

# North Haven

## Overview

North Haven is a self-described “thriving suburban community in the Greater New Haven area.”<sup>41</sup> North Haven is roughly bifurcated by I-91, which connects the town to both nearby New Haven to the southeast and Hartford further to the northwest. Even though it is situated between two of the state’s largest cities, the town lacks racial and economic diversity and has few affordable units. The town’s planning and zoning policies present serious impediments to the production of diverse housing types.

## Summary of Findings

- *North Haven has far fewer Black, Hispanic and low-income households than New Haven County or neighboring municipalities like Hamden and New Haven.*
- *North Haven lacks C.G.S. § 8-30g affordable housing, with only a maximum of 1.1% of the qualifying units in town being non-age-restricted rental housing.*
- *Single-family homes are allowed as-of-right in most of town, while multifamily housing of three or more units is not allowed “as-of-right” anywhere.*
- *Even in the small areas where multifamily is allowed by special permit, density limits, unit caps, and other requirements restrict the amount of housing that can be built.*
- *Overlay zones are restricted by minimum parcel sizes and site eligibility requirements.*
- *North Haven’s planning keeps single-family and multifamily separate, with multifamily largely relegated to industrial, commercial, or other non-residential zones.*

## Demographics Overview: North Haven is racially and economically segregated, with fewer people of color and low-income households than its neighbors

Key Demographic Data	North Haven	New Haven County	Connecticut
Total Population	23,722	857,513	3,575,074
% White, Non-Hispanic	83.5%	62.9%	66.9%
% Black, Non-Hispanic	4.3%	12.5%	9.9%
% Hispanic, Any Race	5.1%	18.1%	16.1%
% Asian, Non-Hispanic	5.6%	4.0%	4.5%
% Population Below Poverty	5.0%	11.7%	9.9%
Median Household Income	\$96,598	\$69,905	\$78,444
Grand List Per Capita	\$185,065	\$117,554	\$160,428

*For data sources, see the report’s Town Data Compendium.*



That North Haven is segregated is clear from the data presented above, showing more than four-fifths of its residents are white<sup>2</sup> while 4.3% are Black and 5.6% are Hispanic.<sup>3</sup> North Haven is much whiter, less Black and Hispanic, and higher income than New Haven County and Connecticut, as shown above.<sup>4</sup> But the degree to which white households are disproportionately present while Black, Hispanic, and low-income households are absent is also put into stark relief when North Haven is compared with its neighbors to the west and south – East Haven, Hamden, and New Haven, as shown below.

Race or Ethnicity	North Haven	East Haven	Hamden	New Haven
Total Population	23,722	28,742	60,982	130,331
% White	83.5%	74.1%	55.6%	29.5%
% Black	4.3%	3.6%	24.0%	31.2%
% Hispanic	5.6%	17.3%	12.5%	31.2%
% Asian	5.1%	3.6%	5.1%	4.9%
% Below Poverty	5.0%	8.9%	8.8%	26.5%

*For data sources, see the report's Town Data Compendium.*

The differences are particularly pronounced as between North Haven and its larger neighbors of New Haven and Hamden, though comparisons to the more similarly-sized East Haven are also illuminating. North Haven is the whitest of these municipalities – *much* whiter than New Haven and Hamden, while marginally so as compared with East Haven.<sup>5</sup> While North Haven has a slightly higher Black population than also-small East Haven, it's Hispanic population is dwarfed by all three municipalities – so much so that its combined Black and Hispanic population (9.9%) is *less than half* that of fellow small town East Haven (20.9%), *less than a third* that of larger Hamden (36.5%), and less than *one-sixth* that of larger-still New Haven (62.5%).<sup>6</sup> North Haven also has a lower poverty rate than all three neighbors.<sup>7</sup> So regardless of whether the point of comparison is another small town, a larger suburb, or the city on whose periphery it lies, North Haven is clearly racially and economically segregated.

### **Housing Stock Overview: A single-family town in serious need of non-elderly rental affordable housing**

Key Housing Data	North Haven	New Haven County	Connecticut
Total Housing Units	9,583	367,053	1,516,629
% Affordable (C.G.S. § 8-30g)	5.4%	13.0%	11.7%
Median Home Value (Owned)	\$298,300	\$248,600	\$275,400
% Single-Family	84.3%	58.9%	64.3%
% Two-Family	0.7%	9.7%	8.2%
% 3-9 Units	4.2%	16.5%	14.1%
% 10-19 Units	2.1%	4.3%	3.8%
% 20+ Units	8.7%	10.0%	8.8%
% Mobile Homes	0.0%	0.5%	0.8%
2001-2017 Permits	559	21,398	117,821
% Permits Single-Family	76.6%	66.6%	68.7%
% Permits 5+ Units	18.4%	29.3%	27.5%

*For data sources, see the report's Town Data Compendium.*



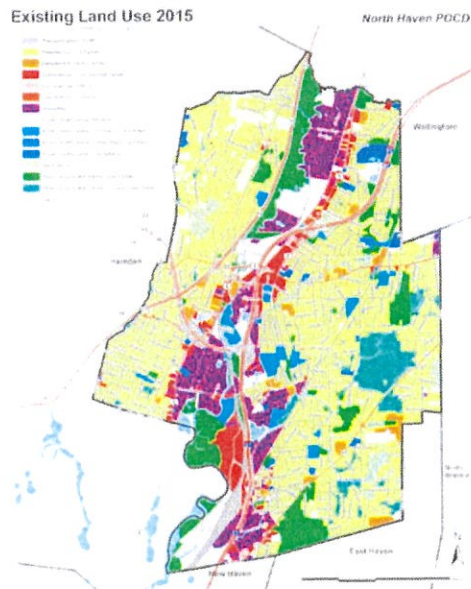
The vast majority of North Haven housing stock (84.3%) is found in single-family homes, while so-called “missing middle housing” of 2 to 9 units in a building is far below the county or state proportions, standing at 4.9% versus 26.2% in New Haven County and 22.3% in the state.<sup>8</sup> This trend has appeared to continue relatively unabated. Over the most recent 17 years for which there are data on housing construction permits (2001-2017), more than three fourths of the permits issued in North Haven were to build single-family houses.<sup>9</sup> While the town’s share of units in buildings with at least 20 dwellings is in line with the state and only somewhat lower than the analogous figure for the county,<sup>10</sup> the data make clear this is not at all a reflection of an ample supply of affordable housing units in larger developments.

To the contrary, North Haven suffers from a shortage of affordable housing, with only 5.4% of units being affordable under the Affordable Housing Land Use Appeals Procedure (C.G.S. § 8-30g), less than half as much as either the county or state.<sup>11</sup> The problem is particularly acute for low-income families and renters. Nearly 94% (321 out of 343 units) of North Haven’s “Government Assisted” C.G.S. § 8-30g affordable units are age-restricted.<sup>12</sup> Removing these and subsidized mortgages from the C.G.S. § 8-30g affordable housing supply reveals a *maximum* (since data on age-restrictions only appears to be available for the “Government Assisted” portion of the C.G.S. 8-30g supply) of 102 units that qualify as affordable under C.G.S. § 8-30g in North Haven, *or just 1.1% of all housing in town.*<sup>13</sup> (The lack of rental housing extends beyond the C.G.S. § 8-30g supply, with the homeownership piece of the town’s housing stock (81.7%) being about 20% higher than the county’s and 15% than the state’s.<sup>14</sup>)

The town is aware that a lack of housing options is an issue. A majority of respondents to a survey conducted for the town’s 2017 Plan of Conservation and Development (“POCD”) indicated that “some types of multifamily housing” were “needed to meet this need” presented by a “lack [of] affordable housing options.”<sup>15</sup> The POCD recognized that affordability would be an ongoing challenge, admitting that “North Haven is not likely to reach the 10% threshold” established by C.G.S. § 8-30g (for the share of a town’s housing units that must be affordable under that act to exempt a town from its procedure) “in the near future because of the sheer number of new or converted units that would be required.”<sup>16</sup>

### Land Area: Single-family housing dominates the landscape

North Haven’s land use is dominated by single-family homes. “Existing Land Use 2015” map from the POCD, reproduced to the right, shows (even when it is reproduced in miniature, as it is to the right) that the vast majority of town is occupied by “Residential 1-2 Family” (yellow areas), with industrial (purple), commercial retail (red), institutional (the blues), and various open space or agriculture designations (the greens) accounting for most of the rest.<sup>17</sup> The few orange patches represent the only multifamily areas, and they tend to be concentrated near major roadways.<sup>18</sup> Given how few two-family units are in town (0.7% of the housing supply),<sup>19</sup> the sea of yellow is a stark indication of the fact that North Haven is blanketed by single-family homes throughout almost all of ton other than the I-91 corridor that snakes through its center.<sup>20</sup>



Source: POCD, at 15.

## Lot Size: Large lot-sizes for single-family is the norm, with some even larger lot sizes for multifamily uses within zones that also allow for single-family homes

The largest zone by land area in North Haven appears from the zoning map to be the R-40, a single-family zone that requires a minimum lot size of 40,000 square feet, or approximately one acre per home.<sup>21</sup> The second largest zone by area seems to be the R-20, which requires about half-acre lots.<sup>22</sup> These large-lot, single-family zones seem to make up more than half of the town's land area.<sup>23</sup>

In addition to the general housing cost increases that can result from the prevalence of large-lot, single family zoning (both because such zoning increases surrounding property values and because it means less efficient use of land and therefore fewer possible units can be developed), North Haven's lot size restrictions are relevant to multifamily housing insofar as the town appears to impose more stringent requirements on such uses than it does on single-family in the same zones.

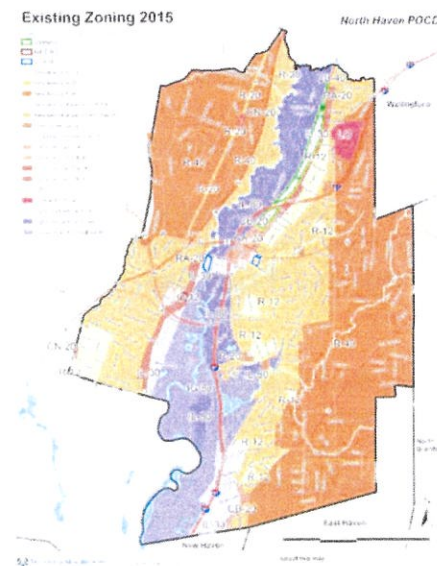
To illustrate this point, take the tiny parts of town zoned "Residence Apartment" ("RA"). For non-multifamily uses, the minimum lot size in RA-40 is 40,000 square feet, but the minimum lot size for multifamily housing is *four times* that (160,000 sq. ft.); moreover, multifamily uses in this zone require larger minimum lot widths, as well as larger front, rear, and side yards.<sup>24</sup> Similarly, the RA-20 requires 20,000 square foot lots for single-family homes, but requires *eight times* that for multifamily uses.<sup>25</sup> Throughout North Haven, the minimum lot size for multifamily ranges from about two to four acres.<sup>26</sup>

## Bureaucratic Hurdles: Residential areas are effectively single-family zones, subject to minor exceptions with little potential impact on multifamily supply

In residential districts in North Haven, which as can be seen from the POCD's "Existing Zoning 2015" map to the right, comprise the majority of town (the beige-to-rust-colored areas covering almost all of town outside of the I-91 corridor in the center that is zoned for mostly industry (purple)),<sup>27</sup> the only type of housing that is allowed to be built as-of-right (meaning without planning and zoning commission ("PZC") approval following a public hearing) is single-family housing.<sup>28</sup>

In the majority of land in these districts – the R-40 (darkest rust-colored area), R-20 (next-lighter shade of beige), and R-12 (lightest shade of beige) – the only other housing possible seems to be as follows:

- As-of-right conversion of single-family homes to two-family dwellings, but *only* if the dwelling was built "prior to 1930" and doing so would still comply with the district's density requirements;<sup>29</sup>
- Age-restricted housing operated by the Housing Authority of North Haven (requires public hearing and PZC approval);<sup>30</sup> and
- Age-restricted units in converted existing structures (same procedure).<sup>31</sup>



Source: POCD, at 17.



Thus, throughout most of town, *no non-age-restricted* multifamily can be newly constructed and the sole means for any non-elderly multifamily housing is a) limited to two-family, b) highly unlikely to be of much use given that it requires a pre-1930 unit to be available and suitable for conversion, and c) could not generate density above the governing provisions of the district, in any event (and clearly this conversion provision is little used, given the aforementioned 0.7% of units in two-family structures<sup>32</sup>).

In fact, the only as-of-right multifamily that appears to be permitted anywhere in town are two-family dwelling in the town's office districts.<sup>33</sup> That this is not a significant provision is obvious from the facts that it is only for two-family housing and only within the Office districts that make up a tiny portion of the zoning map.<sup>34</sup> Additionally, such housing would need to compete with the other permitted uses in these zones and (once again) two-family units are few and far between in North Haven<sup>35</sup> – so clearly this zone is provision has not led to a great deal of two-family units.

The "Residence-Apartment Districts" ("RA") districts in theory make it possible to build multifamily housing in residential areas, but these are only available subject to PZC approval following the applicant's submission of detailed plans for the proposal and a public hearing.<sup>36</sup> Note that these zones *only* subject a "permit for any multiple dwelling project," to these procedures, exempting the single-family uses that are permitted in the zone (and which do not even require site plan approvals).<sup>37</sup> Additionally, and perhaps most significantly, the RA zones appear from the zoning map to cover only a few (perhaps just three) extremely small areas of town.<sup>38</sup>

### ***The few non-residential zones that permit non-age-restricted multifamily also subject it to rigorous, often highly discretionary, procedures***

In the few remaining areas of town that multifamily housing is allowed, it appears to always require a highly discretionary and potentially burdensome PZC application and public hearing process. Office Apartment ("OA") zones adopt the public hearing and submission requirements imposed on multifamily in the RA zones discussed above.<sup>39</sup> The Village Center Planned Residential District ("VCPRD") imposes essentially the same conditions.<sup>40</sup>

The Commercial CA District requires PZC approval after a public hearing for "Mixed Use Districts" that require the PZC to consider such vague factors as "the effect of the proposed use on present and future dwellings" and the proposed site planning and landscaping (without more detail for guiding the review.<sup>41</sup>

Finally, the Washington Avenue Multi-Use ("UWMU") zone requires the applicant to obtain a special permit from the commission following a public hearing, and requires detailed "plans for the entire project" to be submitted with the application.<sup>42</sup> Here, too, the PZC is charged with considering subjective "standards" such as the extent to which the location, type, character, and size of the uses are in "harmony with the development of the town" and "will not hinder or discourage the development and use of adjacent lots or impair their value;" and whether the "architectural design and style of all buildings and other structures to be erected on the lot will not conflict with the architectural design and style of adjacent properties."<sup>43</sup>

## **Overlay zones upon which North Haven appears to rely to promote housing diversity impose even more onerous impediments to approval and development**

North Haven acknowledges the need for some different types of housing, which it seeks to provide largely through overlay zones.<sup>44</sup> A salient example in North Haven is the Special Development District (“SDD”) zone. According to the zoning amendments, the SDD can achieve some of the goals set forth in the POCD, “such as provision of a variety of housing types by providing for mixed use developments, [and] balancing the need for development against the preservation of the character of Town, by providing for infill development.”<sup>45</sup> But rather than facilitating use of this provision, North Haven’s zoning makes the process to establish an SDD extremely cumbersome.

For example, SDD applications must include a boundary survey by a registered land surveyor; a Stormwater Management Plan by a registered engineer, which describes impacts on the site and adjacent lots within 500 feet, and which evaluates storm events to occur within 100 years; a Traffic Impact Analysis, “together with a capacity analysis of existing streets directly affected by the proposal;” a Municipal Impact Study showing the costs and benefits to the Town; an extensive Master Plan; and a professionally prepared Shared Parking Study.<sup>46</sup> In addition to the applicant having to provide all of this technical documentation and analyses, the PZC may require that the applicant pay costs incurred by the Town to conduct *its own* independent, expert technical review of the application.<sup>47</sup>

That is only the first part of the process. In conjunction with an application to establish an SDD, the applicant must also obtain site plan approval for the proposed multifamily homes,<sup>48</sup> a requirement which is not required for single-family or two-family housing.<sup>49</sup> In this process, the Commission is required to set appropriate conditions and safeguards to achieve “a site layout that will have the minimum potential adverse effect upon the established character or potential use of any adjoining properties;” and “the reasonable screening at all seasons of the year from the view of adjacent residential properties and streets of all parking and loading areas or other features, that, in the opinion of the Planning and Zoning Commission, require such screening.”<sup>50</sup> Multifamily proposals seeking a site plan must submit documentation with extreme specificity and detail for every aspect of the development, including design elements and materials used.<sup>51</sup>

The combined effect of all of these intensive submission and review standards is to make this supposedly housing-diversity promoting provision much more burdensome and costly to pursue.

## **Site Location Limitations: Massive parcel sizes and excessive site requirements**

Among the more powerful restrictions in North Haven’s zoning codes are regulations limiting where overlay zones can go. The Medical Epicenter Elderly Residential Zone (“MEERZ”), which allows relatively dense (albeit age-restricted) housing is only possible if it is located “within 750 feet of a medical development at least 120,000 square feet in size affiliated with a CT licensed hospital, which development provides a variety of medical services;” is located within 2,000 feet of an existing wellness Center; and “public bus transportation passes along the street that provides the main access point to such Facility or unless such Facility is located within one-half mile of an existing or approved railroad station.”<sup>52</sup> Unsurprisingly, it only exists in one location in town.<sup>53</sup>

Of perhaps greater concern given that the zone is not age-restricted are the locational limits placed on the Village Center Planned Residential District (“VCPD”). The VCPD is highly constrained in its



potential locations, not only by the large minimum lot size (over five acres), but also by its requirement to have “accessibility of public transportation,” “the close proximity of churches, medical facilities and other commercial and recreational activities” and (most decisively) the fact that “such site shall be located in or within one quarter mile of a mixed use Commercial Area, considered by the Commission to be a transitional area.”<sup>54</sup>

The SDD Overlay Zone, which is intended for mixed use and housing diversity, is extremely limited in potential locations by two main factors. First, according to the Zoning Amendments, “No property that is zoned residential may be changed to the SDD zone,” and second, the SDD requires at least 40 buildable acres of land to permit a zoning change.<sup>55</sup> The elimination of residential land from consideration excludes the majority of land area in the town, and the massive lot size requirement further eliminates all but a small handful of parcels that could be developed (it also may precludes any potential developers other than large companies that can finance the purchase massive parcels), most of which likely are already occupied by commercial or industrial uses. .

### ***Density: North Haven implements an array of density limitations, including few non-age-restricted multifamily units permitted per acre or per development***

Even if a proposal were to manage to overcome the procedural barriers erected by the zoning code in the handful of small districts that allow for multifamily with PZC approval, North Haven imposes an array of density and related restrictions that would be likely to significantly inhibit multifamily and affordable housing production.

In RA-Districts, the potential for multifamily and affordable housing is circumscribed by the maximum density of eight units per acre.<sup>56</sup> Such a density seems in keeping more with suburban single-family zones and, in any event, is much less than 40 units per acre allowed for (subject to PZC approval following a public hearing) elderly housing in residential zones (based on the 80 unit parcel maximum and two-acre parcel minimum size contained in that regulation).<sup>57</sup> It is also less than the 35 units per acre allowed in the MEERZ,<sup>58</sup> and even less than the 13.5 units per acre permitted in the Elderly Housing District<sup>59</sup> – suggesting a broader policy of allowing for higher densities for age-restricted than non-age-restricted multifamily proposals.

Density is further restricted in RA zones via regulations of the style and arrangement of dwellings within multifamily structures, such as a limit of 12 units per building and a limit of one front and on rear entrance for every four units.<sup>60</sup> (RA zones also restrict the allowable building height to two stories and 35 feet and the maximum building coverage to 15-20% of the land area of a parcel.<sup>61</sup>) These building restrictions can serve to reduce the feasible density for multifamily and affordable housing to even less than the maximum of eight units per acre.<sup>62</sup>

OA zones allow for slightly more density -- up to 10 units per acre (in two very small areas on the zoning map<sup>63</sup>) – but the regulations require that the density should be reduced if there are other uses on the same lot.<sup>64</sup> This is a likely scenario in a zone that allows commercial uses, suggesting that OA multifamily proposals often will not be able to maximize their potential density.



The VCPRD goes a little higher than OA, but still not as high as the above-discussed elderly provisions, and allows up to 12 units per acre.<sup>65</sup> But this zone also imposes a per parcel density cap that cuts off any proposal from yielding more than 130 units.<sup>66</sup> (Moreover, with a minimum lot size of over five acres, the number of undeveloped parcels that could be used for multifamily in this district is probably limited.<sup>67</sup>)

Lastly, the Commercial CA District, only allows multifamily uses by special permit, and only as part of mixed-use developments, also requires a one-half acre lot size, that no residential units be on the first floor, a maximum building height of 35 feet, maximum building coverage of 25%, residential uses are limited to 50% of floor area (unless receiving a special approval by the Commission and agree to additional recommendations by the Fire Marshal), and minimum floor area requirements.<sup>68</sup> These serve as de facto limits on the density of multifamily homes.

### ***Inadequate Provisions: Stringent unit limits in zones touted as promoting housing diversity***

The Town of North Haven has seemingly pegged many of its hopes for multifamily housing development on an extremely small strip of land zoned as the Upper Washington Avenue Multi-Use (“UWMU”) and IL Upper Washington Avenue Multi-Use (“ILUWMU”) Development zones, which are located along Washington Avenue, to the north of the I-91 interchange.<sup>69</sup> According to the zoning code, “the purpose of such developments shall be to provide multifamily residential development of a destiny to meet the rising demand for that type of housing in the town.”<sup>70</sup>

Unfortunately, these zones’ potential for generating multifamily housing is diminished by several factors. First, they comprise areas of only about two parcels in width on either side of Route 5.<sup>71</sup> Second, one is zoned for commercial uses and the other for industrial uses, meaning there is likely to be competition for land from non-residential uses.<sup>72</sup> Third, residential uses are subject to several limiting requirements including a lot size minimum of three to four acres, height limits of 35 and 44 feet, maximum building coverage of 35% of the lot, and bedroom limits of two per dwelling unit, that severely inhibit the viability of dense multifamily.<sup>73</sup> Perhaps most directly, the overall number of units in the UWMU area is capped at 300 and in the ILUWMU it is capped at 150.<sup>74</sup> An inclusionary zoning provision in the ILUWMU zone requires that 10% of units must be deed restricted as affordable, however, with the total dwelling units capped at 150 in this zone, this provision, if used at all is likely to only add 15 total affordable units to the Town’s total.<sup>75</sup>

### ***Dimensional Restrictions: Buffer requirement for some multifamily zones reflect a planning approach that keeps multifamily separate from single-family***

The UWMU zone, which comprises a narrow strip along the Route 5 corridor abutting single-family residential districts to the East, requires extensive measures to ensure separation of its potential multifamily uses from the single-family uses next door. Multifamily developments must provide a 25-foot buffer strip alongside lot lines and a 50-foot strip along rear lot lines if adjacent to residential property.<sup>76</sup> This language suggests that the town may not consider multifamily to be akin to a residential use. Further, the landscaping must be dense evergreen and of a height, type and spacing that is approved by the PZC so as to screen multifamily uses from residential zones throughout the year.<sup>77</sup> The PZC can also require a fence and “may hire a landscape consultant to evaluate the proposed buffer(s) at the expense of the applicant.”<sup>78</sup> These and other regulations make clear that multifamily housing must make every concession to ensure that it does not impact single-family uses.

## Conclusion

The Open Communities Alliance has estimated that North Haven must facilitate the construction of more than 1,800 affordable housing units in the next ten years in order to meet its “fair share” of the regional need for such housing.<sup>79</sup> Given the many restrictions they impose, it does not appear to be possible to achieve this goal with the current planning and zoning policies in place in North Haven.

North Haven 10-Year "Fair Share" Allocation (Units)	South Central Region "COG" <sup>80</sup> 10-Year Regional Need Estimate (Units)
1,812	25,889

*For data sources, see the report's Town Data Compendium.*

<sup>1</sup> Town of North Haven 2017 Plan of Conservation and Development (“POCD”), effective Sept. 1, 2017, at 4, a link to which is provided in the “Core Planning and Zoning Documents for 12 Towns” section of this report, at 31.

<sup>2</sup> All references to racial groups in this analysis are shorthand for “non-Hispanic” members of that group.

Conversely, all references to “Hispanic” are meant to capture Hispanics of any race.

<sup>3</sup> See Town Data Compendium, a link to which is provided in the “Core Planning and Zoning Documents for 12 Towns” section of this report, at 31.

<sup>4</sup> See *id.*

<sup>5</sup> See *id.*

<sup>6</sup> See *id.*

<sup>7</sup> See *id.*

<sup>8</sup> See *id.*

<sup>9</sup> See *id.*

<sup>10</sup> See *id.*

<sup>11</sup> See *id.*

<sup>12</sup> See *id.*

<sup>13</sup> See *id.*

<sup>14</sup> See *id.*

<sup>15</sup> POCD, at 9.

<sup>16</sup> *Id.* at 10.

<sup>17</sup> See *id.* at 15 (featuring “Existing Land Use 2015” map).

<sup>18</sup> See *id.*

<sup>19</sup> See Town Data Compendium.

<sup>20</sup> See POCD, at 15 (featuring “Existing Land Use 2015” map).

<sup>21</sup> See Zoning Code, at § 2.1.1.9. See also Town of North Haven Zoning Map, a link to which is provided in the “Core Planning and Zoning Documents for 12 Towns” section of this report, at 31.

<sup>22</sup> See *id.*

<sup>23</sup> See Zoning Map.

<sup>24</sup> See Zoning Code, at §§ 2.3.2.1 and 2.3.2.2.

<sup>25</sup> See *id.*

<sup>26</sup> See *id.*

<sup>27</sup> See POCD, at 17 (containing “Existing Zoning 2015 Map”). See also Zoning Map. The Town’s zoning map available online is accessed through a third-party digital mapping service, and is less easy to read than the POCD’s land use map. The maps are largely consistent with one another.

<sup>28</sup> See Town of North Haven Zoning Regulations (“Zoning Code”), effective Mar. 1, 2007, at §§ 2.1.1.1 (listing “One-family dwellings” as permitted uses without any further requirements) and 2.1.1.5 (providing for a select few other residential uses to be developed, but only “when specifically approved by the Planning and Zoning Commission



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after a public hearing”), a link to which is provided in the “Core Planning and Zoning Documents for 12 Towns” section of this report, at 31.

<sup>29</sup> *Id.* at § 9.1.13.

<sup>30</sup> *See id.* at §§ 2.1.1.5(l).

<sup>31</sup> *See id.* at §§ 2.1.1.5(m).

<sup>32</sup> *See* Town Data Compendium.

<sup>33</sup> *See* Zoning Code, at § 3.2.1.2.

<sup>34</sup> *See* Zoning Map.

<sup>35</sup> *See* Town Data Compendium.

<sup>36</sup> *See* Zoning Code, at § 2.2.1.2(n).

<sup>37</sup> *Id.* *See also id.* at §§ 2.2.1.1 (allowing for any use permitted in the general residence districts in the RA zones), 2.1.1.1. (permitting single-family housing in the residence districts) and 10.1.1.2 (exempting single-family and two-family proposals from the zoning code’s site plan approval requirements).

<sup>38</sup> *See* Zoning Map.

<sup>39</sup> *See* Zoning Code, at § 2.3.1.3.

<sup>40</sup> *See id.* at § 6.1.1.9.

<sup>41</sup> Town of North Haven Zoning Regulation Amendments April 2007 – February 2015 (“Zoning Amendments”), at Amendment 6, §4.3.4.2, available at <https://cms3files.revize.com/revize/northhavenct/Document%20Center/Government/Town%20Departments/Land%20Use/LND20160106AmendmentsApril2007-February2015.pdf>.

<sup>42</sup> *See id.* at Amendment 8, §4.4.1.38.10.

<sup>43</sup> *Id.* at Amendment 8, § 4.4.1.38.11.

<sup>44</sup> *See* POCD, at 10 (recommending that the town “provid[e] for a greater variety of housing options as part of mixed use development areas”). *See also* definition of overlay zones in “Zoning 101” portion of the introduction to this report, *supra*, at 20.

<sup>45</sup> Zoning Amendments, at Amendment 1, § 6.2.1.

<sup>46</sup> *Id.* at Amendment 1, §§ 6.2.3.1(1), 6.2.3.1(2)b, and 6.2.3.1(3)-(6).

<sup>47</sup> *See id.* at Amendment 1, § 6.2.6.2.

<sup>48</sup> *See id.* at Amendment 1, § 6.2.3.2(1).

<sup>49</sup> *See* Zoning Code, at § 10.1.1.2.

<sup>50</sup> *Id.* at §§ 10.1.2, 10.1.2.2, 10.1.2.4.

<sup>51</sup> *See id.* at §§ 10.1.3.1 through 10.1.3.30.

<sup>52</sup> Zoning Amendments, at Amendment 9, §2.4.1.3(n).

<sup>53</sup> *See* Zoning Map.

<sup>54</sup> Zoning Code, at §6.1.1.11.

<sup>55</sup> Zoning Amendments, at Amendment 1, § 6.2.5.1.

<sup>56</sup> *See* Zoning Code, at § 2.3.2.2.

<sup>57</sup> *See id.* at § 2.1.1.5(l).

<sup>58</sup> *See id.* at § 2.4.1.3(a).

<sup>59</sup> *See id.* at § 2.4.1.1(a).

<sup>60</sup> *See id.* at § 2.2.1.2.

<sup>61</sup> *See id.*

<sup>62</sup> *See id.* at § 2.2.1.2(j).

<sup>63</sup> *See* Zoning Map.

<sup>64</sup> *See* Zoning Code, at § 2.3.2.2(a).

<sup>65</sup> *See id.* at § 6.1.1.1.

<sup>66</sup> *See id.* at § 6.1.1.3.

<sup>67</sup> *See id.* at § 6.1.1.1.

<sup>68</sup> *See* Zoning Amendments, at Amendment 6, §§ 4.3.4.3(a) to (c), and 4.3.4.3(f).

<sup>69</sup> *See id.* at Amendment 8, §§ 4.4.1.38 and Amendment 11, 5.1.3.16.

<sup>70</sup> *Id.*

<sup>71</sup> *See* Zoning Map.

<sup>72</sup> *See id.*

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<sup>73</sup> See Zoning Amendments, at Amendment 8, §4.4.1.38.1.

<sup>74</sup> See *id.* at Amendment 11, §5.1.3.16.3.

<sup>75</sup> See *id.* at Amendment 11, §5.1.3.16.13.

<sup>76</sup> See *id.* at Amendment 8, § 4.4.1.38.9.

<sup>77</sup> See *id.*

<sup>78</sup> *Id.*

<sup>79</sup> See Town Data Compendium.

<sup>80</sup> “COG” is shorthand for “Council of Governments.” There are 9 COGs in Connecticut, which are meant to serve as “planning regions” to “provide a geographic framework within which municipalities can jointly address common interests.” See State of Connecticut, *Regional Councils of Government (COGs) in Connecticut*, available at <https://portal.ct.gov/OPM/IGPP-MAIN/Responsible-Growth/Regional-Planning-Organizations-RPO>.