

Amended Third Round Housing Element And Fair Share Plan

Haddonfield Borough, Camden County, New Jersey

Adopted December 9, 2008

Amended Third Round Housing Element And Fair Share Plan

Borough of Haddonfield, Camden County, New Jersey

December 9, 2008

Prepared for the Borough of Haddonfield by:



Mary Beth Lonergan, PP, AICP

Clarke Caton Hintz

PP License # 4288



**PLANNING BOARD OF THE BOROUGH OF HADDONFIELD
COUNTY OF CAMDEN, STATE OF NEW JERSEY**

**RESOLUTION ADOPTING AN AMENDMENT TO THE
HOUSING ELEMENT AND FAIR SHARE PLAN**

WHEREAS, the Planning Board of the Borough of Haddonfield has the statutory power, after public hearing, to adopt or amend a Master Plan, and any of the elements thereto, to guide the use of the lands within the Borough in a manner that protects public health and safety and promotes the general welfare pursuant to N.J.S.A. 40:55D-28; and

WHEREAS, the Planning Board has reviewed and considered a proposed Amendment to the previously adopted Housing Element and Fair Share Plan Element of the Haddonfield Master Plan, known as an Amended Third Round Housing Element and Fair Share Plan, prepared by Mary Beth Lonergan, PP, AICP of Clarke, Caton and Hintz, Planners, which is attached to this resolution; and

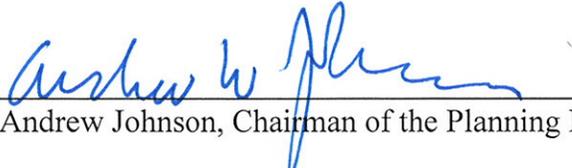
WHEREAS, the Planning Board has determined to amend the Housing Element and Fair Share Plan; and

WHEREAS, upon notice duly provided pursuant to N.J.S.A. 40:55D-13, the Planning Board held a public hearing on the amended Housing Element and Fair Share Plan on December 9, 2008; and

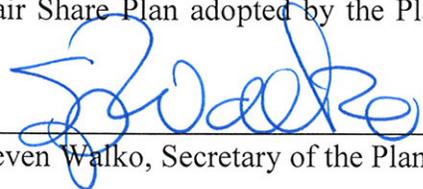
WHEREAS, the Planning Board has considered the testimony of the planning consultant, Elizabeth McManus, PP, AICP and the comments and evidence offered by participants at the public hearing; and

WHEREAS, the Planning Board has determined that the amendment to the Housing Element and Fair Share Plan is consistent with the goals and objectives of the Borough of Haddonfield Master Plan and that adoption and implementation of the amendment to the Housing Element and Fair Share Plan are in the public interest and protect public health and safety and promote the general welfare.

NOW THEREFORE BE IT RESOLVED by the Planning Board of the Borough of Haddonfield, County of Camden and State of New Jersey, that the Planning Board hereby adopts the amended Housing Element and Fair Share Plan.


Andrew Johnson, Chairman of the Planning Board

I hereby certify that this is a true copy of the resolution adopting the amended Housing Element and Fair Share Plan adopted by the Planning Board of the Borough of Haddonfield on December 9, 2008.


Steven Walko, Secretary of the Planning Board



BOROUGH OF HADDONFIELD

Camden County, New Jersey

December 10, 2008

2008-12-09-269

Authorization to Endorse the Adopted Third Round Housing Element and Fair Share Plan and Petition the New Jersey Council on Affordable Housing for Substantive Certification

WHEREAS, the Haddonfield Borough Planning Board did consider and hold a public hearing on a proposed Third Round Housing Element and Fair Share Plan at a special meeting of said Planning Board held on December 13, 2005, and did on that date adopt said Third Round Housing Element and Fair Share Plan; and

WHEREAS, a true copy of the resolution of the Planning Board adopting the Housing Element and Fair Share Plan is attached pursuant to N.J.A.C. 5:95-2.2(a)2; and

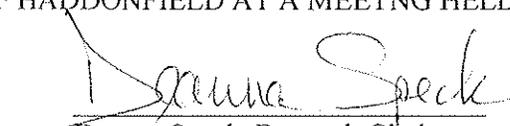
WHEREAS, the Haddonfield Borough Planning Board has recommended that the Commissioners of the Borough of Haddonfield endorse the adopted Third Round Housing Element and Fair Share Plan and submit it to the New Jersey Council on Affordable Housing (COAH) along with a resolution petitioning COAH for substantive certification of the Third Round Housing Element and Fair Share Plan; and

WHEREAS, the Commissioners of the Borough of Haddonfield, County of Camden, State of New Jersey, desire to petition the New Jersey Council on Affordable Housing (COAH) for substantive certification of Haddonfield Borough's Third Round Housing Element and Fair Share Plan.

NOW, THEREFORE, BE IT RESOLVED by the Commissioners of the Borough of Haddonfield, County of Camden, State of New Jersey, as follows:

1. The Commissioners of the Borough of Haddonfield do hereby endorse the Third Round Housing Element and Fair Share Plan as adopted by the Planning Board on December 13, 2005; and
2. The Commissioners of the Borough of Haddonfield do hereby petition COAH for substantive certification of Haddonfield Borough's Third Round Housing Element and Fair Share Plan as adopted by the Planning Board on December 13, 2005; and
3. The Commissioners of the Borough of Haddonfield do hereby direct that a copy of this resolution shall be submitted to COAH immediately, along with a copy of the adopted Third Round Housing Element and Fair Share Plan and any other materials required by COAH in connection with a petition for substantive certification; and
4. Notice of the petition for substantive certification of Haddonfield's Third Round Housing Element and Fair Share Plan shall be given within seven (7) days of notification from COAH's Executive Director that Haddonfield's petition for substantive certification is complete; said notice shall appear in a newspaper of general circulation throughout the County and shall be served upon all interested parties as required at N.J.A.C. 5:95-3.7.
5. Copies of this resolution, the adopted Housing Element and Fair Share Plan and all supporting documentation shall be made available for public inspection at the Borough of Haddonfield Municipal Clerk's office located at 242 Kings Highway East, Room 101, Haddonfield, New Jersey 08033, during the hours of 8:30 a.m. to 4:30 p.m. on Monday through Friday for a period of 45 days following the date of publication of the legal notice pursuant to N.J.A.C. 5:95-3.5.

I HEREBY CERTIFY THAT THIS IS A TRUE COPY OF A RESOLUTION ADOPTED BY THE BOARD OF COMMISSIONERS OF THE BOROUGH OF HADDONFIELD AT A MEETING HELD ON DECEMBER 9, 2008.


Deanna Speck, Borough Clerk



BOROUGH OF HADDONFIELD

Camden County, New Jersey

December 10, 2008

2008-12-09-270

A Resolution Concerning the Borough of Haddonfield's Commitment To Fund its Affordable Housing Program

WHEREAS, the Borough of Haddonfield in Camden County, New Jersey, is petitioning the New Jersey Council on Affordable Housing ("COAH") for substantive certification of its amended Third Round housing element and fair share plan; and

WHEREAS, as part of its petition for substantive certification, the Borough must also seek approval of its municipal spending plan pursuant to N.J.A.C. 5:97-8.1 (d); and

WHEREAS, N.J.A.C. 5:97-8.10(a)(9) requires the Borough to include within its spending plan the manner in which it will address any expected or unexpected shortfall if anticipated revenues are not sufficient to implement its affordable housing plan; and

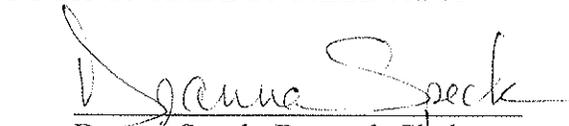
WHEREAS, COAH has determined that the Borough must allocate funds for the municipally sponsored construction of affordable housing plan; and

WHEREAS, the Borough anticipates that funding will come from the following sources to satisfy said municipally-sponsored construction obligation: sources including, but not limited to, the Borough's affordable housing trust fund, and governmental sources such as the Federal Low Income Housing Tax Credits, New Jersey Balanced Housing funds, HUD funding, Federal Home Loan Bank Board financing, HMFA bond financing, Camden County HOME funds, etc.; and

WHEREAS, in the event that the above funding sources prove inadequate to meet the Borough's funding needs, any difference between the cost of implementation and the amount collected by the Borough will be addressed through the use of outside funding sources as set forth in "A Guide to Affordable Housing Funding Sources," dated October 2008, posted on COAH's website, or other funding sources which may come available as may be allowed by law.

NOW, THEREFORE, BE IT RESOLVED by the Commissioners of the Borough of Haddonfield, County of Camden, State of New Jersey, that the Borough does hereby express its intent to fund its affordable housing program in the above mentioned methods.

I HEREBY CERTIFY THAT THIS IS A TRUE COPY OF A RESOLUTION ADOPTED BY THE BOARD OF COMMISSIONERS OF THE BOROUGH OF HADDONFIELD AT A MEETING HELD ON DECEMBER 9, 2008.


Deanna Speck, Borough Clerk

Borough of Haddonfield Commissioners

Mayor Letitia G. Colombi

Edward F. Borden, Jr.

Neal Rochford

Sharon McCullough, Borough Administrator

Deanna Speck, R.M.C., Borough Clerk

Mario Iavicoli, Esq., Borough Attorney

Edwin W. Schmierer, Borough COAH Counsel

Edward J. McManimon, Borough Redevelopment Counsel



Borough of Haddonfield Planning Board

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Diane Marini (Mayor's Designee)

Steven Walko, Land Use Administrator/ Planning Board Secretary

William L. Lundgren, Esq – Planning Board Attorney



EXECUTIVE SUMMARY

This third round amended housing element and fair share plan has been prepared in accordance with the rules of the New Jersey Council on Affordable Housing (hereinafter “COAH”) for Haddonfield Borough, Camden County. This Plan will serve as the foundation for the Borough’s repetition to COAH for substantive certification by the December 31, 2008 deadline.

There are three components to a municipality’s affordable housing obligation: the rehabilitation share, the prior round obligation and the third round obligation.

As assigned by COAH, the Borough’s affordable housing obligations are as follows:

- Rehabilitation Share: **29 units**
- Prior Round Obligation: **37-unit RDP and 155-unit unmet need** = COAH’s prior round obligation of 192 units
- Third Round Obligation: **zero units** (COAH’s initial projection of 15 units is prior to eligible exclusions as discussed below)

The Borough has addressed the rehabilitation share through its existing interlocal services agreement with Camden County. Haddonfield Borough addressed the realistic development potential (hereinafter “RDP”) with existing affordable senior rental units, existing affordable family sale units, an existing group home, proposed affordable family units on-site on a potential redevelopment site as well as off-site affordable family rental units and eligible prior round rental bonuses. In addition, the Borough will address the prior round unmet need with existing overlay affordable zoning throughout the Borough (specifically quantified on three potential

redevelopment sites in the plan), with surplus from addressing the RDP (once constructed) as well through an adopted development fee ordinance.

Although COAH's projected third round growth share obligation has been reduced to zero by COAH-eligible prior round exclusions, the Borough will address a potential third round affordable housing obligation that may be generated by actual residential and non-residential growth "up to the first plan review pursuant to *NJAC* 5:96-10" with existing excess senior affordable housing credits and proposed affordable family rental housing on a municipally-owned, 100% affordable housing site, and corresponding third round rental bonuses.

With the preparation and submission of this amended third round housing element and fair share plan, the Borough finds that this plan and the multitude of existing, proposed and potential affordable housing compliance mechanisms should eliminate the need for COAH's previously imposed scarce resource order. As redevelopment occurs in Haddonfield Borough, affordable housing will be provided.

AFFORDABLE HOUSING IN NEW JERSEY

Introduction to COAH

In its landmark 1975 decision referred to now as “*Mount Laurel I*”, the New Jersey Supreme Court ruled that developing municipalities have a constitutional obligation to provide a realistic opportunity for the construction of low and moderate income housing.¹ In its 1983 “*Mount Laurel II*” decision, the Supreme Court extended the obligation to all municipalities, designated the State Development Guide Plan or any successor State Plan as a critical touchstone to guide the implementation of this obligation and created an incentive for private developers to enforce the “*Mount Laurel* doctrine” by suing municipalities which are not in compliance.²

In 1985, the Fair Housing Act (hereinafter “FHA”) (N.J.S.A. 52:27D-310) was adopted as the legislative response to the *Mt. Laurel* court decisions. The FHA created the Council on Affordable Housing as the administrative alternative to the Courts. COAH is responsible for establishing housing regions, estimating low and moderate income housing needs, setting criteria and guidelines for municipalities to determine and address their fair share numbers, and reviewing and approving housing elements and fair share plans.

Municipalities have the option of filing their adopted and endorsed housing elements and fair share plans with COAH and petitioning for COAH’s approval, known as “substantive certification”. Municipalities that opt to participate in the COAH certification process are granted a measure of legal protection against exclusionary zoning litigation. By petitioning, COAH allows a municipality to maximize control of its planning and zoning options in addressing its affordable housing obligation. Similarly, under the FHA, a municipality can apply to the Superior Court for a Final Judgment of

¹ Southern Burlington NAACP v. Borough of Mt. Laurel, 67 NJ 151 (1975)

² Southern Burlington NAACP v. Borough of Mt. Laurel, 92 NJ 158 (1983)



Compliance and Repose, which is the judicial equivalent of COAH's grant of substantive certification.

Under the Municipal Land Use Law (hereinafter "MLUL"), a municipal Planning Board must adopt the housing element as part of the Master Plan. COAH's process also requires the governing body to endorse the housing element by resolution. In addition, the governing body's resolution requests that COAH review the housing element and fair share plan along with supporting documents for substantive certification action. Once the municipality's housing element and fair share plan have been granted substantive certification by COAH, the municipality's zoning ordinance enjoys a presumption of validity against any lawsuits challenging it. Haddonfield Borough is currently under COAH's jurisdiction and must petition with its amended third round plan by December 31, 2008 to remain so.

First and Second Round Methodology

The FHA empowered COAH to create criteria and guidelines for municipalities to determine and address their respective fair share numbers. In response, COAH established a formula for determining municipal affordable housing obligations for the six-year period between 1987 and 1993 (*NJAC 5:92-1 et seq.*), which became known as the "first round." That formula was superseded by the 1994 COAH regulations (*NJAC 5:93-1.1 et seq.*) which recalculated a portion of the 1987-1993 affordable housing obligation for each municipality and computed the additional municipal affordable housing need from 1993 to 1999; this 12 year cumulative period from 1987 through 1999 is known as the "second round."



Third Round Methodology

On December 20, 2004, COAH's first version of the third round rules became effective. At that time the third round was defined as the time period from 1999 to 2014 condensed into an affordable housing delivery period from January 1, 2004 through January 1, 2014. The third round rules marked a significant departure from the methodology utilized in COAH's two prior rounds. Previously, COAH assigned an affordable housing obligation as an absolute number to each municipality. These third round rules implemented a "growth share" approach that linked the production of affordable housing with future residential and non-residential development within a municipality. Each municipality was required to project the amount of residential and nonresidential growth that would occur during the period 2004 through 2014. Then municipalities were required to provide one affordable unit for every 8 market rate housing units developed and one affordable unit for every 25 jobs created (expressed as non-residential building square footage).

However, in a unanimous decision in January 2007, the New Jersey Appellate Court invalidated key aspects of COAH's third round rules. The Court ordered COAH to propose and adopt amendments to its rules to address the deficiencies identified by the Court. COAH's revised rules, effective on June 2, 2008 as well as a further rule revision, adopted September 22, 2008 and effective on October 20, 2008, provide residential development and job projections for the third round (which was expanded to encompass the years 2004 through 2018). Additionally, COAH revised its ratios to require one affordable housing unit for every four market rate housing units developed and one affordable housing unit for every 16 jobs created, still expressed as non-residential building square footage. Municipalities must set forth in the Housing Element and Fair Share Plan how they intend to accommodate the affordable housing obligation generated by COAH's revised third round growth projections. However, COAH's substantive rules also require that a municipality provide a realistic opportunity for affordable housing in proportion to its actual growth during the third round as

expressed in certificates of occupancy issued for residential and nonresidential development.

In addition, on July 17, 2008 Governor Corzine signed P.L. 2008, c.46 (also known as the “Roberts Bill” after NJ Assembly Speaker Joseph Roberts), which amended the Fair Housing Act in a number of ways. Key provisions of the bill include the following:

- Establishing a statewide 2.5% nonresidential development fee instead of a nonresidential growth share delivery for affordable housing;
- Elimination of regional contribution agreements (“RCAs”); and
- Requirement for 13% of affordable housing units and 13% of all units funded by the Balanced Housing Program and the Statewide Affordable Housing Trust Fund be restricted to very low income households (30% or less of median income).

COAH has not yet promulgated rules to effectuate the “Roberts Bill”. It is anticipated that COAH will propose revised regulations to implement P.L. 2008, c.46 in early 2009.

A municipality’s third round fair share plan must address (1) its rehabilitation share, (2) the prior round obligation and (3) the COAH-projected third round obligation. The rehabilitation share is the estimated number of existing substandard housing units in a municipality that are occupied by low or moderate income households, as determined by COAH (Appendix B. to *NJAC 5:97*). The prior round obligation is a municipality’s adjusted second round new construction component brought forward to the third round (Appendix C. to *NJAC 5:97*). Third round housing plans must document how existing or proposed affordable housing units satisfy this prior round obligation.

As stated above, the third round obligation is based on housing and job projections developed by COAH (Appendix F. to NJAC 5:97). To determine the third round obligation, the following ratios must be applied to the projections:

- For residential development, the affordable housing ratio is 1 affordable unit for every 4 market rate residential units. Thus COAH initially requires a municipality to divide its total housing projection by 5 (see eligible exclusions from COAH’s residential projections as described in detail in a later section);
- For non-residential development, the affordable housing ratio is 1 affordable unit for every 16 new jobs created as expressed in new square footage of non-residential space issued a certificate of occupancy from January 1, 2004 through December 31, 2018. See Table 1, Non-residential Growth Share Calculation, for additional detail.

Table 1. Non-residential Growth Share Calculation

Use Group	Description	Square Feet Generating One Affordable Unit	Jobs Per 1,000 Square Feet
B	Office buildings	5,714	2.8
M	Mercantile uses	9,412	1.7
F	Factories where people make, process, or assemble products	13,333	1.2
S	Storage uses, excluding parking garages	16,000	1.0
H	High hazard manufacturing, processing, generation and storage uses	10,000	1.6
A1	Assembly uses, including concert halls and TV studios	10,000	1.6
A2	Assembly uses, including casinos, night clubs, restaurants and taverns	5,000	3.2

Amended Housing Element and Fair Share Plan
Borough of Haddonfield

Use Group	Description	Square Feet Generating One Affordable Unit	Jobs Per 1,000 Square Feet
A3	Assembly uses, including libraries, lecture halls, arcades, galleries, bowling alleys, funeral parlors, gymnasiums and museums but excluding houses of worship	10,000	1.6
A4	Assembly uses, including arenas, skating rinks and pools	4,706	3-4
A5	Assembly uses, including bleachers, grandstands, amusement park structures and stadiums	6,154	2.6
E	Schools K – 12	Exclude	Exclude
I	Institutional uses such as hospitals, nursing homes, assisted living facilities and jails. I group includes I1, I2, I3 and I4.	6,154	2.6
R1	Hotels and motels; continuing care facilities classified as R2	9,412	1.7
U	Miscellaneous uses, including fences tanks, barns, agricultural buildings, sheds, greenhouses, etc.	Exclude	Exclude

Pursuant to *NJAC* 5:96-10, the actual growth of housing units and jobs (measured by the issuance of residential and nonresidential certificates of occupancy) will be monitored every two years and will be compared to the actual provision of affordable housing. If upon any biennial review the difference between the number of affordable units constructed or provided in a municipality and the number of units required pursuant to *NJAC* 5:97-2.4 results in a pro-rated production shortage of 10 percent or greater COAH may require the municipality to amend its plan to address the higher affordable housing obligation. As such, it is important that the Borough track the growth that occurs between January 1, 2004 and December 31, 2018.

In its Comment and Response document published as part of the October 20, 2008 COAH rule adoption, COAH states that it will allow municipalities to present actual job count information for non-residential use groups if there is at least a 10% difference between actual jobs and the number of jobs determined through Appendix D of *NJAC* 5:97. COAH will be providing more guidance on this concept prior to the Borough's first required plan evaluation whereby actual job growth is tallied and compared to actual affordable housing production.

Affordability Requirements

Affordable housing is defined under New Jersey's Fair Housing Act as a dwelling, either for sale or rent that is within the financial means of households of low or moderate income as income is measured within each housing region. Haddonfield Borough is in COAH's Region 5, which includes Burlington, Camden and Gloucester counties. Moderate-income households are those earning between 50% and 80% of the regional median income. Low-income households are those with annual incomes that are between 30% and 50% of the regional median income. As required by the amended FHA (Roberts Bill), COAH has also included a very low-income category, which is defined as households earning 30% or less of the regional median income.

Through the Uniform Housing Affordability Controls (hereinafter "UHAC") at *NJAC* 5:80-26.3(d) and (e), COAH requires that the maximum rent for a qualified unit be affordable to households that earn no more than 60% of the median income for the region. The average rent must be affordable to households earning no more than 52% of the median income. The maximum sale prices for affordable units must be affordable to households that earn no more than 70% of the median income. The average sale price must be affordable to a household that earns no more than 55% of the median income.

The regional median income is defined by COAH using the federal Department of Housing and Urban Development (hereinafter “HUD”) income limits on an annual basis. In the spring of each year HUD releases updated regional income limits which COAH reallocates to its regions. It is from these income limits which the rents and sale prices for affordable units are derived. See Tables 2 through 4 for additional information. These figures are updated annually and are available from COAH. The sample rents and sale prices are gross figures and do not account for the specified utility allowance.

Table 2. 2008 Household Income Limits for Region 5

Household Income Levels	1 Person Household	2 Person Household	3 Person Household	4 Person household	5 Person Household
Moderate Income	\$41,608	\$47,552	\$53,496	\$59,440	\$64,195
Low Income	\$26,005	\$29,720	\$33,435	\$37,150	\$40,122
Very Low Income	\$15,603	\$17,832	\$20,061	\$22,290	\$24,073

Source: COAH 2008 Regional Income Limits

Table 3. Sample 2008 Affordable Rents for Region 5

Household Income Levels	1 Bedroom Unit Rent	2 Bedroom Unit Rent	3 Bedroom Unit Rent
Moderate Income at 60%	\$836	\$1,003	\$1,159
Low Income at 46%	\$641	\$769	\$889
Very Low Income at 30%	\$418	\$502	\$580

Source: COAH Illustrative 2008 Low and Moderate Income Rents for New Construction and/or Reconstruction

Table 4. Sample 2008 Affordable Sale Prices for Region 5

Household Income Levels	1 Bedroom Unit Price	2 Bedroom Unit Price	3 Bedroom Unit Price
Moderate Income at 70%	\$87,767	\$105,320	\$121,703
Low Income at 50%	\$62,691	\$75,229	\$86,931
Very Low Income at 30%	\$37,614	\$45,137	\$52,159

Source: COAH Illustrative 2008 Low & Moderate Income Sales Prices for New Construction

Housing Element/Fair Share Plan Requirements

In accordance with the Municipal Land Use Law (*NJSA 40:55D-62*), a municipal Master Plan must include a housing element as the foundation for the municipal zoning ordinance. Pursuant to the FHA, a municipality’s housing element must be designed to provide access to affordable housing to meet present and prospective housing needs, with particular attention to low and moderate income housing. The housing element must contain at least the following, as per the FHA at *NJSA 52:27D-310*:

- An inventory of the municipality’s housing stock by age, condition, purchase or rental value, occupancy characteristics, and type, including the number of units affordable to low and moderate income households and substandard housing capable of being rehabilitated;
- A projection of the municipality’s housing stock, including the probable future construction of low and moderate income housing, for the next ten years, taking into account, but not necessarily limited to, construction permits issued, approvals of applications for development, and probable residential development trends;
- An analysis of the municipality’s demographic characteristics, including, but not necessarily limited to, household size, income level, and age;

- An analysis of the existing and probable future employment characteristics of the municipality;
- A determination of the municipality's present and prospective fair share of low and moderate income housing and its capacity to accommodate its present and prospective housing needs, including its fair share of low and moderate income housing; and
- A consideration of the lands most appropriate for construction of low and moderate income housing and of the existing structures most appropriate for conversion to, or rehabilitation for, low and moderate income housing, including a consideration of lands of developers who have expressed a commitment to provide low and moderate income housing.

In addition, pursuant to COAH regulations (*NJAC 5:97-2.3*), the housing element and fair share plan must address the entire third round cumulative (1987-2018) affordable housing obligation consisting of the rehabilitation share, any remaining balance of the prior round obligation and the COAH-projected third round obligation. COAH's regulations require the following documentation to be submitted with the housing element and fair share plan:

- The minimum requirements of the Fair Housing Act, *NJSA 52:27D-310* (listed above);
- Household and employment projections created by COAH;
- Municipal rehabilitation, prior round and third round obligation;
- Descriptions of any credits intended to address any portion of the fair share obligation, including all information required by *NJAC 5:97-4*;
- Descriptions of any adjustments to any portion of the fair share obligation, including all information required by *NJAC 5:97-5*;

- Descriptions of any mechanisms intended to address the prior round obligation, the rehabilitation share and the third round obligation;
- An implementation schedule with a detailed timetable that demonstrates a “realistic opportunity” for the construction of affordable housing, as defined by *NJAC 5:97-1.4*.
- Draft and/or adopted ordinances necessary for the implementation of the mechanisms designed to satisfy the fair share obligation;
- A demonstration that existing zoning or planned changes in zoning provide adequate capacity to accommodate any proposed inclusionary developments, pursuant to *NJAC 5:97-6.4*;
- A demonstration of existing or planned water and sewer capacity sufficient to accommodate all proposed mechanisms;
- A spending plan, pursuant to *NJAC 5:97-8.10*;
- A map of all sites designated by the municipality for the production of low and moderate income housing;
- A copy of the most recently adopted Master Plan and, where required, the immediately preceding adopted Master Plan;
- A copy of the most recently adopted zoning ordinance;
- A copy of the most up-to-date tax maps; and
- Any other information required by *NJAC 5:97* or requested by COAH.

BOROUGH OF HADDONFIELD AFFORDABLE HOUSING HISTORY

As background, Haddonfield Borough received first round substantive certification from COAH on June, 26, 1989. COAH recognized the Borough's limited vacant land and established Haddonfield's realistic development potential (RDP) at zero affordable housing units. The Borough also addressed its 21-unit rehabilitation obligation through the Camden County rehabilitation program.

For the second round, Haddonfield petitioned COAH and received second round substantive certification from COAH on July 7, 1999. Again, COAH recognized the Borough's limited vacant land and reaffirmed the Borough's RDP at zero. Haddonfield supported the affordable housing constructed as part of Lincoln Commons, an existing senior affordable housing complex completed in 2002 and ultimately occupied in 2003. The Borough continued to utilize the Camden County rehabilitation program to address its second round rehabilitation obligation as well as assigning excess senior credits to address the rehabilitation obligation.

As noted in the Borough's initial third round plan adopted by the Borough on December 2, 2005 and submitted as a petition to COAH in December 2005, there was a "spate of interest in the redevelopment of several previously developed commercial properties in and around the Borough's Central Business District, which is an historic district. This was not anticipated at the time COAH granted Substantive Certification to Haddonfield in 1999. In fact, the COAH Staff Report that preceded the grant of Substantive Certification specifically noted that 'A site visit indicated no immediate area that may redevelop within six years.'"

The Borough's 2005 Plan also noted that "In response to this redevelopment interest, Fair Share Housing Center filed a motion with COAH to require the Borough to amend its Housing Element and Fair Share Plan to address these 'changed circumstances'. It also filed a lawsuit against the Borough and the various redevelopers.

In 2004, COAH ordered Haddonfield to amend its Housing Element and Fair Share Plan so as to capture affordable housing opportunities to help meet the (192 unit) unmet need as redevelopment occurs.” On November 22, 2004, COAH issued an opinion restraining development approvals until COAH acted on Haddonfield’s amended second round plan. In the ensuing years, the Borough amended its second round certified plan to address COAH’s concerns and subsequently petitioned with a third round plan in December 2005.

Without reciting all of the lengthy details in this matter before COAH, this amended plan addresses COAH’s prior Pre-Mediation Report Requesting Additional Information dated October 4, 2006 and COAH’s revised third round regulations effective through October 20, 2008.

HOUSING STOCK AND DEMOGRAPHIC ANALYSIS

In 2000, there were 4,618 housing units in Haddonfield Borough, of which 124 or 2.68% were vacant. Of the 4,494 occupied units, 84.53% were owner occupied and 15.46% were rented. Table 5, Housing Units by Occupancy Status, illustrates the occupancy status in 2000.

Table 5. Housing Units by Occupancy Status, 2000.

	Housing Units	Owner Occupied	Renter Occupied
Occupied	4,494	3,799	695
Vacant	124		
Total	4,618		

Source: 2000 US Census

About 76.4% of the total housing stock consists of single-family detached units. Structures with 3 or more units make up 10.78% of the total housing stock. Of the owner occupied units, 88.1% were single-family detached units and 8.8% were single-family attached or two family units. See Table 6, Housing Units by Number of Units in Structure for a detailed explanation of the housing units in 2000.

Table 6. Housing Units by Number of Units in Structure, 2000.

Number of Units	Owner Occupied	Rental	Vacant	Total
1, Detached	3,350	109	69	3,528
1, Attached	270	71	7	348
2	65	159	20	244
3 or 4	12	130	12	154
5 +	102	226	16	344
Mobile Home	0	0	0	0
Other	0	0	0	0
Total	3,799	695	124	4,618

Table 7, Housing Units by Age, illustrates the age of the Borough's housing stock. As one would expect of a Borough with significant historical significance, 51.3% of the Borough's housing stock was constructed prior to 1940. Residential growth slowed significantly after 1960, with only 16.4% of the total housing stock being constructed after that date.

Table 7. Housing Units by Age, 2000.

Year Built	Total Units	Percent	Owner Occupied	Renter Occupied	Vacant
1990 - 2000	141	3.1%	79	62	0
1980 - 1989	82	1.8%	82	0	0
1970 - 1979	260	5.6%	187	30	43
1960 - 1969	271	5.9%	244	21	6
1950 - 1959	1,021	22.1%	942	70	9
1940-1949	472	10.2%	388	66	18
Before 1940	2,371	51.3%	1,877	446	48
Total	4,618	100.0%	3,799	695	124
Median Year	1940				

Source: 2000 US Census

Table 8, Housing Units by Number of Rooms, shows 5.6% have between one (1) and three (3) rooms; 31.5% of the housing stock has between four (4) and six (6) rooms; and 62.0% has seven (7) or more rooms. The data from this and other tables indicate that the housing stock in Haddonfield is, on average, large in size.

Table 8. Housing Units by Number of Rooms, 2000.

Rooms	Number of Units	Percent
1	25	0.5%
2	54	1.1%
3	210	4.5%
4	248	5.3%
5	420	9.0%
6	796	17.2%
7	886	19.2%
8	780	16.9%
9+	1,199	25.9%
Total	4618	100.0%

Source: 2000 US Census

Tables 9 and 10, Housing Values, show that the median housing values of owner-occupied housing in Haddonfield increased 21.31% between 1990 and 2000. During this time, the median value in Camden County increased by 12.4%. In 1990, Haddonfield's median value of \$185,600, which was \$86,700 higher than Camden County's median value of \$98,900. In 2000, Haddonfield's median housing value of \$225,300 was \$114,100 greater than the median value of \$111,200 for Camden County.

Table 9. Housing Values, Owner Occupied, 1990.

Housing Value	Number	Percent
Less than \$50,000	31	0.8%
\$50,000-\$99,999	244	6.6%
\$100,000-\$149,999	812	21.9%
\$150,000-\$199,999	829	22.4%
\$200,000-\$249,999	824	22.2%
\$250,000-\$299,999	333	8.9%
\$300,000-\$399,999	367	9.9%
\$400,000-\$499,999	123	3.3%
\$500,000 or more	139	3.8%
Total	3,702	100%
1990 Median Value	\$185,600	

Source: 1990 US Census

Table 10. Housing Values, Owner Occupied, 2000.

Housing Units	Number	Percent
Less than \$50,000	11	0.3%
\$50,000-\$99,999	78	2.2%
\$100,000-\$149,999	535	15.2%
\$150,000-\$199,999	903	25.6%
\$200,000-\$249,999	469	13.3%
\$250,000-\$299,999	501	14.2%
\$300,000-\$399,999	508	14.4%
\$400,000-\$499,999	256	7.3%
\$500,000-\$749,999	190	5.4%
\$750,000-\$999,999	47	1.3%
\$1,000,000 or more	31	0.8%
Total	3,529	100.0%
2000 Median Value	\$225,300	

Source: 2000 US Census

In 2000, Haddonfield's median gross rental cost was higher than that of the County (\$649 v. \$554). See Table 11, Comparison of Haddonfield and Camden County, Monthly Rental Costs.

Table II. Comparison of Haddonfield and Camden Co., Monthly Rental Cost, 2000

Monthly Rent	Number in Haddonfield	Percent in Haddonfield	Number in Camden Co.	Percent in Camden Co.
\$0-\$99	7	1.0%	1,689	3.1%
\$100-\$149	8	1.2%	1,749	3.2%
\$150-\$199	22	3.3%	1,456	2.7%
\$200-\$249	16	2.4%	1,526	2.8%
\$250-\$299	8	1.2%	748	1.4%
\$300-\$349	0	0.0%	1,539	2.8%
\$350-\$399	8	1.2%	1,771	3.3%
\$400-\$449	21	3.2%	3,501	6.5%
\$450-\$499	0	0.0%	5,500	10.2%
\$500-\$549	63	9.5%	7,138	13.2%
\$550-\$599	75	11.2%	5,647	10.4%
\$600-\$649	107	16.1%	5,636	10.4%
\$650-\$699	48	7.2%	4,494	8.3%
\$700-\$749	54	8.1%	2,955	5.5%
\$750-\$799	48	7.2%	2,088	3.9%
\$800-\$899	73	10.9%	2,946	5.4%
\$900-\$999	29	4.4%	1,375	2.5%
\$1,000-\$1,249	39	5.8%	1,171	2.2%
\$1,250-\$1,499	19	2.85%	299	1.0%
\$1,500-\$1,999	6	1.0%	481	1.0%
\$2,000 +	13	1.9%	389	1.0%
Total	664	100.0%	54,098	100%
Median Rent	\$649		\$554	

Source: 2000 US Census

Haddonfield Borough has 24 housing units that lack complete plumbing facilities and 5 units that are overcrowded (defined as having 1.01 or more persons per room). See Table 12, Selected Quality Indicators.

Table 12. Selected Quality Indicators, Occupied Housing Stock, 2000.

	Overcrowded	Lacking Complete Plumbing	Incomplete Kitchen
No. Units	5	24	11

Source: 2000 US Census

General Population Characteristics

The population of Haddonfield Borough and Camden County experienced slow growth between 1990 and 2000. Between 1990 and 2000, Haddonfield Borough added 31 residents, which represents less than one percent growth rate. Similarly, the County added 6,108 residents, growing at only 1.2% over the last decade. (Table 13, Population Growth).

Table 13. Population Growth.

	1990	2000	Percent Change
Haddonfield Borough	11,628	11,659	0.3%
Camden County	502,824	508,932	1.2%

Source: 1990 and 2000 US Census

From 1990 through 2000, there were dramatic shifts in the age distribution. The age group 15-24 decreased from 19% persons whereas the age group 25-34 and age group 45-54 increased by 27% and 31% respectively. See Table 14, Age Distribution, for additional detail.

Table 14. Age Distribution, 1990 – 2000.

Age Group	1990	Percent	2000	Percent	Percent Change
Under 5	724	6.2%	745	6.3%	2.9%
5-14	1,446	12.4%	1,823	15.6%	2.6%
15-24	1,244	10.7%	1,001	8.6%	-19.5%
25-34	1,500	12.8%	1,084	9.2%	27.7%
35-44	1,929	16.6%	1,934	16.6%	0.2%
45-54	1,538	13.2%	2,017	17.3%	31.1%
55-64	1,253	10.7%	1,201	10.3%	-4.1%
65-74	1,111	9.5%	922	7.9%	-17.0%
75+	883	7.6%	933	8.0%	5.6%
Totals:	11,628	100.0%	11,660	100.0%	

Source: 1990 and 2000 US Census

Household Characteristics

A household is defined by the U.S. Census Bureau as those persons who occupy a single room or group of rooms constituting a housing unit; however, these persons may or may not be related. As a subset of households, a family is identified as a group of persons including a householder and one or more persons related by blood, marriage or adoption, all living in the same household. In 2000 there were 4,496 households in the Borough, with an average of 2.57 persons per household, which is lower than Camden County’s average of 2.68 persons per household. Approximately 77% of the

households are comprised of families. Almost 23% of the Borough's households are non-family households which include individuals.

Income Characteristics

Persons residing in Haddonfield Borough have on average higher incomes than in Camden County as a whole. Median income in 2000 in Haddonfield was \$87,872 for households and \$103,597 for families. Comparable figures for the County were \$48,097 for households and \$86,872 for families. Table 15, Household and Family Income by Income Brackets, further illustrates these findings by noting the number of households in each of the income categories.

Table 15. Household and Family Income by Income Brackets, 2000.

	Households	Percent
Less than \$10,000	153	3%
\$10,000-\$14,999	176	4%
\$15,000-\$24,999	221	5%
\$25,000-\$34,999	261	6%
\$35,000-\$49,000	475	11%
\$50,000-\$74,999	604	13%
\$75,000-\$99,999	729	16%
\$100,000-\$149,999	957	21%
\$150,000-\$199,999	396	9%
\$200,000 +	528	12%
Total:	4500	100%
Median Income:	\$86,872	

Source: 2000 US Census

The percentage of persons and households below the poverty level, as defined by the 2000 U.S. Census, equates to 2.2% of all Haddonfield Borough residents and 1.3% of persons in families. This is lower than the County as a whole, who had 10.4% of County residents living below the poverty level in 2000.

EMPLOYMENT CHARACTERISTICS

Table 16, Distribution of Employment by Industry, shows the distribution of employment by industry for employed Haddonfield Borough residents. The two industries to capture the largest segments of the population were education, health and social services industry at 29% and the professional, scientific, management, administrative and waste management service industry at 20%.

Table 16. Distribution of Employment by Industry, Borough Residents, 2000.

Sector Jobs	Number	Percent
Agriculture, Forestry, Fishing and Hunting, and Mining	5	0.0%
Construction	158	3.0%
Manufacturing	457	8.0%
Wholesale Trade	157	3.0%
Retail Trade	379	7.0%
Transportation and Warehousing, and Utilities	226	4.0%
Information	246	4.0%
Financing, Insurance, Real Estate, Renting, and Leasing	568	10.0%
Professional, Scientific, Management, Administrative, and Waste Management Services	1,154	20.0%
Educational, Health and Social Services	1,680	29.0%
Arts, Entertainment, Recreation, Accommodation and Food Services	221	4.0%
Public Administration	342	6.0%
Other	112	2.0%
Total:	5,705	100%

Source: 2000 US Census

Table 17, Employment by Occupation, identifies the occupations of employed persons. While Haddonfield Borough residents work in a variety of industries, 67.6% of employed residents work in management, professional and related occupations and 20.5% are employed in sales and office occupations.

Table 17. Employment by Occupation, Haddonfield Borough, 2000.

Sector Jobs	Number	Percent
Management, Professional, and Related	3855	67.6%
Service	355	6.2%
Sales and Office	1169	20.5%
Farming, Fishing, and Forestry	5	0.0%
Construction, Extraction, and Maintenance	76	1.3%
Production, Transportation, and Moving	245	4.3%
Total	5,705	100.0%

Source: 2000 US Census

The number of residents in Haddonfield exceeds the number of jobs in the Borough. The New Jersey Department of Labor tracks covered employment throughout the state. Covered employment data includes only those jobs for which unemployment compensation is paid. By definition it does not cover public employees (federal, state, county and municipal), nor the self-employed, unpaid family workers, most part-time or temporary employees, and certain agricultural and in-home domestic workers. See Table 18, Covered Employment Estimates, for additional detail.

Table 18. Covered Employment Estimates, December 2006

Year	Haddonfield	Camden
2006	5,802	209,589

Source: New Jersey Department of Labor, Division of Planning and Research, Office of Demographic and Economic Analysis, NJ Covered Employment Trends. Data is as of December 2006, which is the most current data available at the municipal level.

In 2003, finance and Insurance was the largest sectors of in-town employment, with 1,059, with administrative and waste services in distant second with 662 jobs. Table 19, Covered Employment by Sector, provides information additional detail.

Table 19. Covered Employment by Sector, 2003

	Employment					Wages	
	March	June	Sept.	Dec.	Average	Weekly	Annual
Private Sector Municipality Total	5,261	5,394	5,513	5,570	5,356	\$722	\$37,532
Agriculture, forestry, fishing and hunting
Utilities	97	100	121	115	106	\$932	\$48,442
Construction	33	32	31	30	31	\$766	\$39,821
Manufacturing	65	70	72	66	68	\$1,427	\$74,198
Wholesale trade	537	532	539	566	536	\$382	\$19,879
Retail trade	24	24	24	22	23	\$1,235	\$64,246
Transportation and warehousing	203	211	234	234	216	\$990	\$51,502
Information	57	61	61	68	60	\$843	\$43,841
Finance and insurance	1,064	1,076	1,049	1,067	1,059	\$1,306	\$67,891
Real estate and rental and leasing	45	46	42	33	42	\$881	\$45,834
Professional and technical services	215	247	242	315	245	\$757	\$39,358
Management of companies and enterprises
Administrative and waste services	665	667	679	679	662	\$780	\$40,542
Educational services
Health care and social assistance	287	295	371	346	307	\$277	\$14,406
Arts, entertainment, and recreation	187	199	190	199	194	\$385	\$20,013
Accommodation and food services	40	38	30	39	35	\$495	\$25,746
Other services, except public admin.
Unclassified entities	97	100	121	115	106	\$932	\$48,442
Government Municipality Total	592	608	543	588	546		
Federal Government Municipality Total	41	42	38	38	40	\$1,024	\$53,270
Local Government Municipality Total	551	566	505	550	506	\$861	\$44,796
Total Covered Employment	5,853	6,002	6,056	6,158	5,902		

Source: New Jersey Department of Labor, Division of Planning and Research, Office of Demographic and Economic Analysis, NJ Employment & Wages, Annual Municipality Report by Sector. Data is as of 2003, which is the most current data available at the municipal level.

GROWTH TRENDS AND PROJECTIONS

The Borough expects to meet or exceed COAH's projections for housing growth (75 units) during the third round (2004 through 2018). Although COAH has projected job losses during the third round, the Borough is hopeful to offset job loss with job gains in the reoccupancy of existing structures.

Residential Trends and Projections

Over the last 10 years, Haddonfield Borough issued on average 11 new residential certificates of occupancy per year. This number is deceptively high as the number is skewed by the growth that occurred more recently when Haddonfield experienced a spurt of redevelopment activity. In addition, a portion of the housing growth reflected in certificate of occupancy activity is the tear down of existing single-family homes and the replacement/rebuild of one single-family home. While the Borough expects a similar or a reduced pattern of tear down/rebuilds due to the slowing economy, the Borough anticipates a few small to medium scale residential developments through future redevelopment activity associated. The Borough hopes to address much of its prior round affordable housing obligation with this future redevelopment activity. To ensure the production of affordable housing as part of this future redevelopment activity as it occurs, the Borough previously adopted an ordinance requiring a 20% affordable housing setaside of the total residential units developed.

COAH has projected (Appendix F. to NJAC 5:97) that 75 housing units will be created in the Borough between 2004 and 2018. Haddonfield finds COAH's residential projections to be consistent with the Borough's projections, which were based on certificates of occupancy issued, units under construction and projects that are approved, pending or anticipated before the planning board, as well as potential redevelopment activity that will be described in more detail later in this plan.

Nonresidential Trends and Projections

Haddonfield Borough has had minimal nonresidential growth in the last decade with a limited amount of school and house of worship construction comprising the majority of the square footage added. [As a note, neither school nor house of worship construction generates an affordable housing obligation per COAH's rules effective October 20, 2008 at Appendix D to *NJAC* 5:97.] Given the combination of the slowing economy and the relatively higher expense of redevelopment, Haddonfield expects limited nonresidential growth during COAH's third round period.

COAH has projected (Appendix F. to *NJAC* 5:97) that the Borough will lose 181 jobs between 2004 and 2018. Although COAH anticipates job losses in Haddonfield, the Borough hopes to retain its existing employment opportunities through its economic development policies.

Capacity for Growth

To determine if Haddonfield Borough has the capacity to meet COAH's residential projections between 2004 and December 31, 2018 (as noted above, COAH projects job losses in this same time period), the Borough analyzed projected residential growth through assessing development under construction, approved development and pending applications. The Borough also looked at potential redevelopment that may occur based on the existing capacity of the zoning, historic development trends, and whether the development would be consistent with sound planning principles.

The analysis confirmed that Haddonfield has the capacity to meet COAH's projection of 75 housing units (all of which are associated with redevelopment activity anticipated to address either the prior round RDP or unmet need) and thus to address COAH's projected affordable housing obligation (the Borough hopes not to lose 341 jobs as projected by COAH.) The Borough's existing zoning will support COAH's projected

housing units through inclusionary redevelopments and residential tear down and rebuilds. Additionally, the Borough believes that the commercial businesses will retain their existing employment opportunities.

Availability of Existing and Planned Infrastructure

The Borough of Haddonfield has adequate sewer and water capacity to meet COAH's residential projections (75 housing units) and, as will be discussed later in this plan, as well as up to 332 new housing units that may develop in the future as part of the Bancroft redevelopment (90 units), PATCO redevelopment (140 units), Acme redevelopment (50 units), PNC Bank redevelopment (24 units) and on the Borough/CIS site (28 units) and any limited nonresidential redevelopment (PATCO - 12,000 sq.ft. of retail space) that may occur.

Haddonfield Borough's Sewer Department operates a public sewer service system and the sewerage flows are ultimately treated by the Camden County MUA at the Camden County Treatment Plant along the Cooper River. According to Joe Keating, Haddonfield's Director of Utilities, the Borough's existing sewer system has the capacity to handle the sewerage flows from the potential new development. Mr. Keating noted that at the time of each redevelopment project, the Borough's engineers will determine if the existing sewer system requires piping upgrades. The Borough's Water Department also has capacity in its public water system to serve the needs of the potential new redevelopment projects. The Haddonfield Water Department maintains three existing wells and also maintains interconnections with NJ American Water for water supply through a long-term contract. Mr. Keating estimates that NJ American Water provides approximately 22% of the Borough's water needs on an annual basis. The existing public infrastructure will serve the inclusionary residential units projected to address both the Borough's prior round and the third round fair share obligations and any nonresidential redevelopment that occurs.

Anticipated Land Use Patterns

Anticipated land use patterns range from single family residential infill units in existing residential neighborhoods to upper story apartments in the Downtown. The Borough also anticipates the redevelopment of the Bancroft School site (described in detail below). While other sites may redevelop, such as the PATCO train station site, the Acme grocery store site, the PNC Bank site and others, the Borough has adopted zoning mechanisms to capture affordable housing opportunities. While the Borough does not project significant nonresidential growth or redevelopment, it will continue to preserve its commercial zoning districts which are highlighted by the recently enacted “Downtown Zoning Code” in accordance with its economic development policies. The Borough’s planned land use pattern will support COAH’s projected residential growth and resulting affordable housing obligation.

Borough Economic Development Policies

Haddonfield Borough’s economic development policies encourage business retention within its commercial districts. The Borough has encouraged economic development which comports with sound planning principles by providing zoning districts that permit a variety of non-residential uses including office space and retail.

Constraints on Development

Located entirely in the Metropolitan Planning Area, PA 1, the Borough is not located within the jurisdiction of the Meadowlands, Highlands, Pinelands or CAFRA. There are no known federal regulations that would hinder the development projected as part of the Borough’s third round housing element and fair share plan.

Existing land ownership patterns may present a constraint on future development within the Borough. Haddonfield has no vacant land, thus new development will require the redevelopment of existing vacant and occupied structures. This will be complicated by the land ownership patterns in the Borough. The municipality is densely settled with small lots. New residential and commercial development will require developers to assemble a number of small lots from different owners, which is costly and time consuming.

While Haddonfield Borough is home to a number of important natural resources, environmental constraints do not preclude the Borough from meeting COAH's projected growth. The Borough's waterways are not designated as Category 1 waterways and associated buffers. Moreover, while the NJDEP wetlands layer shows areas in Haddonfield that are affected by wetlands, the areas in question do not limit proposed redevelopment such that 75 housing units could not be redeveloped in the Borough. Although according to NJDEP mapping the Borough has a number of contaminated sites that require remediation, none of these sites impacts the anticipated growth or the Borough's affordable housing compliance efforts.

The Borough took environmental constraints into account in analyzing COAH's projected growth through the third round. To ensure that development does not adversely impact environmentally sensitive features, the Borough will rely on local, county and state review of applications for development. Furthermore, the Borough's Master Plan, Land Use Ordinances and existing land review procedures provide the measures to address any of the development constraints noted above and as set forth at *NJAC* 5:97-3.13(b).

CONSIDERATION OF LANDS APPROPRIATE FOR AFFORDABLE HOUSING

As part of this amended housing element, the Borough has considered land that is appropriate for the construction of low and moderate income housing in existing residential neighborhoods (infill sites) and as part of potential future redevelopment efforts for inclusion in the plan to address prior round RDP or unmet need. The amended housing element describes the Borough's evaluation of a municipally-owned site for 100% affordable housing to address the growth share for actual third round development or redevelopment. The Borough's analyses are discussed in the sections entitled "The Satisfaction of the Prior Round Obligation" and "Satisfaction of the Third Round Obligation."

HADDONFIELD'S AFFORDABLE HOUSING OBLIGATION

COAH's third round methodology includes the rehabilitation obligation, the prior round obligation and the third round obligation. The Appendices to COAH's substantive rules, *NJAC 5:97 et seq.*, provide each municipality's affordable housing obligation. Haddonfield's third round obligation can be summarized as follows:

- Rehabilitation Obligation: 29 units
- Prior Round Obligation: 37-unit RDP and 155-unit unmet need
- Third Round Obligation: zero units (App. F to *NJAC 5:97* indicates COAH's projection totaling 15 affordable units prior to eligible exclusions for prior round inclusionary redevelopment that will be built after January 1, 2004.)

Rehabilitation Obligation

The rehabilitation obligation is defined as the number of deficient housing units occupied by low and moderate income households within a municipality (*NJAC 5:97-1.4*). COAH calculates this figure using indices such as overcrowding of units constructed prior to 1950, incomplete kitchen facilities, incomplete plumbing facilities and the estimated number of low and moderate income households in the municipality. COAH has calculated Haddonfield's rehabilitation obligation to be 29 units. See Table 20, Calculation of the Rehabilitation Obligation, for additional information.

Table 20. Calculation of the Rehabilitation Obligation

Overcrowding of units constructed prior to 1950	5
Incomplete plumbing facilities	+ 24
Incomplete kitchen facilities	+ 11
Low and moderate income share	*0.737
Rehabilitation share credit	- 0
<i>Rehabilitation Obligation</i>	<i>29 units</i>

Source: Appendix B to NJAC 5:97

Prior Round Obligation

The prior round obligation can be defined as the cumulative 1987 through 1999 affordable housing obligation (NJAC 5:97-1.4). This time period corresponds to the first and second rounds of affordable housing. COAH has calculated Haddonfield's prior round obligation to be 192 units (Appendix C. to NJAC 5:97). As discussed below, Haddonfield has included the possible redevelopment of the Bancroft site in its RDP and thus has a 37-unit RDP and 155-unit unmet need for the prior round.

Third Round Obligation

COAH has taken a very different approach to calculating third round affordable housing obligations. The obligation is initially based solely on COAH's housing and job projections for each municipality during the third round. For every five housing units, projected during the third round, one affordable housing unit must be provided. For every 16 jobs projected, the Borough must provide one affordable housing unit. COAH's substantive rules require that a municipality plan for the affordable housing

obligation generated by the projections; however, a municipality must provide affordable housing in proportion to its actual growth (*NJAC 5:97-2.2(e)*). COAH has projected the creation of 75 housing units and the loss of 181 jobs in Haddonfield during the third round (*NJAC 5:97 Appendix F, Allocating Growth to Municipalities*)

COAH's substantive rules, at *NJAC 5:97-2.4*, permit municipalities to exclude certain market and affordable units from the third round housing projections. Specifically, municipalities may exclude the following:

- Affordable units which received credit in a first or second round plan and have been or will be constructed during the third round.
- Market rate units in an inclusionary development which 1) received credit in a first or second round plan or are eligible for credit in the prior round and 2) have been or will be constructed during the third round.

The Borough has five developments (two inclusionary redevelopment sites addressing the RDP and three inclusionary redevelopment sites addressing the unmet need) which are eligible for exclusion.

- ✓ A total of 4 affordable units built at the Kings Court site will exclude 16 total market-rate units constructed (4 affordable units x 4.0 exclusion rate = 16 market-rate units excluded).
- ✓ For the future redevelopment of the Bancroft site, the Borough is in continuing negotiations with Bancroft as to the possible redevelopment project contemplated. Although no definite redevelopment plans are known at this time, the borough will ensure that the redevelopment activity on the site will address a portion of the Borough's prior round RDP with both on-site and off-site affordable housing units. For this amended plan, the Borough will assume that Bancroft will provide for 22.3% of its units as

affordable and that 10 affordable units will be built on the Bancroft site and that Bancroft will fund the construction of 10 off-site/in-town affordable units on the Borough-owned/Community Investment Strategies (“CIS”) site (see description below). Thus, a total of 20 affordable units developed in town will exclude 80 total market-rate units proposed at the Bancroft site (20 affordable units x 4.0 exclusion rate = 80 market-rate units excluded).

- ✓ To address the prior round unmet need, the Borough has provided Borough-wide zoning to capture affordable housing opportunities and, specifically, on three sites that may redevelop in the future with a residential component. A total of 50 affordable market-rate units on the three sites would exclude 194 total market-rate units as well as 12,000 square feet of retail space that may be redeveloped at the PATCO site (48.7 affordable units x 4.0 exclusion rate = 194 market-rate units excluded, plus 1.3 affordable units on the PATCO site excludes the projected 12,000 square feet of retail space that may be redeveloped at the PATCO site ($12,000 \div 9,412 = 1.3$ affordable units)).

Accordingly, the Borough’s third round obligation is calculated in Table 21, Calculation of the Third Round Obligation. As seen below, COAH’s initial projection of 15 total affordable units is reduced per *NJAC* 5:97-2.4(a) to a zero-unit third round growth share obligation.

Table 21. Calculation of Third Round Obligation

Residential	
Projected Units	75
Exclusions	
Kings Court – Market-rate Residential Units	- 16
Bancroft – Market-rate Residential Units	- 80
PATCO – Market-rate Residential Units	- 105
Acme - Market-rate Residential Units	- 40
PNC Bank - Market-rate Residential Units	- 19
Units Creating Growth Share	-185
<i>Residential Growth Share (÷ 5) *</i>	0
Nonresidential	
Projected Jobs	-181
Exclusions	
PATCO – 12,000 sq.ft. of retail space	-20.4
<i>Total</i>	0
Jobs Creating Growth Share	-201.4
<i>Nonresidential Growth Share (÷16) *</i>	0
Total Third Round Obligation	16

* Per *NJAC* 5:97-2.4(a)2 and (b)2, the projected residential or non-residential growth share obligation shall not go below zero.

HADDONFIELD'S AFFORDABLE HOUSING PLAN

Satisfaction of the Rehabilitation Obligation

Haddonfield Borough will continue to utilize Camden County's Home Improvement Program to satisfy its 29-unit rehabilitation obligation. The Camden County Division of Community Development runs a rehabilitation program using federal Community Development Block Grant (hereinafter "CDBG") funds and County HOME program funds.

Camden County's rehabilitation program will adhere to the regulations in *NJAC 5:97-6.2*. Specifically, all rehabilitated units will comply with the definition of a deficient unit in *NJAC 5:97-1.4*, which states, "a housing unit with health and safety code violations that require the repair or replacement of a major system". Major systems include weatherization, roofing, plumbing, heating, electricity, sanitary plumbing, lead paint abatement and/or load bearing structural systems. All rehabilitated units shall meet the applicable construction codes. Additionally, all rehabilitated units shall be occupied by low or moderate income households and upon completion of the rehabilitation, ten year affordability controls shall be placed on the property in the form of a lien or deed restriction.

All rehabilitations shall have an average hard cost of \$10,000. Haddonfield Borough will provide funding from the affordable housing trust fund if necessary to supplement the County's CDBG or HOME program funds. Furthermore, Haddonfield will see that funding for a minimum of 15 rehabilitations (at least half of the obligation) is available by 2014 - the midpoint of the compliance period.

Satisfaction of the Prior Round Obligation

Haddonfield's prior round obligation (1987-1999) is 192 units (Appendix C. to *NJAC* 5:97). Pursuant to COAH's October 4, 2006 Report which analyzed the Borough's initial third round plan, COAH required that the Borough analyze potential redevelopment opportunities. The Borough commissioned Remington & Vernick (Borough Planners) to prepare an inventory of vacant sites and sites that may redevelop. Pursuant to the R&V analysis, the Borough continues to have no vacant land to address the prior round obligation. However, the potential of some sites to redevelop and thus provide affordable housing is noted in the analysis and is listed below. The Borough accepts COAH's previous analysis of the Bancroft redevelopment. Therefore, the Borough has prepared this amended third round housing element and fair share plan to address a 37-unit RDP and the resulting 155-unit unmet need pursuant to *NJAC* 5:97-5.2. COAH permits new construction credits and bonuses addressing a first or second round affordable housing obligation as well as proposed compliance methods to address the prior round obligation consisting of the RDP and remaining unmet need.

For the RDP, COAH requires that the Borough establish the maximum number of age-restricted affordable units and the minimum number of affordable rental units using the formulas below:

- Maximum Senior Units = 16 units
.25 (RDP + Rehabilitation Share – Rehabilitation Credits)
= .25 (37 + 29 – 0) = 16, must round down

- Minimum Rental Obligation = 10 units
.25 (RDP) = .25 (37) = 10, must round up
 - A rental unit available to the general public receives one rental bonus;
 - An age-restricted unit receives a 0.33 rental bonus, but no more than 50 percent of the rental obligation shall receive a bonus for age-restricted units; and
 - No rental bonus is granted in excess of the prior round rental obligation



As summarized in Table 22, Credits/Bonuses/Reductions Addressing Prior Round Obligation (RDP), the Borough has addressed its 37-unit RDP with existing family affordable sale units, existing affordable age-restricted rental units, an existing group home, proposed redevelopment reductions, and prior round rental bonuses.

Table 22. Existing Credits/Bonuses/Reductions Addressing Prior Round Obligation (RDP)

Haddonfield's Prior Round (RDP) Compliance Mechanisms	RDP = 37
<i>Family affordable sales</i>	
Kings Court – existing	4
<i>Senior affordable rentals</i>	
Lincoln Commons – existing	16
<i>Special Needs/Supportive Housing</i>	
Bancroft group home – existing (4 bedrooms)	4
<i>Inclusionary/Redevelopment Reductions</i>	
Bancroft redevelopment site	
onsite affordable units	10
off-site affordable units	10
<i>Rental Bonuses</i>	
Bancroft off-site rentals (10 units x 1.0)	10
TOTAL	54
<i>Surplus towards Unmet Need (once constructed)</i>	17

Family Affordable Sale units

Kings Court developed 16 market rate units and 4 affordable units at 146-148 Kings Highway (Block 34/Lot 10). The four affordable family sale units are completed, have the appropriate affordability controls through deed restrictions, and are administered by NJ Housing Affordability Service (HAS) which is part of the New Jersey

Housing Mortgage and Finance Agency in accordance with the UHAC at *NJAC* 5:80-26.1 et seq.

Senior Affordable Rentals

The Ingerman Group, an experienced affordable housing provider, developed and administers Lincoln Commons Senior Housing. Lincoln Commons is comprised of 48 affordable age-restricted rental units. The units received tax credit financing and have the appropriate affordability controls.

Supportive and Special Needs Housing

Bancroft NeuroHealth, Inc., an experienced supportive and special needs housing provider, operates an existing group home on South Edge Park Drive (Block 1.01/Lot 7). The group home consists of 4 bedrooms and serves very low income residents. Bancroft has leased the dwelling for over ten years and funding has come from the NJ Dept. of Health and Human Services (DHS), Division of Developmental Disabilities (DDD), thus, the group home is eligible for prior round credit by the bedroom.

Bancroft School Redevelopment

The Bancroft NeuroHealth, Inc. (“Bancroft”) school site is an approximately 17.5-acre site (Block 14/Lot 2 and Block 13/Lot25) that fronts on Kings Highway (see site aerial map), is bisected by Hopkins Lane and is adjacent to the Cooper River and Cherry Hill Township beyond. Bancroft currently operates a non-profit school for severely developmentally disabled children on the property. Original structures on the site – a one-acre portion of the site housing Lullworth Hall and a carriage house – received grant monies from the New Jersey Historic Trust for renovation purposes and are specifically restricted from redevelopment. Portions of the site are affected by steep slopes, wetlands

and flood plains associated with the Cooper River. In addition the site is surrounded by the Haddonfield High School to the southeast as well as residences across Kings Highway, both single-family detached and townhouses.

Bancroft issued a Request for Proposals regarding the potential sale and redevelopment of their property in July 2005. Haddonfield adopted a resolution declaring the Bancroft site an area in need of redevelopment, relying upon the prior Redevelopment Area Determination Report: Bancroft Site Redevelopment Area, dated October 2005, prepared by Heyer & Gruel. After the Borough designated the Bancroft site an area in need of redevelopment, Bancroft challenged the Borough's action in Superior Court. Upon subsequent agreement by both Bancroft and the Borough, this court action has been stayed.

Since Bancroft's challenge was put on hold by the parties and court, Bancroft representatives and Borough officials have been in negotiations to establish an appropriate plan for redevelopment. In addition, COAH states in its October 4, 2006 Report, "COAH staff had determined that this site is to be included in the RDP because the site is an underutilized nonconforming use. The property is zoned for residential use and the owner of the site has indicated a desire to sell the property for residential development." Although nothing has yet been formalized, for this amended third round housing element and fair share plan, it is assumed that the site will be eventually be residentially redeveloped. COAH's rules at *NJAC* 5:97-6.6 "Redevelopment" are addressed as follows:

✓ Site Suitability – Site Suitability – The site is suitable as defined in COAH's regulations at *NJAC* 5:97-3.13 "Suitable Site". Except for the one-acre portion encumbered by the New Jersey Historic Trust easement, there are no encumbrances which would preclude the development of affordable housing on the balance of the property. The site is adjacent to residential land uses as noted above. The site has access to both Kings Highway and Hopkins Lane.