

Housing Element and Fair Share Plan

Fourth Round

HADDON HEIGHTS BOROUGH, CAMDEN COUNTY, NJ

JUNE 2025

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Resolution 2025-6-3P.

Endorsed by Haddon Heights Borough Council on June __ 2025 .

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Haddon Heights Borough Housing Element and Fair Share Plan

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I. Introduction and Executive Summary

This Fourth Round Housing Element and Fair Share Plan (“HEFSP”) has been prepared for Haddon Heights Borough in accordance with the New Jersey Fair Housing Act (“FHA”) and the applicable rules of the New Jersey Council on Affordable Housing (“COAH”) at N.J.A.C. 5:93 et seq. There are four components of a municipality’s affordable housing obligation under the regulatory scheme that has evolved since the *Mount Laurel I* and *Mount Laurel II* decisions. Beginning with the First Round of affordable housing in 1987, municipalities wishing to proactively plan to accommodate opportunities for affordable housing may opt to participate in the fair share planning process. The four elements of the obligation are: the Fourth Round Present Need (Rehabilitation Share), the Prior Round Prospective Need (Cumulative First and Second Round), the Third Round Gap and prospective Need, and the Fourth Round Prospective Need. Since the 1980s Haddon Heights has been simultaneously pursuing the preservation of historic resources, redevelopment and revitalization of the downtown, conservation and maintenance of residential neighborhoods, and opportunities for affordable housing.

Haddon Heights Borough Fair Share Obligation	
Fourth Round Present Need /Rehabilitation Obligation	30
Prior Round Prospective Need	23
Third Round Gap and Prospective Need	107 ¹
Fourth Round Prospective Need	43

The Borough applied for and was granted vacant land adjustments in the Prior Round and the Third Round, with a Realistic Development Potential (RDP) of 16 units established in the Third Round Settlement Agreement. The Borough has fully satisfied the RDP of 16 with 9 supportive and special needs credits in 2 group homes, 5 rental units at Stanfill Commons, and 2 for sale units in the Kings Run condominium building. The RDP compliance is detailed in Section IV.C(1).

The Third Round Settlement Agreement established that the Borough would create opportunities for 29 affordable units to partially satisfy the unmet need. The Borough has shifted the means to provide the 29 units of unmet need, but is continuing to provide ample opportunity for the 29 units of unmet with 2 for sale units in the Kings Run condominium building, 8 rental units at Stanfill Commons, 2 rental units at Broken Ground apartments, 6 units at St Mary’s Redevelopment, 1

¹ Following Judge Jacobson’s 2018 decision In the Matter of the Application of the Municipality of Princeton, L-1550-15 (directly involving West Windsor and Princeton), Econsult Solutions Inc. used the workbooks from the decision to extrapolate Third Round obligations for all municipalities in the State. For Haddon Heights this Third Round number is 107. In 2016 when Haddon Heights entered into a Third Round Settlement Agreement with Fair Share Housing Center, the settlement established the Third Round prospective as 172. The Third Round number from the Jacobson decision is a 65-unit reduction from 172. Since Haddon Heights is a built-out municipality entitled to a vacant land adjustment, the reduction does not “change” the Borough’s Fair Share Plan, as the 65 unit difference is part of the “unmet need”. However, the Borough proposes to utilize the “Jacobson number” as the Third Round obligation.

rental unit at The Jefferson, and 10 rental units as part of inclusionary redevelopment in the Black Horse Pike Redevelopment Area. The Third Round unmet need compliance is detailed in section IV.C(2).

The Borough is requesting a continuation of the vacant land adjustment for the Fourth Round, and in accordance with N.J.S.A. 52:27D-310.1, must identify sufficient parcels likely to redevelop during the current round of obligations to address at least 25 percent of the prospective need obligation. The Borough will satisfy 25% (11 units) of the fourth round prospective need with a transitional housing site, 2 rental units in the Black Horse Pile Redevelopment Area, an inclusionary Redevelopment Plan to enable 4 additional rental units at The Jefferson (Block 36 lots 10, 11, 23) and an inclusionary redevelopment plan on Block 80 lots 1, 2, 2.01, 2.03 to enable 5 rental units. The proposals are detailed in section IV.D.

II. *Mount Laurel* Affordable Housing Background

A. Judicial Background

In the landmark 1975 decision in the case of *Southern Burlington County NAACP v. the Township of Mount Laurel*, (commonly known as *Mount Laurel I*), the New Jersey Supreme Court held that developing municipalities in New Jersey have a constitutional obligation to provide a realistic opportunity for the construction of low- and moderate-income housing in their communities. In its second significant *Mount Laurel* decision, decided on January 20, 1983 (*Mount Laurel II*), the Supreme Court expanded the *Mount Laurel* doctrine by determining that this constitutional responsibility to address the present need for affordable housing extended to all municipalities in New Jersey, and that the responsibility to address regional prospective need for affordable housing extended to all developing municipalities in New Jersey. The Court also established various remedies, including the “builder remedy” or court-imposed zoning, to ensure that municipalities affirmatively addressed this obligation.

In response to the *Mount Laurel II* decision, the New Jersey Legislature adopted the Fair Housing Act in 1985 (Chapter 222, Laws of New Jersey, 1985). The Fair Housing Act established the Council on Affordable Housing (COAH) as an administrative alternative to the courts. COAH was given the responsibility of dividing the state into housing regions, determining regional and municipal fair share affordable housing obligations, and adopting regulations that would establish the guidelines and approaches that municipalities may use in addressing their affordable housing need. COAH drafted regulations and calculated regional and municipal fair share numbers for Round 1 (1987-1993) and again for Round 2 (1993 -1999). However, the Round 2 methodology superseded the First-Round methodology and the cumulative period (1987-1999) became known as the “Prior Round”.

For the Third Round, which should have begun in 1999, COAH adopted regulations in 2004 intended to cover a ten-year period through 2014. In 2007 the first iteration of the Third Round rules were invalidated by a New Jersey Appellate Court decision, and COAH was ordered to propose

amendments to its rules. The second iteration of the Third Round rules were adopted in June and October of 2008. The rules were again challenged and ultimately invalidated by the Court in 2010. After being ordered by the NJ Supreme Court to do so, COAH then attempted to adopt a third set of Third Round regulations in 2014, but failed, resulting in additional challenges. These challenges lead to the Supreme Court's decision *In re Adoption of N.J.A.C. 5:96 & 5:97 by the N.J. Council on Affordable Housing*, 221 N.J. 1 (2015) ("*Mount Laurel IV*"), in which it held that since COAH was no longer functioning, trial courts were to resume their role as the form of first instance for evaluating municipal compliance with *Mount Laurel* obligations, and also established a transitional process for municipalities to seek a Judgment of Compliance and Repose ("JOR") in lieu of Substantive Certification from COAH.

While the Supreme Court's decision set forth a procedural path for municipalities to address their Third Round fair share obligations, it did not specifically assign those obligations. Instead, the fair share obligation was to be negotiated by the municipalities and Fair Share Housing Center and determined by the trial courts. The Supreme Court directed that the method of determining municipal housing obligations would be "similar to" the methodologies used in the Prior Round calculations. Additionally, the Court provided that municipalities should rely on COAH's Second Round rules (N.J.A.C. 5:93) and certain components of COAH's 2008 regulations that were specifically upheld, as well as the Fair Housing Act to guide planning for affordable housing, preparation of fair share plans, and implementation.

In 2017 the New Jersey Supreme Court determined that the "lost" period of time between 1999 and 2015 when no valid affordable housing regulations were in force, still generated an affordable housing obligation to address housing needs that continued to accrue during that time.² This time period became known as the "gap period" and is now a component of the Third Round obligation.

In 2018 Judge Jacobson decided a Third Round methodology In the Matter of the Application of the Municipality of Princeton, L-1550-15. As a result of this decision, which only legally applied to Princeton and West Windsor, Econsult Solutions, Inc. extrapolated a calculation of Statewide, regional, and municipal Third Round prospective need obligations that have been referenced and utilized by municipalities and the Courts in cases where a Third Round Fair Share Settlement had not been entered prior to that decision.

B. Legislative Background

The New Jersey Legislature has been both responsive to the *Mount Laurel* Judicial decisions and at times proactive in its efforts to craft a comprehensive planning and implementation response to the affordable housing mandate. Significant amendments to the Fair Housing Act were enacted in 2008 and 2024.

On July 17, 2008, P.L. 2008c. 46 (also referred to as A500) amended the Fair Housing Act. The following significant changes were made:

² The Third Round gap present need is a measure of low- and moderate-income households that formed from 1999 and 2015 and that were still in need of housing in 2015.

- It established a statewide 2.5% non-residential development fee payable to the municipal or State Affordable Housing Trust Fund instead of requiring non-residential developers to provide affordable housing;
- It eliminated new regional contribution agreements (“RCAs”) as a compliance technique available to municipalities. Prior to the change, a municipality could fund the transfer up to 50% of its fair share to a so called “receiving” municipality where the money would be used to create or rehabilitate affordable housing.
- It added a requirement that 13% of all affordable housing units be restricted to very low-income households, which it defined as households earning 30% or less of median income;
- It added a requirement that municipalities had to commit to spend development fees within four years of the date of collection.

On March 20, 2024 the legislature adopted P.L. 2024 c.2 which amended the Fair Housing Act and other related statutes. This amendment intends to provide a more predictable and consistent approach to affordable housing planning and implementation and to enable maximum production of low- and moderate-income housing units. The 2024 amendments to the Fair Housing Act are intended to implement the Mount Laurel doctrine and provides that municipalities in compliance with the Fair Housing Act are also in compliance with the Mount Laurel doctrine. The following are highlights of the 2024 amendments to the Fair Housing Act:

- The Council on Affordable Housing is formally abolished.
- The NJ Department of Community Affairs (“DCA”) is required to promulgate municipal obligations using an adjusted methodology set forth in the amended Fair Housing Act. The obligations are to be considered advisory, not binding, but any municipal adjustment to the fair share obligation must follow the methodology set forth in the law.
- Establishes timelines for the municipal compliance process and related challenges. Municipalities must abide by the timelines in order to retain immunity from exclusionary zoning lawsuits.
- Requires the New Jersey Housing and Mortgage Finance Agency and the DCA to update the Uniform Housing Affordability Controls (“UHAC”) along with other rules governing the production and administration of affordable housing.
- Establishes the Court- based Affordable Housing Alternate Dispute Resolution Program (“Program”) that is charged with resolving challenges to municipal determinations of fair share needs and compliance efforts.
- Provides for a minimum of 40 year control period for new affordable rental units;

- Modifies the criteria for affordable housing bonuses that may be claimed in municipal fair share plans.
- Establishes a specific timeline for the steps needed to establish municipal affordable housing obligations, to challenge the determinations, and to adopt a Housing Element and Fair Share Plan, in order for them to retain their immunity from exclusionary zoning litigation.
- Establishes new reporting and monitoring procedures and deadlines for both affordable units and affordable housing trust funds and assigns oversight for reporting and monitoring to DCA.

This Housing Element and Fair Share Plan has been prepared to address the essential components of a Housing Element (as required by N.J.S.A. 52:27D-310 and N.J.S.A. 40:55D-28), to meet the requirements of the FHA as most recently amended, and to meet the intent of Administrative Directive #14-24.

C. Haddon Heights Borough Affordable Housing History

Haddon Heights Borough adopted its first Housing Element in 1987 after the Council on Affordable Housing (COAH) finalized its First Round rules and municipal obligations. Haddon Heights proposed a vacant land adjustment and was granted substantive certification on August 3, 1987. The First Round certification expired in 1993. In 1994 COAH adopted its second set of substantive regulations and allocated municipal affordable housing obligations through 1999. The first round was recalculated, and the 1987 to 1999 period became cumulative. Haddon Heights' cumulative calculated need was determined to be 66 units (43 indigenous/rehabilitation need and 23 prospective need). In 1995 Haddon Heights prepared and filed its second round Housing Element and Fair Share Plan with COAH.

Haddon Heights adopted a Third Round Housing Element and Fair Share Plan in November 2009 in response to the second iteration of the Third Round rules and petitioned for substantive certification. However, the second iteration of the Third Round rules were invalidated in October of 2010.

Following the March 10, 2015 NJ Supreme Court decision (*Mount Laurel IV*), the Borough filed a declaratory judgement action and submitted itself to the new judicial process (on July 7, 2015). On October 20, 2016, Haddon Heights entered into a Third Round Settlement Agreement with Fair Share Housing Center which set the Third Round prospective need fair share obligation, accepted the Borough's vacant land adjusted RDP of 16, included an outline of proposed compliance mechanisms.

The Borough has continued to implement the Third Round Fair Share Plan, and to refine and modify it to respond to new information and emerging opportunities, while affirming its commitment to fulfill the obligation that it committed to. The Borough has now prepared this Fourth Round Housing Element and Fair Share Plan to ensure realistic opportunities for the production of additional affordable housing in redevelopment areas suited to accommodate new housing.

D. Timelines

N.J.S.A. 52:27D-304.1 provides that following the expiration of the Third Round of affordable housing on July 1, 2025, a municipality shall have immunity from exclusionary zoning litigation if the municipality complies with the deadlines established for both determining present and prospective obligations and for adopting a housing element and fair share plan to meet those obligations. The New Jersey Department of Community Affairs (DCA) prepared calculations of regional need and municipal present and prospective need obligations in accordance with the methodology and formulas established in 52:27D-304.2 and C.52:27D-304.3. These obligations are set forth in a report entitled "Affordable Housing Obligations for 2025-2035 (Fourth Round) Methodology and Background". The following is an overview of the timelines that are set forth in the amended Fair Housing Act for Fourth Round participation, and Haddon Heights' responses to the timeline.

1. January 31, 2025. For the fourth round of affordable housing obligations participating municipalities were required to determine their present and prospective fair share obligations by binding resolution no later than January 31, 2025.

Haddon Heights Borough adopted Resolution 2025:62 on January 21, 2025.

The Declaratory Judgement Action was filed with the program on January 23, 2025, Docket CAM-L-000224-25.

2. February 28, 2025. Challenges to the municipal determination were required to be filed by February 28, 2025.

Haddon Heights accepted the DCA's calculations and no challenges were filed.

3. March 31, 2025. Decisions on challenges to the municipally determined obligation shall be decided by the program by March 31, 2025 and an order will be entered by the vicinage's judge.

On March 28, 2025, by Order of Judge Schweitzer, the municipal fourth round prospective need obligation was fixed at 43 and the present need was fixed at 30.

4. June 30, 2025. Municipalities are required to adopt a housing element and fair share plan and propose drafts of the appropriate zoning and other ordinances and resolutions to

implement its present and prospective obligation by June 30, 2025, and file it with the Program.

5. August 31, 2025. Challenges to the adopted housing element and fair share plan alleging non-compliance with the Fair Housing Act must be filed by August 31, 2025.
6. March 15, 2026. The municipality shall adopt Implementing ordinances and resolutions by March 15, 2026.

E. Housing Element Requirements

Pursuant to both the Fair Housing Act (52:27D-310) and the Municipal Land Use Law (N.J.S.A. 40:55D-28 and -62), municipalities in New Jersey are required to include a housing element in their master plans. The land use element and the housing plan element are the foundations for the municipal zoning ordinance. The housing element is designed to provide information and perspective to guide the municipality toward identifying its present and prospective housing needs and to provide the foundations that will enable the municipality to provide access to affordable housing opportunities to meet the identified needs with particular attention to low- and moderate-income housing. The Fair Housing Act requires that the Housing Element include the essential elements outlined below (N.J.S.A. 52:27D-310).

- 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);
- h. For a municipality located within the jurisdiction of the Highlands Water Protection and Planning Council, established pursuant to section 4 of P.L.2004, c.120 (C.13:20-4), an analysis of compliance of the housing element with the Highlands Regional Master Plan of lands in the Highlands Preservation Area, and lands in the Highlands Planning Area for Highlands-conforming municipalities. This analysis shall include consideration of the municipality's most recent Highlands Municipal Build Out Report, consideration of opportunities for redevelopment of existing developed lands into inclusionary or 100 percent affordable housing, or both, and opportunities for 100 percent affordable housing in both the Highlands Planning Area and Highlands Preservation Area that are consistent with the Highlands regional master plan; 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.

F. Directive #14-24 Requirements

The March 20, 2024 amendments to the Fair Housing Act (P.L. 2024 c.2) established the Affordable Housing Alternate Dispute Resolution Program (the “Program”) within the Judiciary that is responsible for reviewing challenges to municipal fair share determinations and municipal compliance efforts. Administrative Directive #14-24 was issued to promulgate procedures and guidelines for implementing the Program. The Directive includes an Addendum outlining the elements to be included in the Housing Element and Fair Share Plan. These elements are outlined below.³

1. Detailed site suitability analyses, based on the best available data, for each of the un-built inclusionary or 100 percent affordable housing sites in the plan as well as an identification of each of the sites that were proposed for such development and rejected, along with the reasons for such rejection.

³ The Directive references consistency with an executed “Settlement Agreement”. However the Round 4 process does not require a settlement agreement at this juncture.

2. The concept plan for the development of each of the selected sites should be overlaid on the most up to date environmental constraints map for that site as part of its analysis. When the detailed analyses are completed, the municipality can see what changes will be needed (either to the selected sites or to their zoning) to ensure that all of the units required by the settlement agreement will actually be produced. If it becomes apparent that one (or more) of the sites in the plan does not have the capacity to accommodate all of the development proposed for it, the burden will be on the municipality either to adjust its zoning regulations (height, setbacks, etc.) so that the site will be able to yield the number of units and affordable units anticipated by the settlement agreement or to find other mechanisms or other sites as needed to address the likelihood of a shortfall.
3. The final HEFSP must fully document the creditworthiness of all of the existing affordable housing units in its HEFSP and to demonstrate that it has followed all of the applicable requirements for extending expiring controls, including confirmation that all of the units on which the controls have been extended are code-compliant or have been rehabilitated to code-compliance, and that all extended controls cover a full 30-year period beginning with the end of the original control period. Documentation as to the start dates and lengths of affordability controls applicable to these units and applicable Affordable Housing Agreements and/or deed restrictions is also required. Additionally, the income and bedroom distributions and continued creditworthiness of all other existing affordable units in the HEFSP must be provided.
4. The HEFSP must include an analysis of how the HEFSP complies with or will comply with all of the terms of the executed settlement agreement.

Once the HEFSP has been prepared, it must be reviewed by Fair Share Housing Center and the Program's Special Adjudicator for compliance with the terms of the executed settlement agreement, the Fair Housing Act (FHA) and Uniform Housing Affordability Controls (UHAC) regulations. The HEFSP must be adopted by the Planning Board and the implementation components of the HEFSP must be adopted by the governing body.

III. Housing Element Analysis

A. Demographic Characteristics

1. Population

The changes in population in Haddon Heights Borough, Camden County and the State of New Jersey from 1930 through 2024 are shown in Table 1. The population in 1930 was 71% of today's population. While some homes in Haddon Heights date to the 1700s, the development of the town as a bedroom community began in the 1890s with the location of a railroad station and a neighborhood plan. The town grew steadily in the 1940s (increase of 1,732) and 1950s (increase of 1,973). The population peaked in 1970 with 9,365 residents. From 1970 to 2010, the population declined, reaching a low of 7,473 in 2010. Since then the population has increased nominally to 7,588. The recent increase in population is likely the result of housing turnover during the covid pandemic, with more families moving into single family homes.

Table 1 Population Trends									
Year	Haddon Heights Borough			Camden County			New Jersey		
	Population	Change since last Census		Population	Change since last Census		Population	Change since last Census	
		Number	Percentage		Number	Percentage		Number	Percentage
1930	5,394	--	--	252,312	-	-	4,041,334	-	-
1940	5,555	161	3.0%	255,727	3,415	1.4%	4,160,165	118,831	2.9%
1950	7,287	1,732	31.2%	300,743	45,016	17.6%	4,835,329	675,164	16.2%
1960	9,260	1,973	27.1%	392,035	91,292	30.4%	6,066,782	1,231,453	25.5%
1970	9,365	105	1.1%	456,291	64,256	16.4%	7,168,164	1,101,382	18.2%
1980	8,361	-1,004	-12.0%	471,650	15,359	3.4%	7,364,823	196,659	2.7%
1990	7,860	-501	-6.4%	502,824	31,174	6.6%	7,730,188	365,365	5.0%
2000	7,547	-313	-4.1%	508,932	6,108	1.2%	8,414,350	684,162	8.9%
2010	7,473	-74	-1.0%	513,657	4,725	0.9%	8,791,894	377,544	4.5%
2020	7,495	22	0.3%	523,485	9,828	1.9%	9,288,994	497,100	5.7%
2024*	7,588	115	1.2%	533,988	10,503	2.0%	9,500,851	211,857	2.3%

Source: U.S. Census Bureau, Decennial Census and 2024 Population and Housing Unit Estimates * 2024 is an estimate

2. Population Composition by Age

According to the 2023 American Community Survey 5-year estimates, the median age of the residents of Haddon Heights in 2023 was 40.5 years. Analysis of age group characteristics provides insight into the demographic shifts and trends in a municipality. Changes in age group data reflect a number of demographic trends, which can be helpful in considering how the changes impact housing, community facilities and services needs for the municipality and the County overall. Between 2000 and 2020 the age composition of Haddon Heights has fluctuated among each age

cohort. While the population overall remained steady over the 20 year period, the number of children under the age of 14 has decreased by 11.4%. The number of adults aged 55 to 64 has increased by 56.9%. This is reflective of the demographic purchasing condominiums at the Kings Run development (age restricted) which was constructed after 2000, and the overall aging of the residential population. Over time, housing turnover will likely bring a new wave of younger families.

Table 2 Population by Age 2000 and 2020, Haddon Heights Borough						
Population	2000		2020		Change, 2000 to 2020	
	Number	Percentage	Number	Percentage	Number	Percentage
Total population	7,547	100%	7,495	100%	-52	-0.7%
Under 5 years	464	6.1%	426	5.7%	-38	-8.9%
5 to 14	1,027	13.6%	895	11.9%	-132	-14.7%
15 to 24	724	9.6%	819	10.9%	95	3.6%
25 to 34	913	12.1%	849	11.3%	-64	-7.5%
35 to 44	1,216	16.1%	938	12.5%	-278	-29.6%
45 to 54	1,138	15.1%	948	12.6%	-190	-20.0%
55 to 64	692	9.2%	1,086	14.5%	394	56.9%
65 and over	1,373	18.2%	1,342	17.9%	-31	-2.3%
Source: US Census Bureau, Decennial Census						

B. Housing Characteristics

There were 3,284 housing units in Haddon Heights as of 2023. The Borough's housing stock consists primarily of single-family houses (77.7%), followed by a substantial number of multi-family units in buildings containing 10 units or more (11.3%). The Borough's renter population occupies approximately 20.5% of the housing units compared to 35% for the County overall.

Table 3 Haddon Heights Borough Housing by Type of Structure and Tenure								
Number of Units in Structure	Owner-Occupied		Renter-Occupied		Vacant		Total	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
1, Detached	2,263	68.9%	204	6.2%	111	3.4%	2,551	77.7%
1, Attached	102	3.1%	10	0.3%	25	0.8%	137	4.2%
2	18	0.5%	76	2.3%	54	1.6%	148	4.5%
3 or 4	8	0.2%	35	1.1%	0	0%	43	1.3%
5 to 9	0	0%	33	1.0%	0	0%	33	1.0%
10 or more	56	1.7%	316	9.6%	0	0%	372	11.3%
Other	0	0%	0	0%	0	0%	0	0%

Total	2,447	74.5%	674	20.5%	163	5.0%	3,284	100%
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Source: US Census Bureau, 2019-2023 American Community Survey Five Year Estimates
Table B25024, Table B25032

The approximate age of Haddon Heights' housing stock is shown in Table 4. The median year of construction of all housing units in the Borough is 1945, which is substantially older than that of Camden County () and the State overall (1969). Only 3.7% of the Borough's housing stock was built after 2000, while 45.6% was built prior to 1940. Renter-occupied units in Haddon Heights are generally newer than owner-occupied units, as apartment complexes were constructed after the initial wave of single-family residential development.

Table 4								
Haddon Heights Borough Housing by Year Built and Tenure								
Year Built	Owner-Occupied		Renter-Occupied		Vacant		Total	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
2020 or later	14	0.4%	0	0%	0	0%	14	0.4%
2010 to 2019	25	0.8%	0	0%	0	0%	25	0.8%
2000 to 2009	32	1.0%	48	1.5%	0	0%	80	2.5%
1990 to 1999	28	0.9%	0	0%	0	0%	28	0.9%
1980 to 1989	20	0.6%	52	1.6%	13	0.4%	85	2.6%
1970 to 1979	71	2.2%	90	2.7%	0	0%	161	4.9%
1960 to 1969	76	2.3%	116	3.5%	0	0%	192	5.8%
1950 to 1959	732	22.3%	114	3.5%	54	1.6%	900	27.4%
1940 to 1949	268	8.2%	32	1.0%	100	3.0%	300	9.1%
1939 or earlier	1,181	36.0%	222	6.8%	96	2.9%	1,499	45.6%
Total	2,447	74.5%	674	20.5%	163	5.0%	3,284	100%
Median Year Built	1942		1957		(X)		1945	

Sources: Table B25034, Table B25036, and Table B25037 U.S. Census Bureau, 2019-2023 American Community Survey Five-Year Estimates

As shown in Table 5, 34.7% of all housing units in Haddon Heights contain four (4) bedrooms or more. Homes in Haddon Heights are larger relative to the County and State overall, where 24.6% and 25.6% of housing units have four or more bedrooms.

Table 5		
Haddon Heights Borough Housing by Number of Bedrooms		
Bedrooms per Unit	Units	Percent
Efficiency	33	1.0%
1 Bedroom	330	10.0%
2 Bedrooms	603	18.4%
3 Bedrooms	1,179	35.9%
4 Bedrooms	879	26.8%
5+ Bedrooms	260	7.9%
Total	3,284	100%
Source: Table DP04 U.S. Census Bureau, 2019-2023 American Community Survey Five-Year Estimates		

Between 2013 and 2023, housing values for owner occupied units in Haddon Heights increased by 25.5% (not accounting for inflation). The sharp increase in residential real estate values is consistent with a substantial increase in demand for residential real estate outside of major metropolitan areas beginning during the covid pandemic. In 2013, 42.2% of all owner-occupied homes in the Borough were valued at \$300,000 or more; by 2023, that had grown to 65.8%. Approximately 70.6% of homeowners in Haddon Heights have a mortgage or other debt on their property, while approximately 36.1% have no mortgage or debt on their property. This is consistent with the percentages of homeowners with and without mortgage debt in the County overall.

Table 6				
Haddon Heights Borough Value of Owner Occupied Housing Units				
Housing Unit Value	2013		2023	
	Units	Percent	Units	Percent
Less than \$50,000	36	1.6%	21	0.9%
\$50,000 to \$99,999	16	0.7%	10	0.4%
\$100,000 to \$149,999	51	2.2%	19	0.8%
\$150,000 to \$199,999	217	9.4%	44	1.8%
\$200,000 to \$299,999	1,011	43.9%	743	30.4%
\$300,000 to \$499,999	849	36.9%	1,148	46.9%
\$500,000 to \$999,999	94	4.1%	443	18.1%
\$1,000,000 or more	27	1.2%	19	0.8%
Total	2,301	100%	2,447	100%
Median Value	\$282,700		\$354,700	
Sources: Table DP04, U.S. Census Bureau, 2019-2023 American Community Survey Five-Year Estimates;				

Table 7
Mortgage Status
Haddon Heights Borough and Camden County, 2023 Estimates

	Haddon Heights		Camden County	
	Number	Percentage	Number	Percentage
Housing units with a mortgage, contract to purchase, or similar debt:	1,563	63.9%	84,561	64.8%
With either a second mortgage or home equity loan, but not both:	163	6.7%	8,827	6.8%
Second mortgage only	11	0.4%	1,067	0.8%
Home equity loan only	152	6.2%	7,477	5.7%
Both second mortgage and home equity loan	0	0%	283	0.2%
No second mortgage and no home equity loan	1,317	53.8%	72,476	55.6%
Housing units without a mortgage	884	36.1%	45,869	35.2%
Source: U. S. Census Bureau, 2019-2023 American Community Survey 5-Year Estimates, Table B25081				

The median rent in Haddon Heights in 2023 was \$1,036 dollars, compared to \$1,152 across Camden County overall. According to American Community Survey data there are 669 rental units in Haddon Heights where a contract rent is paid. There are significant numbers of rental units at different price points. The lower rents in Haddon Heights reflect an older inventory of rental units that are likely smaller than new construction apartments. The proposed rental units included in the Fair Share Plan will enable the construction of modern apartments with a substantial percentage of restricted affordable units.

Table 8 Contract Gross Rent Haddon Heights Borough and Camden County, 2023 Estimates				
	Haddon Heights Boro		Camden County	
	Units	Percent	Units	Percent
Total Renter Occupied Units	674	100%	70,139	100%
Less than \$200	14	2.1%	1,519	2.2%
\$200 to \$399	47	7.0%	3,383	4.8%
\$400 to \$599	53	7.9%	2,560	3.6%
\$600 to \$799	37	5.5%	4,445	6.3%
\$800 to \$999	168	25.0%	11,383	16.2%
\$1,000 to \$1,499	174	25.9%	27,552	39.3%
\$1,500 to \$1,999	147	21.8%	11,731	16.7%
\$2,000 to \$2,499	29	4.3%	3,692	5.3%
\$2,500 to \$2,999	0	0%	816	1.2%
\$3,000 to \$3,499	0	0%	329	0.5%
\$3,500 or more	0	0%	277	0.4%
No cash rent	5	0.7%	1,852	2.6%
Median Contract Rent	\$1,036		\$1,152	
Source: American Community Survey 2019-2023, 5-year estimates, Table B25056, Table 25058				

C. Households

Households are defined as one or more people, related or not, living together as a housekeeping unit. In 2023 there were 3,121 total households living in Haddon Heights Borough. Two-person households make up the largest household size at 34.4% of all households, which is comparable to County overall where 30.9% of households consist of two people. The average household size in Haddon Heights is 2.39 persons, which is lower than Camden County's average household size of 2.58. Only 10.8% of Haddon Heights's households are four person households, compared to 14.3% for the County overall.

According to the U.S. Census, family households are defined as two or more persons living in the same household related by birth, marriage, or adoption. As shown in Table 10 a majority of households in the Borough are categorized as family households (68.1%). Households in Haddon Heights consisting of a married couple with children under the age of 18 accounted for 22.4% of all households, compared with 20.2% for the County overall. Single parent households with children account for an additional 5.5% of all households in Haddon Heights.

Table 9 Household Size- Occupied Housing Units, 2023 Haddon Heights Borough and Camden County				
	Haddon Heights Borough		County	
	Number	Percent	Number	Percent
Total Households	3,121	100%	200,569	100%
1-person household	887	28.4%	56,730	28.3%
2-person household	1,075	34.4%	61,970	30.9%
3-person household	601	19.3%	33,889	16.9%
4-person household	337	10.8%	28,587	14.3%
5-person household	137	4.4%	12,074	6.0%
6-person household	47	1.5%	4,489	2.2%
7-or-more-person household	37	1.2%	2,830	1.4%
Average Household Size	2.39		2.58	
Source: American Community Survey 2019-2023, 5-year estimates Table B25009 and S1101				

Table 10 Household Size and Type, 2020 Haddon Heights Borough		
	Total	Percent
Total Households	3,009	100%
Family households	2,048	68.1%
Married Couple Family	1,657	55.1%
With own children under 18 years	675	22.4%
No children under 18 years	982	32.6%
Other Family	391	13.0%
Male householder, no spouse present	99	3.3%
With own children under 18 years	40	1.3%
Female householder, no spouse present	292	9.7%
With own children under 18 years	125	4.2%
Nonfamily Households	132	4.4%
Male householder	68	2.3%
Female householder	64	2.1%
Average Family Size	2.39	
Source: US Census Bureau,American Community Survey 2019-2023, 5-year estimates Table S1101		

D. Income Characteristics

1. Household Income

As measured in by the American Community Survey 2023 5-year estimate, Haddon Heights has significantly higher median household income than that of Camden County and the State of New Jersey overall. In 2023, the median household income in Haddon Heights was \$126,055, which is \$39,671 more than Camden County overall and \$25,005 more than the State overall. Per capita income in Haddon Heights is \$63,925 compared to \$44,380 in Camden County and \$53,118 for the State overall. This underscores the differences in household and family size. Haddon Heights's household income is high relative to the County and State and also has a relatively small average household size at this time.

Table 11 Per Capita and Household Income		
	2023 Per Capita Income	2023 Median Household Income
Haddon Heights Boro	\$63,925	\$126,055
Camden County	\$44,380	\$86,384
New Jersey	\$53,118	\$101,050
Source: 2023 American Community Survey 5-year Estimates, Tables 19013 and 19301		

The distribution of household income for Haddon Heights is provided in Table 12 below. The highest percentage of households (24.9%) fall into the \$200,000 or more income bracket. This category is followed by those households that earned \$100,000 to \$149,999 (21.4%). In Haddon heights, 16.1 percent of households earned less than \$50,000, compared to 29.9 percent of the County's households overall.

Table 12 Household Income Haddon Heights Borough and Camden County, 2023				
	Haddon Heights Boro		Camden County	
	Number	Percentage	Number	Percentage
Total Households	3,121	100%	200,569	100%
Less than \$10,000	60	1.9%	10,455	5.2%
\$10,000 to \$14,999	22	0.7%	7,162	3.6%
\$15,000 to \$24,999	120	3.8%	12,319	6.1%
\$25,000 to \$34,999	161	5.2%	12,680	6.3%
\$35,000 to \$49,999	139	4.5%	17,492	8.7%
\$50,000 to \$74,999	390	12.5%	28,387	14.2%
\$75,000 to \$99,999	346	11.1%	24,794	12.4%
\$100,000 to \$149,999	669	21.4%	38,109	19.0%
\$150,000 to \$199,999	437	14.0%	21,882	10.9%
\$200,000 or more	777	24.9%	27,289	13.6%
Median Household Income	\$126,055		\$86,384	
Source: 2019-2023 American Community Survey 5-year Estimates, Tables B19001 and B19013				

2. Poverty Rates

The 2025 Federal Poverty Guidelines define poverty by income thresholds. For a one-person household the Federal poverty income is \$15,650, for a two-person household it is \$21,150, for a three-person household it is \$26,650 and for a four-person household it is \$32,150. Eligibility for assistance programs often use percentages of the federal poverty level to determine eligibility. Since New Jersey is a high-income state with high cost of living, State programs typically use a higher income threshold (such as 138% of the Federal Poverty Level).

Table 13		
	Families	Individuals
Haddon Heights Borough	1.4%	2.4%
Camden County	9.1%	12.2%
Source: US Census Bureau, 2019-2023 American Community Survey 5 year estimates, Tables S1701 and S1702		

3. Income Limits and Rents

In order to be eligible for deed restricted affordable housing in New Jersey, a household's income must be below the income limit for the region in which the housing is located. Generally, housing is considered affordable for a household if no more than 30% of gross income is spent on housing costs. Restricted affordable housing is made affordable for households earning up to 80% of the

median income in the region. The Fair Housing Act and the Uniform Housing Affordability Controls (N.J.A.C. 5:80-26.1) define very-low income households (those earning up to 30% of the median household income for the region), low-income households (those earning up to 50% of the median household income for the region) and moderate-income households (those earning from 50% to 80% of the median household income for the region). The maximum income figures are adjusted for household size and the municipality's geographic location within the State (there are six regions) and are updated yearly.

The Uniform Housing Affordability Controls (UHAC) provide that the maximum rent for a qualified affordable unit must be affordable to households that earn no more than 60% of the median income for the region and 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. Each time an affordable housing development or unit is being prepared for market, the rent or sales price is calculated by the Borough's or the developer's certified administrative agent.

Haddon Heights is located within region five, which includes Burlington, Camden and Gloucester Counties. Deed restricted affordable housing units must be made affordable to a mix of very low-income, low-income, or moderate-income households. The maximum income depends on the number of people in the household. The table below shows 2025 maximum income limits for households of different sizes in Region 5.

Table 14			
2025 Region 5 Income Limits by Household Size			
# Persons	Very Low Income	Low Income	Moderate Income
1	\$25,080	\$41,800	\$66,880
2	\$28,680	\$47,800	\$76,480
3	\$32,250	\$53,750	\$86,000
4	\$35,820	\$59,700	\$95,520
5	\$38,700	\$64,500	\$103,200
6	\$41,580	\$69,300	\$110,880
Source: NJHMFA, Effective May 16, 2025			

The table below shows Illustrative affordable rents in region 5.

Table 15 2025 Illustrative Rents for Region 5				
	unit type	% of median income	Gross rent (all utilities included)	FINAL RENT: Net Rents (Minus utilities not included)
1 Bedroom				
	VL	30.00%	\$672	\$418
	LOW	50.00%	\$1,120	\$866
	MOD	60.00%	\$1,344	\$1,090
2 Bedroom				
	VL	30.00%	\$806	\$502
	LOW	50.00%	\$1,344	\$1,040
	MOD	60.00%	\$1,613	\$1,309
3 Bedroom				
	VL	30.00%	\$932	\$573
	LOW	50.00%	\$1,553	\$1,194
	MOD	60.00%	\$1,863	\$1,504
Source: CGP&H, May 2025				

The table below shows illustrative affordable sales prices in region 5.

Table 16 Region 5 Illustrative Affordable Sales Prices (\$250 HOA fees, 6.73% interest rate)			
	Income	% of Median	Sale Price
1 BR			
	Very Low	30.00%	\$45,891
	Low	50.00%	\$96,763
	Mod	60.00%	\$ 122,198
	Mod	65.00%	\$134,916
	Mod	70.00%	\$147,634
2 BR			
	Very Low	30.00%	\$ 61,136
	Low	50.00%	\$122,170
	Mod	60.00%	\$152,687
	Mod	65.00%	\$167,946
	Mod	70.00%	\$183,204
3 BR			
	Very Low	30.00%	\$75,358
	Low	50.00%	\$145,874
	Mod	60.00%	\$181,132
	Mod	65.00%	\$198,761
	Mod	70.00%	\$216,390
Source CGP&H, May 2025			

Affordable sales prices vary depending on Homeowner Association (HOA) fees, current property taxes, and current mortgage interest rates.

E. Housing Affordability

1. For Sale Housing Units

Based on CGP&H's 2025 illustrative sales price numbers, as many as 46 housing units (in 2023) may be affordable to very low-income households (depending on the number of bedrooms in the unit). As many as 320 (13.9%) of for sale units may be affordable to low- and moderate-income households overall (depending on the number of bedrooms in the unit).

2. For Rent Housing Units

Based on CGP&H's 2025 illustrative rents, as many as 114 units, or 17%, of rental units in the Borough may be affordable to very low-income renters, depending on the number of bedrooms being rented (based on 2023 rents). Meanwhile, 493 units (73.4% of rental units) may be affordable to low- or moderate-income renters depending on the unit size. According to the American Community Survey data, nearly three-fourths of the rental units in the Borough may be

affordable to low- or moderate-income households depending on the number of bedrooms being rented.

Housing is generally considered to be affordable if the costs of rents, mortgages, and other essential costs consume 28% or less of an owner-household's income or 30% or less of a renter-household's income. Homeowner rates are lower to account for the additional home maintenance costs associated with ownership. In Haddon Heights, 19.9% of all households in owner occupied units are expending more than 30% of their income on housing, and 25% of renter households are spending more than 30% of their income on housing.

Table 17 Haddon Heights Borough Housing Affordability						
Monthly Housing Costs as % of Income	Owner Occupied		Renter Occupied		All	
	Units	Percent	Units	Percent	Units	Percent
Less than 20%	1,380	56.4%	246	36.5%	1,626	52.1%
20 to 29%	577	23.6%	123	18.25%	700	22.4%
30% or more	487	19.9%	295	43.7%	782	25.1%
Not Computed	3	0.1%	10	0.4%	13	0.4%
Total	2,447		674		3,121	100%
Remaining occupied units have zero income and/or no cash rent						
Source: 2019-2023 American Community Survey Table DP04						

F. Substandard Housing Capable of Being Rehabilitated

Approximately 88% of Haddon Heights' housing stock, was constructed before 1970. Overall housing in Haddon Heights is well maintained, and homeowners take pride in the upkeep and preservation of their properties. In some communities, older housing units are the most likely to be substandard or in need of rehabilitation. However, in Haddon Heights the older housing stock gives the Borough its character and value has been preserved.

The present need (or rehabilitation need) is defined by the FHA as the number of substandard existing deficient housing units currently occupied by low-and moderate-income households. The present need (rehabilitation) fair share obligation is calculated using three proxy factors for each municipality including (a) the number of housing units lacking complete kitchen facilities, (b) the number of units lacking complete plumbing facilities and (c) the number of overcrowded units more than 50 years old that are occupied by low- and moderate-income households. The proxy data is intended to reflect the number of substandard units in the municipality occupied by low-and moderate-income households that may be in need of rehabilitation. The data is based on tabulations of survey responses. The DCA's calculation methodology is intended to account for overlap.

According to the American Community Survey Five Year Estimates, in 2023, there were 5 housing units in Haddon Heights that were overcrowded (more than 1 person per room) and were in

structures that were built before 1950. Eighty four units had incomplete kitchen facilities and no units had incomplete plumbing facilities. These conditions are used in New Jersey's affordable housing methodology as indicators of housing deficiency (but differ from the numbers used in DCA's calculations). However, the incomplete plumbing and kitchen scenarios are increasingly rare and may be misreported by individuals living in group quarters.

While there are very likely housing units in the Borough that are occupied by low or moderate income households that are in need of repair or replacement of one or more major systems, the Borough questions the validity of the present need calculation and the appropriateness of the proxy factors. The Borough's tax assessor, zoning officer, and other professionals do not believe that there are truly 84 units in the Borough without complete kitchens.

Table 18 Haddon Heights Deficient Housing Units			
	Incomplete Plumbing	Incomplete Kitchen	Crowded and Build Prior to 1950
Number of Units	0	84	5
Source: 2019-2023 American Community Survey Five-Year Estimate Tables B25050 and B25051			

G. Employment Data

1. Labor Force Estimates

Table 19 details changes in employment among Haddon Heights residents from 2007 through 2024. The numbers are estimates from the New Jersey Department of Labor and Workforce Development. Employment among Haddon Heights residents in the labor force has remained relatively stable since 2007. The unemployment rate trend in Haddon Heights has generally tracked with the unemployment rate trend in the County, though unemployment rates at the county level are higher at the County level. Unemployment in Haddon Heights increased during the recession in 2009 and lasted through 2013, when the employment rate began to decline, until 2020 when unemployment jumped up again during the global covid pandemic. The covid induced unemployment in Haddon Heights (6.8%) was less severe than in the County overall (9.8%), likely because of the jobs held by many Haddon Heights residents, including many healthcare workers, and professionals who may have the ability to work from home.

Table 19 Employment and Resident Labor Force—Haddon Heights Borough				
Year	Labor Force	Employment	Unemployment	Unemployment Rate
2007	4,025	3,894	131	3.3%
2008	4,080	3,919	161	3.9%
2009	4,100	3,819	281	6.9%
2010	3,894	3,663	231	5.9%
2011	4,177	3,901	276	6.6%
2012	4,056	3,768	288	7.1%
2013	4,021	3,752	269	6.7%
2014	3,940	3,759	181	4.6%
2015	4,069	3,909	160	3.9%
2016	3,979	3,847	132	3.3%
2017	4,011	3,894	117	2.9%
2018	3,991	3,880	111	2.8%
2019	4,046	3,946	100	2.5%
2020	3,988	3,716	272	6.8%
2021	4,007	3,824	183	4.6%
2022	4,101	3,989	112	2.7%
2023	4,181	4,061	120	2.9%
2024	4,201	4,076	125	3.0%
Source: New Jersey Department of Labor and Workforce Development Labor Force Estimates				

2. Class of Worker

According to the American Community Survey data, the vast majority of workers (77%) living in Haddon Heights in 2023 were part of the private wage and salary worker group. This group includes people who work for wages, salary, commission, and tips for a private for-profit employer or a private not-for-profit, tax-exempt or charitable organization. The second largest category was government worker (19%), followed by those who were self-employed (3.6%).

Table 20 Class of Worker Haddon Heights Borough, 2023 Estimates		
	Number	Percentage
Employed Civilian population 16 years and over	4,066	100.0%
Private Wage and Salary Worker	3,131	77.0%
Government Worker	773	19.0%
Self-Employed Worker	146	3.6%
Unpaid Family Worker	16	0.4%

Source: 2023 American Community Survey 5-Year Estimates, Table DP01

3. Employment by Industry

The table below indicates the industries that Haddon Heights residents work in. According to the 2023 American Community Survey 5 year estimates, there were 4,066 employed Haddon Heights residents in 2023.

Table 21 Resident Employment by Industry 2023		
Private Sector Category	Number of Jobs	Percent
Agriculture, forestry, fishing and hunting, and mining	0	0%
Construction	269	6.6%
Manufacturing	220	5.4%
Wholesale trade	115	2.8%
Retail trade	321	7.9%
Transportation and warehousing, and utilities	191	4.7%
Information	97	2.4%
Finance and insurance, and real estate and rental and leasing	203	5.0%
Professional, scientific, and management, and administrative and waste management services	736	18.1%
Educational services, and health care and social assistance	1,254	30.8%
Arts, entertainment, and recreation, and accommodation and food services	323	7.9%
Other services, except public administration	99	2.4%
Public administration	238	5.9%
Total Covered Employment	4,066	100%
Source: Source: 2023 American Community Survey 5-Year Estimates, Table DP03		

4. Haddon Heights Borough Employment by Sector

There is limited information available about actual jobs and employers within individual municipalities. The New Jersey Department of Labor collects quarterly information on covered employment, which is employment and wage data for employees covered by unemployment insurance. This data excludes small businesses, self-employed people, part-time workers, and some agricultural work that is not covered by unemployment. The U.S. Census Bureau's Center for Economic Studies also tracks "covered employment" for various geographic areas. Covered employment data includes only those jobs for which unemployment compensation is paid. The data shows that there are 1,640 jobs in Haddon Heights, whereas there are 4,066 residents in the labor force. This imbalance defines Haddon Heights as a bedroom community.

Table 22 Average Number of Haddon Heights Establishments and Employees by Industry			
Industry ID and Description		Avg Units	Avg Employment
	Local Govt	3	313
61	Local Govt- Education	1	257
11	Agriculture	-	-
23	Construction	21	78
31	Manufacturing	-	-
42	Wholesale Trade	9	43
44	Retail Trade	12	68
48	Transportation/Warehousing	-	-
51	Information	-	-
52	Finance/Insurance	12	87
53	Real Estate	5	12
54	Professional/Technical	37	295
55	Management	-	-
56	Admin/Waste Remediation	15	52
62	Health/Social	53	593
71	Arts/Entertainment	-	-
72	Accommodation/Food	12	94
81	Other Services	19	86
99	Unclassifieds	5	8
	Private Sector Totals	215	1,640
Source: NJ Department of Labor & Workforce Development, Quarterly Census of Employment and Wages by sector, 2023.			

H. Population and Housing Projections

The Delaware Valley Regional Planning Commission ("DVRPC") is the Metropolitan Planning Organization ("MPO") for all of Region 5, including Camden County, and publishes population and employment projections. The DVRPC projects that Haddon Heights' population will decrease by .9% and employment will increase by 10.4%, from 2020 to 2050.

As Table 23, Population, and Employment Projections, 2020 to 2050 shows, population growth and employment growth are projected to be relatively consistent with that of the County (+1.2% population) and (+13.0% employment). Haddon Heights is a built-out municipality, so without redevelopment, and with the trend toward smaller household sizes, population would likely decline. However, the Borough aims to identify redevelopment opportunities that will offer the potential for small-scale residential developments.

Table 23						
Population, and Employment Projections, 2020 to 2050						
	Haddon Heights Borough			Camden County		
	2020	2050	% Change	2020	2050	% Change
Population	7,495	7,431	-0.9%	523,485	529,692	1.2%
Employment	4,581	5,059	10.4%	264,617	299,051	13.0%
Source: DVRPC County and Municipal Population and Employment Forecasts 2020-2050						

The Fair Housing Act requires that the Housing Element include 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.

Table 24 Haddon Heights Borough Residential COs and Demolition Permits Issued			
Year	Certificates of Occupancy	Demolitions	Net New Dwellings
2013	4	0	4
2014	21	4	17
2015	13	0	13
2016	18	0	18
2017	10	0	10
2018	2	1	1
2019	1	2	-1
2020	0	0	0
2021	0	0	0
2022	0	0	0
2023	0	0	0
Total	69	7	62
Annual Average	6.9	0.7	6.2
Ten Year Projection			62
Source: NJDCA Construction Reporter, Yearly Summary Data			

Though the DCA's Construction Reporter data indicates that 62 certificates of occupancy have been issued in Haddon heights over the ten-year period between 2013 and 2023, this number does not specifically inform the Borough's growth projection for the next ten years. Since Haddon Heights is a built-out community, growth is not linear and cannot be projected based on the availability of infrastructure or vacant land. Residential growth depends on the availability of redevelopment sites, the ability of would-be developers to assemble land, and the willingness of the municipality to plan for and enable redevelopment. Haddon Heights' leaders have been proactive over the last 5 years in encouraging and facilitating high quality inclusionary redevelopment opportunities in locations able to accommodate reuse and/or redevelopment. The following table includes information about approved and projected development.

Table 25 Haddon Heights Borough Anticipated Residential Development 2023-2035				
Development Name	Unit Type	Status	# of Units	Projected Completion
Broken Ground Redevelopment 501 Station Ave	All Age Apartments	Approved	12	2027
St Mary's Redevelopment	Age-Restricted Apartments	Pending	37	2027
The Jefferson Redevelopment 322-324 White Horse Pike	All Age Apartments	Approved	5	2026
The Jefferson Expansion	All Age Apartments	Conceptual	20	2029
Kings Highway Block 80 Lots 1, 2, 2.01, 2.03	Apartments	Conceptual	35	2031
Black Horse Pike Redevelopment	Apartments	Conceptual	60	2032
Total Projected Housing Units through 2035			169	
Total Projected Affordable Housing Units Through 2025			26	

I. Consideration of Lands Appropriate for Affordable Housing and Consistency with the State Development and Redevelopment Plan

The Fair Housing Act requires that a municipal housing element must include consideration of lands most appropriate for construction of low- and moderate-income housing and existing structures most appropriate for conversion, or rehabilitation for low- and moderate-income housing. The evaluation must include a consideration of lands of developers who have expressed a commitment to provide low- and moderate-income housing. The Act further requires an analysis of consistency with the State Development and Redevelopment Plan.

The Borough has and will continue to foster positive working relationships with potential redevelopers. Three redevelopers who have approached the Borough about residential redevelopment projects over the last several years have worked with the Borough to establish the foundations for contextually appropriate inclusionary redevelopment projects. The redevelopers and the Borough (including the Historic Preservation Commission when appropriate) have coordinated to establish mutually agreeable site and building design requirements, and the Borough has adopted inclusionary redevelopment plans. As a means to provide additional affordable housing opportunities through redevelopment, the Borough's forthcoming redevelopment plans will set clear expectations and will aim to incentivize inclusionary redevelopment while upholding the Borough's site and design standards. The compliance proposals are explained in section IV.C and D.

Haddon Heights Borough has a sanitary sewer system that dates back to 1911, with expansions in 1923, 1929 and the 1950s. The system consists of three pump stations, approximately 115,000 linear feet of gravity sewer main, 6,600 feet of sanitary force main, and 414 manholes and

chambers. The Borough's system connects to the Camden County Municipal Utilities Authority's conveyance system, which conveys wastewater to the treatment facility in Camden City. New Jersey American Water company provides water service to Haddon Heights.

The entirety of Haddon Heights Borough is within Planning Area 1, the metropolitan planning area, on the New Jersey State Plan Policy Map. The adjacent areas in the neighboring towns are also within Planning Area 1. Planning Area 1 is a "smart growth area" where development and redevelopment are encouraged. It is the intent of the metropolitan planning area to revitalize cities and towns, promote growth in compact forms, and protect the character of existing stable communities. The Borough aims to increase the supply of affordable housing units by identifying areas that may be ripe for redevelopment and where additional housing will meet multiple local, County, and State planning objectives. The creation of inclusionary redevelopment plans will enable redevelopment and revitalization consistent with the goals and policies of the State Plan and will provide opportunities for the preservation of community assets and the provision of needed housing in compact and pedestrian friendly locations close to shopping, community amenities, transportation infrastructure and employment opportunities. The Planning Areas from the State Plan Policy Map and the Sewer Service Area are shown on **Map 1**.

J. Consistency with Recommendations of Multigenerational Family Housing Continuity Commission

The Fair Housing Act requires that the Housing Element consider the extent to which municipal ordinances and other local factors advance or detract from the goals of preserving multi-generational family continuity as expressed in the recommendations of the Multigenerational Family Housing Continuity Commission, established pursuant to paragraph (1) of subsection f. of 23 section 1 of P.L.2021, c.273 (C.52:27D-329.20). As of the time of the preparation of this Housing Element and Fair Share Plan, the Commission has not issued a report. The Borough supports multi-generational housing.

IV. Fair Share Plan

The Fair Housing Act at N.J.S.A. 52:27D-310 requires that the housing element include a determination of the municipality's present and prospective fair share and its capacity to accommodate the present and prospective housing needs as established in N.J.S.A. 52:7D-304.1. As required by the law, the Department of Community Affairs calculated Fourth Round regional affordable housing need and allocated the need to municipalities in accordance with the methodology and formulas established in the law.

The Borough's cumulative affordable housing obligation consists of four components that have accrued since the "first round" of affordable housing beginning in 1987. The four components are: the Fourth Round Present Need obligation ("Rehabilitation Share"), the Prior Round obligation (combined First and Second Round), the Third Round Gap and Prospective Need obligation, and the Fourth Round Prospective Need obligation. Present Need resets with each round of affordable housing based on an evaluation of census data relating to the number of deficient housing units occupied by low- and moderate-income households existing at the beginning of that round. The obligation in the Prior Round, Third Round, and Fourth Round is also known as "Prospective Need" which refers to the provision of affordable housing necessary to address the demand for housing based on regional population growth and household formation. The Third Round covers an extended period of time and includes the "Gap" Need obligation covering 1999 to 2015 and the Third Round Prospective Need obligation covering 2015 to 2025.

Haddon Heights Borough Fair Share Obligation	
Fourth Round Present Need /Rehabilitation Obligation	30
Prior Round Prospective Need	23
Third Round Gap and Prospective Need	107 ⁴
Fourth Round Prospective Need	43

The Affordable Housing sites are shown on Map 2.

A. Present Need/Rehabilitation Share

In accordance with the amended Fair Housing Act, a municipality's present need obligation shall be determined by estimating the existing deficient housing units currently occupied by low- and

⁴ Following Judge Jacobson's 2018 decision In the Matter of the Application of the Municipality of Princeton, L-1550-15 (directly involving West Windsor and Princeton), Econsult Solutions Inc. used the workbooks from the decision to extrapolate Third Round obligations for all municipalities in the State. For Haddon Heights this Third Round number is 107. In 2016 when Haddon Heights entered into a Third Round Settlement Agreement with Fair Share Housing Center, the settlement established the Third Round prospective as 172. The Third Round number from the Jacobson decision is a 65-unit reduction from 172. Since Haddon Heights is a built-out municipality entitled to a vacant land adjustment, the reduction does not "change" the Borough's Fair Share Plan, as the 65 unit difference is part of the "unmet need". However, the Borough proposes to utilize the "Jacobson number" as the Third Round obligation to bring the total unmet need down to 114.

moderate-income households within the municipality, following a methodology comparable to the methodology used to determine third round present need, through the use of datasets made available through the federal decennial census and the American Community Survey, including the Comprehensive Housing Affordability Strategy dataset thereof. (N.J.S.A. 52:27D-304.3(7)(b))

The Present Need affordable housing obligation number is intended to reflect the number of existing deficient housing units currently occupied by low- and moderate-income households that are in need of rehabilitation. The number is calculated using three proxy factors including (a) the number of housing units lacking complete kitchen facilities, (b) the number of units lacking complete plumbing facilities and (c) the number of overcrowded units more than 50 years old that are occupied by low- and moderate-income households (applying a calculated percentage of units occupied by LMI households). The available data is based on tabulations of survey responses.

According to the DCA's evaluation of HUD's Comprehensive Housing Affordability Strategy dataset there are 34 owner occupied homes in Haddon Heights that lack complete kitchen or plumbing facilities, and that 88.2% of those are occupied by low- and moderate-income households. The Borough's present need (rehabilitation) obligation is therefore 30 units.

The Borough's tax assessor, zoning officer, and planner are not aware of any units lacking a complete kitchen or plumbing system. The 2015 present need obligation was 15 units. It seems unlikely that 15 additional units "lost" kitchen or plumbing facilities over the last 10 years. There is some concern that some of the 30 units could be responses from individuals living in congregate care facilities or group homes. The Borough believes that there are residential units in need of repair or improvement of major systems that would benefit from a rehabilitation program, but there is doubt about the obligation assigned by DCA.

The Borough participates in the Camden County Home Improvement Program, which provides 0% interest loans of up to \$20,000 to income qualified residents of the Borough to correct substandard housing conditions and to eliminate health and safety hazards. Ten Haddon Heights households have participated in the program since 1994. The Borough will continue participating in the County program.

Additionally, the Borough will conduct a structural conditions survey (exterior housing survey) to enable a more thorough and accurate review of the housing stock and to evaluate the need for rehabilitation. Following completion of the structural conditions survey, and the calculation of the number of units occupied by low- and moderate-income households, the Borough will consider the need to initiate a municipal rehabilitation program, or to enter into a consortium agreement with other nearby municipalities to provide more residents with access to rehabilitation funds. The results of the structural conditions survey (exterior housing survey) will be submitted as an appendix to this plan by December 31, 2025. In the interim, links to the County Home Improvement Program will be provided on the Borough website.

If it is determined that a municipal rehabilitation program is needed to accelerate the Borough's ability to satisfy its present need obligation, a Rehabilitation Program Manual will be prepared to

describe the basic content and operation of the rehabilitation program, outline program purposes and provide the guidelines for implementing the program. The manual will also explain the steps in the rehabilitation process. It will describe the eligibility requirements for participation in the program, program criteria, funding terms and conditions, cost estimating, contract payments, record keeping and overall program administration. The Program Manual will be added to this Fair Share Plan as an appendix when it is completed.

B. Vacant Land Adjustment

When municipalities lack sufficient vacant developable land to address the entirety of the prospective need obligation, COAH's rules (at N.J.A.C. 5:93-4.2) have provided that an adjustment may be made based on an analysis of vacant and developable land within the municipality. The rules provided that municipalities seeking adjustment should submit an inventory of vacant parcels by lot and block that includes the acreage and owner of each lot. The rules outline what conditions warrant elimination of a site (or part of a site) from the inventory. The parcels of land not eliminated from the inventory are required to be utilized together with a presumptive density (minimum of 6 du/acre) and a presumptive affordable housing set aside (20%) to establish the "realistic development potential" for affordable housing in the municipality.

Haddon Heights has applied for and has been granted a vacant land adjustment in each "round" of affordable housing. Most recently, the Third Round settlement agreement between Haddon Heights and Fair Share Housing Center, signed by the Borough on October 18, 2016, provided that the Borough had a realistic development potential ("RDP") of 16 units and an "unmet need" of 179 units.⁵ The Court entered a final judgement of compliance in favor of Haddon Heights on December 16, 2016. The Borough's Third Round Housing Element and Fair Share Plan provided the means to satisfy the RDP (detailed in section IV C below).

A similar vacant land adjustment process is now provided for in the Fair Housing Act at N.J.S.A. 52:27D-310.1. The Fair Housing Act provides that any municipality that receives an adjustment of its prospective need obligations for the fourth round or subsequent rounds based on a lack of vacant land shall, as part of the process of adopting and implementing its housing element and fair share plan, identify sufficient parcels likely to redevelop during the current round of obligations to address at least 25 percent of the prospective need obligation that has been adjusted, and adopt realistic zoning that allows for such adjusted obligation, or demonstrate why the municipality is unable to do so.

⁵ Following Judge Jacobson's 2018 decision In the Matter of the Application of the Municipality of Princeton, L-1550-15 (directly involving West Windsor and Princeton, but having statewide implications), the third round "numbers" were recalculated by Econsult Solutions Inc. using the formula established by that decision. Haddon Heights' combined gap present need and third round prospective need under the Jacobson methodology is 107 (a 65-unit reduction from 172). The Borough's "unmet need" would thereby be reduced from 179 to 114.

Haddon Heights again requests a vacant land adjustment of the prospective need obligation. It is well established that Haddon Heights is a “built out” municipality. The RDP established for the Third Round (16 units) has been satisfied as set forth in section IV.C below.

Haddon Heights’ Fourth Round prospective need obligation is 43 units. The Fourth Round municipal obligations were calculated by the DCA using the methodology set forth in the Fair Housing Act and as explained in DCA’s report entitled “Affordable Housing Obligations for 2025-2035 (Fourth Round) Methodology and Background”. Prior to adopting Resolution 2025:62 (accepting the Fourth Round fair share obligation), the Borough’s affordable housing planner and affordable housing sub-committee reviewed DCA’s land capacity analysis and identified parcels that should not have been included as vacant and available. For Haddon Heights there were only 7 polygons, totaling 4.485 vacant developable acres shown on DCA’s land capacity factor map to start with. The Borough’s evaluation of each parcel reduced the vacant and developable land to 0 acres. All of the land identified by DCA in its analysis is open space or utility infrastructure owned by the Borough or the NJDOT (adjacent to Route 295 right-of-way). In accordance with DCA’s analysis Haddon Heights had .02% of the region’s vacant land. Per the Borough’s analysis Haddon Heights has 0% of the region’s vacant land. The list of lots that were included as vacant and potentially developable in DCA’s analysis are included as Appendix C.

The vacant land resource constraints in Haddon Heights that were affirmed in the prior affordable housing rounds remain. There is no undeveloped or traditionally vacant land available in the Borough. All future development in the Borough will be redevelopment. Haddon Heights is committed to enabling contextually appropriate redevelopment to meet all of its interconnected land use planning goals, including the provision of opportunities for affordable housing. As part of its ongoing planning efforts, the Borough has identified areas likely to redevelop over the course of the fourth round and will provide zoning and/or redevelopment plans to enable the development of at least 25% of the calculated prospective need (11 affordable housing units). The remaining “unmet need” will continue to be accommodated if and when additional redevelopment opportunities are identified.

C. Look Back to Prior Rounds

N.J.S.A. 52:27D-304.1(3)(f)(2)(a) provides that as part of its housing element and fair share plan, the municipality shall include an assessment of the degree to which the municipality has met its fair share obligation from the prior rounds of affordable housing obligations as established by prior court approval, and determine to what extent this obligation is unfulfilled or whether the municipality has credits in excess of its prior round obligations. If a prior round obligation remains unfulfilled, or a municipality never received approval from court or the council for any prior round, the municipality shall address such unfulfilled prior round obligation in its housing element and fair share plan.

In addressing prior round obligations, the municipality shall demonstrate how any sites that were not built in the prior rounds continue to present a realistic opportunity, which may include

proposing changes to the zoning on the site to make its development more likely, and which may also include the dedication of municipal affordable housing trust fund dollars or other monetary or in-kind resources. The municipality shall only plan to replace any sites planned for development as provided by a prior court approval, settlement agreement, or approval by the council, with alternative development plans, if it is determined that the previously planned sites no longer present a realistic opportunity, and the sites in the alternative development plan provide at least an equivalent number of affordable units and are otherwise in compliance with the "Fair Housing Act," P.L.1985, c.222 (C.52:27D-301 et al.) and the Mount Laurel doctrine.

1. Realistic Development Potential (RDP) Obligation

As described above, based on the vacant land adjustment that was granted in the Prior Round and in the Third Round, the Borough's RDP was set at 16 affordable units. The proposed means to satisfy the RDP was set forth in the October 20, 2016 Settlement Agreement and the Third Round Housing Element and Fair Share Plan adopted on February 16, 2017.⁶ The Third Round Settlement Agreement is included as Appendix D. The compliance mechanisms exceed the 25% cap on age-restricted units. This deviation appears to have been accepted at the time the settlement was reached and therefore is being retained. However, shifting of credits once the proposed unmet need units are constructed will bring the RDP into compliance with the age-restricted cap. Additionally, the Borough has not claimed any rental bonuses from the supportive and special needs units, which would have the effect of reducing the total number of affordable units (and resulting in a compliant number of age restricted units).

COAH's Second Round rules, contained at N.J.A.C. 5:93, provide the parameters that permit affordable housing credits and bonuses to be applied toward affordable housing obligations for the Prior Round. Bonus credits have not been factored into compliance with the RDP.

A summary of Haddon Heights' RDP compliance plan is provided on the table below.

⁶ The Housing Element and Fair Share Plan adopted on February 16, 2017 is not entirely consistent with the Fair Share Settlement Agreement and includes a variety of calculations that obscure the overall compliance picture. This plan aims to clarify compliance and ensure specificity.

Haddon Heights Borough Realistic Development Potential: 16						
Block	Lot	Compliance Mechanism	Type	Status	Units	Bonuses
87	2.06	Bancroft Group Home 1214 S Park Ave	Rental SSN	Complete	4	-
25	8	Youth Services Inc (18 to 21y/o) 101 E Atlantic Ave	Rental SSN	Complete	5	-
37 34	3 & 7 18	Stanfill Commons 404, 411, 412 White Horse Pike	Age Restrict Rental	Complete ⁷	5	-
37	9 & 10	Kings Run Units 207, 311 ⁸ 401 East Atlantic Ave	Age Restrict For Sale	Complete	2	-
Total					16	0

The minimum number of affordable rental units and maximum number of age-restricted affordable units are established based on the following formulas set forth in COAH's Second Round rules at N.J.A.C. 5:93.

1. Minimum number of rental units (25% of obligation): 4
2. Maximum number of age restricted units (25% of obligation minus RCAs): 4
3. Bonus credits (max 25% of obligation): 4

2. Third Round Unmet Need Obligation

After subtracting the RDP of 16 from Haddon Heights' cumulative Prior Round and Third Round obligation of 130, the remaining unmet need is 114 units. The Third Round Settlement Agreement (Appendix D) provided that opportunities for 29 affordable units would be provided. In the years following the Settlement Agreement it became apparent that two of the proposed "unmet need" sites would not be capable of producing the number of units that had been suggested in the Housing Element and Fair Share Plan. The Borough has coordinated with Fair Share Housing Center about the need to replace two of the original unmet need redevelopment proposals with more viable redevelopment initiatives.

The first table includes the "original" proposal to provide 29 units of unmet need for the Third Round. The second table is the revised proposal to provide 29 units of unmet need for the Third Round.

⁷ The Stanfill Commons units were brought into service in 2008. The project includes 13 units, 5 are applied to the RDP and 8 are applied to the unmet need. The PILOT agreement requiring deed restricted affordable units is included as Appendix E. The Borough has been working to acquire the required deed restriction and will add the affordability restriction as Appendix F as soon as it is acquired.

⁸ The Kings Run Deed Restrictions are provided in Appendix G

Haddon Heights Borough ORIGINAL Third Round Unmet Need Proposals – 29 units						
Block	Lot	Compliance Mechanism	Type	Status	Units	Bonuses
37 34	3 & 7 18	Stanfill Commons 404, 411, 412 White Horse Pike	Age Restrict Rental	Complete ⁹	9 ¹⁰	-
29	4	222 W. Atlantic Ave CBD Redevelopment	Family Rental	N/A	6	-
80	1, 2, 2.01, 2.03	1400, 1420, 1440, 1500 Kings Highway Redevelopment	Family Rental	N/A	14	
Total					29	

Block 24 Lot 24 – 222 West Atlantic Avenue

The Third Round Housing Element and Fair Share Plan proposed that this 1.14 acre site would be developed at a density of 25 dwelling units per acre, yielding 28 total units with a 20% affordable housing set aside. The site has been in continuous commercial use and redevelopment of the site was determined to not likely over a ten year period. The Borough determined that there are other alternatives that are more likely to result in the production of affordable housing units.

Block 80 Lots 1, 2, 2.01, 2.03- Kings Highway

The Third Round Housing Element and Fair Share Plan proposed that this aggregated 2.75 acre site would be developed at a density of 25 dwelling units per acre, yielding 68 total units with a 20% affordable housing set aside. There were objections by landowners to the redevelopment area designation and between 2016 and 2021 there were a number of viable commercial uses operating at the site. The site is constrained by some wetland and flood hazard areas associated with the South Branch of Newton Creek, and it was determined that assemblage and redevelopment at the 25 dwelling unit per acre density was unlikely. The Borough determined that there are other alternatives that are more likely to result in the production of affordable housing units. More recently, interest in this site has reemerged. However, given the need to assemble properties, the recent interest among landowners, the existing improvements on the site, and the environmental constraints impacting the rear of the property, the site will be addressed as part of the Fourth Round compliance plan, but with a reduced density expectation.

Since the Borough committed to provide opportunities for 29 “unmet need” units in the Third Round, the Borough has continued to strive for that number. The table below provides the revised Third Round unmet need proposals.

⁹ The Stanfill Commons units were brought into service in 2008. The project includes 13 units, 5 are applied to the RDP and 8 are applied to the unmet need. The PILOT agreement requiring deed restricted affordable units is included as Appendix ___. The Borough has been working to acquire the required deed restriction and will add the affordability restriction as Appendix ___ as soon as it is acquired.

¹⁰ The 2016 Settlement Agreement and HEFS Plan indicate 5 units from Stanfill Commons for the RDP and 9 units for the unmet need. However there are only 13 affordable units at the site, so the unmet need portion should be 8.

Haddon Heights Borough NEW Third Round Unmet Need Proposals – 29 units						
Block	Lot	Compliance Mechanism	Type	Status	Units	Bonuses
37 34	3 & 7 18	Stanfill Commons 404, 411, 412 White Horse Pike	Age Restrict Rental	Complete ¹¹	8	-
37	9 & 10	Kings Run Units 411, 413 ¹² 401 East Atlantic Ave	Age Restrict For Sale	Complete	2	-
25	16 & 17.01	Broken Ground 501 Station Avenue	Family Rental	Approved	2	-
24	4 & 5	St Mary's Episcopal Church 14-18 White Horse Pike	Age Restrict Rental	Approved	6	-
36	10 & 11	The Jefferson 322-324 White Horse Pike	Family Rental	Approved	1	-
128 134	multi multi	Black Horse Pike Redevelopment Area ¹³	Family Rental	Concept	10	-
Total					29	

Crediting Parameters

The Third Round is subject to the following crediting parameters. The calculations below are based on the 29 unmet need credits outlined above.

1. Maximum Rental Bonuses (25% of obligation) = 7
2. Minimum Third Round Total Family Units (50% of obligation- bonuses)= 15
3. Maximum Third Round Age-Restricted Units (25% of obligation) = 7
4. Minimum Third Round Rental Units (25% of obligation) = 7
5. Minimum Third Round Family Rental Units (50% of required rental)= 4
6. Minimum Third Round Very Low-Income Units (13% of units approved/created after 7/17/2008) = 3
7. Minimum Third Round Very Low-Income Family Units (50% of required very low income units) = 2

Map 2 shows the location of the affordable housing sites.

¹¹ The Stanfill Commons units were brought into service in 2008. The project includes 13 units, 5 are applied to the RDP and 8 are applied to the unmet need. The PILOT agreement requiring deed restricted affordable units is included as Appendix __. The Borough has been working to acquire the required deed restriction and will add the affordability restriction as Appendix __ as soon as it is acquired.

¹² The Kings Run Deed Restrictions are Provided in Appendix __.

¹³ It is anticipated that the Black Horse Pike Redevelopment Area will yield 12 to 16 affordable units. Additional units above 10, will accrue to the Fourth Round unmet need obligation.

Broken Ground (Station Ave Lofts)**Inclusionary Redevelopment****Block 25 Lots 4 & 5****501 Station Avenue****2 Family Rental Units**

In 2022 Borough Council authorized the Planning Board to conduct a preliminary redevelopment investigation to determine whether properties in two distinct areas of the Borough qualified as non-condemnation areas in need of redevelopment or as areas in need of rehabilitation in accordance with the criteria defined in New Jersey's Local Redevelopment and Housing Law (N.J.S.A. 40A:12A-1 et seq.).¹ "Study Area 2" included properties along the White Horse Pike from and Station Avenue. This site was designated as an Area in Need of Redevelopment by Resolution 2022:74 on April 5, 2022. It was determined that because of the varied conditions within the designated redevelopment and rehabilitation area and because of the need for site specific design requirements, redevelopment plans will be prepared for discrete or parts of blocks to respond to emerging opportunities.

A redevelopment plan for Block 25 Lots 7, 16, 17, 17.01 and 18 was prepared and adopted by Ordinance 2023:1537 on November 8, 2023. The redeveloper only acquired lots 4 and 5 and proposed a three-story building including first floor retail and service space and 12 residential units on the second and third floors. Two of the units will be affordable to low and moderate income households. The Redevelopment Plan is attached as Appendix H. The Borough and the Redeveloper entered into a Redevelopment Agreement. The applicant received site plan approval in 2024 in accordance with Resolution 24-5-2P attached as Appendix I.

St Mary's Episcopal Church**Inclusionary Redevelopment****Block 24 Lots 4 & 5****14-18 White Horse Pike****6 Age Restricted Rental Units**

In 2019 Borough Council authorized the Planning Board to conduct a preliminary redevelopment investigation to determine whether lots 4 and 5 in Block 24 qualified as a non-condemnation area in need of redevelopment in accordance with the criteria defined in New Jersey's Local Redevelopment and Housing Law (N.J.S.A. 40A:12A-1 et seq.). The property was designated as an area in need of redevelopment by resolution 2020:184. A redevelopment plan to govern and guide redevelopment of the site was adopted by Ordinance 2024:1538 on February 6, 2024. The redevelopment plan was amended by ordinance 2025:1566 on March 4, 2025.

The redeveloper proposes to retain the original church worship space along the White Horse Pike frontage, to demolish underused structures, and to construct a three-story age restricted multi-family building. Six of the units will be affordable to low and moderate income households. The Redevelopment Plan is attached as Appendix J. The Borough and the Redeveloper entered into a

Redevelopment Agreement. The applicant received site plan approval in accordance with Resolution ___ attached as Appendix K.

The Jefferson/Ivy Property Group

Inclusionary Redevelopment

Block 36 Lots 10 & 11

322-324 White Horse Pike

1 Family Rental Unit

In 2022 Borough Council authorized the Planning Board to conduct a preliminary redevelopment investigation to determine whether properties in two distinct areas of the Borough qualified as non-condemnation areas in need of redevelopment or as areas in need of rehabilitation in accordance with the criteria defined in New Jersey's Local Redevelopment and Housing Law (N.J.S.A. 40A:12A-1 et seq.).¹ "Study Area 2" included properties along the White Horse Pike and along Station Avenue, and included lots 10 and 11 in block 36, known as the Jefferson Bank site. The commercial property had been vacant for several years.

A redevelopment plan for Block 36 Lots 10 and 11 was prepared and adopted by Ordinance 2024:1555 on October 1, 2024. An application for adaptive reuse of the buildings was approved. The applicant will convert the building to accommodate five residential units. One unit will be a deed restricted affordable unit (2 bedroom low income unit)¹⁴. The Redevelopment Plan is attached as Appendix L. The Borough and the Redeveloper entered into a Redevelopment Agreement. The applicant received site plan approval in accordance with Resolution 24-10-2P attached as Appendix M.

Black Horse Pike Redevelopment Area

Inclusionary Redevelopment Overlay

Block 128 Lots 1, 1.01, 1.02, 4, 5, 6 and 3.01 & 11

Block 134 Lots 1, 2, 3, 4, 5

Block 140 Lot 1

Black Horse Pike

12 Family Rental Units (10 for Third Round Unmet Need and 2+ for Fourth Round unmet need)

The Black Horse Pike redevelopment area was designated on April 5, 2022 by Resolution 2022:74, included as Appendix N. The designated redevelopment area includes the entire Black Horse Pike frontage in Haddon Heights (see Appendix O), which includes portions of 9 blocks. Following the designation a review of each block was conducted to evaluate the existing uses and ownership and the potential for change. Two blocks (blocks 128 and 134) have the greatest potential for aggregation of lots for redevelopment. Two other areas have been identified for potential conversion to residential use or for supportive and special needs housing. A Redevelopment Plan will be prepared to permit mixed use redevelopment of Block 128 Lots 1, 1.01, 1.02, 4, 5, and 6

¹⁴ The plan initially proposed a 2 bedroom moderate income unit, but a request to provide a two bedroom low income unit was subsequently approved by the planning board.

and Block 134 lots 1, 2, 3, 4, and 5 with first floor commercial space and parking, and second and third floor residential space. It is anticipated that these sites could yield total 60 residential units, including 12 affordable units. The Redevelopment Plan will also permit conversion to inclusionary or 100% affordable residential on Block 128 Lots 3.01 and 11 and Block 140 Lot 1. For these sites the Borough would support conversion for inclusionary residential or would support funding applications for conversion to 100% affordable or supportive and special needs housing (group home). A redevelopment plan will be prepared and adopted and added as an Appendix to this plan.

D. Fourth Round Prospective Need

The amended Fair Housing Act defines prospective need as a “projection of housing needs based on development and growth which is reasonably likely to occur in a region or municipality, as the case may be, as a result of actual determination of public and private entities.” The methodology for calculating the prospective need is set forth at N.J.S.A. 52:27D-304.3(c). The prospective need is calculated based on three factors: the nonresidential valuation factor, the income capacity factor, and the land capacity factor. The three factors are averaged to yield the municipality’s average allocation factor for distributing the regional prospective need to the municipality. NJDCA calculated Haddon Heights’ Fourth Round number to be 43.

For the Fourth Round, the Fair Housing Act provides that any municipality that receives an adjustment of its prospective need obligations based on a lack of vacant land shall, as part of the process of adopting and implementing its housing element and fair share plan, identify sufficient parcels likely to redevelop during the current round of obligations to address at least 25 percent of the prospective need obligation that has been adjusted, and adopt realistic zoning that allows for such adjusted obligation, or demonstrate why the municipality is unable to do so. The table below outlines the Borough’s proposal to adopt zoning (via Redevelopment Plans) to enable the production of 11 affordable housing units (25% of the Fourth Round obligation of 43). The locations of the affordable housing sites are included on Map 2.

Haddon Heights Borough Fourth Round Prospective Need: 43. 25% Required Unmet Need Zoning: 11						
Block	Lot	Compliance Mechanism	Type	Status	Units	Bonuses
54	1	Serenity House 802 Station Avenue	Transitional	Approved	4	-
36	10, 11 & p/o 23	The Jefferson Phase II 322-324 White Horse Pike	Family Rental	Concept	4	-
128 134	multi multi	Black Horse Pike Redevelopment Area ¹⁵	Family Rental	Concept	2 to 6	TBD
80	1, 2, 2.01, 2.03	Kings Highway (Window Factory) Redevelopment Area	Family Rental	Concept	7	TBD
Total					17 to 21	TBD

1. Requirements and Bonus Credits

N.J.S.A. 52:27D311(l) provides minimum and maximum requirements for family, rental, and age restricted units. The Fair Housing Act provides that no more than 30 percent of the prospective need obligation (exclusive of bonus credits) may be satisfied with age restricted affordable housing. It further provides that at least 50 percent of the actual units produced must be available to families with children, and that at least 25 percent of the actual units produced must be rental units, with at least half of those available to families.

N.J.S.A. 52:27D-311(k) provides that a municipality is permitted to satisfy up to 25% of its prospective need obligation through the use of bonus credits. For Haddon Heights' Fourth Round obligation (43 units) this is 11 Bonus Credits. The following types of bonus credits may be available as part of Haddon Heights' Fourth Round fair share plan.

- N.J.S.A. 311(k)(1) provides that for low- and moderate- income housing for individuals with special needs or permanent supportive housing, municipalities may claim 1 bonus credit per unit.
- N.J.S.A. 311(k)(5) provides that for each unit of low- or moderate-income family housing with at least three bedrooms above the minimum number required by the bedroom distribution (pursuant to the Uniform Housing Affordability Controls) the municipality may claim .5 bonus credit per unit.

¹⁵ It is anticipated that the Black Horse Pike Redevelopment Area will yield 12 to 16 affordable units. Additional units above 10, will accrue to the Fourth Round unmet need obligation.

- N.J.S.A. 311(k)(6) provides that for each unit of low- or moderate-income housing constructed on land that is or was previously developed and utilized for retail, office, or commercial space the municipality may claim .5 bonus credit per unit.

2. IHOC (Interfaith Homeless Outreach Council)

Serenti House at 802 Station Avenue Block 26 Lot 12

IHOC purchased 802 Station Avenue in 2024. Prior to IHOC's acquisition, the property had been operated as a boarding (rooming) house for several decades. IHOC is renovating the property to create a supportive housing environment for up to nine (9) men working toward obtaining permanent housing.

The Fair Housing Act defines "transitional housing" as temporary housing that includes, but is not limited to, single-room occupancy housing or shared living and supportive living arrangements; provides access to on-site or off-site supportive services for very low-income households who have recently been homeless or lack stable housing; is licensed by the department; and allows households to remain for a minimum of six months. The Fair Housing Act further provides at N.J.S.A. 52:27D-311(e) that transitional housing may be included as a compliance mechanism in a municipal fair share plan when adequate measures to retain affordability are in place, and that the Borough shall not credit transitional housing units toward more than ten percent of the fair share obligation.

The Borough is working with the owner and operator of Serenity House to ensure adequate affordability controls are in place. When executed, the affordability restriction will be added to the Appendix of this plan. The Fourth Round prospective need is 43 units, allowing up to 4 transitional units for credit. However, the unmet need requirement is 11 units, allowing 1 transitional unit for credit. Four units are included in the table above, but three of them are above the minimum 11 units of unmet need.

3. The Jefferson – Phase II (Ivy Property Group)

Inclusionary Redevelopment Block 36 Lots 10, 11, p/o 23 4 Family Affordable Rental

The initial conversion of the former Jefferson Bank site for 5 residential units, including one affordable unit is described as a Third Round unmet need compliance site above. Phase II of the project will be an expansion of the development with new construction southwest of the existing building. The 2022 redevelopment area designation (Resolution 2022:74) also included lot 23, a Borough owned lot adjacent to lots 10 and 11. Lot 23 was previously used for active recreation but is now underutilized (it is not on the Borough's ROSI). The proposal is to enable lot 23 to be subdivided into two lots: one to be retained by the Borough for

recreation and one to be sold for redevelopment and consolidated or coordinated with lots 10 and 11.

The redevelopment plan for Block 36 Lots 10 and 11 (adopted by Ordinance 2024:1555) anticipates a future plan amendment to accommodate a second phase of development on the southwest side of the property and on part of lot 23 to provide an opportunity for additional residential units in a complementary new building. The redevelopment plan will be amended to enable the anticipated expansion and will permit up to twenty (20) total units with a 20% affordable housing set aside. When the amendment is prepared and adopted it will be added as and Appendix to this plan.

4. Black Horse Pike Redevelopment

Inclusionary Redevelopment

Block 128 Lots 1, 1.01, 1.02, 4, 5, 6 and 3.01 & 11

Block 134 Lots 1, 2, 3, 4, 5

Block 140 Lot 1

12 Family Affordable Rental (10 for Third Round unmet need and 2+ for Fourth Round)

The Black Horse Pike redevelopment area was designated on April 5, 2022 by Resolution 2022:74, included as Appendix N. The designated redevelopment area includes the entire Black Horse Pike frontage in Haddon Heights (see Appendix O), which includes portions of 9 blocks. Following the designation a review of each block was conducted to evaluate the existing uses and ownership and the potential for change. Two blocks (blocks 128 and 134) have the greatest potential for aggregation of lots for redevelopment. Two other areas have been identified for potential conversion to residential use or for supportive and special needs housing. A Redevelopment Plan will be prepared to permit mixed use redevelopment of Block 128 Lots 1, 1.01, 1.02, 4, 5, and 6 and Block 134 lots 1, 2, 3, 4, and 5 with first floor commercial space and parking, and second and third floor residential space. It is anticipated that these sites could yield total 60 residential units, including 12 affordable units. The Redevelopment Plan will also permit conversion to inclusionary or 100% affordable residential on Block 128 Lots 3.01 and 11 and Block 140 Lot 1. For these sites the Borough would support conversion for inclusionary residential or would support funding applications for conversion to 100% affordable or supportive and special needs housing (group home). A redevelopment plan will be prepared and adopted and added as an Appendix to this plan.

5. Kings Highway Redevelopment (Window Factory Area)

Inclusionary Redevelopment

Block 80 Lots 1, 2, 2.01, 2.03

7 Family Affordable Rental

This area was included as an unmet need site in the 2016 Third Round Fair Share Settlement Agreement, but was beset with challenges as described in section IV.C(2) above. As a result,

the Borough has pursued other opportunities for Third Round unmet need compliance. For several years a local brewery was located at the site but has since left the property. There are some uses remaining at the site, but it has reemerged as a potential redevelopment opportunity. Borough Council authorized a new redevelopment investigation of the site and the site was subsequently designated as an Area in Need of Redevelopment by Resolution 2025:91 in March of 2025. The Resolution is included as Appendix P. Whereas the “original” Third Round unmet need proposal was for the overall tract to be developed at a density of 25 dwelling units per acre, the Fourth Round approach is more precise and realistic given the site constraints and existing conditions. A redevelopment plan will be prepared for the tract to enable mixed use redevelopment of the site, with an expectation that approximately 35 residential units will be constructed on the site, with a 20% affordable housing set aside that will yield 7 family rental units. Once adopted the redevelopment plan will be added as an Appendix to this plan.

E. Site Suitability

In accordance with N.J.A.C. 5:93-5.3 sites designated for inclusionary development or municipally sponsored affordable housing must be available, suitable, developable and approvable, as defined in N.J.A.C. 5:93-1.3. From a sound land use planning perspective, the site suitability factors must be considered as parts of a whole rather than in isolation. Each factor is affected by and/or interconnected with other suitability factors.

All of the properties proposed for inclusionary residential development in Haddon Heights are within designated redevelopment or rehabilitation areas, are within Planning Area 1 on the State Plan Policy Map, are within the designated sewer service area and have access to sewer and water infrastructure, and are located proximate to the regional road and public transportation systems.

Available Site

An available site means a site with clear title, free of encumbrances which preclude development for low- and moderate-income housing. It is the Borough’s understanding that all of the sites have clear title. If it is determined any of the sites proposed for inclusionary redevelopment overlays have title problems that prevent their redevelopment, alternative sites will be identified.

Suitable Site

A suitable site means a site that is adjacent to compatible land uses, has access to appropriate streets and is consistent with the environmental policies delineated in N.J.A.C. 5:93-4.

All of the sites are suitable as shown on Maps 1 and 2.

Developable Site

A developable site means a site that has access to appropriate water and sewer infrastructure, and is consistent with the applicable areawide water quality management plan (including the

wastewater management plan) or is included in an amendment to the areawide water quality management plan submitted to and under review by DEP.

All of the sites are developable.

Approvable Site

An approvable site means a site that may be developed for low- and moderate-income housing in a manner consistent with the rules or regulations of all agencies with jurisdiction over the site. A site may be approvable although not currently zoned for low- and moderate-income housing.

All of the sites are approvable. Redevelopment Plans either have been or will be adopted to enable the proposed inclusionary housing.

F. Affordable Housing Trust Fund

The Fair Housing Act (N.J.S.A. 52:27D-329.2) provides that a municipality in the process of seeking compliance certification or that has obtained compliance certification, and which has adopted a municipal development fee ordinance shall be authorized to impose and collect development fees from developers of residential properties in accordance with rules promulgated by the department (DCA). Municipalities are also permitted to collect nonresidential development fees, but may not spend or commit to spend affordable housing development fees without first obtaining approval of proposed expenditures as part of the compliance certification.

Haddon Heights adopted its updated Affordable Housing Development Fee requirements by Ordinance 2023:1533 on September 19, 2023. The Affordable Housing Development Fee requirements (Borough Code section 450-164.1) will be updated and adopted to reflect the dissolution of COAH and the current Court led process. A new Spending Plan will also be prepared and will be added as an Appendix to this plan upon completion and adoption.

Haddon Heights' Affordable Housing Trust Fund is in a separate interest-bearing account at Fulton Bank. As required by N.J.S.A. 52:27D-329.2, Haddon Heights will enter updated information into DCA's AHMS including a detailed accounting of development fees that have been collected and expended since the inception of the municipal authorization to collect fees. Updated detailed accounting is required by February 15th of each year in the compliance cycle.

As of December 31, 2024 there was \$187,106.71 in Haddon Heights' Affordable Housing Trust Fund. One payment of \$225,000 was collected from the Kings Run development in 2016. Otherwise development fee revenues have been minimal, as the Borough is built out and there is little new construction. More recent approvals have been inclusionary and therefore will not pay development fees. Development fees are only permitted to be expended in accordance with an approved spending plan.

The amended Fair Housing Act required that the DCA promulgate updated regulations related to the establishment, administration, reporting, and enforcement of the expenditure of affordable housing development fees by municipalities, which shall include establishing an expedited process for approving spending plan expenditures for emergent opportunities to create affordable housing after a municipality has obtained compliance certification and procedures for monitoring the collection and expenditure of trust funds.

Once the exterior structural conditions survey is completed to evaluate the need for a municipal rehabilitation program, an updated spending plan will be prepared. It is anticipated that AHTF money will be used to provide affordability assistance to support the provision of very low income units within the proposed inclusionary redevelopment areas.

G. Cost Generation

Haddon Heights has worked with redevelopers to ensure the viability of the affordable units within redevelopment projects. The Borough proposes, as part of the implementation of this plan to allow deviations from the U.H.A.C. rules on a site by site basis and instead to have the requirements apply to the Borough's overall compliance plan. Because many of the inclusionary projects are small and will only produce one, two, or a few affordable units, the Borough needs flexibility in implementing the bedroom and affordability breakdown requirements in order to ensure project viability and overall fair share plan viability. The Borough has and will continue to ensure the removal of unnecessary cost-generating requirements. Once DCA and HMFA finalize their proposed rules, the Borough will consider revisions to the Land Development Code that may be necessary to address new requirements related to cost generation.

H. Administration

Affordable housing units are required to be administered by a certified administrative agent that will oversee all aspects of the affordable units to ensure adherence to DCA's and HMFA's requirements and the applicable UHAC requirements (affirmative marketing, income distribution, minimum 13% very low-income, ensuring the filing of 45-year affordability controls, income qualification of tenants, and overseeing the long-term management of the development).

Haddon Heights Borough's administrative agent is Community Grants, Planning & Housing. CGP&H is working with the Borough to administer existing affordable units, update deed restrictions and other compliance documents as needed and will administer new units that are created in the Borough. The administrative agent will also work with the Borough's affordable housing planner and Municipal Housing Liaison to ensure proper documentation and monitoring of the affordable housing inventory.

I. Monitoring

In accordance with the requirements of N.J.S.A. 52:27D-329.2 and -329.4, by February 15 of each year of the Fourth Round, the Borough will provide a detailed accounting through DCA's new online portal of all residential and non-residential fees collected, interest earned, and other income collected and deposited into the Borough's affordable housing trust fund during the prior calendar year. The Borough will also provide a detailed accounting of all expenditures of affordable housing trust funds during the prior calendar year, including purposes and amounts, and documentation of the balance remaining in the affordable housing trust fund as of December 31 of that year.

The status of implementation of the Fair Share Plan may be evaluated by the Borough or an interested party at the midpoint of the certification period by filing a request with the Program for a realistic opportunity review. If such an action is initiated, The Borough may propose one or more alternative sites with an accompanying development plan or plans that provide a realistic opportunity for the same number of affordable units and are otherwise in compliance with the FHA and the *Mount Laurel* doctrine.