

KENT

Incentive Housing Zone Report



**Incentive Housing Zone Study Committee
Revised Final Report (with Addenda)**

November 2016

Contents

Overview..... 1

Summary Of IHZ Program 1

Study Areas 3

Mixed Use Area 4
 Considerations4

Field Area 10
 Considerations10
 Alternative Development Concepts.....13

Summary..... 25

Addendum 25

Appendix..... 37

Town of Kent
Incentive Housing Zone Study Committee

Matt Winter, Chairman
Richard Chavka, Member
John Johnson, Member
Adam Manes, Member

William Bachrach, Alternate
Michael Everett, Alternate

Overview

In 2015, the Town of Kent received a grant from the State of Connecticut to evaluate the establishment of an “Incentive Housing Overlay Zone” (as enabled by Section 8-13m of the Connecticut General Statutes) within the Kent village area. The grant authorized the following specific activities:

- Sketch plans of housing scenarios
- Sketch plan of road / utilities layout
- Drafting of an Incentive Housing Overlay Zone (IHOZ) regulation

Kent has long recognized the need for affordable housing and has worked over the years to create affordable housing opportunities within the community. Obtaining the grant was another step towards evaluating ways to assimilate affordable housing into the community.

This report summarizes the findings and recommendations of that evaluation.

Summary Of IHZ Program

The Incentive Housing Overlay Zone program is intended to encourage the creation of affordable housing opportunities in Connecticut and educate communities about different types of housing. The program provides:

- Funding for technical studies,
- The possibility of “incentive payments” from the State for communities that adopt State-compliant regulations and/or establish State-compliant units.

For an “incentive housing overlay zone” regulation or development to be considered “State-compliant”, it must comply with the following standards:

An Eligible Location	<p>A “state-compliant” incentive housing zone / development must be in a location:</p> <ol style="list-style-type: none">1. consistent with the state plan of conservation and development, and2. considered an eligible location:<ol style="list-style-type: none">a. Near a transit station, including rapid transit, commuter rail, bus terminal, or ferry terminal;b. In an area of concentrated development such as a commercial center, existing residential or commercial district, or village district (CGS 8-2j); orc. In an area that, because of existing, planned or proposed infrastructure, transportation access or underutilized facilities or location, is suitable for development as an incentive housing zone.
-----------------------------	---

Minimum Density Required	<p>A “state-compliant” incentive housing zone regulation must provide a <u>minimum</u> allowable density requirement for an incentive housing development of:</p> <ol style="list-style-type: none"> 1. Six units per developable acre for single-family detached housing; 2. Ten units per developable acre for duplex or townhouse housing; and 3. Twenty units per developable acre for multifamily housing or mixed-use development. <p>An exception to the <u>minimum</u> allowable density requirement may be made when:</p> <ol style="list-style-type: none"> 1. substantial limitations on sewage disposal, water supply, traffic safety or other existing infrastructure in a community of less than 5,000 residents prevent adoption of the minimum densities; or 2. the land is owned or controlled by the municipality itself, an agency thereof, or a land trust, housing trust fund or a nonprofit housing agency or corporation and 100 percent of the proposed residential units will be subject to an incentive housing restriction.
Minimum Density Increment Required	A “state-compliant” incentive housing zone regulation must constitute an increase of at least twenty-five per cent above the density allowed by the underlying zone.
Approval Type	A “state-compliant” incentive housing zone regulation must permit incentive housing development by an <i>as-of-right approval</i> (i.e. – by zoning permit, subdivision approval, or site plan approval only - not by special permit or zone change).
Affordability Component	A “state-compliant” incentive housing zone regulation must provide that at least 20 percent of the units are affordable for at least 30 years for persons or families earning 80 percent or less of the area median income.
Design Standards	A “state-compliant” incentive housing zone regulation may establish design standards for incentive housing developments provided the design standard do not unreasonably impair the economic or physical feasibility of constructing housing at the minimum densities and with the required incentive housing restriction.
Overlay Zone	A “state-compliant” incentive housing zone must be created through establishment of an overlay zone.
Non-Elderly Housing	Residential units that are part of a development that constitutes “housing for older persons” are not eligible for payments.

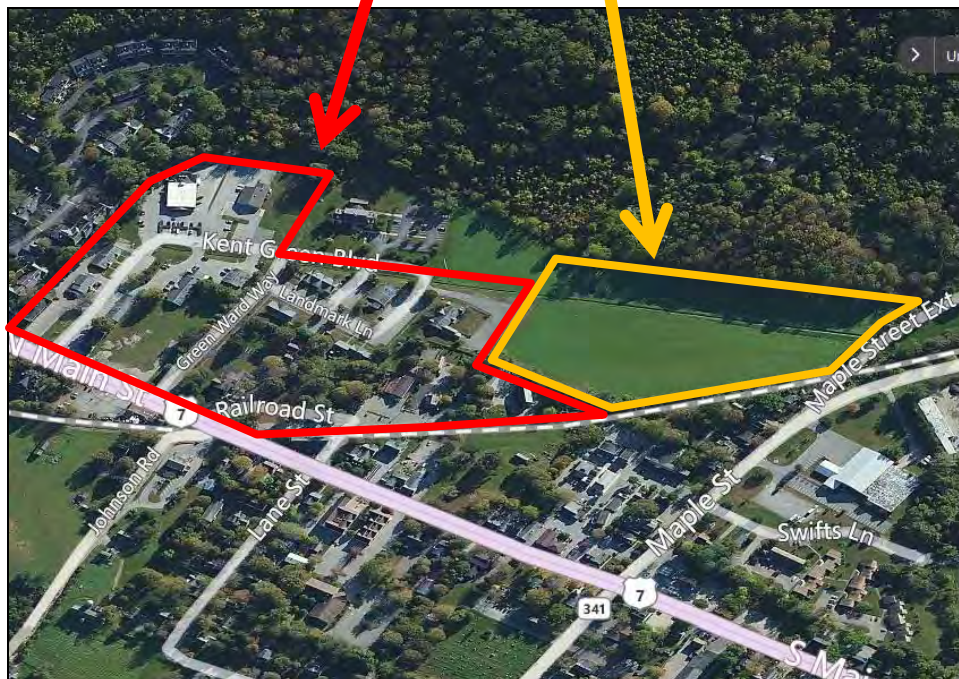
Study Areas

The Incentive Housing Overlay Zone approach was considered for two parts of the Kent Village area:

- The business areas around Kent Green Boulevard, Greenward Way, and Landmark Lane generally located between the toe of the slope on the east side of Route 7 and Main Street (“Mixed Use Area”).
- The field south of the Town Hall and extending southward to the railroad tracks and Maple Street Extension (“Field Area”).

Mixed Use Area

Field Area



Mixed Use Area

Considerations

The “Mixed Use Area” is zoned Village Center Commercial and is developed with a variety of commercial buildings. Most buildings are one-story in height.

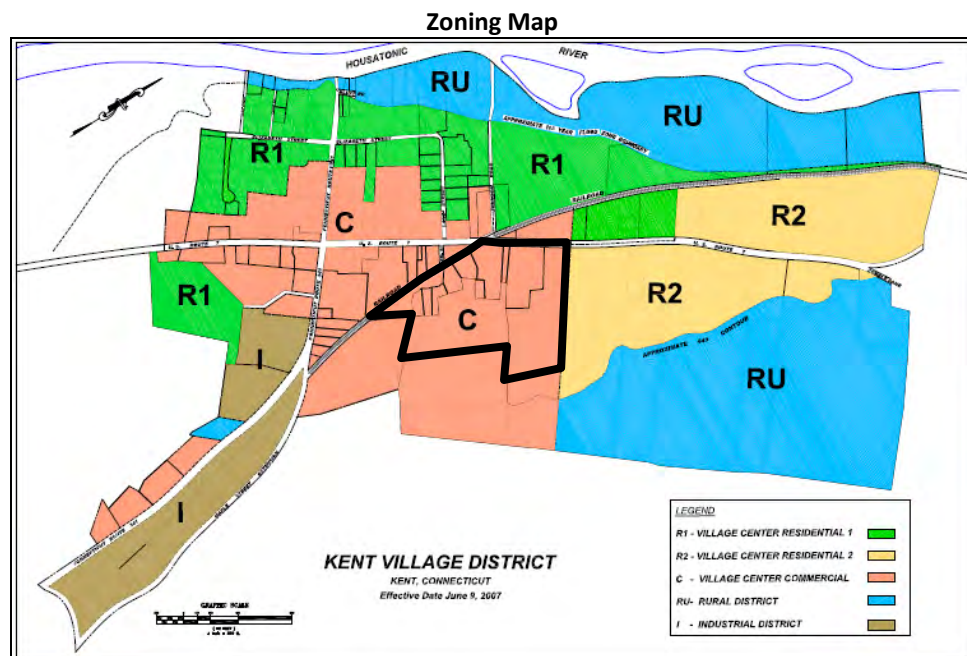
While a supermarket, the Post Office, and Town Hall are located at the toe of the slope, the area is located away from Route 7 and uses have limited visibility from the roadway (vehicles) or sidewalks (pedestrians). This has contributed to an overall lack of vibrancy and commercial success.

This area could accommodate more development potential and intensity and doing so would support the overall development of the village. Adequate utilities (water and sewer) and access are available to support additional growth.

Mixed residential and commercial use is currently allowed as a Special Permit use (ZR Section 8.2.10) but it is limited to:

- six units per acre, and
- two units per building (although the Commission may allow up to 10 units per building for buildings built before 2006).

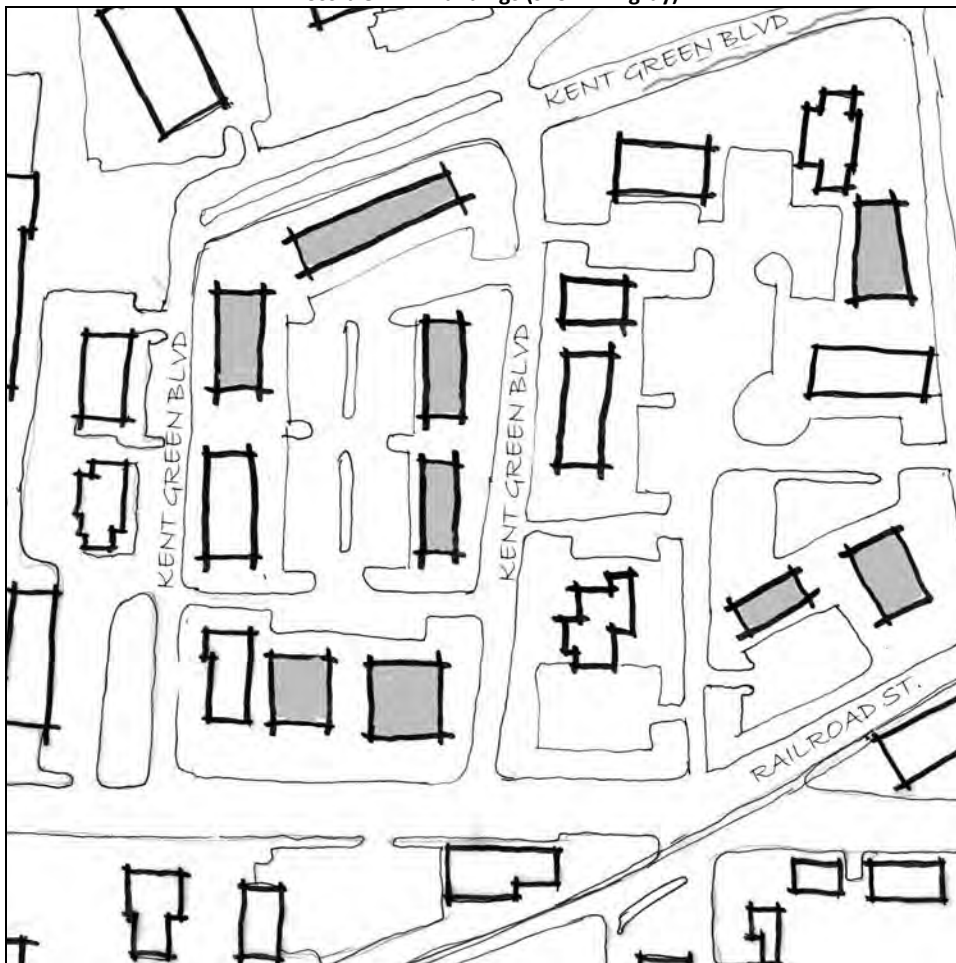
By encouraging additional residential construction, the vibrancy of this area will be enhanced and the residents will help support local businesses both in terms of being customers and potential employees. The availability of housing will also help provide for housing options for the community.



Aerial Photograph



Possible Infill Buildings (shown in gray)



Existing Buildings (1.5 Story)



Possible Future Building (2.5 Story)



2.5 Story Building



3.5 Story Building



The Study Committee evaluated two potential regulations for the “mixed use area”:

1. One fully compliant with State criteria for an incentive housing zone.
2. One allowing / encouraging affordable housing but having some variations from State aspirations.

After considering both options, the Study Committee endorsed the second option for the “mixed use area.” A potential regulation reflecting this approach for the “mixed use area” is presented on the following pages.

A “State compliant” regulation for the “mixed use area” (which was also considered) is in the Appendix.

Policy Recommendations

1. Encourage the establishment of mixed use housing by increasing the allowable density per acre and per building **provided that affordable units are established.**
2. Encourage the development of new buildings (infill buildings) and the redevelopment of existing buildings to increase overall intensity and to accommodate mixed use housing.
3. Encourage the creation of “walking streets” with active uses at “street level.”
4. Recommend the Planning and Zoning Commission adopt the “Village Mixed Use Overlay” regulation for the area shown on the map on page 4 of this report.

Village Feel



Walking Streets



Codification Note

This draft Regulation has been codified as a new Section of the Kent Zoning Regulations based on the organization of the Regulations at the time the report was completed.

However, the Planning and Zoning Commission is in the process of updating the Zoning Regulations with a new organization. This language could also be included in the updated Regulations as part of Section 5000 – Special Districts) with updated cross-references to other sections of the regulations.

Section 8A Village Mixed Use Overlay

8A.1 Purpose

The purpose of the Village Mixed Use Overlay District as delineated on the Zoning Map is to encourage the development of mixed-use buildings including affordable housing units within a portion of the Kent village area.

As an overlay district, a property owner may choose to utilize the provisions of the underlying zone or utilize the provisions of the overlay zone.

8A.2 Permitted Uses - The following uses shall be permitted subject to Special Permit approval in accordance with Section 4.9 and other applicable provisions of these Regulations:

1. Mixed residential and commercial use within the same building at a maximum dwelling density of twelve (12) units per acre provided that:
 - a. The first floor shall be limited to business or service use as permitted in the underlying zoning district.
 - b. At least twenty percent (20%) of the dwelling units will be conveyed subject to an incentive housing restriction requiring that, for at least thirty years after the initial occupancy of the development, such dwelling units shall be sold or rented at, or below, prices which will preserve the units as housing for which persons pay thirty per cent or less of their annual income, where such income is less than or equal to eighty per cent or less of the area median income as reported by the United States Department of Housing and Urban Development.
 - c. New uses or habitable structures shall be permitted only if supplied with public water and served by a sanitary sewer system or other sewage disposal system approved by the State Department of Energy and Environmental Protection (DEEP).

8A.3. Permitted Accessory Buildings, Structures And Uses.

1. Any accessory buildings, structures or uses, customarily incidental and directly related to the operation of the permitted, principal use.
2. Signs, in accordance with Section 19.

(continued on next page)

(continued from previous page)

8A.4. Special Provisions.

1. No development shall contain more than an average of two (2) bedrooms per unit and a studio unit shall count as a one-bedroom unit. The distribution of bedrooms between market rate units and deed-restricted units shall be similar.
2. Within the Village Mixed Use Overlay District, the Area and Dimensional Requirements in Section 5.5 shall continue to apply except as modified below:

Maximum Building Coverage

• Principal Building(s)	45%
• Principal w/Accessory Buildings	50%

Maximum Building Height

• Stories	2.5 stories
• Height	35 feet

3. The limitation on the size of a structure as contained in Section 8.4.2 and/or 8.2.14 shall not apply.
4. Off street parking and loading shall be provided in accordance with Section 18 except that the parking standards for mixed residential and commercial use within the same building shall be as follows:

**Minimum Number Of
Spaces Required**

Multi-family dwellings	1.5 spaces per dwelling unit
Any business use allowed in the underlying district	1 space per 250 SF of gross floor area

5. All development activities shall be subject to design review in accordance with the provisions of Section 5A of these Regulations (Kent Village District).
6. An “affordability plan” meeting the requirements of the Connecticut Department of Housing and in accordance with CGS Section 8-30g(b) shall be submitted with any application under this Section. The administrator of the affordability plan shall be a third party entity proposed by the applicant provided such party is acceptable to the Commission.
7. Affordable units shall have the same finishes and specifications as market rate units and shall be spread throughout the development in an equitable fashion.

Bedroom Limitation

This regulation has been drafted on the basis of an average number of bedrooms per unit.

If a development were to propose eight (8) units, this regulation would limit the development to 16 total bedrooms. The applicant could choose to configure the units any way they wished provided there were no more than 16 bedrooms.

The regulation could also be crafted as a limitation on the maximum number of bedrooms per unit.

Field Area

Considerations

The “Field Area” (approximately 8.64 acres) is undeveloped. This area is also zoned Village Center Commercial.

Single-family or two-family dwellings are allowed in the Village Center Commercial district subject to Site Plan Approval. The area and dimensional requirements in the Village Center Commercial district require:

- 10,000 square foot lots or larger
- Yard setbacks of at least 25 feet on the front, 15 feet on the side, and 40 feet in the rear.

For the foreseeable future, the “Field Area” is considered to have more potential for residential development as opposed to business development. This evaluation is based on the fact that floor space is already available for business use in other parts of the village center area.

By encouraging residential construction, the overall vibrancy of the village center will be enhanced. The availability of housing will help provide housing options for the community and the residents will help support local businesses.

Aerial Photograph



A separate engineering report regarding drainage, road, water, and sewer feasibility in the “Field” area was prepared for the Town of Kent by Anchor Engineering. That report is contained in the Appendix.

Drainage / Wetland Considerations - Drainage in the “Field” area is an issue that will need to be addressed as part of any development. There is no comprehensive drainage system in this part of the Kent village area and each site must make arrangements to provide for drainage.

At the present time, there is a drainage swale in the middle of the field directing drainage from the “Mixed Use” area southward towards Maple Street Extension. At places, the flow line of the elevated swale is above the surrounding elevation of the field and the banks of the swale are several feet above that.

The reasons for this drainage swale are illustrative of the drainage issues. Overall, the landform in the Kent village area is such that water generally drains in a westerly direction from the hillsides towards Route 7 and the Housatonic River. However, the railroad embankment on the west side of the field interrupts the natural drainage flow towards the west and water seeks an outlet.

However, the only drainage outlet (located at the south end of the property) is higher than the surrounding grade.

Drainage

Over the long term, it may make sense for the Town to install an overall drainage system in the Kent village area.

This could be configured to:

- transport drainage through the village area to a positive outlet at the river (a piped system), and/or
- coordinate infiltration and detention around the village area (a “low impact development” or “green infrastructure” approach).

Drainage Swale (looking south from Kent Green Boulevard)



Aerial view of Drainage Swale (showing elevated swale and outlet location)



USGS mapping created from aerial photographs in the 1940s shows ponded water in the southwest corner of the field. As a result, this part of the field showed up in the Litchfield County Soil Survey as an area of ponded water and from there to the Inland Wetlands and Watercourses map of the Town of Kent.

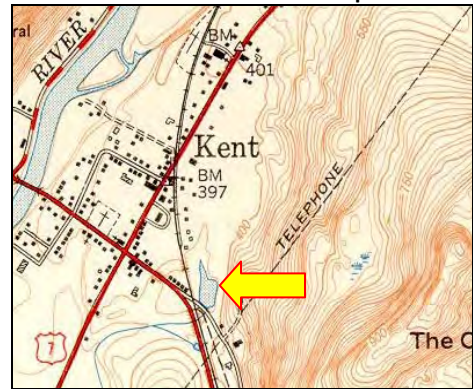
While a preliminary soils investigation by the Northwest Conservation District did not identify a “wetland” soil type in this area, this will merit further investigation as part of any development proposal. It is possible that this area is not a “regulated area” under the jurisdiction of the Inland Wetlands Commission.

The recommended approach will be to create an infiltration / detention system along the railroad embankment towards the drainage outlet. The grading of the road and lots (and the invert elevations of pipes connecting drywells) will need to be carefully coordinated to provide a well-functioning drainage system.

1934 Aerial Photo



Pond On 1944 USGS Map



Proposed Drainage Approach



Roadway Considerations - Traffic circulation is also an important consideration with regard to development in the field. There is a desire in the community to provide alternative access to the village business areas from Route 341 so that traffic from eastern Kent does not have to travel on Route 7 to get to Town Hall, the Post Office, the supermarket, or the other business areas.

Since it will not be possible to connect directly to Route 341 (due to the elevation and proximity of the railroad embankment), any roadway through the field would connect to Maple Street extension.

The concept of a dead-end street (accessed from the business area or from Maple Street Extension) was discussed as part of this study but it was felt that a roadway connection was a more desirable outcome.

If it is possible to connect this roadway to Route 7 in one or more places to create more of an interconnected street system for vehicles and pedestrians, this will help reinforce the overall circulation system in the village area.



Alternative Development Concepts

Some alternative development concepts are illustrated on the following pages:

- Single family development
- Duplex development
- Other development (common interest, mixed lot size)

Single Family Development Option

Baseline Development

- Based on current VC zoning
 - 10,000 SF lots
 - 80 feet of frontage
- 20 lots possible
- Site = 8.64 acres
- Open Space Area = 2.4 acres +/-
- Dev. Area = 6.2 acres
- Net Density = 3.2 units/acre
- Does not achieve CT desired density of 6 units/acre
- Affordable housing set-aside could be required (4 lots)
- No density increment over current zoning

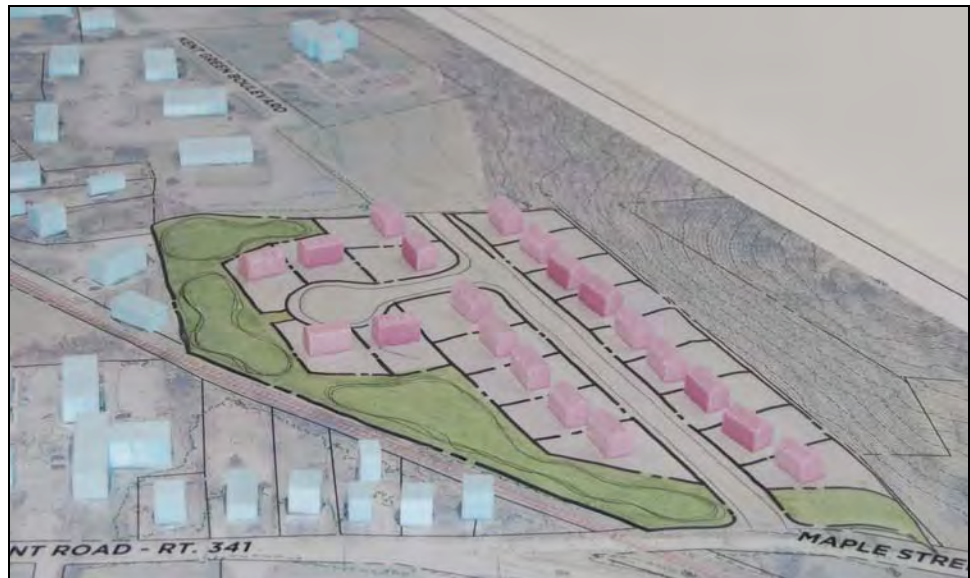
(Not Compliant With State Goals)

Plan View



This is what is permitted under the current VC Zoning for single family dwellings

Model



Single Family Development Option

7,500 SF Lots

(Not Compliant With State Goals)

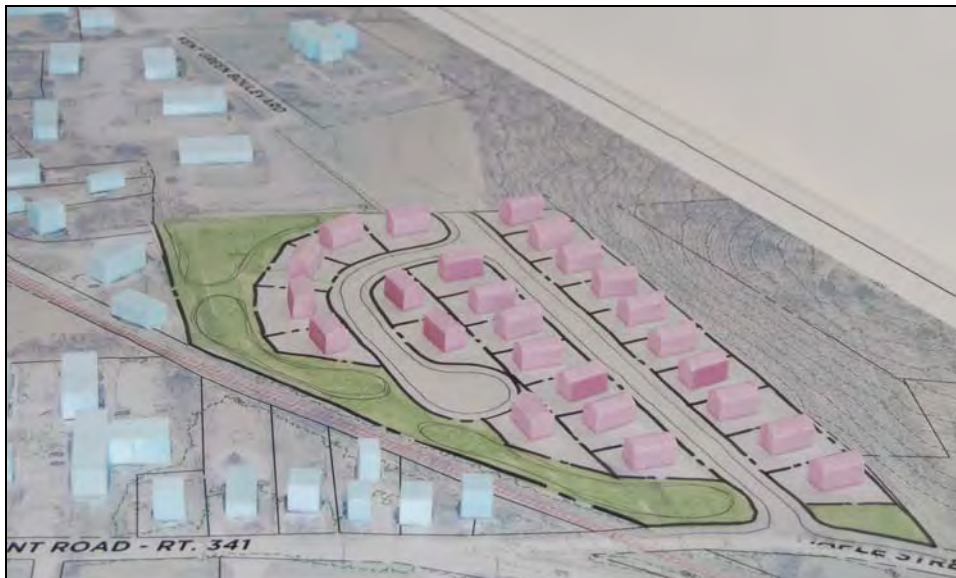
- New zoning
 - 7,500 SF lots
 - 75 feet of frontage
- 25% density increment over current zoning
- 25 lots possible
- Site = 8.64 acres
- Open Space Area = 2.2 acres +/-
- Dev. Area = 6.4 acres
- Net Density = 3.9 units/acre
- Does not achieve CT desired density of 6 units/acre
- Affordable housing set-aside could be required (5 units)

Plan View



This is a 25% increase over current density in the VC zone

Model



Subdivision Affordability

There could be a couple of ways to ensure that affordable housing gets created as part of a subdivision development:

- Ensure pro rata completion of affordable units through issuance of “certificates of occupancy” (works best when one developer is building all units)
- Deed some lots to an affordable housing organization so that they can create affordable units
- Require payment of a fee-in-lieu-of affordable housing to fund the creation of affordable units
- Require posting of a financial guaranty (bond or other surety) to guarantee creation of affordable units within a defined time frame

Single Family Development Option

5,000 SF Lots

- New zoning
 - 5,000 SF lots
 - 50 feet of frontage
- **25% density increment over current zoning**
- 37 lots possible
- Site = 8.64 acres
- Open Space Area = 2.4 acres +/-
- Dev. Area = 6.2 acres
- Net Density = 5.9 units/acre
- **Could be configured to achieve CT desired density-of 6 units/acre -**
- **Affordable housing set-aside could be required (8 units)**

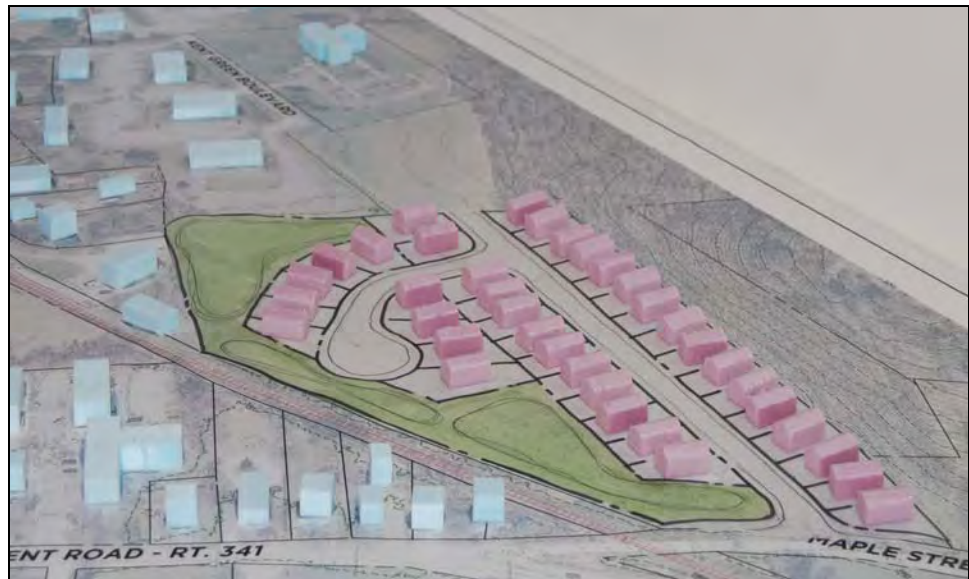
(Could Be Compliant With State Goals)

Plan View



This is the target IHOZ density for single family development

Model



Duplex Development Option

Baseline Duplex Dev.

- Based on current VC zoning
 - 10,000 SF lots
 - 80 feet of frontage required (125 feet shown)
- 19 lots / 38 units possible
- Site = 8.64 acres
- Open Space Area = 2.4 acres +/-
- Dev. Area = 6.2 acres
- Net Density = 6.0 units/acre
- **Does not achieve CT desired density of 10 units/acre**
- **No density increment over current zoning**
- **Affordable housing set-aside could be required (8 units)**

(Not Compliant With State Goals)

Plan View



This is what is permitted under the current VC Zoning for duplex dwellings

Model



Duplex Development Option

6,000 Duplex Lots

- New zoning
 - 6,000 SF lots
 - 60 feet of frontage
- **25% density increment over current zoning**
- 32 lots / 64 units possible
- Site = 8.64 acres
- Open Space Area = 2.0 acres +/-
- Dev. Area = 6.6 acres
- Net Density = 9.6 units/acre
- **Could be configured to achieve CT desired density-of 10 units/acre**
- **Affordable housing set-aside could be required (13 units)**

(Could Be Compliant With State Goals)

Plan View



This is the target IHOZ density for duplex dwellings

Model



Other Development Approach

Common Interest

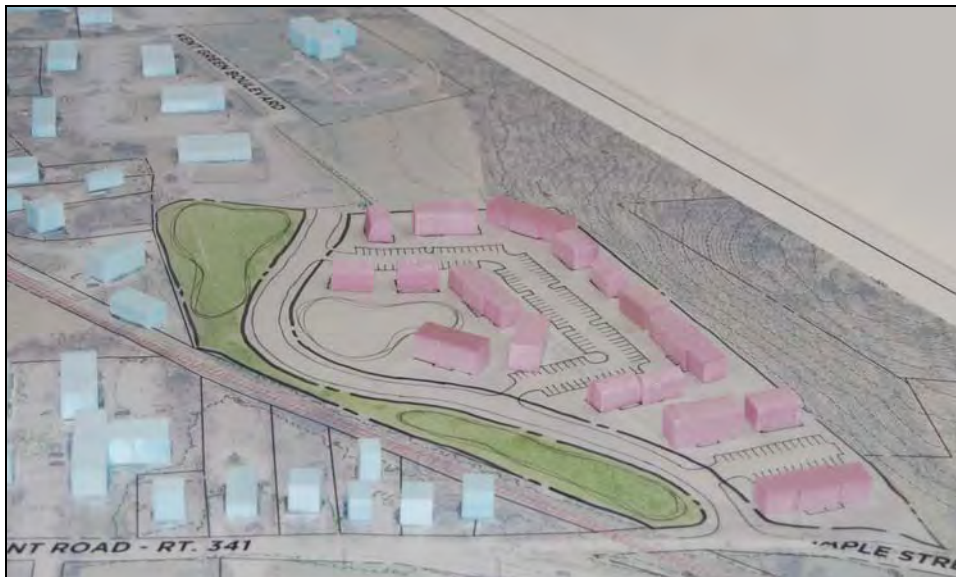
- Mix of attached / detached units on common land
- 62 units possible
 - 6 duplex units (3 buildings)
 - 12 tri-plex units (4 buildings)
 - 20 four-plex units (5 buildings)
 - 24 six-plex units (4 buildings)
- **25% density increment over current zoning**
- Site = 8.64 acres
- Open Space Area = 2.4 acres +/-
- Dev. Area = 6.2 acres
- Net Density = 10.0 units/acre
- **Does not achieve CT desired density of 20 units/acre**
- **Affordable housing set-aside could be required (13 units)**

(Not Compliant With State Goals)

Plan View



Model



Note

The “plan views” on this page are illustrations of possible configurations and are not intended to limit or exclude other possible configurations provided a connection between Maple Street Extension and the Kent Village area is accomplished.

Other Development Approach

Mixed Lot Size

- Mix of lot sizes
 - 7,500 SF lots for market rate units
 - 5,000 SF lots for price-restricted units
- 25-27 lots possible
- **25% density increment over current zoning**
- Site = 8.64 acres
- Open Space Area = 2.2 to 2.4 acres +/-
- Dev. Area = 6.2 to 6.4 acres
- Net Density = 4.0 units/acre
- **Does not achieve CT desired density of 6 units/acre**
- **Affordable housing set-aside could be required (6 units)**

(Not Compliant With State Goals)

Plan View



The Incentive Housing Study Committee felt that this “mixed lot size” approach might better reflect the development patterns that already exist in the Kent village area.

The Study Committee evaluated two potential regulations for the “field area”:

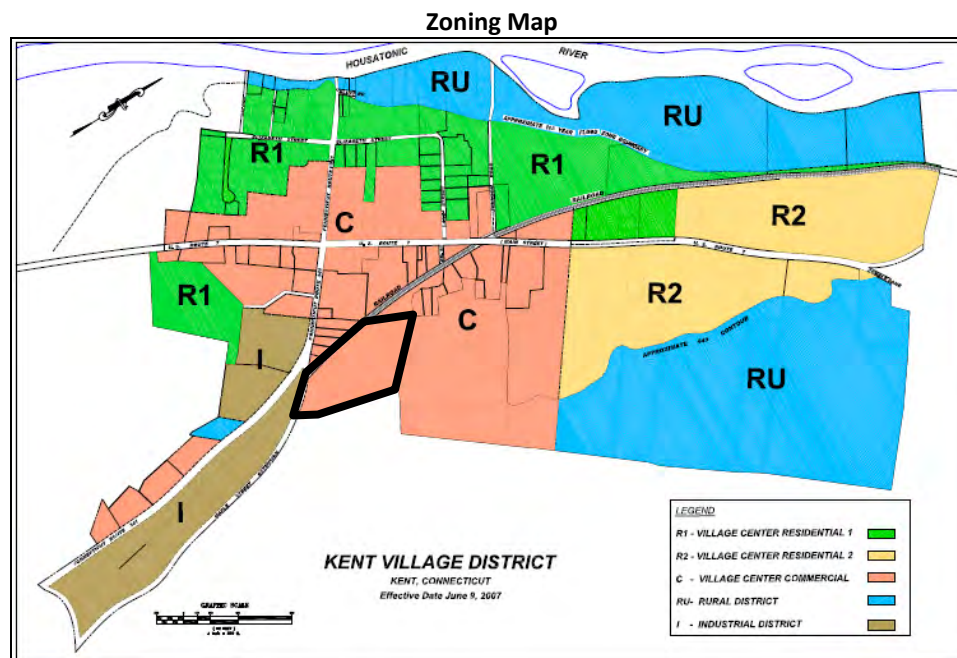
1. One fully compliant with State criteria for an incentive housing zone.
2. One encouraging / requiring affordable housing but having some variations from State aspirations.

After considering both options, the Study Committee endorsed the second option for the “field area.” A potential regulation reflecting this approach is presented on the following pages.

A “State compliant” regulation for the “field area” (which was also considered) is in the Appendix.

Policy Recommendations

1. **Require** the development of incentive housing in the “Field” area by establishing a minimum residential density and increasing the allowable density per acre **provided that affordable units are established.**
2. Address drainage / wetland issues both in the field and in other parts of the village area.
3. Provide for a roadway connection from the village business area to Maple Street Extension.
4. Recommend the Planning and Zoning Commission adopt the “Village Incentive Housing Overlay” regulation for the area shown on the map below.



Codification Note

This draft Regulation has been codified as a new Section of the Kent Zoning Regulations based on the organization of the Regulations at the time the report was completed.

However, the Planning and Zoning Commission is in the process of updating the Zoning Regulations with a new organization. This language could also be included in the updated Regulations as part of Section 5000 – Special Districts) with updated cross-references to other sections of the regulations.

Alternatively, a new zoning district could be created (perhaps called Village Residential 3 (VR-3)) and these standards could be written into that section. In that situation, the overlay zone approach would not be needed.

Subdivision Option

The subdivision option does not have to be made available. The Planning and Zoning Commission could only allow such development as part of common interest ownership community.

Section 8B Village Incentive Housing Overlay

8B.1 Purpose

The purpose of the Village Incentive Housing Overlay District as delineated on the Zoning Map is to encourage the development of housing including affordable housing units within a portion of the Kent village area.

This overlay zone applies to any development in the underlying zoning district.

8B.2 Permitted Uses – The following uses shall be permitted subject to Special Permit approval in accordance with Section 4.9 and other applicable provisions of these Regulations:

1. Single family detached dwellings on individual lots are permitted subject to the following:

Minimum Lot Area Per Unit (if a market rate unit)	7,500 SF
Minimum Lot Area Per Unit (if an affordable unit)	5,000 SF
Minimum Lot Width (if a market rate unit)	75 feet
Minimum Lot Width (if an affordable unit)	50 feet
Minimum Front Yard Setback	20 feet
Minimum Side Yard Setback	8 feet
Minimum Rear Yard Setback	30 feet

2. Single family detached dwellings and/or multi-unit buildings on common land are permitted subject to the following:

Maximum Density	4 units per gross acre
Minimum Building Setback From A Public Street	20 feet
Minimum Building Separation	20 feet (or the height of the building, whichever is greater)
Minimum Perimeter Building Setback	30 feet

(continued on next page)

(continued from previous page)

3. The above uses shall be permitted subject to:
 - a. site plan approval in accordance with Sections 4.3 through 4.8 and other applicable provisions of these Regulations (if a common interest community), or
 - b. subdivision approval in accordance with this Section of the Regulations and the Kent Subdivision Regulations (if separate lots are to be created and arrangements acceptable to the Commission are made to ensure the actual construction of the affordable units).
4. All development under this Section shall comply with the following:
 - a. At least twenty percent (20%) of the dwelling units will be conveyed subject to an incentive housing restriction requiring that, for at least thirty years after the initial occupancy of the development, such dwelling units shall be sold or rented at, or below, prices which will preserve the units as housing for which persons pay thirty per cent or less of their annual income, where such income is less than or equal to eighty per cent or less of the area median income as reported by the United States Department of Housing and Urban Development.
 - b. New uses or habitable structures shall be permitted only if supplied with public water and served by a sanitary sewer system or other sewage disposal system approved by the State Department of Energy and Environmental Protection (DEEP).
 - c. A roadway connection in a configuration acceptable to the Commission is made from the village business area to Maple Street Extension.

8B.3. Permitted Accessory Buildings, Structures And Uses.

1. Any accessory buildings, structures or uses, customarily incidental and directly related to the operation of the permitted, principal use.
1. Off street parking and loading shall be provided in accordance with Section 18.
2. Signs, in accordance with Section 19.

8B.4. Special Provisions.

1. Unless the applicant demonstrates that such density of development is not feasible or desirable due to the physical characteristics of the property, **the minimum residential density shall be three units per acre.**
2. At least twenty percent (20%) of the area of the parcel shall be set aside as open space/drainage area in order to facilitate the infiltration of runoff and drainage from the site and areas upstream.

(continued on next page)

(continued from previous page)

3. All development activities shall be subject to design review in accordance with the provisions of Section 5A of these Regulations (Kent Village District).
4. The design of the affordable units (including the basic finishes, appliances, HVAC equipment, and other specifications) shall be approved by the Commission.
5. An “affordability plan” meeting the requirements of the Connecticut Department of Housing and in accordance with CGS Section 8-30g(b) shall be submitted with any application under this Section. The administrator of the affordability plan shall be a third party entity proposed by the applicant provided such party is acceptable to the Commission.
6. In the case of a common interest community, a certificate of zoning compliance precedent to issuance of a certificate of occupancy shall not be issued for a market rate unit if doing so would cause there to be more than three market rate units completed for each affordable unit completed. Affordable units shall have the same basic finishes and specifications as market rate units and shall be spread throughout the development in an equitable fashion.
7. In the case of a subdivision, the applicant shall demonstrate a methodology acceptable to the Commission whereby the affordable housing units will be constructed on a “pro rata” basis such that there will not, at any time, be more than three market rate units for each affordable unit. Such methodologies may include, but are not limited to:
 - a. The developer will build all the units and take responsibility for the “pro rata” approach where there will not be more than three market rate units completed for each affordable unit completed,
 - b. Provision of a financial guarantee in a form and amount acceptable to the Commission providing for the actual construction of the affordable housing units and associated improvements (full construction cost rather than estimated sales price) proposed by the developer in order to utilize the higher density allowed by this Section of the Zoning Regulations, or
 - c. Other approach acceptable to the Commission to ensure the actual construction and occupancy of the affordable units within a defined time frame.

Summary

Regulation options for the “Mixed-Use area” and the “Field area” have been prepared for review and consideration by the Town. It is anticipated that the Incentive Housing Study Committee will make a recommendation to the Planning and Zoning Commission for consideration.

While property owners may wish to propose these regulation for other areas in Kent, this report only recommends these regulations for the areas shown in Kent Village due to:

- **The availability of water and sewer service to accommodate the anticipated number of units.**
- **The ability of the Kent Village area to accommodate the potential building bulk and density.**
- **The desire to support and strengthen the Kent Village business area.**

Addendum

Michael Everett, a member of the Incentive Housing Zone Study Committee and an accomplished land planner, prepared some supplemental materials to help illustrate concepts related to development in the “field” area. This material was not completed at the time the original report was finalized and was subsequently added to the report.

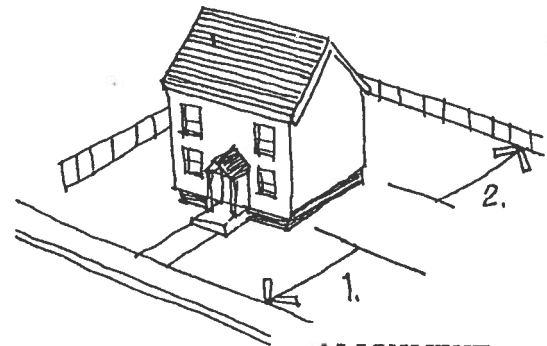
KENT

Incentive Housing Zone Report ADDENDUM

INTENTION

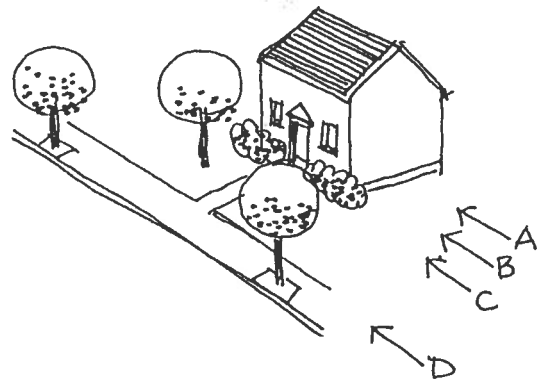
The following comments and illustrations are intended to augment the fine report prepared by Planimetrics. The intention is to test selected design ideas and see how they are in line with the report and suggest alternate options the Planning & Zoning Commission might consider. The general theme is to incorporate ideas about rural and small town character retention that allowing for needed new development. These so called Creative Planning ideas have been around since the 1970's - '80's and many of the illustrations used herein date from old studies from then.

The following material generally follows the order of the parent report: Study Areas: Mixed Use and Field Areas with more attention given to the latter area.



ALIGNMENT

- 1. Building with street - Public or social area
- 2. private area.

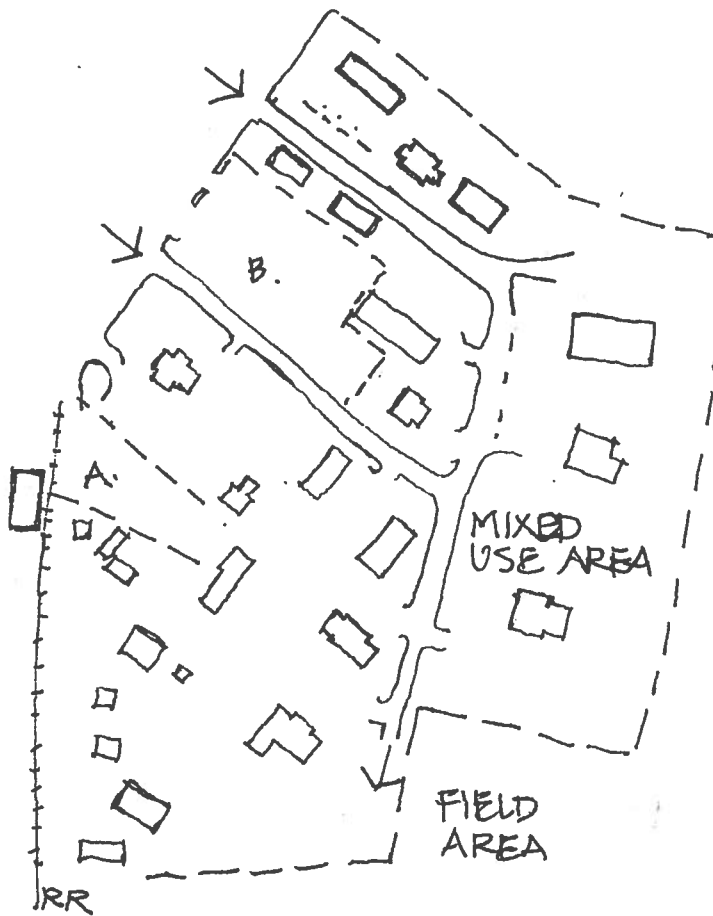


LAYERING

- A. Social status - Frontispiece
- B. Foundation planting
- C. Yard trees
- D. Street trees

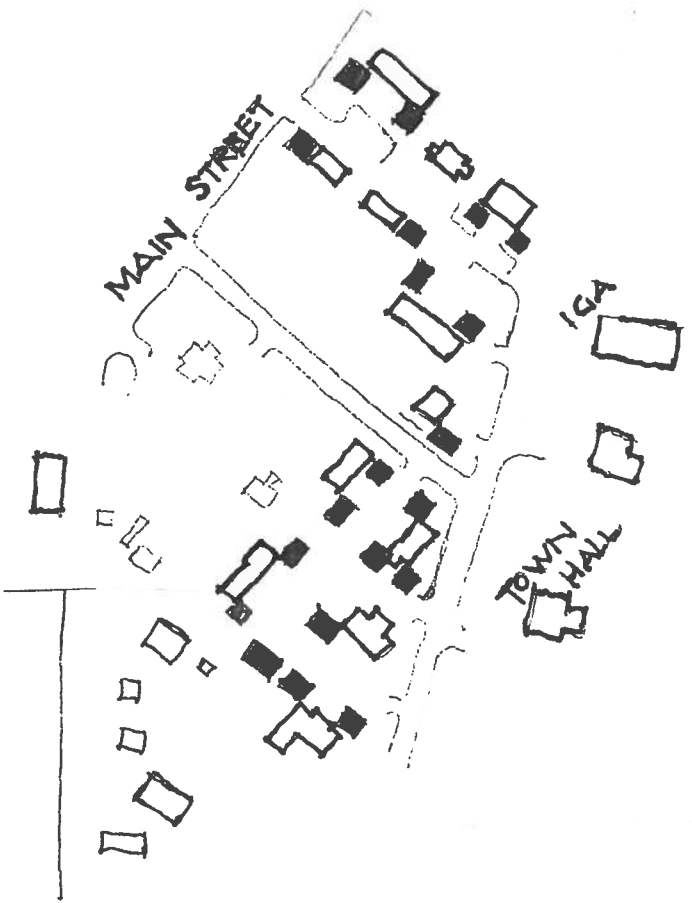
MIXED USE AREA

The sketch map used is not accurate as to the placement of existing buildings and includes two sites now under development – one for the Kent Visitor Center directly behind the Train Station building and the other as a mixed use site including a gallery. This last site extends from Main Street east to the hardware store. The sketch map is helpful in showing in-fill sites but does not indicate ways in which adjacent and/or attached additions can increase the village ambience by breaking up the block

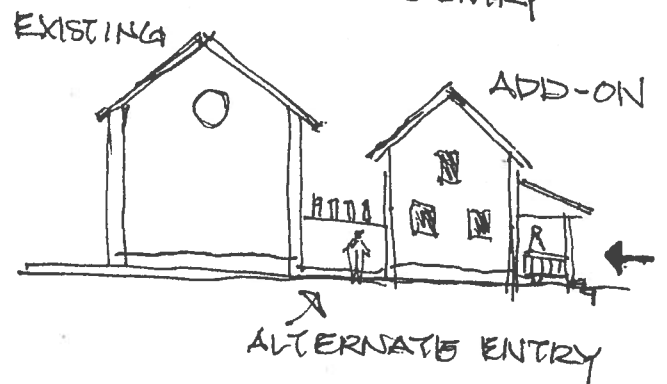


A. Kent Visitor Center

B. Development lot
(outside of study area)



Possible add-on units:
Work/live units or residential units



like nature of most of the buildings. Add-on right-angled extensions can break up the bulky look and close in areas that are ambiguous and too large. Reconfiguration of parking in smaller sections can help create a more intimate scale and create a more intricate configuring of stores, offices, work/live units and efficiency units.

Also suggested is an indication of build-to lines to reinforce street alignments and to guide placement of in-fill units and add-ons.. The entire Mixed Use Area has a suburban look. Prudent additions, connectors, smaller articulated parking areas and small trees would change this characterization.

Any plan to increase density and diversity that allows new uses should be matched by modest increases in streetscape amenities. Any incremental changes should conform to a set of articulated principles agreed to by the owner/developer and the Town. See diagrammatic illustration.

Add-ons

Apx. 20'x25' units

1st floor: shop or studio

2nd floor: efficiency apartment

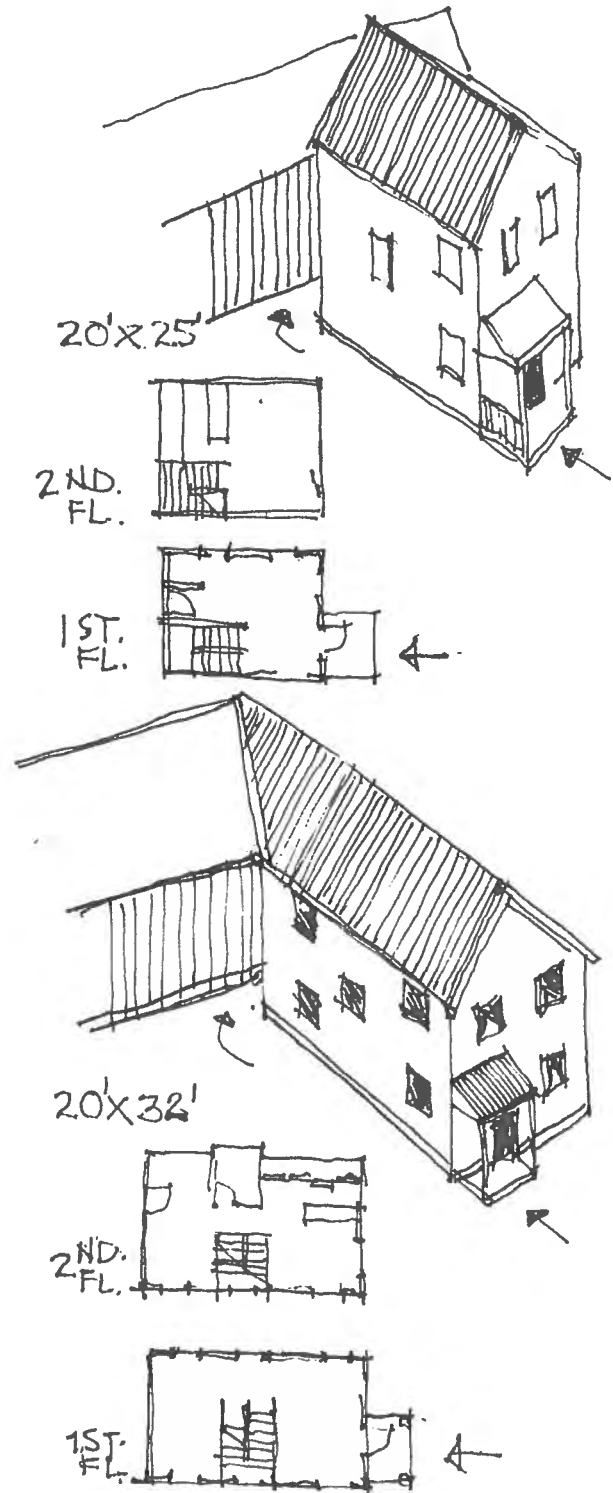
Apx. 20'x32' units

1st floor: workshop or store

2nd floor: one bedroom apartment

Add-ons

Placed adjacent to existing buildings with connecting roof or breezeway
Placement to create smaller parking areas and define the secondary road system

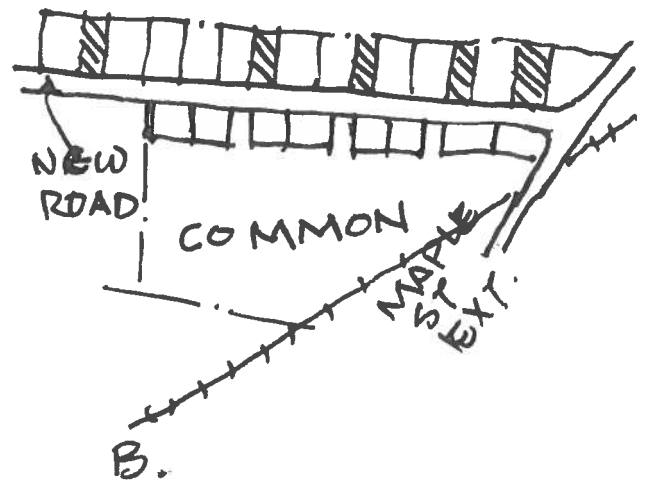
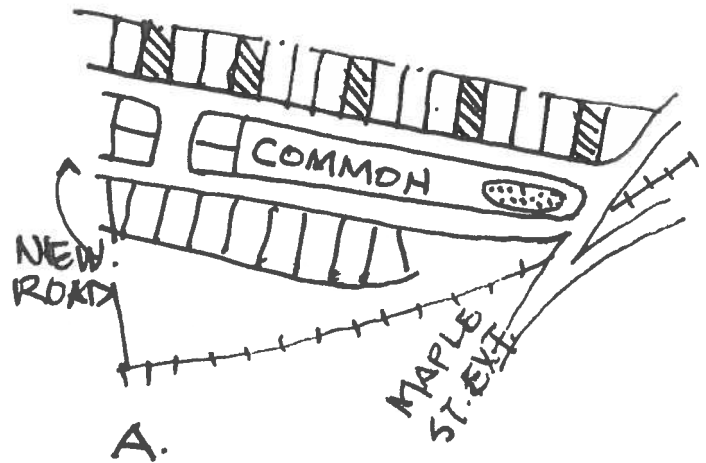


FIELD AREA

Of primary concern is the extent of the boundary shown. I acknowledge that what is shown is schematic but all too often the diagram becomes the prescribed boundary. The boundary should be extended up the lower slope from behind the pond and Town Hall all the way to Maple Street Extension. This inclusion encourages development up to and within the tree edge, allows for units on two or more levels, and avoids some or most of the level field drainage concerns. The placing of the majority of units within this tree edge area not only "visually absorbs" this new density and pattern but can be coupled with open space amenities that will benefit the entire village. This designated area should also come right up to the Town Hall parking lot.

The main road should be relatively straight as a continuation of the road that passes in front of Town Hall and then extends to connect with Maple Street Ext. Subordinate cul de sacs should be avoided, especially in the flat area.

The potential, if any, of the area behind Town Hall has not been explored but should be give IHZ consideration. Certainly the area south of Town Hall should be extended to include at least a hundred feet of land east of the existing drainage ditch.



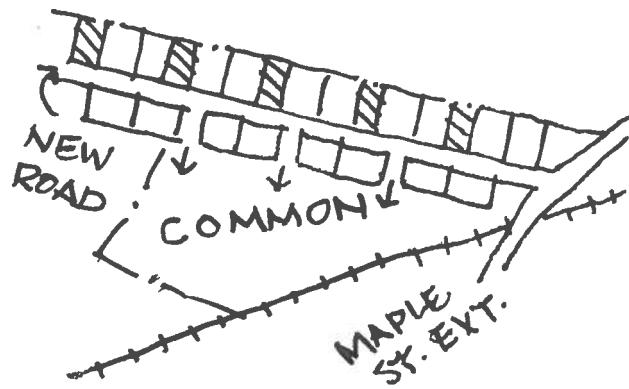
A. apx.16 lots placed against the treed slope

Apx.3-4 lots north of the new common

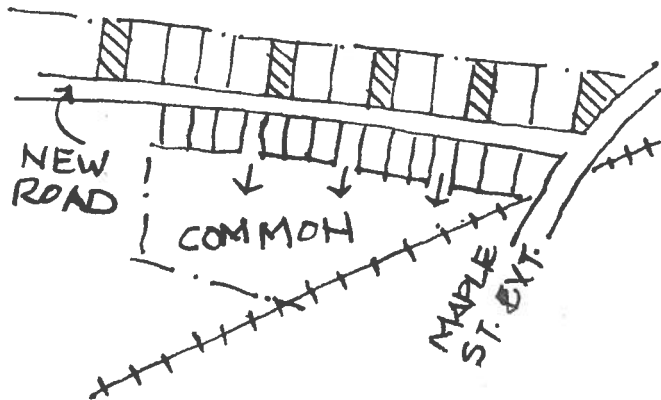
Apx. 8 lots to the west of the common

B. Mix of large lots w/ two houses on @ lot with 3-5 smaller lots

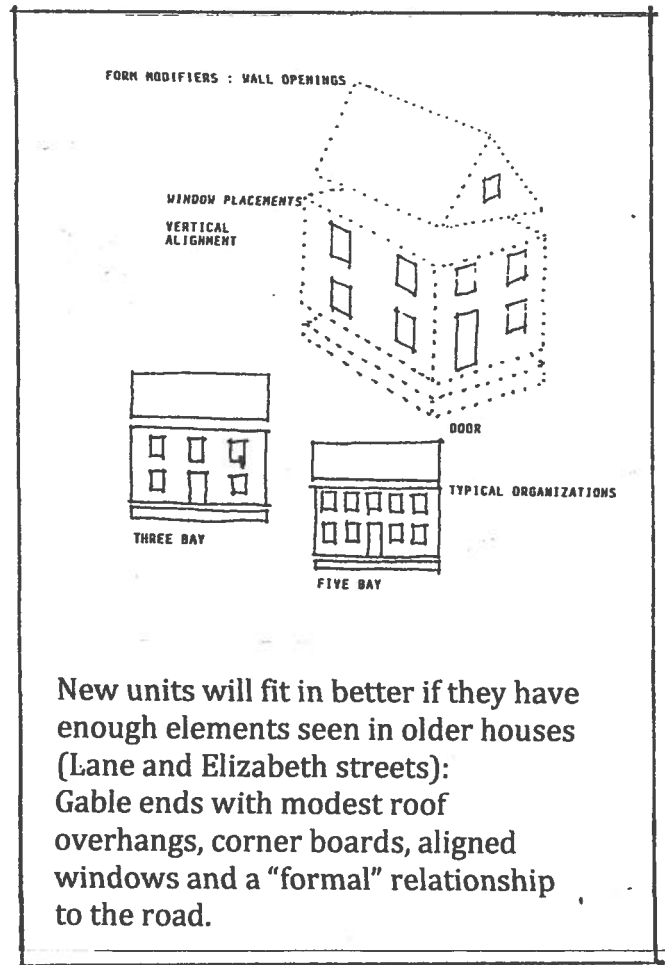
Apx. 12 - 16 duplex units



C.



D.



New units will fit in better if they have enough elements seen in older houses (Lane and Elizabeth streets): Gable ends with modest roof overhangs, corner boards, aligned windows and a "formal" relationship to the road.

C. Apx.8-10 large lots (two houses on each)

Apx 3-5 single family lots

Apx. 3-5 single family houses north of common

Apx. 12 -16 duplex units adjacent to the common

D. Mix of 8-10 large lots (two houses on each lot)

Apx. 3-5 single family lots

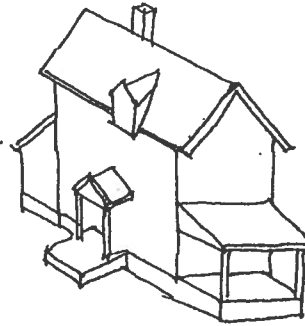
Apx.10 -12 single family lots

Adjacent to the common

Alternate Development Concepts

Single Family option:

What is shown are very conventional suburban appearing layouts that spread all units across almost all the site. The Town should encourage a scheme that trades smaller lots and edge development for "creative" open space designations: a Common, an ecological water garden (drainage) or other space suitable for communal activities. Cul de sacs in the open area should be avoided (banned?) with all streets connected at both ends where possible.



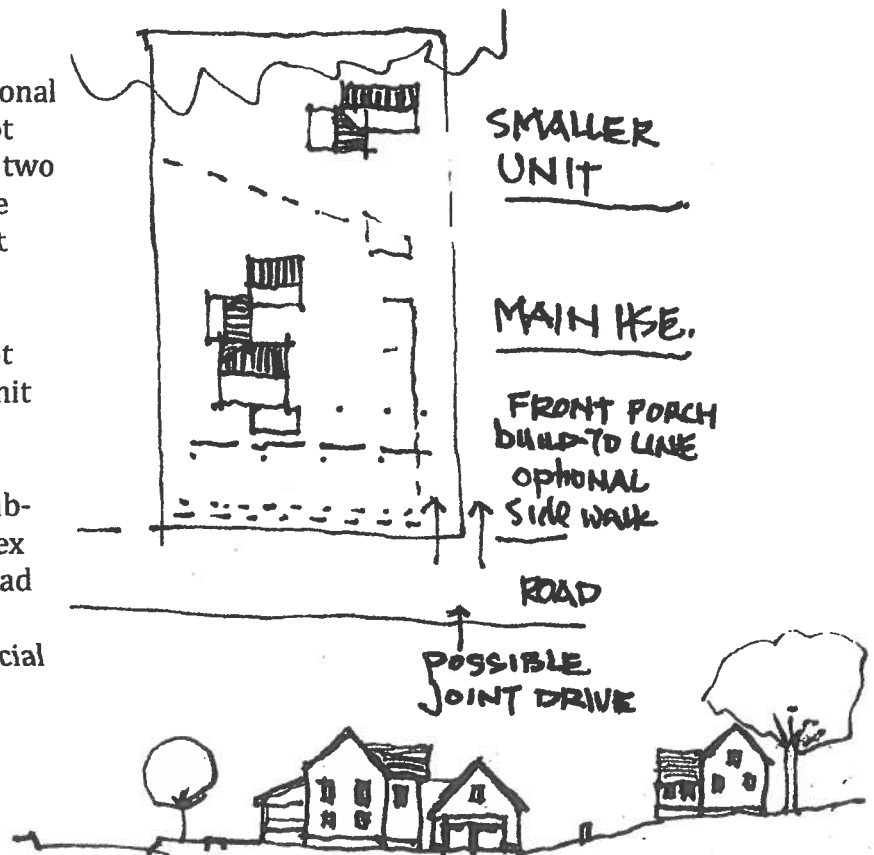
FORM MODIFIERS

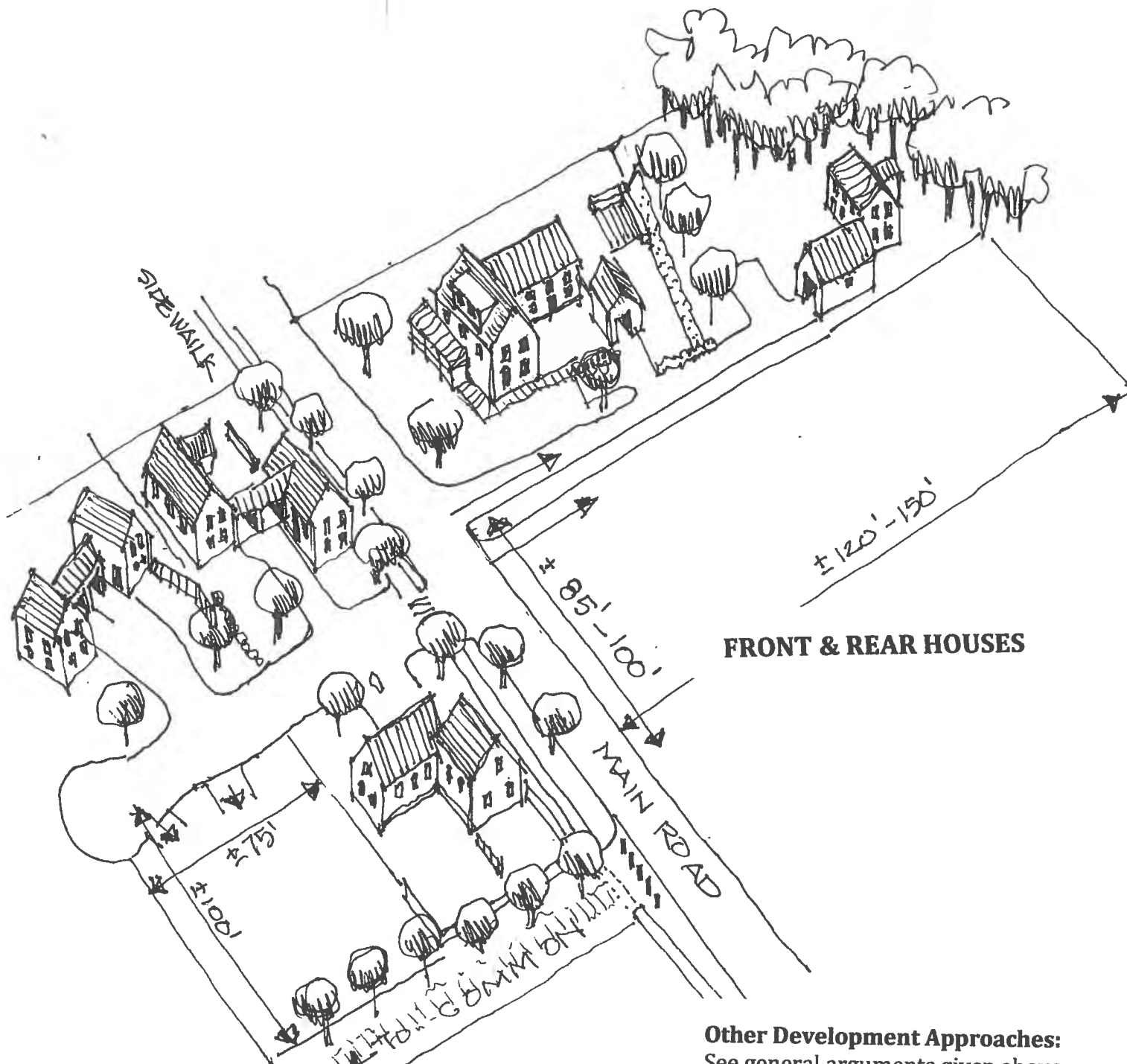
Duplex Development Options:

Again, the same site coverage concerns persist. There is a need to extend the lots to the trees. And pains should be taken to avoid an overall suburban look.

In addition a looser, less conventional interpretation of two units on a lot need to be explored. On large lots two or perhaps two plus a subordinate "mother-in-law" or work/live unit should be explored. Other possibilities are easement encouraging joint driveways (0 lot line), and design rules which permit front house, rear house layouts.

Another duplex alternate uses stub-end drives to access pairs of duplex units along the west side of the road and as transition behind the most southerly building of the commercial area.





STUB-END DUPLEXES

Public walkways from the new road to the common

FRONT & REAR HOUSES

Other Development Approaches:

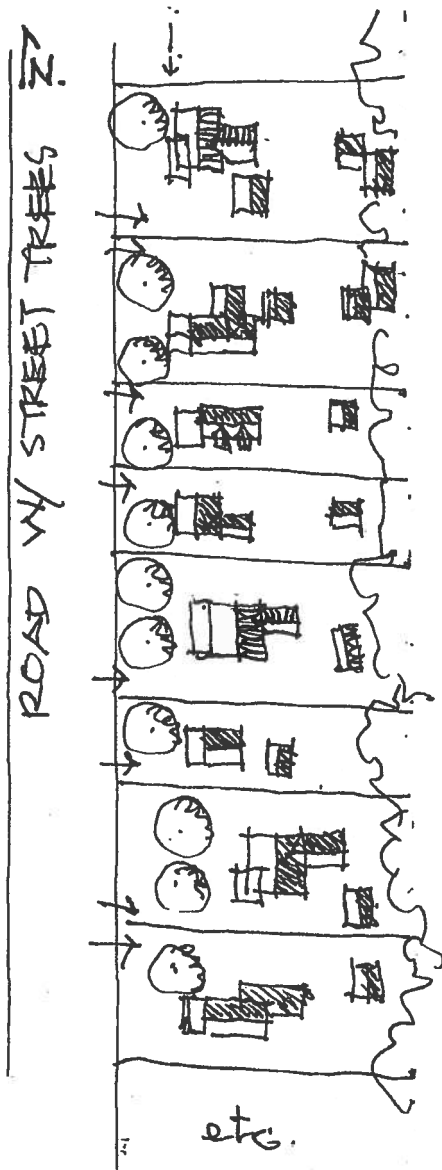
See general arguments given above. Certainly, any alternate ideas should begin with enhancing village character. An alternate concept is suggested to illustrate "creative development" principles:

This scheme puts the majority of the units on the hillside on large lots which allow one, two or more units and which must therefore conform to a set of performance "rules".

Other Development Approaches:

See general arguments given above. Certainly, any alternate ideas should begin with enhancing village character. An alternate concept is suggested to illustrate "creative development" principles:

This scheme puts the majority of the units on the hillside on large lots which allow one, two or more units and which must therefore conform to a set of performance "rules".



Large lots against the hill with two houses per lot: front larger, rear: smaller

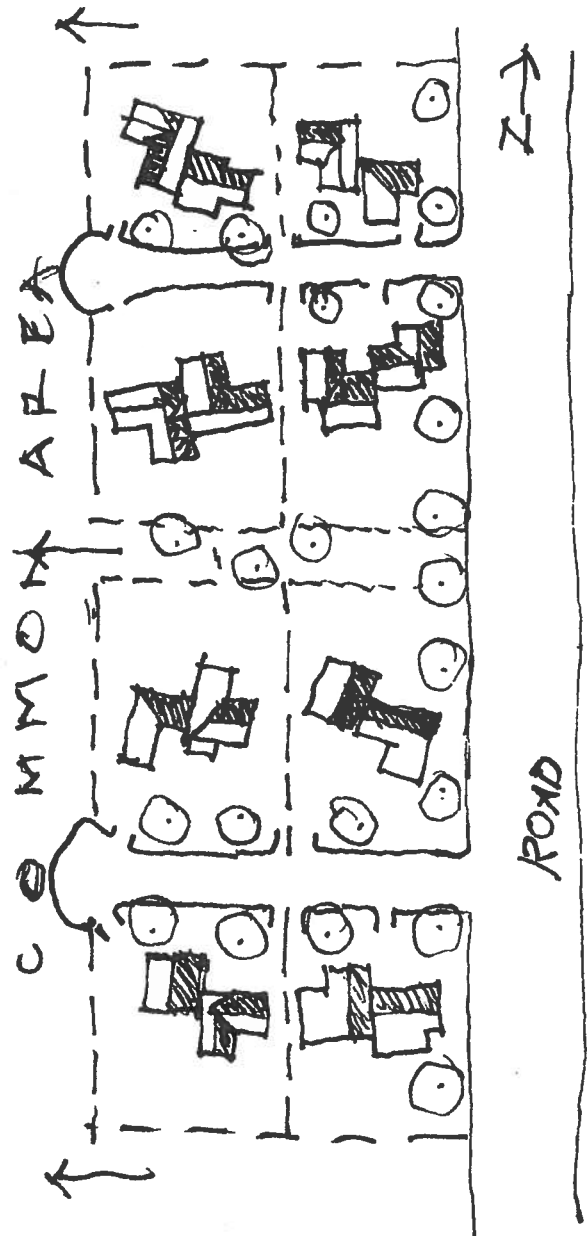


Diagram of stub-end drives with four duplex units alternating with broad access paths to the common

SUGGESTED SITE PLAN

Illustrated is a carefully considered sketch build-out showing a possible scheme for adding to and retaining Kent's village character. Proposed is a density and diversity of housing types appropriate to the two defined areas: Mixed Use Area and Field Area. Provision is made for down-sizing, affordable and larger units that are placed mainly to the east up against the wooded hillside and retaining the lower area to the west as a common, park retaining some of the meadow that also can aid drainage needs.

In the Mixed Use Area add-on units provide opportunity to live above the shop, have a studio, store or simply live in a small efficiency unit. In addition these add-ons help define the secondary road system that links all of the parking and also contains the parking in smaller, articulated areas.

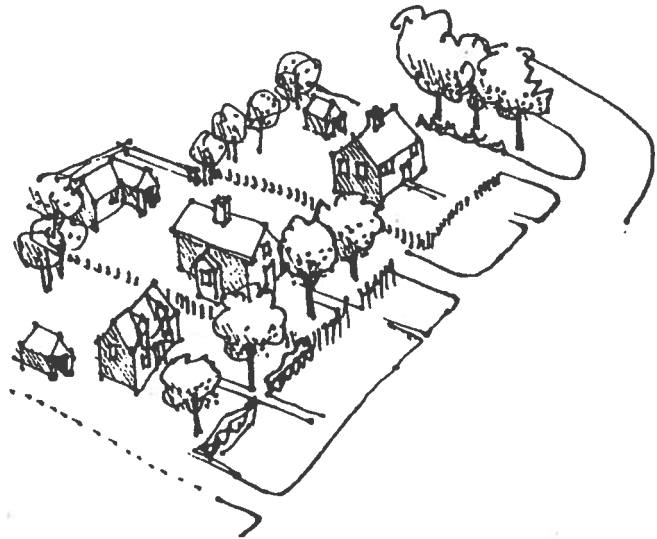
In the Field Area a mix of unit types allows for a disciplined development that encourages diversity of buildings that can be built gradually over time as need and financing are realized. The concentration of the layout against the hill places many of the houses on higher ground within or adjacent to the wooded hillside. And, this leaves the lower land, the meadow, to be retained as a common open space with easy access, small pond and a path system.

In reality, any development in this area will most likely be at a lower density with fewer units. All lots in the suggested site plan indicate a maximum build-out. To realize this density permission for this development must require that the

amenities suggested are part of the agreement. Incremental or phased development will need to buy into this or a similar overall scheme.

For clarity street trees are not shown but they are an essential component of any ideal scheme.

It is hoped that this exercise will stimulate interest in the needed new road and building of a new neighborhood or sector of the Village. We need more in-town housing units, we need more folks in Kent.



VILLAGE BUILDING:

- AMPLE DEEP LOTS
- WELL SETBACK
- LARGE TREES
- FENCE, HEDGE
- LAWN

MIXED USE AREA

FIELD AREA



INCENTIVE HOUSING STUDY:
SUGGESTED SITE PLAN

SUMMATION

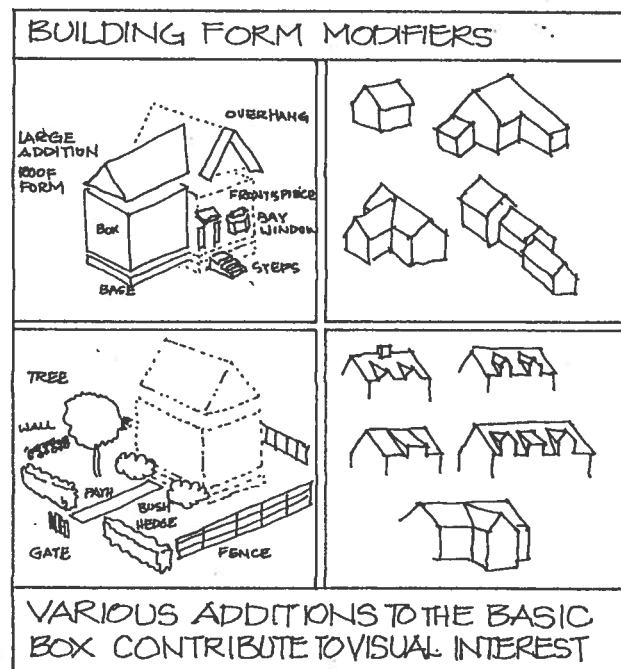
Central to this approach is the need for a negotiated development agreement that begins with mutually acceptable objectives and articulated trade-offs. The P & Z Comm. should entertain an approach that allows an owner/developer to propose a comprehensive set of civic and development goals.

This process can begin by using the armature of the IHZ overlay zone but should then consider trade-offs that make the development feasible by modest increases in unit numbers BUT also provide the Town with real significant benefits. The examples diagramed in the addendum try to illustrate other possibility based on selected design principles.

This quick response attempts to show a realistic and attractive schemes (not the same old), that avoid a suburban look, absorbs development by integrating it against the tree edge, avoids questionable environmental hurdles and instead provides positive ecological and real civic improvements.

Despite all our mutual good will and the general desire for the development of this site, as well as the need for modest population growth, and for down-sizing units --
IT WILL NOT BE EASY!
So we need to be flexible and innovative.

Michael Everett
September 2016



Appendix

Appendix items on the following pages include:

1. Report from Anchor Engineering.
2. Alternative State-compliant regulation for the “mixed use area” (not recommended by Study Committee).
3. Alternative State-compliant regulation for the “field area” (not recommended by Study Committee).



May 26, 2016

Ms. Donna M. Hayes, Land Use Administrator
Town of Kent
41 Kent Green Boulevard
Kent, CT 06757

Re: Kent Green Boulevard Extension - Conceptual Roadway Layout
Incentive Housing Zone

Dear Ms. Hayes:

Anchor Engineering Services has gathered existing information for the project area and created a conceptual layout of the extension of Kent Green Boulevard which is consistent with one of the subdivision alternatives for the adjacent property created by Planimetrics. We have included possible locations for sanitary sewer, water and storm drainage along the roadway alignment. The proposed concept is to construct the roadway extension in fill to provide adequate cover over proposed storm drainage and provide for an overflow from the system to the existing culvert at Maple Street Extension. The final grading at the site will be developed based on the proposed storm systems to be used and site testing to determine the soil and groundwater conditions.

The Kent Green Boulevard extension is proposed to connect to Maple Street Extension approximately seventy-five feet east of its at grade railroad crossing. This location will provide adequate sight distance for the intersection. The following provides information about the proposed storm drainage and utilities for the roadway to serve the adjacent properties:

Storm Drainage

There is an existing grassed swale that starts approximately 700 feet north of the proposed Kent Green Boulevard extension along the west side of the road. It continues through the site for an additional 1,150 feet to an existing 36" diameter cmp culvert which drains under Maple Street Extension. This swale only pitches approximately 1.5 feet over the 1,150 feet included within the project area. This swale collects any overland flow that drains directly to it. The remainder of the stormwater on the adjacent developments is collected with catch basins and uses drywells and other systems to infiltrate the stormwater.

The concept for the proposed storm drainage is to provide a detention area at the start of the existing swale and to eliminate the remainder of the swale. Storm drainage systems would be installed to collect the water from the roadway and infiltration systems and the detention area would be used to mitigate any increase in peak flows leaving the site due to the roadway and adjacent development. An overflow from

Ms. Donna M. Hayes
May 26, 2016

Page 2

the infiltration systems would be installed and connected to the existing culvert under Maple Street Extension.

It is anticipated that the adjacent future buildings would not have the ability for gravity flow footing drains, with or without basements. Also, connecting the roof drains to drywells in the developments could help to offset the size of infiltration required at the roadway storm drainage.

Sanitary Sewer

The proposed sanitary in the road extension is a force main that would be connected a proposed manhole at the existing sewer stub installed on the north side of Maple Street Extension. Due to the shallow depth of the sanitary that is available to the site, gravity sewer to service the adjacent property is not feasible. It is recommended that the future subdivision lots would each have an individual pump (i.e. E/One grinder pump) that can be installed in the yard or basement of a building. These pumps would connect to the force main installed within the roadway. If the future development includes a common ownership development, a single pump station can be installed to serve the site and connect to the force main installed with in the roadway.

The existing sanitary system to the north which serves the town hall is a private system, which is also fairly shallow, and uses a pump station that discharges to the sanitary sewer in Route 7.

Water

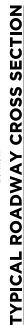
The proposed water main within the roadway extension is shown connecting to the existing 12" water main in Maple Street Extension. The existing water main that serves the developments to the north, including the town hall, is fed from the water main in Route 7. The end of this water main is a few hundred feet north of the start of the proposed roadway extension, therefore the concept plans and cost estimate include also connecting to this water main to create a looped system. Final design will be coordinated with Aquarion Water Company.

Enclosed is the conceptual roadway plan and cost estimate. If you have any questions regarding the above or the enclosed information, please don't hesitate to contact me at (860) 633-8770.

Sincerely,

A handwritten signature in blue ink that reads "Denise Pford". The signature is written in a cursive, flowing style.

Denise P. Lord, P.E.
Senior Civil Engineer



NOT TO SCALE

2002 COST PER AERIAL PER CONNECTICUT ENVIRONMENTAL CONDITIONS ONLINE (CITECO)
CONTIGUOUS SHOWN FROM 2009 NRCS LIDAR PER NOAA DIGITAL COAST DATA. ACCESS VARIING.
EXISTING UTILITY LOCATIONS ARE APPROXIMATE AND ARE SHOWN AS DEPicted ON AVAILABLE MAPPING.
A SANITARY FUTURE LOT WILL BE PROVIDED WITHIN THE KENT GREEN FUTURE LOT WILL INCLUDE INDIVIDUAL SANITARY PUMPS ON A COMMUNITY SANITARY PUMP SYSTEM DEPENDING ON THE TYPE OF THE REQUIRED PROPERTY.
THE REQUIRED PROPERTY IS NOT DIFFERENTIATED TO ANOTHER SYSTEM SHOWN ARE CONCEPTUAL. IT IS ANTICIPATED THAT THERE IS A HIGH POTENTIAL FOR STORMWATER INFILTRATION BASED ON EXISTING



SCALE: 1" = 40'

NOT RELEASED FOR CONSTRUCTION



ROLE ENGINEER	DPL
ROLE MANAGER	MNB
FACE REVIEW	MNB
REVISIONS	

PROJECT	DATE	SHEET NO.	1 OF 1
216-22	05/24/16		

**KENT GREEN BOULEVARD EXTENSION
KENT, CONNECTICUT
CONCEPTUAL LAYOUT CONSTRUCTION COSTS
MAY 2016**

III. CONTRACT ITEMS

ITEM	QUANTITY	PAY UNIT	UNIT COST	TOTAL COST
A - ROADWAY & UTILITY ITEMS				
EXCAVATION EARTH (STRIP TOPSOIL)	1300	CY	\$30	\$39,000
FORMATION OF SUBGRADE	3800	SY	\$5	\$19,000
BORROW	2700	CY	\$20	\$54,000
PROCESSED AGGREGATE BASE	700	CY	\$50	\$35,000
SUBBASE	900	CY	\$42	\$37,800
BITUMINOUS CONCRETE PAVEMENT	700	TON	\$130	\$91,000
CATCH BASIN	7	EA	\$3,000	\$21,000
STORM MANHOLE	4	EA	\$4,500	\$18,000
HDPE PIPE	550	LF	\$50	\$27,500
HDPE FLARED END	6	EA	\$700	\$4,200
INFILTRATION SYSTEM	1	LS	\$30,000	\$30,000
SANITARY FORCE MAIN	1200	LF	\$80	\$96,000
SANITARY MANHOLE	2	EA	\$5,000	\$10,000
8" WATER MAIN	1500	LF	\$115	\$172,500
TOPSOIL & TURF ESTABLISHMENT	2700	SY	\$8	\$21,600
TOTAL CONSTRUCTION ITEMS				\$676,600
B - LUMP SUM ITEMS (PERCENTAGE OF A)				
MOBILIZATION (7.5%)	1	LS	\$50,745	\$50,745
TRAFFIC MAINTENANCE (0.5%)	1	LS	\$3,383	\$3,383
CONSTRUCTION STAKING (1.0%)	1	LS	\$6,766	\$6,766
CLEARING & GRUBBING (1.0%)	1	LS	\$6,766	\$6,766
TOTAL LUMP SUM ITEMS				\$67,660
TOTAL CONTRACT COSTS				
TOTAL CONSTRUCTON ITEMS (A)				\$676,600
TOTAL LUMP SUM ITEMS (B)				\$67,660
TOTAL CONTRACT ITEMS				\$745,000
CONTINGENCY				
20% OF (A + B + C)				\$149,000
TOTAL ESTIMATED COST				\$894,000

Key Elements

The key elements of an “IHZ-compliant” regulation (as compared with the recommended regulation) include the following:

- Overlay zone
- Density allowed for mixed use development must be at least twenty (20) units per acre
- Approval must be administrative in nature (i.e., site plan approval)

Affordability Term

While the statutory requirement is that the affordability term has to be at least 30 years, Kent could establish a longer term (including perpetuity).

Policy Option for the Mixed Use Area

“IHZ-Compliant” Regulation

Section 8A Village Mixed Use Overlay

8A.1 Purpose

The purpose of the Village Mixed Use Overlay District as delineated on the Zoning Map is to encourage the development of mixed-use buildings including affordable housing units within a portion of the Kent village area.

As an overlay district, a property owner may choose to utilize the provisions of the underlying zone or utilize the provisions of the overlay zone.

8A.2 Permitted Uses - The following uses shall be permitted subject to **Site Plan approval in accordance with Sections 4.3 through 4.8** and other applicable provisions of these Regulations:

2. Mixed residential and commercial use within the same building at a maximum dwelling density of **twenty (20) units per acre** provided that:
 - a. The first floor shall be limited to business or service use as permitted in the underlying zoning district.
 - b. At least **twenty percent (20%)** of the dwelling units will be conveyed subject to an incentive housing restriction requiring that, **for at least thirty years** after the initial occupancy of the development, such dwelling units shall be sold or rented at, or below, prices which will preserve the units as housing for which persons pay thirty per cent or less of their annual income, where such income is less than or equal to eighty per cent or less of the area median income as reported by the United States Department of Housing and Urban Development.
 - c. New uses or habitable structures shall be permitted only if supplied with public water and served by a sanitary sewer system or other sewage disposal system approved by the State Department of Energy and Environmental Protection (DEEP).

8A.3 Permitted Accessory Buildings, Structures And Uses.

1. Any accessory buildings, structures or uses, customarily incidental and directly related to the operation of the permitted, principal use.
2. Signs, in accordance with Section 19.

(continued on next page)

(continued from previous page)

8A.4. Special Provisions.

8. No dwelling units shall contain more than two (2) bedrooms.
9. Within the Village Mixed Use Overlay District, the Area and Dimensional Requirements in Section 5.5 shall continue to apply except as modified below:

Maximum Building Coverage

• Principal Building(s)	45%
• Principal w/Accessory Buildings	50%

Maximum Building Height

• Stories	3.5 stories
• Height	45 feet

10. The limitation on the size of a structure as contained in Section 8.4.2 and/or 8.2.14 shall not apply.
11. Off street parking and loading shall be provided in accordance with Section 18 except that the parking standards for mixed residential and commercial use within the same building shall be as follows:

**Minimum Number Of
Spaces Required**

Multi-family dwellings	1.5 spaces per dwelling unit
Any business use allowed in the underlying district	1 space per 250 SF of gross floor area

12. All development activities shall be subject to design review in accordance with the provisions of Section 5A of these Regulations (Kent Village District).
13. An “affordability plan” meeting the requirements of the Connecticut Department of Housing and in accordance with CGS Section 8-30g(b) shall be submitted with any application under this Section. The administrator of the affordability plan shall be a third party entity proposed by the applicant provided such party is acceptable to the Commission.
14. Affordable units shall have the same finishes and specifications as market rate units and shall be spread throughout the development in an equitable fashion.

Key Elements

The key elements of an “IHZ-compliant” regulation (as compared with the recommended regulation) include the following:

- Overlay zone
- Density allowed for single family development must be at least six (6) units per acre
- Density allowed for duplex development must be at least ten (10) units per acre
- Approval must be administrative in nature (i.e., subdivision approval and site plan approval)

Affordability Term

While the statutory requirement is that the affordability term has to be at least 30 years, Kent could establish a longer term (including perpetuity).

Policy Option for the Field Area

“IHZ-Compliant” Regulation

Section 8B Village Incentive Housing Overlay

8B.1 Purpose

The purpose of the Village Incentive Housing Overlay District as delineated on the Zoning Map is to encourage the development of housing including affordable housing units within a portion of the Kent village area.

As an overlay district, a property owner may choose to utilize the provisions of the underlying zone or utilize the provisions of the overlay zone.

8B.2 Permitted Uses –

1. The following uses shall be permitted subject to the provisions of this Section:

a. Single family dwellings in accordance with the following:

Minimum Lot Area (if a subdivision)	5,000 SF
Maximum Density (if common interest)	6 units per gross acre
Minimum Lot Width	50 feet
Minimum Front Yard Setback	15 feet
Minimum Side Yard Setback	8 feet
Minimum Rear Yard Setback	25 feet

b. Duplex development (two dwellings sharing a common wall).

Minimum Lot Area (if a subdivision with one duplex building per lot)	6,000 SF
Maximum Density (if a common interest community)	10 units per gross acre
Minimum Lot Width	60 feet
Minimum Front Yard Setback	15 feet
Minimum Side Yard Setback	8 feet
Minimum Rear Yard Setback	25 feet

(continued on next page)

(continued from previous page)

2. The above uses shall be permitted subject to:
 - a. subdivision approval in accordance with the Kent Subdivision Regulations (if separate lots are to be created), or
 - b. site plan approval in accordance with Sections 4.3 through 4.8 and other applicable provisions of these Regulations (if a common interest community).
3. All development under this Section shall comply with the following:
 - a. At least twenty percent (20%) of the dwelling units will be conveyed subject to an incentive housing restriction requiring that, for at least thirty years after the initial occupancy of the development, such dwelling units shall be sold or rented at, or below, prices which will preserve the units as housing for which persons pay thirty per cent or less of their annual income, where such income is less than or equal to eighty per cent or less of the area median income as reported by the United States Department of Housing and Urban Development.
 - b. New uses or habitable structures shall be permitted only if supplied with public water and served by a sanitary sewer system or other sewage disposal system approved by the State Department of Energy and Environmental Protection (DEEP).
 - c. A roadway connection in a configuration acceptable to the Commission is made from the village business area to Maple Street Extension.

8B.3. Permitted Accessory Buildings, Structures And Uses.

1. Any accessory buildings, structures or uses, customarily incidental and directly related to the operation of the permitted, principal use.
3. Off street parking and loading shall be provided in accordance with Section 18.
4. Signs, in accordance with Section 19.

8B.4. Special Provisions.

1. At least twenty percent (20%) of the area of the parcel shall be set aside as open space/drainage area in order to facilitate the infiltration of runoff and drainage from the site and areas upstream.
2. All development activities shall be subject to design review in accordance with the provisions of Section 5A of these Regulations (Kent Village District).

(continued on next page)

(continued from previous page)

3. Affordable units shall have the same basic finishes and specifications as market rate units and shall be spread throughout the development in an equitable fashion.
4. An “affordability plan” meeting the requirements of the Connecticut Department of Housing and in accordance with CGS Section 8-30g(b) shall be submitted with any application under this Section. The administrator of the affordability plan shall be a third party entity proposed by the applicant provided such party is acceptable to the Commission.
5. In the case of a common interest community, a certificate of zoning compliance precedent to issuance of a certificate of occupancy shall not be issued for a market rate unit if doing so would cause there to be more than three market rate units for each affordable unit.
6. In the case of a subdivision, the applicant shall demonstrate a methodology acceptable to the Commission whereby the affordable housing units will be constructed on a “pro rata” basis such that there will not, at any time, be more than three market rate units completed for each affordable unit completed. Such methodologies may include, but are not limited to:
 - a. The developer will build all the units and take responsibility for the “pro rata” approach where there will not be more than three market rate units completed for each affordable unit completed,
 - b. Provision of a financial guarantee in a form and amount acceptable to the Commission providing for the actual construction of the affordable housing units and associated improvements (full construction cost rather than estimated sales price) proposed by the developer in order to utilize the higher density allowed by this Section of the Zoning Regulations, or
 - c. Other approach acceptable to the Commission to ensure the actual construction and occupancy of the affordable units within a defined time frame.

The preparation of this material was supported by a technical assistance grant from the Connecticut Office of Policy & Management as part of the Incentive Housing Overlay Zone program.

Technical Assistance in the preparation of this report provided by:



**CROSSKEY
ARCHITECTS**
Architecture + Preservation + Interiors

