizing” seniors likely to depart.

People age 20-39 are projected to grow the most in the next 20 years in Avon



Source: Connecticut Data Center

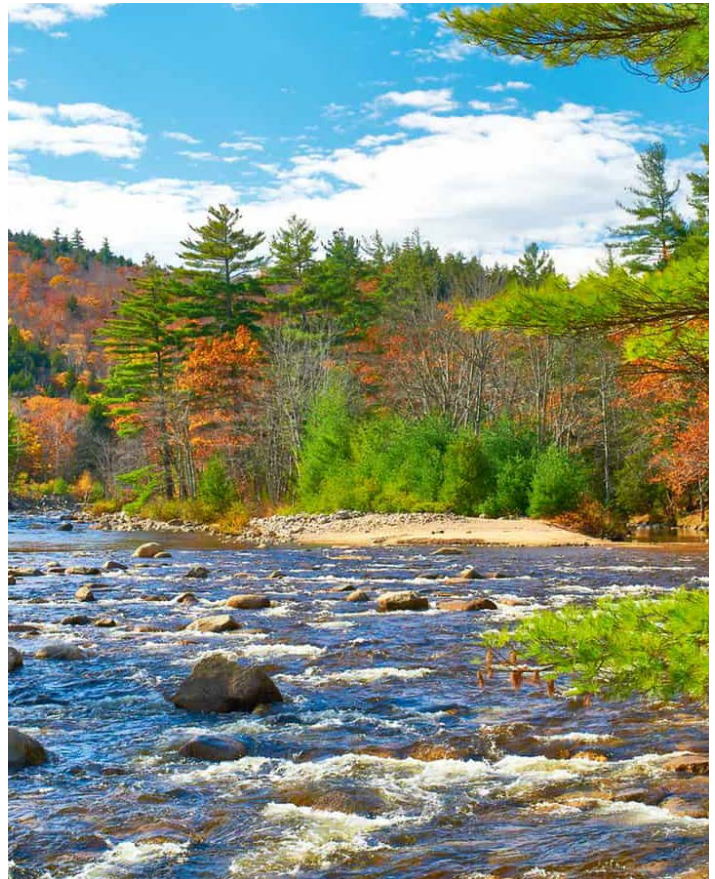
The relatively short scope of this Plan – five years – will allow opportunity for revised projections and flexible responses to changing conditions. Further, the projected numbers are simply that – projections. Avon’s population conditions do not exist in a vacuum and are influenced by trends throughout Connecticut.

Infrastructure and Other Trends

Before the COVID-19 pandemic of 2020, Connecticut was seeing a significant, state-wide exodus of two large population groups: so-called “Baby Boomers” born between 1945-1965, and “Millennials,” born between 1983-2000. Both groups seemed to be moving out of Connecticut’s rural and suburban communities, seeking more populated, vibrant, walkable places to live. It appeared that the suburban model was on the decline, despite the apparent countervailing trends in specific suburban communities like Avon.

As COVID-19 spread more quickly in larger, urban areas, real estate in lower-density areas in southern New England saw dramatic increases in demand. According to The Warren Group, which publishes The Connecticut Record, median home prices increased by over 17% in 2020 from 2019, a jump of over forty thousand dollars. This continued as more and more workers and students found themselves working or learning from home and alleviating the need for living in close proximity to work or school. Communities that are well-positioned to support both the small-

town lifestyle and the technological infrastructure for remote working and learning could benefit as they compete to retain those residents long term. As part of maintaining the Town’s attractiveness as a work-from-home community, Avon will also need to invest in infrastructure including possibly expanding sewer and public water service areas and enabling better access to high-speed data and broadband resources.



SECTION 5: How Do Avon’s Current Policies Affect Affordable Housing?

From a land-use standpoint, the single most important document a municipality develops is a Plan of Conservation & Development (PoCD). This document The PoCD establishes the Town’s shared vision for growth, development, and protection of its resources over a period of ten years. It also guides the development of policies, including Zoning Regulations, to be used as tools to achieve the Town’s overall vision.

The purpose of this section of the Plan is to evaluate the overall regulatory environment in Avon to get a sense of how the Town’s policies currently facilitate and/or encourage the development of Affordable Housing.

The 2016 POCD uses a sustainability framework to develop its assessment and establishment of goals. The sustainability framework seeks to balance the economic, environmental, and social interests. The POCD Introduction states:

“.. this Plan addresses .. Social Sustainability by:

Creating additional opportunities for a broad range of housing that can meet the needs of both younger and older buyers (a significant portion of Avon’s population) and reflecting an increased interest in the ability to walk or bike for goods, services, and health.

Recommending changes to make it easier to establish accessory apartments ..” (2016 Avon POCD, Page 6)

What follows is a table that summarizes the current policy, how the policy relates to housing development, any active proposals for policy change, and recommendations for potential changes.



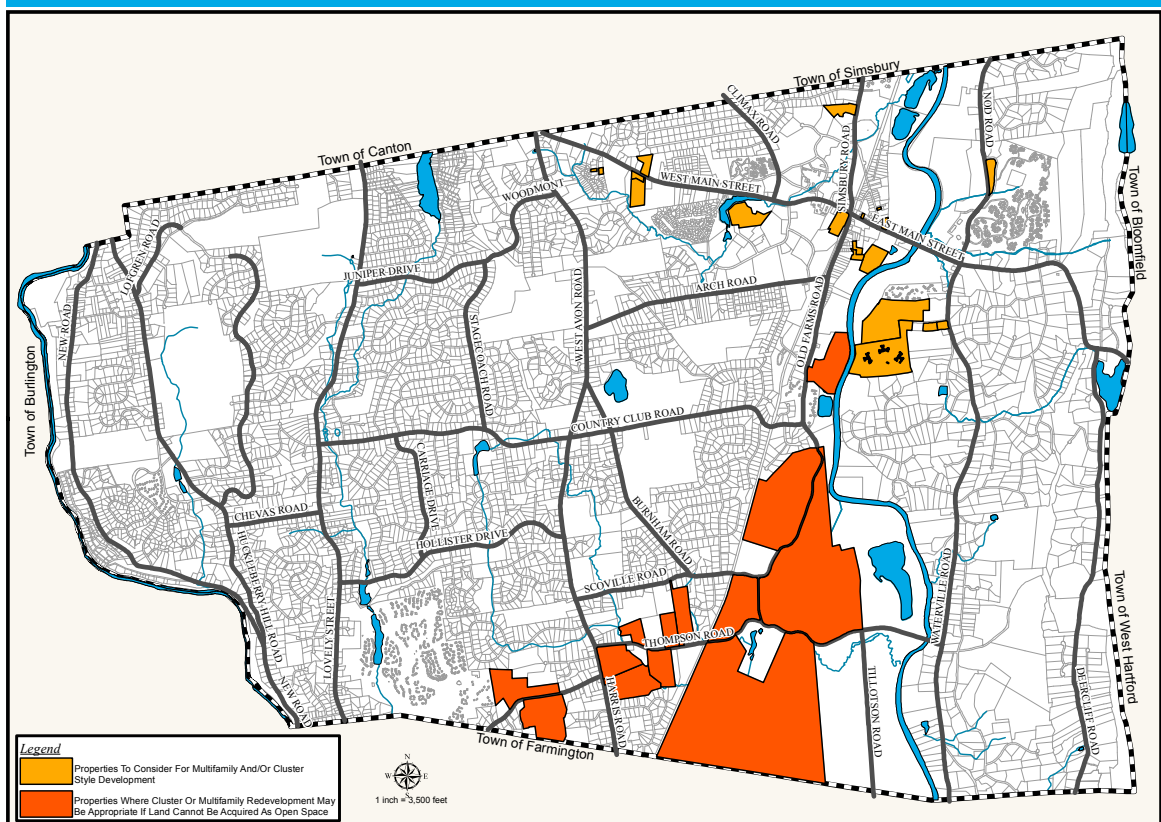
Plan of Conservation & Development

Adopted in November of 2016, the PoCD outlines specific goals and policies related to the Town's housing stock. Including these points within the PoCD is important. It serves to further demonstrate to business owners, developers, residents, and property owners that the Town's vision for the future includes the creation of a more diversified, balanced, and sustainable housing stock. See Section 7 on Recommended Actions for the Town.

POCD Policy Statement	Relevance	Potential Measures or Implications
Encourage adaptive re-use of historic properties where economically and physically feasible (<i>Historic Resources, p.63</i>)	Many historic properties, particularly former industrial or community facilities, hold significant potential for adaptive reuse for housing.	Addition of housing to historic properties should be encouraged, but development of specific regulatory requirements for adaptive re-use would be needed to ensure design integrity of historic properties.
Promote the development of multifamily projects (both condominiums and rental apartments) across a broad range of price points to meet present and projected needs. Where possible, permit units in a walkable environment to provide easy access to shopping and services. (<i>Housing, p. 77</i>)	Ensuring a broad range of housing opportunities across income ranges, age demographics, and accessibility types, is critical to a vibrant and diverse community.	This policy is not tied to a specific set of action steps. It is not clear who is responsible for undertaking this promotion. More clarity of implementation may be needed.
Consider amending Zoning Regulations providing incentives for the inclusion of housing units meeting the State definition of affordable. Promote existing Planned Residential Development Regulations (PRD) (<i>Housing, p. 77</i>)	Recognizing that housing development is market-driven, the Town is seeking to find ways to incentivize development of affordable housing through regulations is a valuable tool.	Specific action steps and policies which could be considered, such as Incentive Housing, density bonuses, Inclusionary Housing per CGS Sec. 8-2i, and methods of promoting PRD.
Consider amending Zoning Regulations pertaining to Transfer of Development Rights (TDR) to provide further incentives in the area of assignable density to make it more likely that it will be utilized. (<i>Housing, p.77</i>)	TDR programs can harness market forces to encourage both preservation of valuable open space and focus housing development in appropriate and properly-served areas, but the economics need to be properly calibrated with current conditions.	Consider additional incentives such as increasing allowable development density in receiving areas to make the development credits more valuable for both parts of the TDR balance sheet.
Promote the use of cluster development on remaining larger parcels with access to public water and sewer as a means to preserve rural vistas along existing roadways and the preservation of open space. Consider zoning amendments which would increase permitted density to incentivize an applicant to choose this form of development. (<i>Housing, p.77</i>)	Clustering development holds the potential for increasing conservation efforts by reducing development footprints and preserving open space.	Clustering development with a density-neutral result may encourage land preservation, but does not dramatically incentivize expansion of housing opportunities. Combining cluster development with other programs such as incentivized development can promote both housing and preservation goals.

POCD Policy Statement	Relevance	Potential Measures or Implications
Consider properties listed in Tables 7-8 and 7-9 and others, as may be deemed appropriate by the Commission, for the development of compact, single-family detached cluster development or multifamily housing. <i>(Housing, p.78)</i>	Developing a list of specifically targeted properties with the proper attributes for development is useful for both town entities and potential developers in confirming interest and willingness for growth.	A property-by-property assessment of development potential of these properties should be undertaken with a focus on the housing needs of the Town, as well as its open space preservation goals.
Consider changes to Zoning Regulations which would permit an accessory apartment as of right. <i>(Housing, p.78)</i>	Accessory apartments are easy ways to add lower-cost housing opportunities very efficiently and without changing neighborhood character.	Making accessory apartments a staff-level zoning permit with appropriate regulatory standards should be considered, as well as providing homeowners guidance about the topic and process.
Consider broadening opportunities for residential dwelling units in commercial zoning districts. <i>(Housing, p.78)</i>	Allowing for mixed-use opportunities can provide a wider range of housing options while adding some vitality and “feet on the street” in commercial areas.	Consider extending the accessory apartment provision to commercial areas, on upper levels, or providing a fuller mixed-use allowance, such as live-work situation expansion.

Properties That Warrant Added Study For Multifamily And/Or Cluster Style Development Map 7-1



Plan of Conservation and Development 2016

Zoning Regulations

The Town has a current set of Zoning Regulations in effect, which have guided development in Avon for decades and have been revised periodically. In 2016, the Town adopted an updated version of an Attainable Housing Overlay Zone (initially adopted in 2007) to promote additional housing opportunities as enabled by Section 8-13(m-x) of the Connecticut General Statutes and has made other changes in implementation of the 2016 Plan of Conservation & Development. There are several areas within the Regulations that can encourage or discourage the development of additional housing units, of all types. Many of these areas are outlined below, and as with the POCD overview, recommendations regarding affordable housing are included as a point of consideration for the furtherance of affordable housing within the framework of this Plan:

TOPIC	RELEVANCE	CURRENT REGULATION	POTENTIAL REVISIONS TO REGULATIONS OR PROCESS
<i>Residential Density</i>	Increased densities allow for more housing units on a given parcel of land, increasing opportunity and lowering costs.	Section IV.A.5 and IV.A.6 set forth minimum lot size for residential properties, ranging from 2 acres/lot (0.3 u/ac) in the RU-2A district to 15,000 sq.ft (2.2 u/ac) in the R-15 district. IV.A.7 requires a minimum unit size for single-family residences of 1,000 square feet.	Residential densities might be increased by moving to a soil-based approach to allow higher unit counts on well-drained soils in areas without public sewer. Areas served by public sewer could also see density increases to 3 or 4 units per acre without sacrificing neighborhood context. Minimum building sizes could also be coordinated with applicable health and building codes.
<i>Cluster Development</i>	In exchange for increased open space or conservation land, clustering allows for smaller lot sizes and reduced expenditures on public infrastructure.	Section IX.B allows for clustering of developments to provide for flexibility of design and preservation of open space.	A density bonus for cluster development, particularly for developments that provide for some percentage of affordable units, would incentivize the use of this approach, which also increases open space holdings.
<i>Accessory Apartments</i>	Allowing secondary units in single-family areas can effectively double residential unit densities in a low-impact way and generate significant housing opportunity.	Regulations allow attached accessory apartments by staff review and detached accessory apartments by Special Exception. The regulations recommend the apartment be affordable.	The requirements of Section IV.A.4.q are extensive and restrictive enough that a staff-level review should be more than sufficient to satisfy the Commission's concerns about public health, safety, and neighborhood characteristics. Accordingly, the permitting could be easily done at an as-of-right staff level for both attached and detached accessory apartments.

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TOPIC	RELEVANCE	CURRENT REGULATION	POTENTIAL REVISIONS TO REGULATIONS OR PROCESS
<i>Conversion of Single-Family to Multi-Family</i>	Larger and historic single-family units could be updated to create multiple internal apartments, increasing opportunity where appropriate.	Section IV.A.4.n allow existing buildings to be converted to up to two residential dwelling units via Special Exception.	If larger existing buildings can accommodate minimum multi-family unit sizes of 600 sq.ft/unit without adding to the building footprint, more than two total dwellings could be allowed. As with accessory apartments, the other regulatory requirements are sufficiently rigid and prescriptive that they could be reviewed on a staff level.
<i>Multi-Family Development</i>	Multi-family is traditionally the best pathway toward affordable housing by virtue of unit size and density	Section IX.A allows for multiple-dwelling developments, up to 4 units/acre on a minimum of 5-acre properties, via Special Exception in any residential zoning district.	In certain areas with existing sewer and water infrastructure, access to public transportation or in close proximity to employment centers, and in areas with existing multifamily settlement patterns, the Town could consider increasing allowable densities for multifamily housing, particularly if a portion of the development is set aside as affordable.
<i>Inclusionary Zoning</i>	Section 8-2i of the State Statutes allows towns to require affordable set-asides	Not included in the current Regulations.	For larger developments (of 10+ units, for example), the Town could require a percentage set aside for income-restrictions, or otherwise establish a housing trust fund to finance the establishment of affordable units.
<i>Incentive Housing</i>	Section 8-13n of the State Statutes allow communities to create higher-density areas with 20% affordable stock	Section IX.G provides for an Attainable Housing Overlay Zone which follows the provisions of CGS Section 8-13n, for both exclusively residential and mixed-use districts. The AHOZ has been successfully used twice to permit over 250 units of multifamily housing.	The current AHOZ is an overlay, which means it does not exist on the current Zoning Map until it is "landed." The town could consider proactively, discussing and applying these regulations and target specific properties or areas of Town, based perhaps on Map 7-1 of the Plan of Conservation & Development.

Review of Avon Zoning Regulations, Page 2

TOPIC	RELEVANCE	CURRENT REGULATION	POTENTIAL REVISIONS TO REGULATIONS OR PROCESS
<i>Mixed-Use</i>	Allowing residential units to be added in commercial areas can increase opportunity and economic diversification where appropriate.	Mixed use developments are allowed by Special Exception in the Avon Village Center Zone, and as work/live units in the Commercial-Retail Zone by Special Exception. Mixed use developments with residential units are also included as part of the Attainable Housing Overlay Zone regulations.	The Town provides multiple pathways toward allowing a mix of residential and commercial/retail through its Zoning Regulations. The requirements of the Mixed- Use Development Plan (MUDP) are extensive and potentially quite costly for regulatory compliance. For projects including affordable housing, some of these requirements could possibly be relaxed.
<i>Transfer of Development Rights</i>	Focusing higher-density development in targeted areas reduces infrastructure costs while simultaneously protecting important conservation lands.	Section IX.F lays out a TDR program and the Zoning Map delineates “sending” and “receiving” areas of Avon. Permitted densities are allowed to double to 8 units/acre for receiving zones.	This is an innovative and progressive program that has not been used for development in Avon yet. Promotion of the program should be a priority, particularly for under-used lands targeted, not for open space, but for development. Consider updating this TDR process.

As noted earlier, the AHOZ has been very successful in Avon over the past few years in encouraging and enabling the development of 300+ housing units, both single-family and multi-family, which directly increases the availability of affordable housing opportunities in town. These projects are expected to be completed within the next year or two. These include Avon Mill/Avon Place and Village Center.

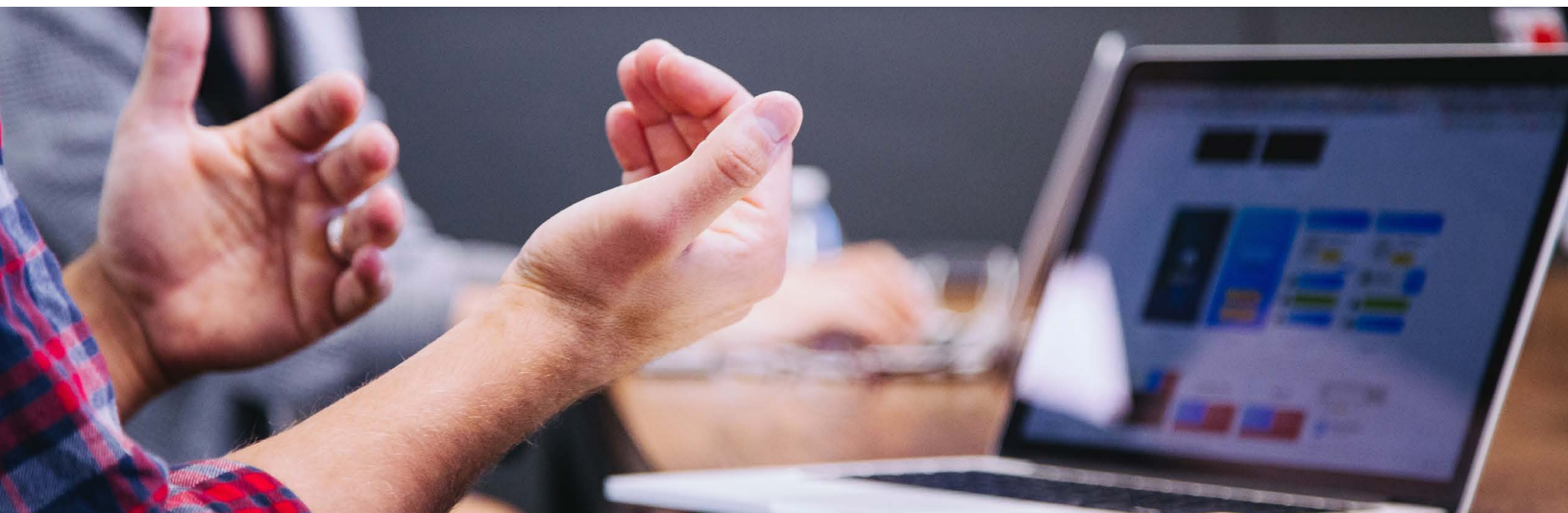
In addition, a recent (2021) approval of a 176-unit 8-30g housing application for Security Drive will also increase the number of affordable units to an even greater number.

Specific recommendations for targeted changes to the regulations and the PoCD focused on implementation and tracking are included in the recommendations section of this Plan.

SECTION 6: What Actions Should Avon Consider?

> Establish a Task Force on Housing:

To maximize the chances of success of delivering upon the mandate of CGS §8-30j and “increase the number of affordable housing developments” in Avon, a new Housing Task Force should be established. This Task Force could be created and managed through the Planning & Zoning Commission and include three representatives from the Commission, Town staff, and two at-large Avon residents. As this Task Force is not a regulatory entity, it can be created and managed in a way that balances the flexibility for the Town (to avoid onerous election or appointment processes) with a strong commitment to ensuring that the goals of the Plan and housing promotion generally remain a clear focus. The Task Force should oversee the implementation of the Plan and provide regular reporting and recommendations to the Commission as a whole on progress.



> Promote Accessory Dwelling Units (ADUs):

As of July 2021, Connecticut enacted a new law that would allow accessory apartments to be allowed in virtually any residential district across the state with a staff-level review. Applicants would not be required to appear before a municipal commission to seek a special exception. Public Act 21-29, includes a municipal opt-out provision that would allow a community (via 2/3 majority votes of both the Planning & Zoning Commission and Town Council) to eliminate this as-of-right provision. While the Commission recently loosened its ADU regulations, the Town has not voted whether to opt-out as of the date of the Plan.



Avon does not currently have a significant number of ADUs (less than 1% of housing), which if promoted could increase the number of naturally occurring affordable units. Efforts should be taken to educate the community about the benefits of ADUs. The Town could promote ADUs through local papers, notifications on the Town website and social media pages, and its newsletter. The Town could also develop a guide as to what ADUs are, what types can be developed, and the regulatory and construction processes involved. Many property owners facing either the need for additional income or a space for extended family, or health care provider for young or old, would benefit from education and awareness about ADUs.

> **Promote Attainable Housing Overlay Zone, Transfer of Development Rights Options, and Live/Work Units:**

In its process toward recognizing the need for housing opportunity and fostering projects, particularly after adoption of the 2016 Plan of Conservation & Development, the Town developed several regulatory tools, including a Transfer of Development Rights (TDR) program, an Attainable Housing Overlay Zone (AHOZ), and the allowance of Live/Work units. These regulatory programs allow for multifamily development at higher densities and in more flexible arrangements than underlying zoning and express the Town's preference for targeted housing opportunities and collaboration with developers. As of the drafting of this Plan, the AHOZ regulation had been applied to two development projects, with eight units of multifamily constructed and another 250 approved and ready to be built. The TDR program has not been used yet in Avon and should be examined by Town Staff to identify opportunities to make it more visible and attractive to property owners and easier to use.

The Planning & Zoning Commission, along with Town staff, should further identify potential development of properties, including properties identified in Map 7-1 (Sections 7-8 and 7-9) of the Plan of Conservation & Development, that were of sufficient size, scale, and location to support this type of development.

> **Explore conversion of existing housing stock to Affordable Housing:**

The housing units that "count" toward the Department of Housing's accounting of units toward the Affordable Housing Appeals Act includes not only income limited and deed restricted units, but also those homes that are financed by mortgage assistance through the Connecticut Housing Finance Authority (CHFA) or U.S. Department of Agriculture (USDA) or other governmental sources which may be available. These programs provide mortgage assistance in such a way that first-time and lower income homebuyers can afford to purchase properties that they would ordinarily not be able to acquire. Historically, a low percentage of Avon's units counted toward 8-30g fall under this category (44



of the Town's 304 units as of 2019). The raw numbers of this are relatively low to Avon's total housing stock of over 7,000 homes and could be increased to become a more significant piece of the Town's affordability puzzle. Additionally, the Town could explore various incentives, including property tax relief, to encourage landlords with rental properties to place income restrictions on these existing units to make them more available to renters across the income spectrum.

While the Town has links on its Social Services web page to CHFA programs, there is not a robust program within Avon to encourage homebuyers and home-seekers to be aware of and take advantage of these resources. As likely as not, it could fall to the familiarity of individual realtors and mortgage brokers to ensure that buyers are properly informed. The programs can dramatically increase the population of potential buyers who would love to include certain homes in Avon in their search. Thus, with a relatively simple outreach effort targeted at the real estate community and through using existing informational resources of USDA and CHFA and other similar programs, the Town could encourage the use of these programs and experience an increase in this type of affordable housing.



SECTION 7: Goals And Implementation

What Should Avon's Goal Be?

The requirement of the State Statute governing Affordable Housing Plans is simply that each municipality must develop a plan to “increase the number of affordable housing developments” in that community. While this requirement lacks specificity, the Town of Avon will seek to meet that requirement in both qualitative and quantitative ways. For the five-year period 2022-2027, the Town of Avon will seek to increase the number of affordable housing developments in Avon as follows:

1. *Review existing housing stock to increase the number of affordable units through deed restrictions, income limits, use of Connecticut Housing Finance Authority or other government assistance home financing programs.*
2. *Support review and approval of accessory dwelling units*
3. *Review the concept of Transfer Development Rights (TDR) and determine whether revisions to the Town's existing TDR regulation can help the dual goals of housing density and open space protection*
4. *Review the housing needs of Avon's aging population and target development opportunities*
5. *Continue promoting use of the existing Attainable Housing Overlay Zone (AHOZ)*
6. *Promote public awareness of Avon's housing efforts*

Action Items	Lead Entity to work with Planning & Zoning	Partner Entities	Priority
1. Establish a Task Force on Housing			
Create and establish membership of Task Force with 5 voting members	Planning & Zoning Commission		High – Year 1
Develop Charge and initial priority list	Housing Task Force	Town Staff	High – Year 1
Provide annual progress reporting	Housing Task Force	Planning & Zoning Commission	Moderate – Year 2 and ongoing
2. Promote Accessory Apartments (ADUs)			
Develop public outreach information on ADUs and review with the Commission	Housing Task Force	Town Staff	Moderate – Year 2
Host public information forum with homeowners, builders, and realtors	Housing Task Force	Town Staff	Moderate – Year 2

Action Items	Lead Entity to work with Planning & Zoning	Partner Entities	Priority
3. Promote Attainable Housing Overlay Zone, Transfer of Development Rights Options, and Live/Work Units			
Promote opportunity to public and property owners	Town Staff	Planning & Zoning Commission, Housing Task Force	Moderate – Year 2
Review of AHOZ and TDR regulations for area of potential improvement to encourage wider use	Town Staff	Housing Task Force	Moderate – Year 2
Conduct outreach to property owners of land identified in Map 7-1 (Sections 7-8 and 7-9) of the PoCD to inform them of TDR and AHOZ opportunities	Town Staff	Housing Task Force	Moderate – Year 2
Investigate the possibility of adding additional properties to “receiving areas” for TDR	Planning & Zoning	Town Staff	Moderate – Year 2
Add more eligible areas for Live/Work units	Planning & Zoning	Town Staff	Moderate – Years 2-3
Explore availability of funding to aid in construction of deed-restricted accessory units	Housing Committee	Town Council	Moderate – Years 2-3
4. Explore conversion of existing housing stock to Affordable Housing			
Compile information about CHFA, USDA, and other financing resources	Town Staff	Housing Task Force	High- Year 1
Develop and promote informational resources among real estate and home mortgage professionals	Housing Task Force	USDA and CHFA staff	High – Year 1 and Ongoing
Post and update resource materials and program information on Town websites and public information locations	Town Staff	Housing Task Force	High – Year 1 and Ongoing
Consider incentives to encourage conversion of existing housing stock to affordable housing through deed restrictions and income limits	Housing Task Force	Town Staff, Town Council	Moderate – Years 2-3

Links and References

- [CT General Statutes Section 8-30g](#)
- [Avon's 2016 Plan of Conservation and Development](#)
- [Avon Zoning Regulations](#)
- [Partnership for Strong Communities Housing Profiles](#)
- [2021 Income Limit Data from US Department of Housing and Urban Development](#)
- [2018 American Community Survey](#)
- [CT Department of Economic and Community Development \(DECD\)](#)
- [CT Department of Housing, 2020 Affordable Housing Appeals Listing](#)
- [CT State Data Center](#)
- [The Warren Group, "The Connecticut Record"](#)
- [Connecticut Housing Finance Authority \(CHFA\)](#)
- [US Department of Agriculture](#)



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