

Housing Element and Fair Share Plan

Fourth Round

STRATFORD BOROUGH, CAMDEN COUNTY, NJ

JUNE 2025

Adopted by the Stratford Borough Joint Land Use Board on June 26, 2025 by Resolution 2025:09.

Endorsed by Stratford Borough Council on June 27, 2025.

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2025 Stratford Borough Council

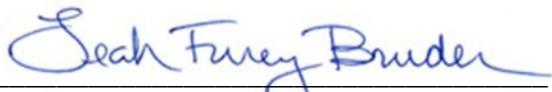
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I. Introduction and Executive Summary

This Fourth Round Housing Element and Fair Share Plan (“HEFSP”) has been prepared for Stratford Borough in accordance with the New Jersey Fair Housing Act (“FHA”) and the applicable rules of the New Jersey Council on Affordable Housing (“COAH”) at N.J.A.C. 5:93 et seq. There are four components of a municipality’s affordable housing obligation under the regulatory scheme that has evolved since the *Mount Laurel I* and *Mount Laurel II* decisions. Beginning with the First Round of affordable housing in 1987, municipalities wishing to proactively plan to accommodate opportunities for affordable housing may opt to participate in the fair share planning process. The four elements of the obligation are: the Fourth Round Present Need (Rehabilitation Share), the Prior Round Prospective Need (Cumulative First and Second Round), the Third Round Gap and Prospective Need, and the Fourth Round Prospective Need. Since 1970 when Stratford’s population peaked, the Borough has been simultaneously pursuing conservation and maintenance of residential neighborhoods, redevelopment and revitalization of the commercial areas, and the provision of services to meet evolving demands. The Borough formally entered the affordable housing planning process during the Third Round in 2005.

Stratford Borough Fair Share Obligation	
Fourth Round Present Need /Rehabilitation Obligation	10
Prior Round Prospective Need	70
Third Round Gap and Prospective Need	59 ¹
Fourth Round Prospective Need	25

The Borough applied for and was granted a vacant land adjustment in the Third Round, with a Realistic Development Potential (RDP) of 22 units established in the Third Round Settlement Agreement. The Borough has fully satisfied the RDP of 22 with inclusionary zoning on Block 62 Lot 8. The RDP compliance is detailed in Section IV.C(1).

The Third Round Settlement Agreement established that the Borough would create opportunities for 55 affordable units to partially satisfy the unmet need. The Borough continues to support the production of affordable housing on the identified unmet need sites and has also captured affordable housing opportunities on other sites that had not been identified at the time the Third Round Settlement was reached. Unmet need is being met with inclusionary redevelopment at

¹ Following Judge Jacobson’s 2018 decision In the Matter of the Application of the Municipality of Princeton, L-1550-15 (directly involving West Windsor and Princeton), Econsult Solutions Inc. used the workbooks from the decision to extrapolate Third Round obligations for all municipalities in the State. For Stratford this Third Round number is 59. In 2016 when Stratford entered into a Third Round Settlement Agreement with Fair Share Housing Center, the settlement established the Third Round prospective as 91. The Third Round number from the Jacobson decision is a 32-unit reduction from 91. Since Stratford is a built-out municipality entitled to a vacant land adjustment, the reduction does not “change” the Borough’s Fair Share Plan, as the 32 unit difference is part of the “unmet need”. However, the Borough proposes to utilize the “Jacobson number” as the Third Round obligation.

Laurel Mills site (12 units²), the former Bradlees site (43 Units), the Berlin Road Redevelopment site (8 units), Supportive Housing at One Colby Avenue (20 units), and the Christian Academy Redevelopment (8 senior units). The Third Round unmet need compliance is detailed in section IV.C(2).

The Borough is requesting a continuation of the vacant land adjustment for the Fourth Round, and in accordance with N.J.S.A. 52:27D-310.1, must identify sufficient parcels likely to redevelop during the current round of obligations to address at least 25 percent of the prospective need obligation. The Borough will satisfy 25% (7 units) of the fourth round prospective need with inclusionary redevelopment along the west side of East Laurel Road (between S Atlantic Ave and Kirkwood Ave). The proposals are detailed in section IV.D.

II. *Mount Laurel* Affordable Housing Background

A. Judicial Background

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

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

² The Third Round settlement had anticipated 12 units, but the site plan and subdivision approval includes 16 affordable units.

For the Third Round, which should have begun in 1999, COAH adopted regulations in 2004 intended to cover a ten-year period through 2014. In 2007 the first iteration of the Third Round rules were invalidated by a New Jersey Appellate Court decision, and COAH was ordered to propose amendments to its rules. The second iteration of the Third Round rules were adopted in June and October of 2008. The rules were again challenged and ultimately invalidated by the Court in 2010. After being ordered by the NJ Supreme Court to do so, COAH then attempted to adopt a third set of Third Round regulations in 2014, but failed, resulting in additional challenges. These challenges lead to the Supreme Court’s decision *In re Adoption of N.J.A.C. 5:96 & 5:97 by the N.J. Council on Affordable Housing*, 221 N.J. 1 (2015) (“*Mount Laurel IV*”), in which it held that since COAH was no longer functioning, trial courts were to resume their role as the form of first instance for evaluating municipal compliance with *Mount Laurel* obligations, and also established a transitional process for municipalities to seek a Judgment of Compliance and Repose (“JOR”) in lieu of Substantive Certification from COAH.

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

In 2017 the New Jersey Supreme Court determined that the “lost” period of time between 1999 and 2015 when no valid affordable housing regulations were in force, still generated an affordable housing obligation to address housing needs that continued to accrue during that time.³ This time period became known as the “gap period” and is now a component of the Third Round obligation.

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

B. Legislative Background

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

³ The Third Round gap present need is a measure of low- and moderate-income households that formed from 1999 and 2015 and that were still in need of housing in 2015.

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

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

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

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

- Provides for a minimum of 40 year control period for new affordable rental units;
- Modifies the criteria for affordable housing bonuses that may be claimed in municipal fair share plans.
- Establishes a specific timeline for the steps needed to establish municipal affordable housing obligations, to challenge the determinations, and to adopt a Housing Element and Fair Share Plan, in order for them to retain their immunity from exclusionary zoning litigation.
- Establishes new reporting and monitoring procedures and deadlines for both affordable units and affordable housing trust funds and assigns oversight for reporting and monitoring to DCA.

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

C. Stratford Borough Affordable Housing History

Stratford Borough began its voluntary participation in the affordable housing planning process in 2005 with the adoption of a Housing Element and Fair Share Plan that responded to the Council on Affordable Housing's (COAH) first iteration of the Third Round affordable housing rules. The plan was filed with COAH in December of 2005. As part of this planning and implementation process, the Borough adopted a "Growth Share" affordable housing ordinance and a mandatory development fee ordinance. Stratford adopted an amended Housing Element and Fair Share Plan in November 2008 in response to the second iteration of the Third Round rules and petitioned for substantive certification on December 31, 2008. The Borough adopted updated affordable housing and development fee ordinances and responded to COAH's requests for additional information. However, the second iteration of the Third Round rules were invalidated in October of 2010.

Following the March 10, 2015 NJ Supreme Court decision (*Mount Laurel IV*), the Borough filed a declaratory judgement complaint and submitted itself to the new judicial process (on July 7, 2015). On November 9, 2016, Stratford Borough entered into a Third Round Settlement Agreement with Fair Share Housing Center which set the Third Round prospective need fair share obligation, accepted the Borough's vacant land adjusted RDP of 22, and included an outline of proposed compliance mechanisms for the RDP and a portion of the unmet need.

The Borough has continued to implement the Third Round Fair Share Plan, and to refine and modify it to respond to new information and emerging opportunities, while affirming its commitment to fulfill the 22 unit RDP and 55 unit unmet need obligation that it committed to. The Borough has now prepared this Fourth Round Housing Element and Fair Share Plan to ensure

realistic opportunities for the production of additional affordable housing in areas where redevelopment is likely and in areas suited to accommodate new housing.

D. Timelines

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

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

Stratford Borough adopted Resolution 25:25 on January 9, 2025.

The Declaratory Judgement Complaint was filed with the program on January 10, 2025, Docket CAM-L-000101-25.

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

Stratford accepted the DCA’s calculations and no challenges were filed.

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

On March 28, 2025, by Order of Judge Schweitzer, the municipal fourth round prospective need obligation was fixed at 25 and the present need was fixed at 10.

4. June 30, 2025. Municipalities are required to adopt a housing element and fair share plan and propose drafts of the appropriate zoning and other ordinances and resolutions to implement its present and prospective obligation by June 30, 2025, and file it with the Program.

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

E. Housing Element Requirements

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

- a. An inventory of the municipality's housing stock by age, condition, purchase or rental value, occupancy characteristics, and type, including the number of units affordable to low- and moderate-income households and substandard housing capable of being rehabilitated, and in conducting this inventory the municipality shall have access, on a confidential basis for the sole purpose of conducting the inventory, to all necessary property tax assessment records and information in the assessor's office, including but not limited to the property record cards;
- b. A projection of the municipality's housing stock, including the probable future construction of low- and moderate-income housing, for the next ten years, taking into account, but not necessarily limited to, construction permits issued, approvals of applications for development and probable residential development of lands;
- c. An analysis of the municipality's demographic characteristics, including but not necessarily limited to, household size, income level and age;
- d. An analysis of the existing and probable future employment characteristics of the municipality;
- e. A determination of the municipality's present and prospective fair share for low- and moderate-income housing and its capacity to accommodate its present and prospective housing needs, including its fair share for low- and moderate-income housing, as established pursuant to section 3 of P.L.2024, c.2 (C.52:27D-304.1);
- f. A consideration of the lands that are most appropriate for construction of low- and moderate-income housing and of the existing structures most appropriate for conversion

to, or rehabilitation for, low- and moderate-income housing, including a consideration of lands of developers who have expressed a commitment to provide low- and moderate-income housing;

- g. An analysis of the extent to which municipal ordinances and other local factors advance or detract from the goal of preserving multigenerational family continuity as expressed in the recommendations of the Multigenerational Family Housing Continuity Commission, adopted pursuant to paragraph (1) of subsection f. of section 1 of P.L.2021, c.273 (C.52:27D-329.20);
- h. For a municipality located within the jurisdiction of the Highlands Water Protection and Planning Council, established pursuant to section 4 of P.L.2004, c.120 (C.13:20-4), an analysis of compliance of the housing element with the Highlands Regional Master Plan of lands in the Highlands Preservation Area, and lands in the Highlands Planning Area for Highlands-conforming municipalities. This analysis shall include consideration of the municipality's most recent Highlands Municipal Build Out Report, consideration of opportunities for redevelopment of existing developed lands into inclusionary or 100 percent affordable housing, or both, and opportunities for 100 percent affordable housing in both the Highlands Planning Area and Highlands Preservation Area that are consistent with the Highlands regional master plan; and
- i. An analysis of consistency with the State Development and Redevelopment Plan, including water, wastewater, stormwater, and multi-modal transportation based on guidance and technical assistance from the State Planning Commission.

F. Directive #14-24 Requirements

The March 20, 2024 amendments to the Fair Housing Act (P.L. 2024 c.2) established the Affordable Housing Alternate Dispute Resolution Program (the "Program") within the Judiciary that is responsible for reviewing challenges to municipal fair share determinations and municipal compliance efforts. Administrative Directive #14-24 was issued to promulgate procedures and guidelines for implementing the Program. The Directive includes an Addendum outlining the elements to be included in the Housing Element and Fair Share Plan. These elements are outlined below.⁴

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

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

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

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

III. Housing Element Analysis

A. Demographic Characteristics

1. Population

The changes in population in Stratford Borough, Camden County and the State of New Jersey from 1930 through 2024 are shown in Table 1. The population in 1930 was 13% of today’s population. While some homes in Stratford date to the early 1800s, the development of the town as a bedroom community began in the 1890s with the location of a railroad station and a grid pattern neighborhood plan in the area known as Olde Stratford between the White Horse Pike and East Atlantic Avenue, north of Laurel Road. The town’s population exploded between 1950 and 1970 during the post-World War II suburban boom. Stratford’s population peaked in 1970 with 9,801 residents. From 1970 to 2020, the population declined, reaching a low of 6,981 in 2020. Since then the population has increased nominally to 7,185. The recent increase in population is likely the result of housing turnover during the covid pandemic, with more families moving into single family homes, as well as the addition of 49 townhomes on Berlin Road.

**Table 1
Population Trends**

Year	Stratford Borough			Camden County			New Jersey		
	Population	Change since last Census		Population	Change since last Census		Population	Change since last Census	
		Number	Percentage		Number	Percentage		Number	Percentage
1930	958	--	--	93,541	-	-	4,041,334	-	-
1940	980	22	2.3%	97,013	3,472	3.7%	4,160,165	118,831	2.9%
1950	1,356	376	38.4%	135,910	38,897	40.1%	4,835,329	675,164	16.2%
1960	4,308	2,952	217.7%	224,499	88,589	65.2%	6,066,782	1,231,453	25.5%
1970	9,801	5,493	184.9%	323,132	98,633	43.9%	7,168,164	1,101,382	18.2%
1980	8,005	-1,796	-22.4%	362,542	39,410	12.2%	7,364,823	196,659	2.7%
1990	7,614	-391	-5.1%	395,066	32,524	9.0%	7,730,188	365,365	5.0%
2000	7,271	-343	-4.7%	423,394	28,328	7.2%	8,414,350	684,162	8.9%
2010	7,040	-231	-3.3%	448,734	25,340	6.0%	8,791,894	377,544	4.5%
2020	6,981	-59	-0.8%	461,860	13,126	2.9%	9,288,994	497,100	5.7%
2024*	7,185	204	2.9%	475,515	13,655	3.0%	9,500,851	211,857	2.3%

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

2. Population Composition by Age

According to the 2023 American Community Survey 5-year estimates, the median age of the residents of Stratford in 2023 was 36.2 years. Analysis of age group characteristics provides insight into the demographic shifts and trends in a municipality. Changes in age group data reflect a number of demographic trends, which can be helpful in considering how the changes impact housing, community facilities and services needs for the municipality and the County overall. Between 2000 and 2020 the age composition of Stratford has fluctuated among each age cohort. While the population overall remained generally steady over the 20 year period, the number of children under the age of 14 has decreased by 20%. The number of adults aged 55 to 64 has increased by 60.2%. This is reflective of the overall aging of the residential population. Over time, housing turnover will likely bring a new wave of younger families.

Population	2000		2020		Change, 2000 to 2020	
	Number	Percentage	Number	Percentage	Number	Percentage
Total population	7,271	100%	6,981	100%	-290	-4.2%
Under 5 years	447	6.1%	377	5.4%	-70	-18.6%
5 to 14	1,041	14.3%	805	11.5%	-236	-29.3%
15 to 24	895	12.3%	827	11.8%	-68	-19.1%
25 to 34	913	12.6%	971	13.9%	58	6.4%
35 to 44	1,255	17.3%	874	12.5%	-381	-43.6%
45 to 54	917	12.6%	912	13.1%	-5	-0.5%
55 to 64	653	9.0%	1,046	15.0%	393	60.2%
65 and over	1,150	15.8%	1,169	16.7%	19	1.7%

Source: US Census Bureau, Decennial Census

B. Housing Characteristics

There were 2,574 housing units in Stratford as of 2023. The Borough's housing stock consists primarily of single-family houses (70.2%), followed by a substantial number of multi-family units in buildings containing 10 units or more (21.6%). The Borough's renter population occupies approximately 27.1% of the housing units compared to 35% for the County overall.

Number of Units in Structure	Owner-Occupied		Renter-Occupied		Vacant		Total	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
1, Detached	1,680	65%	126	4.9%	0	0%	1,806	70.2%
1, Attached	72	2.8%	9	0.3%	0	0%	81	3.1%
2	10	0.4%	30	1.2%	0	0%	40	1.6%
3 or 4	13	0.5%	9	0.3%	0	0%	22	0.9%
5 to 9	19	0.7%	50	1.9%	0	0%	69	2.7%
10 or more	52	2.0%	474	18.4%	30	1.2%	556	21.6%
Other	0	0%	0	0%	0	0%	0	0%
Total	1,846	71.7%	698	27.1%	30	1.2%	2,574	100%

Source: US Census Bureau, 2019-2023 American Community Survey Five Year Estimates
Table B25024, Table B25032

The approximate age of Stratford's housing stock is shown in Table 4. The median year of construction of all housing units in the Borough is 1960, which is the same as Camden County overall (1960) and older than the State overall (1969). According to ACS survey results, zero housing units were built in Stratford after 2010. The 49 new units within the Berlin Road Redevelopment Area were constructed and occupied in 2023 and were not captured by this data. Eighty-four percent of the Borough's housing stock was constructed prior to 1970. Renter-occupied units in Stratford are generally newer than owner-occupied units, as apartment complexes were constructed after the initial wave of single-family residential development.

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%
2010 to 2019	0	0%	32	1.3%	0	0%	32	1.3%
2000 to 2009	6	0.2%	0	0%	0	0%	6	0.2%
1990 to 1999	38	1.5%	14	0.6%	0	0%	52	2.0%
1980 to 1989	6	0.2%	153	5.9%	0	0%	159	6.2%
1970 to 1979	85	3.3%	27	1.0%	30	1.2%	142	5.5%
1960 to 1969	623	24.2%	259	10.1%	0	0%	882	34.3%
1950 to 1959	757	29.4%	93	3.6%	0	0%	850	33.0%
1940 to 1949	209	8.2%	21	0.8%	0	0%	230	8.9%
1939 or earlier	122	4.7%	99	3.8%	0	0%	221	8.6%
Total	1,846	72.6%	698	27.1%	30	1.2%	2,574	100%
Median Year Built	1958		1965		(X)		1960	
Sources: Table B25034, Table B25036, and Table B25037 U.S. Census Bureau, 2019-2023 American Community Survey Five-Year Estimates								

As shown in Table 5, 27.4% of all housing units in Stratford contain four (4) bedrooms or more, compared to 24.6% in the County and 25.6% in the State overall. 42.7% of homes in Stratford have three bedrooms.

Bedrooms per Unit	Units	Percent
Efficiency	18	0.7%
1 Bedroom	437	17.0%
2 Bedrooms	314	13.2%
3 Bedrooms	1,100	42.7%
4 Bedrooms	577	22.4%
5+ Bedrooms	128	5.0%
Total	2,574	100%

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

Between 2013 and 2023, housing values for owner occupied units in Stratford increased by 19.2% (not accounting for inflation). The increase in residential real estate values is consistent with a substantial increase in demand for residential real estate outside of major metropolitan areas beginning during the covid pandemic. In 2013, 49.8% of all owner-occupied homes in the Borough were valued at \$200,000 or more; by 2023, that had grown to 67.2%. Approximately 72.6% of homeowners in Stratford have a mortgage or other debt on their property, while approximately 37.2% have no mortgage or debt on their property. This is consistent with the percentages of homeowners with and without mortgage debt in the County overall.

Housing Unit Value	2013		2023	
	Units	Percent	Units	Percent
Less than \$50,000	59	2.9%	42	2.3%
\$50,000 to \$99,999	29	1.4%	34	1.8%
\$100,000 to \$149,999	255	12.6%	201	18.9%
\$150,000 to \$199,999	672	33.2%	329	17.8%
\$200,000 to \$299,999	867	42.8%	1,005	54.4%
\$300,000 to \$499,999	122	6.0%	204	11.1%
\$500,000 to \$999,999	0	0%	20	1.1%
\$1,000,000 or more	20	1.0%	11	0.6%
Total	2,024	100%	1,846	100%
Median Value	\$199,800		\$238,200	

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

	Borough		Camden County	
	Number	Percentage	Number	Percentage
Housing units with a mortgage, contract to purchase, or similar debt:	1,160	62.8%	84,561	64.8%
With either a second mortgage or home equity loan, but not both:	180	9.8%	8,827	6.8%
Second mortgage only	0	0%	1,067	0.8%
Home equity loan only	180	9.8%	7,477	5.7%
Both second mortgage and home equity loan	0	0%	283	0.2%
No second mortgage and no home equity loan	934	50.6%	72,476	55.6%
Housing units without a mortgage	686	37.2%	45,869	35.2%

Source: U. S. Census Bureau, 2019-2023 American Community Survey 5-Year Estimates, Table B25081

The median rent in Stratford in 2023 was \$1,010 dollars monthly, compared to \$1,152 across Camden County overall. According to American Community Survey data there are 668 rental units in Stratford where a contract rent is paid. There are significant numbers of rental units at different price points. Approximately half of the rental units rent for more than \$1,000 per month. The lower rents in Stratford reflect an older inventory of rental units that are likely smaller than new construction apartments.

	Stratford Borough		Camden County	
	Units	Percent	Units	Percent
Total Renter Occupied Units	698	100%	70,139	100%
Less than \$200	49	7.0%	1,519	2.2%
\$200 to \$399	0	0%	3,383	4.8%
\$400 to \$599	0	0%	2,560	3.6%
\$600 to \$799	38	5.4%	4,445	6.3%
\$800 to \$999	238	34.1%	11,383	16.2%
\$1,000 to \$1,499	309	44.3%	27,552	39.3%
\$1,500 to \$1,999	28	4.0%	11,731	16.7%
\$2,000 to \$2,499	6	0.9%	3,692	5.3%
\$2,500 to \$2,999	0	0%	816	1.2%
\$3,000 to \$3,499	0	0%	329	0.5%
\$3,500 or more	0	0%	277	0.4%
No cash rent	30	4.3%	1,852	2.6%
Median Contract Rent	\$1,010		\$1,152	

Source: American Community Survey 2019-2023, 5-year estimates, Table B25056, Table 25058

C. Households

Households are defined as one or more people, related or not, living together as a housekeeping unit. In 2023 there were 2,544 total households living in Stratford Borough. Two-person households make up the largest household size at 29.6% of all households, followed closely by one person households (26.1%); which is comparable to County overall where 32.9% of households consist of two people and 27.7% consist of single person households. The average household size in Stratford is 2.7 persons, which is slightly higher than Camden County's average household size of 2.58. 18.5% of Stratford's households are four person households, compared to 14.3% for the County overall.

According to the U.S. Census, family households are defined as two or more persons living in the same household related by birth, marriage, or adoption. As shown in Table 10 a majority of households in the Borough are categorized as family households (69.3%). Households in Stratford consisting of a married couple with children under the age of 18 accounted for 20.4% of all households, compared with 20.2% for the County overall. Single parent households with children account for an additional 9.9% of all households in Stratford.

	Stratford Borough		County	
	Number	Percent	Number	Percent
Total Households	2,544	100%	176,046	100%
1-person household	663	26.1%	46,962	27.7%
2-person household	753	29.6%	57,994	32.9%
3-person household	382	15.0%	29,079	16.5%
4-person household	471	18.5%	25,903	14.7%
5-person household	163	6.4%	10,883	6.2%
6-person household	73	2.9%	3,609	2.0%
7-or-more-person household	39	1.5%	1,616	0.9%
Average Household Size	2.7		2.58	
Source: American Community Survey 2019-2023, 5-year estimates Table B25009 and S1101				

Table 10 Household Size and Type, 2020 Stratford Borough		
	Total	Percent
Total Households	2,544	100%
Family households	1,762	69.3%
<i>Married Couple Family</i>	1,250	49.1%
With own children under 18 years	518	20.4%
No children under 18 years	732	28.8%
<i>Other Family</i>	512	20.1%
Male householder, no spouse present	250	9.8%
With own children under 18 years	117	4.6%
Female householder, no spouse present	262	10.3%
With own children under 18 years	135	5.3%
Nonfamily Households	782	30.7%
Male householder	353	13.9%
Female householder	429	16.9%
Average Family Size	3.19	
Source: US Census Bureau, Decennial Census 2020; American Community Survey 2019-2023, 5-year estimates Table S1101		

D. Income Characteristics

1. Household Income

As measured in by the American Community Survey 2023 5-year estimate, median household incomes in Stratford are higher than that of Camden County, and comparable to median household income in the State of New Jersey overall. In 2023, the median household income in Stratford was \$100,735, which is \$14,351 more than Camden County overall and \$315 less than the State overall. Per capita income in Stratford is \$45,289 compared to \$44,380 in Camden County and \$53,118 for the State overall. This underscores the differences in household and family size.

	2023 Per Capita Income	2023 Median Household Income
Stratford Borough	\$45,289	\$100,735
Camden County	\$44,380	\$86,384
New Jersey	\$53,118	\$101,050
Source: 2023 American Community Survey 5-year Estimates, Tables 19013 and 19301		

The distribution of household income for Stratford Borough is provided in Table 12 below. The highest percentage of households (23.3%) fall into the \$100,000 to \$149,999 income bracket. In Stratford 24.5% of households earned less than \$50,000, compared to 29.9% of the County's households overall.

	Stratford Borough		Camden County	
	Number	Percentage	Number	Percentage
Total Households	2,544	100%	200,569	100%
Less than \$10,000	152	6.0%	10,455	5.2%
\$10,000 to \$14,999	117	4.6%	7,162	3.6%
\$15,000 to \$24,999	54	2.1%	12,319	6.1%
\$25,000 to \$34,999	86	3.4%	12,680	6.3%
\$35,000 to \$49,999	213	8.4%	17,492	8.7%
\$50,000 to \$74,999	314	12.3%	28,387	14.2%
\$75,000 to \$99,999	321	12.6%	24,794	12.4%
\$100,000 to \$149,999	593	23.3%	38,109	19.0%
\$150,000 to \$199,999	347	13.6%	21,882	10.9%
\$200,000 or more	347	13.6%	27,289	13.6%
Median Household Income	\$100,735		\$86,384	
Source: 2019-2023 American Community Survey 5-year Estimates, Tables B19001 and B19013				

2. Poverty Rates

The 2025 Federal Poverty Guidelines define poverty by income thresholds. For a one-person household the Federal poverty income is \$15,650, for a two-person household it is \$21,150, for a three-person household it is \$26,650 and for a four-person household it is \$32,150. Eligibility for assistance programs often use percentages of the federal poverty level to determine eligibility.

Since New Jersey is a high-income state with high cost of living, State programs typically use a higher income threshold (such as 138% of the Federal Poverty Level).

Table 13		
	Families	Individuals
Stratford Borough	7.0%	10.2%
Camden County	9.1%	12.2%
Source: US Census Bureau, 2019-2023 American Community Survey 5 year estimates, Tables S1701 and S1702		

3. Income Limits and Rents

In order to be eligible for deed restricted affordable housing in New Jersey, a household's income must be below the income limit for the region in which the housing is located. Generally, housing is considered affordable for a household if no more than 30% of gross income is spent on housing costs. Restricted affordable housing is made affordable for households earning up to 80% of the median income in the region. The Fair Housing Act and the Uniform Housing Affordability Controls (N.J.A.C. 5:80-26.1) define very-low income households (those earning up to 30% of the median household income for the region), low-income households (those earning up to 50% of the median household income for the region) and moderate-income households (those earning from 50% to 80% of the median household income for the region). The maximum income figures are adjusted for household size and the municipality's geographic location within the State (there are six regions) and are updated yearly.

The Uniform Housing Affordability Controls (UHAC) provide that the maximum rent for a qualified affordable unit must be affordable to households that earn no more than 60% of the median income for the region and the average rent must be affordable to households earning no more than 52% of the median income. The maximum sale prices for affordable units must be affordable to households that earn no more than 70% of the median income. The average sale price must be affordable to households that earn no more than 55% of the median income. Each time an affordable housing development or unit is being prepared for the market, the rent or sales price is calculated by the Borough's or the developer's certified administrative agent.

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

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

The table below shows illustrative affordable rents in region 5.

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

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

	Income	% of Median	Sale Price
1 BR			
	Very Low	30.00%	\$45,891
	Low	50.00%	\$96,763
	Mod	60.00%	\$ 122,198
	Mod	65.00%	\$134,916
	Mod	70.00%	\$147,634
2 BR			
	Very Low	30.00%	\$ 61,136
	Low	50.00%	\$122,170
	Mod	60.00%	\$152,687
	Mod	65.00%	\$167,946
	Mod	70.00%	\$183,204
3 BR			
	Very Low	30.00%	\$75,358
	Low	50.00%	\$145,874
	Mod	60.00%	\$181,132
	Mod	65.00%	\$198,761
	Mod	70.00%	\$216,390
Source CGP&H, May 2025			

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

E. Housing Affordability

1. For Sale Housing Units

Based on CGP&H's 2024 illustrative sales price numbers, as many as 76 housing units (in 2023) may be affordable to very low-income households (depending on the number of bedrooms in the unit). As many as 606 (40.8%) of for sale units may be affordable to low- and moderate-income households overall (depending on the number of bedrooms in the unit).

2. For Rent Housing Units

Based on CGP&H's 2025 illustrative rents, as many as 87 rental units in the Borough may be affordable to very low-income renters, depending on the number of bedrooms being rented (based on 2023 rents). Meanwhile, 634 units (90.8% of rental units) may be affordable to low- or moderate-income renters depending on the unit size. According to the American Community Survey data, nearly all of the rental units in the Borough may be affordable to low- or moderate-income households depending on the number of bedrooms being rented.

Housing is generally considered to be affordable if the costs of rents, mortgages, and other essential costs consume 28% or less of an owner-household's income or 30% or less of a renter-household's income. Homeowner rates are lower to account for the additional home maintenance costs associated with ownership. In Stratford, 22.2% of all households in owner occupied units are expending more than 30% of their income on housing, and 49.7% of renter households are spending more than 30% of their income on housing.

Monthly Housing Costs as % of Income	Owner Occupied		Renter Occupied		All	
	Units	Percent	Units	Percent	Units	Percent
Less than 20%	981	53.1%	267	38%	1,248	49.1%
20 to 29%	445	24.1%	54	7.73%	499	19.6%
30% or more	409	22.2%	347	49.7%	756	29.7%
Not Computed	11		30		41	1.6%
Total	1,846		698		2,544	100%
Remaining occupied units have zero income and/or no cash rent						
Source: 2019-2023 American Community Survey Table DP04						

F. Substandard Housing Capable of Being Rehabilitated

Approximately 90.3% of Stratford's housing stock was constructed before 1970. Overall housing in Stratford is well maintained, and homeowners take pride in the upkeep and preservation of their properties. In some communities, older housing units are the most likely to be substandard or in need of rehabilitation. However, in Stratford the older housing stock gives the Borough its character and value has been stable.

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

According to the American Community Survey Five Year Estimates, in 2023, there were 6 housing units in Stratford that were overcrowded (more than 1 person per room) and were in structures that were built before 1950. Twelve (12) units had incomplete kitchen facilities and twelve (12)

units had incomplete plumbing facilities. These conditions are used in New Jersey’s affordable housing methodology as indicators of housing deficiency (but differ from the numbers used in DCA’s calculations). However, the incomplete plumbing and kitchen scenarios are increasingly rare and may be misreported by individuals living in group quarters.

While there are very likely housing units in the Borough that are occupied by low or moderate income households that are in need of repair or replacement of one or more major systems, the Borough questions the validity of the present need calculation and the appropriateness of the proxy factors. The Borough’s tax assessor, zoning officer, and other professionals do not believe that there are truly 24 units in the Borough without complete plumbing and kitchens.

Table 18			
Stratford Borough Deficient Housing Units			
	Incomplete Plumbing	Incomplete Kitchen	Crowded and Build Prior to 1950
Number of Units	12	12	6
Source: 2019-2023 American Community Survey Five-Year Estimate Tables B25050 and B25051			

G. Employment Data

1. Labor Force Estimates

Table 19 details changes in employment among Stratford residents from 2007 through 2024. The numbers are estimates from the New Jersey Department of Labor and Workforce Development. Employment among Stratford residents in the labor force has remained relatively stable since 2007. The unemployment rate trend in Stratford has generally matched the unemployment rate trend in the County. Unemployment in Stratford increased during the recession in 2009 and lasted through 2013, when the employment rate began to decline, until 2020 when unemployment jumped up again during the global covid pandemic.

Year	Labor Force	Employment	Unemployment	Unemployment Rate
2007	3,804	3,663	141	3.7%
2008	3,861	3,687	174	4.5%
2009	3,896	3,593	303	7.8%
2010	3,420	3,104	316	9.2%
2011	3,459	3,106	353	10.2%
2012	3,620	3,228	392	10.8%
2013	3,534	3,203	331	9.4%
2014	3,490	3,229	261	7.5%
2015	3,537	3,328	209	5.9%
2016	3,789	3,637	161	4.2%
2017	3,798	3,637	178	4.7%
2018	3,764	3,618	146	3.9%
2019	3,817	3,679	138	3.6%
2020	3,830	3,464	366	9.6%
2021	3,809	3,565	244	6.4%
2022	3,867	3,720	147	3.8%
2023	3,955	3,792	163	4.1%
2024	3,970	3,807	163	4.1%

Source: New Jersey Department of Labor and Workforce Development Labor Force Estimates

2. Class of Worker

According to the American Community Survey data, the vast majority of workers (84.9%) living in Stratford in 2023 were part of the private wage and salary worker group. This group includes people who work for wages, salary, commission, and tips for a private for-profit employer or a private not-for-profit, tax-exempt or charitable organization. The second largest category was government worker (12.6%), followed by those who were self-employed (2.5%).

	Number	Percentage
Employed Civilian population 16 years and over	3,789	100.0%
Private Wage and Salary Worker	3,218	84.9%
Government Worker	477	12.6%
%Self-Employed Worker	94	2.5%
Unpaid Family Worker	0	0%

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

3. Employment by Industry

The table below indicates the industries that Stratford residents work in. According to the 2023 American Community Survey 5 year estimates, there were 3,789 employed Stratford residents in 2023.

Private Sector Category	Number of Jobs	Percent
Agriculture, forestry, fishing and hunting, and mining	0	0%
Construction	345	6.5%
Manufacturing	301	7.9%
Wholesale trade	202	5.3%
Retail trade	544	14.4%
Transportation and warehousing, and utilities	290	7.7%
Information	119	3.1%
Finance and insurance, and real estate and rental and leasing	321	8.5%
Professional, scientific, and management, and administrative and waste management services	267	7.0%
Educational services, and health care and social assistance	941	24.8%
Arts, entertainment, and recreation, and accommodation and food services	248	6.5%
Other services, except public administration	69	1.8%
Public administration	142	3.7%
Total Covered Employment	3,789	100%
Source: Source: 2023 American Community Survey 5-Year Estimates, Table DP03		

4. Stratford Borough Employment by Sector

There is limited information available about actual jobs and employers within individual municipalities. The New Jersey Department of Labor collects quarterly information on covered employment, which is employment and wage data for employees covered by unemployment insurance. This data excludes small businesses, self-employed people, part-time workers, and

some agricultural work that is not covered by unemployment. The U.S. Census Bureau’s Center for Economic Studies also tracks “covered employment” for various geographic areas. Covered employment data includes only those jobs for which unemployment compensation is paid. The data shows that there are 1,567 jobs in Stratford, whereas there are 3,970 residents in the labor force. This imbalance defines Stratford as a bedroom community. However it is notable that the data does not indicate any jobs in the health and social services sector, when the Rowan-Virtua School of Osteopathic Medicine is located within Stratford and there are ancillary medical offices in the area.

Industry ID and Description		Avg Units	Avg Employment
	Federal Govt	1	38
	Local Govt	2	201
61	Local Govt- Education	1	145
23	Construction	8	70
31	Manufacturing	-	-
42	Wholesale Trade	-	-
44	Retail Trade	16	188
51	Information	-	-
52	Finance/Insurance	4	26
53	Real Estate	5	25
54	Professional/Technical	12	35
55	Management	-	-
56	Admin/Waste Remediation	5	15
62	Health/Social	-	-
71	Arts/Entertainment	-	-
72	Accommodation/Food	15	105
81	Other Services	15	49
99	Unclassifieds	-	-
	Totals	126	1,567

Source: NJ Department of Labor & Workforce Development, Quarterly Census of Employment and Wages by sector, 2023.

H. Population and Housing Projections

The Delaware Valley Regional Planning Commission (“DVRPC”) is the Metropolitan Planning Organization (“MPO”) for all of Region 5, including Camden County, and publishes population and employment projections. The DVRPC projects that Stratford’s population will decrease by .3% and employment will increase by 9.5%, from 2020 to 2050. As Table 23, Population, and Employment Projections, 2020 to 2050 shows, population is expected to decline slightly in Stratford, whereas Camden County overall is expected to grow 1.3%. Employment is expected to grow in both the Borough and the County.

Stratford is a built-out municipality, so without redevelopment, and with the trend toward smaller household sizes, population would likely decline. However, the Borough has identified redevelopment opportunities that will offer the potential for residential and mixed use redevelopment projects that will meet the Borough’s fair share obligations. These redevelopment opportunities will at to the vitality of the housing stock, and will increase the housing supply, but with decreasing household sizes, the population may remain stable.

Table 23						
Population, and Employment Projections, 2020 to 2050						
	Stratford Borough			Camden County		
	2020	2050	% Change	2020	2050	% Change
Population	6,981	6,962	-0.3%	523,485	529,692	1.2%
Employment	6,655	7,284	9.5%	264,617	299,051	13.0%
Source: DVRPC County and Municipal Population and Employment Forecasts 2020-2050						

The Fair Housing Act requires that the Housing Element include a projection of the municipality's housing stock, including the probable future construction of low- and moderate-income housing, for the next ten years, taking into account, but not necessarily limited to, construction permits issued, approvals of applications for development and probable residential development of lands.

Though the DCA’s Construction Reporter data indicates that 18 net new certificates of occupancy have been issued in Stratford over the eleven-year period between 2013 and 2023, but this number misses 24 of the Berlin Road redevelopment units. Additionally, this number does not specifically inform the Borough’s growth projection for the next ten years. Since Stratford is a built-out community, growth is not linear and cannot be projected based on the availability of infrastructure or vacant land. Residential growth depends on the availability of redevelopment sites, the ability of would-be developers to assemble land, marketability of redevelopment opportunities, and the willingness of the municipality to plan for and enable redevelopment. Table 25 includes information about approved and projected development.

Year	Certificates of Occupancy	Demolitions	Net New Dwellings
2013	7	7	0
2014	6	6	0
2015	5	13	-8
2016	4	4	0
2017	1	0	1
2018	0	0	0
2019	0	0	0
2020	0	1	-1
2021	1	0	1
2022	0	0	0
2023	25	0	25
Total	49	31	18
Annual Average	4.45	2.8	1.63
Ten Year Linear Projection: 16			
Source: NJDCA Construction Reporter, Yearly Summary Data			

Development Name	Unit Type	Status	# of Units	Projected Completion
Laurel Mills Redevelopment	Townhouses	Approved	80	2028
Bradlees/Juster Redevelopment	Apartments	Projected	216	2030
One Colby	Veteran Apartments	Approved	20	2026
Laurel Road Redevelopment	Apartments	Projected	45	2032
Total Projected Housing Units through 2035			361	
Total Projected Affordable Housing Units Through 2035			88	

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

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

The Borough has tried to foster positive working relationships with potential redevelopers. Since the adoption of the Third Round Housing Element and Fair Share Plan in December of 2016, several developers/redevelopers have approached the Borough with possible residential redevelopment projects. The Borough has worked with developers to establish the foundations for contextually appropriate inclusionary redevelopment projects and supportive and special needs housing. The Borough and developers have coordinated to establish mutually agreeable site and building design requirements, and the Borough has made accommodation for additional housing opportunities in locations well suited to accommodate them. While the Borough has and will continue to evaluate opportunities for inclusionary redevelopment, it does not believe that every potentially redevelopable property is ripe for or appropriate for residential development. Stratford is home to Jefferson Health hospital and Rowan University/ Virtua Health medical school campus. The medical school has expanded its land holdings in recent years. These facilities bring benefits to the area but are tax-exempt properties. The Borough must continue to coordinate a sustainable balance of land uses. As a means to provide additional affordable housing opportunities through redevelopment, the Borough will prepare and adopt redevelopment plans that set clear expectations and aim to incentivize inclusionary redevelopment while also encouraging investment in nonresidential properties and upholding the Borough's site and design standards. The compliance proposals are explained in section IV.C and D.

There has been discussion about the potential for residential redevelopment of Block 58 Lots 28-32, 34, 35, and 37 (the bowling alley property) on the east side of the White Horse Pike (Route 30). The governing body has engaged in discussions with a potential redeveloper. If this commercial site were redeveloped with a residential community, the Borough would aim to put one of the other inclusionary redevelopment sites (block 62 Lot 2) back to commercial use, in an effort to maintain balanced redevelopment. The potential for redevelopment of this site is being considered in the context of the Borough's overall compliance picture. It is not included in the compliance plan at this time because it is the Borough's understanding that the current commercial use of the site remains viable.

Stratford Borough has a sanitary sewer system that consists of three pump stations, approximately 147,000 linear feet of sewer lines and three pump stations. The Borough's pump station #1 is an underground pump station that is operating at capacity. Any redevelopment projects that contribute sewer flow to this pump station will need to contribute to its improvement. The Borough's system connects to the Camden County Municipal Utilities Authority's conveyance

system, which conveys wastewater to the treatment facility in Camden City. New Jersey American Water company provides water service to Stratford Borough.

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

J. Consistency with Recommendations of Multigenerational Family Housing Continuity Commission

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

IV. Fair Share Plan

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

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

Stratford Borough Fair Share Obligation	
Fourth Round Present Need /Rehabilitation Obligation	10
Prior Round Prospective Need	70
Third Round Gap and Prospective Need	59 ⁵
Fourth Round Prospective Need	25

The Affordable Housing sites are shown on Map 2.

A. Present Need/Rehabilitation Share

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

⁵ Following Judge Jacobson's 2018 decision In the Matter of the Application of the Municipality of Princeton, L-1550-15 (directly involving West Windsor and Princeton), Econsult Solutions Inc. used the workbooks from the decision to extrapolate Third Round obligations for all municipalities in the State. For Stratford this Third Round number is 59. In 2016 when Stratford entered into a Third Round Settlement Agreement with Fair Share Housing Center, the settlement established the Third Round prospective as 91. The Third Round number from the Jacobson decision is a 32-unit reduction from 91. Since Stratford is a built-out municipality entitled to a vacant land adjustment, the reduction does not "change" the Borough's Fair Share Plan, as the 32 unit difference is part of the "unmet need". However, the Borough proposes to utilize the "Jacobson number" as the Third Round obligation.

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

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

According to the DCA's evaluation of HUD's Comprehensive Housing Affordability Strategy dataset there are 10 owner-occupied homes in Stratford that lack complete kitchen or plumbing facilities, and that 100% of those are occupied by low- and moderate-income households. The data also indicate that there are 20 housing units that are overcrowded and old, but that none of them are occupied by low- and moderate-income households. The Borough's present need (rehabilitation) obligation is therefore 10 units.

The Borough's tax assessor, zoning officer, and planner are not aware of any units lacking a complete kitchen or plumbing system. The Borough does believe that there are residential units in need of repair or improvement of major systems that would benefit from a rehabilitation program, but there is doubt about the validity of the methodology.

The Borough participates in the Camden County Home Improvement Program, which provides 0% interest loans of up to \$20,000 to income qualified residents of the Borough to correct substandard housing conditions and to eliminate health and safety hazards. Twenty (20) Stratford households have participated in the program since 1997. The Borough will continue participating in the County program.

Additionally, the Borough has initiated a municipal rehabilitation program to accelerate the Borough's ability to satisfy its present need obligation. A Rehabilitation Program Manual has been prepared (Appendix E) to describe the basic content and operation of the rehabilitation program, outline program purposes and provide guidelines for implementing the program. The manual also explains the steps in the rehabilitation process, describes the eligibility requirements for participation in the program, program criteria, funding terms and conditions, cost estimating, contract payments, record keeping and overall program administration. The program is funded by the Borough's Affordable Housing Trust Fund (Spending Plan is Appendix F). The Rehabilitation program is being administered by the Borough's administrative agent.

B. Vacant Land Adjustment

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

Stratford Borough applied for and was granted a vacant land adjustment in the Third Round. Most recently, the Third Round settlement agreement between Stratford and Fair Share Housing Center, signed by the Borough on November 9, 2016, provided that the Borough had a realistic development potential ("RDP") of 22 units and an "unmet need" of 139 units.⁶ The Court entered a final judgement of compliance in favor of Stratford on July 5, 2017. The Borough's Third Round Housing Element and Fair Share Plan provided the means to satisfy the RDP (detailed in section IV C below).

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

Stratford Borough again requests a vacant land adjustment of the prospective need obligation. It is well established that Stratford is a "built out" municipality. The RDP established for the Third Round (22 units) has been satisfied as set forth in section IV.C below. The zoning to enable inclusionary development of Block 62 Lot 8 remains in place and viable. This 6.9 acre property is the only significant vacant and developable property in the Borough.

Stratford's Fourth Round prospective need obligation is 25 units. The Fourth Round municipal obligations were calculated by the DCA using the methodology set forth in the Fair Housing Act

⁶ Following Judge Jacobson's 2018 decision In the Matter of the Application of the Municipality of Princeton, L-1550-15 (directly involving West Windsor and Princeton, but having statewide implications), the third round "numbers" were recalculated by Econsult Solutions Inc. using the formula established by that decision. Stratford's combined prior round, gap present need and third round prospective need under the Jacobson methodology is 129 (a 32-unit reduction from 161). Subtracting the RDP of 22, The Borough's "unmet need" would thereby be reduced from 139 to 107.

and as explained in DCA's report entitled "Affordable Housing Obligations for 2025-2035 (Fourth Round) Methodology and Background". Prior to adopting Resolution 2025:25 (accepting the Fourth Round fair share obligation), the Borough's affordable housing planner and Borough staff reviewed DCA's land capacity analysis and identified parcels that should not have been included as vacant and available. For Stratford Borough there were only 14 polygons, totaling 4.618 vacant developable acres shown on DCA's land capacity factor map to start with. The Borough's evaluation of each parcel reduced the vacant and developable land to .99 acre. The other land identified by DCA in its analysis is Borough owned open space and slivers of land on lots that are already part of Third Round inclusionary sites. The list of lots that were included as vacant and potentially developable in DCA's analysis, but that are not in fact developable are included as Appendix C.

The vacant land resource constraints in Stratford that were affirmed in the Third Round remain. There is no undeveloped or traditionally vacant land available in the Borough that is not already zoned for inclusionary housing (or included in a redevelopment plan that does the same). All future development, with the exception of infill on Block 62 lot 8, in the Borough will be redevelopment. Stratford is committed to enabling contextually appropriate redevelopment to meet all of its interconnected land use planning goals, including the provision of opportunities for affordable housing and nonresidential uses to support the local economy. As part of its ongoing planning efforts, the Borough has identified areas likely to redevelop over the course of the fourth round and will provide zoning and/or redevelopment plans to enable the development of at least 25% of the calculated prospective need (7 affordable housing units). The remaining "unmet need" will continue to be accommodated if and when additional redevelopment opportunities are identified.

C. Look Back to Prior Rounds

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

In addressing prior round obligations, the municipality shall demonstrate how any sites that were not built in the prior rounds continue to present a realistic opportunity, which may include proposing changes to the zoning on the site to make its development more likely, and which may also include the dedication of municipal affordable housing trust fund dollars or other monetary or in-kind resources. The municipality shall only plan to replace any sites planned for development as provided by a prior court approval, settlement agreement, or approval by the council, with alternative development plans, if it is determined that the previously planned sites no longer present a realistic opportunity, and the sites in the alternative development plan provide at least

an equivalent number of affordable units and are otherwise in compliance with the "Fair Housing Act," P.L.1985, c.222 (C.52:27D-301 et al.) and the Mount Laurel doctrine.

1. Realistic Development Potential (RDP) Obligation

As described above, based on the vacant land adjustment that was granted in the Third Round, the Borough’s RDP was set at 22 affordable units. The proposed means to satisfy the RDP was set forth in the November 3, 2016 Settlement Agreement and the Third Round Housing Element and Fair Share Plan adopted in January 2017. The Third Round Settlement Agreement is included as Appendix D. Ordinance 2021:07 amending the R-4 zoning district to enable inclusionary multi-family development of Block 62 Lot 8 was adopted on May 11, 2021. The zoning enables development of the site at a density of 16 dwelling units per acre with a 15% affordable housing set aside (for rental units). The zoning provides lot, bulk, and design standards and requires that affordable units be constructed, operated, and administered consistently with the Fair Housing Act and the Uniform Housing Affordability Controls. It is anticipated that the site may be developed with up to 110 family rental units, of which 17 would be restricted affordable units.

COAH’s Second Round rules, contained at N.J.A.C. 5:93, provide the parameters that permit affordable housing credits and bonuses to be applied toward affordable housing obligations for the Prior Round and Third Round. When the site receives site plan approval, the applicable bonus credits will be calculated and affirmed.

A summary of Stratford’s RDP compliance plan is provided on the table below.

Stratford Borough						
Realistic Development Potential: 22						
Block	Lot	Compliance Mechanism	Type	Status	Units	Bonuses
62	8	Inclusionary Zoning (White Hall Apts Land)	Family Rent	Zoned	17	5
Total					17	5
					22	

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

1. Minimum number of rental units (25% of obligation): 6
2. Maximum number of age restricted units (25% of obligation minus RCAs): 6
3. Bonus credits (max 25% of obligation): 5

2. Prior Round/Third Round Unmet Need Obligation

After subtracting the RDP of 22 from Stratford’s cumulative Prior Round and Third Round obligation of 129, the remaining unmet need is 107 units. The Third Round Settlement Agreement (Appendix D) provided that opportunities for 55 affordable units would be provided through redevelopment. In the years following the Settlement Agreement there has been interest in both of the “unmet” needs sites, though neither has yet come to fruition. On the other hand, opportunities have arisen at sites that had not been anticipated at the time of the Third Round Settlement. The Borough has been in communication with Fair Share Housing Center about the status of the “Laurel Mills” and “Bradlees” unmet need redevelopment sites, and the Borough has also provided status reports outlining the additional opportunities that have arisen.

The first table includes the “original” proposal to provide 55 to 60 units of unmet need for the Third Round (as set forth in the Third Round Settlement Agreement). The second table on the following page includes opportunities that emerged since the Third Round Fair Share Plan was adopted.

Stratford Borough						
ORIGINAL Third Round Unmet Neet Proposals – 55 units to 60 units						
Block	Lot	Compliance Mechanism	Type	Status	Units	Bonuses
116	14, 14.04	Inclusionary Redevelopment Laurel Mills Site	Family For Sale	Approved	12	0
62	2, 4, 7, 18	Inclusionary Redevelopment Bradlees/Juster Site	Family Rent	Zoned (Redevelopment)	43 to 48	0
Total					55 to 60	

Block 116 Lots 14 and 14.04- Laurel Mills Site

This site was designated as an Area in Need of Redevelopment in 2011. Following the Third Round Settlement, the Laurel Mills Redevelopment Plan was amended to enable mixed use redevelopment of the site. The Third Round Settlement had anticipated that the site would be developed with 60 total units (12 affordable). The subdivision and site plan that were approved in 2019 and amended in 2021 resulted in a total of 80 units (16 affordable). The redeveloper and the Borough entered into a Redevelopment Agreement, but the Borough has had to go to Court several times to enforce the agreement. It is the Borough’s understanding that the defaulting redeveloper has negotiated an agreement with D.R. Horton to develop the site. The Borough is communicating with the redeveloper to determine whether the agreement will be assigned to the builder or whether the redevelopment agreement needs to be re-negotiated. The Borough aims to facilitate expeditious redevelopment of the site consistent with the intent of the Fair Share Plan and Redevelopment Plan. The resolution of approval for this site is included as Appendix G.

Block 62 Lots 2, 4, 7,18 – Bradlees/Juster Site

This site was designated as an Area in Need of Redevelopment in 2011. In 2016 the site was designated as a Condemnation Redevelopment Area (Resolution 2016-108). Following the Third Round Settlement, the redevelopment plan for the site was amended to enable mixed use inclusionary redevelopment. The Third Round Settlement had anticipated that depending on the site design, the redevelopment area would be developed with between 216 and 240 residential units which would yield between 43 and 48 affordable rental units.

Since the Borough committed to provide opportunities for 55 to 60 “unmet need” units in the Third Round, the Borough has continued to strive for that number. The table below provides the current status of unmet need proposals, which exceed the unmet need proposals in the Third Round Settlement Agreement by 40 units.

Stratford Borough						
Current Status of Third Round Unmet Neet Proposals						
Block	Lot	Compliance Mechanism	Type	Status	Units	Bonuses
116	14, 14.04	Inclusionary Redevelopment Laurel Mills Site	Family For Sale	Approved	16	-
62	2, 4, 7, 18	Inclusionary Redevelopment Bradlees/Juster Site	Family Rent	Zoned (Redevelopment)	43 to 48	-
53	1-6	Inclusionary Redevelopment Berlin Road Site (Ryan Homes)	Family For Sale	Complete	8	-
3	1	D Variance & Site Plan Veterans Supportive Housing	SSN	Under Construction	20	-
87.01	4.01 & 6.03	D Variance & Site Plan Creekside/Former Christian Academy	Senior Rent	Approved	8	-
Total					95 to 100	

Crediting Parameters

The Third Round is subject to the following crediting parameters. The calculations below are based on the minimum of 55 unmet need credits required by the Third Round Settlement.

Additional units alter the calculations.

1. Maximum Rental Bonuses (25% of obligation) = **14**
2. Minimum Third Round Total Family Units (50% of obligation- bonuses)= 14
3. Maximum Third Round Age-Restricted Units (25% of obligation) = 14
4. Minimum Third Round Rental Units (25% of obligation) = 14
5. Minimum Third Round Family Rental Units (50% of required rental)= 7
6. Minimum Third Round Very Low-Income Units (13% of units approved/created after 7/17/2008) = **7**

7. Minimum Third Round Very Low-Income Family Units (50% of required very low income units) = 4

Map 2 shows the location of the affordable housing sites.

Berlin Road

Block 53 Lots 2, 3, 6 (Now Block 53.01 Lots 1-51)

110 Berlin Road

8 Family For Sale Units

In 2019 Borough Council adopted a redevelopment plan for this site. A subdivision and site plan to permit 49 residential units including 8 affordable units, was approved on September 24, 2020. All units were occupied as of April 9, 2024. The list of affordable units and deed restrictions are included as Appendix H.

One Colby Avenue

Supportive and Special Needs – Adaptive Reuse

Block 3 Lot 1

20 Supportive Housing Units for Disabled Veterans

In 2018 The Zoning Board granted a Use Variance and Site Plan approval to permit the former office building to be converted to affordable permanent supportive residential units for disabled veterans. The resolution of approval is included as Appendix I. Building permits were issued in August of 2022. The property owner and redeveloper is working with local veterans organizations to provide support services for the development.

Creekside/Former Christian Academy

Inclusionary Redevelopment

Block 87.01 Lots 4.01 & 6.03

710 West Laurel Road

8 Senior Units

In 2022 the Zoning Board granted a Use Variance and Site Plan to permit this site to be redeveloped with 82 assisted living units and 105 independent living units. Eight assisted living units will be Medicaid waiver units and will be restricted for occupancy by low-and moderate-income individuals. The independent living portion of the site will pay the mandatory development fee (2.5% equalized assessed value) to the Affordable Housing Trust Fund. The payment will support the Borough's rehabilitation program and will provide infrastructure support to inclusionary development projects (as set forth in the Spending Plan). The resolution of approval for this site is Appendix J.

D. Fourth Round Prospective Need

The amended Fair Housing Act defines prospective need as a “projection of housing needs based on development and growth which is reasonably likely to occur in a region or municipality, as the case may be, as a result of actual determination of public and private entities.” The methodology for calculating the prospective need is set forth at N.J.S.A. 52:27D-304.3(c). The prospective need is calculated based on three factors: the nonresidential valuation factor, the income capacity factor, and the land capacity factor. The three factors are averaged to yield the municipality’s average allocation factor for distributing the regional prospective need to the municipality. NJDCA calculated Stratford’s Fourth Round number to be 25.

For the Fourth Round, the Fair Housing Act provides that any municipality that receives an adjustment of its prospective need obligations based on a lack of vacant land shall, as part of the process of adopting and implementing its housing element and fair share plan, identify sufficient parcels likely to redevelop during the current round of obligations to address at least 25 percent of the prospective need obligation that has been adjusted, and adopt realistic zoning that allows for such adjusted obligation, or demonstrate why the municipality is unable to do so. The table below outlines the Borough’s proposal to adopt zoning (via a Redevelopment Plan) to enable the production of 6 affordable housing units (25% of the Fourth Round obligation of 25). The locations of the affordable housing site are included on Map 2.

Stratford Borough						
Fourth Round Prospective Need: 25 --- 25% Required Unmet Need Zoning: 6						
Block	Lots	Compliance Mechanism	Type	Status	Units	Bonuses
36	1, 2, 4, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16	Inclusionary Redevelopment	Family Rental	Proposed Redevelopment Plan to be Adopted	9-12	TBD
40	2, 3, 4, 5, 6, 7, 9, 10	Inclusionary Redevelopment				
41	2, 2.01, 3, 4, 5, 6, 7, 8	Inclusionary Redevelopment				
Total						

1. Fourth Round Requirements and Bonus Credits

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

N.J.S.A. 52:27D-311(k) provides that a municipality is permitted to satisfy up to 25% of its prospective need obligation through the use of bonus credits. For Stratford's Fourth Round obligation (25 units) this is 6 Bonus Credits. The following types of bonus credits may be available as part of Stratford's Fourth Round fair share plan. The bonus credits should only be claimed proportionate to the unmet need that is produced.

- N.J.S.A. 311(k)(1) provides that for low- and moderate- income housing for individuals with special needs or permanent supportive housing, municipalities may claim 1 bonus credit per unit.
- N.J.S.A. 311(k)(5) provides that for each unit of low- or moderate-income family housing with at least three bedrooms above the minimum number required by the bedroom distribution (pursuant to the Uniform Housing Affordability Controls) the municipality may claim .5 bonus credit per unit.
- N.J.S.A. 311(k)(6) provides that for each unit of low- or moderate-income housing constructed on land that is or was previously developed and utilized for retail, office, **or commercial space the municipality may claim .5 bonus credit per unit.**

2. East Laurel Road Redevelopment Area

Block 36 Lots 1, 2, 4, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16

Block 40 Lots 2, 3, 4, 5, 6, 7, 9, 10

Block 41 2, 2.01, 3, 4, 5, 6, 7, 8

The redevelopment area properties are underutilized and are proximate to the Rowan University/Virtua medical school and the Jefferson Health hospital. The properties were designated as an Area in Need of Redevelopment by Resolution 2024:63. The redevelopment investigation report (including maps identifying the area) is included as Appendix K. The Borough initiated the redevelopment planning process for this three-block area to enable coordinated planning and to encourage private investment in the area. The current development pattern includes numerous small lots with private driveways.

The redevelopment plan will encourage consolidation of lots with combined access points on the side streets and at selected areas along E. Laurel Road. Many of the lots are only 140 feet deep, which is challenging for single lot development. Lot consolidation, however, will enable creative site design. The Redevelopment Plan will allow commercial space and multi-family residential development with a minimum square footage of commercial space required on the first floor of some (or all) buildings. Parking will be located at the rear and will connect through each block. The Redevelopment Plan will allow two to three story buildings and will permit flexibility as to the number of residential units. The three blocks combined may yield up to 60 units including 9 to 12 affordable units.

The Redevelopment Plan will be prepared and added as an Appendix to this plan.

E. Site Suitability

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

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

Available Site

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

Suitable Site

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

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

Developable Site

A developable site means a site that has access to appropriate water and sewer infrastructure, and is consistent with the applicable areawide water quality management plan (including the wastewater management plan) or is included in an amendment to the areawide water quality management plan submitted to and under review by DEP.

All of the sites are developable.

Approvable Site

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

All of the sites are approvable. Redevelopment Plans will be adopted to enable the proposed inclusionary housing and will be added as an Appendix to this Plan.

F. Affordable Housing Trust Fund

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

Stratford Borough adopted its updated Affordable Housing Development Fee requirements by Ordinance 2021:08 on May 11, 2021. The Affordable Housing Development Fee requirements (Borough Code section 17.05.020) will be updated and adopted to reflect the dissolution of COAH and the current Court led process. A new Spending Plan was prepared and adopted on May 11, 2021 by resolution 2021:83 and was amended by Resolution 24:121 on September 5, 2024. The Spending Plan will be updated to project revenues and plan for expenditures during the Fourth Round period. The Updated Spending Plan will be added as an Appendix to this plan upon completion and adoption.

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

As of December 31, 2024 there was \$133,329.26 in Stratford's Affordable Housing Trust Fund. One payment was collected from an infill residential lot and one payment was collected from a self-storage facility. Development fee revenues have been minimal, as the Borough is built out and there is little "new" construction. However, some additional revenues may be collected over the next ten years and will be projected in the updated Spending Plan.⁷ While new homes constructed on infill residential lots will pay into the fund, residential redevelopment proposals consisting of 4 or more residential units will be inclusionary and therefore will not pay development fees. Development fees are only permitted to be expended in accordance with an approved spending plan.

The amended Fair Housing Act required that the DCA promulgate updated regulations related to the establishment, administration, reporting, and enforcement of the expenditure of

⁷ The Independent Living portion of the proposed Creekside at Stratford continuing care facility at the former Christian Academy site (Block 97.01 Lots 4.01 and 6.03) will pay the 2.5% mandatory development fee. The assisted living portion of the site will be inclusionary (8 unit set aside).

affordable housing development fees by municipalities, which shall include establishing an expedited process for approving spending plan expenditures for emergent opportunities to create affordable housing after a municipality has obtained compliance certification and procedures for monitoring the collection and expenditure of trust funds, The Borough will avail itself of this process if the need arises.

G. Cost Generation

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

H. Administration

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

Stratford Borough's administrative agent is Triad Associates. Triad is working with the Borough to implement a municipal rehabilitation program, to administer existing affordable units, update deed restrictions and other compliance documents as needed and will administer new units that are created in the Borough. The administrative agent will also work with the Borough's affordable housing planner and the Municipal Housing Liaison to ensure documentation and monitoring of the affordable housing inventory.

I. Monitoring

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

amounts, and documentation of the balance remaining in the affordable housing trust fund as of December 31 of that year.

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