

GLOUCESTER TOWNSHIP
Camden County, New Jersey



Housing Element and Fair Share Plan

June 2025

Adopted by the Gloucester Township Planning Board
on _____

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The original of this document was signed and
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I. INTRODUCTION

A. AFFORDABLE HOUSING IN NEW JERSEY

The New Jersey Supreme Court ruled in 1975, in a decision now commonly referred to as “*Mount Laurel I*,” that developing municipalities in New Jersey have a constitutional obligation to provide a realistic opportunity for the construction of low and moderate income housing. Then in 1983 in the “*Mount Laurel II*” decision, the Supreme Court went further, creating an incentive for private developers to enforce the Mount Laurel doctrine by suing municipalities that have not chosen to comply with the *Mount Laurel* principles. Needing a mechanism to implement the *Mount Laurel* doctrine, the legislature adopted the Fair Housing Act (N.J.S.A. 52:27D-310) in 1985, and created the Council on Affordable Housing as the administrative alternative to dealing with affordable housing cases through the courts. COAH was given the responsibility to establish housing regions, estimate low and moderate income housing needs, set criteria for municipalities to determine and address their fair share affordable housing numbers, and review and approve housing elements and fair share plans.

On December 20, 2004, COAH’s first version of the Third Round rules became effective. At that time the Third Round was to cover the time period from 1999 to 2014, since the First and Second Round covered the 1987 to 1999 period. The Third Round affordable housing delivery period was to run from January 1, 2004 through January 1, 2014. After much legal debate on the Third Round Rules, on March 10, 2015, the Supreme Court ruled that the New Jersey Council on Affordable Housing (COAH) failed to act, and as a result, the Courts assumed jurisdiction over municipal compliance with the Mount Laurel doctrine and the Fair Housing Act.

The Township’s Third Round Housing Element and Fair Share Plan was prepared utilizing the Prior Round Rules (N.J.A.C. 5:91 Procedural and N.J.A.C. 5:93 Substantive) as well as the guidance provided in the March 5, 2018 Settlement Agreement - In the Matter of the Application of the Township of Gloucester, County of Camden, Docket No. CAM-L-2610-15, the December 16, 2021 Amended Settlement Agreement - In the Matter of the Application of the Township of Gloucester, County of Camden, Docket No. CAM-L-2610-15, and the April 14, 2022 Conditional Judgment of Repose - In the Matter of the Application of the Township of Gloucester, County of Camden, Docket No. CAM-L-2610-15.

On March 20, 2024, Governor Murphy signed A4/S50 into law ushering in substantial amendments to the New Jersey Fair Housing Act (FHA) and significantly altering the manner in which municipalities will determine their Fourth Round “fair share” obligations, maintain immunity from Mount Laurel lawsuits, respond to objections, and secure approval of their Fourth Round Housing Element and Fair Share Plans. The new affordable housing legislation, A-4 and S-50, establishes processes for calculating municipal housing obligations, compliance filing deadlines, procedures for challenges and dispute resolution mechanisms. The legislation includes considerable amendments to the New Jersey Fair Housing Act and significantly changes the manner in which municipalities will determine their Fourth Round “fair share” obligations, maintain immunity from Mount Laurel lawsuits, respond to objections, and secure approval of their Fourth Round Housing Element and Fair Share Plans.

The amended FHA does the following:

1. Abolishes the Council on Affordable Housing (COAH);

2. Requires the DCA to calculate municipal “fair share” numbers;
3. Establishes a process for municipalities either to accept the DCA’s numbers or to determine and substantiate their own present and prospective fair share obligations based on the formulas established in the bill;
4. Creates parameters for fair share plans, such as age-restricted unit maximums, “family-rental” minimums, bonus credit maximums, etc.;
5. Identifies various compliance techniques;
6. Provides criteria for municipalities to secure and maintain Fourth Round “temporary immunity” from exclusionary zoning/builder’s remedy lawsuits during the process;
7. Permits interested parties to file formal challenges to the numbers and fair share plans, which will be addressed by the new “Affordable Housing Dispute Resolution Program;”
8. Provides a process for fair share plan approval either through the DCA or the courts via declaratory judgment actions; and
9. Delineates ongoing post-approval municipal monitoring and reporting requirements.

The amended FHA also establishes a series of deadlines for actions to be taken prior to, and after, the beginning of Fourth Round in July of 2025. These are:

January 31, 2025: Deadline for Towns to adopt their numbers via “Binding Resolution” (with or without using the DCA’s numbers) thereby establishing temporary immunity.

This was completed via Resolution No. 2025-01-051, adopted by Township of Gloucester on January 27, 2025 and filed with the Program in a Declaratory Judgment action under the caption, In the Matter of the Application of the Township of Gloucester, County of Camden – Complaint for Fourth Round Declaratory Relief, Docket No.: CAM-L-000279-2, dated 1/28/2025.

February 28, 2025: Deadline to challenge the town’s Binding Resolution and adopted numbers.

No challenge was made by Gloucester Township.

March 1, 2025: If no challenges are filed by interested parties, the Town’s numbers are established by default and immunity remains in effect.

No challenges were filed by interested parties.

April 1, 2025: Deadline for the Affordable Housing Dispute Resolution Program (“AHDRP”) to settle the number challenge(s). Not applicable to Gloucester Township.

June 30, 2025: Deadline to adopt and endorse a Housing Element and Fair Share Plan and file with the AHDRP to maintain temporary immunity.

July 1, 2025: First day of Fourth Round

August 31, 2025: Deadline to challenge the validity of a Town's Housing Element and Fair Share Plan.

December 31, 2025: Deadline for the Town to settle the challenge or provide an explanation as to why it will not make all, or some of the requested changes, or both.

March 15, 2026: Deadline for the fourth round of affordable housing obligations, the implementing ordinances and resolutions, proposed, and incorporating any changes from the program, shall be adopted. Failure to meet the March 15 deadline shall result in the municipality losing immunity from exclusionary zoning litigation.

B. HOUSING ELEMENT AND FAIR SHARE PLAN REQUIREMENTS

The Township must prepare and submit both a Housing Element (an element of Master Plan) and Fair Share Plan (describing how the Township will address the obligation). The requirements of the Housing Element are outlined below (N.J.A.C. 5:97-2.1, 2.3 and N.J.S.A. 52:27D-310).

The Housing Element must review and analyze the Township's housing stock, demographic and employment characteristics, leading into the Fair Share Plan, which will demonstrate how the Township will make an effort to provide for its Fair Share obligation. The Housing Element must provide an analysis demonstrating that the plan will provide a realistic opportunity to meet the housing Township's obligations and identify which ordinances must be revised to incorporate the provisions for low and moderate income housing. A municipality's housing element must be designed to achieve the goal of access to affordable housing to meet present and prospective housing needs, with particular attention to low and moderate income housing.

1. Housing Element Requirements under the Fair Housing Act:

A municipality's housing element shall be designed to achieve the goal of access to affordable housing to meet present and prospective housing needs, with particular attention to low- and moderate-income housing, and shall contain at least:

- a. 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, and in conducting this inventory the municipality shall have access, on a confidential basis for the sole purpose of conducting the inventory, to all necessary property tax assessment records and information in the assessor's office, including but not limited to the property record cards;
- b. 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 of lands;
- c. An analysis of the municipality's demographic characteristics, including but not necessarily limited to, household size, income level and age;

- d. An analysis of the existing and probable future employment characteristics of the municipality;
- e. A determination of the municipality's present and prospective fair share for low- and moderate-income housing and its capacity to accommodate its present and prospective housing needs, including its fair share for low- and moderate-income housing, as established pursuant to section 3 of P.L.2024, c.2 (C.52:27D-304.1);
- f. A consideration of the lands that are 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;
- g. An analysis of the extent to which municipal ordinances and other local factors advance or detract from the goal of preserving multigenerational family continuity as expressed in the recommendations of the Multigenerational Family Housing Continuity Commission, adopted pursuant to paragraph (1) of subsection f. of section 1 of P.L.2021, c.273 (C.52:27D-329.20); and
- i. An analysis of consistency with the State Development and Redevelopment Plan, including water, wastewater, stormwater, and multi-modal transportation based on guidance and technical assistance from the State Planning Commission.

C. MUNICIPAL SUMMARY

The land area of Gloucester Township is 23.24 square miles and is located in south central Camden County. Gloucester Township is bordered by Runnemede, Magnolia, Somerdale, Hi-Nella, Stratford, Lindenwold and Pine Hill Boroughs and Winslow and Washington and Deptford Townships.

The 2023 population estimate for Gloucester Township is 66,245 persons based on ACS Census Bureau data as the number of certificates of occupancy, less any demolition permits, multiplied by the average number of persons per unit.

D. FAIR SHARE OBLIGATIONS

1. Prior Round (1987-1999) and Third Round (1999-2025) Obligations

As a result of a March 5, 2018 Settlement Agreement - In the Matter of the Application of the Township of Gloucester, County of Camden, Docket No. CAM-L-2610-15, the December 16, 2021 Amended Settlement Agreement - In the Matter of the Application of the Township of Gloucester, County of Camden, Docket No. CAM-L-2610-15, and the April 14, 2022 Conditional Judgment of Repose - In the Matter of the Application of the Township of Gloucester, County of Camden, Docket No. CAM-L-2610-15; the Township's affordable housing obligation was determined to be rehabilitation need (2015) of 135 units, Prior Round (1987-1999) need of 359 units, and prospective need (1999-2025) of 1,014 units.

Included in the March 5, 2018 Settlement Agreement was the provision:

15. *The parties agree that if a decision of a court of competent jurisdiction in Camden County, or a determination by an administrative agency responsible for implementing the Fair Housing Act, or an action by the New Jersey Legislature, would result in a calculation of an obligation for the Township for the period 1999-2025 that would be lower by more than twenty (20%) percent than the total prospective Third Round need obligation established in this Agreement, and if that calculation is memorialized in an unappealable final judgment, the Township may seek to amend the judgment in this matter to reduce its fair share obligation accordingly. Notwithstanding any such reduction, the Township shall be obligated to adopt a Housing Element and Fair Share Plan that conforms to the terms of this Agreement and to implement all compliance mechanisms included in this Agreement, including by adopting or leaving in place any site specific zoning adopted or relied upon in connection with the Plan adopted pursuant to this Agreement; taking all steps necessary to support the development of any 100% affordable developments referenced herein; maintaining all mechanisms to address unmet need; and otherwise fulfilling fully the fair share obligations as established herein. The reduction of the Township's obligation below that established in this Agreement does not provide a basis for seeking leave to amend this Agreement or seeking leave to amend an order or judgment pursuant to R. 4:50-1. If the Township prevails in reducing its prospective need for the Third Round, the Township may carry over any resulting extra credits to future rounds in conformance with the then-applicable law.*

This provision remained unchanged by the December 16, 2021 Amended Settlement Agreement and the April 14, 2022 Conditional Judgment of Repose.

On March 8, 2018, Mercer County Assignment Judge Mary C. Jacobson issued her opinion on the affordable housing obligations under New Jersey's "Mount Laurel Doctrine" for two Mercer County municipalities, and by extension, municipalities across the state. Under the Jacobson decision, Gloucester Township's Third Round obligations were established as:

| Gloucester Township Affordable Housing Obligations 1987-2025 (Jacobson) | |
|---|-----|
| Rehabilitation (Present Need 2015) | 98 |
| Prior Round (1987 – 1999) | 359 |
| Third Round (Prospective Need 1999-2025) | 713 |

As the 713 Third Round (Prospective Need 1999-2025) as calculated under the Jacobson decision Third Round (Prospective Need 1999-2025) is more than 20% lower than the 1,014 as contained in the March 5, 2018 Settlement Agreement, Gloucester Township has availed itself under the provisions of paragraph 15 of the referenced settlement agreement to establish the Township's Third Round (Prospective Need 1999-2025) to be 713 units. Similarly, Gloucester Township recognizes that the Rehabilitation (Present Need) as of 2015 was 98 units.

2. Fourth Round Obligations (2025-2035)

Under the Affordable Housing Obligations for 2025-2035 (Fourth Round) Methodology and Background as issued by the New Jersey Department of Community Affairs (NJDCa), the Township's Fourth Round (2025-2035) obligations are:

| Gloucester Township Affordable Housing Obligations (NJDCa) | |
|--|-----|
| Rehabilitation (Present Need 2025) | 221 |
| Fourth Round (Prospective Need 2025-2035) | 339 |

E. AFFORDABLE HOUSING HISTORY

A Summary of Gloucester Township's historic affordable housing timeline is provided below:

First and Second Round Obligation

1. On March 6, 1996, the Township of Gloucester secured substantive certification of its cumulative Cycle I/Cycle II Housing Element and Fair Share Plan ("Cycle II Plan") from the New Jersey Council on Affordable Housing ("COAH").
2. By voluntarily complying with its Mount Laurel obligations through COAH's administrative process, Gloucester Township secured immunity from Mount Laurel lawsuits until December 20, 2005.
3. While the Township was implementing its approved Cycle II Plan, COAH adopted its initial Cycle III regulations, which became effective on December 20, 2004.

Third Round Obligation

COAH first proposed Third Round substantive and procedural rules in October, 2003. 35 N.J.R. 4636(a); 35 N.J.R. 4700(a). Those rules remained un-adopted and COAH re-proposed both the substantive and procedural Third Round rules (N.J.A.C. 5:94 and 5:95) in August of 2004 and adopted the same effective on December 20, 2004. (the "2004 Regulations")

The Township of Gloucester's Third Round participation may be summarized as follows:

1. The Township commenced work on its initial Third Round Plan, but that work was suspended when, on January 25, 2007, the Appellate Division struck down COAH's original Third Round Methodology. See In re Adoption Of N.J.A.C. 5:94 and 5:95 By New Jersey Council On Affordable Housing, 390 N.J.Super. 1 (App. Div.), certif. denied 192 N.J. 72 (2007).
2. In August of 2008, COAH adopted amended Cycle III regulations, which became effective on October 20, 2008.
3. Pursuant to those amended regulations, the deadline for a municipality to adopt, endorse, and file its amended Cycle III plan was December 31, 2008.

4. On December 31, 2008, the Township met COAH's deadline and filed its duly adopted and endorsed Cycle III plan ("2008 Plan"), and petitioned COAH for Cycle III certification.
5. However, after COAH granted a number of reasonable extensions of the deadline to repetition, the Appellate Division again invalidated COAH's regulations in In Re the Adoption of 5:96 and 5:97 by the New Jersey Council on Affordable Housing, 416 N.J.Super. 462 (App. Div. 2010).
6. On March 5, 2018 the Township entered into a Settlement Agreement - In the Matter of the Application of the Township of Gloucester, County of Camden, Docket No. CAM-L-2610-15,.
7. On December 16, 2021 the Township entered into an Amended Settlement Agreement - In the Matter of the Application of the Township of Gloucester, County of Camden, Docket No. CAM-L-2610-15.
8. On January 22, 2022 the Township Planning Board adopted the Gloucester Township, Camden Conty, New Jersey – Housing Element and Fair Share, Revised June 2022.
9. On April 14, 2022 Conditional Judgment of Repose - In the Matter of the Application of the Township of Gloucester, County of Camden, Docket No. CAM-L-2610-15 was granted.

II. HOUSING ELEMENT ANALYSIS

A. EXISTING HOUSING STOCK

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, and in conducting this inventory the municipality shall have access, on a confidential basis for the sole purpose of conducting the inventory, to all necessary property tax assessment records and information in the assessor's office, including but not limited to the property record cards.

According to the Census estimate, in 2023 there were 26,296 year-round housing units in Gloucester Township, of which 25,226 were occupied and 1,070 were vacant. In 2023 the vacancy rate was 1.4% for homeowners and 8.8% for rentals.

1. Age of Housing Stock

The Gloucester Township housing stock is younger than the majority of the County stock and the number of persons per household is slightly larger than that of the county. The median year for housing unit construction in Gloucester Township is 1978.

| | Persons Per Household | % Housing Stock Built 1939 or Earlier | Median Year Structure Built |
|---------------------|-----------------------|---------------------------------------|-----------------------------|
| Gloucester Township | 2.61 | 5.4 | 1978 |
| Camden County | 2.58 | 18.1 | 1967 |

Source: U.S. Census Bureau, 2023 ACS

| Gloucester Township Age of Housing Stock | | |
|---|-----------------|-------------------------------|
| Year Constructed | Number of units | Percent of Total in Year 2023 |
| 2020 or later | 298 | 1.1 |
| 2010 to 2019 | 729 | 2.8 |
| 2000 to 2009 | 1602 | 6.1 |
| 1990 to 1999 | 4373 | 16.6 |
| 1980 to 1989 | 4538 | 17.3 |
| 1970 to 1979 | 8209 | 31.2 |
| 1960 to 1969 | 2457 | 9.3 |
| 1950 to 1959 | 1777 | 6.8 |
| 1940 to 1949 | 886 | 3.4 |
| 1939 or earlier | 1427 | 5.4 |

According to the residential building permit data from the New Jersey Department of Community Affairs, 49 residential certificates of occupancy were issued between 2020 and 2023 in the Gloucester Township.

2. Condition and Substandard Units

Of the 25,226 occupied housing units in existence in 2023, 142 units were reported to be without complete plumbing facilities and 142 units were lacking complete kitchen facilities. 549 units within the Township are estimated to have more than one (1) occupants per room. An assessment of the number of substandard units capable of being rehabilitated may be made by considering the number of homes without complete plumbing and kitchen facilities since this information is provided in the Census sample data, but there are other factors to consider as well. Occupied housing units with a low a market value relative to the average in the area may be an indicator of potential for rehabilitation. COAH has also used “crowding” and the age of the housing units to estimate the number of units in need of rehabilitation. There are surely at least a few units that are in need of rehabilitation, within the Township.

The table below presents a breakdown of the Township’s housing stock by number of rooms as they relate to County averages. The Township has a larger percentage of homes with more than six rooms than Camden County overall, with the median number of rooms in the Township at 6.6 per housing unit.

| Gloucester Township Number of Rooms in Housing Units | | | |
|---|------------------------------|---------------------|------------------|
| Gloucester Twp # of Rooms | Gloucester Twp # of Units | Gloucester Twp % | Camden County |
| 1 | 336 | 1.3 | 2 |
| 2 | 850 | 3.2 | 2.6 |
| 3 | 2,009 | 7.6 | 9.7 |
| 4 | 2,712 | 10.3 | 13.5 |
| 5 | 3490 | 13.3 | 14.9 |
| 6+ | 16,899 | 64.2 | 57.3 |
| Median for Gloucester Twp | 6.6 rooms | | 5.9 rooms |

3. Ownership and Rental Characteristics

A majority, 75.2 percent, of Gloucester Township’s population live in owner occupied housing units, while 24.8 percent of the population lived in rented housing units in 2023. 75 percent of the total housing units in Gloucester Township are single family dwellings (rented and owned), 0.4 percent are mobile homes.

| Year Round Housing Units | | | Owner-occupied | | Rental | |
|--------------------------|------------|-----------|----------------|-------|--------|-------|
| Occupied | Vac ant | Tot al | No. | % | No. | % |
| 25,226 | 1,070 | 26,296 | 18,980 | 75.2% | 6,246 | 24.8% |

4. Occupancy Characteristics and Housing Type

The vacancy rate for year round units is low in the Township, 1.4% vacancy for owner-occupied units and 8.8% occupancy for rental units. The average household size in the Township is 2.81 persons per owner occupied units and 2.01 for renter occupied units.

The number of bedrooms in a home is often reflective of the size of a home. The municipalities with a newer housing stock have a larger percentage of units with more bedrooms. This is reflective of the trend toward larger, more sprawling homes in America over the last several decades. Gloucester Township has an older stock of homes and therefore lends itself to a larger percentage of homes with two to three bedrooms.

| | Bedroom Distribution Percent of Housing Stock With: | | |
|------------------------|--|----------------|-------------|
| | One or less Bedrooms | 2 - 3 Bedrooms | 4+ Bedrooms |
| Gloucester Township | 11.2% | 56.7% | 32.1 |
| | | | |
| Camden County | 16.1% | 60% | 24% |

Source: U.S. Census Bureau, ACS 2023 DP04

| Percent Distribution of Housing Units by Structure Type Gloucester Township | | |
|--|-----------------|------------|
| | Number of units | Percentage |
| 1 (detached) | 16,011 | 60.9 |
| 1 (attached) | 3,712 | 14.1 |
| 2 | 1,026 | 3.9 |
| 3-4 | 714 | 2.7 |
| 5-9 | 1,282 | 4.9 |
| 10-19 | 1,004 | 3.8 |
| 20+ | 2,443 | 9.3 |
| Mobile | 104 | 0.4 |
| Other | 0 | 0 |
| Total | 26,296 | 100% |

Source: U.S. Census Bureau, ACS 2023 DP04

| Selected Housing or Housing-Related Value Characteristics | | | | |
|---|----------------------|----------------------|-------------------------|-------------------------|
| | Median Value Housing | Median Contract Rent | Median Household Income | Rental Vacancy Rate (%) |
| Gloucester Township | \$294,900 | \$1,328 | \$95,161 | 8.8% |

Source: U.S. Census Bureau, ACS 2023

B. DEMOGRAPHIC CHARACTERISTICS

1. Historic Population Trends

Gloucester Township's population increased 120% between 1950 and 1960, and continued to grow consistently through 2000. The population started to level off between 2000 and 2010 but has since been rising steadily, with its current 2023 estimate of 66,245. The table below shows the population changes from 1940 through 2023.

| Gloucester Township, Camden County Population | | | | | | | | | |
|---|-------|--------|--------|--------|--------|--------|--------|--------|--------|
| 1940 | 1950 | 1960 | 1970 | 1980 | 1990 | 2000 | 2010 | 2020 | 2023* |
| 6,198 | 7,952 | 17,591 | 26,511 | 45,156 | 53,797 | 64,350 | 64,634 | 66,034 | 66,245 |

Table 6. New Jersey Resident Population by Municipality 1930-1990; * US Census, estimate

2. Recent Population Change

Between 2010 and 2023, the population in Gloucester Township increased from 64,634 to 66,245, an increase of 1,611 people or 2.5%.

3. Population Density

In 2023, the estimated population density in Gloucester Township was 2,848 people per square mile, which is more than Camden County's and State's population density overall.

| Gloucester Township and Surrounding Municipalities Density Indicators | | | |
|---|--------------|------------------------|---------------------------|
| | Square Miles | Population per sq mile | Housing units per sq mile |
| Gloucester Twp | 23.26 | 2,848 | 1,158 |
| Camden County | 227.29 | 2,319 | 941 |
| New Jersey | 8,722.58 | 1,065 | 436 |

Source: Calculated from U.S. Census Bureau, 2023 ACS data

4. Age of Population

The table below provides a breakdown of Gloucester Township's population estimates by age cohorts and gender in 2023. The largest age cohort is 65+ years of age bracket, with 16.3% of the total population. The second largest age cohort is the 45-54, with 14.7% of the population.

| Gloucester Township Summary Population Characteristics 2023 | | |
|--|------------------|------------|
| | Number of People | % of Total |
| Male | 31,876 | 48.1% |
| Female | 34,369 | 51.9% |
| Total | 66,245 | 100.0 |
| | | |
| Under 5 | 4,087 | 6.2% |
| 5 – 14 | 7,823 | 11.8% |
| 15 – 24 | 8,919 | 13.4% |
| 25 – 34 | 9,091 | 13.7% |
| 35 - 44 | 7,461 | 11.3% |
| 45 - 54 | 9,781 | 14.7% |
| 55 - 64 | 8,236 | 12.4% |
| 65+ | 10,847 | 16.3% |
| | | |
| Median Age | 39.8 | N/A |

Source: U.S. Census Bureau, 2023 ACS

5. Household Characteristics

The next table includes family and household characteristics of the Township. In 2023, there were 25,226 households and 15,719 families in Gloucester Township with an average of 2.61 persons per household. The table below indicates that Gloucester Township is comprised of a majority of married/cohabitating couple households (57.3%) with the second largest household type being non-family householders at 42.7%.

| | Number of Households | Percent |
|------------------------------------|----------------------|---------|
| Married / Cohabiting Couple Family | 14,455 | 57.3 |
| with children | 4,738 | 18.8 |
| Male Householder, no spouse | 4,479 | 17.8 |
| with children | 151 | 0.6 |
| Female householder, no spouse | 6,292 | 24.9 |
| with children | 1,113 | 4.4 |
| Total Households | 25,226 | 100 |

Source: 2023 ACS

6. Income Level & Poverty Status

Gloucester Township has higher percentages of households in higher income brackets than the County overall. The Township had a 2023 household median income of \$95,161, compared with the Camden County household median income of \$83,763. 7.7% percent of Gloucester Township's families had household incomes below the federal poverty level, compared with 12.5% in the County.

State affordable housing regulations define low income (those earning up to 50% of the median household income for the region) and moderate income households (those earning from more than 50% to 80% of the median household income for the region). The figures are adjusted for household size and the municipality's geographic location since cost of living differs among regions.

Gloucester Township is located within Region Five, which includes Camden, Gloucester and Burlington Counties. The 2025 income guidelines for Region Five (based on household size) range from \$66,880 (one person household) to \$95,520 (four person household) for the upper limits of what is considered moderate income; and \$41,800 (one person household) to \$59,700 (four person household) for the upper limit of what is considered low income. Median 2023 income for the region ranges from \$83,600 to \$119,400.

| Gloucester Township 2023 Household Income | | | | | | |
|--|---------------------|---------------------|---------------|--------------------|------------|---------|
| | Gloucester Township | | Camden County | | New Jersey | |
| | Households | Gloucester Twp % | Households | Camden County % | Households | State % |
| Less than \$10,000 | 832 | 3.3 | 10,890 | 5.4 | 152,154 | 4.3 |
| 10,000 - 14,999 | 605 | 2.4 | 6,655 | 3.3 | 99,077 | 2.8 |
| 15,000 - 24,999 | 1,186 | 4.7 | 11,697 | 5.8 | 180,461 | 5.1 |
| 25,000 - 34,999 | 1,514 | 6 | 14,117 | 7 | 184,000 | 5.2 |
| 35,000 - 49,999 | 1,160 | 4.6 | 19,360 | 9.6 | 279,538 | 7.9 |
| 50,000 - 74,999 | 3,960 | 15.7 | 27,427 | 13.6 | 467,076 | 13.2 |
| 75,000 - 99,999 | 4,364 | 17.3 | 26,620 | 13.2 | 410,461 | 11.6 |
| 100,000 - 149,999 | 5,802 | 23 | 37,511 | 18.6 | 640,461 | 18.1 |
| 150,000 - 199,999 | 3,506 | 13.9 | 21,175 | 10.5 | 403,384 | 11.4 |
| 200,000 + | 2,270 | 9 | 26,217 | 13 | 721,845 | 20.4 |

Source: U.S. Census Bureau, 2023 American Community Survey 5-year Estimates

| Gloucester Township 2023 Income Levels | | | |
|--|---------------------|---------------|------------|
| | Gloucester Township | Camden County | New Jersey |
| Median Household Income | \$95,161 | \$83,763 | \$99,781 |
| Median Family Income | \$117,626 | \$105,859 | \$121,944 |
| Poverty Status (Percent of people) | 7.7% | 12.5% | 9.7 |
| Poverty Status (Percent of families) | 6.3% | 9.4% | 7.1 |

Source: U.S. Census Bureau, 2023 American Community Survey 5-year Estimates

7. Employment Status of Residents

Of the 53,812 estimated residents aged sixteen and over in 2023, 37,692 were in the labor force (70%). 3.9 percent of the labor force was listed as unemployed in the 2023 ACS. The mean travel time to work for Township residents is 30.3 minutes.

The employment data included in the US Census for the Gloucester Township residents provides a picture of what types of work Township residents are involved in, but does not indicate where those jobs are located. As indicated in the table below, the most significant employment activities of the employed residents are Educational, Health and Social Services with 30.4%, followed by retail trade with 14% and Professional, Scientific, Management, Administrative, and Waste Management Services with 9.3%.

| Industry Code | Gloucester Twp | |
|---|----------------|------|
| | Jobs | % |
| 1 Agriculture, Forestry, Fisheries & Mining | 0 | 0 |
| 2 Construction | 2764 | 8 |
| 3 Manufacturing | 1427 | 4 |
| 4 Wholesale Trade | 935 | 3 |
| 5 Retail Trade | 4934 | 14 |
| 6 Transportation, Warehousing, Utilities | 2953 | 8 |
| 7 Information | 735 | 2.1 |
| 8 Finance, Insurance, Real Estate, Rental | 1630 | 4.6 |
| 9 Prof., Sci., Mgmt., Admin Services | 3316 | 9.3 |
| 10 Educ. Health, Social Services | 10816 | 30.4 |
| 11 Arts, Entertainment, Recreation, Food | 2719 | 7.6 |
| 12 Other Services | 1811 | 5.1 |
| 13 Public Administration | 1537 | 4.3 |

Source: U.S. Census Bureau, 2023 American Community Survey 5-year

| Occupation of Gloucester Twp Residents | | | |
|---|----------------------|-----------------|----------------------------|
| | # Persons | % GT | % Camden County |
| Management, Professional. & Related | 15316 | 43.1 | 42.4 |
| Service | 6111 | 17.2 | 17.2 |
| Sales and Office | 7890 | 22.2 | 20.8 |
| Natural resources, Construction & Maintenance | 2671 | 7.5 | 7.3 |
| Production, Transp. & Material Moving | 3589 | 10.1 | 12.4 |
| Total | 35,577 | 100 | 100 |

Source: U.S. Census Bureau, 2023 American Community Survey 5-year

C. EMPLOYMENT

1. Employment Trends and Outlook

The Delaware Valley Regional Planning Commission publishes employment projections. Employment in Gloucester Township is expected to rise through 2050, with a 5.6% increase.

| Gloucester Township, DVRPC Projected Employment | | | | | | | | | |
|--|-------------|-------------|-------------|-------------|-------------|-------------|-------------|--------------------------------|---------------------|
| Year | 2020 | 2025 | 2030 | 2035 | 2040 | 2045 | 2050 | Change 2025- 50 | % change |
| Projected Employment | 21,877 | 24,176 | 23,940 | 23,697 | 24,307 | 25,361 | 25,523 | 1,347 | 5.6% |

Source: DVRPC 2050 Employment Forecasts, 2020-2050

D. PROJECTED HOUSING STOCK

Residential growth in Gloucester Township has increased since 2008. In 2016 to 2021, residential growth increased steeply.

| Historic Trend of Certificates of Occupancy and Demolition Permits | | | | | | | | | | | | | | | | |
|--|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|
| | '08 | '09 | '10 | '11 | '12 | '13 | '14 | '15 | '16 | '17 | '18 | '19 | '20 | '21 | '22 | '23 |
| COs Issued | 10 | 4 | 13 | 1 | 1 | 1 | 0 | 0 | 69 | 0 | 69 | 4 | 23 | 22 | 4 | 0 |
| Demolitions | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 0 |
| Net | 10 | 4 | 13 | 1 | 1 | 1 | 0 | 0 | 69 | 0 | 69 | 4 | 23 | 22 | 3 | 0 |

Source: New Jersey Construction Reporter

E. FAIR SHARE CAPACITY

1. Availability of Land

All portions of Gloucester Township are located in State Planning Area 1, with the exception of the Lakeland Complex, on the border with Washington and Deptford Townships in Gloucester County. The Lakeland Complex is in Planning Area 2. There is sufficient vacant land and redevelopment areas to accommodate the Township's affordable housing obligations.

2. Availability of Existing and Planned Infrastructure

Water and sewer infrastructure as well as other utilities such as natural gas services are readily available in the Township.

III. Gloucester Township's Fair Share Plan

A. CONTENTS OF A FAIR SHARE PLAN

The Fair Share Plan contains the following information:

- Description of existing credits intended to satisfy the obligation;
- Description of mechanisms that will be used to meet any outstanding obligation; and
- An implementation schedule that sets forth a detailed timetable for units to be provided.

In adopting its housing element, a municipality may provide for its fair share of low and moderate income housing by means of any technique or combination of techniques that provide a realistic opportunity for the provision of the fair share. As per N.J.A.C. 5:93, these potential techniques include but are not limited to:

-
- Rehabilitation of existing substandard housing units;
- ECHO units (as a Rehabilitation credit);
- Municipally-sponsored and 100% affordable developments;
- Zoning for inclusionary development;
- Alternative living arrangements;
- Accessory apartment program;
- Purchase of existing homes;
- Write-down/buy-down programs; and
- Assisted living residences.

B. REGIONAL INCOME LIMITS

Dwelling units are affordable to low and moderate income households if the maximum sales price or rental cost is within their ability to pay such costs, based on a specific formula. The State provides income limits based upon the median gross household income of the affordable housing region in which the household is located. A moderate income household is one with a gross household income equal to or more than 50%, but less than 80%, of the median gross regional household income. A low income household is one with a gross household income equal to 50% or less of the median gross regional household income. Very-low income households are those with a gross household income equal to 30% or less of the median gross household income. Gloucester Township is located in Region 5, which contains Burlington, Camden and Gloucester Counties.

Using the 2025 regional income limits, a four-person household moderate income is capped at \$95,520. Two-person households could make up to \$76,480 and be considered a moderate income household or earn up to \$47,800 and be considered a low income household. See the table on the following page for greater detail.

| 2025 REGIONAL INCOME LIMITS FOR REGION 5 | | | | |
|--|-------------|-------------|--------------|--------------|
| | 1 Person | 2 Person | 3 Person | 4 Person |
| Median | \$83,600.00 | \$95,600.00 | \$107,500.00 | \$119,400.00 |
| Moderate | \$66,880.00 | \$76,480.00 | \$86,000.00 | \$95,520.00 |
| Low | \$41,800.00 | \$47,800.00 | \$53,750.00 | \$59,700.00 |
| Very Low | \$25,080.00 | \$28,680.00 | \$32,250.00 | \$35,820.00 |

Source: UHAC 2025 Affordable Housing Regional Income Limits by Household Size

C. REHABILITATION OBLIGATION COMPLIANCE

The Opinion issued by the Supreme Court of New Jersey on March 10, 2015 states that “the Appellate Division also approved a methodology for identifying substandard housing that used fewer surrogates [or indicators] to approximate the number of deficient or dilapidated housing units”. The Order states that three indicators was not an abuse of discretion. The three indicators utilized are old and over-crowded units, homes with incomplete plumbing and housing units with incomplete kitchens.

Pursuant to the “NJDCA Affordable Housing Obligations for 2025-2035 (Fourth Round Methodology and Background)”, the Township has a rehabilitation requirement of 221 which will addressed through funds in the Affordable Housing Trust Fund and through participation with the Township’s rehabilitation program, which administers with the use of Township CDBG and HOME funds.

N.J.A.C. 5:93-5.2(g) and (h) requires \$10,000 to be spent per unit and a six-year control on affordability for owner-occupied units Rental units are required to have ten-year controls on affordability. Additionally a major system must be repaired in order for a home to qualify as a credit. Section II of this report indicates the condition of houses from the most recently available census data.

- 1 The rules specifically require a minimum of \$2,000 per unit to be spent on administration and \$8,000 per unit to be spent on the rehabilitation activity, which totals at least \$10,000.
- 2 A major system is defined by N.J.A.C. 5:93-5.2(b) as weatherization, a roof, plumbing (including wells), heating, electricity, sanitary plumbing (including septic systems) and/or a load bearing structural system.

D. PRIOR ROUND OBLIGATION COMPLIANCE (1987 - 1999)

The Township had a Prior Round obligation of 359 units and satisfied this obligation per the following:

1. Quail Ridge, an affordable family rental development with 40 units and 40 bonus credits.
2. Revere Run (1 Harbor Lane, Block 14102, Lot 17), an affordable for-sale family development with 37 units.
3. Brittany Woods, an affordable family rental development with 29 units and 29 bonus credits.
4. Valley Stream, an affordable for-sale development with 8 units.
5. Revere Run III (Block 14102, Lot 17) a 100% municipally sponsored family rental affordable housing project. 79 townhouse units are located within this development which resulted in 79 credits and 20 bonus credits.
6. Gloucester Township Housing Authority Senior Campus I (Camden County Lakeland Campus Redevelopment) Block 12301, Lot 1) is an existing senior rental complex with 75 units.
7. 2 of the 24 units in the Multiple Sclerosis Association of America (MSAA) supportive housing facility. Surplus of 22 units carried to Third Round.

The above provides 270 units and 89 bonus credits for a total of 359 credits.

E. THIRD ROUND OBLIGATION COMPLIANCE (1999 - 2025)

The Township had a prior round obligation of 713 units and satisfied this obligation per the following:

1. Franklin Square Senior Village. 178 units of the 224 unit existing affordable senior rental development.
2. Scenic Falls existing affordable family rental development with 99 units and 99 bonus credits.
3. Remaining 22 of the 24 units in the Multiple Sclerosis Association of America (MSAA) supportive housing facility. 22 supportive special needs units with 22 bonus credits.
4. Blackwood West (Southwind) Redevelopment Area 100 family rental housing units (under construction). This approval is an inclusive 495 unit apartment/townhouse development. 100 affordable family units and 57 bonus credits (due to limitation of 25% maximum of bonus credits).
5. 1495 Chews Landing Road (Block 8401 Lot 12.02) as an adopted Inclusionary Apartment overlay zone, allowing for a maximum of 72 units (14 du/acre) with a 15% required affordable housing set aside per adopted zoning overlay. 11 affordable family units.

6. M & T Partners, LLC Development (Block 12302, Lot 1.06). 120 family residential development with 15% inclusion affordable set-aside (18 units) in accordance with Lakeland Aea Redevelopment Plan (Phase 3) adopted August 24, 2020. 18 affordable family units.
7. Volunteers of America - Regan Center Camden County Emergency Housing (508 A Lakeland Road, Blackwood, NJ). 23 units supportive housing units for homeless.
8. Camden County Supportive Housing (Collier Drive). 44 of the 60 units supportive housing facility for the homeless under construction by Camden County.
9. Elmwood Hills Healthcare Center (425 Woodbury Turnersville Road). 300 bed rehabilitation and long term care facility with 10% Medicaid eligibility set aside. 30 supportive needs units.
10. Haddon Detox Center (410 Woodbury-Turnersville Road, Block 12302, Lo 1.07). 54 bed residential detoxification treatment facility with 10% Medicaid eligibility set aside. 5 supportive needs units.
11. Camden County Veterans Cottages at Lakeland. 5 veteran supportive housing units.

The above provides 535 units and 178 bonus credits for a total of 713 credits.

F. FOURTH ROUND OBLIGATION COMPLIANCE (2025 - 2035)

The Township has a Fourth Round obligation of 339 units and satisfied this obligation per the following:

1. Camden County Supportive Housing (Collier Drive). 16 of the 60 units supportive housing facility for the homeless under construction by Camden County.
2. Franklin Square Senior Village. 46 units of the 224 unit existing affordable senior rental development with 8 bonus credits (due to limited to maximum bonus credits).
3. Brittany Woods, an affordable family rental development with 29 units. 2022 extension of affordability controls (30 years). 29 family units with 14 bonus credits.
4. Camden County Lakeland Complex Redevelopment, Phase I (420 Turnersville Road, Block 12301, Lot 4). Zoning adopted by means of existing Redevelopment Plan to permit inclusionary family apartments 25 du/a, 20% set-aside. 10 acres = 250 units (Per Lakeland Complex Phase I (Block 12301) Redevelopment Plan last amended the Township Ordinance O-20-04. 50 affordable family units.
5. Camden County Lakeland Complex Redevelopment, Phase I (420 Turnersville Road, Block 12301, Lot 1). Zoning adopted by means of existing Redevelopment Plan to permit inclusionary family apartments 25 du/a, 20% set-aside. 15 acres = 370 units (Per Lakeland Complex Phase I (Block 12301) Redevelopment Plan last amended the Township Ordinance O-20-04. 74 affordable family units.

6. Camden County Lakeland Complex Redevelopment, Phase 2 (420 Turnersville Road, Block 12302, Lot 1). Zoning adopted by means of existing Redevelopment Plan to permit mix of housing types single family (4 du/a) , townhomes (8 du/a), and apartments (25 du/a) with 20% set-aside for townhomes and apartments. Redevelopment Plan last amended the Township Ordinance O-20-05. 181 affordable family units. (77 for sale townhomes and 104 rental apartments)
7. Quail Ridge, an affordable family rental development with 40 units. Proposed 2030 extension of extension of affordability controls (30 years). 40 family units with 20 bonus credits.

The above provides 436 units and 42 bonus credits for a total of 478 credits.

While the Township has satisfied their affordable housing obligations for the Prior Round, the Third Round and Fourth Round; the Township intends to amend Township ordinance ARTICLE 10. (X.) AFFORDABLE HOUSING PROCEDURAL AND ELIGIBILITY REQUIREMENTS to include the following section:

Section 22. Mandatory Set-Aside

It is required that a 20% affordable housing set-aside where the affordable units are provided for sale and a 15% where the affordable units are provided for rental whenever any residential development, including the residential portion of a mixed use project, consists of five (5) or more new residential units at a density of greater than five (5) units per acres, which results, in whole or in part, from (i) existing municipal zoning, (ii) a municipal rezoning or zoning amendment, (iii) any variances pursuant to NJSA 40:55D-70(d), including but not limited to any use variance or a density variances increasing the permissible density, and/or (iv) the adoption of an new or amended redevelopment plan or rehabilitation plan unless 1) the affordable housing requirements of a residential development is otherwise prescribed by the most recent adopted Housing Element and Fair Share Plan.

1. Very Low Income Housing

In 2008, P.L. 2008, c. 46 was signed by the Governor, which made a number of changes to the affordable housing rules. In fact, it amended the Fair Housing Act (hereinafter "FHA") to include a requirement that at least 13% of affordable housing units must be made available to very-low income households. Specifically, the FHA reads:

The council shall coordinate and review the housing elements as filed pursuant to section 11 of P.L.1985, c.222 (C.52:27D-311), and the housing activities under section 20 of P.L.1985, c.222 (C.52:27D-320), at least once every three years, to ensure that at least 13 percent of the housing units made available for occupancy by low-income and moderate income households will be reserved for occupancy by very low income households, as that term is defined pursuant to section 4 of P.L.1985, c.222 (C.52:27D-304).

"Very low income housing" means housing affordable according to federal Department of Housing and Urban Development or other recognized standards for home ownership and rental costs and occupied or reserved for occupancy by households with a gross household income equal to 30% or less of the median gross household income for households of the same size within the housing region in which the housing is located.

Gloucester Township's very-low income obligation remains at 13% of the affordable housing obligation not constructed.

2. Preservation of Multigenerational Family Continuity

Pursuant to the 2024 Fair Housing Act, an analysis was conducted to evaluate the extent to which municipal ordinances and local factors promote or impede the preservation of multigenerational family continuity, as recommended by the Multigenerational Family Housing Continuity Commission (established under P.L.2021, c. 273). The Commission's primary objective is to facilitate senior citizens' ability to reside with their extended families, in so doing strengthening multigenerational family ties.

A review of the Township's ordinances reveals no provisions that would diminish this objective.

3. State Development and Redevelopment Plan Consistency

This Housing Element and Fair Share Plan is consistent with the 2001 State Development and Redevelopment Plan (SDRP) and the draft proposed SDRP as the proposed projects and zoning mechanisms will provide a meaningful opportunity for the construction of affordable housing.

4. Conclusion

Gloucester Township is a large and diverse community that will continue to grow in a planned and careful manner. The Township has already provided a large amount of affordable homes to its residents, and will continue to plan for responsible development in the future. It has always been Gloucester Township's intent to be inclusionary in its housing policies. The Township has prepared a plan that provides opportunities for the provision of affordable housing, but its implementation will require cooperation among the Township, developers, Camden County and non-profit organizations.

APPENDIX 1

Case Details | Case Number: CAM-L-000279-25

Case Caption: CARLAMERE DAVID VS DEPARTMENT OF COMMUN ITY AFFA

Court: Civil Part

Venue: CAMDEN

Case Initiation: 01/28/2025

Case Track: 4

Case Status: Active

Jury Demand: NONE

Case Type: MT. LAUREL

Judge: SCHWEITZER, SHERRI, L

Team: 300

Law Firm Case ID: 271381972

Transaction Information

Transaction ID: LCV2025208595

Received by eCourts On: 01/28/2025

Total Payment Amount: \$250.00

Documents Received:

COMPLAINT

Case Information Statement

CARLAMERE & ROWAN
 David F. Carlamere Esq. - 271381972
 P.O. Box 1397
 1546 Blackwood Clementon Rd.
 Blackwood, New Jersey 08012
 (856)232-9200

Attorneys For Declaratory Plaintiff
 Township of Gloucester

| | | |
|------------------------------------|---|---|
| | : | |
| | : | |
| | : | SUPERIOR COURT OF NEW JERSEY |
| | : | LAW DIVISION |
| IN THE MATTER OF THE | : | CAMDEN COUNTY |
| APPLICATION OF THE TOWNSHIP | : | DOCKET NO.: |
| OF GLOUCESTER, COUNTY OF | : | |
| CAMDEN | : | <i>Civil Case Type 816 (Affordable Housing)</i> |
| | : | |
| | : | COMPLAINT FOR FOURTH ROUND |
| | : | DECLARATORY RELIEF |

Declaratory Plaintiff, the Township of Gloucester, a municipal corporation of the State of New Jersey, located at 1261 Chews Landing Road, Blackwood, New Jersey 08012, in the County of Camden, by way of Complaint for Declaratory Judgment says:

FOURTH ROUND CERTIFICATE OF COMPLIANCE

1. On March 20, 2024, Governor Philip D. Murphy signed into law P. L. 2024, c.2, which substantially amended the Fair Housing Act (N.J.S.A. 52:27D-301 et seq.) (hereinafter "Amended FHA").

2. The Amended FHA required the Department of Community Affairs ("DCA") to produce non-binding estimates of Fourth Round present and prospective need on or before October 20, 2024.
3. The DCA issued a report on October 18, 2024 ("DCA Report") wherein it reported its estimate of the obligation for all municipalities based upon its interpretation of the standards in the Amended FHA.
4. The DCA Report calculates the Township of Gloucester's Fourth Round (2025-2035) obligations as follows: a Present Need or Rehabilitation Obligation of 221 units and a Prospective Need or New Construction Obligation of 339 units.
5. The Amended FHA has established a January 31, 2025 deadline for municipalities to determine and accept its Fourth Round present and prospective affordable housing fair share obligations in order to maintain immunity from exclusionary zoning litigation by timely filing a resolution, attached hereto as Exhibit A, with the Affordable Housing Dispute Resolution Program ("Program").
6. The Township of Gloucester, by passing the Resolution attached hereto, commits to the Fourth Round Present Need and Prospective Need numbers produced by DCA and acknowledges that its fair share of affordable housing is cumulative, meaning it must also address the Prospective Need Obligations from the First, Second and Third Rounds, reflective of the prior Court-approved durational adjustments of some portion of its Prospective Need Obligations, as well as address the Fourth Round Present and Prospective Need.
7. In addition to the Resolution required by the Amended FHA, the Acting Administrative Director of the Courts issued Administrative Directive #14-24, dated December 13, 2024, and made available on December 18, 2024, mandating that a municipality seeking a certification of

compliance with the FHA shall file an action in the form of a declaratory judgment complaint in the county in which the municipality is located within 48 hours after adoption of the municipal resolution of fair share obligations (i.e. Exhibit A), or by February 3, 2025, whichever is sooner.

8. The Township of Gloucester reiterates its determination to voluntarily comply with the Amended FHA in order to maintain immunity from exclusionary zoning litigation and, thus, the Township of Gloucester files this Declaratory Relief action, in voluntary compliance with the requirement of the Administrative Directive #14-24, seeking a Fourth Round Compliance Certification.

9. Substantial activity has occurred, and still continues to occur, surrounding the Amended FHA since the legislation was signed into law that warrants the Township of Gloucester explicitly reserving certain rights to avoid any claim that it has waived them by filing this Declaratory Relief action.

10. The Amended FHA specifically provides that "[a]ll parties shall be entitled to rely upon regulations on municipal credits, adjustments, and compliance mechanisms adopted by COAH unless those regulations are contradicted by statute, including P.L. 2024, c.2, or binding court decisions" (N.J.S.A. 52:27D-311m) of which the municipality intends to utilize in the crafting of its Fourth Round Housing Element and Fair Share Plan.

11. The Township of Gloucester reserves all rights to adjust its position in the event of any rulings in the Montvale case (MER-L-1778-24) or any other such relevant action that alters the deadlines and/or requirements of the Amended FHA.

12. In the event of a third-party challenge of the calculations provided for in this Resolution, the Township of Gloucester reserves the right to take such position as it deems appropriate.

TOWNSHIP OF GLOUCESTER'S PRIOR ROUND HISTORY

13. Township of Gloucester filed an action which action was entitled In the Matter of the Application of the Township of Gloucester, Docket No. CAM – 2610-15.

14. A Final Judgment of Compliance was entered approving Township of Gloucester's Prior Round and Third Round Obligation to 2025.

15. The Township has fully satisfied its obligations as set forth in the Prior Round Obligations and the Third Round Obligation.

WHEREFORE

Petitioner, Township of Gloucester, respectfully requests that the Court enter judgment as follows:

A. Recognizing the Township of Gloucester's Binding Fair Share Obligation Resolution, attached hereto, committing to address the Township of Gloucester's Fourth Round Present Need and Prospective Need numbers calculated in the DCA Report, which Township of Gloucester's Declaratory Judgment filing timely addressed the deadlines established by the Amended FHA and the Administrative Directive #14-24 and affords the Township of Gloucester immunity from exclusionary zoning litigation.

B. Establishing the Township of Gloucester's Fourth Round obligation as follows:
221-unit Present Need or Rehabilitation Obligation; and 339-unit Prospective Need or New
Construction Obligation.

C. Declaring and granting the Township of Gloucester a Durational Adjustment of
some or all of its Fourth Round obligation pending the Township of Gloucester's future
preparation and submission of its Fourth Round housing element and fair share plan by the
Program's June 30, 2025 deadline.

D. Declaring and granting the Township of Gloucester a Fourth Round Compliance
Certification.

E. Awarding such other and further relief as the Court may deem equitable and
just.

CARLAMERE & ROWAN
David F. Carlamere Esq.
Attorney for Petitioner

Dated: 1/28/25


David F. Carlamere, Esq.

DESIGNATION OF TRIAL COUNSEL

Pursuant to the provisions of New Jersey Court Rule 4:25-4, David F. Carlamere,
Esquire, is hereby designated as trial counsel for Petitioner, Township of Gloucester.

Carlamere & Rowan
David F. Carlamere Esq.
Attorney for Petitioner

Dated: 1/28/25


David F. Carlamere, Esq.

RULE 1:38-7 CERTIFICATION

I hereby certify that confidential personal identifiers have been redacted from the documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b).

CARLAMERE & ROWAN
David F. Carlamere Esq.
Attorney for Petitioner

Dated: 1/28/25



David F. Carlamere, Esq.

RULE 4:5-1 CERTIFICATION

Pursuant to New Jersey Court Rule 4:5-1, I hereby certify that to the best of my knowledge, information, and belief, the matter in controversy is not the subject of any other action currently pending or contemplated in any court or arbitration proceeding, and that I know of no other party or parties at this time who should be joined, pursuant to Rule 4:28, or who are subject to joinder pursuant to Rule 4:29-1(b), in this action.

CARLAMERE & ROWAN
David F. Carlamere Esq.
Attorney for Petitioner

Dated: 1/28/25



David F. Carlamere, Esq.

EX A

R-25:01-051

**RESOLUTION OF THE TOWNSHIP COUNCIL OF THE TOWNSHIP OF
GLOUCESTER, CAMDEN COUNTY, NEW JERSEY ADOPTING FOURTH ROUND
FAIR SHARE AFFORDABLE HOUSING OBLIGATION AND OTHER ACTIONS**

WHEREAS, pursuant to the Fair Housing Act P.L. 2024, c.2, ("FHA") the State of New Jersey adopted legislation addressing the Fourth Round of affordable housing for the period 2025 to 2035; and

WHEREAS, pursuant to the FHA, the Department of Community Affairs ("DCA"), published Fourth Round preliminary obligations for each municipality in October of 2024; and

WHEREAS, the DCA calculated the Township of Gloucester as having a present need or rehabilitation share of 221 units and a prospective need share of 339 units for the Fourth Round; and

WHEREAS, pursuant to the FHA, every municipality in the State of New Jersey has an obligation to adopt a binding resolution establishing its fair share affordable housing obligation for the Fourth Round by January 31, 2025; and

WHEREAS, the Township's affordable housing professionals have reviewed the present need and prospective share published by the DCA and have recommended that the Township adopt these amounts as its Fourth Round Fair Share obligation; and

WHEREAS, the Township Council have reviewed this matter and agree to accept the recommendations of the Township's affordable housing professionals and take other necessary actions in connection with the FHA.

NOW, THEREFORE, BE IT RESOLVED, the Township Council of the Township of Gloucester, County of Camden and State of New Jersey hereby establishes its Fourth Round Affordable Housing Fair Share obligation as a present need or rehabilitation share of 221 units and a prospective need share of 339 units; and

BE IT FURTHER RESOLVED, that the Township of Gloucester's Fourth Round Affordable Housing Fair Share obligation is subject to vacant land adjustments and other amendments as may be provided for by law and the Township hereby reserves its right to adjust its Fourth Round Affordable Housing Fair Share obligation accordingly; and

BE IT FURTHER RESOLVED, that the Township's solicitor is hereby authorized to file an action in the form of a declaratory judgment complaint and civil case information statement within 48 hours after the adoption of this resolution.

BE IT FURTHER RESOLVED, that the Township's affordable housing professionals shall submit the Township into the DCA affordable housing dispute program and take any other action necessary to comply with the FHA and implement its Fourth Round Affordable Housing Fair Share obligation including, but not limited to defending any challenges to the Township's actions herein; and

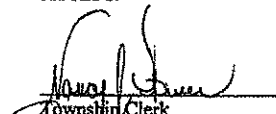
BE IT FURTHER RESOLVED, the Township also authorizes its affordable housing professionals to prepare the appropriate Housing Element and Fair Share Plan as a component of the Township's Master Plan so that is filed with DCA on or before June 30, 2025; and

BE IT FURTHER RESOLVED, that a copy of this Resolution shall be submitted to the DCA and posted on the Township website upon its adoption.

Adopted: January 27, 2025


President of Council
Orlando Mercado

ATTEST:


Township Clerk
Nancy Polver, RMC