

Resolution 2025-R-98

BE IT RESOLVED by the President and Board of Trustees of the Village of Northbrook, County of Cook and State of Illinois, THAT:

A Resolution Adopting Amendments to the Village of Northbrook Affordable Housing Plan (2020)

is hereby adopted, as follows:

Section 1. RECITALS

The Village of Northbrook recognizes the need to provide affordable housing to low-to-middle income households in order to increase housing opportunities for a diverse population and to provide housing in the Village. Without intervention, the trend toward increased housing prices will result in an inadequate supply of affordable housing, which will have a negative impact upon the ability of local employers within the Village to maintain an adequate local work force and will otherwise be detrimental to the public health, safety, and welfare of the Village and its residents. Since the remaining land appropriate for new residential development within the Village is limited, it is essential that a reasonable proportion of such land be developed into housing units affordable for low-to-middle income households and working families.

On December 8, 2020, the Village Board of Trustees adopted Resolution 2020-R-148, approving the Village of Northbrook Affordable Housing Plan (“**Affordable Housing Plan**”). Since that time, the Village has taken many steps to actively promote an increase in the supply of affordable housing in the community in accordance with the Affordable Housing Plan.

The President and the Village Board of Trustees have determined that it is in the best interest of the Village and its residents to adopt updates and amendments to its Zoning Code, Comprehensive Plan, Municipal Code, as well as the Affordable Housing Plan to actively support the development and preservation of affordable housing in the Village. Village staff has determined that amending the Affordable Housing Plan to summarize these efforts and establish goals and guidelines (collectively, “**Amendments**”) would further these efforts.

The Housing Committee of the Board of Trustees held a public hearing on June 3, 2025 to consider the Amendments and found the proposed plan to be appropriate and recommended approval of the Amendments to the Board of Trustees.

The President and Board of Trustees have determined that it will be in the best interest of the Village and its residents to adopt the Amendments in the form set forth in this Resolution.

Section 2. ADOPTION OF AMENDMENTS

Amendments to the Affordable Housing Plan are hereby approved and adopted in the form attached to, and by this reference made a part of, this Resolution as **Exhibit A**.

Section 3. AUTHORIZATION

The Village Manager is directed to submit a copy of this Resolution and the Amendments to the Illinois Housing Development Authority on or before June 14, 2025.

Section 4. EFFECTIVE DATE

This Resolution shall be in full force and effect after its passage and its approval in the manner provided by law.

Approved: 06/10/25

RESULT:	APPROVED [5 – 0]
MOVER:	Matt Cassidy, Trustee
SECONDER:	Robert Israel, Trustee
AYES:	Israel, Ross, Ebhomielien, Kohler, Cassidy
NAYES:	None
ABSTAIN:	Kathryn Ciesla, President
ABSENT:	Johannah Hebl, Trustee

/s/ Kathryn Ciesla

Village President

ATTEST:

/s/ Derek Gau
Village Clerk

VILLAGE OF NORTHBROOK
AFFORDABLE HOUSING PLAN
(as Amended by Resolution No. 2025-R-xx)

I. AUTHORITY

In 2003, the Illinois General Assembly adopted Public Act 93-0595, the Affordable Housing Planning and Appeals Act, which became effective January 1, 2004. Amendments to Public Act 93-0595 have been approved several times, most recently with an effective date of January 1, 2024 were approved on June 28, 2004. Public Act 93-0595 and its amendments are codified at 310 ILCS 67/1 et seq. ("Act"). According to the Act, its purpose is to encourage counties and municipalities to incorporate affordable housing within their housing stock sufficient to meet the needs of their county or community. In addition, the Act provides a forum for affordable housing developers who believe they have been unfairly treated to seek relief from local ordinances and regulations. 310 ILCS 67/10.

The Act contains three major provisions: (1) the Illinois Housing Development Authority ("IHDA") has been charged with determining those local governments that must prepare an affordable housing plan and those that are exempt; (2) the Act requires all non-exempt local governments to prepare affordable housing plans and adopt those plans prior to June 14, 2025 April 1, 2005; and (3) the Act provides an appeal procedure for aggrieved developers of affordable housing.

On April 17, 2024 August 10, 2004, IHDA sent a letter to the Village of Northbrook informing the Village that it was a non-exempt community pursuant to Section 20(b) of the Act. ~~However, because the Act did not preempt home rule authority, it is our opinion that the Act does not apply to the Village, a home rule municipality, for the reasons set forth below.~~

~~The Illinois Constitution sets forth three specific methods for the State to preempt home rule powers. First, the General Assembly may expressly preempt home rule authority by a three-fifths vote (Ill. Const., Art. VII, Sec. 6(g)). The Illinois Supreme Court has held that the mere fact that the General Assembly passes a law relating to the powers of municipalities generally does not mean that the law restricts home rule power—instead, the General Assembly must include an explicit statement that it intends to restrict the powers of home rule municipalities. See *Seadron v. Village of Des Plaines*, 153 Ill. 2d 164, 187 (1992) (quoting *Rozner v. Korshak*, 55 Ill. 2d 430,~~

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~~435 (1973)). The Act does not contain any explicit home rule preemption.~~

~~Second, the General Assembly may specifically provide for the State to exercise a power exclusively (Ill. Const., Art. VII, Sec. 6(h)). Under this Section, the General Assembly must make an express statement that the subject is one of purely statewide interest. See *Schillerstrom Homes, Inc. v. Village of Naperville*, 198 Ill. 2d 281, 291 (2001). The Act does not contain any express statement that affordable housing is purely a statewide interest. Moreover, the State has not exercised authority exclusively over affordable housing under the Act. Rather, the Act requires each non-exempt local government to establish its own plans and policies for achieving levels of affordable housing that will vary among communities based on decisions that communities will make locally. Such a legislative structure is not consistent with the type of exclusivity that courts have recognized as triggering a home rule preemption.~~

~~Third, Article VII, Sec. 6(i) of the Illinois Constitution provides that home rule units may exercise powers and perform functions concurrently with the state, "to the extent that the General Assembly by law does not specifically limit the concurrent exercise or specifically declare the State's exercise to be exclusive." The Act does not specifically limit local governments' concurrent exercise or specifically declare the State's exercise to be exclusive. To the contrary, as noted above, the Act calls for local exercise of authority and discretion in establishing plans and implementing regulations relating to affordable housing.~~

~~Based on the foregoing, the Act does not preempt the Village's home rule powers and, therefore, does not apply to the Village.~~

II. INTENT

~~in Section I of this plan, because the Village is a home rule community, the Village is neither required to comply with the Act nor adopt an affordable housing plan. However, The Village recognizes the importance of providing opportunities for additional affordable housing and therefore has determined that it is in the best interests of the Village and its residents to adopt this plan, which will follow the requirements of the Act. However, the Village recognizes that there are areas of uncertainty regarding the interpretation of various provisions of the Act, including those dealing with local land use decisions and possible loss of local control over those decisions. The Village's intent is that adopting this Plan is in the Village's best interest and that decisions regarding its housing needs and future development continue to be made at the Village level.~~

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The Village has ~~been a leader~~ a long history in the area of fair and affordable housing, having adopted one of the first fair real estate practices ordinances in the northern suburbs in 1968 (Ordinance No. 68-29). In the early 1980s, the Village issued bonds to finance and establish an affordable housing complex for senior citizens in an unused public school building. Owned and operated by the Village, Crestwood Place contains 117 rental apartments that include studios, one bedroom and two bedroom units with current monthly rents in the range of \$392602 to \$651711. In December 2020 the Village Board unanimously passed an Inclusionary Affordable Housing Plan requiring larger new developments to include 15% affordable housing units. Northbrook's Plan received formal recognition through an award by Open Communities and has supported and shared its experience with ~~is being considered as a benchmark by~~ neighboring municipalities considering the adoption of affordable housing ordinances.

. The Village also has two standing public bodies commissions, the ~~Industrial and Commercial Development~~ Plan Commission and the recently created Housing Committee of the Board of Trustees ~~Community Relations~~ Commission that have studied the issue of affordable housing and provided direction for the Village to promote affordable housing ~~prior to the adoption of the Act~~.

It is with this history that the Village of Northbrook affirms its commitment to addressing the housing needs of low- to moderate-income households in order to increase opportunities for a diverse population and to diversify ~~provide housing options within~~ ~~for those who live or work in the Village~~. Recognizing the broader importance of providing housing for all including affordable housing throughout the State of Illinois, Northbrook is taking steps to contribute to this vital effort within our own community.

~~Northbrook is a substantially landscaped community predominated by detached single-family residences, open green space, parks, and recreational lands. Beyond the single-family and open space there are areas of commercial and office development along Skokie Boulevard,~~

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~~Waukegan Road, and Dundee Road, as well as Northbrook Court Shopping Center on Lake-Cook Road and a downtown business district that is centrally located in the Village. The developed portions of the Village are relatively low-profile buildings when compared to the existing tree canopy found throughout much of the Village.~~

~~The Village's infrastructure has historically developed in a manner consistent with the character and environment of the Village in order to protect the health and safety of its residents. In particular, streets, water lines, sanitary sewers, and storm water management facilities have been designed and maintained to accommodate the relatively low-density development in the Village. Similarly, the Village's public works and public safety services and equipment have been developed, acquired, and maintained to address the public health and safety needs that have arisen from the aforementioned character and environment of Northbrook. Establishing affordable housing in a manner inconsistent with such character will be detrimental to the Village's environment and put at risk the public health and safety.~~

It is within this context that the Village has prepared this plan. The overall objective of the Village and this Plan is to identify locations for, and to undertake steps to promote and require, affordable housing.

III. ADOPTION SUMMARY OF 2005 ADOPTED 2020 AFFORDABLE HOUSING PLAN AND IMPLEMENTATION MEASURES PROGRESS

On December 8, 2020, the Village Board of Trustees adopted Resolution No. 20-R-148 approving the Village of Northbrook Affordable Housing Plan.

On March 22, 2005, the Village Board of Trustees adopted Resolution 05-R-21, approving the Village of Northbrook Affordable Housing Plan (the "2005 Affordable Housing Plan"). Since that time, the Village has taken many steps to promote and require an increase in the supply of affordable housing in the community in accordance with the ~~2005~~ 2020 Affordable Housing Plan.

Following the adoption of the ~~2005~~ 2020 Affordable Housing Plan, the Village took a number of actions to encourage an increase in the Village's supply of affordable housing.

A. Northbrook Zoning Code Amendment. The most noteworthy land use and policy document adopted by the Village following the adoption of the 2020 Affordable Housing Plan was the adoption of Ordinance No. 2020-49 An Ordinance Amending the Northbrook Zoning Code (1988) Regarding Affordable Housing (this document, and all other approved documents pertaining to affordable housing, can be found at

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www.northbrook.il.us/affordablehousing). This amendment created a new Article in the Zoning Code titled “Affordable Housing in New Developments” which outlined the following purpose and intent:

The Affordable Housing standards in this Part are established for the purposes of implementing the goals, objectives and policies of the Northbrook Comprehensive Plan and the Village's Affordable Housing Plan. These standards are intended to promote the public health, safety, and welfare of the existing and future residents of Northbrook by requiring certain residential developments or mixed-use developments which contain a residential component to incorporate a specified percentage of dwelling units to be priced affordably for households with incomes at or below 120% of the Area Median Income (AMI), or to utilize other mechanisms that will promote affordable housing opportunities in the Village.

The Village recognizes the need to provide affordable housing to low-to-middle income households in order to increase housing opportunities for a diverse population. Without intervention, the trend toward increased housing prices will result in an inadequate supply of affordable housing, which will have a negative impact upon the ability of employers within the Village to maintain an adequate local workforce and will otherwise be detrimental to the public health, safety, and welfare of the Village and its residents. Since the remaining land appropriate for new residential development within the Village is limited, it is essential that a reasonable proportion of such land be developed into housing units affordable for low-to-middle income households and working families.

Within the adopted Article, additional details included the applicability of the required affordable housing to apply to all developments with the addition of, or containing, 6 or more residential dwelling units. The Article excludes any development resulting in 5 or fewer residential units, assisted living facilities, and nursing facilities, but does include senior independent living facilities. The regulations also allow for a fee-in-

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lieu to be paid for all required affordable units in a governed development consisting solely of 19 or fewer single-family detached dwelling units, or when approved by the Board of Trustees for other governed developments if the Board determines that such a payment will create affordable housing opportunities in the Village to an equal or greater extent than through the inclusion of affordable units in the governed development. The Article also outlines the incentives provided for development of affordable housing units which is noted later in this plan. Lastly, it should be noted that the ordinance accounts for inclusionary housing at various affordability levels not to exceed 120% AMI as noted in the ordinance excerpt below.

Affordable Rental Units	Proportion of Included Units	Eligible Income Tier	Maximum Rent Prices for Eligible Income Tiers
	At least 1/3 (33.33%)	Tier A: Households with income less than 50% of AMI	Attainable to household with income equal to 45% AMI
	At least 1/3 (33.33%)	Tier B: Households with income equal to or greater than 50% AMI but less than 80% AMI	Attainable to household with income equal to 65% AMI
	No more than 1/3 (33.33%)	Tier C: Households with income equal to or greater than 80% AMI but not exceeding 100% AMI	Attainable to household with income equal to 80% AMI
If three or less units offered	100%	Households with income less than 80% AMI	Attainable to household with income equal to 65% AMI
Affordable Owner-Occupied Units	Proportion of Included Units	Eligible Income Tier	Maximum Purchase Price for Eligible Income Tiers
	1/2 (50%)	Tier 1: Households with income less than 80% AMI	Attainable to household with income equal to 65% AMI
	1/2 (50%)	Tier 2: Households with income equal to or greater than 80% AMI but less than 120% AMI.	Attainable to household with income equal to 100% AMI

B. 2020 Northbrook Comprehensive Plan Amendments. The Comprehensive Plan was amended to include language specific to affordable housing in several sections of the Plan. Examples of the language added to the Comprehensive Plan includes:

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- Examine opportunities to establish funding sources to help implement the affordable housing programs.
- Establish programs to preserve and protect our existing supply of affordable housing in the community.
- Establish standards for increasing the supply of affordable housing in new development [and redevelopments].
- Ensure the Fair Housing Act standards [which prohibits discrimination because of race, color, national origin, religion, sex, familial status, and disability. In addition, a variety of other federal civil rights laws, including Title VI of the Civil Rights Act, Section 504 of the Rehabilitation Act, and the Americans with Disabilities Act, prohibit discrimination in housing and community development programs and activities] are enforced so that Northbrook remains a community that is home to residents of all religious, ethnic and socio-economic groups, as well as those with disabilities.

2010 Northbrook Comprehensive Plan. The most noteworthy land use and policy document adopted by the Village following the adoption of the 2005 Affordable Housing Plan was the new Comprehensive Plan, adopted in December 2010. The 2010 Comprehensive Plan is intended to establish a long-term vision of the community and a series of policies and programs for achieving that vision. The Comprehensive Plan includes a series of chapters (elements) that focus on different aspects of the community. The Northbrook Comprehensive Plan includes twelve (12) overall community goals to guide the land use and planning efforts of the community. The Comprehensive Plan established twelve (12) overall goals for the community. Of those twelve goals, five pertain most directly to housing and are listed below:

- Maintain the Character of Our Neighborhoods. Northbrook will continue to be a community comprised of attractive, safe and active residential neighborhoods. Recognizing that Northbrook is largely a "built-up" community, the Village will continue to monitor the effectiveness of its zoning, building and property maintenance standards.

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- ~~Celebrate the Community's Diversity.~~ The Village of Northbrook will celebrate its cultural, religious and social diversity, maintain its diverse housing stock, and recognize the responsibility we have to improve the community for future generations.
- ~~Maintain our Economic Diversity and Vitality.~~ The Village will continue to be a major employment and retail center for the northern suburbs of the Chicago region. We will strive to maintain a strong and diverse tax base by actively working with the business community to retain existing businesses and attract new businesses that are consistent with the character of the community.
- ~~Encourage Redevelopment of Key Areas in the Village.~~ Northbrook will continue to grow modestly over time with changes occurring in selected redevelopment areas. This redevelopment will be in concert with the overall vision of the Comprehensive Plan, which encourages a compatible, logical and efficient land use pattern that has adequate public facilities to support new growth.
- ~~Formulate Regional Solutions to Regional Issues.~~ Northbrook will continue to be a leader in promoting regional solutions to problems that affect the greater Northbrook area such as air and water pollution, affordable housing, storm drainage and major transportation system components by fostering regional coordination and partnerships.

Furthermore, the Neighborhoods, Housing and Community Diversity Element of the 2010 Comprehensive Plan focuses specifically on the Village's housing needs and the desire to maintain quality neighborhoods. Most of the goals established in this Element (each having a NH preface) deal directly or indirectly with housing. Furthermore, specific strategies intended to help achieve the specific goal are also enumerated. All of the goals and strategies for this Element are listed below (with those goals most directly related to affordable housing highlighted).

NH 1. Provide housing that meets the needs of the entire population of Northbrook

- a. Review and refine as needed the specific recommendations of the Village's 2005 Affordable Housing Plan.
- b. Review and amend as needed the Comprehensive Plan, land use and development regulations, Capital Improvement Plan and Annual Budget to implement the goals of the Village's Affordable Housing Plan.

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- c. Work cooperatively with agencies, private developers and non-profit organizations to locate housing in Northbrook intended to serve Northbrook's special needs populations.
- d. Promote zoning regulations which allow a variety of residential densities and housing types with appropriate setbacks, height restrictions and related development standards.
- e. Consider options for development of new and innovative housing styles and other creative responses to Northbrook's housing needs for affordability, variety, and housing that is appropriate for different ages and family types.
- f. Monitor other housing "indicators" such as average sales prices of housing units, percentage of owner occupied units, homeownership rates, demographic data, foreclosure activity, and property maintenance and zoning violations in order to help monitor the quality of life in Northbrook and address emerging problems before they have a detrimental impact on any neighborhood.

NH 2. Support on-going property maintenance efforts to sustain neighborhood vitality, value, and overall sense of community pride.

- a. Continue an active property maintenance inspection and code enforcement program in partnership with the community to maintain our high quality neighborhoods.
- b. Regularly review Village Zoning and Municipal Code requirements to ensure that they properly address emerging issues associated with the protection of public and private property and the health, safety and welfare of Northbrook residents, businesses and visitors.

NH 3. Encourage an increase in the supply of housing in the vicinity of shopping and mass transit opportunities.

- a. Encourage property owners to develop mixed-use developments with a residential component in the Downtown area.
- b. Consider the merits of encouraging Transit Oriented Development in the vicinity of the downtown and Lake Cook Road stations.
- c. Review development standards to ensure they that allow appropriate levels of new housing units, while protecting the character of adjacent neighborhoods.

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NH 4. ~~Examine the Village Codes to remove any unnecessary obstacles to the improvement of our existing housing stock.~~

- a. ~~Recognize that most of the future housing development that occurs in the Village will be “infill” in nature. New development should not detract from the quality and character of surrounding neighborhoods.~~
- b. ~~Ensure that the Zoning Code and other land development regulations allow existing residential areas to evolve and revitalize in accordance with community needs, while maintaining the character of the community.~~

NH 5. ~~Encourage land development patterns and site/landscape designs to ensure that infill development does not detract from the quality and character of surrounding neighborhoods.~~

- a. ~~Consider amendments to the Zoning Code and other land development regulations that promote high quality site designs that also protect important natural features and are compatible with nearby established neighborhoods.~~
- b. ~~Protect existing neighborhoods from the encroachment of incompatible land uses and public facilities.~~
- c. ~~Maintain a mix of housing options for Northbrook residents in a manner that blends with the character of the surrounding community.~~
- d. ~~Ensure that new development is consistent with Village and applicable neighborhood goals and policies, including but not limited to site standards, landscaping requirements, building design guidelines, and affordability.~~

NH 6. ~~Maintain an ongoing commitment to promoting an understanding of, and appreciation for the cultural, religious and racial diversity of Northbrook.~~

- a. ~~Cooperate with community organizations in offering events and activities that actively involve and bring together diverse groups of residents and create a strong sense of community identity.~~
- b. ~~Continue to sponsor and promote events and activities that celebrate cultural diversity within Northbrook.~~

~~Other Elements of the Northbrook Comprehensive Plan, most notably the Land Use section, build upon these goals and strategies. Although the Northbrook Comprehensive [added text **bold and double underlined**; deleted text ~~struck through~~]~~

plan is an official planning document for the Village, its policies and programs are not mandates. They are intended to help guide the decision making process for the community.

C. Establishment of an Affordable Housing Trust Fund. The Village Board also approved establishment of an Affordable Housing Trust Fund which collects money received from the Demolition Tax that became effective January 1, 2021, as well as funds received when a developer is required to pay a fee-in-lieu of constructing affordable housing units. The purpose of the fund is:

The purposes of the Affordable Housing Trust Fund are to provide financial resources to address the affordable housing needs of individuals and families of low-to-middle income by promoting, preserving, and producing long-term affordable housing; provide housing-related services to eligible households, and provide support for not-for-profit organizations that actively address the affordable housing needs of eligible households. The Affordable Housing Trust Fund will provide financial support for a wide variety of eligible activities that serve eligible households.

The language adopted in the Municipal Code pertaining to the Affordable Housing Trust Fund also details the sources of revenue for the fund, as well as distribution requirements which are controlled by the Board of Trustees. Finally, the fund includes language for eligibility requirements to use of funds as well as noting the types of activities which would be eligible for funds, and the review process that accompanies the requests for use of funds.

Following the adoption and implementation of the 2020 Affordable Housing Plan and the adoption of the additional code amendments the Village has received \$665,534.00 of funds in the Affordable Housing Trust Fund, as well as construction of 5 affordable rental townhomes, and final zoning approval for construction of a 48 unit affordable and supportive apartment building located within the downtown area of Northbrook in proximity to public transit. Lastly, the Village also approved the concept planned development for an age restricted townhome development which will include 8 affordable for sale townhomes.

In addition to the development projects approved, and funds received as noted above, the Village is also in the process of entering into an agreement to

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participate in a Community Land Trust to begin the process of acquiring scattered site permanent affordable housing units throughout the community.

~~Northbrook Zoning Code. In an effort to promote more affordable housing units in the Village and achieve some of the objectives of the Affordable Housing Plan and the Comprehensive Plan, the Village has adopted several specific Zoning Code amendments.~~

- ~~1. Density Bonus for Senior Living in R-7 & R-8 Districts.~~ The Zoning Code (Section 4-110H-3) was amended to include both density and Floor Area Ratio (FAR) incentives for developers to provide "affordable" independent senior living units.
- ~~2. Inclusionary Housing and Height/Density Bonus Requirement in the RS Zoning District.~~ The Village also created a new zoning district to deal with the unique characteristics of senior and group living facilities. The RS District includes several provisions intended to promote affordable housing (all in Section 4-110H), including increased FAR and building height, provided that not less than ten percent (10%) of all units within Independent Senior Living Facilities in the RS District shall be constructed and operated as affordable units, as defined in the special permit. These standards were used to facilitate the development of the Lodge Senior Living facility, which was developed on the Techny Property (an area identified in the Affordable Housing Plan as targeted for affordable housing). When the Lodge of Northbrook was approved, 15% of the units were required to meet a local definition of affordability.
- ~~3. Density & FAR Bonuses in New VGRC District.~~ The Village Green Residential and Commercial (VGRC) district was established in 2016 to accommodate the Gateway Townhome development on Shermer Road. The VGRC district allows a mix of residential uses, including single family homes, townhomes and other multi-family structures. Incentives were established in the district to promote the supply of affordable housing near the downtown area and in close proximity to the transit options available. The incentive established in the VGRC district include opportunities for an increase in the maximum residential density for structures by up to twenty-five (25) percent or an increase of up to twenty-five (25) percent in the absolute maximum floor area ratio if affordable housing units are incorporated into the proposed development.

IV. AFFORDABLE HOUSING PLAN

A. Progress Made in Achieving the Goal of 10% Affordable Housing

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According to IHDA's calculations pursuant to Section 20(b) of the Act, in the year 2023, the Village of Northbrook had 439 affordable for sale units housing and 205 affordable rental units² for a total of 644 674 affordable housing units in the Village. Thus, IHDA has calculated that in the year 2000 2023, 5.30 5.00 percent of the Village's total housing units of 12,197 13,395 were affordable in the year 2000 2023.

~~IHDA prepared an updated analysis of housing for municipalities in the State of Illinois in the year 2007. That study estimated that Northbrook continued to have 5.30 percent of its housing affordable based on the IHDA standards.~~

~~An analysis of U.S. Census Bureau data was completed by IHDA in 2013. That analysis estimated that the percentage of housing units in Northbrook had decreased to 4.40 percent.~~

~~In the year 2018, IHDA completed another analysis of Illinois municipalities housing conditions. The 2018 analysis estimated that the percentage of housing units in Northbrook that were affordable had increased to 5.70 percent.~~

In order for the Village to reach exempt status under the Act, the Village must have 10 percent of its total housing stock as affordable housing units, as defined by the Act. Assuming that the total housing unit calculation of 12,197 13,395 used for the year 2000 2023 calculations were to remain constant, ~~the~~ Village needs a total of 4,220 1,340 affordable housing units to be exempt under the Act. After deducting the 644 674 existing affordable housing units calculated by IHDA from the total affordable housing units required to be exempt from the Act, 576 666 additional affordable housing units are needed in the Village.

B. Identification of Lands and Structures Most Appropriate for Affordable Housing

~~In identifying properties and structures that are most appropriate for affordable housing, it is important to note that appropriate does not simply translate to those properties or structures that are vacant and undeveloped. Northbrook has identified that the areas within the community, that are most appropriate for development or redevelopment into affordable housing opportunities including developments are¹:~~

¹ *The Village's identification of properties or structures most appropriate for affordable housing development does not ensure that these properties will be developed with affordable housing, nor does it create any entitlement therefor. Conversely, such identification is not intended to affect the existing development rights currently vested in such properties.*

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- Downtown/Central Business District: This includes the Village Green Overlay District, which authorizes a variety of land uses.
- Shermer Road Corridor: This area includes a mixture of existing multifamily developments and industrial and commercial service uses.
- Techny Road East of Shermer Road: This area includes a sizable amount of potentially developable land, specifically on the south side of Techny Road.
- Waukegan Road Corridor: This area includes both existing multifamily dwellings and potentially developable land.
- Crestwood Place: This existing affordable senior housing development is owned by the Village and has potential for future expansion.
- Industrial Park Perimeter: Development of multifamily dwellings at certain of these locations may provide convenient housing for a local work force and provide an appropriate transition from more intense industrial uses to single-family dwellings.
- Techny Property: This approximately 775 acre tract is partially developed under the terms of an annexation agreement approved in 1988. It includes the largest area of undeveloped land in the Village.
- Northbrook Court: A Master Plan for the Northbrook Court Shopping Center site located at 1415-1775 Lake Cook Road was approved in 2023 which included approval of up to 2,000 residential units.
- Other Redevelopment Sites: Although the Village is largely built-out, it is expected that there will continue to be other properties that will present opportunities for redevelopment. Those that are deemed appropriate for residential development will be required to comply with the Affordable Housing Plan.

Areas where affordable housing units have been approved and constructed, as well as proposed units under zoning review include:

Built and occupied:

- 117 affordable senior housing apartments at Crestwood Place
- 5 affordable rental townhomes constructed at 154 Pointe

Approved by the Village, construction to begin soon:

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- 8 affordable for sale townhomes received zoning approval at 3700 Dundee Road
- 48 affordable and supportive apartments received zoning approval at 1657 Shermer Road
- 5 affordable rental apartments received zoning approval at 1657 Shermer Road
- Master Plan for 1415-1775 Lake Cook Road includes approval of: payment of \$4,500,000.00 for fee-in-lieu of affordable units, dedication of 1.5 acres for use of a 100% affordable housing building with 75 units, inclusion of 25 workforce housing units, and a requirement for 668 market rate units to comply with the affordable housing ordinance in the Zoning Code.

C. Affordable Housing Policies and Incentives

The Village of Northbrook has adopted and may continue to adopt, implement or otherwise facilitate, the following policies and incentives in the areas of zoning and finance to encourage the development of affordable housing by both for-profit and non-profit developers in the Village:

Zoning:

- Inclusionary zoning to require new multifamily developments and redevelopments to include a minimum required amount of affordable housing. Such ordinances may also allow a developer to provide the required affordable housing off-site (such as through other new construction or rehab) or pay a fee into an affordable housing fund, in lieu of providing the required affordable housing on-site if the Board determines that such a payment will create affordable housing opportunities in the Village to an equal or greater extent than through the inclusion of affordable units in the governed development.
- Amendments to the zoning map and comprehensive plan to allow the expansion of the number of multifamily locations for affordable housing development.
- Continue to assess potential amendments to the Zoning Code to create methods for increasing the number of affordable housing units in varying types and districts including consideration of smaller minimum unit size to serve 1-2 person households which are 80% of the village's current renter households and that account for 58.5% of owner households.
- Bonuses or other incentives regarding zoning requirements for developers who

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provide affordable housing, such as reduced parking, lot size, setback or lot coverage requirements, or increased density.

- ~~Fee reductions or waivers for zoning related costs for those providing affordable housing.~~
- Expedited processing of zoning applications for those proposing to provide affordable housing.
- Authorize accessory living **dwelling** units as permitted uses in selected zoning districts.

Finance:

- **Research** reduced building permit fees for affordable units.
- **Research** municipal property tax abatements.
- **Research** reductions to or waivers of required impact fees or Village utility rates.²
- Coordination with an affordable housing developer attempting to use IHDA Housing Trust Funds (matching funds) or other non-for-profit grant funds.
- Adoption of a special tax or fee **Maintain the Demolition Tax** for demolition of residential uses to help fund affordable housing initiatives.
- **Addition of an Impact Fee Payment for all residential developments consisting of five or fewer units to pay \$10,000 per additional unit with revenue to be deposited into the Affordable Housing Trust Fund.**
- Establishment of a Community Land Trust **with a partner organization** to acquire and maintain ownership of land for affordable housing and to assist in ensuring that rental and for sale housing it manages remains affordable.³
- Cooperation with local businesses that wish to implement employer-assisted housing programs expand housing options for the employer's workforce, whether the employer is private sector or governmental. Examples of such programs may include down payment assistance, rental subsidies, or contracting with community-based housing

² This may be impacted by any bond covenants that the Village may have in place from time to time.

³ The land trust is typically held by a non-profit organization, but local governments and private companies can also hold land trusts. Public or private funds, including fee-in-lieu funds, can be used for the purchase of land.

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organizations to assist employees with housing choices

- Rehabilitation or redevelopment of existing structures for conversion to affordable housing or to maintain existing affordable housing by private or public sector entities. One such conversion is the Village's own Crestwood Place, which provides senior citizen affordable housing in an unused school building.

D. Local Housing Market Conditions

Northbrook is a developed community and 78.4% of the housing units are single-family residences. Based on data from the Northbrook Housing Profile which was published in 2025 by the Chicago Metropolitan Agency for Planning (the source data from 2019-2023), just 13.3% of the units in Northbrook are rented, with the remaining 86.6% are owner occupied homes. While the average income level in Northbrook is higher than the state average, the Village currently has 30.2% of homeowners and 53.5% of renters who make \$99,000 or less annually. Considering the median home sales value is \$525,000 this creates a significant income gap between the household income and the cost of housing options available in the Village. This creates a situation where many households are cost burdened or severely cost burdened by their monthly housing cost. Specifically, 14.3% of homeowners are spending 30-50% of their income on housing and 11.3% spend greater than 50% of their monthly income on housing. For renters in the Village, it is even more challenging, with 22% paying 30-50% of their monthly income on housing and 29.7% spending greater than 50% of their income on housing each month. This means currently there are 826 households in the Village that are cost burdened or severely cost burdened.

The local housing market in the Village of Northbrook continues to remain a steady robust market with a median sale price typically above \$525,000.00⁴, with a majority of home sales being for detached single-family structures. The Village has recently approved several additional townhome developments consisting of some rental and some for sale, as well as two additional apartment buildings.

The rental market vacancy rate in Northbrook consistently remains below 3.0%. Of the newest larger luxury apartments to have been constructed, the vacancy rate fluctuates below 3-4%.

With the introduction of the Zoning Code regulations for Affordable Housing in New

⁴ Source: Chicago Metropolitan Agency for Planning Housing Profile for the Village of Northbrook
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Developments, the Village has not seen a decrease in interest for developing residential properties.

E. Goals to Mitigate Local Housing Market Conditions

The Village currently continues to enforce the Affordable Housing requirement in New Developments ordinance adopted on December 8, 2020. The implementation of the ordinance has accounted for several required affordable residential units of varying sizes to be approved for construction in conjunction with market rate developments. The Village is also beginning the process of entering into a Community Land Trust with a partner organization which will assist in acquiring existing affordable housing units to remain affordable in perpetuity instead of being torn down and replaced with higher end homes.

The Village has drafted a new Zoning Code which is in the final stages of consideration and proposes an ability to allow attached accessory dwelling units by right, duplex units in the densest detached single family residential district, and elimination of maximum allowed floor area ratios. The combination of those elements, along with reduced parking standards and some other improvements, will allow for additional housing types to be more easily constructed in Northbrook at a more affordable price point.

E. Northbrook Affordable Housing Goals

The Village of Northbrook has identified the following targets for the development of affordable housing in the Village⁵:

- 15% of all new development or redevelopment in the Village will be affordable;
or
- 53% increase in affordable housing units in the Village over the number of affordable units calculated by IHDA pursuant to Section 20(b) of the Act.

In furtherance of reaching these targets, the Village of Northbrook establishes the following goals for its Affordable Housing Plan:

1. Continue to provide Affordable Housing Plan updates to the Housing Committee of the Village Board of Trustees including monitoring housing data to track and report progress on housing diversification and affordability. No later than June 1, 2022, the Village

⁵ These targets have been established in accordance with the Act and the assumptions set forth in this Plan.

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~~Board shall designate a commission to serve as the standing commission to study affordable housing issues and make recommendations to the Village Board.~~

2. Within 12 months 2 years after implementation of the new Zoning Code Affordable Housing Plan, the Village Board shall refer to the Plan Commission for public hearing possible amendments to the Northbrook Comprehensive Plan to encourage and attract affordable housing in the Village ~~while protecting the public health and safety and in a manner consistent with the character and environment of Northbrook. The proposed amendments should be reflective of the new Zoning Code and achieving the affordable housing goals established in the December 8, 2020 amendments to the Comprehensive Plan.~~

3. Within one year after approval of the Affordable Housing Plan, the Village Board shall refer to the Plan Commission for public hearing possible amendments to the Northbrook Zoning Code and Northbrook Zoning Map to encourage and attract affordable housing in the Village consistent with the public health, safety, character, and environment of the Village, including without limitation the following:

- a. Density bonuses for developments that provide affordable housing units.
- b. Requirements that larger new developments in the Village must include affordable housing units on-site at a rate of 15 percent of the total number units or have an alternate means of compliance approved by the Board of Trustees.

4. After approval of the Affordable Housing Plan, the commission designated Housing Committee of the Village Board by the Board of Trustees to review housing issues in the community shall meet with non-profit affordable housing agencies and groups to discuss issues relating to affordable housing, including potential incentives.

5. At least once a year after approval of the Affordable Housing Plan, the Village Board shall review information regarding housing conditions and grants and other sources of funding, available to assist the Village and affordable housing developers in developing affordable housing in the Village.

6. Not less than every ~~three~~ 4 years following approval of the Affordable Housing Plan, the Village Board of Trustees shall review and update the Affordable Housing Plan. The Village Manager shall monitor increases and decreases in the number of affordable units in the Village and report to the Board thereon in connection with any such review.

~~Obviously, the Village cannot control market forces that affect the affordability of land and~~

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housing within Northbrook, nor the income levels of households that serve as the benchmark for determining affordability. This is particularly true given the largely developed nature of the Village vis-à-vis the larger area against which it is measured for establishing affordable housing targets. Because of these imponderables, as well as the overall uncertainty of the real estate development industry and the changing regulatory milieu in which such development occurs, it is not and cannot practically be a goal of this Plan to meet the target levels of affordable housing units stated above in any specific time frame. Rather, In conclusion, it is the objective of this plan that, by pursuing the goals set forth above, the Village will have created conditions amenable to ultimately achieving the stated affordable housing targets in Northbrook.

DRAFT

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End Notes:

¹ The Village's identification of properties or structures most appropriate for affordable housing development does not ensure that these properties will be developed with affordable housing, nor does it create any entitlement therefor. Conversely, such identification is not intended to affect the existing development rights currently vested in such properties.

² This may be impacted by any bond covenants that the Village may have in place from time to time.

³ The land trust is typically held by a non-profit organization, but local governments and private companies can also hold land trusts. Public or private funds, including fee-in-lieu funds, can be used for the purchase of land.

⁵ These targets have been established in accordance with the Act and the assumptions set forth in this Plan.

For additional information regarding the Northbrook Affordable Housing regulations and administration, including an annually updated Technical Guide, visit www.northbrook.il.us/affordablehousing

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