



Affordable Housing Plan

TOWN OF PLAINFIELD
2021-2026 Plan



Affordable Housing Plan

Town of Plainfield, Connecticut

Town of Plainfield, Connecticut
PLANNING & ZONING DEPARTMENT

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PLAINFIELD AFFORDABLE HOUSING



01

How did we get here?

In July of 2017 new legislation, known as PA 17-170, was passed in Connecticut requiring that every five years all towns adopt or amend an Affordable Housing Plan. The Act went further to clarify that “such plan shall specify how the Municipality intends to increase the number of affordable housing developments in the Municipality”.

This Act, along with CT General Statute 8-2 which outlines that Regulations adopted by a Town should “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 our State, is what created the need for the Town to develop this plan.

The Town sees the need to develop this plan as a starting point to begin a thorough review of the current status of the housing situation in Plainfield, as well as the needs of its current and future residents to determine what needs to be done. Specifically, encouraging people to establish residency in Plainfield and ensuring that existing housing stock is capable of accommodating the changing needs of the Town’s current residents well into the future.

Beyond that, while the goal is to specifically deal with “Affordable Housing” as defined by Statute, this plan will also focus on how the Town can make housing overall more appropriate and attainable. Not unlike most towns in Connecticut, for most residents in Plainfield, housing costs are the largest financial burden. Nearly three in ten households (29%) in Plainfield spend thirty percent (30%) or more of their income on housing. For Plainfield residents who rent their homes, this number was nearly 50%, with a quarter (24%) of rental households spending more than 50% of their income on housing costs. The Town believes these numbers are too high and recognizes that when residents are spending too much on housing costs, they don’t have additional finances available for things such as childcare, groceries and medical expenses, or other goods and services that are crucial to the support of the local and regional economy. Based on that, anything the Town overall can do to create attainable, appropriate, and reasonably priced housing, be it deed-restricted Affordable or simply additional units will stand to benefit the Town as a whole.

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What is Affordable Housing?

Rising housing costs, and the idea 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 and the barriers to housing attainment this created for many, the State established the Blue-Ribbon Commission (BRC). Following the BRC's examination of the housing situation, a report was submitted to the Legislature with numerous recommendations, one of which was to create the affordable housing appeals procedure known today as Section 8-30g.

Affordable Housing can mean different things to different people. To most, the term affordable housing simply refers to housing that is reasonable in cost. However, within the context of this plan, the term "Affordable Housing" refers to a type of housing that meets specific criteria outlined by the Statute.

In Connecticut, an Affordable housing unit is defined as a dwelling that costs less than thirtypercent of the income of a household earning eighty percent of the Area's Median Income and has been deed restricted to ensure that the housing unit will remain "Affordable" for a period of forty years. According to the Department of Housing and Urban Development's 2020 income data, that amount was \$86,900 for a household of four in the Worcester, MA/Windham County, CT HMFA. Because the 2018 American Community Survey listed Plainfield's median household income at just over \$67,409, this lower number is used for the analysis of affordable housing options.

When the term "Affordable Housing" is used, most think of large, institutional-style buildings with very high density on very small parcels. However, that is becoming increasingly not the case. Affordable housing units can be created with as little as one unit and employ many design types with different development sizes working differently based on the specific market demand for that area. You might have single-family (attached or detached), small- scale multi-family, or larger scale developments with multiple units, all of which can be rented or owned.



As mentioned previously, subsection 8-30g of the Statutes identifies that any city or town that does not have at least ten percent (10%) of its housing stock deed-restricted as “Affordable” is subject to an appeal under this Section. This process not only puts the burden of proof on the Town rather than the applicant, but it also requires the Town to demonstrate that if the project had been approved, it posed a sincere threat to “public interests in health, safety or matters which the Commission may legally consider” and that “such public interests clearly outweigh the need for affordable housing”. Case law has almost exclusively supported these appeals and decided in favor of the developers. The courts have overwhelmingly found that the need for Affordable housing almost always outweighs other matters.

In the case of Plainfield, however, the community is currently exempt from being subject to an Affordable Housing Appeal. As of 2019, the Town had a total of 12.49% of its 6,229 housing units being assisted and income limited to lower- and moderate-income residents. While this exemption releases the Town from responsibility to accept new housing development through the 8-30g appeals process, it does not exempt the community from being responsible for completing an Affordable Housing Plan via Section 8-30j. Quite apart from the 10% numerical threshold, the Affordable Housing Plan statute simply requires that the Town describe how it will “increase the number of affordable housing developments in the Municipality” over a five-year period. Accordingly, the Town has significant flexibility to set its own targets and chart its own path.

03

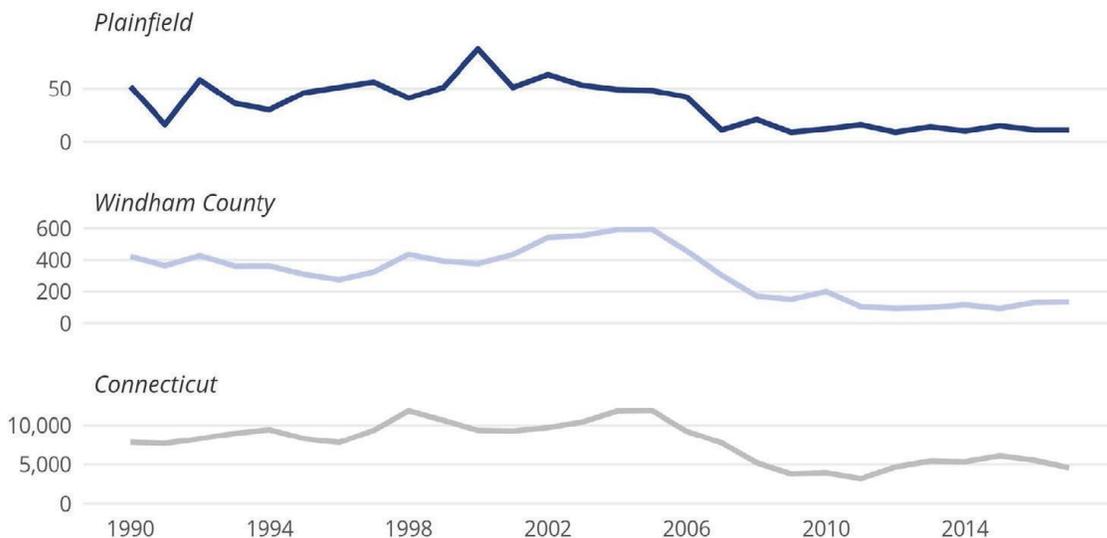
What is Plainfield's Current Housing Situation?

The Town of Plainfield’s growth has been representative of the population and housing trends of other rural and suburban Connecticut towns. As families moved from the cities out into the suburbs beginning in the 1950s and the interstate highway system opened more remote communities up as bedroom communities, Plainfield’s population began a long, gradual growth. The 1970 Census recorded just under 12,000 residents, and by 2010, the Town’s population was at 15,400.

Following the building booms of the late 1990s and 2000s, and the housing crisis of 2008, housing and population growth have basically stalled, and the population is anticipated to decline for the projectable future. For the decade after 2008, there has been an average of 8-16 new homes built each year in Plainfield, which trend almost directly reflects proportionally to Windham County as a whole.

Number of building permits per year, 1990-2017

Note: y axis varies between locations



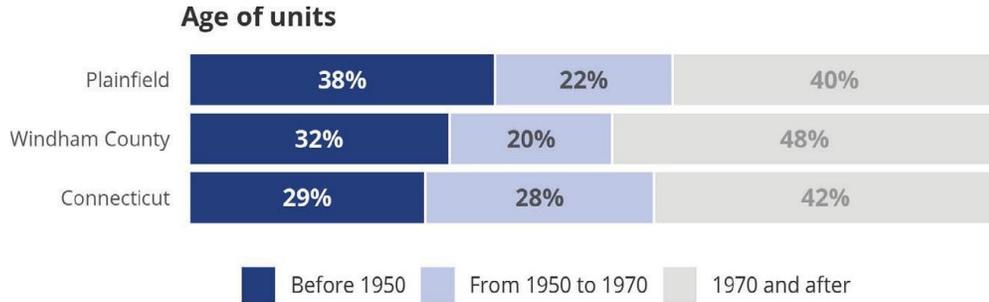


The Partnership for Strong Communities put together a series of analyses and visualizations to help Connecticut municipalities better understand their current housing stock, demographics, and elements of affordability. Many of the graphics presented in this overview are drawn from their 2020 Housing Data Profiles, which can be found at [https:// housingprofiles.pschohousing.org](https://housingprofiles.pschohousing.org).

Reflecting the fact that recent housing development has been relatively slow in Plainfield, adding less than 0.5% to its housing stock annually, the Town has a significantly aging housing supply. Approximately 60% of the existing housing units were built before 1970

– much of that (38% overall) being built before 1950. With 40% of the housing stock constructed within the last 50 years (much of that in the building booms between the mid-1980s and early-2000s) is quite a bit older than Windham County, but similar to (albeit slightly older than) Connecticut overall. An aging housing stock can be an indicator of poor housing quality, so the relatively high proportion of very old houses (pre-1950) is a concern, though maintenance of its mid-age housing stock should also be monitored.

As of the 2018 American Community Survey, Plainfield had 6,367 housing units, with the majority (65%) made up of single-family detached residential structures. The remaining 35% of the housing stock were multi-family (2+ units per structure) in nature, with over 15% of the total comprised of duplex units or single-family attached. Nearly 9% were smaller multi-family (3-4 units/structure) developments. There was a small number of higher-density (10-49 units per structure) developments, accounting for approximately 5% of the total. As a mixed community of rural and denser village areas, Plainfield is fairly reflective of Connecticut overall. Statewide, the mix is nearly identical, with 64% of the housing stock comprised of single-family detached units and the remaining 35% are multi-family units.



Source: 2018 American Community Survey via Partnership for Strong Communities

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.

Units in Structure, Plainfield

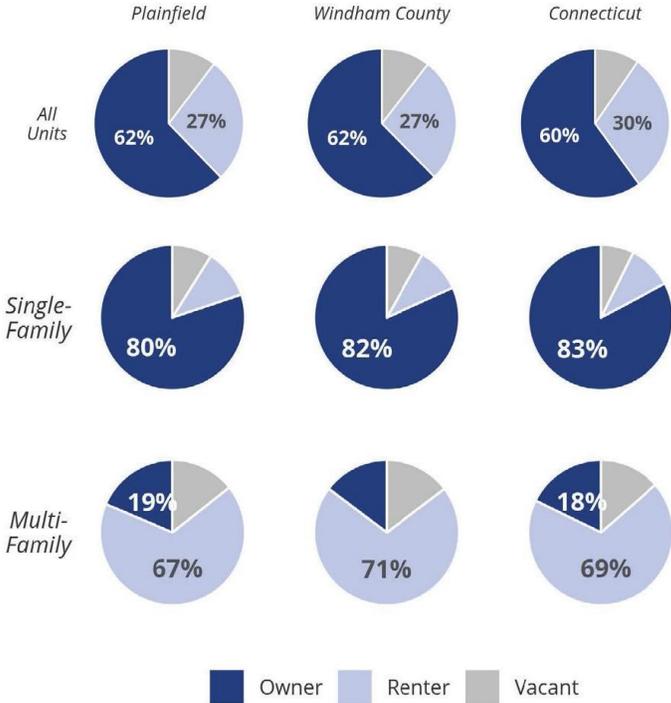
	1, detached	1, attached	2 family	3 or 4 family	5 to 9 family	10-19 family	20+ family	Mobile Home	Boat, RV, Van or similar
Units	4,112	368	614	540	333	179	134	87	0
Percentage of units	64.6%	5.8%	9.6%	8.5%	1.9%	2.8%	2.1%	1.4%	0%

Source: 2018 American Community Survey, 5-year estimates

Ownership and Occupancy

Statewide, approximately 60% of housing units are owner-occupied, with 30% renting and approximately 10% of housing units vacant. In Plainfield, the percentages of owner- occupancy are just slightly higher, with 62% of total units being occupied by the property owner, and 80% of single-family units being owner-occupied. Two thirds (67%) of the Town’s multi-family units are renter-occupied. These percentages generally mirror occupancy percentages for Windham County and the State quite closely.

For both home rental and home sales prices, Plainfield costs run well below the larger geographies. As of the 2018 American Community Survey (via CERC 2019 Community Profile), the median sales price for homes in Plainfield was \$171,300, which is below the Windham County median of \$196,800 and substantially below the Connecticut median of \$270,100. While the housing crash of 2008-09 may have significantly diminished housing construction activity in Windham County, the median home prices in Plainfield do not seem to have suffered long-term and it retains its relative affordability. The median rent in town was \$832, which is also just below the levels seen in the Windham County median of \$869 and nearly 30% below the State median rent of \$1,123.



Source: 2018 American Community Survey via Partnership for Strong Communities

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, as previously mentioned, are defined by the State as those units that are subsidized below market rate through deed restrictions, income limitations, or programs like HousingChoice 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 guarantee of affordability.

As of the 2019 Affordable Housing Appeals List, the Department of Housing recognized that 778 of Plainfield’s 6,229 housing units, or 12.49% of the total housing stock as Affordable, which exceeds the statute’s 10% requirement. Of those, just under half were governmentally assisted, including Sunny Acres managed by the Plainfield Housing Authority. The remaining Affordable units were split between tenant rental assistance (tradition Section 8 vouchers) and homeownership situations in which the owner received mortgage assistance from the Connecticut Housing Finance Authority (CHFA) or the United States Department of Agriculture (USDA). Plainfield is one of approximately 30 of Connecticut’s 169 municipalities with more than 10% of its housing stock listed as “supported” or Affordable and thus is exempt from the requirements of Section 8-30g.

CHFA/USDA Mortgages	Governmentally Assisted Units	Tenant Rental Assistance	Deed Restrictions	Total Assisted
228	337	173	0	778 (12.49%)

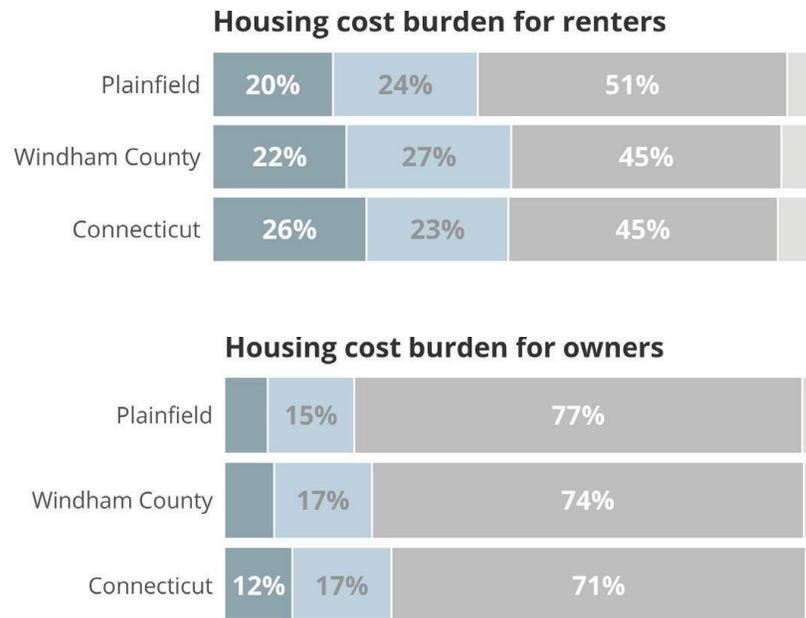
Source: CT Department of Housing, 2019 Affordable Housing Appeals Listing

Incomes and Cost Burden

The fact that Plainfield exceeds the statutory threshold of 10% affordable housing stock, and the majority of housing units in Plainfield are owner-occupied, does not mean that every homeowner is able to easily afford to live in that home and easily keep up with mortgage, taxes, heating, and other maintenance costs. It is not uncommon for both renter- and owner- households to be considered “cost-burdened” by their housing expenses. 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.”

In Plainfield, as many as 49% of rental households are either moderately or severely cost-burdened, and approximately 23% of owner-occupied households are similarly burdened. The average renter, however, pays 23% of their income on housing, which indicates that there is some complexity in the data. Some of the alleviated cost burdens could be attributed to government rental assistance or rent limits. Another part of the complexity of the numbers can reflect the reality that some renters are truly struggling with a high-cost burden. These overall numbers are not positive, as that means at least a quarter of households, and as many as a third of households in Plainfield, face a struggle to afford housing, including half of the renters. However, the combination of relatively low housing costs for both purchase and rental options in Plainfield, and the higher percentage of governmental-assisted units, place the Town's percentages of cost-burdened households below both Regional and State averages.

The differences in cost burden between owners and renters in Plainfield are also reflected in the relative affluence of these two groups. On average, homeowners with a median household income of over \$90,436 expend just approximately 18% of their income on housing expenses. Renters, with a dramatically lower median household income of just over \$43,500, pay on average 23% of their income on housing.

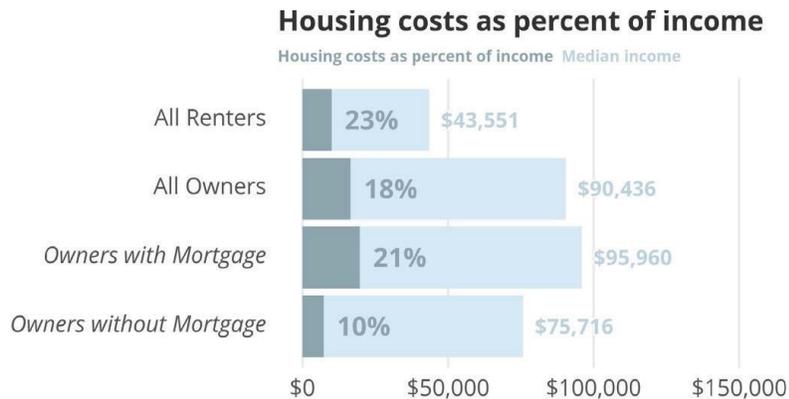


Source: 2018 American Community Survey via Partnership for Strong Communities



In most towns, this disparity would result in renters in particular spending an unsustainable portion of their incomes on housing, but the relative affordability of housing options in Plainfield seems to have kept this expenditure somewhat contained. Overall median household income was \$67,409 as of the 2018 American Community Survey.

As seen in the discrepancy between owner and renter incomes, it is clear that rental units, due to relatively affordable rent levels, provide a fairly substantial supply of housing opportunity at rates that are attainable, if not universally so. Each year, the National Low Income Housing Coalition (NLIHC) calculates the hourly wage that would be required in order to afford a two-bedroom rental unit without slipping into a cost-burdened scenario. Thanks to the existing stock of income-restricted rental housing and the overall lower rates for rents, the “housing wage” in town is lower than the overall state average. According to the 2019 NLIHC calculations, Plainfield’s “housing wage” is \$19.62/hour, well below Connecticut’s housing wage of \$26.42/hour but still more than 150% of the State’s minimum wage.



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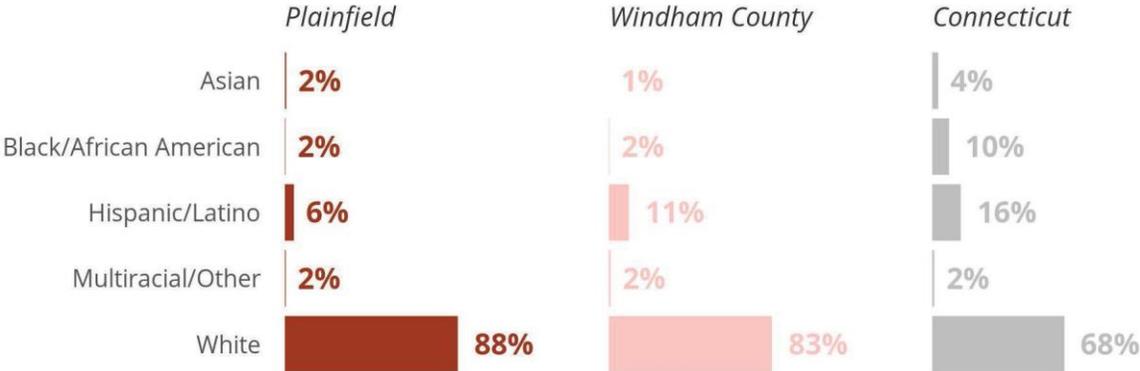
Plainfield’s Current & Projected Population

Current Population

While analysis of population and demographics are only snapshots in time, it has been the case that Plainfield residents are slightly older, whiter, and less diverse than both Windham County and Connecticut generally. As of 2018, Plainfield had 15,114 residents, which were predominately (88%) white non-Latino, with the remaining 12% being made up of BIPOC (Black, Indigenous, and People of Color), divided largely between Hispanic/Latino, Black, and Asian populations.

The median age in Plainfield of 43 years is slightly older than Connecticut’s median of 40.8 years and comparable to Windham County’s number of 44 years old. The slightly older population is also reflected in the relatively higher rates of homeownership in Plainfield relative to Connecticut overall.

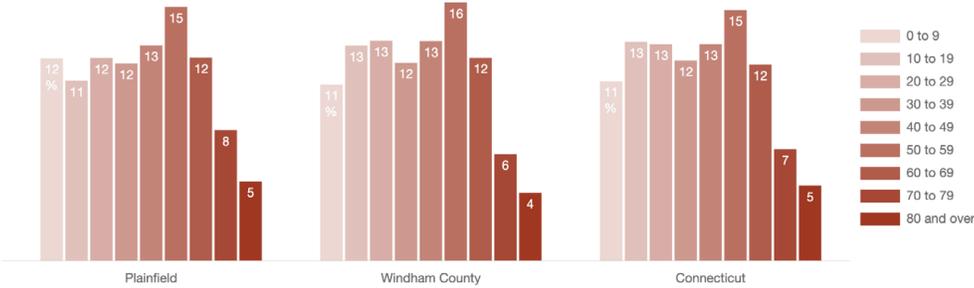
The largest race/ethnicity group in Plainfield is White at 88% of the population



Source: 2018 American Community Survey, via Partnership for Strong Communities



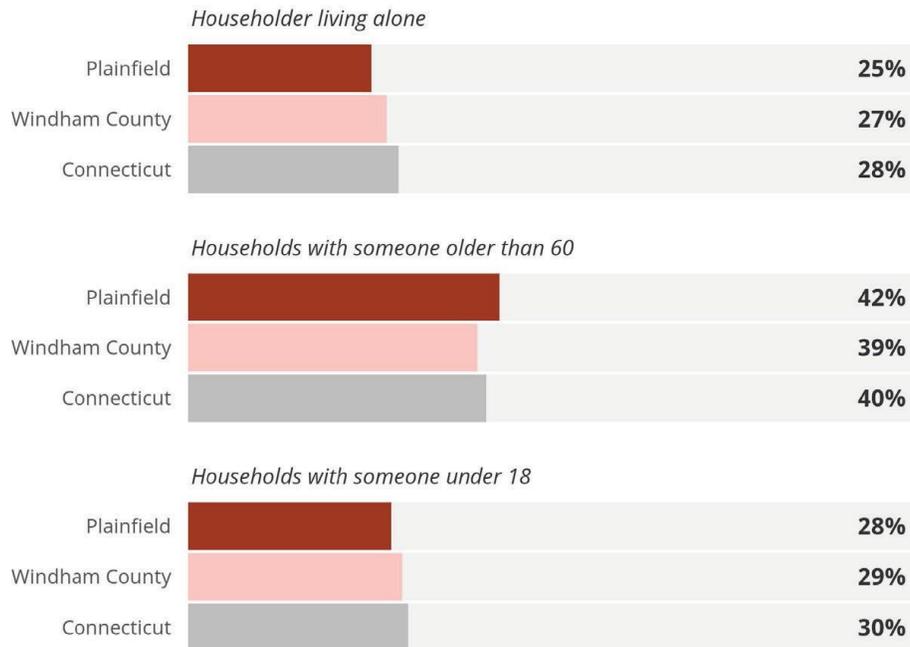
The largest population cohorts in Plainfield were in the 50-59-year-old range, with 15% of the total population, and the 40-49 and 60-69-year-old ranges, with 12-13% each. Overall, 40% of the total population of Plainfield was over 50 years old.



Source: 2018 American Community Survey via Partnership for Strong Communities

As a semi-rural, single-family residential community, Plainfield traditionally had larger average household sizes than both Windham County as a whole and the State of Connecticut, exceeding both with an average household size of 2.65 people as of the 2000 Census. Despite that, the average household size in Plainfield declined gradually from 2.65 persons/household in 2000 to 2.61 persons/household in 2018, a similar decline relative to Windham County and in contrast to the State (which saw a slight uptick in household sizes). These snapshots and trends will be important considerations when projecting and planning for housing needs and affordability into the future. Even relatively slow growth in total population may generate higher demand for housing units because more people are living alone.

Household types as a percent of total



Source: 2018 American Community Survey via Partnership for Strong Communities

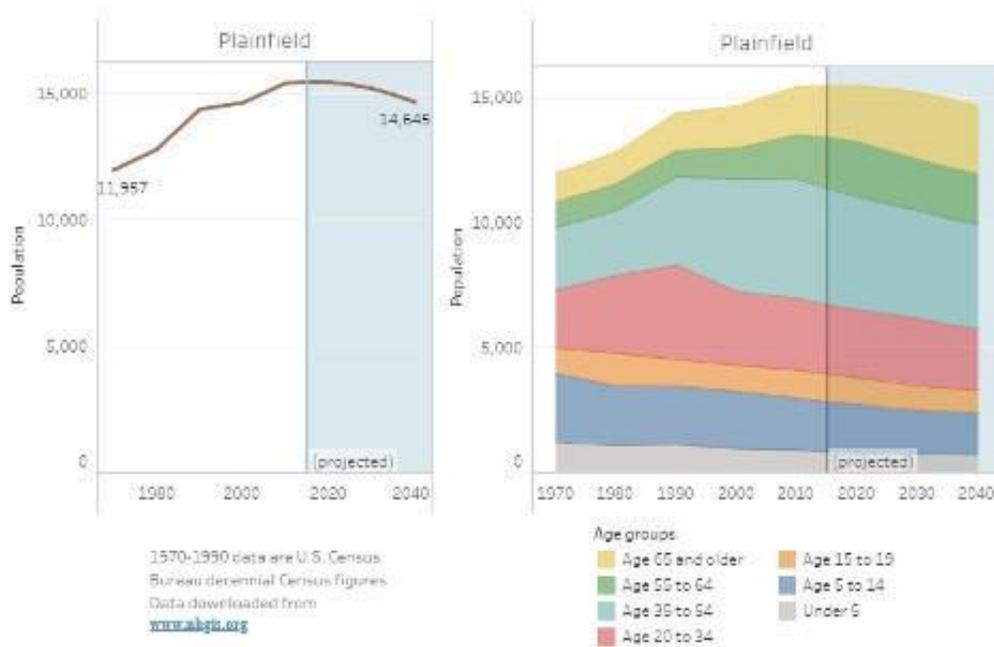
While Plainfield had slightly fewer households with a resident living alone, it did have more households with someone over 60, and slightly fewer with a resident under 18, than Connecticut generally. The overall reduction in household size and above-average medianage is also an indicator that the Town has a low “replacement” rate which is a matter of concern when considering the Town’s overall financial sustainability long-term.

Projected Population

Looking to the projectable future based on these trends, the Connecticut State Data Center predicts that Plainfield’s population, which has grown steadily over the last four decades, is likely to decline gradually over the next twenty years. If this data is accurate, Plainfield may be at, or just beyond, its peak population of just over 15,000, which is not uncharacteristic for the Region.

Breaking down this same projection into age cohorts, the State Data Center anticipates that nearly all age groups will be stable or will slightly decline in overall numbers in Plainfield, with the exception of senior citizens aged 65 and over. This group is anticipated to grow from its 2015 number of 2,083 to a peak of 2,732 in the year 2035 and leveling out from there. In contrast, the high school-age population of 1,113 in 2015 is projected to decline to under 900 by the year 2035, and young adults (20-34) are projected to shrink from around 2,765 to under 2,500 in the next two decades. These changes are not very dramatic in raw numbers, and Plainfield’s overall population fluctuations are somewhat milder than projected changes in other parts of Connecticut.

This projection does not reflect scientific certainty nor the definitive fate of the population of Plainfield, but it does provide some very important insights into the housing needs of the Town going forward. Single-family housing suitable for young and growing families is likely to decline in popularity, while housing suitable for an aging population will likely increase. The demand for an expansion of Housing Authority facilities will escalate and waiting lists may grow longer. The effect that the overall population decline in raw numbers may have on housing demand could be partially mitigated by shrinking household sizes. As an aging cohort seeks to divest themselves of larger, more expensive- and maintenance-intensive housing, an opportunity to market these properties to younger families may be created. In addition, aging residents seeking to remain in town may create demand for smaller, less expensive, and lower-maintenance housing opportunities.



Source: Population projections by CT State Data Center

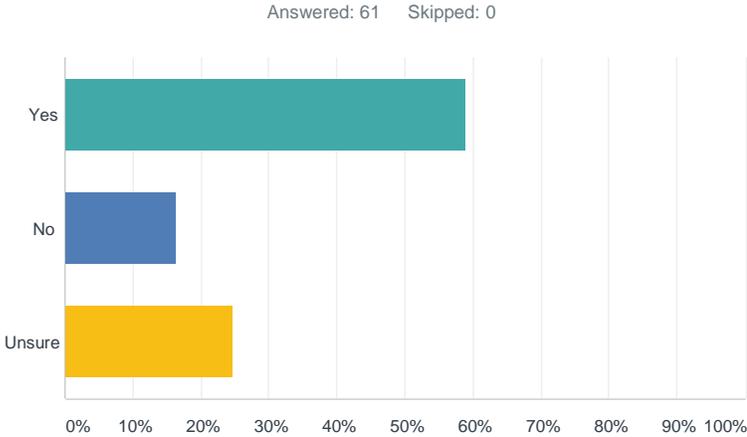
Some potential economic or market shifts in the projectable future may also impact the demand for types and location of housing. In particular, a potential large distribution facility proposed for Amazon has the potential to add hundreds if not thousands of jobs to the area. While that company has pledged to focus on hiring local residents, which would not necessarily shift housing demand, the overall effect of such a large commercial entity being added to town presents the potential of creating both housing development and redevelopment opportunities.

05

Community Survey Results

The Town’s Affordable Housing Plan consultant, working with the Town Planner, conducted a public outreach survey to gauge residents’ views of their current housing supply, affordability of the housing inventory, and opinions on future needs of the community. Over 60 residents responded, and the replies generally reflected the fact of Plainfield’s small-town, single-family approach, but with a recognition of the challenges of affordability. Approximately 70% of respondents were homeowners, 18% were renters, and the remainder declined to answer. A solid majority of respondents (60%) indicated that affordable or attainable housing is an important component to Hampton’s longevity, residents were split about their belief that the housing options currently available were satisfactory to existing residents’ needs (35.4% saying yes, 37.5% saying no) and a similar split believed that this housing stock was sufficient to satisfy future demand as well (34.7% on each side).

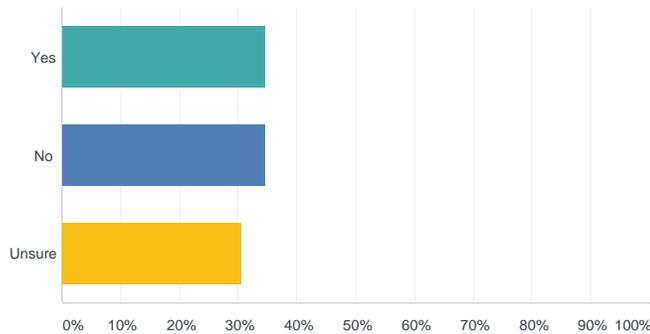
Q2 Do you agree that affordable or attainable housing is an important component of Plainfield’s longevity?



Despite this uncertainty, but lack of clear alarm about existing conditions, a strong plurality of respondents believed that increasing housing options would either positively impact the town or not have much effect at all (53% combined). In considering future housing needs, the two groups that were perceived to be most in need of additional housing options were seniors (40% listed among the top three choices), young professionals (44%), and young families (42%). The most popular types of housing development options were all single-family homes, on lots of various sizes. There was some appetite for seeing a slightly higher development density in the form of 2- and 3-bedroom apartments and townhouses as well.

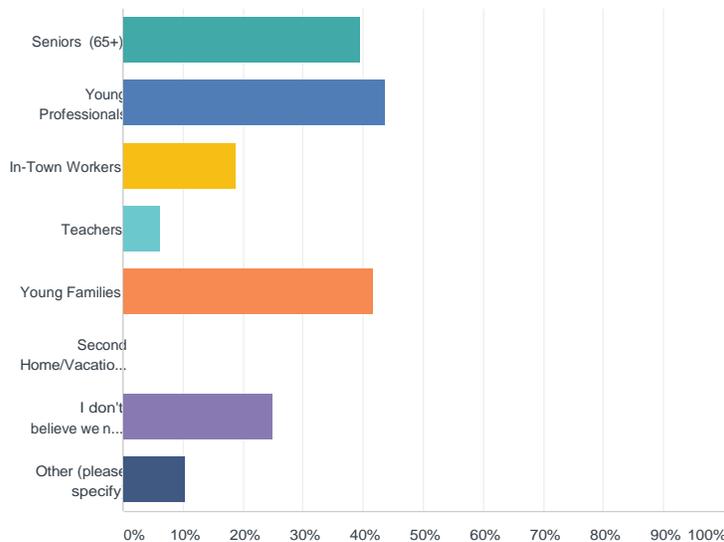
Q5 Do you think that the existing housing stock in Plainfield is adequate to satisfy future market demands?

Answered: 49 Skipped: 12



Q8 If you believe more housing options are needed in Plainfield, for whom do you think they are most needed? (Select top 3)

Answered: 48 Skipped: 13





In terms of the location of new development, the respondents were split on preferences. Generally, Plainfield Village received the highest aggregated totals, with more than 50% of respondents listing that Village as their first or second choice. Central Village was the top choice of only 2.4% of respondents. Moosup received approximately 43% combined for the top two choices, followed by Wauregan, which about 25% of respondents believed was a top-two location.

Overall, the number of responses was not substantial, but the trends served to inform both the community about the ongoing discussion and focus on the topic of affordable housing, and to inform the Town about general public preferences. These views were useful in shaping the ultimate recommendations for action items for this Plan.

Q10 If the Town were to focus on new housing options, which areas of Town should be of the highest priority? Use a scale of 0= Lowest Priority to 5=Highest Priority.

Answered: 45 Skipped: 16



06

How do Plainfield’s Current Policies Affect Affordable Housing?

As is evident in the Plan of Conservation & Development (PoCD) update adopted in 2018 and the community survey conducted in conjunction with this Plan, while the Town of Plainfield acknowledges the importance of housing options and affordable housing, there is a general sense that the Town has been providing a good level of opportunity for housing. At the same time, the provision of more housing options is also generally seen to be a positive direction a strong plurality of the public (46% saying “positive impact” vs. 26% saying “negative impact”). Even in a community with over 12% of its housing stock available to lower and moderate-income residents, more can be done.

With that in mind, The Town of Plainfield has determined that a concise evaluation of the current policy and regulatory environment is important to help inform any actions moving forward. While the PoCD and Zoning Regulations have wide applicability, the evaluation of these documents within the context of this Affordable Housing Plan is much more specific. The purpose of this section is to evaluate the overall regulatory environment in Plainfield get a sense of how, if at all, the Town’s policies currently facilitate and/or encourage the development and management of Affordable Housing. What follows is a table that summarizes the current policy, how the policy relates to housing development, any active proposals for policy change, and some recommendations for additional changes.

Plan of Conservation & Development

Adopted in 2018, the PoCD outlines broad goals and a few specific action steps related to the Town’s housing stock, focused within Chapter XV on pages 103-106. 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.

STATEMENT	RELEVANCE	COMMENT
Goal: To expand housing opportunities in a manner that which will meet the Town's housing needs by encouraging a wide variety of housing types for people of all ages and income levels.	Expansion of housing opportunities across age and income groups is the essence of the Town's housing mission.	There is no guidance provided in the PoCD for how this very important goal is to be achieved. Changes to Zoning Regulations and Town policies may be needed, and priority should be given to this task.
Goal: To encourage full utilization of older, larger single-family houses	Aging, larger houses can be a burden to maintain and costly from a tax standpoint. Encouraging full use of these homes, perhaps through higher-density retrofits, can provide sufficient financial resources for maintenance.	Implementation of this goal should be accomplished through changes to Zoning Regulations on the adaptive re-use of existing structures as well as the identification of municipal (or other) funding resources to assist with property maintenance or redevelopment.
Goal: To provide a wide spectrum of rental housing to ensure that the needs of individuals at all income levels are met.	Both ownership and rental housing options are critical to Plainfield's housing mix. Based on Census data, the great majority of Plainfield's rental stock is in multi-family complexes.	Expanding the types of multi-family opportunities through zoning and encouragement of expanded accessory apartments and smaller "middle" housing developments are appropriate implementation steps.
Goal: To rehabilitate existing substandard housing units to satisfy current code requirements.	Many aging housing units, particularly older MULTI-FAMILY units, have not been maintained. While historic properties should be respected, code concerns need to be addressed.	The Town should look to provide resources – either through direct funding opportunities or through connection to state or federal programs – to ensure homeowners know about assistance for property maintenance and rehab.
Goal: Encourage residential density which will maximize existing or planned sewer and water lines, when consistent with the Town's planned growth.	Focusing development in areas of public infrastructure is the best way to facilitate increased density and thereby reduce per-unit development costs for housing.	The Zoning Regulations should consider targeting more specific areas – village centers with infrastructure and access to jobs and transit – for higher allowable residential densities.
Goal: To provide more elderly housing, for all income levels and all levels of independence. Each village... should have available elderly housing.	Demographic trends indicate an aging population for Plainfield, which will mean changing housing demands. The housing needs for seniors should be considered.	Work with stakeholder groups to identify the types of housing (scale, accessibility) and related amenities that would provide support for aging residents and incorporate these elements into regulations or incentive programs.
Goal: To encourage the use of the Conservation Subdivision Regulations to promote the preservation of Open Space	The Conservation Subdivisions allow for standard development densities, but on smaller lots to allow for the setting-aside of larger areas of open space.	Providing housing density bonuses in exchange for higher percentages of conservation land set-asides will encourage developers to protect open space. In addition, a Transfer of Development Rights program could balance increased preservation in environmentally important areas and increased development activity in areas of existing infrastructure.
Goal: Continue to promote the efforts of the Town of Plainfield (Small Cities CDBG), Farmer's Home Administration (Self-help Program), and HUD in rehabilitation of existing units and construction of new homes.	State and federal financial assistance is available to develop and maintain residential units, and the Town should take advantage of these programs.	Promote, through the Housing Authority, Selectmen, Land Use, and Economic Development Departments, the resources and assistance available.
Recommendation: The Town should create zoning that encourages a higher density of land use in areas that are currently developed and are close to the service centers of the Town (Village Centers).	Identification of specific areas where increased density and activity should take place is a major role of the PoCD in informing zoning policy.	The "Future Land Use Plan" of the 2018 PoCD should be further refined to review existing infrastructure and provide more detail of the scale of development that would be appropriate in each development area. In addition, only "Commercial/Industrial" areas are targeted for growth. Residential growth areas should be identified.
Recommendation: Parcels of land that can be served by municipal sewer should be reviewed to whether or not they can be subdivided at the highest density while providing open space.	Where both development opportunity (via sewers) and conservation priority (open space resources) may intersect, the PoCD should provide guidance.	A refined Future Land Use Plan map could consider transportation hubs, villages, infrastructure, and job centers to target residential growth areas.

PLAINFIELD AFFORDABLE HOUSING

<p>Goal: Encourage Use of Planned Development District</p>	<p>This Goal, found in Chapter VII. Economic Development focuses on the redevelopment of mixed-use commercial and residential corridors in key areas to reduce sprawl in rural areas.</p>	<p>Two PDDs have been approved in Plainfield, and only existing Commercial or Industrial areas are eligible. Expansion to residential areas and allowing residential uses to be a more significant component of developments may encourage the wider use of this tool.</p>
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Zoning Regulations

The Town has a current set of Zoning Regulations in effect, which have guided development in Plainfield since their initial adoption in 1972. They have been amended in a piecemeal fashion, based largely on specific petitions or applications for minor modifications. They appear to have not been reviewed in a comprehensive manner in many years, which may be an appropriate step following the adoption of a new Plan of Conservation & Development, not only for purposes of housing development but for all other PoCD goals. The version of the Regulations reviewed here was amended through August 1, 2019.

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.

TOPIC	RELEVANCE	CURRENT REGULATION	COMMENT
Residential Density	Increased densities allow for more housing units on a given parcel of land, increasing opportunity and lowering costs.	RA-60 and RA-40 Districts allow only single-family units as of right. RA-30 and RA-19 allow up to four units per parcel, assuming more acreage. Garden apartments are also allowed in these latter two districts via Special Permit.	The minimum lot area for apartments is 2 acres, regardless of sewer availability, and each unit adds at least ½ acre of required area. Historic villages were developed at much higher densities, and infrastructure would allow that. An across-the-board reconsideration of density is appropriate.
Accessory Apartments	Allowing secondary units in single-family areas can effectively double residential densities in a low-impact way and generate significant housing opportunities/opportunity.	Allowed via Special Permit in all Residential and Commercial districts, but must be attached and a maximum of 600 square feet, per Section 12.28. The owner must occupy one of the units. No duplex or comparably-sized units are allowed in RA-60 and RA-40.	Particularly in residential areas, ADUs should be allowed as of right, but subject to broad design criteria to maintain single-family character. Square footage cap could be raised to provide for two-bedroom units in certain cases, and owner-occupancy/owner occupancy could be relaxed as it is likely unenforceable.
Conversion of Single-Family to Multi-Family	Larger and historic single-family units could be updated to create multiple internal apartments, increasing opportunity.	Section 4.3.3 allows older (10-25+-year-old) homes to be converted to two or more dwelling units via Site Plan and Special Permit, and with larger lot sizes.	Instead of a Special Permit, the Regulations could allow via a Site Plan with some design criteria to streamline permitting and reduce costs.
Multi-Family Development	Multi-family is traditionally the best pathway toward affordable housing by virtue of unit size and density	Aside from the 1-4 unit potential of properties in RA-30 and RA-19, "Garden Apartments" as regulated in Section 12.2, are the only type of multi-family development allowed. This is allowed via Special Permit in RA-30 and RA-19 districts. Planned Development Districts are possible in Commercial and Industrial areas, but cannot have multi-family as a primary use. Section 12.30 allows for adaptive re-use of historic structures for both multifamily and mixed-use via special permit.	The minimum area per dwelling unit in RA-30 and RA-19 districts essentially mirror the single-family densities and thus does not increase community density in those areas where it would be most appropriate. Increased density should be allowed, particularly in village areas with sewer access. A wider variety of multi-family housing types and forms should be allowed, in keeping with the character of the neighborhoods. Primary-residential PDDs should be considered, particularly for the redevelopment of historic mill buildings and similar situations.
Inclusionary Zoning	Section 8-2i of the State Statutes allow towns to require affordable set-asides	Not anticipated in the Regulations.	Establishing a minimum requirement of affordability for larger developments and/or establishing a fund to facilitate further housing development would leverage resources for the Town at no cost.
Incentive Housing	Section 8-13n of the State Statutes allow communities to create higher-density areas with 20% affordable stock	Not anticipated in the Regulations.	Increased densities, particularly in village areas with infrastructure and the potential redevelopment of historic mill facilities, could make development projects more economically viable.

PLAINFIELD AFFORDABLE HOUSING

Mixed-Use	Allowing residential units to be added in commercial areas can increase opportunity and economic diversification.	Planned Development Districts, per Section 11 of the Regulations, may be applied in Commercial and Industrial Areas, but not to have residences as a primary component. Section 12.30 allows for adaptive re-use of historic structures for both multifamily and mixed-use via special permit.	Particularly in village areas with infrastructure, PDD eligibility should be more broadly available and flexible to allow for development creativity. Historic building and mill re-use regulations could also be clarified and expanded to allow for largely residential redevelopment.
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07

What Should be Plainfield's Affordable Housing Goal?



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 Plainfield will meet that requirement in both qualitative and quantitative ways. For the five-year period 2021-2026, the Town of Plainfield will seek to increase the number of affordable housing developments in Plainfield as follows:

1. Increase the number of USDA/CHFA loans through public information about these resources
2. Increase the total number of accessory dwelling units by reducing regulatory burdens
3. Increase the number of income-limited accessory dwelling units
4. Increase public awareness of Plainfield’s housing efforts
5. Promoting adaptive re-use of historic structures with wider housing opportunities

08

What Steps can Plainfield Take to Improve Housing Access?

Establish a Standing Housing Committee:

Whenever a municipality identifies a priority topic or action, the most immediate question should be “whose job is it?” Simply making a goal or vision statement is virtually useless unless there is a plan for implementation and accountability for action. In a small community such as Plainfield, there is not a significant administrative infrastructure for addressing the multi-faceted topic of housing. It is neither the core function of the Board of Selectmen or the Planning & Zoning Department and while the Housing Authority does have a Section 8 Administrator, that is a position of limited scope and authority.

To maximize the chances of success of delivering upon the mandate of CGS §8-30j and “increase the number of affordable housing developments” in Plainfield, a new, standing committee should be established. This Housing Committee should include representatives from the Board of Selectmen, Planning & Zoning Commission, Economic Development School Board, Housing Authority, local housing nonprofit groups, members of the real estate and banking community, as well as individual members of the public who have interest in this topic. As this Committee 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 this Plan and housing promotion generally remain a clear focus. Ideally, budgetary funds should be set aside for some additional administrative support and to allow for public outreach and information. Finally, some entity at Town Hall should be designated as the “Housing Officer” so that there is a specific answer to the question “who in Plainfield do I talk to about housing?”

Ease permitting requirements and promote ADUs as a concept:

In recent years, the regulatory provisions for accessory apartments in Plainfield have been rather narrow, limiting size, ownership, and occupancy. The process also requires a Special Permit, which can be an opaque, costly, and time-intensive effort for a relatively simple request.

The multiple requirements for adding a unit provide sufficient regulatory guidance that could be easily and objectively reviewed by Town staff on an administrative level and the community could be assured that public health, safety, welfare, and the neighborhood context would be preserved. As of the writing of this Plan (April/May 2021), the Connecticut General Assembly is considering several bills that would allow accessory apartments to be allowed in virtually any residential district across the state with just a staff-level review.

The fact that Plainfield has a significant number of accessory dwelling units and/or duplex housing (9% per the American Community Survey) is an indication that at some point, and for a long duration, these units were much easier to construct or permit. They exist and are generally supportive of the Town's community residential fabric. The Town could return to a more streamlined permitting approach for these units in a way that continues to support this settlement pattern. If and when a new, more permissive, regulatory standard is developed- either through local or state action- some effort to educate the community about this change should be undertaken. A simple series of articles in local papers, notifications on the Town website and social media pages, and even mailers to individual homeowners could dramatically increase the public awareness that ADUs will be available on most residential properties in Plainfield. The Town could also develop a guide 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 an extended family would appreciate and see benefit from this information.

Consider incentives for income restrictions on accessory apartments:

While most ADUs are generally available for individuals and households making less than the area median income, it is rare that these "affordable" units count toward the Town's total supply that qualifies under CGS Section 8-30g. The reason for this is that these ADUs are considered "naturally occurring affordable units" and are not protected by any deed restriction or income limitation that guarantees they remain affordable, regardless of housing market prices. A provision within the statute, Section 8-30g(k) allows accessory units to be income-restricted for 10-year periods. While Plainfield is not subject to the Affordable Housing Appeals Act from a procedural standpoint, if the Town wished to guarantee the availability of additional income-limited housing opportunities throughout Plainfield's neighborhoods, the Town could seek to incentivize property owners accordingly.

By providing a local property tax abatement or similar incentive, many property owners could be persuaded to place income limits or deed restrictions on their accessory units and make them available to lower-income tenants. In many cases, the difference between market rents for an accessory unit and restricted "affordable" rents may be very close, and it is only a matter of paperwork to convert the otherwise uncredited apartments to be included in the Town's official inventory. Should the Town proceed with that recommendation, it should also specify how this administrative task will be managed at Town Hall. Procedurally, the tax abatement could be similar to the "PA-490" open space provisions, in which a property owner signs an agreement not to develop a property for a period of ten years in exchange for a reduced tax assessment and tax bill.

The town would have to establish the value of that tax reduction, and the property owner would be responsible for filing an annual report demonstrating that their tenant is income-qualified to occupy the unit. In this way, the reduction could be an administrative procedure (similar to open space or elderly residents' abatement programs) and each individual petition would not have to be discussed at Town Meeting.

Relax requirements for middle-density housing as-of-right in certain areas, and as large-home retrofits:

Beyond single-family and two-unit housing (via ADU) to be allowed as-of-right throughout Plainfield, the Town should consider encouraging a wider range of housing opportunities that reflect historic settlement patterns and the existence of public infrastructure. Specifically, the Zoning Regulations could be modified to allow for smaller-scale multifamily housing options in certain locations and under certain circumstances. In many cases, three- and four-family dwellings can be designed and placed on single-family lots in single-family neighborhoods in a way that is virtually indistinguishable from the surrounding homes. Design considerations that include placement of doors, traditional pitch of roofs, and other architectural considerations, and location and screening of parking would provide for the visual assurance of context sensitivity.

While the current regulations for RA-19 and RA-30 do allow for up to four units on a lot, to add those units requires additional square footage. In most of the Town's historic villages and existing settled areas, these properties do not have sufficient acreage to expand and are thus ineligible. In a circumstance where the property would be served by an on-site septic system, that required expansion may make some sense, but in public water and sewer service areas, a physical expansion of the lot is unnecessary. For these well-settled village areas with infrastructure, and particularly for larger, historic houses that are far bigger than a modern household requires, the Town should relax those density limits – but maintain strong site and building-design control - and allow for additional units to be added.

Allow higher-density multifamily housing in Villages and as Adaptive Reuse:

The Town of Plainfield currently has one option for larger-scale multifamily housing, which is the "Garden Apartment" regulation, which requires essentially a development density that reflects the underlying zoning. In other words, while the individual housing units may be smaller, an apartment complex is required to be on such a large piece of land that it does not actually achieve a higher unit-per-acre yield. Because of the historic settlement patterns of the villages of Plainfield, such large properties are rare, and higher-density multifamily is not generally envisioned for infill properties or as an adaptive re-use option for former schools, mills, or other existing facilities. While Section 12.30 does allow for some adaptive re-use of historic properties, including for housing, most old mill properties are zoned "Industrial," which does not have a clear regulatory path forward toward housing development.

In other words, much of the historic or pre-existing multifamily developments (other than dedicated senior complexes) in Plainfield would not be easily allowed by current regulations. Particularly in areas with an established higher-concentration development context and those served by public sewer and water, the Town should consider increasing allowable development density.

In addition, while the Planned Development District regulations, while useful to promoting more flexible and creative development or redevelopment opportunities, are not allowed to be either focused on housing nor located in residential districts. In certain circumstances, such as mill re-use, a PDD could not be applied to develop as a primarily or exclusively residential development, even if that was the most appropriate use. True mixed-use proposals should be more broadly possible in Plainfield, regardless of the mix between residential and commercial.

To further promote equity, these regulation changes that allowed for broader opportunities for multifamily development could also be compelled, through the Inclusionary Zoning statute of Section 8-2i, to set aside a portion of the development as income-restricted.

Promote USDA, CHFA, and other loan programs with the Real Estate community:

One of the four major categories of “affordable housing” included on the Department of Housing’s “Affordable Housing Appeals List” is homes that have CHFA- or USDA-assisted mortgages. These programs provide mortgage and down-payment aid in such a way that first-time and lower-income homebuyers are able to afford to purchase properties that they would ordinarily not be able to acquire. Historically, a significant percentage of Plainfield’s units counted toward 8-30g fall under this category (228 of the Town’s 778 units as of 2019). There is no formal program within the Town to encourage homebuyers and home-seekers to be aware of and take advantage of these resources, or other governmental, nonprofit, or bank-based assistance programs.

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 Plainfield in their search and strengthen the Town’s ownership rates. Thus, with a relatively simple public education and outreach effort, targeted at the real estate community and using existing informational resources of USDA, CHFA, or other lender programs, the Town could encourage the use of these programs and experience an increase in this type of affordable housing.

Consider development potential of unused municipally-owned land:

Aside from infrastructure costs, the cost of the land itself is one of the most significant driver of the cost of development, and thus of housing. If increasing the availability of affordable housing in Plainfield is a recognized Town priority, one of the ways it could assist with the implementation of this priority would be to reduce the cost of land. The Town owns numerous parcels of land and has the ability to acquire additional land through tax foreclosure when conditions warrant. Certainly, most municipally-owned land has a specific purpose for municipal uses (schools, town facilities), parks, recreation land, or open space. This is not necessarily the case now or will be in the future. An inventory and analysis of town- controlled land could reveal that some of these properties hold development potential for housing.

If one or more of these properties can be identified as a potential development target, the Town could seek a private-sector partner to develop housing units for sale or rent. Because the Town could make the land available at very low or no cost, the developer can reduce overall project costs and thus reduce the housing costs of the future residents. Additionally, the Town's ownership of the property and project provides the opportunity to control important elements of scale and design so that it can ensure that the project is both accessible and appropriate to the community. Finally, as the Town considers future land acquisitions, one of the potential factors for strong consideration in weighing the merits of property should be the potential to host new housing opportunities.

Consider partnerships with land banks, nonprofits, and senior community developers:

Because the overall housing market for new development in Plainfield has been relatively quiet for the last decade, particularly for larger-scale housing development, and because the Town government lacks the resources to undertake complex housing projects unilaterally, the Town should seek to foster new partnerships. Mission-driven development groups with a focus and expertise in housing bring a wealth of information and experience and can help identify potential projects, seek funding, and otherwise be key actors in housing projects. In particular, the Town's recent support and involvement with the Eastern Connecticut Land Bank holds significant potential to facilitate the acquisition and redevelopment of underutilized, vacant, blighted, or otherwise troubled properties, turning them into community assets. Engaging with these groups will serve to amplify the Town's efforts. Plainfield could also seek to partner with other communities in Windham and New London Counties to share information and contribute to projects of mutual benefit.

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How does Plainfield
Move Forward?

ACTION	PRIMARY RESPONSIBILITY	ADDITIONAL PARTNERS	PRIORITY
Establish a Standing Housing Committee			
Joint Resolution between Board of Selectmen and Planning & Zoning Commission	Board of Selectmen	Planning & Zoning Commission	High – Year 1
Appoint Town “Housing Officer”	Board of Selectmen		High – Year 1
Establish Goals and Work Plan for Housing Officer	Board of Selectmen	Planning & Zoning Commission	High – Year 1
Ease permitting requirements and promote ADUs as a concept			
Modify Zoning Regulations to allow as-of-right ADUs	Planning & Zoning Commission	Town Planner	High – Year 1
Develop public outreach information on ADUs	Housing Officer	Planning Commission	Moderate – Year 2
Host public information forum with homeowners, builders, and realtors	Housing Officer		Moderate – Year 2
Consider incentives for income restrictions on accessory apartments			
Conduct analysis of “delta” between market rates and income-restricted rent for accessory units	Assessor	Housing Officer, Tax Collector, Board of Selectmen	Moderate – Year 2
Develop tax abatement program for 10-year restriction on accessory unit rents	Board of Selectmen	Tax Collector, Assessor	Moderate – Years 2-3
Relax requirements for middle-density housing as-of-right in certain areas, and as larger-home retrofits			
Review Zoning Regulations for opportunities to reduce additional-acreage requirements to add dwelling units in certain zones.	Town Planner	Planning & Zoning Commission	Moderate – Year 2
Develop regulations to allow for existing property retro-fit to allow for middle-density housing	Town Planner	Planning & Zoning Commission	Moderate – Year 2
Allow higher-density multifamily housing in Villages and as Adaptive Reuse			
Modify PDD regulations to allow developments to be proposed in certain residential areas and for primarily residential purposes.	Town Planner	Planning & Zoning Commission	Moderate – Year 2-3
Develop stronger Design Guidelines to ensure that higher-density development fits the established neighborhood context.	Town Planner	Planning & Zoning Commission	Moderate – Year 2-3
Modify Garden Apartment regulations to allow for higher development densities in areas of public sewer/water.	Town Planner	Planning & Zoning Commission	Moderate – Year 2-3
Promote USDA, CHFA, and other loan programs with the Real Estate community			
Develop and promote informational resources among real estate and home mortgage professionals	Housing Officer	USDA and CHFA staff	High – Year 1 and Ongoing
Consider development potential of surplus municipally-owned land			
Undertake an investigation about the conservation priorities and development potential of non-restricted municipal lands	Board of Selectmen	Housing Officer, Town Planner	Moderate – Year 2
Identify 1-2 high-potential town land holdings for redevelopment and solicit public-private development partnership	Housing Officer	Board of Selectmen, Town Planner	Moderate – Years 3-4
Consider partnerships with land banks, nonprofits, and senior community developers			
Convene partnership conversations and establish common goals.	Housing Officer	Regional partners & Town Planner	Moderate – Years 2-5
Provide leadership and financial support to the work of Eastern Connecticut Land Bank	Board of Selectmen	Town Planner	High – Year 1 and

			Ongoing
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