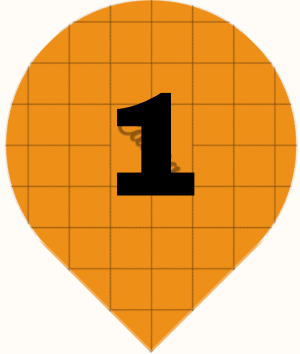


# PA 25-1: Housing Growth Plan Analysis





# OPM Must Produce Guidance

- DOH and COGs to be consulted
- Must specify formats, mapping standards, and **measures for annual reporting**
- Measures must Include:
  - **Permits issued**
  - **Certificates of Occupancy**
  - **Deed-Restricted Units, by Income**
- **VERY IMPORTANT!**





2

## OPM GIS Office develops statewide data tools for municipalities to compile an inventory of developable land

DEADLINE: July 1, 2026

- Done in partnership with COGs
- OCA Perspective: If McMansions can be built someday, so can mixed income housing
- **VERY IMPORTANT!**

### What is “developable land”?

Land that can be feasibly developed or redeveloped into residential or mixed-use development based on commercially reasonable assumptions. Not included: land used for a public purpose, open space in conservation or that can't be developed due to some other legal restriction or topography.

3

## OPM Establishes a Regional Housing Need Program

4

**DEADLINE: Dec. 1, 2026**

**OPM Develops Regional Housing Growth Targets**  
[Note: Housing need not just affordable need]

### FACTORS FOR UNIT TARGETS

- Replacement needs
- Availability of affordable and deeply affordable units
- Household formation
- Demographic changes
- **Cost burden, including for 30% median income and below households paying half or more of income towards housing**





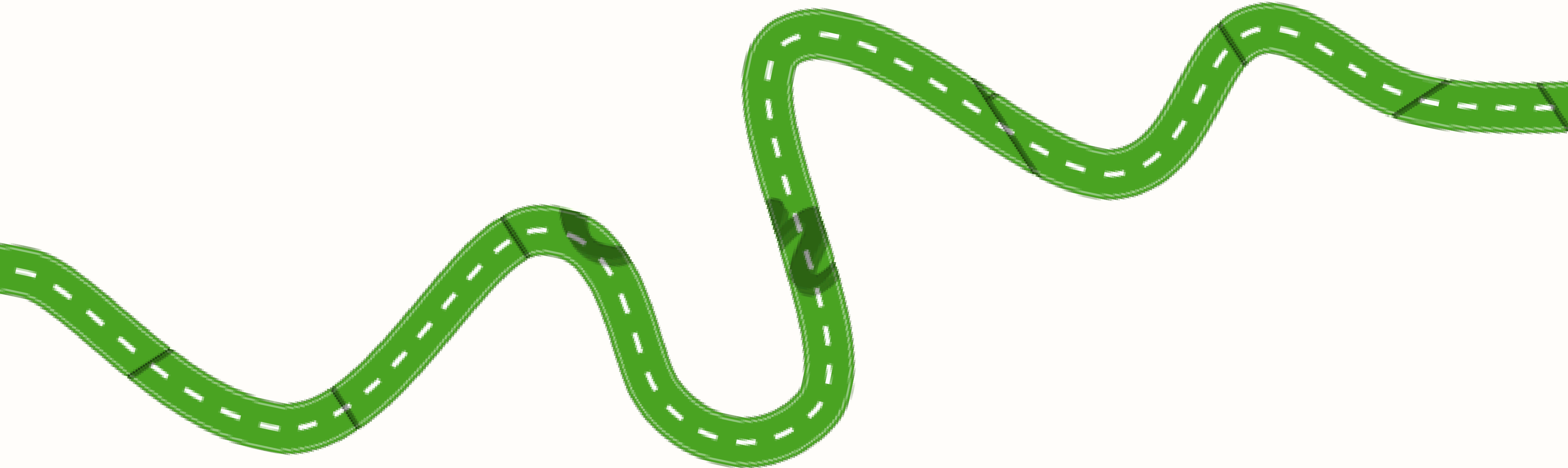
## COGs Develop Needs Assessments Establishing Affordable Housing Goals for Each Municipality, Based on OPM Growth Targets

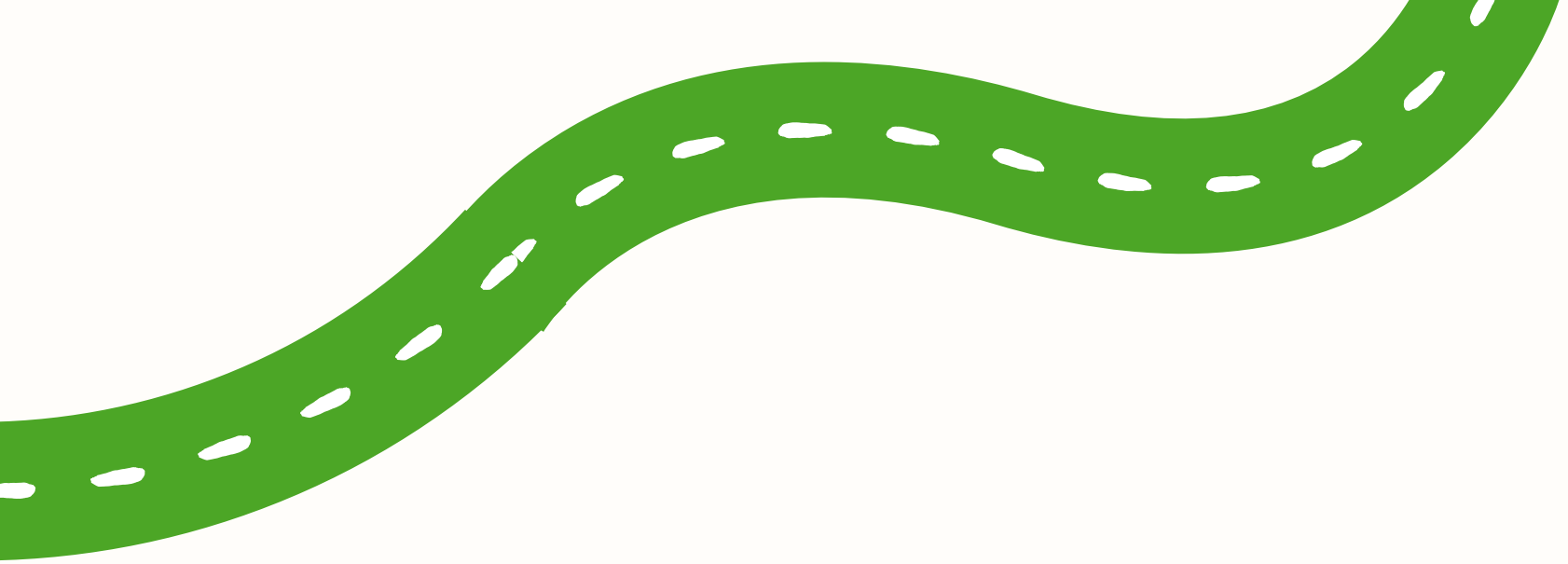
### REQUIRED METHODOLOGY

- Considers **Zoning Enabling Act** and **federal Fair Housing Act** obligations
- Availability of affordable and deeply affordable units
- Considering regional metrics like number of 30% median income or below families paying over 50% of income towards housing costs
- Adjusts allocation to **increase** for municipalities with **greater per capita income**, higher median income, lower poverty percentage, and lower percentage of multifamily housing
- No municipality can be allocated affordable units **greater than 20%** of occupied households
- Plus others



# **COG Seeks OPM Approval of Regional Housing Needs Assessment & Municipal Goals** [Sec. 6]





**OPM Approves or Rejects COG Needs Assessment & Municipal Goals**



**Municipalities Choose:**  
*(except those exempted)*

**A Municipal Growth Plan  
or  
Participation in a Regional Growth Plan**

**Exempted Twenty  
Lowest Per Capita  
Municipalities  
(as of 2023)**

- PLYMOUTH
- BROOKLYN
- STERLING
- BRISTOL
- PLAINFIELD
- TORRINGTON
- ANSONIA
- SPRAGUE
- NAUGATUCK
- NEW LONDON
- MERIDEN
- WEST HAVEN
- NEW HAVEN
- NORWICH
- EAST HARTFORD
- BRIDGEPORT
- WATERBURY
- WINDHAM
- NEW BRITAIN
- HARTFORD

9

## Municipality Accepts COG Unit Allocation

- DEADLINE: Municipalities have 30 days from COG notice of allocations to elect to participate in the regional plan

10

## COG Creates Regional Growth Plan

- Participation approved by municipal chief elected officer and Planning & Zoning Commission
- If COG submits plan to OPM it gets access to \$7 million statewide pool of funding.

11

## COG Submits Plan to OPM

12

## OPM Approves Plan

13

## Municipalities Adopt Housing Growth Policies from COG Plan



9

## Municipality Adopts Affordable Housing Goal

- Identify a target number of units, affordable at 80% median income or below
- If total is less than COG's, municipality **provides explanation** to the COG.

10

## Municipality Drafts Municipal Growth Plan

- Several required factors outlined, including:
  - Identifying specific areas that allow for summary review.
  - Consistency with existing plans.

11

COG Proposes Amendments (which can be rejected)

12

Municipality Submits to OPM

13

OPM Approves = Municipality is Eligible for \$ (if other requirements met)

# Growth Plan – Summary of Rewards

## 8–30g Moratorium–Eligible

- Municipality submits a plan, it is approved by OPM
- Does not apply for regional growth plans

*Only for towns opting for Municipal Growth Plans – Towns joining their COG plan remain eligible for a moratorium regardless*

## 5% School Construction Boost

- Municipality submits a plan
- It is approved by OPM
- Municipality demonstrates progress
- [Can also get this for qualifying as a transit community or having an agreement with the Municipal Development Authority]

## Housing Growth Program Awards

(For infrastructure associated with the development of new dwelling units)

- Municipality submits a plan
- It is approved by OPM
- Municipality demonstrates progress AND
- is a transit community OR has an MDA agreement OR something else that OPM says

There is a lot of promise in the Housing Growth Plan process, but on its face, it appears to be missing some key housing needs.

These include housing for:

- Families with children including 2+ bedrooms
- Rental housing
- Housing affordable at lower income levels



# Equity Overlay

PA 25-1 includes, and is subject to, a number of laws that ensure equity considerations are central.

These include:

- Specific requirements within 25-1 for OPM, Councils of Government, and municipalities to “**affirmatively further fair housing**,” promote economic and racial diversity, and comply with the federal fair housing laws.
- PA 25-1 also requires conformity with CT’s Zoning Enabling Act, which includes similar fair housing obligations.
- Connecticut’s Constitution includes an **anti-segregation** provision.
- CT has state **fair housing** laws.
- Federal fair housing laws include anti-discrimination and affirmatively furthering fair housing and a prohibition on “perpetuating segregation.”



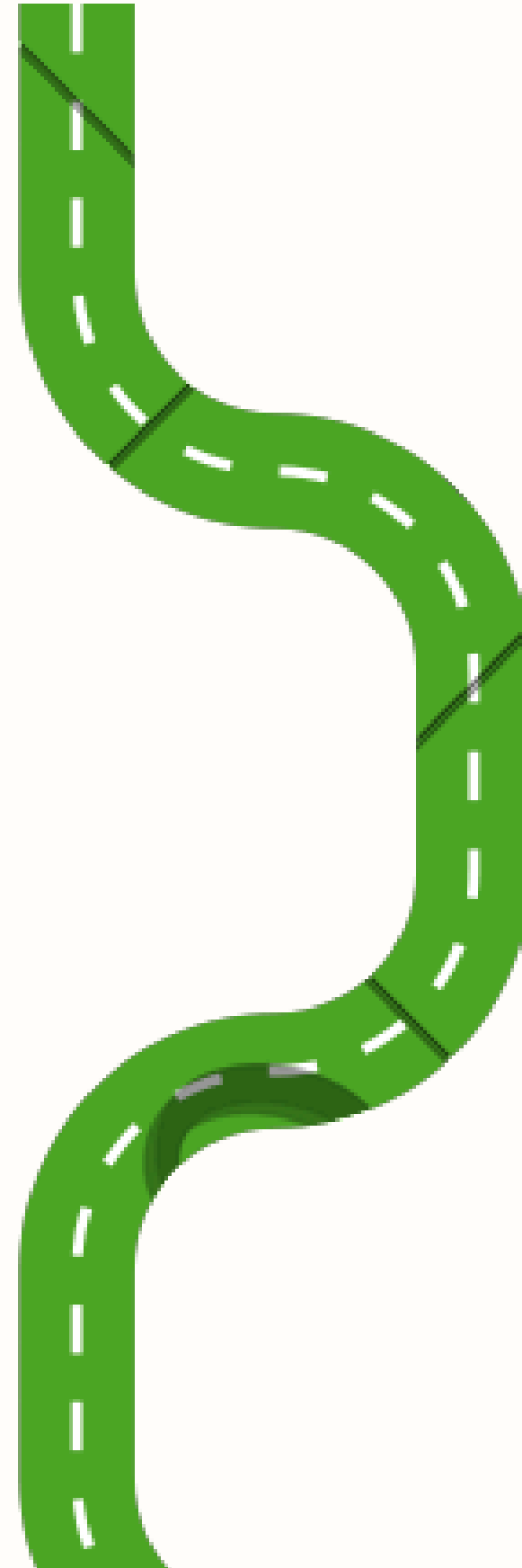
# Federal and State Fair Housing Act Protected Classes

## • Federal Fair Housing Act

- Race
- Color
- National Origin
- Religion
- Sex
- Familial Status
- Disability

## • State

- Lawful source of income
- Sexual orientation
- Gender identity and expression
- Age
- Marital status
- Veteran status
- Status as a victim of domestic violence



# What Does this Mean in Real Life?

- Black and Latino households earn half or less of white households and have a 10<sup>th</sup> or less of the wealth.
- 58% of Black households are renters compared to 24% of white households.
- Families with children and people with disabilities are protected under fair housing laws.



At each point of decision in the HGP process, OPM, COGs, and municipalities must factor in the equity impact of their plans. For example:

- Planning needs to envision housing at different income levels.
- Plans need to include rental units.
- Units with 2+ units must be included.