

# Housing Element and Fair Share Plan

Fourth Round Plan

Township of Haddon  
Camden County, New Jersey

May 19, 2025  
Adopted June 4, 2025

Clarke Caton Hintz



**TOWNSHIP OF HADDON PLANNING AND ZONING BOARD****RESOLUTION # 2025-PB-02****RESOLUTION OF THE TOWNSHIP OF HADDON PLANNING AND ZONING BOARD,  
CAMDEN COUNTY, NEW JERSEY, ADOPTING THE HOUSING ELEMENT AND  
FAIR SHARE PLAN FOR THE TOWNSHIP'S MASTER PLAN FOR THE FOURTH  
ROUND AFFORDABLE HOUSING OBLIGATION**

**WHEREAS**, in accordance with the New Jersey Fair Housing Act ("FHA"), N.J.S.A. 52:27D-310, as amended by P.L. 2024 c.2, the Administrative Directive #14-24, and the rules of the New Jersey Council on Affordable Housing ("COAH") contained at N.J.A.C. 5:93 et seq., the Fourth Round Housing Element and Fair Share Plan ("HEFSP" or the "Plan") has been prepared for the Township of Haddon ("Township"), by the Township's Affordable Housing Professional Planning consultants, Mary Beth Lonergan, PP, AICP and Tristan Harrison, PP, AICP of Clarke, Caton, Hintz, PC; and

**WHEREAS**, the Plan was prepared in order to update the Township's 2020 Third Round obligation from a Settlement Agreement with the Fair Share Housing Center ("FSHC"), dated July 30, 2020, executed August 20, 2020, and approved by Court Order on October 28, 2020; and

**WHEREAS**, the FSHC preliminarily approved the amended Third Round Agreement on May 1, 2025 and the Township approved and fully executed the amended Third Round Agreement with FSHC on May 27, 2025; and

**WHEREAS**, this cumulative Fourth Round HEFSP will serve as the foundation for the Township's submission to the Superior Court of New Jersey and the Affordable Housing Dispute Resolution Program ("Program"); and

**WHEREAS**, the Township has satisfied its obligations for the Prior Round and Third Round through the completion and proposal of a mix of various types of affordable housing units (Court-approved), including affordable senior rentals, affordable family rentals and Prior Round and Third Round rental bonuses; and

**WHEREAS**, January 28, 2025, the Township of Haddon Commissioners adopted Resolution #2025-17, accepting the determination of the Township's Fourth Round Present Need/Rehabilitation Obligation and Prospective Need established by the State of New Jersey, Department of Community Affairs ("DCA"); and

**WHEREAS**, on March 28, 2025, the Township received a Court order affirming the Township's Fourth Round obligations in the Declaratory Judgment Action filed;

**WHEREAS**, notice was duly provided by the Planning and Zoning Board (the "Board") consistent with the requirements of N.J.S.A. 40:55D-13 that the Board would conduct a public hearing on the HEFSP on June 4, 2025 to determine whether the Housing Element and Fair Share Plan was consistent with the goals and objective of the Township's Master Plan, and whether

adoption and implementation of the HEFSP as an element of the Township's Master Plan is in the public interest, protects public health and safety, and promotes the general welfare; and

**WHEREAS**, consistent with the requirements of N.J.S.A. 40:55D-13, a copy of the HEFS Plan was made available for public inspection during usual business hours at the Municipal Clerk's office at least ten (10) days in advance of the hearing.

**NOW THEREFORE, BE IT RESOLVED** by the Township of Haddon Planning and Zoning Board, Camden County in the State of New Jersey as follows:

1. Upon notice duly provided in a manner consistent with the requirements of N.J.S.A. 40:55D-13, the Board conducted a public hearing on June 4, 2025 on the HEFSP dated May 19, 2025, which was prepared by the Township's Affordable Housing Professional Planning consultants, Mary Beth Lonergan, PP, AICP and Tristan Harrison, PP, AICP of Clarke, Caton, Hintz, PC.

2. At the June 4, 2025 hearing on the HEFSP, the Board heard and considered the testimony of its Affordable Housing Professional Planning consultant, Tristan Harrison, PP, AICP. At the hearing, the Board also invited public comment on the HEFSP for its consideration.

3. At the June 4, 2025 hearing, the Board determined that the HEFSP was consistent with the goals and objective of the Township's Master Plan, and that adoption and implementation of the Housing Element and Fair Share Plan as an element of the Township's Master Plan was in the public interest, protects public health and safety, and promotes the general welfare.

4. Based upon the foregoing, the Planning Board hereby adopts the Fourth Round Housing Element and Fair Share Plan dated May 19, 2025 prepared by its Affordable Housing Professional Planning consultants, Mary Beth Lonergan, PP, AICP and Tristan Harrison, PP, AICP of Clarke, Caton, Hintz, PC.

5. Based upon the foregoing findings, the Board hereby recommends that the adopted HEFSP be formally endorsed by the Township Commissioners in furtherance of its constitutional obligations with respect to affordable housing.

6. The Board authorizes the Chairman of the Board to sign the memorializing Resolution adopted at the time of the June 4, 2025 meeting and authorizes the Board Secretary to submit this signed Resolution to the Municipal Clerk for submission to the Township Commissioners and Township Attorney for submission to the Superior Court and Program within 48 hours of HEFSP adoption by the Board.

**ROLL CALL ON THE MOTION/FINDINGS: June 4, 2025:**

Motion by:  
All in favor:  
Voting against:  
Absent:  
Abstentions:

Seconded by:

**ROLL CALL ON MEMORIALIZATION: June 4, 2025:**

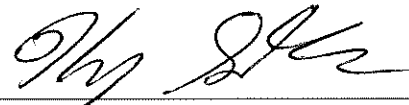
Motion by: Frank Ryan      Seconded by: John Foley  
All in favor: Rotz, Foley, Buono, Ryan, Wells, Calves, D'Alessandro  
Voting against: N/A  
Absent: Bergmann, Downham, Stevenson, Kirschner, Jandoli  
Abstentions: Commissioner Mulroy



Richard B. Rotz, Chairman

**CERTIFICATION**

I hereby certify that the foregoing is a true, accurate, and complete copy of the resolution of memorialization adopted by the Planning Board at its public meeting on June 4, 2025, memorializing action taken by the Planning Board on June 4, 2025.



Kimberly Schemley, Board Secretary

## Housing Element and Fair Share Plan Fourth Round

Planning Board  
Township of Haddon  
Camden County, New Jersey

May 19, 2025  
Adopted June 4, 2025

*Prepared by:*



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Mary Beth Lonergan, PP, AICP  
New Jersey Professional Planner License 4288



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Tristan Harrison, PP, AICP  
New Jersey Professional Planner License No. 6528

**CLARKE CATON HINTZ, PC**  
100 Barrack Street  
Trenton, New Jersey 08608  
(609) 883-8383

A signed and sealed original is on file with the Township Clerk.

## **Mayor and Board of Commissioners**

Randall W. Teague, Mayor  
Ryan Linhart, Commissioner  
James Mulroy, Commissioner

Stuart Platt, Esq., Township Attorney  
Greg Fusco, PE, Township Engineer  
Dawn M. Pennock, Township Clerk

## **Township Planning and Zoning Board**

Richard Rotz, Chair, Class IV  
Greg Wells, Vice Chair, Class IV  
Frank Ryan, Mayor's Designee, Class I  
James Stevenson, Municipal Employee, Class II  
James Mulroy, Commissioner, Class III  
Marguerite Downham, Environmental Liaison, Class IV  
Joe Buono, Class IV  
Suzanne Discher, Class IV  
John Foley, Class IV  
Jose Calves, Alternate #1  
Meredith Kirschner, Alternate #2  
Chris Jandoli, Alternate #3  
Mary Rita D'Alessandro, Alternate #4  
  
M. Lou Garty, Esq., Board Solicitor  
Gregory Fusco, PE, Board Engineer  
Lee Palo, Zoning Officer  
Kimberly Schemeley, Board Secretary

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Fourth Round Housing Element and Fair Plan**

**Adopted June 4, 2025**

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## **EXECUTIVE SUMMARY**

This Fourth Round Housing Element and Fair Share Plan (“HEFSP”) has been prepared for the Township of Haddon (“Township”), Camden County, in accordance with the New Jersey Fair Housing Act (“FHA”) at N.J.S.A. 52:27D-310 as amended by P.L. 2024, c.2, Administrative Directive #14-24, and the rules of the New Jersey Council on Affordable Housing (“COAH”) contained at N.J.A.C. 5:93 *et seq.* This cumulative Fourth Round HEFSP will serve as the foundation for the Township’s submission to the Superior Court of New Jersey and the Affordable Housing Dispute Resolution Program (“Program”).

A municipality’s affordable housing obligation has four components: Fourth Round Present Need (Rehabilitation Share), Prior Round Prospective Need, Third Round Gap/Prospective Need, and Fourth Round Prospective Need.

As discussed throughout this plan, the Township entered into a Third Round Settlement Agreement with the Fair Share Housing Center (“FSHC”), dated July 30, 2020, executed August 20, 2020, and approved by Court Order on October 28, 2020. In addition, the Township is anticipated to approve an amendment to the 2020 FSHC Agreement at its May 27, 2025 meeting. FSHC preliminarily approved the amended Third Round Agreement on May 1, 2025. Both the 2020 Agreement and preliminary 2025 Amended Agreement establish the following Third Round affordable housing obligations for the Township:

- Prior Round Prospective Need, per COAH: 35
- Third Round Gap/Prospective Need: 198

The Township has fully addressed its Prior Round Prospective Need with existing affordable senior rentals at the Rohrer Towers II site, affordable family rentals at Albertson Village (Rose Hill) and Haddon Towne Center (Fieldstone), and Prior Round bonuses. As set forth in the preliminary 2025 Amended Agreement, the Township has addressed its Third Round Prospective Need with affordable senior rentals at Coles Landing, affordable family rentals at Haddon Towne Centre (Fieldstone), Old Thriftway/Crystal Lake, and Wells Fargo/600 Cuthbert, Third Round bonuses, as well as with other mechanisms specified in this Fourth Round HEFSP.

On January 28, 2025, the Haddon Township Board of Commissioners adopted Resolution #2025-17 accepting the determination of the Township’s Fourth Round Present Need/Rehabilitation Obligation and Prospective Need by the New Jersey Department of Community Affairs (“DCA”). On March 28, 2025, the Township received a Court order affirming the Township’s Fourth Round obligations in the DJ Filing as follows:

- Fourth Round Prospective Need: 69
- Fourth Round Present Need/Rehab Share: 35

The Township plans to address its Fourth Round Present Need/Rehab Share through continued participation in the Camden County rehabilitation program.

For its Fourth Round Prospective Need, the Township has proposed a vacant land adjustment which will adjust the Prospective Need of 69 to a realistic development potential (“RDP”) of 5 and an Unmet Need of 64. The Township plans to address the RDP through an existing affordable senior rental unit at Coles Landing, a three-unit proposed market-to-affordable program, and one (1) Fourth Round bonus. The Township proposes a multitude of mechanisms for future opportunities to address the Township’s Fourth Round Unmet Need as well as the balance of the Third Round fair share, including a proposed Mandatory Affordable Housing Setaside Ordinance for both formal and informal redevelopment activity.

## **BRIEF HISTORY AND REGIONAL LOCATION**

Haddon Township is located in central Camden County, southeast of the City of Camden and less than 10 miles from Center City Philadelphia. The Township consists of 2.82 square miles distributed within three non-contiguous areas. The largest area of the Township is bounded by Collingswood to the northwest, Cherry Hill to the northeast, Haddonfield to the southeast, and Oaklyn and Audubon to the southwest. The neighborhoods of West Collingswood and West Collingswood Heights are separated from the rest of the Township by Oaklyn, Audubon, and Audubon Park, and Collingswood, and border Camden to the northwest, Gloucester City to the west, and Mount Ephraim to the south.

Originally known as Newton Township, Haddon Township saw its first European settlers arrive in the area of Newton Creek in 1681. Historians believe that the Township may have split into two because of changes enacted by the New Jersey Legislature in the mid-1840s. The new statute changed the old practice of holding general elections on two days in different locations in a Township and forced many townships to break into smaller units. On February 23, 1865, the eastern section of Newton Township was split off and the Township of Haddon was created. The Township’s name comes from John Haddon, whose daughter, Elizabeth Haddon Estaugh, came from England in the 1700s and settled on her father’s large landholdings, which included what is now Haddon Township.

By 1875, Haddon Township comprised 81 farms, 33 manufacturing establishments, and more than 2,500 residents, including 1,400 within the village of Haddonfield, which was then under the jurisdiction of the Township of Haddon. Continued growth during the 19th century was due in large part to the development of the Camden & Atlantic Railroad in the 1850s, allowing easy access to Camden, and, by ferry, Philadelphia, and in the southward direction, as far as Absecon Inlet.

In 1828, James Stoy purchased 150 acres now known as the Crystal Lake Plantation. His son John is believed to have originated the petition seeking independence from Newton Township.

The Township of Haddon, over a period of many years, divided again, with portions becoming part of nine other municipalities: Oaklyn, Audubon, Audubon Park, Collingswood, Gloucester City, Woodlynne, Camden, Haddon Heights, and Haddonfield. These splits left Haddon Township with its current irregular, non-contiguous borders and two exclaves, West Collingswood Heights and West Collingswood Extension. The downtown portion of the township is known as Westmont, a name probably derived from a noted harness racing horse.<sup>1</sup>

The Township is served by the PATCO high-speed line, which runs between Philadelphia and the Lindenwold Transportation Center. Connections to NJ Transit's Atlantic City rail line are available in Lindenwold, and to NJ Transit's River Line in Camden. The Township is also served by NJ Transit bus route 450, which runs between Camden and the Cherry Hill Mall, and NJ Transit bus route 451, which runs between Camden and Voorhees Town Center.

The Township had a population of 15,407 in 2020, according to the Decennial Census. The American Community Survey estimates the Township's population was 15,398 in 2023, or less than 0.1% from the census.

## **NEW JERSEY AFFORDABLE HOUSING JUDICIAL AND LEGISLATIVE BACKGROUND**

In the 1975 Mount Laurel<sup>2</sup> decision, the New Jersey Supreme Court ruled that developing municipalities have a constitutional obligation to provide diversity and choice in the housing types permitted in the municipality, including housing for low- and moderate-income households. In its 1983 Mount Laurel II decision,<sup>3</sup> the New Jersey Supreme Court extended to all municipalities with any "growth area" as designated in the State Development Guide Plan (now superseded by the State Development and Redevelopment Plan, or SDRP) the obligation to provide their "fair share" of a calculated regional need for affordable units. Mount Laurel II also introduced a "builder's remedy" if a municipality was not providing its fair share of affordable housing. A builder's remedy may permit a developer that is successful in litigation the right to develop what is typically a higher density multi-family project on land not zoned to permit such use, so long as a "substantial" percentage of the proposed units would be reserved for low- and moderate-income households.

<sup>1</sup> History summarized from <https://www.haddontwp.com/government/history/> and [https://en.wikipedia.org/wiki/Haddon\\_Township,\\_New\\_Jersey](https://en.wikipedia.org/wiki/Haddon_Township,_New_Jersey).

<sup>2</sup> Southern Burlington County NAACP v. Township of Mount Laurel, 67 N.J. 151 (1975)

<sup>3</sup> Southern Burlington County NAACP v. Township of Mount Laurel, 92 N.J. 158 (1983)

In 1985, in response to Mount Laurel II, the New Jersey Legislature enacted the Fair Housing Act (“FHA”).<sup>4</sup> The FHA created the Council on Affordable Housing (“COAH”) as an administrative body responsible for oversight of municipalities’ affordable housing efforts, rather than having oversight go through the courts. The Legislature charged COAH with promulgating regulations (i) to establish housing regions; (ii) to estimate low- and moderate-income housing needs; (iii) to set criteria and guidelines for municipalities to use in determining and addressing their fair share obligations, and (iv) to create a process for the review and approval of municipal housing elements and fair share plans.

### **COAH’s First and Second Rounds (1987-1999)**

COAH created the criteria and regulations for municipalities to address their affordable housing obligations. COAH originally established a methodology for determining municipal affordable housing obligations for the six-year period between 1987 and 1993,<sup>5</sup> which period became known as the First Round. This methodology established an existing need to address substandard housing that was being occupied by low- and moderate-income households (variously known as “present need” or “rehabilitation share”), and calculated future demand, to be satisfied typically, but not exclusively, with new construction (“prospective need” or “fair share”).

The First Round methodology was superseded in 1994 by COAH’s Second Round regulations.<sup>6</sup> The 1994 regulations recalculated a portion of the 1987-1993 affordable housing obligations for each municipality and computed the additional municipal affordable housing need from 1993 to 1999 using 1990 census data. These regulations identified a municipality’s cumulative obligations for the First and Second Rounds. Under regulations adopted for the Third Round, a municipality’s obligation to provide affordable housing for the First and Second Rounds is referred to cumulatively as the Prior Round obligation.

### **COAH’s Third Round and Related Judicial and Legislative Activity, (1999-2025)**

The FHA had originally required housing rounds to be for a six-year period for the First and Second Rounds. In 2001, the time period increased to a 10-year period consistent with the Municipal Land Use Law (“MLUL”). In order to utilize 2000 census data, which hadn’t yet been released, COAH delayed the start of the Third Round from 1999 to 2004, with the Third Round time period initially ending in 2014. In December 2004, COAH’s first version of the Third Round rules<sup>7</sup> became effective, and the 15-

<sup>4</sup> N.J.S.A. 52:27D-301 *et seq.*

<sup>5</sup> N.J.A.C. 5:92-1 *et seq.*

<sup>6</sup> N.J.A.C. 5:93-1.1 *et seq.*

<sup>7</sup> N.J.A.C. 5:94-1 and 5:95-1

year Third Round *time period* (1999–2014) was condensed into an affordable housing *delivery period* from January 1, 2004, through January 1, 2014.

The 2004 Third Round rules marked a significant departure from the methods utilized in COAH’s Prior Round. Previously, COAH assigned an affordable housing obligation as an absolute number to each municipality. These Third Round rules implemented a “growth share” approach that linked the production of affordable housing to residential and non-residential development in a municipality.

On January 25, 2007, a New Jersey Appellate Court decision<sup>8</sup> invalidated key elements of the first version of the Third Round rules, including the growth share approach, and the Court ordered COAH to propose and adopt amendments to its rules. COAH issued revised rules effective on June 2, 2008 (as well as a further rule revision effective on October 20, 2008), which largely retained the growth share approach.

Just as various parties had challenged COAH’s initial Third Round regulations, parties challenged COAH’s 2008 revised Third Round rules. On October 8, 2010, the Appellate Division issued its decision on the challenges.<sup>9</sup> The Appellate Division upheld the COAH Prior Round regulations that assigned rehabilitation and Prior Round numbers to each municipality, but invalidated the regulations by which the agency assigned housing obligations in the Third Round, again ruling that COAH could not allocate obligations through a growth share formula. Instead, the Appellate Division directed COAH to use methods similar to those used in the First and Second Rounds.

### *Third Round Judicial Activity*

After various challenges were filed, on September 26, 2013, the New Jersey Supreme Court upheld the Appellate Court decision<sup>10</sup> and ordered COAH to prepare the necessary rules. COAH failed to adopt new rules, and more challenges ensued.

On March 10, 2015, the New Jersey Supreme Court issued a ruling on Fair Share Housing Center’s (“FSHC’s”) Motion in Aid of Litigant’s Rights, which became known as Mount Laurel IV.<sup>11</sup> In this decision, the Court transferred responsibility for reviewing and approving housing elements and fair share plans from COAH to designated Mount Laurel trial judges, declaring COAH “moribund.” Municipalities were now to apply to the Courts, instead of COAH, if they wished to be protected from exclusionary zoning lawsuits. The Mount Laurel trial judges, with the assistance of a Court-appointed Special Adjudicator, were tasked with reviewing municipal plans much in the same manner as COAH had done previously. Those towns whose plans

<sup>8</sup> In re Adoption of N.J.A.C. 5:94 and 5:95, 390 N.J. Super. 1 (2007)

<sup>9</sup> In re Adoption of N.J.A.C. 5:96 and 5:97, 416 N.J. Super. 462 (2010)

<sup>10</sup> In re Adoption of N.J.A.C. 5:96 and 5:97 by New Jersey Council On Affordable Housing, 215 N.J. 578 (2013)

<sup>11</sup> In re Adoption of N.J.A.C. 5:96 & 5:97, 221 NJ 1 (2015)

were approved by the Court received a Judgment of Compliance and Repose, the court equivalent of COAH's substantive certification.

While the New Jersey Supreme Court's decision set a process in motion for towns to address their Third Round obligation, the decision did not assign those obligations. Instead, that was to be done by the trial courts, although ultimately most towns entered into settlement agreements to set their fair share obligations. The Court stated that municipalities should rely on COAH's Second Round rules (N.J.A.C. 5:93) and those components of COAH's 2008 regulations that were specifically upheld, as well as the FHA, in their preparation of Third Round housing elements and fair share plans.

On January 17, 2017, the New Jersey Supreme Court rendered a decision<sup>12</sup> that found that the period between 1999 and 2015, now known as the "gap period," when no valid affordable housing regulations were in force, generated an affordable housing obligation. This obligation required an expanded definition of the municipal Present Need obligation to include the unaddressed housing needs of low- and moderate-income households that had formed during the gap period. This meant that the Third Round municipal affordable housing obligation would now comprise the following components: Present Need (rehabilitation), Prior Round (1987-1999, new construction), Third Round Gap Need (1999-2015, new construction), and Third Round Prospective Need (2015 to 2025, new construction).

### *Third Round Legislative Activity*

The New Jersey Legislature has amended the FHA several times in recent years.

On July 17, 2008, P.L. 2008 c. 46 (referred to as the "Roberts Bill" or "A500") was enacted, which amended the FHA in a number of ways. Key provisions included the following:

- It established a statewide 2.5% nonresidential development fee instead of requiring nonresidential developers to provide affordable housing;
- It eliminated new regional contribution agreements ("RCAs") as a compliance technique available to municipalities; previously a municipality could fund the transfer up to 50% of its fair share to so called "receiving" municipalities;
- 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; and
- It added a requirement that municipalities had to commit to spend development fees within four years of the date of collection. This was later addressed in a

<sup>12</sup> *In Re Declaratory Judgment Actions Filed by Various Municipalities*, 227 N.J. 508 (2017)

Superior Court decision which found the four-year period begins at the time the Court approves the municipal spending plan.<sup>13</sup>

In July 2020, the State amended the FHA again to require, beginning in November 2020, that all affordable units that are subject to affirmative marketing requirements also be listed on the state's Affordable Housing Resource Center website.<sup>14</sup> All affordable housing affirmative marketing plans are now required to include listing on the State Affordable Housing Resource Center website.

### **The Fourth Round (2025-2035)**

On March 20, 2024, the New Jersey Legislature passed P.L. 2024 c.2, which amended the FHA and other statutes to:

- Formally abolish COAH;
- Require the state Department of Community Affairs ("DCA") to promulgate municipal obligations using an adjusted methodology. These obligations are to be considered advisory, not binding;
- Establish a timeline within which municipalities need to adopt and submit binding resolutions stipulating to their Fourth Round fair share obligations, in order for them to retain their immunity from exclusionary-zoning lawsuits;
- Require the New Jersey Housing and Mortgage Finance Agency ("HMFA") and DCA to update rules and standards governing affordable housing production, trust funds, and affordable housing administration;
- Establish a Court-based Affordable Housing Dispute Resolution Program ("Program") that will be responsible for challenges to municipalities' affordable housing obligation determinations and compliance efforts;
- Establish a longer control period – 40 years, rather than 30 years – for new affordable rental units;
- Change the criteria for affordable housing bonuses, making various additional categories of affordable housing eligible for bonuses;
- Establish a timeline within which municipalities need to take various steps toward adoption of a Housing Element and Fair Share Plan, in order for them to retain their immunity from exclusionary-zoning lawsuits;

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<sup>13</sup> In the Matter of the Adoption of the Monroe Township Housing Element and Fair Share Plan, and Implementing Ordinances (2015)

<sup>14</sup> <https://www.nj.gov/njhrc/>



- Establish new reporting and monitoring procedures and deadlines for both affordable units and affordable housing trust funds and assign oversight for reporting and monitoring to DCA.

In December 2024, the Administrative Office of the Courts issued Administrative Directive #14-24, establishing procedures for implementation of the Program and for municipalities to file their Fourth Round Declaratory Judgment (“DJ”) filings, etc. As detailed under the section covering requirements of an HEFSP, the Administrative Directive also set requirements for what must be included in a compliant Fourth Round HEFSP.

This plan has been prepared to meet the requirements of the FHA as most recently amended, as well as the 2024 Administrative Directive and all applicable regulations.

## **HADDON’S AFFORDABLE HOUSING HISTORY**

Haddon Township has demonstrated a commitment to comply with its Mount Laurel fair share obligations. The Township has voluntarily addressed its constitutional affordable housing obligation in response to the FHA, at N.J.S.A. 52:27D-301 *et seq.*, and COAH’s substantive regulations at N.J.A.C. 5:93 and 5:97, respectively. As described below, the Township received a Judgment of Repose from the court on March 6, 2001, for its Second Round HEFSP, and filed a Declaratory Judgment action on January 22, 2009, for Third Round compliance.

### **Haddon Township’s Prior Round (1987-1999)**

In the First Round, COAH had assigned Haddon Township a zero-unit new construction obligation and a 42-unit rehabilitation share (based on the 1980 census). On June 2, 2000, the Township adopted an HEFSP to address its Second Round 12-year cumulative new construction component of 36 and its rehabilitation share of 68 (based on the 1990 census). The Township received a Judgment of Repose from the Court on March 6, 2001, for its Second Round HEFSP.

### **Haddon Township’s Third Round (1999-2025)**

On January 22, 2009, the Township voluntarily filed a Third Round Declaratory Judgment (“DJ”) action, seeking a Judgment of Compliance and Repose (“JOR”) for its Third Round HEFSP. In its 2009 HEFSP, the Township relied on continued participation in the Camden County Home Improvement Program to address its Third Round Present Need of 42, fully addressed its Prior Round Prospective Need of 35, and relied upon Prior Round surplus credits to address its Third Round growth share obligation of 40.

In or around June 2009, FSHC, Rose Hill Estates LLC and Albertson Urban Renewal LLC, (collectively “Rose Hill”) moved to intervene in the Township’s DJ action, as



**Township of Haddon**  
**Fourth Round Housing Element and Fair Plan**

**Adopted June 4, 2025**

described in further detail below. The Court filed an Order permitting both FSHC and Rose Hill to intervene. Around the same time, FSHC also filed an action in lieu of prerogative writs, challenging the Planning Board's approval of a mixed residential and commercial redevelopment without an on-site affordable housing set-aside at the location of the former Dy-Dee Diaper facility. The Township entered into settlement agreements in both matters. Both inclusionary family rental developments are now built and occupied, and both include affordable units.

On July 7, 2015, the Township filed a DJ action in accordance with Mount Laurel IV. Through the DJ process, the Township and FSHC agreed to settle as memorialized in a Settlement Agreement dated July 30, 2020, and signed August 20, 2020. The Court Order approving the Settlement Agreement was issued on October 28, 2020. The court-approved 2020 FSHC Settlement established the Township's Third Round affordable housing obligations including the Prior Round Prospective Need of 35, per COAH, and the Third Round Gap/Prospective Need of 198.

On May 1, 2025, FSHC preliminarily signed an Amended Settlement Agreement which the Township anticipates approval on May 27, 2025 (Appendix A). The preliminary 2025 Amended Third Round Settlement contains changes to the Township's Third Round compliance mechanisms. These changes included replacing a prior undetermined Site Downtown with an inclusionary redevelopment site ("Wells Fargo/600 Cuthbert redevelopment") to produce between 27 and 36 family affordable rental units, four (4) additional family affordable rental units at the Old Thriftway redevelopment site, and a balance of between 23 and 32 affordable units to be addressed in this Fourth Round HEFSP.

### **Haddon Township's Fourth Round (2025-2035)**

This Fourth Round HEFSP addresses Haddon Township's cumulative fair share obligations including the Township's Fourth Round affordable housing obligations pursuant to the FHA as amended in March 2024 (P.L. 2024, c.2). This plan has been prepared in accordance with the new law and Administrative Directive #14-24, issued by the Administrative Office of the Courts on December 13, 2024. On January 28, 2025, the Haddon Township Board of Commissioners adopted Resolution #2025-17 accepting the determination of the Township's Fourth Round Present Need of 35, based on the 2020 census and Fourth Round Prospective Need of 69 by DCA pursuant to its October 2024 Fourth Round Methodology Report. On January 29, 2025, the Township filed its Fourth Round DJ action with the Program/Superior Court, pursuant to the requirements of the amended FHA and the Administrative Directive #14-24. The Township subsequently received a Court order on March 28, 2025, approving the Township's Fourth Round obligations. The Township's Fourth Round DJ Action, binding resolution, and Court Order affirming the Township's Fourth Round obligations are contained in Appendix B.

## **AFFORDABILITY REQUIREMENTS**

Affordable housing is defined under the amended FHA as a dwelling, either for sale or rent that is within the financial means of households of very low-, low- or moderate-income as income is measured within each housing region. Haddon is in Region 5, which includes the Counties of Burlington, Camden and Gloucester. Moderate-income households are those earning between 50% and 80% of the regional median income. Low-income households are those with annual incomes that are between 30% and 50% of the regional median income. Very low-income households have annual incomes of 30% or less of the regional median income.

Through UHAC found at N.J.A.C. 5:80-26.1 *et seq.*, the maximum rent for a qualified unit must be affordable to households that earn no more than 60% of the median income for the region. The average rent must be affordable for households earning no more than 52% of the median income. The maximum sale prices for affordable units must be affordable for households that earn no more than 70% of the median income. The average sale price must be affordable for a household that earns no more than 55% of the median income.

The regional median income is now defined in the amended FHA and continues to utilize HUD income limits on a regional basis. In the spring of each year HUD releases updated income limits which will be reallocated to the six (6) regions. It is from these income limits that the rents and sale prices for affordable units are derived. See Table 1 for 2024 income limits for Region 5 and Tables 2 and 3 for illustrative sale prices and gross rents from 2024 (the latest figures available). The rents and sale prices are illustrative and are gross figures which do not account for the specified utility allowance for rentals.

**Table 1. Income Limits for Region 5, 2024**

<b>Household Income Level</b>	<b>1 Person Household</b>	<b>2 Person Household</b>	<b>3 Person Household</b>	<b>4 Person Household</b>	<b>5 Person Household</b>
Median	\$80,290	\$86,025	\$91,760	\$103,230	\$114,700
Moderate	\$64,232	\$68,820	\$73,408	\$82,584	\$91,760
Low	\$40,145	\$43,013	\$45,880	\$51,615	\$57,350
Very Low	\$24,087	\$25,808	\$27,528	\$30,969	\$34,410

Source: AHPNJ, 2024 Affordable Housing Regional Income Limits by Household Size

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**Table 2. Illustrative Affordable Rents for Region 5, 2024**

Household Income Level (% of Median Income)	1 Bedroom Unit Rent	2 Bedroom Unit Rent	3 Bedroom Unit Rent
Moderate (60% of Median)	\$1,290	\$1,548	\$1,789
Low (50% of Median)	\$1,075	\$1,290	\$1,491
Very Low (30% of Median)	\$645	\$774	\$895

Source: AHPNJ Affordable Housing Regional Income Limits and Rental Calculator

**Table 3. Illustrative Affordable Sales Prices for Region 5, 2024**

Household Income Levels (% of Median Income)	1 Bedroom Unit Price	2 Bedroom Unit Price	3 Bedroom Unit Price
Moderate (70% of Median)	\$115,767	\$146,601	\$175,379
Low (50% of Median)	\$71,718	\$93,743	\$114,839
Very Low (30% of Median)	\$27,670	\$40,884	\$53,218

Source: AHPNJ Affordable Housing Regional Income Limits and Sales Calculator

## **HOUSING ELEMENT AND FAIR SHARE PLAN REQUIREMENTS**

In accordance with the Municipal Land Use Law (N.J.S.A. 40:55D-1 *et seq.*), a municipal master plan must include a housing plan element as the foundation for the municipal zoning ordinance (see N.J.S.A. 40:55D-28b(3)). Pursuant to the FHA (N.J.S.A. 52:27D-301 *et seq.*), a municipality's housing element must be designed to provide access to affordable housing to meet present and prospective housing needs, with particular attention to low- and moderate-income housing. Specifically, N.J.S.A. 52:27D-310 requires that the housing element contain at least the following (*emphasis added*):

- 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;*
- 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;*

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- 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 of low- and moderate-income housing and its capacity to accommodate its present and prospective housing needs, including its fair share of low- and moderate-income housing, as established pursuant to section 3 of P.L. 2024, c.2 (C.52:27D-304.1);
- f. A consideration of the lands most appropriate for construction of low- and moderate-income housing and of the existing structures most appropriate for conversion to, or rehabilitation for, low- and moderate-income housing, including a consideration of lands of developers who have expressed a commitment to provide low and moderate income housing;
- 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 23 section 1 of P.L.2021, c.273 (C.52:27D-329.20); and
- 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.

In addition to FHA requirements, this Fourth Round HEFSP has been prepared in compliance with the following requirements set forth by Administrative Directive #14-24, issued by the Administrative Office of the Courts on December 13, 2024:

- 1. One of the requirements for a final HEFSP is the inclusion of 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

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identification of each of the sites that were proposed for such development and rejected, along with the reasons for such rejection.

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 FHA and 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.*

*The HEFSP must also include (in an Appendix) all adopted ordinances and resolutions needed to implement the HEFSP, including:*

1. *All zoning amendments (or redevelopment plans, if applicable).*
2. *An Affordable Housing Ordinance that includes, among other required regulations, its applicability to 100 percent affordable and tax credit projects, the monitoring and any reporting requirements set forth in the settlement agreement, requirements regarding very low income housing and very low*

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*income affordability consistent with the FHA and the settlement agreement, provisions for calculating annual increases in income levels and sales prices and rent levels, and a clarification regarding the minimum length of the affordability controls (at least 30 years, until the municipality takes action to release the controls).*

3. *The adoption of the mandatory set aside ordinance, if any, and the repeal of the existing growth share provisions of the code.*
4. *An executed and updated Development Fee Ordinance that reflects the court's jurisdiction.*
5. *An Affirmative Marketing Plan adopted by resolution that contains specific directive to be followed by the Administrative Agent in affirmatively marketing affordable housing units, with an updated COAH form appended to the Affirmative Marketing Plan, and with both documents specifically reflecting the direct notification requirements set forth in the settlement agreement.*
6. *An updated and adopted Spending Plan indicating how the municipality intends to allocate development fees and other funds, and detailing (in mini manuals) how the municipality proposes to expend funds for affordability assistance, especially those funds earmarked for very low income affordability assistance.*
7. *A resolution of intent to fund any shortfall in the costs of the municipality's municipally sponsored affordable housing developments as well as its rehabilitation program, including by bonding if necessary.*
8. *Copies of the resolution(s) and/or contract(s) appointing one or more Administrative Agent(s) and of the adopted ordinance creating the position of, and resolution appointing, the Municipal Affordable Housing Liaison.*
9. *A resolution from the Planning Board adopting the HEFSP, and, if a final Judgment is sought before all of the implementing ordinances and resolutions can be adopted, a resolution of the governing body endorsing the HEFSP.*

Consistent with N.J.A.C. 5:93-5.5, any municipally sponsored 100 percent affordable housing development will be required to be shovel-ready within two (2) years of the deadlines set forth in the settlement agreement:

1. *The municipality will be required to submit the identity of the project sponsor, a detailed pro forma of project costs, and documentation of available funding to the municipality and/or project sponsor, including any pending applications for funding, and a commitment to provide a stable alternative source, in the form of a resolution of intent to fund shortfall, including by bonding, if*



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*necessary, in the event that a pending application for outside funding has not yet been not approved*

2. *Additionally, a construction schedule or timetable must be submitted setting forth each step in the development process, including preparation and approval of a site plan, applications for state and federal permits, selection of a contractor, and start of construction, such that construction can begin within two (2) years of the deadline set forth in the settlement agreement.*

## **HOUSING CONDITIONS**

A summary of Haddon's housing stock by occupancy and number of units is shown in Table 4. Haddon Township's housing stock consists of an estimated 7,348 housing units, of which 60.9% are owner-occupied, 31.7% are renter-occupied, and 7.4% are vacant. Housing types are predominantly single-family detached units (64.1%) and apartment buildings containing 20 or more units (20.1%).

**Table 4. Housing Units by Number of Units in Structure and Tenure, 2023**

Number of Units in Structure	Owner-Occupied		Renter-Occupied		Vacant		Total	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
1, Detached	4,310	58.7%	137	1.9%	261	3.6%	4,708	64.1%
1, Attached	54	0.7%	92	1.3%	0	0.0%	146	2.0%
2	29	0.4%	134	1.8%	0	0.0%	163	2.2%
3 or 4	0	0.0%	327	4.5%	65	0.9%	392	5.3%
5 to 9	0	0.0%	43	0.6%	59	0.8%	102	1.4%
10 to 19	15	0.2%	273	3.7%	69	0.9%	357	4.9%
20 or more	67	0.9%	1,320	18.0%	93	1.3%	1,480	20.1%
Mobile Home	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Other	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>4,475</b>	<b>60.9%</b>	<b>2,326</b>	<b>31.7%</b>	<b>547</b>	<b>7.4%</b>	<b>7,348</b>	<b>100%</b>

Source: Table B25032 and Table DP04, U.S. Census Bureau, 2019-2023 American Community Survey Five-Year Estimates

The estimated age of Haddon's housing stock is shown in Table 5. The median year of construction of all housing units in Haddon is 1954, which is older than that of the County (1968) and the State (1969). Approximately 80% of the Township's housing

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stock was built prior to 1970, and 20% was built between 1970 and 2020. Owner-occupied units are generally older than renter-occupied units.

**Table 5. Housing Units by Age, 2023**

Year Built	Owner-Occupied		Renter-Occupied		Vacant		Total	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
2020 or later	0	0.0%	0	0.0%	0	0.0%	0	0%
2010 to 2019	12	0.2%	299	4.1%	69	0.9%	380	5.2%
2000 to 2009	75	1.0%	0	0.0%	0	0.0%	75	1.0%
1990 to 1999	97	1.3%	15	0.2%	0	0.0%	112	1.5%
1980 to 1989	20	0.3%	198	2.7%	30	0.4%	248	3.4%
1970 to 1979	24	0.3%	496	6.8%	28	0.4%	548	7.5%
1960 to 1969	689	9.4%	578	7.9%	74	1.0%	1,341	18.2%
1950 to 1959	1371	18.7%	228	3.1%	175	2.4%	1774	24.1%
1940 to 1949	472	6.4%	360	4.9%	63	0.9%	895	12.2%
1939 or earlier	1715	3.3%	152	2.1%	108	1.5%	1,975	26.9%
<b>Total</b>	<b>4,475</b>	<b>60.9%</b>	<b>2,326</b>	<b>31.7%</b>	<b>547</b>	<b>7.4%</b>	<b>7,348</b>	<b>100%</b>
<b>Median Year Built</b>	<b>1950</b>		<b>1967</b>		<b>(X)</b>		<b>1954</b>	

Sources: Table B25036, Table B25037, and Table DP04, U.S. Census Bureau, 2019-2023 American Community Survey Five-Year Estimates

Table 6 summarizes the estimated number of rooms per unit in Haddon. The median number of rooms per unit is 6.2, and approximately 60% of units have more than six rooms. The median number of rooms per unit in the Township (6.2 rooms) is higher than the County (6.0 rooms) and State (5.7 rooms).



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**Table 6. Number of Rooms per Housing Unit, 2023**

Rooms per Unit	Units	Percent
1	49	0.7%
2	364	5.0%
3	685	9.3%
4	1,027	14.0%
5	717	9.8%
6	1,259	17.1%
7	1,276	17.4%
8	1,053	14.3%
9+	918	12.5%
<b>Total</b>	<b>7,348</b>	<b>100%</b>
<b>Median</b>	<b>6.2 rooms</b>	

Source: Table DPo4 U.S. Census Bureau, 2019-2023 American Community Survey Five-Year Estimates

As shown in Table 7, an estimated 61.3% of housing units in the Township contain at least three (3) bedrooms, while an estimated 19.4% of units contain at least four (4) bedrooms. Efficiency (studio) units comprise less than 1% of the Township housing stock, while one-bedroom and two-bedroom units comprise an estimated 21.1% and 16.8% of all units, respectively.

**Table 7. Number of Bedrooms per Housing Unit, 2023**

Bedrooms per Unit	Units	Percent
Efficiency (Studio)	57	0.8%
1	1,552	21.1%
2	1,238	16.8%
3	3,082	41.9%
4	1,150	15.7%
5+	269	3.7%
<b>Total</b>	<b>7,348</b>	<b>100%</b>

Source: Table DPo4, U.S. Census Bureau, 2019-2023 American Community Survey Five-Year Estimates

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Table 8 shows the estimated value of owner-occupied units in Haddon in 2013 and 2023. Without adjusting for inflation, the estimated median home value in the Township grew by 50.1% from \$242,100 to \$363,400 between 2013 and 2023. This increase is much steeper than the increase of 5.6% in New Jersey and 24.4% in Camden County.

Based on AHPNJ's 2024 Illustrative Sales Prices (See Table 3), possibly no more than 3.3% (150 units) of for-sale housing units within the Township may be considered affordable to low- and moderate-income households in 2023.

**Table 8. Value of Owner-Occupied Housing Units, 2013 and 2023**

Housing Unit Value	2013		2023	
	Units	Percent	Units	Percent
Less than \$50,000	100	2.2%	62	1.4%
\$50,000 to \$99,999	55	1.2%	28	0.6%
\$100,000 to \$149,999	360	7.8%	60	1.3%
\$150,000 to \$199,999	745	16.2%	134	3.0%
\$200,000 to \$299,999	2277	49.5%	1,113	24.9%
\$300,000 to \$499,999	965	21.0%	2,418	54.0%
\$500,000 to \$999,999	85	1.8%	586	13.1%
\$1,000,000 or more	12	0.3%	74	1.7%
<b>Total</b>	<b>4,599</b>	<b>100%</b>	<b>4,475</b>	<b>100%</b>
<b>Median Value</b>	<b>\$242,100</b>		<b>\$363,400</b>	

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Table 9 shows gross rent estimates in Haddon Township and Camden County for 2023. The median rent in Haddon (\$1,723) is estimated to be approximately \$380 higher than the median rent of Camden County (\$1,346). Approximately 4 out of 5 renters in the Township pay less than \$2,000 in rent. Based on AHPNJ's Illustrative Affordable Rents for 2024 (see Table 2), up to 771 units (33% of the total estimated rental units) may be affordable for low- and moderate-income renters, depending on the number of bedrooms present.

**Table 9. Gross Rent by Housing Unit, 2023**

Gross Rent	Haddon Township		Camden County	
	Units	Percent	Units	Percent
Less than \$500	131	5.6%	5,179	7.6%
\$500 to \$999	107	4.6%	10,664	15.6%
\$1,000 to \$1,499	533	22.9%	25,940	38.0%
\$1,500 to \$1,999	880	37.8%	16,814	24.6%
\$2,000 to \$2,499	509	21.9%	6,656	9.7%
\$2,500 to \$2,999	83	3.6%	1,667	2.4%
\$3,000 or More	83	3.6%	1,367	2.0%
No rent paid	0	0.0%	1,852	(X)
<b>Total</b>	<b>2,326</b>	<b>100%</b>	<b>68,287</b>	<b>100%</b>
<b>Median Rent</b>	<b>\$1,723</b>		<b>\$1,346</b>	

Source: Table DP04, U.S. Census Bureau, American Community Survey 5-Year Estimates 2019-2023

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Housing is generally considered to be affordable if the costs of rents, mortgages, and other essential housing costs consume 28% or less of an owner-household's income or 30% or less of a renter-household's income. Table 10 shows the percentage of income spent on housing costs by households of owner-occupied and renter-occupied units in Haddon. An estimated 32.0% of all households in the Township spend more than 30% of their income on housing costs, including 16.1% of owner-occupied units and 15.3% of renter-occupied units.

**Table 10. Housing Affordability by Tenure, 2023**

Monthly Housing Costs as Percent of Income	Owner-Occupied		Renter-Occupied		All Occupied	
	Units	Percent	Units	Percent	Units	Percent
Less than 20 Percent	2,396	36.6%	503	7.7%	2,899	41.2%
20 to 29 Percent	1017	15.5%	581	8.9%	1,598	26.8%
30 Percent or More	1,053	16.1%	1,004	15.3%	2,057	32.0%
<b>Total</b>	<b>4,466</b>	<b>68.1%</b>	<b>2,088</b>	<b>31.9%</b>	<b>6,554</b>	<b>100%</b>
*Remainder of occupied units have zero or negative income and/or no cash rent.						

Source: Table DP04, U.S. Census Bureau, 2019-2023 American Community Survey Five-Year Estimates

Table 11 shows the number of units in Haddon that may possess indicators of housing deficiency. The FHA defines a *deficient housing unit* as “housing that (1) is over fifty years old and overcrowded, (2) lacks complete plumbing, or (3) lacks complete kitchen facilities.” Note that these estimates are not synonymous with the Township’s Present Need/Rehabilitation obligation of 35. Further, units may meet more than one indicator of housing deficiency. In Haddon, an estimated 6,085 units, or 89.5% of the Township’s housing stock, will be more than 50 years old by 2029, and between 0.5% and 1.1% of units were estimated to have incomplete plumbing, incomplete kitchens, and/or crowded conditions.

**Table 11: Indicators of Housing Deficiency, 2023**

Indicator	Units	Percent
50+ Years Old*	6,085	89.5%
Incomplete Plumbing	31	0.5%
Incomplete Kitchen	73	1.1%
Crowded or Overcrowded and Built pre-1950	59	0.9%
*Includes all units built prior to 1979.		

Source: Table B25050, Table 25052, and Table 25036, U.S. Census Bureau, 2019-2023 American Community Survey Five-Year Estimates.

## POPULATION CHARACTERISTICS

A comparison of population changes by census year in Haddon Township and Camden County is shown in Table 12. Similar to most of the country, the most rapid population growth in the Township occurred in the decades following World War II (1940-1970). The Township population experienced a decline of 3,541 (22.3%) between 1980 and 2000 before experiencing a resurgence of population growth in 2020. As shown in Table 12, Camden County experienced population growth since 1950 before stabilizing around 2000.

**Table 12. Population Change, 1950 to 2023**

Year	Haddon Township		Camden County	
	Population	Percent Change	Population	Percent Change
1950	12,379	+27.5%	300,743	+ 17.6%
1960	17,099	+38.1%	392,035	+ 30.4%
1970	18,192	+6.4%	456,291	+ 16.4%
1980	15,875	-12.7%	471,650	+ 3.4%
1990	14,837	-6.5%	502,824	+ 6.6%
2000	14,651	-1.3%	508,932	+ 1.2%
2010	14,707	+0.4%	513,657	+ 0.9%
2020	15,407	+4.8%	523,485	+ 1.9%
2023*	15,398	< -0.1%	524,042	-0.1%
*Estimate provided by American Community Survey (not Decennial Census)				

Sources: U.S. Census Bureau, Decennial Census 1950-2020; Table S0101: U.S. Census Bureau, 2019-2023 American Community Survey Five-Year Estimates

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Population estimates for each age cohort in the Township in 2013 and 2023 are shown in Table 13. While the total population has increased by 4.9%, the distribution among age groups has shifted. Between 2013 and 2023, the Township is estimated to have experienced significant growth of the age 5-19 cohort and the 60-74 cohort and a decrease in the number of residents age 20-24 and 85 or older. Due in part to these population shifts, the estimated median age in Haddon decreased from 43.1 in 2013 to 40.3 in 2023.

**Table 13. Age of Population, 2013 and 2023**

Age in Years	2013		2023		Percent Change 2013-2023
	Population	Percent	Population	Percent	
Under 5	942	6.4%	902	5.9%	-4.2%
5 to 9	682	4.6%	831	5.4%	+21.8%
10 to 14	860	5.9%	1,127	7.3%	+31.0%
15 to 19	692	4.7%	931	6.0%	+34.5%
20 to 24	733	5.0%	543	3.5%	-25.9%
25 to 34	1,934	13.2%	2,264	14.7%	+17.1%
35 to 44	2181	14.9%	1,981	12.9%	-9.2%
45 to 54	2192	14.9%	1,936	12.6%	-11.7%
55 to 59	1,077	7.3%	983	6.4%	-8.7%
60 to 64	726	4.9%	985	6.4%	+35.7%
65 to 74	1,457	9.9%	1,801	11.7%	+23.6%
75 to 84	750	5.1%	773	5.0%	+3.1%
85+	455	3.1%	341	2.2%	-25.1%
<b>Total</b>	<b>14,681</b>	<b>100%</b>	<b>15,398</b>	<b>100%</b>	<b>+4.9%</b>
<b>Median Age</b>	<b>43.1</b>		<b>40.3</b>		<b>(X)</b>

Source: Table DP05, U.S. Census Bureau, 2009-2013 American Community Survey Five-Year Estimates;  
Table DP05, U.S. Census Bureau, 2019-2023 American Community Survey Five-Year Estimates

## HOUSEHOLD CHARACTERISTICS

A household is defined by the U.S. Census Bureau, as those people who occupy a single room or group of rooms constituting a housing unit; however, these people may or may not be related. By comparison, a family is identified as a group of people including a householder and one or more persons related by blood, marriage or adoption, all living in the same household.

Table 14 shows a comparison of household size in Haddon in 2013 and 2023. During this period, household size decreased slightly from 2.37 to 2.26. The distribution of household sizes experienced a shift from two-person households to one-person households.

**Table 14. Household Size of Occupied Units, 2013-2023**

Household Size (Persons per Household)	2013		2023	
	Units	Percent	Units	Percent
1	1,836	29.7%	2,705	39.8%
2	2,293	37.1%	1,960	28.8%
3	915	14.8%	947	13.9%
4+	1,137	18.4%	1,189	17.5%
<b>Total</b>	<b>6,181</b>	<b>100%</b>	<b>6,801</b>	<b>100%</b>
<b>Average Household Size</b>	<b>2.37</b>		<b>2.26</b>	

Source: Table S1101 and Table S2501, U.S. Census Bureau, 2019-2023 American Community Survey Five-Year Estimates

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Household and family composition estimates in Haddon are shown in Table 15. Approximately 42.5% of households are married couples, of which less than half are married couples with children. An estimated 33.1% of households consist of a female householder with no spouse or children present, compared to 16.1% of male householders with no spouse or children. Approximately 25.8% of households consist of one householder living alone.

**Table 15. Household Composition, 2023**

<b>Household Type</b>	<b>Households</b>	<b>Percent of Total</b>
Married-couple family	2,893	42.5%
With Children	1,312	19.3%
Without Children Under 18	1,581	23.2%
Cohabiting couple household	354	5.2%
With Children Under 18	33	0.5%
Without Children Under 18	321	4.7%
Male householder, no spouse present	1,171	17.2%
With Children Under 18	78	1.1%
Without Children Under 18	1,093	16.1%
Female householder, no spouse present	2,383	35.0%
With Children Under 18	132	1.9%
Without Children Under 18	2,251	33.1%
Householder living alone	1,757	25.8%
<b>Total Households</b>	<b>6,801</b>	<b>100%</b>

*Source:* Table DP02, U.S. Census Bureau, 2019-2023 American Community Survey Five-Year Estimates



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## **INCOME CHARACTERISTICS**

A summary of household income characteristics in Haddon is shown in Table 16. In 2023, the median household income in Haddon was \$112,255 or approximately \$26,000 above Camden County (\$86,384) and \$12,000 above the State median (\$101,050). The distribution of household incomes in Haddon is generally similar to the County and State, except that the percentage of households earning over \$100,000 is higher in the Township.

**Table 16. Household Income, 2023**

<b>Household Income</b>	<b>Households</b>	<b>Percent</b>
Less than \$10,000	401	5.9%
\$10,000-\$14,999	192	2.8%
\$15,000-\$24,999	457	6.7%
\$25,000-\$34,999	286	4.2%
\$35,000-\$49,999	372	5.5%
\$50,000-\$74,999	675	9.9%
\$75,000-\$99,999	649	9.5%
\$100,000-\$149,999	1,607	23.6%
\$150,000-\$199,999	1,138	16.7%
\$200,000+	1,024	15.1%
<b>Total</b>	<b>6,801</b>	<b>100%</b>
<b>Median Household Income</b>	<b>\$112,255</b>	

*Source:* Table DP03, U.S. Census Bureau, 2019-2023 American Community Survey Five-Year Estimates

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A comparison of poverty rates in Haddon Township and Camden County is shown in Table 17. The estimated poverty rate among families and individuals in Haddon is 2.9% and 6.5%, respectively, which is significantly lower than the County poverty rates of 9.1% among families and 12.2% among individuals. The statewide poverty rate among families and individuals is also higher at 7.0% and 9.7%, respectively.

**Table 17. Poverty Rates Among Individuals and Families, 2023**

<b>Location</b>	<b>Poverty Rate, Family</b>	<b>Poverty Rate, Individual</b>
Haddon Township	2.9%	6.5%
Camden County	9.1%	12.2%
New Jersey	7.0%	9.7%

Source: Table S1701 and Table S1702, U.S. Census Bureau, 2019-2023 American Community Survey Five-Year Estimates.

## EMPLOYMENT CHARACTERISTICS

Estimated employment among Haddon residents by North American Industry Classification System (NAICS) categories is shown in Table 18. In 2023, the “Educational Services, and Health Care and Social Assistance” industry employed the largest percentage (27.3%) of Haddon residents in the labor force. The next largest industry sectors were “Professional, scientific, and management, and administrative and waste management services” (18.2%), and Retail Trade (9.8%).

**Table 18. Employed Residents by Industry Sector, 2023**

NAICS Industry	Employed Residents	Percent
Agriculture, forestry, fishing and hunting, and mining	0	0.0%
Construction	444	5.5%
Manufacturing	538	6.6%
Wholesale trade	179	2.2%
Retail trade	795	9.8%
Transportation and warehousing, and utilities	260	3.2%
Information	201	2.5%
Finance and insurance, and real estate and rental and leasing	701	8.6%
Professional, scientific, and management, and administrative and waste management services	1,480	18.2%
Educational services, and health care and social assistance	2,223	27.3%
Arts, entertainment, and recreation, and accommodation and food services	688	8.5%
Other services, except public administration	245	3.0%
Public administration	378	4.6%
<b>Civilian employed population 16 years and over</b>	<b>8,132</b>	<b>100%</b>

Source: Table DP03, U.S. Census Bureau, 2019-2023 American Community Survey Five-Year Estimates

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Employment by occupation category is shown in Table 19. While Haddon residents are employed in all occupation groups, the most common are “Management, Business, Science, and Art” (60.8%), “Sales and Office” (18.0%), and “Service” (11.8%).

**Table 19. Employed Residents by Occupation, 2023**

<b>Occupation</b>	<b>Employed Residents</b>	<b>Percent</b>
Management, Business, Science, Arts	4,943	60.8%
Service	961	11.8%
Sales and Office	1,465	18.0%
Natural Resources, Construction, Maintenance	237	2.9%
Production, Transportation, Material Moving	526	6.5%
<b>Civilian employed population 16 years and over</b>	<b>8,132</b>	<b>100%</b>

*Source:* Table DP03, U.S. Census Bureau, 2019-2023 American Community Survey Five-Year Estimates

Change in estimated employment among Haddon residents between 2013 and 2023 is shown in Table 20. Prior to 2020, the Township’s labor force and unemployment rate were relatively stable at approximately 8,200 workers and 6%, respectively. In or around 2020, the Township’s labor force grew by an estimated 800 workers, and the unemployment rate increased to 7.9% with a peak of 9.4% in 2022. The Township’s unemployment rate in 2023 was higher than that of New Jersey (6.2%) and Camden County (6.9%).

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**Table 20. Change in Employment, 2013-2023**

Year	Labor Force	Employed Residents	Unemployed Residents	Unemployment Rate
2013	8,202	7,741	461	5.6%
2014	8,251	7,711	540	6.5%
2015	8,346	7,799	547	6.6%
2016	8,362	7,827	535	6.4%
2017	8,361	7,902	459	5.5%
2018	8,291	7,810	481	5.8%
2019	8,260	7,807	453	5.5%
2020	8,334	8,334	656	7.9%
2021	8,950	8,202	748	8.4%
2022	9,077	8,227	850	9.4%
2023	8,954	8,132	822	9.2%

Source: Table DP03, U.S. Census Bureau, 2019-2023 American Community Survey Five-Year Estimates

Table 21 compares employment estimates within Haddon and Camden County regardless of where workers live. In 2022, an estimated 2,498 workers were employed in the Township, comprising 1.2% of the 207,678 total jobs in Camden County.

**Table 21. Estimated Employment, 2022**

Year	Haddon Township	Camden County
2023	2,498	207,678

Source: U.S. Census Bureau, OnTheMap Application and LEHD Origin-Destination Employment Statistics (Beginning of Quarter Employment, 2nd Quarter of 2002-2022).

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Common commuter destinations among Haddon residents are shown in Table 22. In 2022, the most common commuter destination was Philadelphia (17.9%), while other municipalities in Camden County and Burlington County were common. Approximately 249 residents, or 3.1% of all working residents, work within the Township.

**Table 22. Top Ten Commuting Destinations for Haddon Residents, 2022**

<b>Destination</b>	<b>Workers</b>	<b>Percent of Workers</b>
Philadelphia, PA	1,429	17.9%
Cherry Hill, NJ	523	6.5%
Camden, NJ	454	5.7%
Collingswood, NJ	378	4.7%
Mount Laurel, NJ	336	4.2%
Haddon, NJ	249	3.1%
Evesham, NJ	208	2.6%
Moorestown, NJ	196	2.5%
Voorhees, NJ	185	2.3%
Haddonfield, NJ	142	1.8%
All Other Locations	3,890	48.7%
<b>Total</b>	<b>7,990</b>	<b>100%</b>

*Source:* U.S. Census Bureau, OnTheMap Application and LEHD Origin-Destination Employment Statistics (Beginning of Quarter Employment, 2nd Quarter of 2002-2022).

## **POPULATION AND EMPLOYMENT PROJECTIONS**

The Delaware Valley Regional Planning Commission (“DVRPC”) is the Metropolitan Planning Organization (MPO) for the Greater Philadelphia region, which contains Haddon Township and all municipalities in Burlington County, Camden County, Gloucester County, Mercer County, and several counties in Pennsylvania. The DVRPC publishes population and employment forecasts for each county and municipality in the region. As shown in Table 23, projected increases in population and employment in Haddon Township between 2015 and 2050 are expected to be relatively congruent with the County but lower than the region.

**Table 23. Population and Employment Projections, 2015-2050**

Location	Population			Employment		
	Estimate 2015	Projected 2050	Percent Change	Estimate 2015	Projected 2050	Percent Change
Haddon Township	14,423	14,723	+2.1%	4,089	4,587	+12.2%
Camden County	507,692	519,476	+2.32%	235,055	263,284	+12.01%
DVRPC Region	5,705,895	6,206,332	+8.8%	3,038,721	3,505,516	+15.4%

Source: Delaware Valley Regional Planning Commission, Municipal and County-Level Population and Employment Forecasts, 2015-2050

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## HOUSING UNIT PROJECTIONS

The FHA requires that housing plans include a 10-year projection of new housing units based on the number of building permits, development applications approved, and probable developments, as well as other indicators deemed appropriate (N.J.S.A. 52:27D-310.b). Table 24 shows the balance of Certificates of Occupancy and Demolition Permits issued between 2013 and 2023. According to the permit data, there is an annual average net increase of seven (7) dwelling units per year. If this rate were to remain relatively constant, Haddon could see growth of approximately 84 new units by 2035.

**Table 24. Residential C.O.'s and Demolition Permits Issued, 2013-2023**

Year	Certificates of Occupancy	Demolitions	Net New Dwellings
2013	2	0	+2
2014	2	2	0
2015	45	12	+33
2016	25	0	+25
2017	8	1	+7
2018	4	2	+2
2019	3	2	+1
2020	8	0	+8
2021	1	0	+1
2022	0	0	0
2023	1	0	+1
<b>Total</b>	<b>99</b>	<b>19</b>	<b>+80</b>
<b>Annual Average</b>	<b>9</b>	<b>2</b>	<b>+7</b>

Source: NJDCA Construction Reporter, Building Permits, Yearly Summary Data



## **CONSIDERATION OF LAND FOR AFFORDABLE HOUSING**

Pursuant to the FHA at N.J.S.A. 52:27D-310.f, a HEFSP shall contain “a consideration of lands of developers who have expressed a commitment to provide low- and moderate-income housing.” As reflected in the preliminary May 2025 Amended Settlement Agreement between the Township and FSHC, there are two (2) significant inclusionary residential redevelopment sites that will come to fruition in the Fourth Round (although technically addressing the Township’s Third Round fair share obligations). In order to more quickly react to additional potential redevelopment opportunities, the Township shall adopt a Mandatory Affordable Housing Setaside Ordinance. At this point in time, the Township is virtually fully developed and additional opportunities for affordable housing production will come from both formal and informal redevelopment activity. As discussed further below, between the enactment of the Mandatory Affordable Housing Setaside Ordinance, the adoption of the Haddon Avenue Overlay Ordinance, the Township’s existing affordable housing development fee ordinance, the Township’s existing rent control ordinance, and these important additional redevelopment sites, the Township is poised to capture all suitable opportunities for affordable housing production throughout the Fourth Round and beyond to address the balance of its Third Round fair share as well as future affordable housing obligations. As part of this HEFSP, the Township has prepared an analysis of its vacant and developable land (known as a “vacant land analysis” or “VLA”), based on the procedures set forth at N.J.A.C. 5:93-4.2, as upheld by the Amended FHA, P.L. 2024, c.2, to determine its realistic development potential (“RDP”) for the Fourth Round (Appendix C). Sites that were determined to generate a Fourth Round RDP are summarized in Table 25.

**Table 25. Sites Generating Fourth Round RDP**

<b>Site</b>	<b>Block/Lot</b>	<b>Address</b>	<b>Net Area (ac.)</b>	<b>Density (du/ac.)</b>	<b>Total Units</b>	<b>RDP @ 20%</b>
Collings and Eldridge Ave	1.06/1 1.06/14 1.06/15	Collings Ave, 1503 Eldridge Ave, 1301 Eldridge Ave	0.46	14	6.4	<b>1.3</b>
Fmr. Newton Diner Site	8.10/26	931 White Horse Pike	0.72	16	11.5	<b>2.3</b>
59-61 Haddon Ave	21.11/3 21.11/6 21.11/7	69 Haddon Ave 1-3 Cooper Street	0.38	18	6.8	<b>1.4</b>
<b>Total</b>						<b>5</b>

## FAIR SHARE PLAN

### Haddon's Affordable Housing Obligation

A municipality's Fourth Round affordable housing obligation has four components: Fourth Round Present Need (Rehabilitation Share), Prior Round Prospective Need, Third Round "Gap"/Prospective Need, and Fourth Round Prospective Need. For Haddon Township, these four components were determined as follows.

The Township's Prior Round and Third Round Gap/Prospective Need were established by the 2020 Settlement Agreement approved by the Superior Court on October 28, 2020. In January 2025, the Township filed its Fourth Round DJ action, which included Township Resolution #2025-017 accepting the DCA calculation of its Fourth Round Present Need/Rehabilitation Share and Prospective Need, which the Fourth Round Prospective Need will be adjusted per the 2025 Fourth Round VLA. The entire four-component Fourth Round fair share obligation is as follows:

▪ Prior Round Prospective Need:	35
▪ Third Round Gap/Prospective Need:	198
▪ Fourth Round Prospective Need	69
▪ Fourth Round Present Need/Rehab Share	35

### Addressing Fourth Round Present Need

Haddon Township intends to address its Present Need/Rehabilitation Share of 35 units through continued participation in the Camden County Home Improvement Program ("HIP") that is available for rehabilitation of owner-occupied homes.

The Camden County HIP adheres to the regulations in N.J.A.C. 5:93-3.4. All new rehabilitated units will meet the applicable Uniform Construction Code requirements. Additionally, all rehabilitated units will be occupied by low- or moderate-income households and upon completion of the rehabilitation, affordability controls will be placed on the property in the form of a lien or deed restriction. All rehabilitations will have a minimum average hard cost of \$10,000.

### Addressing Prior Round Need

As the Amended FHA, P.L. 2024, c.2, upheld COAH's regulations for determining credits, COAH permits new construction credits, reductions, and bonuses to address the Prior Round obligation. In accordance with N.J.A.C. 5:93-5.6(e), the provision of affordable housing is required to be based on the issuance of permanent certificates of occupancy for new residential units.

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The Township has addressed the entirety of its Prior Round obligation of 35 with a combination of a 100% affordable age-restricted development, inclusionary housing developments and rental bonuses. In determining the obligation of the Prior Round, existing COAH rules require that the Township establish the maximum number of age-restricted affordable units<sup>15</sup> and the minimum number of affordable rental units<sup>16</sup> using the following formulas:

Minimum Rental Obligation = 9 units

$$= 0.25 (\text{Prior Round Obligation}) = 0.25 (35) = 8.75, \text{ rounded up}$$

Maximum Rental Bonus = 9

No more than the minimum rental obligation = 8.75 units, rounded up

With respect to rental bonuses, the housing plan adheres to the following limitations from N.J.A.C. 5:93: A rental unit available to the general public receives one rental bonus and no rental bonus is granted in excess of the Prior Round rental obligation.

Maximum Senior Units = 8

$$= 0.25 (\text{Prior Round Obligation}) = 0.25 (35) = 8.75, \text{ rounded down}$$

Minimum Low-Income Obligation = 13

$$= 0.50 (\text{Prior Round Units}) = 0.5 (26) = 13$$

*Prior Round Compliance Summary*

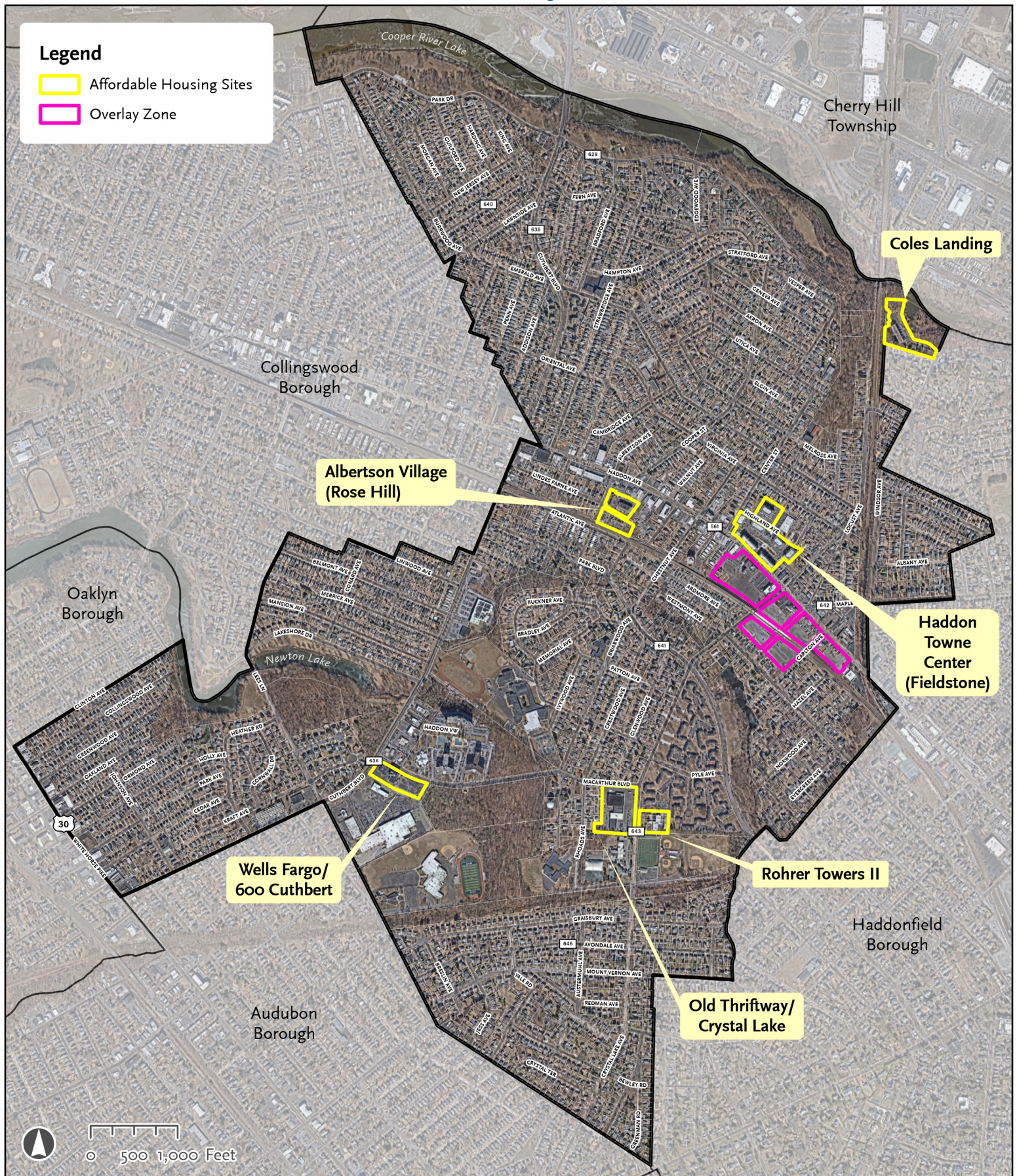
As summarized in Table 26, Haddon Township has addressed its Prior Round Prospective Need of 35 with a total of 26 units, consisting of eight (8) affordable senior rental units at Rohrer Towers II, eight (8) affordable family rental units at Rose Hill (Albertson Village), 10 affordable family rental units at Haddon Towne Center, and nine (9) Prior Round bonuses for a total of 35 credits/bonuses in the Prior Round.

Haddon Township has addressed its required minimum Prior Round rental obligation of nine (9) units with 26 completed rental units. The Township has addressed its senior unit maximum of eight (8) with eight (8) completed Rohrer Towers senior units. The Township has met its rental bonus maximum of nine (9) with a total of nine (9) rental bonuses from completed family affordable rental units. The Township has addressed its Prior Round minimum low-income unit obligation of 13 with a total of 17 low-income units including: eight (8) low-income senior units credited at Rohrer Towers II, four (4) low-income units at Albertson Village, and five (5) low-income units at Haddon Towne Center.

<sup>15</sup> N.J.A.C. 5:93-6.1(b)1 - revised per COAH Second Round policy

<sup>16</sup> N.J.A.C. 5:93-5.15(a)





Clarke Caton Hintz



Architecture

Planning

Landscape Architecture

FOURTH ROUND HOUSING ELEMENT AND FAIR SHARE PLAN

## Affordable Housing Sites

LOCATION:  
Haddon Township, Camden County, NJ

DATE:  
May 2025

### SOURCES:

Aerial Imagery  
Nearmap (October 17, 2024)

MOD-IV Tax Parcels (NJOGIS, 2024)



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**Table 26. Prior Round Credit Summary (1987-1999)**

<b>Haddon Township Prior Round Compliance Mechanisms (Prospective Need = 35)</b>	<b>Credits</b>	<b>Bonuses</b>	<b>Total</b>
<i>100% Affordable Site (Completed)</i>			
Rohrer Towers II – 100 affordable senior rentals, prior cycle credits (capped for settlement purposes)	8	-	8
<i>Inclusionary Developments (Completed)</i>			
Albertson Village (Rose Hill) – 8 affordable family rentals	8	8	16
Haddon Towne Center (Fieldstone) -10 of 25 afford family rentals	10	1	11
<b>Total</b>	<b>26</b>	<b>9</b>	<b>35</b>

*100% Affordable Site (Completed)*

*Rohrer Towers II – 8 of 100 units*

Rohrer Towers II is a 100-unit, 100% affordable, age-restricted development located at 300 Crystal Lake Avenue (Block 18.01, Lot 3) and built in 1981 using HUD project-based Section 8 funds. All affordable units have the appropriate affordability controls through the HUD Housing Assistance Payment (“HAP”) contract and are administered by Haddon Housing Associates in accordance with HUD regulations.

The original HUD affordability controls on the units were set to expire on March 17, 2011. The Township worked with Haddon Housing Associates to extend the controls beyond the end of the Third Round to March 16, 2031. To help Rohrer Towers II receive approval from HMFA and HUD for the extension of controls, the Township adopted Ordinance #1274 on February 22, 2011, which approved an extension of a payment in-lieu of taxes (“PILOT”) contract with Haddon Housing Associates for the project (see Appendix D for the agreement extending the rental subsidy agreement, Ordinance #1274 and the amended PILOT agreement).

On March 6, 2001, the Township received a Second Round JOR from the Honorable Theodore Z. Davis, P.J. Ch. (now retired) which approved the 100 affordable age-restricted rental units to address the Township’s cumulative First and Second Round obligation. The Order noted that the Township had “*demonstrated, to the satisfaction of this Court, that it is entitled, pursuant to applicable COAH standards, to (a) 49 credits for deteriorated units rehabilitated as a result of the Township’s participation in the Camden County Home Improvement Program, and (b) 100 credits for new affordable senior citizen units constructed in a project commonly referred to as ‘Rohrer Towers II.’ Thus the Township*

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*is entitled to 149 credits ... The total number of credits to which the Township is entitled ... exceeds the Township's fair share by 45 units (149-104=45)."*

Although the 2001 JOR indicates the Township is entitled to claim all 100 units at Rohrer Towers II, for purposes of settlement the Township agreed in the Third Round to claim eight (8) units, the maximum number of senior units permitted pursuant to the applicable formula, toward satisfaction of its Prior Round Prospective Need.

**Table 27. Income/Bedroom Distribution, Rohrer Towers II**

Income Distribution	Bedroom Distribution			Total
	1BR / Efficiency	2BR	3BR	
Very Low-Income	40	-	-	<b>40 (40%)</b>
Low-Income	60	-	-	<b>60 (60%)</b>
Moderate-Income	-	-	-	-
<b>Total</b>	<b>100 (100%)</b>	-	-	<b>100 (100%)</b>

*Inclusionary Developments (Completed)*

*Albertson Village (formerly Rose Hill) (Completed)*

Albertson Village is an inclusionary housing development at the intersection of Lindisfarne and Albertson Avenues (Block 20.02, Lots 1, 2, 3 and 29) that contains eight (8) affordable family rental units.

The development was issued certificates of occupancy ("COs") between September 22, 2015, and January 15, 2016. The affordable units have minimum 30-year controls through at least September 22, 2045, to January 15, 2046.

The affordable units are administered by Triad. The affordable family rental units include four (4) moderate-income units, three (3) low-income units, and one (1) very low-income unit. Six (6) units are two-bedroom units and include two (2) low-income units and the one (1) very low-income unit. The affordable units are affirmatively marketed and administered by Triad, a qualified and experienced affordable housing administrator. (See Appendix E for the deed restriction)

The income/bedroom distribution of Albertson Village units is summarized in Table 28.

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**Table 28. Income/Bedroom Distribution, Albertson Village**

Income Distribution	Bedroom Distribution			Total
	1BR / Efficiency	2BR	3BR	
Very Low-Income	-	1	-	1 (12.5%)
Low-Income	1	2	-	3 (37.5%)
Moderate-Income	1	3	-	4 (50%)
<b>Total</b>	<b>2 (25%)</b>	<b>6 (75%)</b>	<b>0*</b>	<b>8 (100%)</b>
* The balance of two (2) three-bedroom units were to be addressed off-site in a possible 100% Third Round affordable housing development which did not come to fruition.				

*Haddon Towne Center (formerly Fieldstone) – 10 of 25 units*

Haddon Towne Center is a 252-unit inclusionary mixed-use development that contains 25 affordable family rental units located on Haddon Avenue (Block 21.05, Lot 43; Block 21.06, Lot 12). The project was completed in 2017 and issued COs between January 18, 2017, and August 23, 2017. All affordable units have affordability controls of at least 30 years from April 29, 2017, through at least May 1, 2048. The affordable units are administered by Towne Center at Haddon Urban Renewal, LLC. A deed restriction is provided in Appendix F.

Income/bedroom distribution for the affordable units at Haddon Towne Center is summarized in Table 29.

**Table 29. Income/Bedroom Distribution, Haddon Towne Center**

Income Distribution	Bedroom Distribution			Total
	1BR / Efficiency	2BR	3BR	
Very Low-Income	1	1	1	3 (12%)
Low-Income	1	7	2	10 (40%)
Moderate-Income	3	7	2	12 (48%)
<b>Total</b>	<b>5 (20%)</b>	<b>15 (60%)</b>	<b>5 (20%)</b>	<b>25 (100%)</b>

The Township has applied 10 of the 25 affordable family rental units and one (1) Prior Round rental bonus for a total of 11 credits/bonuses toward the Township's Prior Round Prospective Need.

### Addressing Third Round Prospective Need

The Township has a Third Round Prospective Need of 198, as established through the Court-approved 2020 Settlement Agreement and reaffirmed by the May 2025 preliminary Amended Settlement Agreement. The Township will address this obligation through a combination of an existing 100% affordable development, the balance of existing affordable units at Haddon Towne Center (formerly Fieldstone), proposed inclusionary redevelopment of the Old Thriftway/Crystal Lake site, proposed inclusionary redevelopment of the Wells Fargo/600 Cuthbert site, permissible Third Round bonuses, and 23 to 32 units via other mechanisms to be discussed in the Fourth Round.

#### *Formulas Applicable to the Third Round*

In addition to satisfying its Third Round Prospective Need, the Township must adhere to Third Round requirements for a minimum rental obligation, a maximum number of senior units, and a maximum number of bonuses in the Third Round (based on N.J.A.C. 5:93). In addition, the Township must adhere to a minimum number of very low-income units pursuant to the 2008 amended FHA, as well as a minimum number of family units, a minimum number of family rental units, and a minimum number of family very low-income units pursuant to the terms of the FSHC Settlement Agreement. Units addressing the Township's Third Round Prospective Need must adhere to the following formulas:

$$\text{Minimum Rental Unit Obligation} = 50$$

$$= 0.25 \text{ (Third Round Prospective Need)} = 0.25 (198) = 49.5, \text{ rounded up}$$

$$\text{Maximum Rental Bonus} = 50$$

$$= \text{No more than the minimum rental obligation} = 50 \text{ units}$$

With respect to rental bonuses, the housing plan adheres to the following limitations from N.J.A.C. 5:93, a rental unit available to the general public receives one rental bonus.

$$\text{Minimum Family Rental Unit Obligation} = 25$$

$$= 0.50 \text{ (Third Round Min. Rental Unit Obligation)} = 0.50 (50) = 25 \text{ units}$$

$$\text{Minimum Family Unit Obligation} = 74$$

$$= 0.50 \text{ (Third Round Units)} = 0.50 (148) = 74$$

$$\text{Maximum Senior Unit Cap} = 49$$

$$= 0.25 \text{ (Third Round Prospective Need)} = 0.25 (198) = 49.5, \text{ round down}$$

$$\text{Minimum Low-Income Unit Obligation} = 74$$

$$= 0.50 \text{ (Third Round Units)} = 0.50 (148) = 74$$



*Third Round Compliance Summary*

As summarized in Table 30, the Township will address its Third Round obligation of 198 with 49 of 57 affordable senior units at Coles Landing (senior cap); 15 bal. of 25 affordable family rental units at Haddon Towne Center and 15 associated rental bonuses; 25 affordable family rental units through inclusionary redevelopment of the Old Thriftway/Crystal Lake site, between 27 and 36 affordable family rental units through proposed inclusionary redevelopment of the Wells Fargo/600 Cuthbert site, with 23 to 32 units via other mechanisms to be addressed in the Fourth Round, and Third Round bonuses.

Haddon Township will address its Third Round minimum rental unit obligation of 50 with a total of at least 116 and possibly 125 rental units, of which 64 are completed and 52 to 61 are proposed. The Township will address both its Third Round minimum family unit obligation of 74 and minimum family rental obligation of 25 with at least 74 family rental units, of which 15 are completed, 52 to 61 are proposed and the balance will be addressed through Fourth Round mechanisms. The Township's Third Round minimum low-income unit obligation of 74 will be addressed with a total of 84 to 88 low-income units including 49 low-income senior rentals credited at Coles Landing, eight (8) low-income units at Haddon Towne Center, 13 low-income units at the Old Thriftway/Crystal Lake site, and 14 to 18 low-income units at the Wells Fargo/600 Cuthbert site. The Township has not exceeded its Third Round maximum senior unit cap of 49 with 49 senior units from the existing 57-unit Coles Landing project.

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**Adopted June 4, 2025**

**Table 30. Third Round Credit Summary (1999-2025)**

<b>Haddon Township Third Round Compliance Mechanisms (Prospective Need = 198)</b>	<b>Credits</b>	<b>Bonuses</b>	<b>Total</b>
Rohrer Towers II – 45 senior rentals, pre-1986 prior cycle credits (not counted for Third Round FSHC settlement purposes)	-	-	-
<i>100% Affordable Site (Completed)</i>			
Coles Landing – 57 affordable senior rentals	49, cap	-	<b>49</b>
<i>Inclusionary Development (Completed)</i>			
Fieldstone (Haddon Towne Center) – 25 affordable family rentals (15 of 25, bal.)	15	15	<b>30</b>
<i>Inclusionary Redevelopment (Proposed)</i>			
Old Thriftway/Crystal Lake mixed-use Redevelopment – 161 total units w/ 15% set-aside = 25 affordable family rentals	25	25	<b>50</b>
Wells Fargo/600 Cuthbert Redevelopment – 180 to 240 total units w/ 15% set-aside = 27 to 36 affordable family rentals	27 to 36	10, cap	<b>37 to 46</b>
<b>Total</b>	<b>116 to 125</b>	<b>50</b>	<b>166 to 175</b>
Balance of 23 to 32 to be satisfied via other mechanisms as described in Fourth Round HEFSP			

*100% Affordable Site (Completed)*

*Coles Landing – 49 of 57 units (Completed)*

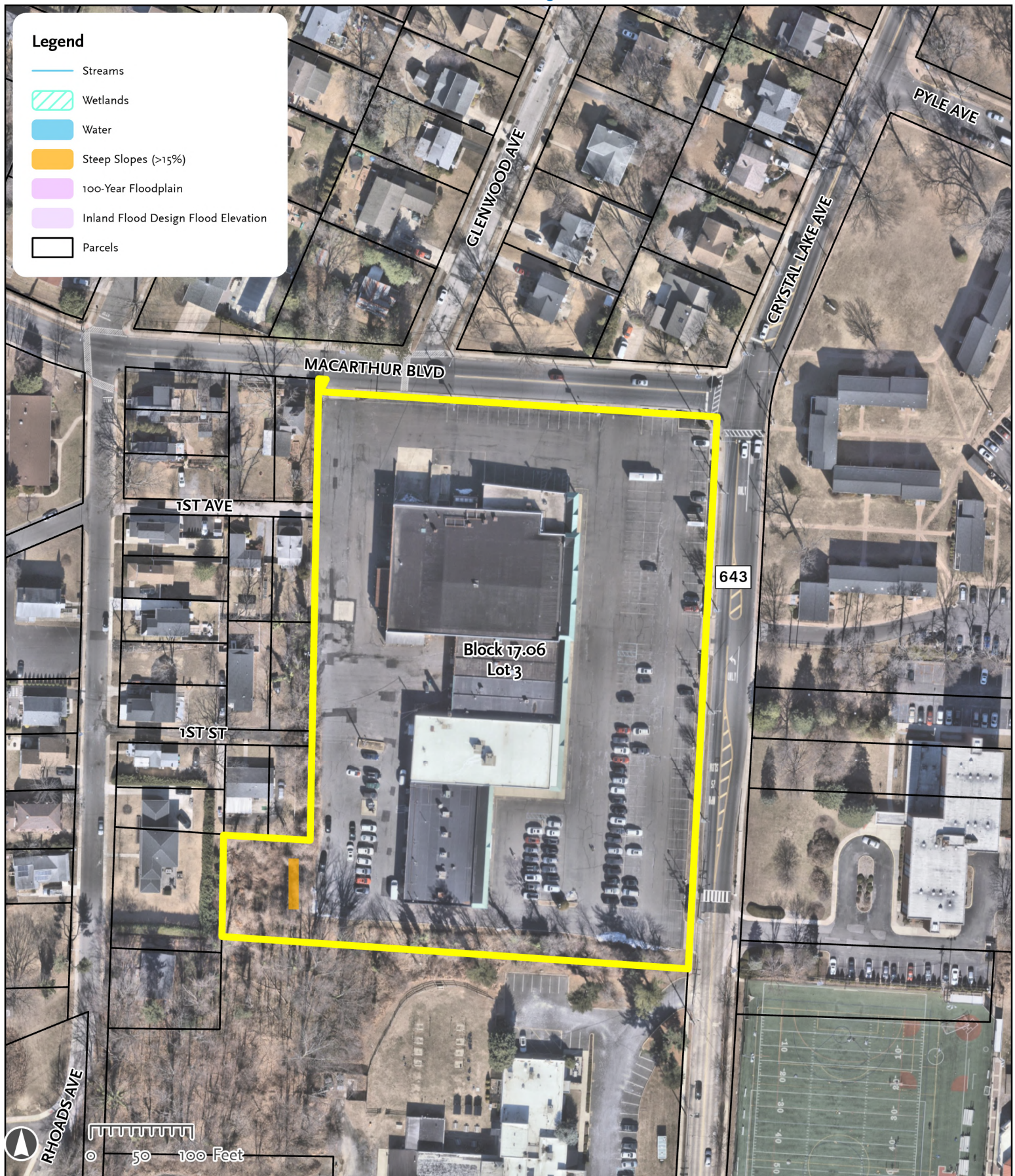
Coles Landing is a 57-unit affordable senior rental development that was completed in 1998 at 555 Coles Mill Road (Block 23.02, Lot 1). The project was financed through the HUD 202 Program with a 50-year PILOT. The development was issued a CO on July 21, 1999, and has 40-year affordability controls that began on November 30, 1998, and extend through November 30, 2038. All 57 units are one-bedroom units that are reserved for low-income households. The affordable units are administered by National Church Residences. The Township is claiming 49 of the 57 total units, the maximum number of Third Round senior credits permitted. (Supporting documentation is provided in Appendix G)

*Inclusionary Development (Completed)*

*Haddon Towne Center (formerly Fieldstone) – 15 of 25 units*

See Prior Round description. The Township is allocating a total of 30 credits toward its Third Round Prospective Need, including the 15-unit balance of the 25 total affordable units and 15 Third Round rental bonuses. The Haddon Towne Center family affordable rental units have controls of ‘at least’ 30 years which extend through and beyond the Third Round.





Clarke Caton Hintz



Architecture

Planning

Landscape Architecture

## FOURTH ROUND HOUSING ELEMENT AND FAIR SHARE PLAN

## Site Suitability Analysis: Old Thriftway/Crystal Lake

LOCATION:  
Haddon Township, Camden County, NJ

DATE:  
May 2025

## SOURCES:

Aerial Imagery: Nearmap (October 17, 2024)  
Streams: National Hydrography Dataset (NJDEP, 2015)  
Water/Wetlands: Land Use Land Cover (NJDEP, 2020)  
100-Year Floodplain: Effective FIRM (FEMA, 2019)  
Inland Flood: FEMA 1% Chance Annual Flood Plus 3 Feet (Rutgers/NJAdapt, 2024)  
Steep Slopes: New Jersey DEM (NJOGIS, 2019)  
Parcels: NJ MOD-IV (NJOGIS, 2024)



*Inclusionary Redevelopment (Proposed)*

*Old Thriftway/Crystal Lake Redevelopment (Proposed)*

The Old Thriftway/Crystal Lake site consists of approximately 4.53 developed acres located at 413 West Crystal Lake Avenue on the corner of MacArthur Boulevard (Block 17.06, Lot 3). The site contains an aging strip mall that lost its anchor tenant, Thriftway, in 2013. Several other stores are also vacant. The site is currently zoned C-2 Shopping Center Commercial, which prohibits residential uses.

Per the preliminary May 2025 Third Round Amended FSHC Settlement Agreement, the Township agrees to rezone the site as planned through the statutory redevelopment process established by the NJ Local Redevelopment and Housing Law (“LRHL”) at N.J.S.A. 40A:12A-1 *et seq.* to permit a total of 161 total housing units with a 15% set-aside of 25 affordable family rental units.

Pursuant to the terms of the preliminary 2025 Amended Agreement with FSHC, the Township previously designated the site as an area in need of redevelopment (“AINR”), will enter into a redevelopment agreement with the Redeveloper (ILCL Center Associates, LP) and will adopt a redevelopment plan pursuant to the LRHL. The redevelopment plan will permit the existing uses to continue as conforming uses and permit inclusionary development containing up to a total of 161 residential units at a density of 35.5 units with a 15% set-aside for 25 affordable family rental units.

The site meets the suitability criteria found in N.J.A.C. 5:93-5.3(b) as follows:

- Available – The property owner, ILCL Center Associates LP, has development rights of the property and intends to develop the site in accordance with the provisions of the preliminary Amended FSHC Settlement Agreement. The property owner has provided a letter of commitment to develop the site in accordance with these provisions, which will also be included in the redevelopment agreement for the site (see Appendix H).
- Suitable – The site has frontage on West Crystal Lake Avenue (County Route 643) and MacArthur Boulevard. The property is currently developed with a one-story shopping mall and associated parking lot and an estimated lot coverage of over 90%. The site fronts existing multi-family residential developments across West Crystal Lake Avenue: the Haddon Hills Apartments complex, which contains 432 garden apartments on 27.92 acres for a density of 15.5 units per acre, and the Rohrer Towers II apartment complex, which is an eight-story building that contains 100 affordable senior units on approximately 1.93 acres for a density of 51.8 units per acre. The site is within a quarter-mile walking distance of Van Sciver Elementary School, William G. Rohrer Middle School, and active and passive recreation facilities. An existing NJ Transit bus stop is located on the property line fronting MacArthur Boulevard. The site is one half mile south of the Westmont PATCO station, which provides rail service

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between Lindenwold and Philadelphia and other major transit connections. Per the SDRP, the site is located in the Metropolitan Planning Area (Planning Area 1), where redevelopment is encouraged and affordable housing is preferred.

- **Developable** – The property is within the Township’s sanitary sewer service area and currently has water and sewer service. The Township Engineer has provided a letter dated May 19, 2025, indicating there is sufficient water supply and conveyance capacity to serve the proposed units, and sufficient conveyance capacity for the anticipated sewer flows.
- **Approvable** – According to the latest data from NJDEP and FEMA, no wetlands, flood hazard areas, Category One streams or riparian zones are present on the site. The property is not on the NJDEP Known Contaminated Sites List. The developer will need all customary approvals from outside agencies, including Camden County approval for stormwater management and access from West Crystal Lake Avenue (County Route 643).
- **Administrative Entity** – The Township’s experienced Administrative Agent, Triad, will work with the developer of the site to ensure that the affordable units are affirmatively marketed and meet other UHAC regulations pertaining to the affordable units.

The income/bedroom distribution of proposed affordable units is summarized in Table 31. All affordable units will have UHAC-consistent affordability controls.

**Table 31. Income/Bedroom Distribution, Old Thriftway/Crystal Lake**

<b>Income Distribution</b>	<b>Bedroom Distribution</b>			<b>Total</b>
	<b>1BR / Efficiency</b>	<b>2BR</b>	<b>3BR</b>	
Very Low-Income	1	2	1	<b>4 (16%)</b>
Low-Income	1	6	2	<b>9 (36%)</b>
Moderate-Income	3	7	2	<b>12 (48%)</b>
<b>Total</b>	<b>5 (20%)</b>	<b>15 (60%)</b>	<b>5 (20%)</b>	<b>25 (100%)</b>

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*Wells Fargo/600 Cuthbert Redevelopment (Proposed)*

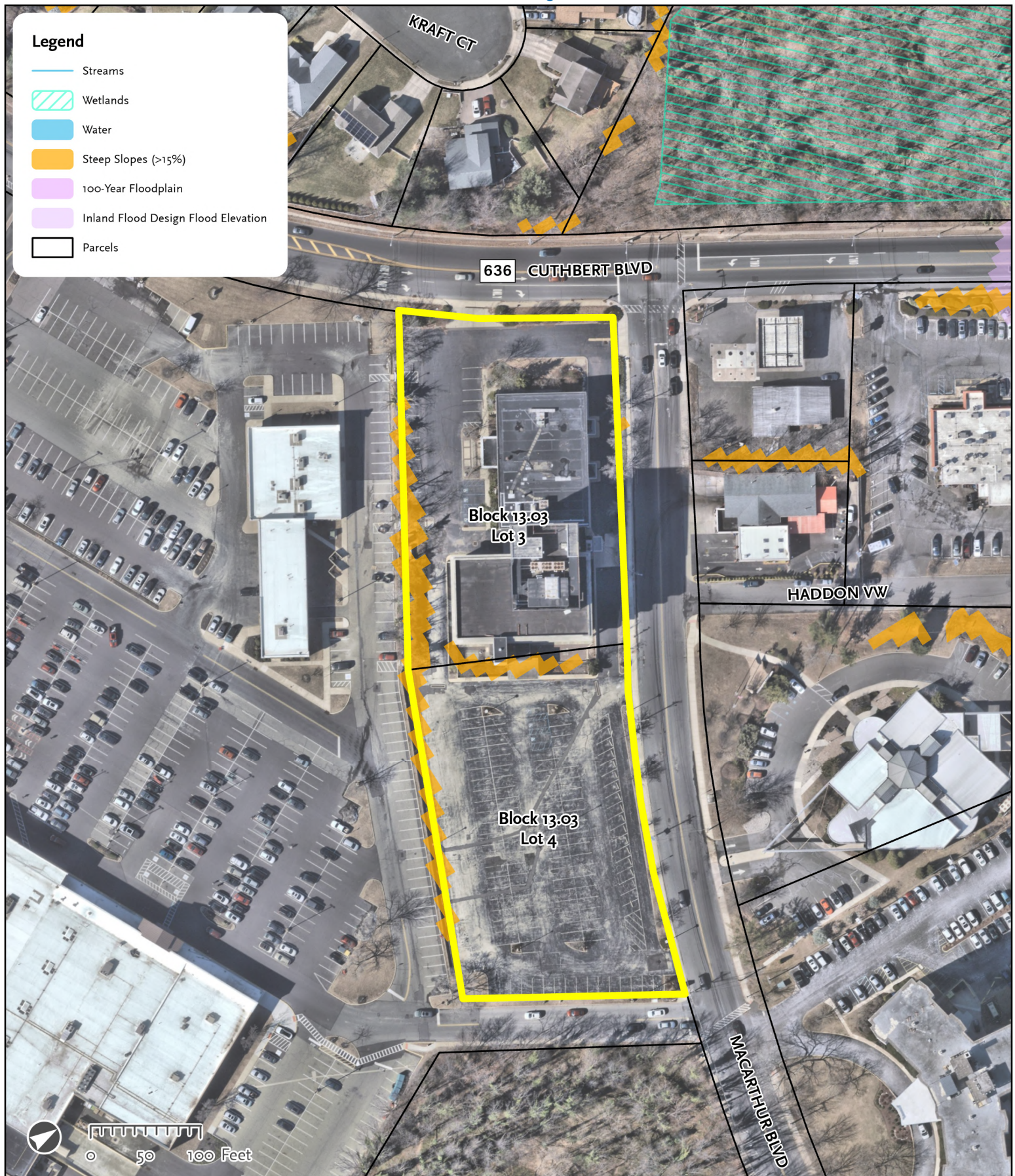
The Wells Fargo/600 Cuthbert redevelopment site consists of approximately 2.75 developed acres located at 600 W Cuthbert Boulevard (Block 13.03, Lots 3 and 4) on the corner of MacArthur Boulevard. The site contains a six-story commercial office building and parking lot. The site is currently zoned C-2 Shopping Center Commercial, which prohibits residential uses.

Pursuant to the terms of the May 2025 Amended Settlement Agreement with FSHC, the Township will designate the site as an area in need of redevelopment (“AINR”) and adopt a redevelopment plan pursuant to the redevelopment process established by the NJ Local Redevelopment and Housing Law (“LRHL”) at N.J.S.A. 40A:12A-1 *et seq.* The redevelopment plan will permit the existing uses to continue as conforming uses permit inclusionary development containing a total of 180 to 240 total housing units with a 15% set-aside for 27 to 36 affordable family rental units.

The site meets the suitability criteria found in N.J.A.C. 5:93-5.3(b) as follows:

- Available – The site is owned by a redeveloper (600 Cuthbert, LLC) who intends to redevelop the site. The owner has provided a commitment letter indicating the intent to develop the site in accordance with the terms of the 2025 Amended Settlement Agreement (Appendix I).
- Suitable – The site has frontage on both Cuthbert Boulevard (County Route 636) and MacArthur Boulevard. The site is currently developed with a six-story building and an estimated lot coverage of over 90%. The site is adjacent to a variety of commercial retail uses in the Westmont Plaza shopping center to the south, adjacent to the Camden County Branch Library to the north, and across the street from the 12-story, 3-building Haddonview Apartments complex. Two (2) existing NJ Transit bus stops are located on opposite sides of the property on Cuthbert Boulevard and MacArthur Boulevard. The site is also located within one (1) mile of the Westmont PATCO station, which provides rail service between Lindenwold and Philadelphia and other major transit connections. Per the State Development and Redevelopment Plan, the site is located in the Metropolitan Planning Area (Planning Area 1), where redevelopment is encouraged and affordable housing is preferred.
- Developable – The property is within the Township’s sanitary sewer service area, and currently has both water and sewer service. The Township Engineer has provided a letter dated May 19, 2025, indicating there is sufficient water supply and conveyance capacity to serve the proposed units, and sufficient conveyance capacity for the anticipated sewer flows.





Clarke Caton Hintz



Architecture

Planning

Landscape Architecture

## FOURTH ROUND HOUSING ELEMENT AND FAIR SHARE PLAN

## Site Suitability Analysis: Wells Fargo/600 Cuthbert

LOCATION:  
Haddon Township, Camden County, NJ

DATE:  
May 2025

## SOURCES:

Aerial Imagery: Nearmap (October 17, 2024)  
Streams: National Hydrography Dataset (NJDEP, 2015)  
Water/Wetlands: Land Use Land Cover (NJDEP, 2020)  
100-Year Floodplain: Effective FIRM (FEMA, 2019)  
Inland Flood: FEMA 1% Chance Annual Flood Plus 3 Feet (Rutgers/NJAdapt, 2024)  
Steep Slopes: New Jersey DEM (NJOGIS, 2019)  
Parcels: NJ MOD-IV (NJOGIS, 2024)



- **Approvable** – According to the latest data from NJDEP and FEMA, no wetlands, flood hazard areas, Category One streams or riparian zones are present on the site. The site is not on the NJDEP Known Contaminated Sites List. The developer will need all customary approvals from outside agencies, including Camden County approval of stormwater management and access from West Cuthbert Boulevard (County Route 636).
- **Administrative Entity** – The Township’s experienced Administrative Agent, Triad, will work with the developer of the site to ensure that the affordable units are affirmatively marketed and meet other UHAC regulations pertaining to the affordable units.

### **Addressing Fourth Round Prospective Need (RDP and Unmet Need)**

By order dated March 28, 2025, the Court affirmed the Township’s Fourth Round Prospective Need of 69. At this time, the Township is virtually fully developed and additional opportunities for affordable housing production will come from both formal and informal redevelopment activity. This can clearly be seen with the two (2) Third Round Redevelopment sites that will repurpose formerly active non-residential sites including a shopping center and a bank/office building into inclusionary residential/mixed-use developments. Thus, for its Fourth Round Prospective Need, the Township has proposed a vacant land adjustment which will adjust the 69 Prospective Need to a realistic development potential (“RDP”) of 5 and an Unmet Need of 64.

As noted earlier, the Township has prepared an analysis of its vacant and developable land (known as a “vacant land analysis” or “VLA”), based on the procedures set forth at N.J.A.C. 5:93-4.2, which were upheld by the Amended FHA, P.L. 2024, c.2, to determine its RDP for the Fourth Round (Appendix C). Sites that were determined to generate a Fourth Round RDP are summarized in Table 32. It’s important to note that COAH’s court-upheld VLA regulations don’t require a municipality to incorporate sites that generate an RDP into its HEFSP, it may choose to do so but it is not required to do so.



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**Table 32. Sites Generating Fourth Round RDP**

Site	Block/Lot	Address	Net Area (ac.)	Density (du/ac.)	Total Units	RDP @ 20%
Collings and Eldridge Ave	1.06/1 1.06/14 1.06/15	Collings Ave, 1503 Eldridge Ave, 1301 Eldridge Ave	0.46	14	6.4	1.3
Fmr. Newton Diner Site	8.10/26	931 White Horse Pike	0.72	16	11.5	2.3
59-61 Haddon Ave	21.11/3 21.11/6 21.11/7	69 Haddon Ave 1-3 Cooper Street	0.38	18	6.8	1.4
<b>Total</b>						<b>5</b>

**Addressing Fourth Round RDP**

Based on the Fourth Round RDP of 5. The 2024 amended FHA establishes minimum and maximum requirements for the Fourth Round pursuant to the following formulas:

$$\begin{aligned}\text{Minimum Rental Unit Obligation} &= 1 \\ &= 0.25(\text{Fourth Round Units}) = 0.25(4) = 1\end{aligned}$$

$$\begin{aligned}\text{Minimum Family Rental Unit Obligation} &= 1 \\ &= 0.50(\text{Fourth Round Rental Obligation}) = 0.50(1) = 0.5, \text{ rounded up}\end{aligned}$$

$$\begin{aligned}\text{Minimum Family Unit Obligation} &= 2 \\ &= 0.50 (\text{Fourth Round Units}) = 0.50(4) = 2\end{aligned}$$

$$\begin{aligned}\text{Maximum Senior Unit Obligation} &= 1 \\ &= 0.30(\text{Fourth Round Units}) = 0.30(4) = 1.2, \text{ rounded down}\end{aligned}$$

$$\begin{aligned}\text{Minimum Low-Income Unit Obligation} &= 4 \\ &= 0.50 (\text{Fourth Round Units}) = 0.50 (4) = 2\end{aligned}$$

See the discussion below under ‘Very Low-Income Units’ regarding the Township’s means to address its overall very low-income requirements as well as the amended FHA’s Fourth Round requirement to provide very low-income units ‘available for families with children.’

As summarized in Table 33, the Township will fully address its Fourth Round RDP of 5 through one (1) surplus affordable senior rental at Coles Landing that was not credited

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toward the Third Round Prospective Need, three (3) market to affordable family rental units, and one (1) Fourth Round bonus.

**Table 33. Fourth Round Credit Summary (2025-2035)**

<b>Haddon Township Fourth Round Compliance Mechanisms (RDP = 5)</b>	<b>Credits</b>	<b>Bonuses</b>	<b>Total</b>
Coles Landing – afford senior rental (1 of 8 bal., of 57, capped)	1	-	1
Proposed Market-to-Affordable Program – afford family rentals	3	1, cap	4
<b>Total</b>	<b>4</b>	<b>1</b>	<b>5</b>

*Coles Landing (1 of 8 balance, of 57 total senior rental units)*

See Third Round description where 49 of the 57 total senior affordable rental units at Coles Landing addressed the Third Round fair share, leaving a balance of 8 surplus senior affordable rental credits. The Township shall apply one (1) surplus affordable senior rental unit at Cole's Landing to address its Fourth Round RDP. The development has 40-year affordability controls that extend through and beyond the Fourth Round. All 57 units are one-bedroom units that are reserved for low-income households.

*Proposed Market-to-Affordable Program (3 units)*

To address a portion of the Township's Fourth Round RDP, the Township proposes to create three (3) affordable units through a market to affordable program. As defined in N.J.A.C. 5:97, a market to affordable program means "a program to pay down the cost of market-rate units and offer them in sound condition, for sale or rent, at affordable prices to low- and moderate-income households to address all or a portion of the fair share obligation." Pursuant to N.J.A.C. 5:97-6.9, a market to affordable program shall include units purchased or subsidized through a written agreement with the property owner and sold or rented to low- and moderate-income households. Haddon Township will provide no less than the minimum required subsidy of \$25,000 per moderate-income unit and \$30,000 per low-income unit as specified in the Township's Fourth Round Spending Plan and exclusive of any rehabilitation costs that may be anticipated.

Until any future Fifth Round update, the three (3) market to affordable units addressing the Township's Fourth Round RDP of 5 shall be two- or three-bedroom units and shall not be age-restricted. As discussed further in this HEFSP, one (1) of the market to affordable units will be a very low-income unit to help address the Township's cumulative 13% very low-income unit obligation and to specifically address the amended FHA's Fourth Round very low-income requirements to provide very low-income units 'available for families with children.'

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The proposed Market to Affordable Program will be administered and operated by, Triad, the Township's experienced Administrative Agent, who will prepare an operating manual in accordance with requirements at N.J.A.C. 5:97-6.9. The program will be included in the Township's Affirmative Marketing Plan.

**Table 34. Income/Bedroom Distribution, Market to Affordable Program**

Income Distribution	Bedroom Distribution			Total
	1BR / Efficiency	2BR	3BR	
Very Low-Income	-	1	-	1 (33.3%)
Low-Income	-	-	1	1 (33.3%)
Moderate-Income	-	1	-	1 (33.3%)
<b>Total</b>	<b>0 (0%)</b>	<b>2 (66.6%)</b>	<b>1 (33.3%)</b>	<b>3 (100%)</b>

**Addressing Fourth Round Unmet Need**

For potential opportunities to address the Township's Fourth Round Unmet Need of 64, the Township has followed the court-upheld COAH regulations regarding VLAs. Per N.J.A.C. 5:93-4.2(h), COAH "may require at least any combination of the following in an effort to address Unmet Need:

- Zoning amendments that permit apartments or accessory apartments;
- Overlay zoning requiring inclusionary development or the imposition of a development fee consistent with N.J.A.C.5:93-8. In approving an overlay zone, the Council [Program/Court] may allow the existing use to continue and expand as a conforming use, but provide that where the prior use on the site is changed, the site shall produce low- and moderate-income housing or a development fee; or
- Zoning amendments that impose a development fee consistent with N.J.A.C.5:93-8."

The Township has a number of compliance measures to assist in addressing its Fourth Round Unmet Need obligation, including through the proposed Haddon Avenue Inclusionary Overlay Zone, the proposed Mandatory Affordable Housing Set-Aside Ordinance, and the Township's adopted Development Fee Ordinance.

Pursuant to the amended FHA at N.J.S.A. 52:27D-310.1, the Township must identify land that is likely to redevelop during the Fourth Round to address at least 25% of the Fourth Round Unmet Need of 64 through realistic zoning or demonstrate why it is

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unable to do so. This Fourth Round Unmet Need calculation would require 16 potential affordable units that may redevelop over time in the Township  $[64 \text{ Fourth Round Unmet Need} \times 25\% \text{ overlay zoning requirement} = 16]$ .

The Township is able to address the 25% minimum Fourth Round Unmet Need obligation through the proposed Haddon Avenue Inclusionary Overlay Zone that may potentially provide up to 62 affordable units through redevelopment based on a total area of 15.5 acres within the overlay zone, an average density of 20 dwelling units per acre, and a required affordable housing set-aside of twenty percent (20%)  $[15.5 \text{ total acres} \times 20 \text{ du/ac} = 310 \text{ dwelling units} \times 20\% = 62 \text{ affordable units}]$ .

To more quickly react to additional potential redevelopment opportunities, the Township shall adopt a Mandatory Township-wide Affordable Housing Set-aside Ordinance. Due to the Township's limited availability of undeveloped land, additional opportunities for affordable housing production will come from both formal and informal redevelopment activity. As discussed below, the proposed Mandatory Affordable Housing Set-Aside Ordinance, proposed Haddon Avenue Inclusionary Overlay Zone Ordinance, adopted Development Fee Ordinance, and future redevelopment sites will create opportunities to produce affordable housing through the Fourth Round and beyond to address the balance of the Township's Third Round fair share, Fourth Round Unmet Need, and future affordable housing obligations.

*Haddon Avenue Inclusionary Affordable Housing Overlay Zone (Adopted)*

To address its Fourth Round Unmet Need, Haddon Township will create opportunities for potential future development of affordable housing through the adoption of mixed-use inclusionary overlay zoning along Haddon Avenue near Crystal Lake Avenue, as shown in the following map. The Haddon Avenue Overlay Zone is along the south side of Haddon Avenue on either side of Crystal Lake Ave including the Sentry office building and extending beyond Carlton Avenue. The zone will consist of three (3) affordable housing overlay (AHO) districts: AHO-1, AHO-2, and AHO-3.

Existing uses within the overlay zone include surface parking lots, commercial properties on Haddon Avenue, and residential properties on Glenwood Avenue and Carlton Avenue. Underlying zoning districts include the R-1 Single-Family Residential on parcels south of the PATCO line C-4 Office & Business zoning north of the PATCO line fronting Haddon Avenue. The proposed overlay zone requires commercial uses on the first floor and permits residential uses on the second floor and above. Any net new residential development will be required to provide a 20% set-aside for affordable housing, whether rental or for-sale housing. Fractional affordable units are required to round up to provide the affordable housing unit(s) generated by the set-aside requirement. On May 1, 2025, the Planning Board adopted Resolution #2025-PB-01 (Appendix J) recommending Ordinance #1476 to the Township governing body after finding the ordinance to be consistent with the Township's Master Plan.