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2025 Housing Element & Fair Share Plan

Borough of High Bridge

May 22, 2025

Prepared for:

Borough of High Bridge

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Hunterdon County, New Jersey

Adopted by the Planning Board: June 16, 2025

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The original of this report was signed and sealed in accordance with NJSA 45:14A-12.

HIB-0185

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I. Introduction

According to the Fair Housing Act, a Housing Plan Element shall be designed to meet the municipality's fair share of its region's present and prospective housing needs, with particular attention to low- and moderate-income housing.

Affordable housing in New Jersey has a long, convoluted history dating back to 1975, when the New Jersey Supreme Court ruled that each municipality within the State has a constitutional obligation to provide a realistic opportunity for the construction of their fair share of affordable housing. This landmark decision is commonly referred to as Mount Laurel I, as the defendant was the Township of Mount Laurel. In 1983 the New Jersey Supreme Court upheld its Mount Laurel I decision and created builder's remedy as a means of enforcement (known as Mount Laurel II). In response to the court decisions, the Fair Housing Act ("FHA") was adopted in 1985 which provided an administrative process for municipal compliance. The FHA also created the Council on Affordable Housing ("COAH"), which was responsible for promulgating municipal obligations, adopting regulations, and administering the compliance process. The first round of affordable housing spanned from 1987 to 1993. This was followed by the second round from 1993 to 1999.

The third round of affordable housing commenced in 1999, but COAH failed to establish new affordable housing obligations. Several lawsuits were filed between 2008 and 2015 regarding the obligation. Ultimately, on March 10, 2015, the Supreme Court ruled that COAH failed to act and as a result, the Courts assumed jurisdiction over the Fair Housing Act. The decision and accompanying Order divided municipalities into one of three categories – those that achieved Third Round Substantive Certification, those that filed or petitioned COAH and those that had never participated in the COAH process.

The transitional process created by the Supreme Court tracked the Fair Housing Act procedures for compliance. In this regard, the process permitted municipalities to file a Declaratory Judgment Action during a 30-day window between June 8 and July 8, 2015 that sought an adjudication as to their fair share. This would enable the municipality to comply voluntarily with its constitutional obligation to provide a realistic opportunity for the construction of its fair share of the regions' low- and moderate-income households.

On January 18, 2017, the Supreme Court ruled that municipalities are responsible for obligations accruing during the so-called "gap period," the period between 1999 and 2015. However, the Court stated that the gap obligation should be calculated as a never-before calculated component of Present Need (also referred to as Rehabilitation Obligation), which would serve to capture Gap Period households that were presently in need of affordable housing as of the date of the Present Need calculation (i.e. that were still income eligible, were not captured as part of traditional present need, were still living in New Jersey and otherwise represented a Present affordable housing need).

Between 2015 and 2024 towns that elected to voluntarily comply with their constitutional obligation participated in mediation sessions, reached settlement agreements, adopted Housing Element and Fair Share Reports, and most towns concluded the process with a judgment of repose and compliance. As a result of COAH's inability to function, the third round period spanned from 1999 to 2025.

Then, on March 20, 2024, Governor Murphy signed legislation that dramatically modified the State's affordable housing regulations. The 75-page bill, known as A4, abolished COAH, modified the

process of affordable housing compliance, amended bonus credits, and, among other changes, set forth several important deadlines. P.L. 2024, c.2 ("Amended FHA") charged the Department of Community Affairs ("DCA") with the preparation of fourth round obligations and set forth aggressive timelines for compliance. In October of 2024, DCA published a report on its calculations of regional need and municipal present (Rehabilitation Obligation) and prospective (Fourth Round Obligation) fair share obligations. The Report is entitled "Affordable Housing Obligation of 2025-2035 (Fourth Round) Methodology and Background". The DCA calculated High Bridge's present need obligation as 4 and its prospective need obligation as 33. Municipalities were required to adopt a binding resolution outlining their present and prospective fair share obligations by January 31, 2025. On January 23, 2025, the Borough Council adopted Resolution 077-2025 accepting the DCA's calculations of the Borough's present need and modifying the prospective need obligation, subject to any vacant land and/or durational adjustment. The Borough of High Bridge also filed a "Complaint for a Declaratory Judgment of Compliance with the Fair Housing Act" on January 24, 2025 as part of the compliance certification process outlined in the Director of the Administrative Office of the Courts Directive #14-24.

During the 30-day challenge window, the New Jersey Builders Association filed a challenge. On March 31, 2025, mediation was held and the parties agreed to settle at 31 units.

This is the Borough of High Bridge's Housing Element and Fair Share Plan ("HEFSP") for the period between 2025 and 2035, known as the Fourth Round. High Bridge seeks to voluntarily comply with its constitutional obligation to provide a realistic opportunity for affordable housing. This HEFSP is prepared utilizing the Prior Round Rules¹, Third Round Rules² (as applicable), and the amendments implemented in P.L. 2024, c.2. Each municipality in the State has a four-part obligation:

1. Rehabilitation Obligation
2. Prior (First and Second Round) Obligations (1987-1999)
3. Third Round Obligation (1999 – 2025)
4. Fourth Round Obligation (2025-2035)

Affordable Housing History

A summary of High Bridge's affordable housing timeline is included below:

- **April 4, 1988** | High Bridge's First Round affordable housing plan received Substantive Certification from COAH.
- **September 8, 2004** | COAH issued Second Round Substantive Certification to the Borough.
- **July 7, 2015** | High Bridge filed a Declaratory Judgment Action seeking to comply with its constitutional mandate to provide affordable housing in accordance with the March 10, 2015 New Jersey Supreme Court Order.
- **December 15, 2017** | Settlement Agreement with Fair Share Housing Center executed (see Appendix A).

¹ NJAC 5:91 (Procedural) and NJAC 5:93 (Substantive) Rules. They can be found at: [New Jersey Department of Community Affairs | Second Round Regulations](#)

²NJAC 5:96 (Procedural) and NJAC 5:97 (Substantive) Rules, which can be found at: <https://nj.gov/dca/dlps/hss/thirdroundregs.shtml>

- **August 9, 2018** | Final Judgment of Compliance and Repose issued by Judge Miller (see Appendix B).
- **January 23, 2025** | Borough Council Resolution 077-2025 Committing to Fourth Round Obligation adopted (see Appendix C).
- **January 24, 2025** | Borough of High Bridge “Complaint for a Declaratory Judgment of Compliance with the Fair Housing Act” filed (see Appendix D).
- **April 8, 2025** | Order setting Fourth Round Obligation entered by Judge Mennen (see Appendix E.)
- **April 11, 2025** | Resolution 129-2025 adopted approving the mediated fourth round obligation (see Appendix U).

Municipal Summary

The Borough of High Bridge is located in northern Hunterdon County and encompasses 2.4 square miles. High Bridge is centered around a small, mixed-use, and walkable downtown along Main Street, which is surrounded by residential uses and recreational and open space. Other non-residential uses are present along West Main Street. High Bridge is located at the western terminus of the Columbia Trail, which travels east toward Washington Township in Morris County. The Borough is also located at the western end of the NJTransit Raritan Valley Line and has access to the Hunterdon Link bus system.

The Borough is bordered by Lebanon Township to the north and Clinton Township to the east, south, and west. The Borough is located in the Highlands Region and is entirely within the Highlands Planning Area. High Bridge petitioned the Highlands Council for Plan Conformance on December 24, 2009. On January 11, 2011, the Highlands Council approved the Borough’s Petition via Highlands Council Resolution 2011-2 (see Appendix F).

Between 2010 and 2020, High Bridge’s population slightly decreased by just over 100 from 3,648 to 3,546 residents.³ It should be noted that the 2023 American Community Survey (“ACS”), which is the most recent Survey available, estimates the Borough’s population at 3,584 residents, which represents a gain of 38 residents (1.1%) since the 2020 Census.⁴ The North Jersey Transportation Planning Authority (“NJTPA”) projects that the Borough will grow to 3,690 residents by the year 2050.⁵

Affordable Housing Obligation

The Borough of High Bridge has committed to a Rehabilitation Obligation of 4 units. The Borough’s Prior Round Obligation (“PRO”), as indicated by its Second Round Substantive Certification is 27. High Bridge agreed to a 90-unit Third Round Obligation (“TRO”). However, the Borough conducted a Vacant Land Adjustment (“VLA”) analysis using tax data and environmental data to determine a Realistic Development Potential (“RDP”) of 19. Additionally, the Borough was granted a Durational Adjustment of the RDP from 19 to 11 due to sewer service area limitations. Both adjustments were approved by the Court. Finally, the Borough’s Fourth Round Obligation (“FRO”) is 31. However, the

³ Information sourced from <https://data.census.gov/>, accessed March 18, 2025.

⁴ Ibid.

⁵ Information sourced from NJTPA Plan 2050, Appendix E, “Demographic Forecasts”, <https://www.njtpa.org/plan2050>, accessed March 18, 2025.

Borough is located within the Highlands Region and, in compliance with the Amended FHA, incorporating the results of the Highlands build-out analysis into this HEFSP. The results of the build-out are in Chapter XI.

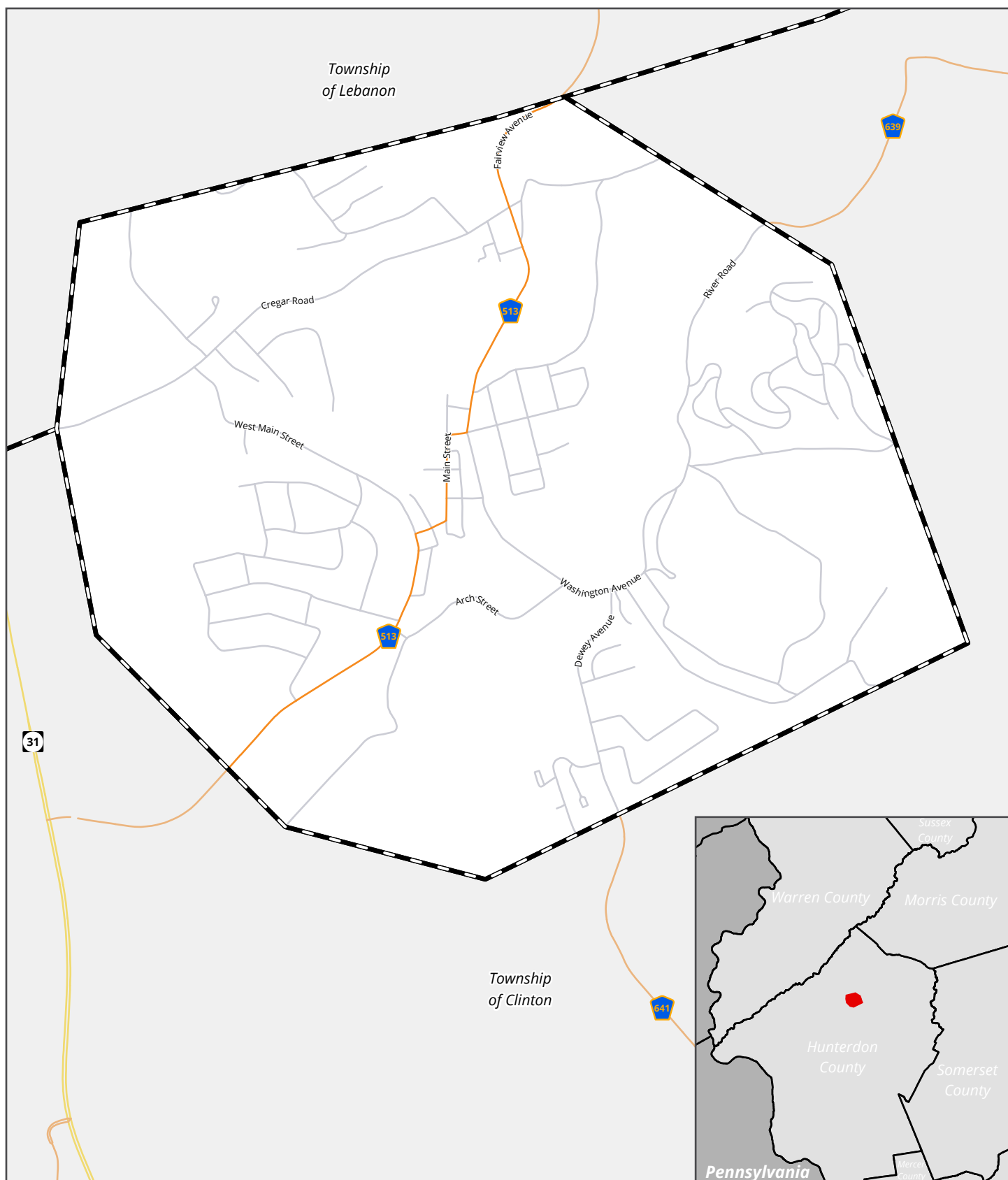
The chart below illustrates the Borough's four-part obligation.

Affordable Housing Obligation

	Rehabilitation	Prior Round 1987 - 1990	Third Round 1999 - 2025	Fourth Round 2025 - 2035
Obligation	4	27	90	31
RDP	--	--	19	--
Durational Adjustment	--	--	8	--
Highlands Build-Out	--	--	--	5
Adjusted Highlands Build-Out	--	--	--	21
Remaining Obligation That Must Be Satisfied	--	--	11	--

Borough Goal

It is the overall goal of the HEFSP, in combination with the Land Use Plan, to provide the planning context in which access to low- and moderate-income housing can be provided in accordance with the requirements of the Fair Housing Act and the laws of the State of New Jersey, while respecting the character, scale, density, and utility constraints of the Borough of High Bridge.



REGIONAL LOCATION
BOROUGH OF HIGH BRIDGE
HUNTERDON COUNTY, NEW JERSEY

0 0.1 0.2
 1 inch = 0.2 miles



This map was developed using GIS digital data from NJDEP, NJDOT, and NJGIN, but this secondary product has not been verified and is not state-authorized.

May 2, 2025
 HIB0185

HOUSING ELEMENT

Borough of High Bridge

II. Content of Housing Element

The Amended Fair Housing Act requires that “the housing element be designed to achieve the goal of access to affordable housing to meet present and prospective housing needs, with particular attention to low- and moderate-income housing”. As per the Municipal Land Use Law (“MLUL”), specifically NJSA 52:27D-310, a housing element must contain at least the following items:

- 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 conducting this 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 multi-generational 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.52D-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.

Chapters III. through IX. address a. through i. above except for the determination of the Borough's affordable housing obligation and the Highlands Council. High Bridge's four-part obligation is discussed in Chapter XI. Additionally, High Bridge is within the jurisdiction of the Highlands Council and, as a result, Chapter XV is dedicated to the Highlands Council Compliance.

III. High Bridge's Population Demographics

The Borough of High Bridge's population saw rapid growth through the 1970s. During the 1960s, High Bridge gained 458 new residents followed by 829 new residents during the 1970s. However, since 1990, the Borough's population has decreased by over 100 residents each decade. As of the 2020 Census, the population of High Bridge was 3,546, which is 340 residents less than its peak of 3,886 in 1990. See the table below for additional details.

Population Growth

Year	Population	Change	Percent
1940	1,781	--	--
1950	1,854	73	4.1%
1960	2,148	294	15.9%
1970	2,606	458	21.3%
1980	3,435	829	31.8%
1990	3,886	451	13.1%
2000	3,776	-110	-2.8%
2010	3,648	-128	-3.4%
2020	3,546	-102	-2.8%

Source: 2010 & 2020 Census Table P1; New Jersey Population Trends, 1790 to 2000,

<https://www.nj.gov/labor/labormarketinformation/assets/PDFs/census/2kpub/njsdcp3.pdf>

The NJTPA projects that the Borough's population will grow to 3,690 residents by 2050 from their baseline 2015 population of 3,625. This represents an increase of 65 residents, or an average increase of approximately two residents annually over 35 years. However, as noted above, the Borough's estimated population according to the 2023 ACS is 3,584, which is 106 less than projected by the NJTPA. This translates to an average annual increase of approximately five residents over the next 27 years.

Population Projection

Year	Population	Change	Percent
2015	3,625	---	---
2020	3,546	-79	-2.2%
2050	3,690	144	4.1%

Source: NJTPA Plan 2050, Appendix E, 2050 Demographic Forecasts,

<https://www.njtpa.org/plan2050>; 2020 Census Table P1

Age Distribution of Population

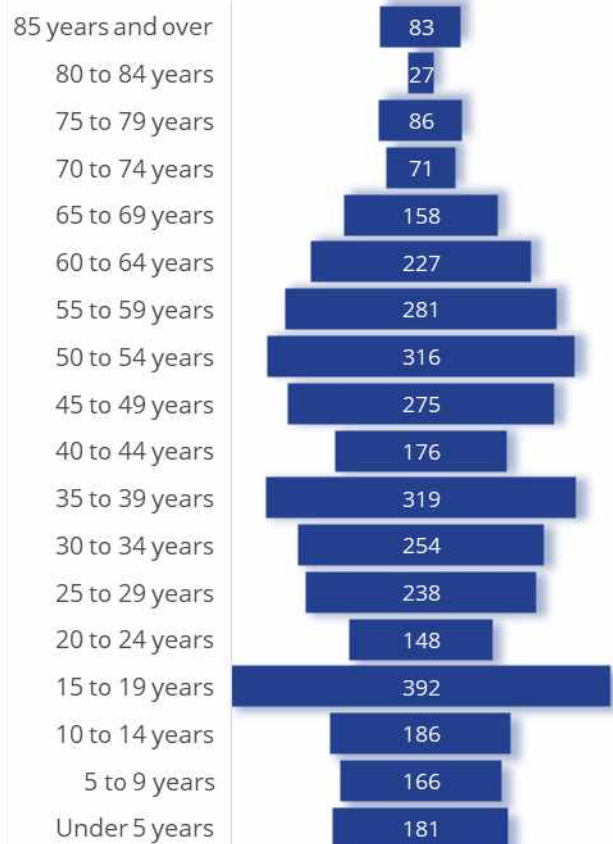
The 2023 ACS estimates just 11.9% of High Bridge's population was 65 years or older, while 25.8% of the population was 19 years or younger. The largest age cohort was estimated to be those aged 15 to 19 years, which comprised 10.9% (392) of the Borough's population. Residents aged 35 to 39 years comprised the second-largest age cohort at 8.9% (319) of the population, followed closely by those aged 50 to 54 years at 8.8% (316) of the population. The median age was estimated at 38.4 years in the 2023 ACS. See the table and chart on the following page for further details.

Population by Age Cohort

Age	Total	Percent
Under 5 years	181	5.1%
5 to 9 years	166	4.6%
10 to 14 years	186	5.2%
15 to 19 years	392	10.9%
20 to 24 years	148	4.1%
25 to 29 years	238	6.6%
30 to 34 years	254	7.1%
35 to 39 years	319	8.9%
40 to 44 years	176	4.9%
45 to 49 years	275	7.7%
50 to 54 years	316	8.8%
55 to 59 years	281	7.8%
60 to 64 years	227	6.3%
65 to 69 years	158	4.4%
70 to 74 years	71	2.0%
75 to 79 years	86	2.4%
80 to 84 years	27	0.8%
85 years and over	83	2.3%
Total	3,584	100%

Source: 2023 ACS Table S0101

Population by Age Cohort



Household Size & Type

According to the 2023 ACS, High Bridge had 1,475 households. A majority were married-couple households, which comprised just over 52% of all households. Of those, 428 had children under 18 years old. Male householders with no spouse present comprised 20.5% of all households, while female householders with no spouse present comprised only 17%. Of all households with no spouse present, 39 had children under the age of 18 (2.6%), while 367 were living alone (24.9%). See the table on the following page for complete details.

Household Type

Type	Number	Percent
Married-couple	769	52.1%
with children under 18	428	29.0%
Cohabiting couple	152	10.3%
with children under 18	13	0.9%
Male householder, no spouse	303	20.5%
with children under 18	14	0.9%
living alone	214	14.5%
Female householder, no spouse	251	17.0%
with children under 18	25	1.7%
living alone	153	10.4%
Total	1,475	100%

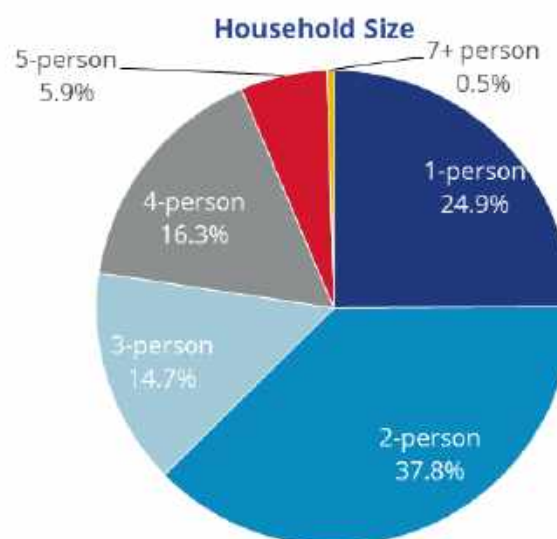
Source: 2023 ACS Table DP02

The ACS also provides data on household size. The most common household size in High Bridge was estimated to be two-person households, which comprised 37.8% of households in 2023. One-person households comprised the second-largest number of households at just under 25%. Finally, four-person households comprised 16.3% of the 1,475 households in High Bridge. It should be noted that seven households contained seven or more people. The table and pie chart below graphically illustrate the household size composition in High Bridge. Additionally, the 2023 ACS estimated the average household size at 2.43 persons, which is slightly less than the 2.57 persons reported in the 2010 Census.

Household Size

Size	Total	Percent
1-person	367	24.9%
2-person	557	37.8%
3-person	217	14.7%
4-person	240	16.3%
5-person	87	5.9%
6-person	0	0.0%
7+ person	7	0.5%
Total	1,475	100%

Source: 2023 ACS Table B11016



Income & Poverty Status

The 2023 ACS estimated the median household income for the Borough of High Bridge to be \$116,424, which is less than Hunterdon County's but more than the State's. Similarly, the median family income for High Bridge was estimated at \$131,282, which is \$35,000+ below the County's and \$7,000+ greater than the State's. Finally, the Borough's per capita income was estimated at \$54,651,

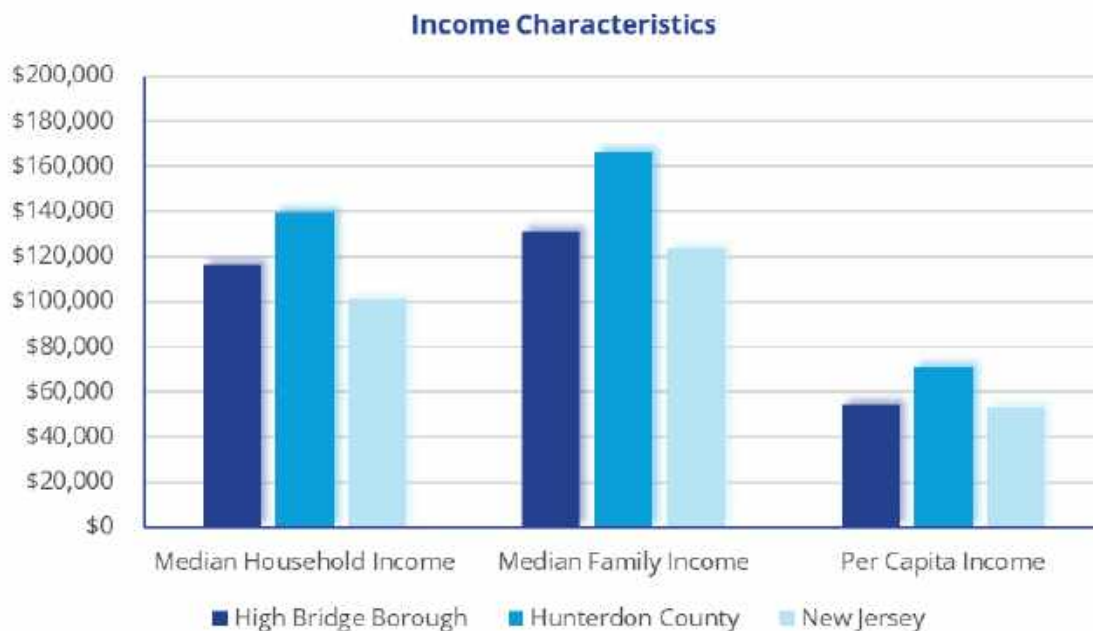
which is less than the County's but more than the State's. Based on this data, residents of High Bridge represent a middle-ground between the high incomes of Hunterdon County and the median State incomes.

The ACS also provides data on poverty rates of individuals and families. High Bridge's poverty rate for individuals was estimated at 3.8%, which is less State's, but the same as the County's. The Borough's poverty rate for families was estimated at 3.3%, which is only 1% more than the County's and less than the State's by 3.7%. The table and bar chart below provide a comparison of income and poverty characteristics.

Income and Poverty Characteristics

Income Type	High Bridge Borough	Hunterdon County	New Jersey
Median Household Income	\$116,424	\$139,453	\$101,050
Median Family Income	\$131,282	\$166,462	\$123,892
Per Capita Income	\$54,651	\$71,070	\$53,118
Poverty Status (Percent of People)	3.8%	3.8%	9.8%
Poverty Status (Percent of Families)	3.3%	2.3%	7.0%

Source: 2023 ACS Table DP03



According to the 2023 ACS, nearly 19% of households in High Bridge (277) earn over \$200,000 annually. Household earning \$100,000 or more annually were estimated to include 875 households or 59.3% of all households in High Bridge. Over 65% of household in Hunterdon County earned at least \$100,000 annually, including 31.4% earning more than \$200,000. Households in New Jersey earning \$100,000 or more according to the 2023 ACS included 50.5% of households. It should be

noted that only 14.3% of households in High Bridge earned less than \$50,000. See the table below for additional details.

Household Income

Income Range	High Bridge Borough		Hunterdon County		New Jersey	
	Total	Percent	Total	Percent	Total	Percent
Less than \$10,000	20	1.4%	1,136	2.3%	140,262	4.0%
\$10,000 to \$14,999	11	0.7%	477	0.9%	99,362	2.9%
\$15,000 to \$24,999	50	3.4%	1,571	3.1%	175,402	5.0%
\$25,000 to \$34,999	10	0.7%	1,443	2.9%	184,753	5.3%
\$35,000 to \$49,999	120	8.1%	2,852	5.7%	276,601	8.0%
\$50,000 to \$74,999	208	14.1%	5,355	10.6%	448,192	12.9%
\$75,000 to \$99,999	181	12.3%	4,639	9.2%	397,939	11.4%
\$100,000 to \$149,999	344	23.3%	9,473	18.8%	627,526	18.0%
\$150,000 to \$199,999	254	17.2%	7,553	15.0%	407,723	11.7%
\$200,000 or more	277	18.8%	15,823	31.4%	720,595	20.7%
Total	1,475	100%	50,322	100%	3,478,355	100%

Source: 2023 ACS Table DP03

IV. High Bridge's Housing Demographics

Housing Type

The 2023 ACS estimated the Borough's housing stock at 1,485 units. Single-family detached dwellings comprised most of the housing stock with 1,030 units or 69.4% of all dwellings. One-unit attached dwellings (e.g. townhomes) comprised 196 units (13.2%), while two-family dwellings comprised 117 units (7.9%) of the housing stock. The Borough contains 76 multi-family units (5.1%) in buildings containing five or more dwelling units. It should be noted that the 2023 ACS estimated 25 dwellings to be mobile homes. See the table below for details. Of the estimated 1,485 units in 2023, 30 units or 2% of the housing stock is affordable.

Housing Units in Structure		
Structure	Number of Units	Percent
1-unit, detached	1,030	69.4%
1-unit, attached	196	13.2%
2 units	117	7.9%
3 or 4 units	41	2.8%
5 to 9 units	45	3.0%
10 to 19 units	31	2.1%
20 or more units	0	0.0%
Mobile Home	25	1.7%
Other (boat, RV, van, etc.)	0	0.0%
Total	1,485	100%

Source: 2023 ACS Table DP04

Occupancy Status

Of the 1,485 residential units, 1,475 units, or 99.3% of the housing stock, was occupied. This includes 1,167 owner-occupied units and 308 rental units. A total of ten units were identified as "other" vacant units. See the table on the following page for details.

The 2023 ACS estimated the average household size in High Bridge was 2.43 persons, while the average family size was 2.99 persons. Comparing tenure, the average owner-occupied household was 2.59 persons, while the average renter-occupied household was 1.83 persons.

Occupancy Status

Status	Units	Percent
Occupied Total	1,475	99.3%
Owner Occupied	1,167	79.1%
Renter Occupied	308	20.9%
Vacant Total	10	0.7%
For rent	0	0.0%
Rented, not occupied	0	0.0%
For Sale	0	0.0%
Sold, not occupied	0	0.0%
Seasonal	0	0.0%
For migrant workers	0	0.0%
Other	10	100.0%
Total	1,485	100%

Source: 2023 ACS Tables DP04 & B25004

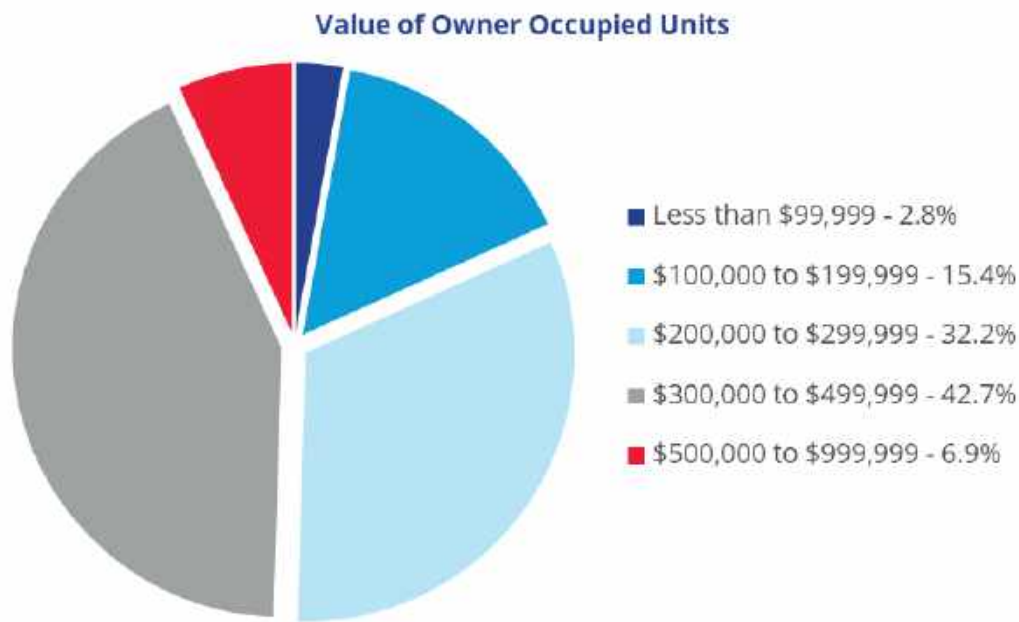
Value & Rent of Housing Stock

The 2023 ACS provided estimates for owner-occupied housing units in High Bridge. According to the data, a majority of homes in the Borough were worth between \$300,000 and \$499,999 (42.7%). Homes worth between \$200,000 and \$299,999 comprised 32.2% of the owner-occupied housing units, while 15.4% of homes were estimated to be worth between \$100,000 and \$199,999. Only 6.9% of homes (80 units) were valued between \$500,000 and \$999,999, while no homes were estimated to be worth more than \$1 million. The median home value estimated in the 2023 ACS was \$298,600. See the table below and the chart on the following page for details.

Value of Owner Occupied Units

Value	Number of Units	Percent
Less than \$99,999	33	2.8%
\$100,000 to \$199,999	180	15.4%
\$200,000 to \$299,999	376	32.2%
\$300,000 to \$499,999	498	42.7%
\$500,000 to \$999,999	80	6.9%
\$1,000,000 or more	0	0.0%
Total	1,167	100%
Median Value	\$298,600	

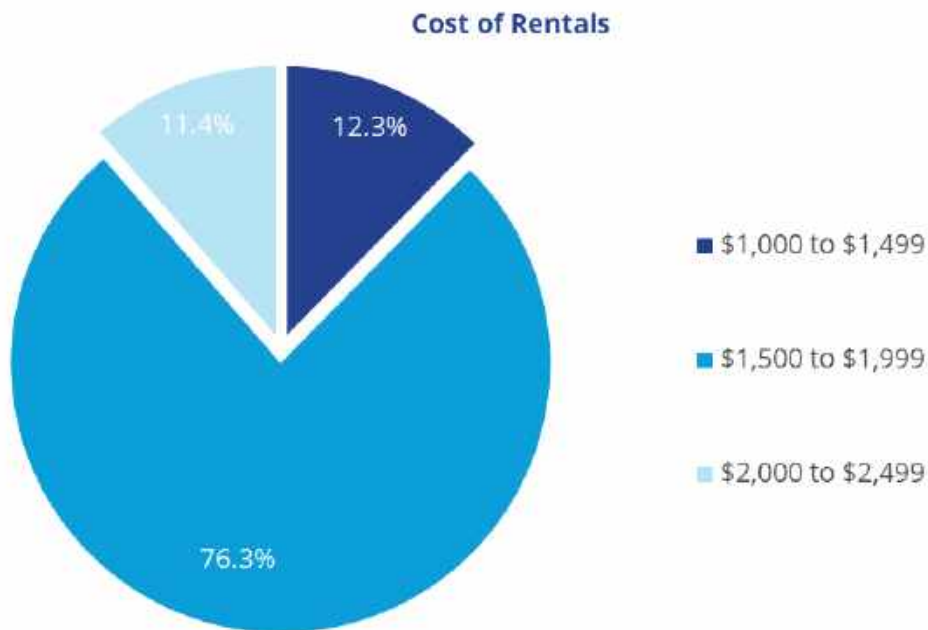
Source: 2023 ACS Table DP04



The median rent in the Borough was estimated at \$1,747 per the 2023 ACS. Looking at the rent ranges, over three quarters of the Borough’s rental units fell between \$1,500 and \$1,999 per month (76.3%). Units that cost between \$1,000 and \$1,499 comprised only 12.3% of rentals (38 units), while 11.4% (35 units) cost between \$2,000 and \$2,499 per month. See the table below and the chart on the following page for more information.

Cost of Rentals		
Cost	Number of Units	Percent
Less than \$1,000	0	0.0%
\$1,000 to \$1,499	38	12.3%
\$1,500 to \$1,999	235	76.3%
\$2,000 to \$2,499	35	11.4%
\$2,500 to \$2,999	0	0.0%
\$3,000 or more	0	0.0%
No rent paid	0	0.0%
Total	308	100%
Median (in dollars)		\$1,747

Source: 2023 ACS Table DP04



Condition and Age of Housing Stock

The Census does not classify housing units as standard or substandard, but it can provide an estimate of the substandard housing units that are occupied by low- and moderate-income households. However, most of the Census indicators available at the municipal level indicate a sound housing stock. All but seven homes within High Bridge contain complete plumbing facilities. An estimated seven homes lack complete kitchen facilities. See the table below for additional details.

Condition of Housing Stock		
Condition	Number of Units	Percent
Lack of complete plumbing	7	0.47%
Lack of complete kitchen	7	0.47%
Lack of telephone service	0	0.0%
Lack of adequate heat	0	0.0%
Total Occupied Housing Units	1,475	0.95%

Source: 2023 ACS Table DP04

Housing with 1.01 or more persons per room (excluding bathrooms and kitchens) is an index of overcrowding as defined by the U.S. Department of Housing and Urban Development.⁶ According to the 2023 ACS, all of the Borough’s 1,475 occupied housing units contained 1.00 or less persons per room.

⁶ <https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks/overpayment-payment-and-overcrowding#:~:text=The%20U.S.%20Census%20defines%20an,room%20are%20considered%20severely%20overcrowded>. Accessed April 3, 2025.

Occupants Per Room

Occupants	Number of Units	Percent
1.00 or less	1,475	100.0%
1.01 to 1.50	0	0.0%
1.51 or more	0	0.0%
Total	1,475	100%

Source: 2023 ACS Table DP04

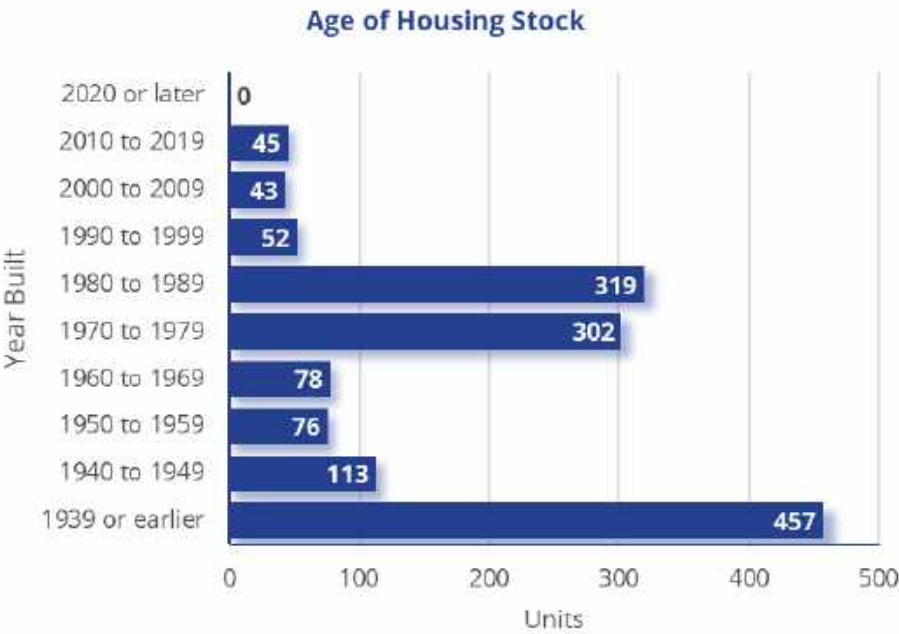
The table below and bar graph on the following page provide the 2023 ACS estimates for the age of housing units in High Bridge. An estimated 724 units, or 48.8%, of the Borough's housing stock were constructed prior to 1970 with over 30% being constructed prior to 1940. Residential development in High Bridge boomed during the 1970s and 1980s as an estimated 41.8% of the Borough's housing stock was constructed during this era. Since 1990, only 140 homes have been constructed. Despite the age of the housing stock, the Borough's Rehabilitation Obligation is only 4 units, reflecting the relatively good condition of these older homes.

It should be noted that the "2020 or later" line should be called "2020 through 2023". Otherwise, the category name is misleading to those reviewing the data.

Age of Housing Stock

Year Built	Number of Units	Percent
1939 or earlier	457	30.8%
1940 to 1949	113	7.6%
1950 to 1959	76	5.1%
1960 to 1969	78	5.3%
1970 to 1979	302	20.3%
1980 to 1989	319	21.5%
1990 to 1999	52	3.5%
2000 to 2009	43	2.9%
2010 to 2019	45	3.0%
2020 or later	0	0.0%
Total	1,485	100%

Source: 2023 ACS Table DP04



V. High Bridge's Employment Demographics

The 2023 ACS estimated that High Bridge had 2,148 residents over the age of 16 in the workforce. Of those, 2,023 (94.2%) were employed, which translates to a 5.8% unemployment rate. A majority of workers were private wage and salary worker (70.2%). However, 17.3% were workers employed by the government and 6.7% were self-employed. See the table below for details.

Class of Workers

Class	Workers	Percent
Private wage and salary workers	1,508	70.2%
Government workers	371	17.3%
Self-employed workers	144	6.7%
Unpaid family workers	0	0.0%
Total employed residents	2,023	94.2%
Total unemployed residents	125	5.8%
Total residents in workforce	2,148	100%

Source: 2023 ACS Table DP03

Occupational Characteristics

The 2023 ACS estimated 910 workers were employed in management, business, science, and arts fields, which represents 45% of the Borough's employed residents. Sales and office workers totaled 21% of employed residents, while 12.8% were employed in natural resources, construction, and maintenance jobs. See the table below for details.

Occupation of Employed Population

Occupation	Workers	Percent
Management, business, science, & arts	910	45.0%
Service	240	11.9%
Sales & office	424	21.0%
Natural resources, construction, & maintenance	259	12.8%
Production, transportation, & material moving	190	9.4%
Total	2,023	100%

Source: 2023 ACS Table DP03

Employment Projections

NJTPA's Plan 2050 estimates that the number of available jobs in High Bridge will increase from 906 reported in 2015 to 924 in 2050. This represents an increase of 18 jobs, or an average annual increase of 0.51 jobs annually. However, as detailed in the following section, the New Jersey Department of Labor and Workforce Development estimated a total of 538 jobs in High Bridge in 2023, which is 386 less than projected by NJTPA. Utilizing 538 as a starting point, roughly 14 new jobs would need to be created within the Borough each year for the next 27 years.

Employment Projection

Year	Jobs	Change	Percent
2015	906	---	---
2050	924	18	2.0%

Source: NJTPA Plan 2050, Appendix E, 2050 Demographic Forecasts, <https://www.njtpa.org/plan2050>

In-Place Employment By Industry

New Jersey's Department of Labor and Workforce Development ("NJDLWD") is the entity that reports on employment and wages within the State of New Jersey through the Quarterly Census of Employment and Wages ("QCEW"). The latest Municipal Report was completed in 2023. According to the data, there were 205 private sector jobs within the Borough, which were provided by an average of 26 employers. It should be noted that the Municipal Report redacted data from multiple private-sector industries for not meeting publication standards (construction, manufacturing, retail trade, etc.) The "Private Sector Total" row in the table on the following page provides the totals for the reported data only. However, the 2023 QCEW document reported that High Bridge had an average of 538 private-sector jobs provided by 60 employers, including the redacted data. It should be noted that the QCEW data reflects employment within High Bridge, regardless of where the employee lives.

Based on the 2023 QCEW data provided, the professional/technical industry contained the largest number of jobs in the Borough with an average of 68 jobs (21.7%). These jobs were provided by six employers, which is the second-largest industry of employers in High Bridge. The "other services" industry had eight employers, which was the highest, but the least number of average jobs (12). The accommodations/food industry had the second-highest jobs and third-highest employers with an average of 60 jobs (19.2%) and five employers. In the public sector, the 2023 QCEW Municipal Report indicated that there was one federal government employer, which had an average of only nine employees and two local government employers, which had an average of 99 jobs. This included one local government education employer providing an average of 61 jobs. See the table on the following page for data on each industry sector.

Private and Public Sector Employment (2023)

Industry	Establishments		Employees		Annual Wages
	Total	Percent	Total	Percent	
Construction	-	-	-	-	-
Manufacturing	-	-	-	-	-
Wholesale Trade	4	13.8%	38	12.1%	\$56,876
Retail Trade	-	-	-	-	-
Transportation/Warehousing	-	-	-	-	-
Information	-	-	-	-	-
Finance/Insurance	-	-	-	-	-
Real Estate	-	-	-	-	-
Professional/Technical	6	20.7%	68	21.7%	\$100,259
Admin/Waste Remediation	-	-	-	-	-
Health/Social	-	-	-	-	-
Arts/Entertainment	3	10.3%	27	8.6%	\$45,254
Accommodations/Food	5	17.2%	60	19.2%	\$14,856
Other Services	8	27.6%	12	3.8%	\$30,471
Unclassifieds	-	-	-	-	-
Private Sector Total	26	90%	205	65%	\$49,543
Federal Government	1	3.4%	9	2.9%	\$72,324
Local Government	2	6.9%	99	31.6%	\$69,204
Local Government Education	1	3.4%	61	19.5%	\$48,579
Public Sector Total	3	10%	108	35%	\$63,369

Source: The table values above are sourced from the NJDLWD's QCEW 2023 Municipal Report. It is noted that this Report has redacted multiple private sector industries for not meeting the publication standard. Therefore, the Private Sector Totals row has been calculated by this office using the published numbers.

Travel Time to Work

The 2023 ACS collected data regarding employed resident's commute time. The most common commute time was between 20 and 24 minutes, which was made by 269 workers (16.4%). A commute between 45 and 59 minutes followed close behind with 263 workers (16%). Rounding off the top three was a commute of 15 to 19 minutes, which was reported by 182 workers (11.1%). The mean travel time was estimated at 35.7 minutes. It should be noted that 228 workers (13.9%) reported a commute of more than one hour. Additionally, 354 workers, or 17.8% of the Borough's employed residents, reported working from home. See the table on the following page for additional details.

Commute Time

Travel Time (minutes)	Workers	Percent
Less than 5	27	1.6%
5 to 9	68	4.1%
10 to 14	89	5.4%
15 to 19	182	11.1%
20 to 24	269	16.4%
25 to 29	114	7.0%
30 to 34	166	10.1%
35 to 39	61	3.7%
40 to 44	173	10.5%
45 to 59	263	16.0%
60 to 89	147	9.0%
90 or more	81	4.9%
Total	1,640	100.0%

Source: 2023 ACS Table B08303

VI. Projection of Housing Stock

As per the MLUL, specifically NJSA 52:27D-310, a housing element must contain 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.

The DCA Division of Codes and Standards' website provides data on building permits, certificates of occupancy ("CO"), and demolition permits for both residential and non-residential development through the New Jersey Construction Reporter. This database contains permit and CO information that is submitted by municipal construction officials across the State each month. The Construction Reporter has information dating back to 2000, which can be used to show the Borough's historic development trends. However, data from 2013 and onward was reviewed to determine more recent trends.

As shown in the table below, the issuance of residential certificates of varies from year to year in the Borough of High Bridge. From 2013 to 2015, zero COs were issued, while 13 were issued in 2016 and nine in 2017. Of those, 19 were for multi-family units and three were for single- or two-family dwellings. Similarly, zero certificates were issued in 2019 and from 2021 through 2023, while 15 multi-family certificates of occupancy were issued in 2020. It should be noted that the Construction Reporter indicates no reports ("NR") were received from High Bridge during 2024. Since 2013, a total of 23 demolition permits were issued, which equates to a net development of 16 residential units.

Historic Trend of Residential Certificates of Occupancy & Demolition Permits (2013-2024)

	'13	'14	'15	'16	'17	'18	'19	'20	'21	'22	'23	'24	Total
COs Issued	0	0	0	13	9	2	0	15	0	0	0	NR	39
Demolitions	0	0	4	0	0	16	3	0	0	0	0	NR	23
Net Development	0	0	-4	13	9	-14	-3	15	0	0	0	NR	16

Source: NJDCA, Construction Reporter - Housing Units Certified and Demolition Permits, Yearly Summary Data

Projecting into the future, the Borough anticipates issuing 131 COs between 2025 and the end of the Fourth Round in 2035. Presently, the Borough does not have any new homes under construction nor any with zoning approval. Additionally, three units have been approved at 77 Main Street and 25 units have been approved at 1 Main Street (this site has commenced construction). Furthermore, there is a pending Planning Board application for the redevelopment of 100 West Main Street into a 98-unit multi-family building. Projected residential development was based on historic development patterns as shown in the previous table above.

Projection of Residential Development

	'25	'26	'27	'28	'29	'30	'31	'32	'33	'34	'35	Total
Projected Development	0	1	0	1	0	1	0	1	0	1	0	5
Approved Development with Permits Issued and Under Construction												
1 Main Street			25									25
Approved Development, Permits Not Yet Issued												
77 Main Street					3							3
Future Projects												
100 West Main Street				98								98
Total	0	1	25	99	3	1	0	1	0	1	0	131

Of the 131 new residences projected to be built between now and 2035, 25 are anticipated to be reserved for low- and moderate-income households. See the table below for further details.

Projection of Affordable Units

	'25	'26	'27	'28	'29	'30	'31	'32	'33	'34	'35	Total
Approved Development												
1 Main Street			5									5
Future Projects												
100 West Main Street				20								20
Total	0	0	5	20	0	0	0	0	0	0	0	25

VII. Capacity for Fair Share

This chapter of the HEFSP provides the following information as required by the rules:

- The Borough's capacity to accommodate its affordable housing needs.
- 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.
- Lands of developers who have expressed a commitment to provide low- and moderate-income housing.
- The location and capacities of existing and proposed water and sewer lines and facilities relevant to the proposed affordable housing sites.

Land Capacity

High Bridge's capacity to accommodate its present and prospective affordable housing need is determined by three components – available land, water availability/capacity, and sewer availability/capacity. Note that land development is limited by parcel size, easements (conservation, sewer, water, etc.), municipal regulations, and a variety of environmental features. In total, 1,212.81 acres of High Bridge, or 77.97% of the Borough's 1,555.43 acres, are encumbered by at least one environmentally sensitive area. Environmental constraints within the Borough of High Bridge include:

- Waterbodies – 32.12 acres (2.07% of the Borough's area), which includes 17.7 acres of Lake Solitude and 12.3 acres of the South Branch of the Raritan River.
- 300-foot Category 1 ("C1") stream buffer – 434.6 acres (27.94% of the Borough's area)
- Wetlands – 54.59 acres (3.51% of the Borough's area)
- 150-foot Wetlands Buffer (excluding wetlands area) – 121.6 acres (7.82% of the Borough's area)
- FEMA Special Flood Hazard Area Zone AE – 94.05 acres (6.05% of the Borough's area), including 55.68 acres within the Floodway.
- Slopes greater than 15% - 613.15 acres (39.42% of the Borough's area)
- State Threatened species habitat (Landscape Rank 3) – 389.98 acres (24.69% of the Borough's area)
- State Endangered species habitat (Landscape Rank 4) – 332.83 acres (21.4% of the Borough's area)
- Highlands Open Water Protection Area ("OWPA") – 639.84 acres (41.14% of the Borough's area)
- Highlands Riparian Area – 595.9 acres (38.31% of the Borough's area)

In addition, the Borough is located within the Highlands Region and is a fully conforming municipality. Therefore, development within the Borough is also controlled and limited by the

Highlands Regional Master Plan. As described in Chapter XI., the Borough has prepared a build-out study and determined the build-out to be 5 for the Borough.

Utility Capacity

As noted in the prior section, utility capacity impacts a community's ability to accommodate its present and prospective affordable housing need. Most of the Borough is served by public water and sewer. The Borough of High Bridge sends its wastewater to the Town of Clinton for processing. High Bridge is permitted a total of 402,000 gallons per day ("GPD"). Of that total, there are three contract users, Voorhees High School, Spruce Run Recreational Area and Voorhees State Park, who are reserved 63,720 GPD. This leaves the Borough with 338,280 GPD.

According to the Borough Engineer, as of December 2024, there was 64,225 GPD remaining. A total of 24,450 GPD are reserved for the redevelopment occurring at 1 Main Street and 100 West Main Street. It should be noted that the entire Borough is in the sewer service area, but there are not sewer pipes throughout the Borough.

The Borough of High Bridge has its own Water Department that oversees potable water. According to a 2023 Water Allocation Permit Application Renewal from the Department of Environmental Protection, High Bridge has an allocation limit of 19.13 MGM ("million gallons per month"). The average monthly use as of 2023 was 10.521 MGM. Of this total, 15,385 GPD (0.00001069 MGM) are reserved for 1 Main Street and 100 West Main Street.⁷

Appropriate Locations for Affordable Housing

Land that is most appropriate for the construction of low- and moderate-income housing includes the following:

1. 100 West Main Street, identified as Block 26, Lot 16
2. 1 Main Street, identified as Block 29.02, Lot 4

Existing structures appropriate for conversion to affordable housing include ranch-style homes, which may be cost effective to buy and convert to an alternative living arrangement. As for structures suitable for rehabilitation, according to the Borough's Rehabilitation Obligation, 4 homes within the Borough are in need of a major system repair (e.g. roof, electric, plumbing, etc.).

Potential Affordable Housing Developers

1 Main Street was recently approved for an inclusionary development. Demolition of the site has occurred. 100 West Main Street has applied to the Planning Board to construct an inclusionary development. Beyond these two sites, no developers have approached the Borough with a concept plan or request to construct affordable housing.

Anticipated Development Patterns

Anticipated land use patterns within the Borough of High Bridge will most likely follow the established zoning map. High Bridge has four residential zones, which have a range of lot size requirements from 0.17 acres (7,500 square feet) to 2.41 acres (105,000 square feet). The Borough also has a downtown business zone along Main Street, which encompasses the Borough's

⁷ Email from William Burr, PE, Borough Engineer on April 30, 2025.

“downtown” area, a commercial zone at the western end of West Main Street and on Cregar Road, a mixed-use zone south of Arch Street along West Main Street, and an industrial zone along Washington Street. Zoning for open space is scattered throughout the Borough and includes the High Bridge Hills Golf Course, the Borough’s parks and recreational areas, and other open spaces. Finally, the Borough has a designated Area in Need of Redevelopment encompassing 100 West Main Street (Block 24, Lot 16), which is subject to the 100 West Main Street Redevelopment Plan. See the Zoning Map on page 29 for details. The Borough does not propose any changes to the existing zoning map.



VIII. Multigenerational Family Continuity Evaluation

P.L. 2024, c.2 amended various aspects of the Fair Housing Act. These amendments modified the mandatory components of a municipality's housing element. NJSA 52:27D-310g. has been added, which states "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)"

P.L. 2021, c.273 took effect on November 8, 2021. The law established the Multigenerational Family Housing Continuity Commission, which consists of a body of nine members. The duties of the Commission include the preparation and adoption of recommendations on how State government, local government, community organizations, private entities, and community members may most effectively advance the goal of enabling senior citizens to reside at the homes of their extended families, thereby preserving and enhancing multigenerational family continuity, through the modification of State and local laws and policies in the areas of housing, land use planning, parking and streetscape planning, and other relevant areas. The Law requires the Commission to report annually to the Governor on its activities, findings, and recommendations, if any, for State and local government. The Department of Community Affairs ("DCA") is required to provide staff services as may be needed for the Commission to carry out its responsibilities, including assembly of necessary information and statistics, and preparation of draft reports, analyses, and recommendations.

The State of New Jersey's website was reviewed on May 2, 2025. A search of the website revealed no webpage for the Multigenerational Family Housing Continuity Commission. As DCA is required to provide staff and research for the Commission, DCA's website was reviewed on May 2, 2025. DCA's website is silent regarding the Commission, its annual required reports, studies, and/or recommendations. Without recommendations from the Commission, High Bridge is unable to conduct an analysis of its ordinances and other local factors. Despite the absence of recommendations, it should be noted that there is nothing in High Bridge's zoning ordinance that prohibits senior citizens from residing at the home of their extended families.

IX. State Development & Redevelopment Plan Consistency

P.L. 2024, c.2 amended the Fair Housing Act to include a new requirement for housing elements. NJSA 52:27D-310i. reads "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."

The Draft State Development and Redevelopment Plan was approved by the State Planning Commission ("SPC") on December 4, 2024 and was released on December 6, 2024. The Office of Planning Advocacy ("OPA") conducted public hearings in each of New Jersey's 21 Counties between February 12, 2025 and April 16, 2025. Municipalities are tasked with completing Cross-Acceptance Response Template forms to determine a municipality's consistency with the Draft State Plan. The OPA anticipates collecting all Cross-Acceptance Response Template forms in the Summer of 2025. During this time, the OPA is accepting comments on the Draft Plan. The OPA anticipates releasing a Final Draft Plan and holding six additional public hearings in the Summer/Fall of 2025. The expected adoption of the Final Plan by the SPC is anticipated to be in the Winter of 2025.

As the document is draft, we cannot opine on consistency until the final version is adopted. High Bridge has not received guidance concerning water, wastewater, or multi-modal transportation from the State Planning Commission. Furthermore, High Bridge submitted comments to the Office of Planning Advocacy on March 7, 2025 regarding the draft plan that, if accepted, would modify the goals and policies.

FAIR SHARE PLAN

Borough of High Bridge

X. Fair Share Plan

Fair Share Plan is defined by the Amended Fair Housing Act as “the plan or proposal that is in a form which may readily be adopted, with accompanying ordinances and resolutions, pursuant to subsection f. of section 3 of P.L.2024, c.2 (C.52:27D-304.1), by which a municipality proposes to satisfy its obligation to create a realistic opportunity to meet its fair share of low- and moderate-income housing needs of its region and which details the affirmative measures the municipality proposes to undertake to achieve its fair share of low- and moderate-income housing, as provided in the municipal housing element, and addresses the development regulations necessary to implement the housing element, including, but not limited to, inclusionary requirements and development fees, and the elimination of unnecessary housing cost-generating features from the municipal land use ordinances and regulations.”

The remaining chapters of this report comprise the Fair Share Plan.

Content of Fair Share Plan

The Fair Share Plan contains the following information:

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

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

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

Regional Income Limits

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

with a gross household income equal to 30% or less of the median gross household income. High Bridge is located in Region 3, which contains Hunterdon, Middlesex, and Somerset Counties.

Using the Affordable Housing Professionals of New Jersey's latest chart on the regional income limits for Housing Region 3 in 2024, a four-person moderate income household is capped at \$116,960. Two-person moderate income households are capped at \$93,568, while two-person households could make up to \$58,480 to be considered a low-income household. The table below provides the median, moderate-, low-, and very-low-income limits for one-, two-, three-, and four-person households in Region 3.

2024 Regional Income Limits

Income	Household Size			
	1 Person	2 Person	3 Person	4 Person
Median	\$102,340	\$116,960	\$131,580	\$146,200
Moderate	\$81,872	\$93,568	\$105,264	\$116,960
Low	\$51,170	\$58,480	\$65,790	\$73,100
Very-Low	\$30,702	\$35,088	\$39,474	\$43,860

Source: https://ahpnj.org/member_docs/Income_Limits_2024_FINAL.pdf

Affordable Requirements

The four components that must be addressed by this plan are contained in the table below.

Affordable Housing Obligation

	Rehabilitation	Prior Round 1987 - 1990	Third Round 1999 - 2025	Fourth Round 2025 - 2035
Obligation	4	27	90	31
RDP	--	--	19	--
Durational Adjustment	--	--	8	--
Highlands Build-Out	--	--	--	5
Adjusted Highlands Build-Out	--	--	--	21
Remaining Obligation That Must Be Satisfied	--	--	11	--

As discussed in Chapter XI., High Bridge has conducted a Highlands build-out analysis, and those results indicate the Borough can build 5 affordable units. The Highlands build-out restricts not just the Fourth Round Obligation, but all affordable housing obligations. Build-out is a limit on development in the entire community, blind to past outstanding affordable housing obligations. Therefore, the unbuilt Third Round RDP, unbuilt Third Round Unmet Need, and Fourth Round Obligation are adjusted to a Highlands affordable housing obligation of 5.

Four credits and one bonus remain unbuilt from the Third Round RDP. 76 credits of Third Round Unmet Need remain outstanding. The difference between the build-out of 5 and the Fourth Round Obligation is 26. This totals 107 credits of Highlands build-out unmet need.

However, the Borough has an active redevelopment site that was not captured by the Highlands build-out analysis. Adding 16 units of said site to the Highlands build-out of 5, High Bridge has sufficient credits to achieve an adjusted Highlands Build-out of 21 units, which would modify the Highlands build-out unmet need to 86 as detailed in the following chapter.

XI. High Bridge's Affordable Housing Obligation

This chapter outlines the four-part affordable housing obligation High Bridge has been assigned.

Four-Part Obligation

Rehabilitation

High Bridge accepted DCA's Rehabilitation Obligation of 4 for the Fourth Round.

Prior Round (1987-1999)

High Bridge received Second Round Substantive Certification in 2004. The Borough had a 27-unit new construction obligation for the PRO. The 2004 Compliance Report contained the following formulas:

Minimum rental obligation:

$$= 25\% (\text{calculated need} - 1,000 \text{ unit cap} - \text{rehabilitation obligation})$$

$$= 25\% (32 - 0 - 24) = 2$$

Maximum age-restricted:

$$= 25\% (\text{precredited need} - \text{prior cycle credits} - \text{rehabilitation credits}) - \text{first round age restricted units}$$

$$= 25\% (51 - 6 - 5) - 0 = 10$$

Maximum Regional Contribution Agreement transfer:

$$= 50\% (\text{precredited need} - \text{prior cycle} - \text{rehabilitation credits}) - \text{any units transferred as a result of a previously approved RCA}$$

$$= 50\% (51 - 5 - 6) - 0 = 20$$

Third Round (1999-2025)

High Bridge has an RDP of 19 for the TRO that the Court approved to reduce by eight units through a Durational Adjustment. Therefore, the Borough has a Durationally Adjusted RDP of 11. However, the executed Settlement Agreement calculated the bonuses on the 19-unit RDP.

Minimum rental obligation:

$$= 25\% (\text{RDP})$$

$$= 25\% (19) = 5$$

Maximum age-restricted:

$$= 25\% (\text{RDP})$$

$$= 25\% (19) = 4$$

Fourth Round (2025-2035)

As indicated in the April 8, 2025 Order setting the Fourth Round obligations, the Borough's Fourth Round Obligation is 31.

The Amended FHA modified the micro-requirement formulas for the FRO, which are as follows:

- Minimum 50% of the actual affordable units (exclusive of any bonus credits) available to families
- Minimum 25% of the actual affordable units (exclusive of any bonus credits) as rental units
- Half of the above as family rental units
- Maximum 30% of the affordable units exclusive of any bonus credits) as age-restricted housing
- Maximum 25% of the obligation as bonus credits

The table below illustrates the micro-requirement formulas for the adjusted Highlands Build-out number which is discussed in the following section.

Fourth Round Micro Requirements

21	Amended Highlands Build-Out		
Calculation	Rounding	Percent	Category
8.0	8.0	50%	Minimum Families with Children (non-restricted, excluding bonuses)
4.0	4.0	25%	Minimum Rentals (excluding bonuses)
2.0	2.0	12.5%	Minimum half of the above reserved for families with children
5.3	5.0	25%	Maximum Bonuses
4.8	4.0	30%	Maximum Senior Credits (excluding bonuses)

Highlands Build-out Analysis

The Amended FHA describes the required elements of a housing plan. Subsection h. of NJSA 52:27D-310 states:

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 [in the Housing Element and Fair Share Plan] 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.

The Highlands Council issued a Highlands Municipal Build-Out Update dated November 1, 2024. The document outlines the process the Council utilized to determine parcels eligible for development. Utilizing MOD-IV tax data, the Council included Class 1 (Vacant) and Class 3B (Farmland Assessed) properties with 0.83 acres or greater as available for development. Parcels

with a public, 15C, or 15F classification where 0.83 acres or greater were available for development were also included.

The Highlands Council provided conforming municipalities with access to an online GIS portal hosted through Arc GIS to evaluate identified properties as well as any properties that did not have a tax code classification. For High Bridge, 5 properties required municipal review. The portal review required confirmation of sewer service, MOD-IV tax class, preservation status, and whether or not the site is developable. Each of the 5 parcels required review and sign off by this office as to whether sites were or were not developable based on Highlands' criteria. Any changes to a lot's developability required rationale to be entered into the portal.

Our review revealed that 3 parcels were common areas owned by various HOAs within the Borough. These areas are not developable. Additionally, another lot did not have street frontage, and the last lot had a 3A classification. What the analysis did not include was a recently vacant lot (Block 29.02, Lot 4) as a result of a demolition, which this office added into the analysis.

Thereafter, the Highlands Council provided a spreadsheet with all the parcels within the Borough that could be sorted by those that are considered developable. This table revealed that only one lot is vacant and developable within High Bridge. This property totals 0.67 acres.

The attached table lists the vacant and developable property. Please note that the block, lot, address, total acres, and developable acres are sourced from the Highlands Council table. This office then added the remaining data. (See Appendix G for the build-out table and report.)

In terms of the interplay between affordable housing obligations and the build-out, the Highlands Guidance Document stresses the long historical interaction between the Council on Affordable Housing ("COAH") standards and affordable housing. This includes, the Regional Master Plan, COAH's second attempt at Round 3 rules, Executive Order 114, a Memorandum of Understanding ("MOU") between the Highlands and COAH, a 2009 guidance document from the Highlands and the 2011 Appellate Division decision upholding the Regional Master Plan ("RMP"), Executive Order 114 and the MOU – but invalidating, on non-substantive grounds, the Highlands Guidance Document and 2009 COAH resolution as rulemaking that would have had to go through the administrative rule making process. Not mentioned in the Guidance Document is that, in addition to all of those documents, COAH's proposed 2014 regulations imposed a "buildable limit" on Highlands towns which corresponded to the Highlands Build Out numbers. COAH was rendered Moribund in 2015 and towns lost the benefit of the regional planning entity's interaction with COAH. This had significant consequences in Round 3 in the context of impacts on the RMP from an environmental perspective (the "Adverse Consequences").

On March 20, 2024, Governor Murphy signed amendments to the New Jersey Fair Housing Act into law. The Amended FHA made clear that the Adverse Consequences would need to be avoided in Round 4 and beyond in order to protect the State's drinking water and the environmental features of the Highlands. To effectuate renewed and legitimate protections in the Highlands, the Amended FHA provided for a lower "off-the-top" allocation in the Highlands by providing a 0-weighting factor for developable land in the Preservation Area and Planning Areas outside of a sewer service area and the Existing Community Zone.

As part of the consideration of the Regional Master Plan in the regional allocation of need, the New FHA also renews the statutory requirement that Highlands municipalities specifically comply with

the Highlands Build-Out in the context of their Plans, see quoted text at the beginning of this section.

The only way to conform with the Highlands Build-Out in the HEFSP, in the context of affordable housing, is to adjust the off-the-top number downward so that inclusionary development would not exceed the build out. For example, if a Highland's town had a prospective need of 1,000, but a buildout of 500, then it would need to have an adjusted number of 100 so that it could zone for the build-out at 20% and achieve the yield. In addition, the municipality would consider: "opportunities for redevelopment of existing developed lands into inclusionary or 100 percent affordable housing, or both....that are consistent with the Highlands regional master plan".

That is precisely what the Highlands Guidance document envisions. The Highlands document provides that Build-out is effectively a cap on the amount of units that can be supported in the Borough. Since the FHA cannot require a municipality to spend its own money on compliance (and therefore cannot compel 100% projects), the only way to reconcile the build-out with the Amended FHA is assume a 20% set aside relative to the upward capacity for multi-family units in the build-out.

It should also be noted that the Highlands Municipal Build-Out Update states a minimum presumptive density of six units per acre based on developable acreage should be assumed. While this recommendation is blind to specific site conditions, the document does provide that the analysis should be done "within the parameters of sound land use planning, municipalities will generally have to determine appropriate densities for lands that have the potential to be serviced by public wastewater." Thus, the Highlands Build-out also requires an analysis of suitability for multi-family use of at least five units.

Suitable is defined as a "site that is adjacent to compatible land uses, has access to appropriate streets...". Affordable housing must meet the four prong criteria of available, suitable, developable, and approvable. Therefore, vacant and developable sites surrounded by single-family detached neighborhoods that would not generate a Realistic Development Potential under COAH's regulations, were similarly not assigned the Highlands density of 6 units per acre and instead assigned the underlying Borough zone density.

As illustrated in the attached spreadsheet, the one vacant and developable parcel would generate a total of 25 units. Multiplying the site's yield by 20% results in a total affordable housing build-out of 5 affordable units. Therefore, the Borough of High Bridge's Highlands affordable housing build-out is 5.

However, the build-out does not consider redevelopment opportunities. As noted in Chapter VI., 100 West Main Street has a pending Board application for a 98-unit development. Multiplying 98 by 20% results in 20 additional affordable units. However, four of 100 West Main's units are already allocated to the TRO. Therefore, we proposing adding the remaining 16 units (to avoid double counting) to the build-out analysis. Therefore, the amended Fourth Round build-out would be 21.

The Highlands build-out restricts not just the Fourth Round Obligation, but all affordable housing obligations. Build-out is a limit on development in the entire community, blind to past outstanding affordable housing obligations. Therefore, the unbuilt Third Round Unmet Need and Fourth Round Obligation are adjusted to or capped at an amended Highlands affordable housing obligation of 21.

Build-Out Unmet Need

Four credits and one bonus remain unbuilt from the Third Round RDP. However, these five credits will be accomplished with the 100 West Main Street redevelopment. 76 credits of Third Round Unmet Need remain outstanding. The difference between the amended build-out of 21 and the Fourth Round Obligation is 10. This totals 86 credits of Highlands build-out "Unmet Need".

XII. Mechanisms & Credits

This chapter provides the existing and proposed mechanisms and credits for each of the four affordable housing obligations.

Existing Mechanisms & Credits

High Bridge has a total of 18 credits without controls, seven credits (including two bonus credits) of alternative living arrangement bedrooms, and seven credits of inclusionary units and four rental bonuses that exist on the ground today.

Rehabilitation Mechanisms & Credits

Rehabilitation must occur within the Round to count for credit. High Bridge operated a successful rehabilitation program in the Third Round, but none of those units count towards the Fourth Round Obligation.

Prior Round Mechanisms & Credits

High Bridge has three existing Prior Round mechanisms. All three mechanisms and their associated credits were listed in the 2017 Settlement Agreement with Fair Share Housing Center and approved by the 2018 Final Judgment of Compliance and Repose.

Credits without Controls

In 2004 High Bridge received Substantive Certification for its Second Round HEFSP. That approval included a “credits without controls” survey. Credits without controls are housing units that were created and occupied between April 1, 1980 and December 15, 1986. These units do not have affordability controls on them but were occupied (at the time of survey) by an affordable household. The rent or market value was required to be a price that was inexpensive for an affordable household. The final survey conducted by the Borough was reviewed by COAH, who determined that 18 of the submitted units were affordable and therefore High Bridge was eligible to receive 18 credits. According to the 2004 Compliance Report, Credits without Controls are eligible per NJAC 5:93-2.2.

Based on the information above, Credits without Controls is eligible for **18 credits**.

Development Resources Corporation

High Bridge has one group home. Development Resources Corporation operates a five-bedroom group home at 15 Stillwell Avenue. The facility serves very-low income developmentally disabled persons and is licensed by the Department of Human Services, Division of Developmental Disabilities. The most recent license can be found in Appendix H. The facility began operation in 1986 and is eligible for 5 credits pursuant to NJAC 5:93-5.8 (alternative living arrangement).

Based on the information above, Development Resources Corporation is eligible for **5 credits and 2 bonus credits** pursuant to NJAC 5:93-5.15(d).

38 Main Street

High Bridge Village, located at 38 Main Street, was built in 2014. The mixed-use building is located on Block 8, Lot 7 at the corner of Main Street and McDonald Street. The building includes retail

space on the first floor and seven apartments. One of the apartments is a 30-year deed restricted moderate-income family rental unit. Pursuant to NJAC 5:93-5.6 (inclusionary development), 38 Main Street is eligible for one credit. The development also qualifies for one rental bonus pursuant to NJAC 5:93-5.15(d).

Based on the above information, High Bridge Village is eligible for **1 credit and 1 bonus credit**.



Photo 1 – 38 Main Street

Third Round RDP Mechanisms & Credits

High Bridge has two existing Third Round mechanisms. Both mechanisms and their associated credits were listed in the 2017 Settlement Agreement with Fair Share Housing Center and approved by the 2018 Final Judgment of Compliance and Repose.

41 Center Street

On September 21, 2015 the Borough Zoning Board approved this multi-family residential development, known as the High Bridge Views project. It should be noted that this project has also been previously referred to as the Arbor's at High Bridge. Block 29.02, Lot 12 is located at 41 Center Street and is a short walk to the train station. The development contains 12 apartments in a three-story 12,200 plus square foot building. Two of the twelve apartments are reserved for affordable households. Both affordable units are one-bedroom units. The family rental units provide one low-income unit and one moderate-income unit. The affordable units have a 30-year deed restriction that commenced in 2016. Pursuant to NJAC 5:93-



Photo 2 – 41 Center Street

5.6 (inclusionary development), High Bridge Views is eligible for 2 credits. The development also qualifies for two rental bonuses pursuant to NJAC 5:93-5.15(d).

Based on the above information, High Bridge Views is eligible for **2 credits and 2 bonuses**.

20 Main Street

20 Main Street, also known as High Bridge Gateway, was built in 2017. This mixed-use building is located on Block 8, Lot 7 at 20 Main Street. The building includes one retail store and seven apartments. One of the seven apartments is a 30-year deed restricted moderate-income family rental unit. The deed restriction commenced in 2017. Pursuant to NJAC 5:93-5.6 (inclusionary development), 20 Main Street is eligible for one credit. The development also qualifies for one rental bonus pursuant to N.J.A.C. 5:93-5.15(d).

Based on the above information, 20 Main Street is eligible for **1 credit and 1 bonus credit**.



Photo 3 – 20 Main Street

Third Round Unmet Need Mechanisms & Credits

The below mechanism occurred after the Final Judgment was issued. This site is in the MUC Zone which was amended to permit inclusionary development as part of the FSHC Settlement Agreement.

81 West Main Street

Known as Riverview Village, this site encompasses Lots 13 and 14 of Block 30 and contains 0.958 acres. The site is located just north of the Borough's municipal complex. On January 7, 2019, the Planning Board/Board of Adjustment granted Riverview Village,



Photo 4 – 81 West Main Street

LLC Preliminary and Final Site Plan with D(1) use variance relief and "C" variance relief to construct a three-story, 15-unit inclusionary multi-family building. The Board's approval was memorialized via Resolution PB06-2019 on March 18, 2019 (see Appendix I for a copy of the Resolution). The 15-unit multi-family residential building generated a three-unit obligation. However, the developer worked with the Borough to provide one low-income, one-bedroom family rental on-site and deed restrict two units at an existing inclusionary mixed-use building at 20 Main Street (Block 29.01, Lot 3), which was also owned by the developer. The two affordable units at 20 Main Street include a moderate-income, two-bedroom family rental unit and a very-low-income, two-bedroom family rental unit. Riverview Village was constructed primarily in 2019 and received a CO in 2020. All three units have a 30-year deed restriction, which went into effect in 2020 (see Appendix I for a copy of the deed restriction for 81 West Main Street and 20 Main Street).

Based on the above information, 81 Main Street is eligible for **3 credits** pursuant to NJAC 5:95-5.6 (inclusionary development).

Fourth Round Mechanisms & Credits

High Bridge has no existing Fourth Round credits.

Summary of Existing Mechanisms & Credits

The Borough has a total of 36 existing credits as detailed in the table on the following page.

Existing Mechanisms & Credits

Mechanism	Credit Type	Tenure	Age-Restricted	Credit	Bonus	Total
<i>Prior Round Credits</i>						
Credits without Controls	Family	Sale	No	18	0	18
Development Resources Corporation	Alternative Living Arrangement	Rental	No	5	2	7
38 Main Street	Inclusionary	Rental	No	1	1	2
Total				24	3	27
<i>Third Round RDP Credits</i>						
41 Center Street	Inclusionary	Rental	No	2	2	4
20 Main Street	Inclusionary	Rental	No	1	1	2
Total				3	3	6
<i>Third Round Unmet Need Credits</i>						
81 West Main Street	Inclusionary	Rental	No	1	0	1
81 West Main Street at 20 Main Street	Inclusionary	Rental	No	2	0	2
Total				3	0	3

Proposed Mechanisms & Credits

The sections below describe the proposed mechanisms and credits to address the Borough's four-part affordable housing obligation.

Rehabilitation Mechanisms & Credits

The Borough proposes two mechanisms to address its 4-unit Rehabilitation Obligation.

Borough-sponsored Rehabilitation Program

The purpose of a rehabilitation program is to rehabilitate substandard housing units occupied by low- and moderate-income households. A substandard housing unit is defined as a unit with health and safety code violations that require the repair of a major system such as weatherization, a roof, plumbing (including wells), heating, electricity, sanitary plumbing (including septic systems), and/or load bearing structural system. Upon rehabilitation, housing deficiencies must be corrected, and the house must be brought up to code. The standard for evaluating rehabilitation activity shall be the local property maintenance code, or, if none is available, the BOCA Property Maintenance Code, in effect at the time of evaluation. The rehabilitation activity shall not include luxury improvements, the purchase of appliances (with the exception of stoves) or improvements that are strictly cosmetic. A rehabilitated unit is considered complete at the date of final inspection.

The Borough currently retains Community Action Services as its affordable housing administrator to operate the Borough's Third Round Rehabilitation Program. The Borough-sponsored program will comply with the requirements of NJAC 5:93-5.2. Funding for the program will come from the Affordable Housing Trust Fund account. The Borough will reserve at least \$10,000 per unit, which

must be repaid (with no interest) at the end of the ten-year affordability control term. The rehabilitations will be phased between now and 2035.

The current operating manual can be found in Appendix O. The rehabilitation program will be marketed through a combination of some, though not necessarily all, of the following: brochures, posters in prominent locations, posted on the website, notices in municipal tax bills, notices included in municipal publications, and informational meetings with civic and religious leaders, senior citizen groups, and fraternal organizations. The designated Administrative Agent will maintain files on each program applicant.

High Bridge will require at least ten-year controls on affordability on owner-occupied units and on rental units. The controls on affordability may be in the form of a lien filed with the appropriate property's deed. Rents in rehabilitated units may increase annually based on the standards in NJAC 5:93-9.15.

As per NJAC 5:93-5.2(h), High Bridge will spend and reserve the minimum of \$10,000 per unit for rehabilitation activity. It is anticipated that the Borough's Rehabilitation Program will be structured to encourage rehabilitation and continued occupancy. If a housing unit is sold prior to the end of the controls on affordability, the entire loan shall be recaptured and used to rehabilitate another housing unit.

The Borough is setting aside funding for **two rehabilitations** between July 1, 2025 and December 31, 2035. Based on the above, the Borough Rehabilitation Program would be eligible for crediting pursuant to NJAC 5:93-5.2.

County Housing Rehabilitation Program

The Hunterdon County Housing Rehabilitation Program is funded by the New Jersey DCA's Small Cities Program and managed by Hunterdon County staff. The goal is to maintain safe, accessible, and energy-efficient housing by helping eligible residents to correct code violations and other deficiencies in their homes.⁸ Any resident of an owner-occupied dwelling in Hunterdon County is eligible if they have resided in the County for at least one year, have not received funding from this program in the last three years, their property exhibits conditions that must be corrected in order to meet code standards, to prevent further deterioration, or safely access and occupy the home and whose income from all resources does not exceed the current HUD income guideline. Funding assistance is provided in the form of a non-interest bearing and deferred payment loan to cover the cost of eligible rehabilitation. Repayment of the loan is secured by a lien on the property and does not have to be paid until the sale or transfer of the property. Only homes that have an appraised value exceeding the amount of any prior mortgages and an additional lien for the cost of repairs will be considered for participation in this program.

High Bridge will advertise the County program through various means, at least one a year. The Borough anticipates that **two homes** will utilize the program. Based on the above information, this program is eligible for crediting pursuant to NJAC 5:93-5.2.

⁸ [Housing Rehabilitation Program | Hunterdon County, NJ](#), accessed April 9, 2025.

Third Round RDP Mechanisms & Credits

One mechanism is proposed and allocated towards the TRO's RDP. This mechanism and its associated credits were listed in the 2017 Settlement Agreement with Fair Share Housing Center and approved by the 2018 Final Judgment of Compliance and Repose.

100 West Main Street

100 West Main Street (identified as Block 24, Lot 16) is the former location of "Exact Level and Tool Manufacturing", a tool production plant that operated for 50 years. The company closed in the mid-1980s and since then the site has been neglected and has fallen into disrepair. On June 23, 2017, the Mayor and Council designated the Exact Tool property as an Area in Need of Redevelopment. The Borough then received grant money from the Highlands Council to prepare a Redevelopment Plan. The Exact Tool Redevelopment Plan was recommended for adoption by the Planning Board on March 19, 2018 and adopted via Ordinance 2018-012 by the Council on March 22, 2018.

The site contains 4.301 acres and was located in the MUC Mixed-Use Corridor Zone (see map on page 29). The property is surrounded by a variety of non-residential and residential uses. East of the property along West Main Street are single-family residential dwellings and a multi-family building. The Borough's municipal complex, which includes the Borough Hall, Borough Police Department and Emergency Squad is located across West Main Street to the south. A gasoline service station and automobile repair shop are southwest of the property. Single-family residential dwellings are adjacent to the remaining sides of the property. According to data from NJDEP and Highlands, the property does not contain any critical wildlife habitats or vernal pools, streams or open waters, or wetlands and is not within a flood zone. However, a majority of the site is located within the Highlands Riparian Area, while nearly a quarter acre is within the Highlands OWPA. The property is also within the 300-foot C1 stream buffer from the South Branch of the Raritan River, which generally coincides with the Highlands OWPA.

Furthermore, isolated area of slopes greater than 15% are present in the northwest corner of the property.

The 2018 Redevelopment Plan permits a variety of uses including multi-family residential. The maximum permitted residential density is eight units per acre. A full build-out of the site would produce 35 residential units. The Ordinance requires a 20% affordable housing set-aside. The 2017 Settlement Agreement with Fair Share Housing Center earmarked the site for 4 affordable units.



Photo 5 – 100 West Main Street

However, on September 12, 2024, the Mayor and Council Amended the Redevelopment Plan for the second time via Ordinance No. 2024-034. The Amendment eliminated the conditional use requirements for multi-family residential uses, permitting multi-family residential uses as-of-right. The permitted density was also increased from eight units per acre to 23 units per acre and elongated the required affordability controls from 30 to 40 years. Other amendments included modifications to the required front yard setback, maximum building height, residential parking requirement, elimination of the option to provide a payment in lieu for a fractional affordable unit, and architectural standards. See Appendix J for a copy of the Redevelopment Plan.

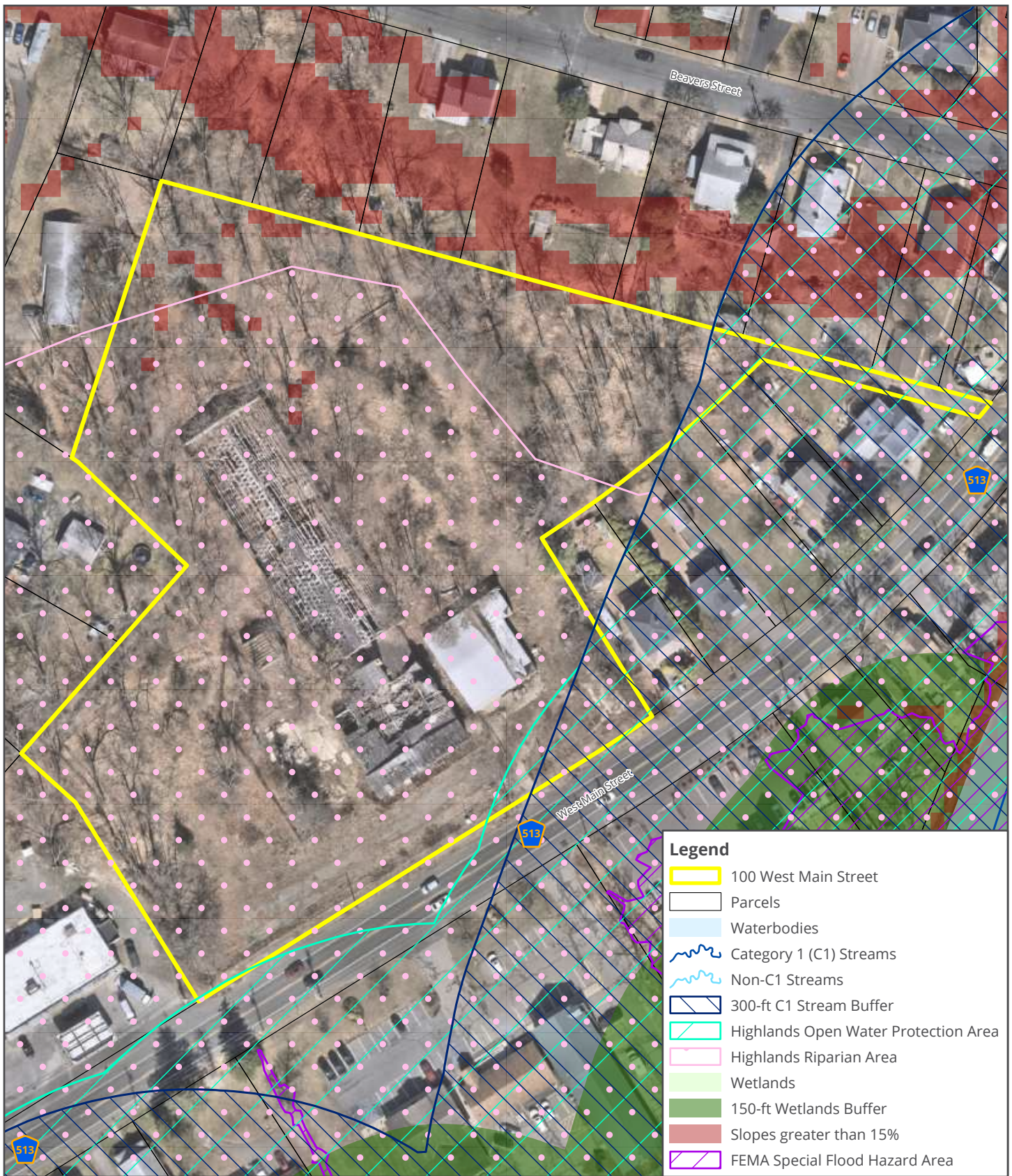
Since 2018, SE High Bridge, LLC has purchased the site and on January 23, 2025, the Borough designated SE High Bridge, LLC as the Redeveloper of the site via Resolution 080-2025. Subsequently, SE High Bridge, LLC entered into a redevelopment agreement with the Borough on February 20, 2025. An application for preliminary and final site plan was filed in March of 2025. The application includes a 98-unit multi-family building with 20 affordable units. The affordable units would be family rentals, providing 13% very-low-income units, 37% low-income units, and 50% moderate-income units. A hearing before the Planning Board is anticipated in the summer of 2025.

The image below of the concept plan is sourced from the latest application submission, which was received on/about April 8, 2025.



The affordable housing rules require municipalities to designate sites that are available, suitable, developable and approvable, as defined in NJAC 5:93-1. These terms are defined below:

- 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.
- Available site means a site with clear title, free of encumbrances which preclude development for low- and moderate-income housing.
- 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 NJDEP.
- 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 NJAC 5:93-4.



100 WEST MAIN STREET
BLOCK 24, LOT 16
BOROUGH OF HIGH BRIDGE
HUNTERDON COUNTY, NEW JERSEY

0 50 100
 1 inch = 100 feet



This map was developed using GIS digital data from FEMA, NJDEP, NJDOT, NJGIN, and the Highlands Council but this secondary product has not been verified and is not state-authorized. Aerial image sourced from NearMap, dated March 18, 2025.

May 2, 2025
 HIB0185

The property meets the four prongs of the rules as follows:

- **Approvable site** – High Bridge adopted the 100 West Main Street Redevelopment Plan in 2018, which was most recently amended in 2024. The Redevelopment Plan permits inclusionary residential development at a density of 23 units per acre with a 20% affordable housing set-aside. In 2025, the Borough designated SE High Bridge, LLC as the Redeveloper and entered into a Redevelopment Agreement. In March of 2025, a Board application was filed proposing the redevelopment of the site for 98 units with a 20% set-aside. This would yield 20 affordable units. The Borough anticipates a public hearing regarding the application to be held in the summer of 2025.
- **Available site** – The owner of the property has been designated as the Redeveloper by the Borough and has entered into a Redevelopers Agreement. The Borough is unaware of any title or encumbrance issue.
- **Developable site** – The property is in the sewer and water service areas. Additionally, the Borough has reserved sewer capacity specifically for this site.
- **Suitable site** – The property is adjacent to single-family residential uses as well as commercial and multi-family uses along West Main Street, which abuts the site. Most of the property is within the Highlands Riparian area, while nearly one quarter of an acre is within the Highlands OWPA. A 300-foot C1 stream buffer from the South Branch of the Raritan River also encompasses the northeastern corner of the property. Additionally, small areas of slopes greater than 15% acre are scattered in the northwest corner of the property. However, this site is currently developed with an old factory and contains buildings and impervious surfaces. The site has frontage along West Main Street.

Based on the information above and the fact that an application for a 98-unit multi-family development with 20 affordable units has been filed with the Board, 100 West Main Street will yield 20 affordable units which are creditable under NJAC 5:93-5.6 (inclusionary development). However, only **4 credits and 1 bonus** are applied to the TRO RDP pursuant to the FSHC Settlement Agreement.

Third Round Unmet Need Mechanisms & Credits

Three mechanisms were included in the 2018 Final Judgment of Compliance and Repose to address the Third Round Unmet Need. The following sections detail each site.

Downtown Business "DB" Zone

The DB Zone runs along Main Street in the heart of High Bridge. The Borough amended its DB Zone ordinance in December of 2014 to permit residential uses. (Prior to this, residential uses were not permitted, but existed in the zone.) Since the 2018 Final Judgment of Compliance and Repose, the Borough has amended the DB Zone ordinance to permit additional residential and mixed-use development in order to encourage development and/or redevelopment within the DB Zone. The DB Zone was last amended in 2023. Currently, the DB Zone permits the following residential development:

- Inclusionary multi-family development is a permitted conditional use. Required conditions include being within a quarter mile of the train station, having frontage on Center Street or

Mill Street (not Main Street), and containing at least 20,000 square feet. The maximum permitted density is 34 units per acre.

- Mixed-use commercial and residential development is a permitted conditional use. With this type of development residential uses must be located above the ground floor, except one unit may be located on the ground floor to meet ADA requirements. A maximum density of six units per acre is permitted on lots between 5,000 and 10,000 square feet, while a maximum density of eight units per acre is permitted on lots of greater than 10,000 square feet.

As the Borough is in the Highlands Region, each of the above conditional uses require a 20% affordable housing set-aside.

As discussed above, the affordable housing rules require municipalities to designate sites that are available, suitable, developable, and approvable, as defined in N.J.A.C. 5:93-1. The DB Zone meets the four prongs of the rules as follows:



Photo 6 – DB Zone

- Approvable site – High Bridge has amended the DB Zone since 2014 to permit residential development. As noted above, stand-alone inclusionary multi-family development and mixed-use inclusionary development are permitted conditional uses in the DB Zone. Maximum permitted densities vary from six units per acre to 34 units per acre depending on use and lot size. A 20% set-aside is required for municipalities within the Highlands Region. The existing DB Zone regulations provide an opportunity for inclusionary development.
- Available site – The properties within the DB Zone are not currently on the market for sale, but nothing prevents a private transaction between a willing buyer and seller. The Borough is not aware of any title issues or encumbrances on the properties.
- Developable site – The DB Zone is in the water and sewer service area.
- Suitable site – The DB Zone is High Bridge's community center with many restaurants, retail and service businesses. Residential properties surround most of this Zone, excluding to the west where a railroad right-of way separates the Zone from additional residential uses. As for environmental constraints, there is approximately 2.7 acres of steep slopes primarily around the Zone's perimeter. Additionally, approximately 1.5 acres of the Highlands OWPA and 0.14 acres of a 300-foot C1 stream buffer encompass the southern end of the Zone. See the map on page 54.

Based on the above information, the DB Zone presents a realistic opportunity to create affordable units that can be allocated towards the Borough's unmet need.

Mixed-Use Corridor "MUC" Zone

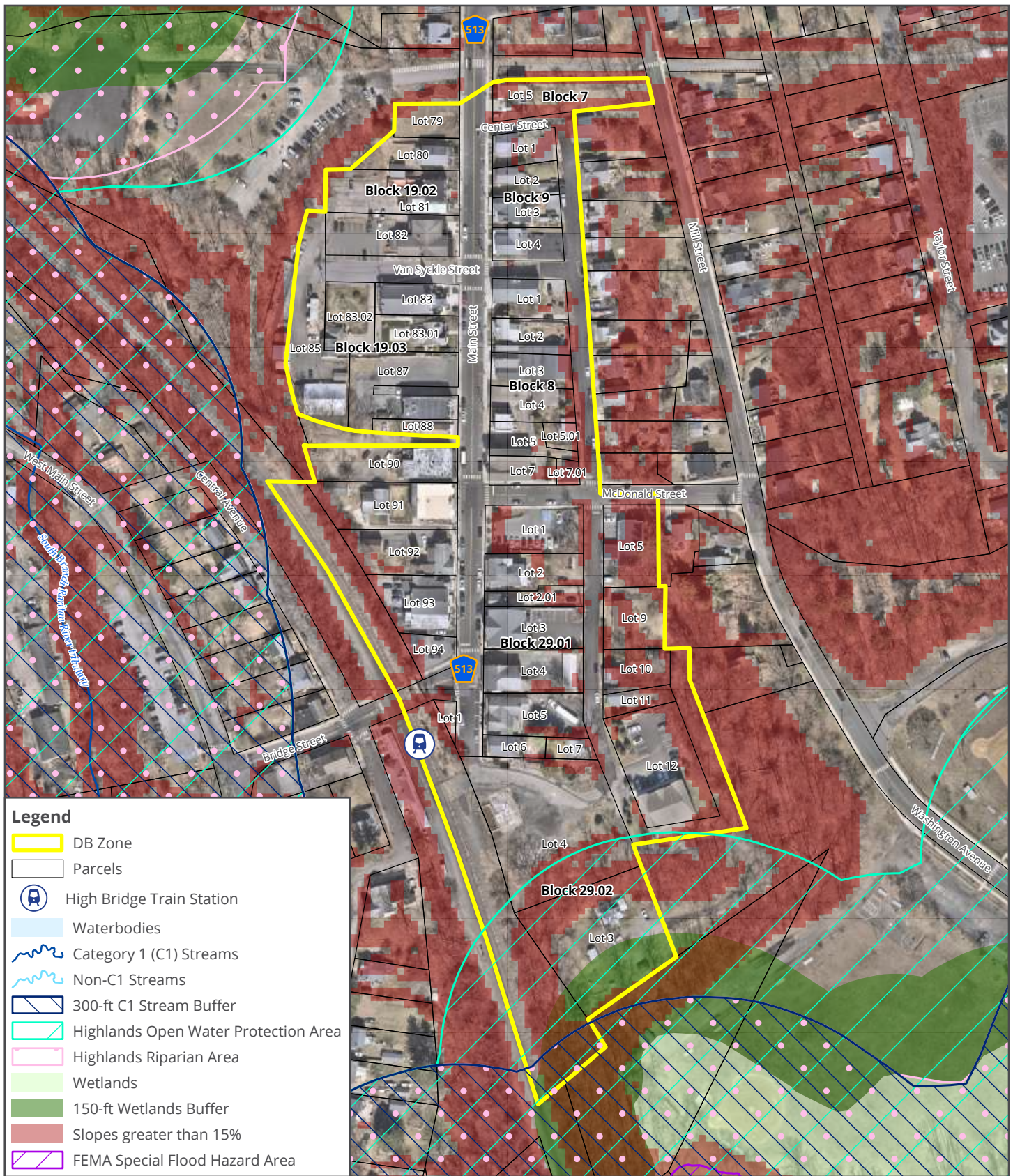
The MUC Zone encompasses 33 parcels along West Main Street, also known as County Route 513. The area has a hodgepodge of uses including single-family homes, a multi-family building, a restaurant, bank, gas station, and municipal services. The Borough created the MUC Zone in 2014 in an attempt to spur redevelopment. The Borough amended the MUC Zone in 2018 to permit residential units on lots greater than 25,000 square feet as a conditional use, subject to the following conditions:

- Minimum lot size – 25,000 square feet
- Maximum height – 3 stories/45 feet
- Maximum density – 15 units per acre
- A maximum of one handicap adaptable residential unit on the first floor
- A minimum of 20% of the units are reserved for affordable housing
- A variety of non-residential uses permitted on the ground floor to create a mixed-use development

The MUC Zone meets the four-prong test as follows:

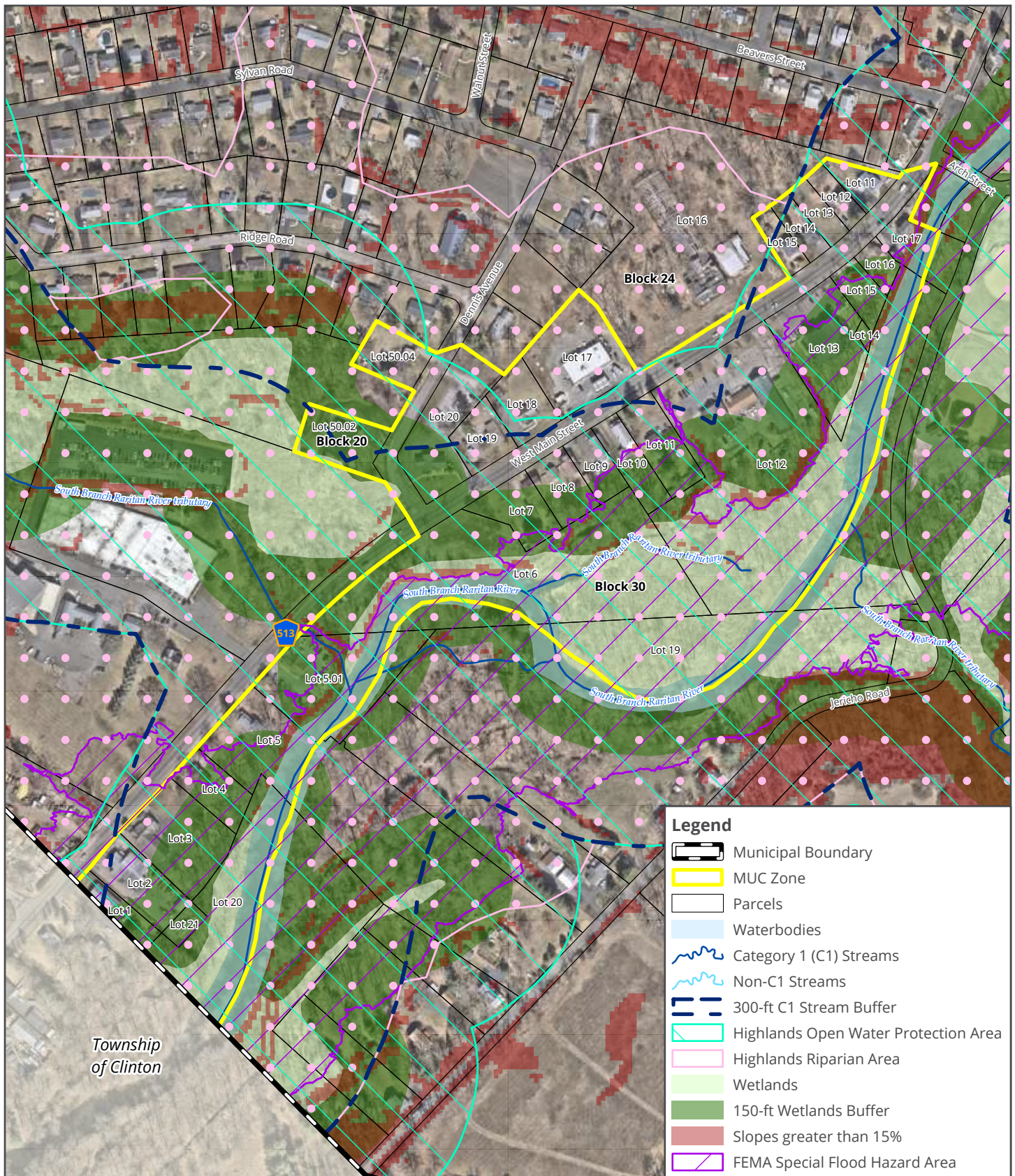
- Approvable site – The MUC Zone conditionally permits mixed-use inclusionary development on lots greater than 25,000 square feet at a maximum density of 15 units per acre. A 20% affordable housing set-aside is required, regardless of tenure. This will provide an opportunity for inclusionary development.
- Available site – The properties within the MUC Zone are not currently on the market for sale, but nothing prevents a private transaction between a willing buyer and seller. The Borough is not aware of any title issues or encumbrances on the properties.
- Developable site – The MUC Zone is in the water and sewer service area.

Suitable site – The MUC Zone is located at the Borough's southern boundary with Clinton Township along West Main Street (County Route 513). There are a variety of existing land uses within the Zone including residential, retail, service, food and public facilities. (See map on page 55.) The South Branch of the Raritan River runs primarily along the southeastern boundary of the Zone and therefore creates a potential for flooding on neighboring properties. The entire 25.85-acre Zone is within the Highlands Riparian Area, while over 94% is within the Highlands OHPA. The 300-foot C1 stream buffer from the South Branch or the Raritan River encompasses 22 acres of the Zone, while 13.5 acres is within a flood zone. Wetlands are located along the South Branch and at the corner of West Main Street and Dennis Avenue, which encompass 17.6 acres including the 150-foot wetlands buffer. Additionally, the wetlands are identified as wetlands for State Threatened species. Finally, slopes greater than 15% are scattered throughout the MUC Zone and encompass nearly one acre of the Zone. Despite these environmental features, many of the lots are currently developed and could be redeveloped.



DOWNTOWN BUSINESS "DB" ZONE
BLOCKS 8, 9, 19.02, 19.03, 29.01, & 29.02
BOROUGH OF HIGH BRIDGE
HUNTERDON COUNTY, NEW JERSEY

This map was developed using GIS digital data from FEMA, NJDEP, NJDOT, NJGIN, and the Highlands Council but this secondary product has not been verified and is not state-authorized. Aerial image sourced from NearMap, dated March 18, 2025.



MIXED-USE CORRIDOR "MUC" ZONE
BLOCKS 20, 24, AND 30
BOROUGH OF HIGH BRIDGE
HUNTERDON COUNTY, NEW JERSEY

0 150 300
 1 inch = 300 feet



This map was developed using GIS digital data from FEMA, NJDEP, NJDOT, NJGIN, and the Highlands Council but this secondary product has not been verified and is not state-authorized. Aerial image sourced from NearMap, dated March 18, 2025.

May 2, 2025
 HIB0185

Based on the above information, the MUC Zone presents a realistic opportunity to create affordable units that can be allocated towards the Borough's unmet need.

Fair Housing Act

Pursuant to the Amended FHA (NJSA 52:27D-329.9.a) new developments located, or to be located, within the jurisdiction of a regional planning entity requiring an adoption of a master plan or comprehensive management plan, are required to reserve 20% of said development's residential units for low- or moderate-income households. The Borough of High Bridge is located within the Highlands Region, in the Planning Area and has voluntarily conformed to the RMP. The Borough has and will continue to comply with this requirement of the FHA.⁹ On June 28, 2018 via Ordinance No. 2018-24, the Borough codified the FHA language within the Affordable Housing Ordinance in Section 145-504C.

Since the adoption of the 2018 Ordinance, the Highlands Council has issued an affordable housing guidance document and, as part of the HEFSP grant funding, requires conforming towns to adopt a Highlands Affordable Housing Ordinance. This Ordinance reflects the requirements of NJSA 52:27D-329.9a, which requires developments consisting of residential units within the jurisdiction of any regional planning entity to reserve for occupancy by affordable households at least 20% of the residential units constructed.

The Highlands Council has provided a template ordinance, and it contains the following language:

- Any development consisting of five or more newly constructed residential units shall reserve for occupancy at least 20 percent (20%) of the residential units constructed for low- or moderate-income households.
- Development exempt from the Highlands Act is not exempt from the 20% reservation requirement.
- A minimum of 13% of the affordable units shall be reserved for very low-income households pursuant to section 7 of P.L.2008, c.46 (C.52:27D-329.1).

The draft ordinance can be found in Appendix L, which will update the language adopted in 2018.

Based on the above information, the Highlands Affordable Housing Ordinance and its 20% set-aside requirement presents a realistic opportunity to create affordable units that can be allocated towards the Borough's "Unmet Need".

Fourth Round Highlands Build-out Mechanisms & Credits

The Borough has a one site that is under construction that will generate five affordable units towards the adjusted highlands build-out of 21 units. In addition, credits created as a result of the amended redevelopment plan for 100 West Main Street are also allocated to this obligation.

1 Main Street / Grastian Rose

Block 29.02, Lot 4, commonly known as 1 Main Street, is a 39,717 square foot parcel located at the southern terminus of Main Street. The site contains a building historically used as a freight rail station and later converted to a restaurant use. In 2021, the Casa May Restaurant closed and

⁹ It should be noted that High Bridge petitioned for Plan Conformance on December 24, 2009 and the Highlands Council approved the Borough's Petition for Plan Conformance on January 20, 2011.

another restaurant, Yard Tacos, briefly occupied the building. Since 2022, the building has been vacant. On April 22, 2024, the Borough adopted the Casa Maya Redevelopment Plan via Ordinance 2024-10, which overlays the site (see Appendix K for a copy of the Redevelopment Plan). The Redevelopment Plan permits multi-family dwellings on lots at least 35,000 square feet and a maximum density of 34 units per acre. A 20% affordable housing set-aside is required, regardless of tenure and affordable units are required to be deed restricted for a minimum of 40 years.

On May 9, 2024, the Borough Council designated Grastian Rose, LLC as the Redeveloper of the site via Resolution No. 153-2024. Subsequently, a Redevelopment Agreement between the Borough and Grastian Rose, LLC was executed on May 17, 2024. On September 16, 2024, the Planning Board/Board of Adjustment granted Preliminary and Final Site Plan approval to Grastian Rose, LLC to redevelop the site into a three-story inclusionary multi-family building containing 25 units, including five affordable units, which will be deed restricted for 40 years. The affordable units include one one-bedroom unit, three two-bedroom units, and one three-bedroom unit. The units will comply with the very-low, low-, and moderate-income split. The Board's approval was memorialized via Resolution No. PB-10-2024 on December 9, 2024 (see Appendix M for a copy of the Resolution). The restaurant building has been demolished to make way for the approved inclusionary multi-family building.

A copy of the approved site plan is included on the following page.



Photo 7 - 1 Main Street



1 Main Street meets the four prongs of the rules as follows:

- Approvable site – High Bridge adopted the Casa Maya Redevelopment Plan in 2024, which permits inclusionary residential development at a density of 34 units per acre with a 20% affordable housing set-aside. In 2024, the Borough designated Grastian Rose, LLC as the Redeveloper and entered into a Redevelopment Agreement. In September of 2024, the Planning Board/Board of Adjustment approved Grastian Rose, LLC's application to redevelop the site into a three-story, 25-unit inclusionary multi-family building with five affordable units.
- Available site – The owner of the property has been designated as the Redeveloper by the Borough and has entered into a Redevelopers Agreement. Grastian Rose, LLC received Board approval for a 25-unit inclusionary multi-family building. The restaurant building has been demolished, and the Borough anticipates issuing a CO in 2027. The Borough is unaware of any title or encumbrance issue.
- Developable site – The property is in the sewer and water service areas.
- Suitable site – The property is adjacent to single- and multi-family uses to the north, a three-story apartment building at 41 Center Street to the east, Union Forge Park to the southeast, a single-family dwelling to the south, and the High Bridge Train Station and railroad right-of-way to the west. The site does not contain a stream, waterbody, wetlands, nor is it within the Highlands Riparian Area or FEMA Special Flood Hazard Area. However, the southern portion of the property is within the Highlands OWPA and contains slopes greater than 15%.

The site did receive a Highlands Exemption. The property has access to Main Street and Center Street.

Based on the information above, 1 Main Street will yield five affordable units which are creditable under NJAC 5:93-5.6 (inclusionary development). Additionally, pursuant to NJSA 52:27D-311k.(3), the site is eligible for 0.5 bonus credits per unit due to being located within a half mile of a train station. (The train station is immediately adjacent to the site.) Therefore, 1 Main Street is eligible for **5 credits and 2.5 bonus credits**.

100 West Main Street

As described in the prior section, the Borough amended the Redevelopment Plan in 2024 to increase the overall yield on the site, which was necessary to attract a developer to undertake the expensive remediation necessary to allow the site to be redeveloped with housing. Furthermore, the Borough is requiring a 40-year deed restriction on the affordable units.

100 West Main Street is eligible for crediting pursuant to NJAC 5:93-5.6 (inclusionary development) and **11** of the site's 20 credits are allocated to this Obligation. This site is also eligible for **2.5 bonus credits** pursuant to NJSA 52:27D-311k.(3) for being located within a half mile of the Borough's train station.

Fourth Round "Unmet Need" Mechanisms & Credits

One strategy is proposed for the Fourth Round "Unmet Need".

100 West Main Street

As described above, the Borough amended the Redevelopment Plan in 2024 to increase the overall yield on the site, which was necessary to attract a developer to undertake the expensive remediation necessary to allow the site to be redeveloped with housing. Furthermore, the Borough is requiring a 40-year deed restriction on the affordable units.

100 West Main Street is eligible for crediting pursuant to NJAC 5:93-5.6 (inclusionary development) and **5** of the site's 20 credits are allocated to this Obligation.



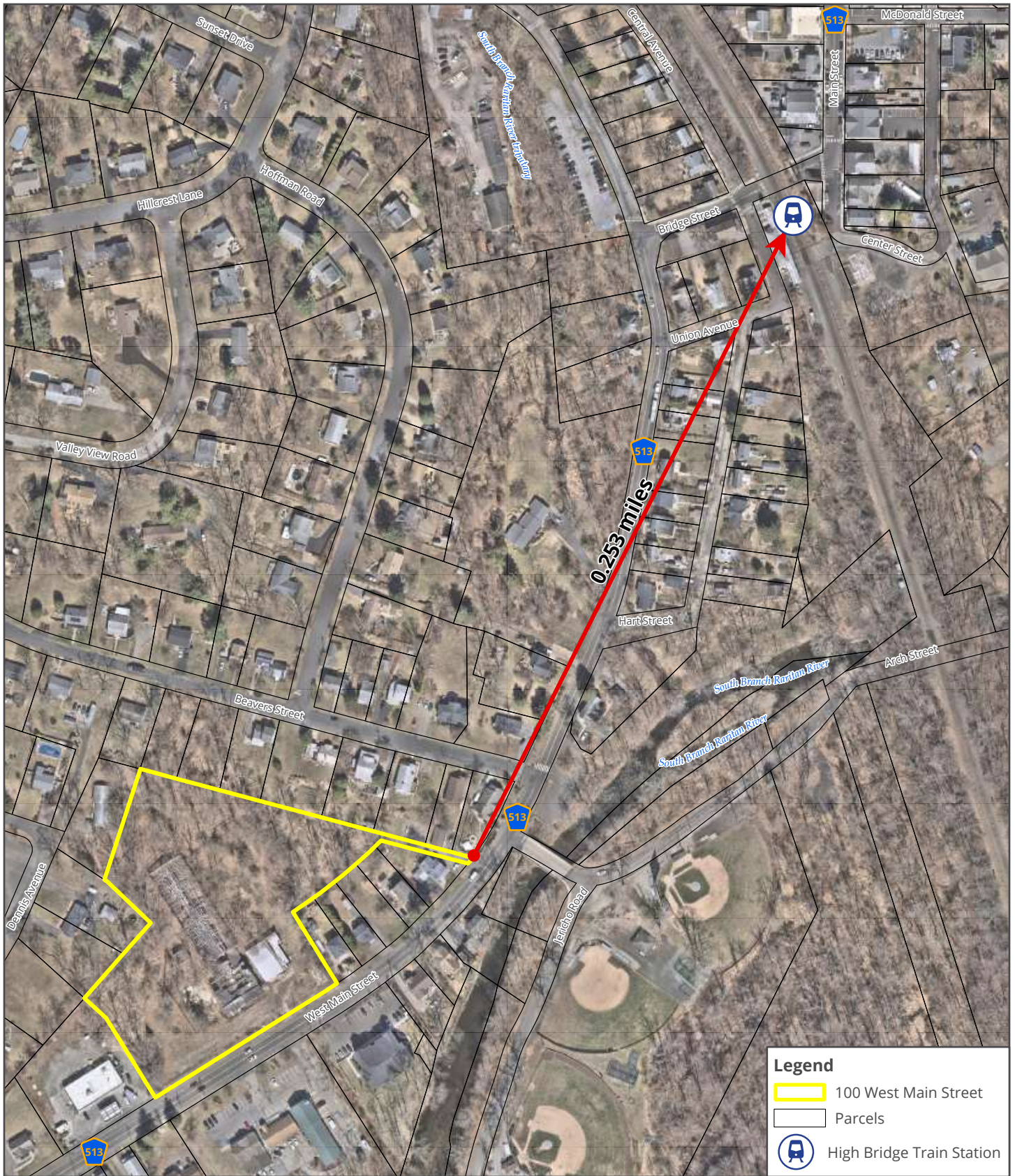
1 MAIN STREET / GRASTIAN ROSE
BLOCK 29.02, LOT 4
BOROUGH OF HIGH BRIDGE
HUNTERDON COUNTY, NEW JERSEY

0 40 80
 1 inch = 80 feet



This map was developed using GIS digital data from FEMA, NJDEP, NJDOT, NJGIN, and the Highlands Council but this secondary product has not been verified and is not state-authorized. Aerial image sourced from NearMap, dated March 18, 2025.

May 2, 2025
 HIB0185



100 WEST MAIN STREET - TRANSIT STATION PROXIMITY
BLOCK 24, LOT 16
BOROUGH OF HIGH BRIDGE
HUNTERDON COUNTY, NEW JERSEY

0 125 250
 1 inch = 250 feet



This map was developed using GIS digital data from FEMA, NJDEP, NJDOT, NJGIN, and the Highlands Council but this secondary product has not been verified and is not state-authorized. Aerial image sourced from NearMap, dated March 18, 2025.

May 2, 2025
 HIB0185

Summary of Proposed Mechanisms & Credits

The table below page summarizes the mechanisms and credits High Bridge proposes to address its four-part affordable housing obligation.

Proposed Mechanisms & Credits						
Mechanism	Credit Type	Tenure	Age-Restricted	Credit	Bonus	Total
<i>Rehabilitation</i>						
Borough-sponsored Rehabilitation Program	Rehabilitation			2		2
County Housing Rehabilitation Program	Rehabilitation			2		2
Total				4	0	4
<i>Third Round RDP Credits</i>						
100 West Main Street	Inclusionary	Rental	No	4	1	5
Total				4	1	5
<i>Third Round Unmet Need Credits</i>						
Downtown Business "DB" Zone	Inclusionary	TBD	TBD	TBD	TBD	TBD
Mixed-Use Corridor "MUC" Zone	Inclusionary	TBD	TBD	TBD	TBD	TBD
Highlands Affordable Housing Ordinance	Inclusionary	TBD	TBD	TBD	TBD	TBD
Total				TBD	TBD	TBD
<i>Fourth Round Highlands Build-Out Credits</i>						
1 Main Street / Grastian Rose	Inclusionary	Rental	No	5	2.5	7.5
100 West Main Street	Inclusionary	Rental	No	11	2.5	13.5
Total				16	5	21
<i>Fourth Round "Unmet Need" Credits</i>						
100 West Main Street	Inclusionary	Rental	No	5		5
Total				5	0	5

Summary of Mechanisms & Credits

The table on the following page provides a summary of the mechanisms, credits, and bonuses this HEFSP proposes. It should be noted that all proposed mechanisms will meet the required very-low, low-, and moderate-income distribution and will abide by the UHAC rules in place at the time of Board approval regarding bedroom distribution.

Existing & Proposed Credits

Mechanism	Credit Type	Credit	Bonus	Total
<i>Rehabilitation</i>				
Borough-sponsored Rehabilitation Program*	Rehabilitation	2		2
County Housing Rehabilitation Program*	Rehabilitation	2		2
Total		4	0	4
<i>Prior Round Credits</i>				
Credits without Controls	Family	18	0	18
Development Resources Corporation	Alternative Living Arrangement	5	2	7
38 Main Street	Inclusionary	1	1	2
Total		24	3	27
<i>Third Round RDP Credits</i>				
41 Center Street	Inclusionary	2	2	4
20 Main Street	Inclusionary	1	1	2
100 West Main Street*	Inclusionary	4	1	5
Total		7	4	11
<i>Third Round Unmet Need Credits</i>				
81 West Main Street	Inclusionary	1	0	1
81 West Main Street at 20 Main Street	Inclusionary	2	0	2
Downtown Business "DB" Zone*	Inclusionary	TBD	TBD	TBD
Mixed-Use Corridor "MUC" Zone*	Inclusionary	TBD	TBD	TBD
Highlands Affordable Housing Ordinance*	Inclusionary	TBD	TBD	TBD
Total		3	0	3
<i>Fourth Round Highlands Build-Out Credits</i>				
1 Main Street / Grastian Rose*	Inclusionary	5	2.5	7.5
100 West Main Street*	Inclusionary	11	2.5	13.5
Total		16	5	21
<i>Fourth Round "Unmet Need" Credits</i>				
100 West Main Street*	Inclusionary	5		5
Total		5	0	5

*Proposed Mechanisms

XIII. Implementation Schedule

The chart below provides an anticipated implementation schedule for the mechanisms that are proposed within the Borough of High Bridge.

Implementation Schedule											
Mechanism	'25	'26	'27	'28	'29	'30	'31	'32	'33	'34	'35
Borough-sponsored Rehabilitaiton Program											
Advertise Program											
Rehabilitate as applicable											
County Housing Rehabilitaiton Program											
Advertise Program											
Rehabilitate as applicable											
100 West Main Street											
Application Review & Approval											
Construction											
Occupancy											
1 Main Street / Grastian Rose											
Construction											
Occupancy											
Downtown Business "DB" Zone											
Application Review & Approval											
Construction											
Occupancy											
Mixed-Use Corridor "MUC" Zone											
Application Review & Approval											
Construction											
Occupancy											
Highlands Affordable Housing Ordinance											
Adopt Ordinance											
Application Review & Approval											
Construction											
Occupancy											

XIV. Implementing Documents

The deadlines prescribed in the Amended FHA failed to realize the multitude of moving parts in the world of affordable housing. On December 20, 2024 the Housing and Mortgage Finance Agency ("HMFA") adopted "amendments" to the Uniform Housing Affordability Controls ("UHAC"). These special adopted rules are hardly amendments as there are widespread and dramatic changes throughout the 192-page document. Furthermore, these rules are only effective until December 19, 2025, or such earlier date at which time the HMFA amends, adopts, or readopts the rules pursuant to the New Jersey Administrative Procedure Act.

Then, on March 17, 2025 the State issued proposed rules (NJAC 5:99), which are open for public comment until May 16, 2025. These rules concern the municipal ordinance requirements for development fees; monitoring requirements; regulations regarding municipal housing liaison and administrative agents, etc.

The two above documents impact several of the standard implementing documents that typically accompany a HEFSP. As municipal affordable housing trust funds are a precious and finite resource, the following documents will be drafted once permanent UHAC regulations and NJAC 5:99 rules are adopted:

1. Rehabilitation Operating Manual
2. Affordable Housing Ordinance
3. Development Fee Ordinance
4. Affirmative Marketing Plan
5. Operating Manuals
6. Affordability Assistance Mini-Manuals

There is no harm in postponing the drafting of these documents as municipalities have an obligation to create a realistic opportunity for their fair share of affordable housing which ends in 2035. Furthermore, the Amended FHA does not require the adoption of implementing ordinances and resolutions until March 15, 2026. Prior to that date, the 5:99 rules will be adopted and HMFA will have addressed the interim UHAC rules.

Attached to this HEFSP is the Affirmative Marketing Plan approved as part of the 2018 Amended Final Unconditional Judgment of Repose. This document can be found in Appendix N. Also attached is the current Housing Rehabilitation Manual and Operating Manual.

A copy of the Borough's current Development Fee Ordinance can be found in Chapter 145 Land Use and Development, Article VII Fees, Guarantees, Inspections and Off-Tract Improvements (<https://ecode360.com/41436383#41436506>). High Bridge's current Affordable Housing Ordinance can be found in Chapter 145 Land Use and Development, Article V Affordable Housing (<https://ecode360.com/41435733#41435733>).

XV. Highlands Regional Master Plan Compliance

The Amended FHA lists the essential components of a municipality's housing element. NJSA 52-27D-310h. states the following:

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.

The remainder of this chapter is divided into four sections – a summary of the build-out findings, site-specific consistency issues, redevelopment opportunities, and 100% affordable housing opportunities.

Highlands Build-Out

As detailed in Chapter XI., on November 1, 2024, the Highlands Council issued a Highlands Municipal Build-Out Update, which outlined the process the Council utilized to determine parcels eligible for development. Conforming municipalities were provided access to an online GIS portal to evaluate identified properties as well as any properties that did not have a tax code classification. High Bridge was required to evaluate five properties. High Bridge's review found each of the five properties were not developable. However, the GIS platform did not include a recently vacated lot, Block 29.02, Lot 4, due to a demolition. This property was added into the analysis. After the Borough's initial review, the Highlands Council provided a spreadsheet with the results. Said spreadsheet could be sorted by lots that are considered developable by the Highlands Council. The results revealed only one vacant and developable property, which totals 0.67 acres. This lot would generate a total of 25 units, including five affordable units with a 20% set-aside. Therefore, the Borough of High Bridge's Highlands affordable housing build-out is five.

However, the build-out does not consider redevelopment opportunities. As noted in Chapter VI., 100 West Main Street has a pending Board application for a 98-unit development. Multiplying 98 by 20% results in 20 additional affordable units. However, four of 100 West Main's units are already allocated to the TRO. Therefore, we proposing adding the remaining 16 units (to avoid double counting) to the build-out analysis. Therefore, the amended Fourth Round build-out would be 21.

It should be noted that the Highlands build-out restricts all affordable housing obligations, not just the Fourth Round. Build-out is a limit on development in the entire community and does not consider past outstanding affordable housing obligations. Therefore, unbuilt Third Round Unmet Need and Fourth Round Obligation are adjusted to or capped at a Highlands affordable housing obligation of 21.

Site-Specific Consistency Issues

As noted in the chapters above, there are four site/area-specific proposed mechanisms to create new affordable housing units. The following sections provide a narrative of site-specific consistency issues for each.

1 Main Street / Grastian Rose

According to the Advanced Property Report from the Highlands website, the property contains the following features:

- 0.29 acres of forest resource area
- 0.69 acres of moderate forest integrity (the entire site)
- 0.69 acres of Existing Community Zone
- 0.21 acres of open water protection area
- 0.69 acres of moderate watershed value
- 0.69 acres of low riparian integrity
- 0.15 acres of severely constrained slopes

As noted above, the site has been developed since 1916 as a former freight rail station and more recently utilized as a restaurant. The objective of the Borough is to redevelop the site for the purpose of creating inclusive multi-family housing. Demolition of the building has occurred to make way for an approved 25-unit inclusionary multi-family building, which will contain five affordable units. The redevelopment of the site will add value to the southern terminus of High Bridge's main street and downtown area.

While, the Highlands mapping indicates that the entire site qualifies as moderate forest integrity, the site was previously occupied as a freight rail station and later a restaurant. The northern third of the site contained the building and paved parking area, while the southern third is wooded. As the site is in an Existing Community Zone, the Borough's downtown, and previously developed, it is appropriate to redevelop the site. However, the Redevelopment Plan does include a provision to comply with the Borough's tree removal and replacement requirements (Chapter 380 Trees).

A portion along the rear of the parcel is within the open water protection area and contains severely constrained slopes. This area has historically been a wooded slope, while the area closer to Main Street and Center Street was developed with a building and parking area. As noted above, the site is in an Existing Community Zone and is currently developed, therefore it is appropriate to redevelop the site.

The entire site is considered to have a low watershed value and low riparian integrity. The site operated as freight rail station since the early 1900s until it was converted into a restaurant. The site is appropriate to redevelop due to its existing developed nature and the fact that it is located in the Existing Community Zone in the Borough's downtown.

It should be noted that the site qualified for Highlands Exemption #4, reconstruction of buildings or structures within 125% of the existing impervious surfaces.

One of the Highlands RMP region-wide goals is the promotion of redevelopment of existing developed areas. Redevelopment of 1 West Main Street also advances the following goal, policies and objectives:

- **Goal 5E:** Minimization of travel demand and vehicle miles of travel.
 - **Policy 5E1:** To promote land use patterns that support a balance of jobs to housing as a means of reducing average trip lengths.
 - **Objective 5E1a:** Development and redevelopment which provides housing and jobs in close proximity.
 - **Objective 5E1b:** Development and redevelopment in close proximity to rail stations and along bus routes.
- **Policy 5E3:** To promote land use patterns which facilitate use of alternative modes of transportation including walking and the use of bicycles.
- **Goal 6F:** Support of compact development, mixed-use development and redevelopment and maximization of water, wastewater, and transit infrastructure investments for future land use of land and development within the ECZ.
 - **Policy 6F1:** To promote compatible development and redevelopment within the ECZ.
 - **Policy 6F3:** To ensure that development activities within the ECZ are subject to standards and criteria which ensure that development and redevelopment incorporate smart growth principles and do not adversely affect natural resources.
 - **Policy 6F4:** To ensure that development and redevelopment within the ECZ are served by adequate public facilities including water supply, wastewater treatment, transportation, educational and community facilities.
 - **Policy 6F5:** To ensure that development and redevelopment in the ECZ are compatible with existing community character.
 - **Policy 6F6:** To encourage new population growth, where desired by the municipality, and development in the ECZ is in the form of center based and mixed-use development.
 - **Policy 6F7:** To encourage redevelopment in the ECZ as a means to relieve development pressure from more environmentally sensitive areas.
- **Goal 6H:** Guide development away from environmentally sensitive and agricultural lands and promote development and redevelopment in or adjacent to existing developed lands.
 - **Policy 6H4:** To promote compatible growth opportunities that include in-fill development, adaptive reuse, redevelopment, and brownfields redevelopment in existing developed areas.
 - **Policy 6H5:** To promote land uses which create a sense of place with attractive, walkable neighborhoods that support community connectivity of developed lands and community facilities.
 - **Policy 6H9:** To incorporate smart growth principles and green building design and technology in development and redevelopment initiatives.

- **Goal 6J:** Accommodation of regional growth and development needs through the reuse and redevelopment of previously developed areas, including brownfields, grayfields, and underutilized sites.
 - **Policy 6J2:** To encourage redevelopment in the ECZ in the Planning Area of brownfields, grayfields, and other previously developed areas that have adequate water, wastewater, transportation capacity, and are appropriate for increased land use intensity or conversion to greenfields, as approved through Plan Conformance or the Highlands Redevelopment Area Designation process.
- **Goal 6K:** Concentrate residential, commercial, and industrial development, redevelopment, and economic growth in existing developed areas in locations with limited environmental constraints, access to existing utilities, and transportation infrastructure.
 - **Policy 6K1:** To promote redevelopment of brownfields, grayfields, and other previously developed areas in a manner consistent with the goals and requirements of the Plan.
- **Goal 6N:** Use of smart growth principles, including low impact development, to guide development and redevelopment in the Highlands Region.
- **Goal 6O:** Market-rate and affordable housing sufficient to meet the needs of the Highlands Region within the context of economic, social, and environmental considerations and constraints.
 - **Policy 6O2:** To promote, where appropriate and permitted by the Land Use Capability Zone, center-based development approaches that address a mix of housing types, support mixed uses, and implement compact development approaches.
 - **Policy 6O3:** To promote, where appropriate and permitted by the Land Use Capability Zone, affordable housing within new residential and mixed-use development, redevelopment, or adaptive reuse projects.
 - **Policy 6O4:** To encourage the targeting of new housing to areas with compatible existing densities and within walking distance of schools, employment, transit, and community facilities and services.

The list of goals, policies, and objectives that can be advanced by the redevelopment of 1 Main Street for inclusionary housing illustrates the site's consistency with the Highlands RMP.

100 West Main Street

According to the Advanced Property Report from the Highlands website, the property contains the following features:

- 0.62 acres of important farmland soils
- 1.08 acres of total forest area
- 4.39 acres of moderate forest integrity (the entire site)
- 4.39 acres of Existing Community Zone ("ECZ")
- 0.24 acres of open water protection area
- 4.39 acres of moderate watershed value
- 3.60 acres of riparian area

- 4.39 acres of low riparian integrity
- 0.01 acres of severely constrained slopes
- 0.01 acres of moderately constrained slopes

As noted above, the site has been developed for decades as a former industrial facility. In fact, the site had both soil and water contamination, however, the soil contamination has been remediated. The objective of the Borough is to redevelop the site by demolishing the dilapidated buildings and replacing them with structures that add value to the streetscape and the neighborhood.

While the Highlands mapping has noted important farmland soils, the site was previously occupied by an industrial complex for 50+ years. Prior to that historic aerials illustrate the site as wooded. While the mapping may indicate “important” farmland soils, due to the small area and the fact that the site was previously contaminated, 0.62 acres of important farmland soils within the larger parcel are unlikely to be utilized for farmland.

The Highlands mapping indicates that the entire site qualifies as moderate forest integrity. It should be noted that a portion of the property is wooded (mostly along the perimeter), while the rear of the site has been consumed by overgrown vegetation due to a lack of property maintenance. As the site is in an ECZ and currently developed, it is appropriate to redevelop the site. However, the Redevelopment Plan does include a provision to retain the trees along the perimeter that border adjacent single-family homes.

A portion along the front of the parcel is within the open water protection area. The front portion of the site has historically been a part of the operations of the industrial facility – parking, driveways, etc. As noted above, the site is in an ECZ and is currently developed, therefore it is appropriate to redevelop the site.

The entire site is considered to have a moderate watershed value and contain 3.66 acres of riparian area. The site operated as an industrial facility for 50+ years and is appropriate to redevelop due to its existing developed nature and the fact that it is located in the ECZ along a County roadway.

One of the Highlands RMP region-wide goals is the promotion of brownfield remediation. Additionally, redevelopment inclusionary multi-family housing will advance Goal 5E, Policy 5E1, Objective 5E1a, Objective 5E1b and Policy 5E3 as described on page 66. It would also advance Goal 6F, Policies 6F1 and 6F3 through 7, Goal 6H, Policies 6H4, 6H5, and 6H9, Goal 6J and Policy 6J2, Goal 6K and Policy 6K1, Goal 6N, and Goal 6O, Policies 6O2 through 6O4 as detailed above.

The list of goals, policies, and objectives that can be advanced by the redevelopment of 100 West Main Street for inclusionary housing illustrates the site’s consistency with the Highlands RMP.

Downtown Business “DB” Zone

Except for a small portion of the railroad right-of-way, the Downtown Business Zone is located within the Existing Community Zone. This area is developed and is the “downtown” of High Bridge, where the train station is located. Except for additions and renovations of existing structures, any new development will be in the form of redevelopment. While there may be mapped environmental features within the DB Zone, redevelopment of this area is encouraged by the Highlands RMP.

Redevelopment for mixed-use development that includes inclusionary multi-family housing will advance Goal 5E, Policy 5E1, Objectives 5E1a and 5E1b, and Policy 5E3, Goal 6F, Policies 6F1 and 6F3

through 7, Goal 6H, Policies 6H4, 6H5, and 6H9, Goal 6J and Policy 6J2, Goal 6K and Policy 6K1, Goal 6N, and Goal 6O, Policies 6O2 through 6O4 as detailed above.

The list of goals, policies, and objectives that can be advanced by the redevelopment of the DB Zone for inclusionary housing illustrates the area's consistency with the Highlands RMP.

Mixed-Use Corridor "MUC" Zone

The majority of the MUC Zone is located within the Existing Community Zone. Similar to the DB Zone, any new development will be limited to additions and renovations or will require buildings to be torn down and redeveloped. While there are mapped environmental features within the MUC Zone, redevelopment of this area is encouraged by the Highlands RMP.

Redevelopment for mixed-use development that includes inclusionary multi-family housing will advance Goal 5E, Policy 5E1, Objectives 5E1a and 5E1b, and Policy 5E3, Goal 6F, Policies 6F1 and 6F3 through 7, Goal 6H, Policies 6H4, 6H5, and 6H9, Goal 6J and Policy 6J2, Goal 6K and Policy 6K1, Goal 6N, and Goal 6O, Policies 6O2 through 6O4 as detailed above.

The list of goals, policies, and objectives that can be advanced by the redevelopment of the MUC Zone for inclusionary housing illustrates the area's consistency with the Highlands RMP.

Redevelopment Opportunities

On May 11, 1995, the Borough Council designated the entire Borough as an Area in Need of Rehabilitation via Resolution No. 95-27, which permits the Borough to develop and adopt redevelopment plans for portions of the Rehabilitation Area. Additionally, on June 23, 2016, the Borough Council designated 100 West Main Street (Block 24, Lot 16) as an Area in Need of Redevelopment. Since the Borough's designations, three redevelopment Plans have been adopted, 100 West Main Street Redevelopment Plan adopted on March 22, 2018 and last amended on September 12, 2024, Golf Course Redevelopment Plan adopted on June 9, 2021, and Casa Maya Redevelopment Plan adopted on April 11, 2024. However, only the redevelopment plans for 100 West Main Street and Casa Maya (1 Main Street) provide an opportunity for affordable housing.

The 100 West Main Street Redevelopment Plan permits inclusionary multi-family residential development at a density of 23 units per acre with a 20% affordable housing set-aside. A variety of non-residential uses are also permitted to encourage mixed-use development. In March of 2025, an application was submitted to the Planning Board/Board of Adjustment by the Designated Redeveloper, SE High Bridge, LLC, to redevelop the site into a 98-unit inclusionary multi-family residential development with 20 affordable units. A public hearing on the application is anticipated in the summer of 2025.

Additionally, the Casa Maya Redevelopment Plan permits inclusionary multi-family residential development at a density of 34 units per acre with a 20% affordable housing set-aside. The Planning Board/Board of Adjustment approved the Designated Redeveloper's (Grastian Rose, LLC) application to redevelop the property into a 25-unit inclusionary multi-family residential development with five affordable units. The former restaurant building has been demolished to make way for the approved development. The Borough anticipates issuing a CO in 2027.

Furthermore, the Borough has created additional opportunities for inclusionary residential development in the Downtown Business (DB) Zone and the Mixed-Use Corridor (MUC) Zone. The Borough has amended the DB Zone to include stand-alone residential development and mixed-use

structures with multi-family residential uses above the ground floor as permitted conditional uses. Both uses require a 20% affordable housing set-aside. The Borough has also amended the MUC Zone to include multi-family residential use above the ground floor as permitted conditional use. A 20% affordable housing set-aside is required for this type of development.

As demonstrated above, the Borough has implemented two Redevelopment Plans and amended two of its zones to create redevelopment opportunities that would include inclusionary residential development.

100% Affordable Opportunities

The Borough has a finite affordable housing trust fund and does not propose any 100% affordable housing developments within this HEFSP. Furthermore, the Amended FHA cannot require a municipality to spend its own money on compliance and consequently cannot compel 100% projects.

XVI. Appendix

- A. 2017 Settlement Agreement with Fair Share Housing Center
- B. 2018 Final Judgment of Compliance and Repose
- C. Resolution 077-2025 Committing to Fourth Round Obligation
- D. 2025 "Complaint for a Declaratory Judgment of Compliance with the Fair Housing Act"
- E. April 8, 2025 Order setting Fourth Round Obligation
- F. Highlands Council Resolution 2011-2
- G. Highlands Fourth Round Build-out Analysis and Highlands Council Email
- H. Delta Community Supports License
- I. 81 Main Street Board Resolution and 81 West Main Street and 20 Main Street Deed Restrictions
- J. 2024 Exact Tool Redevelopment Plan
- K. Casa Maya Redevelopment Plan
- L. Draft Highlands Affordable Housing Ordinance
- M. 1 Main Street Board Resolution
- N. Affirmative Marketing Plan
- O. Housing Rehabilitation Manual
- P. Operating Manual
- Q. Draft 2025 Spending Plan
- R. Municipal Housing Liaison Resolution
- S. Administrative Agent Resolution
- T. Administrative Agent Rehabilitation Program Resolution
- U. Resolution 129-2025 Approving Mediated Fourth Round Obligation
- V. Draft Borough Ordinance
- W. Intent to Bond Resolution
- X. Highlands Council May 29, 2025 Letter
- Y. Planning Board Resolution Adopting HEFSP