



2025

Fourth Round Housing Element and Fair Share Plan

Readington Township, Hunterdon County, New Jersey

June 16, 2025

Adopted: June 26, 2025

Endorsed: _____

Prepared by:

Clarke Caton Hintz | 100 BARRACK STREET | TRENTON, NJ | 08608

Housing Element and Fair Share Plan

Readington Township, Hunterdon County, New Jersey

Adopted by the Planning Board on June 26, 2025

Endorsed by the Township Committee on _____.

Prepared for Readington Township Planning Board by:

Clarke Caton Hintz



Michael F. Sullivan, ASLA AICP
Principal
PP License # 5153



Elaine R. Clisham, PP AICP
Planner
PP License # 6507

A signed and sealed version is available at the municipal building.



PLANNING BOARD

Craig Villa, Class IV, Chairman

Anna Barton, Class IV, Vice Chair

Adam Mueller, Class I

Robert Becker, Class II

Vincent Panico, Class III

Trevor Izzo, Class IV

Christopher John, Class IV

Neil Hendrickson, Class IV

Eric Rhoades, Class IV

Jacqueline Hindle, Alternate No. 1

David Somonski, Alternate No. 2

Johnathan Drill, Esq., Planning Board Attorney

Michael Sullivan, ASLA, AICP, Township Planner

Rob O'Brien, PE, Planning Board Engineer

Jay Troutman, PE, Planning Board Traffic Engineer

Sherri Russo, Planning Board Secretary

MAYOR & TOWNSHIP COMMITTEE

Adam Mueller, Mayor

Vincent Panico, Deputy Mayor

John Albanese

Jonathan Heller

Juergen Huelsebusch

Ann Marie Lehberger, RMC, Acting Municipal Clerk

Christopher Corsini, Esq., Township Attorney

Michael Edwards, Esq., Affordable Housing Attorney

Robert O'Brien, PE, Township Engineer

Christine Dey, Township Housing Coordinator

TABLE OF CONTENTS

Executive Summary	1
Affordable Housing Judicial and Legislative Background.....	3
Readington's Affordable Housing History	7
Affordability Requirements	9
Housing Plan Element and Fair Share Plan Requirements	11
Housing, demographic, and Employment analysis	13
Fair Share Plan	24
Readington's Affordable Housing Obligation.....	24
Readington's Affordable Housing Plan	25
Income distribution.....	67
Affordable Housing Administration	71
Summary.....	75

APPENDICES TO THE HOUSING ELEMENT AND FAIR SHARE PLAN

1. Third Round Settlement Agreement, Fairness Order, Judgment of Repose
2. Fourth Round Resolution, Declaratory Judgment Filing, Order Fixing Obligation, Resolution of Adoption
3. Rehabilitation Manual
4. Community Options Funding Agreement
5. Affordable Housing Ordinance, Development Fee Ordinance
6. Affirmative Marketing Plan
7. Spending Plan



EXECUTIVE SUMMARY

The Township is one of very few municipalities to have received substantive certification in Round 1, in Round 2 and in Round 3 prior to the Court's decision in Mount Laurel IV. In addition, the Township reacted to Mount Laurel I, before COAH even existed, by producing affordable housing. After Mount Laurel IV in 2015, despite the nearly tripling of its obligations measured against COAH's Round 3 calculations, Readington complied in extraordinary fashion by securing 25% set-asides from inclusionary developers and by leveraging all kinds of municipally sponsored programs at great expense to the Township. True to its history, the Township now seeks to voluntarily comply with its Round 4 obligations but must do so while also noting that it has been denied multiple requests for an extension of the June 30, 2025, deadline and while also noting it is currently appealing its Round 4 obligation.

This Fourth Round Housing Plan Element and Fair Share Plan ("HPE/FSP") has been prepared for the Township of Readington ("Readington"), Hunterdon County, in accordance with the New Jersey Fair Housing Act ("FHA") at N.J.S.A. 52:27D-310 as amended by P.L. 2024 c.2, the Administrative Directive #14-24, and the rules of the New Jersey Council on Affordable Housing ("COAH") contained at N.J.A.C. 5:93 *et seq.* This plan is an update to the Township's Third Round HPE/FSP adopted by the Planning Board on May 26, 2020, and endorsed by the Township Committee on June 15, 2020. This cumulative Fourth Round HPE/FSP will serve as the foundation for the Township's submission to the Superior Court of New Jersey and the Affordable Housing Dispute Resolution Program ("Program"). The Township has filed an appeal of the calculation of its Round 4 affordable housing obligation, which was subject to cross-appeals regarding same. The Township submits this plan entirely without prejudice as it relates to that appeal. If the Township is successful in reducing its obligation based on what it believes to be glaring errors in the allocation, it reserves the right to amend the plan accordingly and/or to utilize any access credits towards future rounds. The Township also reserves all rights pursuant to prevailing law regarding tolling deadlines for implementation of the plan and adoption of ordinances while the appeal remains pending.

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

Prior Round/Third Round

On October 15, 2019, the Superior Court approved the Township's 2019 settlement agreement with the Fair Share Housing Center ("FSHC"), which set the Township's Prior Round Prospective Need as previously established by COAH and established the Township's Third Round "Gap"/Prospective Need as follows:

- Prior Round Prospective Need: 394
- Third Round Prospective Need: 1,045

The 2019 settlement agreement reflected a durational adjustment due to a lack of sewer capacity, which reduced the Township's Third Round obligation of 1,045 to a Third Round "non-deferred" obligation



of 783 and a deferred obligation of 262. The Township's Third Round HPE/FSP was approved by the Superior Court in a Final Judgment of Compliance and Repose issued on March 28, 2022.

The Township addressed its Prior Round obligation through a Regional Contribution Agreement, family for-sale units at Whitehouse Village and through approved credits without controls, family rental units at Calio House, Cushetunk Manor, the Hartman property, and the Nelson Street project, ECHO age-restricted rental units, various special-needs facilities, and permissible rental bonuses.

The Township continues to address its non-deferred Third Round obligation through surplus credits from the Prior Round, extensions of controls on affordable ownership units, various special-needs facilities, a market-to-affordable program, several municipally sponsored 100% affordable projects, proposed inclusionary family and age-restricted projects, and permissible bonuses. The Township included in its Third Round HPE/FSP sufficient mechanisms to address the deferred portion of its obligation once sewer capacity for those mechanisms became available. Those mechanisms include an expansion of an existing age-restricted project, and proposed development in three inclusionary zones.

The current status of all mechanisms not completed at the time of the Township's JOR is updated below.

Fourth Round

As required by P.L.024 c.2, in October 2024 the state Department of Community Affairs ("DCA") published advisory Fourth Round affordable housing obligations for each municipality in the state, using the methodology set forth in the law. The DCA calculations set Readington's Fourth Round prospective need obligation at 561. On January 29, 2025, as required by the law, Readington adopted and submitted a binding resolution stipulating to a Fourth Round present need, or Rehabilitation obligation, of 50 units, and a Fourth Round prospective need obligation of 315. As required by the law, the resolution included documentation that the Township followed the methodology in the law in arriving at its calculation of its Fourth Round prospective need obligation. On January 30, 2025, the Township submitted its Declaratory Judgment complaint, stipulating to a Fourth Round prospective need obligation of 315.

Readington was one of approximately 170 municipalities that received challenges to their Fourth Round obligation stipulations. Pursuant to the December 2024 Administrative Directive from the Court, Readington engaged in mediation with the assistance of a Court-appointed special adjudicator, who recommended to the Court that the Township's Fourth Round present need obligation be fixed at 50, and its Fourth Round prospective need obligation be fixed at 504. The Court accepted the recommendation, and on May 15, 2025, entered an order fixing the Township's Fourth obligations as:

- Fourth Round Rehabilitation Share 50
- Fourth Round Prospective Need: 504

The Township's Fourth Round prospective need will be addressed via extensions of controls on 95 family and age-restricted units; two proposed inclusionary family rental developments; and permissible bonuses for redevelopment and for extending controls on rental units.



AFFORDABLE HOUSING JUDICIAL AND LEGISLATIVE BACKGROUND

In the 1975 Mount Laurel¹ decision, the New Jersey Supreme Court ruled that developing municipalities have a constitutional obligation to provide diversity and choice in the housing types permitted in the municipality, including housing for low- and moderate-income households. In its 1983 Mount Laurel II decision,² the New Jersey Supreme Court extended to all municipalities with any “growth area” as designated in the State Development Guide Plan (now superseded by the State Development and Redevelopment Plan, or SDRP) the obligation to provide their “fair share” of a calculated regional need for affordable units. Mount Laurel II also introduced a “builder’s remedy” if a municipality was not providing its fair share of affordable housing. A builder’s remedy may permit a developer that is successful in litigation the right to develop what is typically a higher density multi-family project on land not zoned to permit such use, so long as a “substantial” percentage of the proposed units would be reserved for low- and moderate-income households.

In 1985, in response to Mount Laurel II, the New Jersey Legislature enacted the Fair Housing Act (“FHA”).³ The FHA created the Council on Affordable Housing (“COAH”) as an administrative body responsible for oversight of municipalities’ affordable housing efforts, rather than having oversight go through the courts. The Legislature charged COAH with promulgating regulations (i) to establish housing regions; (ii) to estimate low- and moderate-income housing needs; (iii) to set criteria and guidelines for municipalities to use in determining and addressing their fair share obligations, and (iv) to create a process for the review and approval of municipal housing elements and fair share plans.

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

COAH created the criteria and regulations for municipalities to address their affordable housing obligations. COAH originally established a methodology for determining municipal affordable housing obligations for the six-year period between 1987 and 1993,⁴ which period became known as the First Round. This methodology established an existing need to address substandard housing that was being occupied by low- and moderate-income households (variously known as “present need” or “rehabilitation share”), and calculated future demand, to be satisfied typically, but not exclusively, with new construction (“prospective need” or “fair share”).

The First Round methodology was superseded in 1994 by COAH’s Second Round regulations.⁵ The 1994 regulations recalculated a portion of the 1987-1993 affordable housing obligations for each municipality and computed the additional municipal affordable housing need from 1993 to 1999 using 1990 census data. These regulations identified a municipality’s cumulative obligations for the First and Second Rounds. Under regulations adopted for the Third Round, a municipality’s obligation to provide affordable housing for the First and Second Rounds is referred to cumulatively as the Prior Round obligation.

¹ Southern Burlington County NAACP v. Township of Mount Laurel, 67 N.J. 151 (1975)

² Southern Burlington County NAACP v. Township of Mount Laurel, 92 N.J. 158 (1983)

³ N.J.S.A. 52:27D-301 *et seq.*

⁴ N.J.A.C. 5:92-1 *et seq.*

⁵ N.J.A.C. 5:93-1.1 *et seq.*



COAH's Third Round and Related Judicial and Legislative Activity (1999-2025)

The FHA had originally required housing rounds to be for a six-year period for the First and Second Rounds. In 2001, the time period increased to a 10-year period consistent with the Municipal Land Use Law ("MLUL"). In order to utilize 2000 census data, which hadn't yet been released, COAH delayed the start of the Third Round from 1999 to 2004, with the Third Round time period initially ending in 2014. In December 2004, COAH's first version of the Third Round rules⁶ became effective, and the 15-year Third Round *time period* (1999 – 2014) was condensed into an affordable housing *delivery period* from January 1, 2004, through January 1, 2014.

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

On January 25, 2007, a New Jersey Appellate Court decision⁷ invalidated key elements of the first version of the Third Round rules, including the growth share approach, and the Court ordered COAH to propose and adopt amendments to its rules. COAH issued revised rules effective on June 2, 2008 (as well as a further rule revision effective on October 20, 2008), which largely retained the growth share approach.

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

Third Round Judicial Activity

After various challenges were filed, on September 26, 2013, the New Jersey Supreme Court upheld the Appellate Court decision⁹ and ordered COAH to prepare the necessary rules. COAH failed to adopt new rules, and more challenges ensued.

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

⁶ N.J.A.C. 5:94-1 and 5:95-1

⁷ In re Adoption of N.J.A.C. 5:94 and 5:95, 390 N.J. Super. 1 (2007)

⁸ In re Adoption of N.J.A.C. 5:96 and 5:97, 416 N.J. Super. 462 (2010)

⁹ In re Adoption of N.J.A.C. 5:96 and 5:97 by New Jersey Council On Affordable Housing, 215 N.J. 578 (2013)

¹⁰ In re Adoption of N.J.A.C. 5:96 & 5:97, 221 NJ 1 (2015)



had done previously. Those towns whose plans were approved by the Court received a Judgment of Compliance and Repose, the court equivalent of COAH's substantive certification.

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

On January 17, 2017, the New Jersey Supreme Court rendered a decision¹¹ that found that the period between 1999 and 2015, now known as the "gap period," when no valid affordable housing regulations were in force, generated an affordable housing obligation. This obligation required an expanded definition of the municipal Present Need obligation to include the unaddressed housing needs of low- and moderate-income households that had formed during the gap period. This meant that the Third Round municipal affordable housing obligation would now comprise the following components: Present Need (rehabilitation), Prior Round (1987-1999, new construction), Third Round Gap Need (1999-2015, new construction), and Third Round Prospective Need (2015 to 2025, new construction).

Third Round Legislative Activity

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

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

- It established a statewide 2.5% nonresidential development fee instead of requiring nonresidential developers to provide affordable housing;
- It eliminated new regional contribution agreements ("RCAs") as a compliance technique available to municipalities; previously a municipality could fund the transfer up to 50% of its fair share to so called "receiving" municipalities;
- It added a requirement that 13% of all affordable housing units be restricted to very low-income households, which it defined as households earning 30% or less of median income; and
- It added a requirement that municipalities had to commit to spend development fees within four years of the date of collection. This was later addressed in a Superior Court decision which found the four-year period begins at the time the Court approves the municipal spending plan.¹²

In July 2020, the State amended the FHA again to require, beginning in November 2020, that all affordable units that are subject to affirmative marketing requirements also be listed on the state's Affordable Housing Resource Center website.¹³ All affordable housing affirmative marketing plans are now required to include listing on the State Affordable Housing Resource Center website.

¹¹ In Re Declaratory Judgment Actions Filed by Various Municipalities, 227 N.J. 508 (2017)

¹² In the Matter of the Adoption of the Monroe Township Housing Element and Fair Share Plan, and Implementing Ordinances (2015)

¹³ <https://www.nj.gov/njhrc/>



The Fourth Round (2025-2035)

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

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

In December 2024, the Administrative Office of the Courts issued Administrative Directive #14-24, establishing procedures for implementation of the Program and for municipalities to file their Fourth Round Declaratory Judgment (“DJ”) filings, etc.

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



READINGTON'S AFFORDABLE HOUSING HISTORY

Readington Township officials and its citizenry have devoted much attention to affordable housing planning over the past 40 years. In 1978, Readington implemented zoning for “least cost housing” on two (2) substantial tracts permitting multi-family housing which responded to the Mount Laurel I decision in 1975. The tracts were approved and developed in the early 1980’s as Whitehouse Village (290 units) in Whitehouse Station and Hunter’s Crossing (418 units) near Three Bridges.

Readington Township prepared a first round (1987-1993) Housing Element/Fair Share Plan (HE/FSP) addressing a 265-unit affordable housing obligation (183 new construction/82 rehabilitation) and received first round substantive certification from COAH on June 26, 1989. Subsequently, the Township prepared a second round HE/FSP to address its cumulative (1987-1999) affordable housing obligation of 475 units (394 new construction/81 rehabilitation) and received second round certification from COAH on May 7, 1997. As the Township’s second round substantive certification was valid for six years and COAH had just adopted its third round (1987-2014) regulations, the Township filed a motion for an extension of their second round substantive certification pursuant to *N.J.A.C. 5:95-15.2* and received an extension of its second round substantive certification from COAH on February 4, 2003, amended second round certification from COAH on April 2, 2003 and another second round certification from COAH on May 11, 2005. An additional amendment to the Second Round certification was approved by COAH on November 9, 2005.

On November 28, 2005, the Township adopted its initial third round Housing Element/Fair Share Plan to address the third round Affordable Housing Obligation. The Township initially petitioned COAH on December 13, 2005. COAH did not act on the 2005 plan before the Appellate Division’s 2007 decision invalidated the first version of COAH’s third round rules. The Township adopted a 2008 HE/FSP to address COAH’s revised regulations and COAH granted substantive certification of the Township’s 2008 HE/FSP on October 14, 2009 (COAH Resolution #04-09).

Pursuant to the NJ Supreme Court’s March 10, 2015 decision, Readington Township was deemed to be a “certified” municipality. The Township was one of only approximately 60 towns that received third round substantive certification. A certified municipality is a town that received Third Round substantive certification from COAH that allows courts to be more inclined to grant applications for immunity from exclusionary zoning actions during the court review process. On July 2, 2015, the Township filed its Declaratory Judgment action with the Superior Court and on October 23, 2015, the Honorable Thomas C. Miller, P.J.Cv., extended the Township’s immunity protections which the court granted a number of times including through the present time and appointed Frank Banisch, PP, AICP as Special Master.

The Township entered into successful negotiations with FSHC, an interested party in its declaratory judgment, to identify its fair share obligation and preliminarily determine how that obligation would be satisfied. The negotiations resulted in a Settlement Agreement between the Township and FSHC that was executed by the Township on July 19, 2019. The Court issued an Order on October 15, 2019 stating that the Settlement Agreement was fair to the interests of low- and moderate-income households. On March 28, 2022, the Court approved the Township’s Third Round Housing Plan Element and Fair Share Plan and issued a Judgment of Repose. (See Appendix I.)



On January 30, 2025, the Township adopted a resolution, as required by the amended FHA, that stipulated to a Fourth Round prospective need obligation of 315, lower than the obligation calculated by DCA. The Township's stipulation was challenged, and, per the terms of the Administrative Directive, the Township and challengers entered mediation with the assistance of a Court-appointed special adjudicator. The adjudicator recommended to the Court that the Township be given a Fourth Round prospective need obligation of 504 units, and the Court issued an order on April 22, 2025, fixing the Township's Fourth Round obligation at 504 units. The Order setting forth Readington's Prospective Need obligation of 504 is under appeal. (See Appendix 2.)



AFFORDABILITY REQUIREMENTS

Affordable housing is defined under the amended FHA as a dwelling, either for sale or for rent, that is within the financial means of households of very low, low, or moderate income as income is measured within each housing region. Readington Township is in Housing Region 3, which includes the counties of Hunterdon, Middlesex, and Somerset. Moderate-income households are those earning between 50% and 80% of the regional median income. Low-income households are those with annual incomes that are between 30% and 50% of the regional median income. Very low-income households have annual incomes of 30% or less of the regional median income.

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

The regional median income is now defined in the amended FHA and continues to utilize HUD income limits on a regional basis. In the spring of each year HUD releases updated income limits, which will be reallocated to the six housing regions. It is from these income limits that the rents and sale prices for affordable units are derived. See Table 1 for 2025 income limits for Region 3.

TABLE 1. 2025 INCOME LIMITS FOR REGION 3					
Household Income Levels	1-Person Household	2-Person Household	3-Person Household	4-Person Household	5-Person Household
Moderate	\$85,920	\$98,240	\$110,480	\$122,720	\$132,560
Low	\$53,700	\$61,400	\$69,050	\$76,700	\$82,850
Very Low	\$32,220	\$36,840	\$41,430	\$46,020	\$49,710

Source: New Jersey Housing and Mortgage Finance Agency 2025 Regional Income Limits by Household Size

Tables 2 and 3 provide maximum sale prices and rents for 2024. The sample rents are gross figures, and do not include utility allowances for rental units.

TABLE 2. MAXIMUM 2024 AFFORDABLE RENTS FOR REGION 3			
Household Income Levels (% of Median Income)	1-Bedroom Unit Rent	2-Bedroom Unit Rent	3-Bedroom Unit Rent
Moderate (60%)	\$1,645	\$1,974	\$2,281
Low (50%)	\$1,371	\$1,645	\$1,901
Very Low (30%)	\$822	\$987	\$1,140

Source: AHPNJ 2024 Maximum Rent Calculator



TABLE 3. MAXIMUM 2024 AFFORDABLE SALES PRICES FOR REGION 3			
Household Income Levels (% of Median Income)	1 Bedroom Unit Price	2 Bedroom Unit Price	3 Bedroom Unit Price
Moderate (70%)	\$184,603	\$226,165	\$264,956
Low (50%)	\$125,229	\$154,916	\$182,624
Very Low (30%)	\$65,855	\$83,667	\$100,292
Source: AHPNJ 2024 Maximum Sales Price Calculator			



HOUSING PLAN ELEMENT AND FAIR SHARE PLAN REQUIREMENTS

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

- 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;
- 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;
- An **analysis of the municipality's demographic characteristics**, including, but not necessarily limited to, household size, income level, and age;
- An **analysis of the existing and probable future employment characteristics of the municipality**;
- A **determination of the municipality's present and prospective fair share of low- and moderate-income housing** and its capacity to accommodate its present and prospective housing needs, including its fair share of low- and moderate-income housing, as established pursuant to section 3 of P.L. 2024, c.2 (C.52:27D-304.1);
- A **consideration of the lands most appropriate for construction of low- and moderate-income housing** and of the existing structures most appropriate for conversion to, or rehabilitation for, low- and moderate-income housing, including a consideration of lands of developers who have expressed a commitment to provide low- and moderate-income housing;
- An **analysis of the extent to which municipal ordinances and other local factors advance or detract from the goal of preserving multigenerational family continuity** as expressed in the recommendations of the Multigenerational Family Housing Continuity Commission, adopted pursuant to paragraph (1) of subsection f. of 23 section 1 of P.L.2021, c.273 (C.52:27D-329.20);
- 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



- 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 HPE/FSP must generally also include (in an Appendix) all adopted ordinances and resolutions needed to implement the HPE/FSP.



HOUSING, DEMOGRAPHIC, AND EMPLOYMENT ANALYSIS

Housing Characteristics

The 2019-2023 American Community Survey (ACS)¹⁴ indicates that Readington has approximately 6,497 housing units, of which 181, or 2.8%, are vacant. The Township's housing stock predominantly consists of single-family detached units (75.9%) and single-family attached units (12.1%). The Township's percentage of single-family detached units is higher than that of the state (52.7%) and approximately 2.8% higher than that of Hunterdon County (73.9%). Renters occupy approximately 11.8% of all units in Readington, which is 22.4% less than the renter population in the County (15.2%) and 67.5% less than the renter population in the state as a whole (36.3%). See Table 4, Housing Units by Number of Units in Structure, for a detailed explanation of the housing units in 2023.

TABLE 4. HOUSING UNITS BY TENURE AND NUMBER OF UNITS IN STRUCTURE, 2023							
Number of Units	Owner- occupied	Percent	Rental	Percent	Vacant	Percent	Total
1, Detached	4,508	69.4%	292	4.5%	133	2.0%	4,933
1, Attached	668	10.3%	119	1.8%	-	-	787
2	45	0.7%	95	1.5%	-	-	140
3 or 4	135	2.1%	93	1.4%	-	-	228
5 to 9	89	1.4%	73	1.1%	30	0.5%	192
10 or more	105	1.6%	94	1.4%	18	0.3%	217
Other	0	0	0	0	0	0	0
Total	5,550	85.5%	766	11.8%	181	2.8%	6,497

Source: Tables B25032, DP04, 2019-2023 American Community Survey Five-Year Estimate.

Table 5, Housing Units by Year Built, illustrates the age of the Township's housing stock. Approximately 12.7% of Readington's housing stock was constructed prior to 1939. The majority of the Township's housing stock (61.2%) was constructed between 1960 and 1999.

TABLE 5. HOUSING UNITS BY TENURE AND YEAR BUILT, 2023					
Year Built	Total Units	Percent	Owner	Renter	Vacant
2020 or later	17	0.3%	10	7	0
2000 to 2019	920	14.2%	703	199	18
1980 to 1999	2,280	35.1%	2,067	183	30
1960 to 1979	1,695	26.1%	1,482	213	0
1940 to 1959	762	11.7%	686	19	57

¹⁴ The American Community Survey replaced the long-form Census as the source for much of the housing data necessary to complete this section. The Census is a one-time count of the population while this ACS is an estimate taken over five years through sampling. As such, data in the ACS is subject to a margin of error.



TABLE 5. HOUSING UNITS BY TENURE AND YEAR BUILT, 2023					
Year Built	Total Units	Percent	Owner	Renter	Vacant
1939 or earlier	823	12.7%	602	145	76
Totals	6,497	100%	5,550	766	181
Source: Tables DPo4, B25127, 2019-2023 American Community Survey Five-Year Estimate.					

The largest concentration of housing units in Readington (37.6%) contains four bedrooms, and 75.8% of all units have three or more bedrooms. For both the county and the state, the largest concentration of housing units has three and four bedrooms (67.0% for the county and 51.5% for the state). See Table 6, Number of Bedrooms per Housing Unit, for more detail.

TABLE 6. NUMBER OF BEDROOMS PER HOUSING UNIT, 2023		
Bedrooms	Number of Units	Percent
Efficiency	0	
1	149	2.3%
2	1,420	21.9%
3	2,095	32.2%
4	2,446	37.6%
5+	387	6.0%
Total	6,497	100%
Source: Table DPo4, 2019-2023 American Community Survey Five-Year Estimate.		

Table 7, Housing Values, shows that the median value of owner-occupied housing units in Readington increased by 11.1% between 2013 and 2023, a combined result of recovery from the 2008 mortgage crisis and the post-2020 pandemic real estate boom. Hunterdon County saw an even higher increase in owner-occupied home values during this same period time (23.4%). However, Readington had higher median housing values both in 2013 (\$477,800 vs. \$404,300) and 2023 (\$531,100 vs. \$498,800) than the county as a whole.

Based on the estimated value of owner-occupied homes in 2023 as provided in Table 8 and the median income information provided in Table 16, below, approximately 2,571 housing units may be affordable to moderate-income households at 80% of median income. Of those, 1,069 may be affordable to low-income households at 50% of median income, and 392 may be affordable to very low-income households at 30% of median income.

TABLE 7. OWNER-OCCUPIED HOUSING VALUES, 2013 and 2023				
Housing Unit Value	2013 Units	Percent	2023 Units	Percent
Less than \$50,000	52	0.9%	28	0.5%
\$50,000 to \$99,999	22	0.4%	48	0.9%
\$100,000 to \$149,999	120	2.0%	69	1.2%
\$150,000 to \$199,999	326	5.3%	25	0.5%



TABLE 7. OWNER-OCCUPIED HOUSING VALUES, 2013 and 2023				
Housing Unit Value	2013 Units	Percent	2023 Units	Percent
\$200,000 to \$299,999	808	13.3%	514	9.3%
\$300,000 to \$499,999	1,932	31.7%	1,812	32.6%
\$500,000 to \$999,999	2,348	38.5%	2,802	50.5%
\$1,000,000 or more	490	8.0%	252	4.5%
Total	6,098	100%	5,550	100%
Median	\$477,800		\$531,100	
Source: Table DP04, 2009-2013 & 2019-2023 American Community Survey Five-Year Estimates.				

The median rent in Readington in 2023 was \$1,832, compared to \$1,707 across Hunterdon County. Based on the estimated rents provided in Table 8, and the income information provided in Table 16, below, approximately 549 rental units may be affordable to moderate-income households at 80% of median income. Of those, 199 may be affordable to low-income households at 50% of median income, and 48 may be affordable to very low-income households at 30% of median income.

TABLE 8. COMPARISON OF READINGTON TOWNSHIP AND HUNTERDON COUNTY, GROSS RENT, 2023				
Gross Rent	Readington Township		Hunterdon County	
	Units	Percent	Units	Percent
Less than \$500	9	1.2%	343	4.5%
\$500 to \$999	28	3.7%	343	4.5%
\$1,000 to \$1,499	127	16.5%	1,922	25.1%
\$1,500 to \$1,999	185	24.1%	2,152	28.1%
\$2,000 to \$2,499	87	11.4%	1,230	16.1%
\$2,500 to \$2,999	113	14.8%	533	7.0%
\$3,000 or more	25	3.3%	479	6.3%
No Rent Paid	192	25.0%	650	8.5%
Total	766	100%	7,652	100%
Median Rent	\$1,832		\$1,707	
Source: Table DP04, 2019-2023 American Community Survey Five-Year Estimate.				

Housing is generally considered to be affordable if rents, mortgages, and other essential costs consume 28% or less of an owner-household's income or 30% or less of a renter-household's income. This percentage is lower for homeowners to account for the additional home maintenance costs associated with ownership. In Readington, 27.5% of all households in occupied units are expending more than 30% of their incomes on housing costs. The percent of renter-occupied households expending more than 30% of their incomes on housing (32.0%) is higher than the percent of owner-occupied households (26.9%). Almost one-third of renters are spending more than 30% of income on housing, which suggests that some of Readington's existing rental housing may be unaffordable to its residents, and demand for rental housing may exceed available supply.



TABLE 9. HOUSING AFFORDABILITY, 2023						
Monthly Housing Costs as Percent of Income	Owner-Occupied	Percent	Renter Occupied	Percent	All Occupied	Percent
Less than 20 Percent	2,919	52.6%	228	29.8%	3,147	49.8%
20 to 29 Percent	1,080	19.5%	101	13.2%	1,181	18.7%
30 Percent or More	1,490	26.9%	245	32.0%	1,735	27.5%
Not Computed/ No Rent Paid	61	1.1%	192	25.1%	253	4.0%
Total	5,550	100%	766	100%	6,316	100%

Source: Table DP04, 2019-2023 American Community Survey Five-Year Estimate.

In 2023, there were an estimated 19 units that had incomplete kitchen facilities and 19 units with incomplete plumbing facilities. There were no overcrowded housing units (defined as more than one occupant per room in units built before 1950). It should be noted that overcrowding is often associated with substandard housing due to overuse of facilities and is often occupied by lower-income households who share space to save on housing costs. Historically, the conditions mentioned in this paragraph have been indicators of housing deficiency, which are used to determine the number of units requiring rehabilitation.

TABLE 10. INDICATORS OF HOUSING DEFICIENCY, 2023			
Indicator	Built Before 1950 and Overcrowded	Incomplete Plumbing	Incomplete Kitchen
Number of Units	0	19	19

Source: Tables B25050, DP04, 2019-2023 American Community Survey Five-Year Estimates

Population Characteristics

The population of Readington decreased by 0.7% from 2010 to 2020, and by a smaller 0.1% between 2010 and the 2023 estimate. By contrast, Hunterdon County's population increased by 0.4% between the two censuses, and by 0.8% overall between 2010 and 2023. See Table 11, Population Growth.

TABLE 11. POPULATION GROWTH, 2010 – 2023					
	2010	2020	Percent Change	2023 (est.)	Percent Total Change
Readington Township	16,235	16,128	-0.7%	16,213	-0.1%
Hunterdon County	128,458	128,947	0.4%	129,448	0.8%

Sources: Table DP1, 2010 and 2020 US Census; Table DP05, 2019-2023 American Community Survey Five-Year Estimates

While Readington's overall population grew less than 1% between 2013 and 2023, there were large changes in several individual age cohorts, especially among children and in the senior population. The highest rate of growth was in the cohort aged 65 and older, which went from 14.8% of the population in 2013 to more than 25% in 2023, an increase of 70%. The largest drop was in the portion of the population age 19, which went from 24.9% of the population in 2013 to 20.8% in 2023, a drop of



16.5%. However, there were anomalous increases in the percentages of very young children and in young adults aged 20-24. The growth in both the number and percentages of older age cohorts contributed to Readington's 7.3% increase in median age, from 45.2 to 48.5 years. See Table 12, Age Distribution, for additional detail.

TABLE 12. AGE DISTRIBUTION, 2013 and 2023					
Age Group	2013	Percent	2023	Percent	Change in Percentage
Under 5	701	4.3%	920	5.7%	32.6%
5-9	1,054	6.5%	647	4.0%	-38.5%
10-14	1,146	7.1%	901	5.6%	-21.1%
15-19	1,133	7.0%	897	5.5%	-21.4%
20-24	679	4.2%	964	5.9%	40.5%
25-34	1,145	7.1%	1,137	7.0%	-1.4%
35-44	2,142	13.3%	1,820	11.2%	-15.8%
45-54	2,803	17.4%	2,327	14.4%	-17.2%
55-59	1,690	10.5%	1,277	7.9%	-24.8%
60-64	1,240	7.7%	1,249	7.7%	0.7%
65-74	1,340	8.3%	2,231	13.8%	66.3%
75-84	778	4.8%	1,234	7.6%	58.3%
85+	268	1.7%	609	3.8%	123.5%
Total	16,119		16,213		0.6%
Median Age	45.2		48.5		7.3%

Source: Table DP05, 2009-2013 and 2019-2023 American Community Survey Five-Year Estimates

Household Characteristics

A household is defined by the U.S. Census Bureau as those persons who occupy a single room or group of rooms constituting a housing unit; however, these persons may or may not be related. Table 13, Household Size, shows that, between 2013 and 2023, the average household size dropped from 2.68 to 2.56, as the number of one- and two-person households grew and the number of three-person households dropped significantly. Two-person households continue to make up the largest percentage of households in the Township.

TABLE 13. HOUSEHOLD SIZE, 2013 and 2023				
Household Size	2013		2023	
	Households	Percent	Households	Percent
1 Person	1,164	19.4%	1,394	22.1%
2 People	2,041	34.0%	2,456	38.9%
3 People	1,344	22.4%	911	14.4%



TABLE 13. HOUSEHOLD SIZE, 2013 and 2023				
Household Size	2013		2023	
	Households	Percent	Households	Percent
4 or More People	1,452	24.2%	1,555	24.6%
Total Households	6,001	100%	6,316	100%
<i>Sources: Table S2501, 2009-2013 and 2019-2023 American Community Survey Five-Year Estimates</i>				

As a subset of households, a family is identified as a group of people including a householder and one or more individuals related by blood, marriage or adoption, all living in the same household. In 2023, there were 6,316 occupied households in the Township, with an average of 2.56 people per household. Approximately 65% of the households are composed of married couples with or without children. Approximately 27.5% of the Township's households are non-family households, which include individuals living alone. See Table 14, Household Composition.

TABLE 14. HOUSEHOLD COMPOSITION, 2023		
Household Type	Households	Percent
Family households	4,580	72.5%
Married-couple family	4,105	65.0%
Male householder, no spouse present	139	2.2%
Female householder, no spouse present	336	5.3%
With Children Under 18	1,753	27.8%
Nonfamily households	1,736	27.5%
Householder living alone	1,394	22.1%
Total Households	6,316	100%
<i>Source: Table S2501, 2019-2023 American Community Survey Five-Year Estimates</i>		

When the number of bedrooms in a unit (from Table 6 above) is considered vs. the size of households in Readington, there appears to be a mismatch: There are many more smaller households (three people or fewer; 75.4% of all households) than there are smaller units (one or two bedrooms make up 24.2% of all units; one-, two-, or three-bedroom units make up 56.4%). This comparative shortage of smaller homes may be forcing some empty nesters and young adults without children to consider other locations when seeking smaller-sized housing, or to occupy housing that is larger than their needs. Table 15, Unit Size vs. Household Size, provides more detail.

TABLE 15. UNIT SIZE vs. HOUSEHOLD SIZE, 2023					
Unit Size	Number of Units	Percent of Total Units	Household Size	Number of Households	Percent of Total Households
1 Bedroom	149	2.3%	1 Person	1,394	22.1%
2 Bedrooms	1,420	21.9%	2 People	2,456	38.9%
3 Bedrooms	2,095	32.2%	3 People	911	14.4%
Total	3,664	56.4%	Total	4,761	75.4%



Income Characteristics

In 2023, 50% of households in Readington had incomes of \$150,000 or more. The median income was \$150,021 for households and \$176,659 for families. Comparable figures for the County were \$139,453 for households and \$166,462 for families. Table 16, Household Income by Income Brackets, further details household income in the Township.

TABLE 16. HOUSEHOLD INCOME BY INCOME BRACKETS, 2023		
	Households	Percent
Less than \$10,000	107	1.7%
\$10,000-\$14,999	38	0.6%
\$15,000-\$24,999	114	1.8%
\$25,000-\$34,999	139	2.2%
\$35,000-\$49,000	462	7.3%
\$50,000-\$74,999	816	12.9%
\$75,000-\$99,999	538	8.5%
\$100,000-\$149,999	942	14.9%
\$150,000-\$199,999	879	13.9%
\$200,000 or more	2,281	36.1%
Total	6,316	100%
Median Income	\$150,021	-
<i>Source: Table S1901, 2019-2023 American Community Survey Five-Year Estimates</i>		

The Township's poverty rate for individuals (2.8%) is less than that of the County (3.8%), and the Township's poverty rate for families (1.1%) is below than the County's rate (3.6%). See Table 17, Individual and Family Poverty Rates, for the comparison.

TABLE 17. INDIVIDUAL AND FAMILY POVERTY RATES, 2023		
Location	Individuals	Families
Readington Township	2.8%	1.1%
Hunterdon County	3.8%	3.6%
<i>Source: Tables S1701, S1702, 2019-2023 American Community Survey Five-Year Estimates</i>		

Employment Characteristics

The number of jobs in Readington is higher, at 8,904, than the number of employed residents in the Township (7,714). Table 18, Covered Employment By Sector, shows the breakdown by sector of jobs available in Readington Township. The largest category of available jobs is the Finance/Insurance category, which represents almost one-third of jobs in the Township. A distant second is the Construction sector, which offers 14.7% of the Township's jobs, followed by Professional/Technical, with 8.6% of jobs.



TABLE 18. COVERED EMPLOYMENT BY SECTOR, 2022		
	Jobs	Percent
Agriculture	88	1.0%
Mining/Resource Extraction	16	0.2%
Construction	1,318	14.7%
Manufacturing	434	4.8%
Wholesale Trade	337	3.8%
Retail Trade	460	5.1%
Transportation/Warehousing	494	5.5%
Information	35	0.4%
Finance/Insurance	2,591	29.0%
Real Estate	86	1.0%
Professional/Technical	772	8.6%
Management	258	2.9%
Admin/Waste Remediation	565	6.3%
Education	530	5.9%
Health/Social	164	1.8%
Arts/Entertainment	87	1.0%
Accommodations/Food Services	256	2.9%
Other Services	393	4.4%
Public Administration	83	0.9%
Total Covered Employment	8,949	100%
<i>Source: OnTheMap, U.S. Census Center for Economic Studies, 2022</i>		

Jobs-Housing Ratio

A municipality's jobs-housing ratio is a rough indicator of the degree to which the municipality has been able to generate sufficient housing to accommodate its workers. A ratio of between 0.75 and 1.5 is generally considered to indicate a healthy balance between the number of jobs in a municipality and the municipality's ability to house everyone who works there who also wishes to live there.¹⁵ The ability to house workers locally enables them to spend less time commuting, reduces traffic congestion, and reduces the greenhouse gas emissions associated with commuting by automobile.

Based on Tables 4 and 18 above, Readington has a jobs-housing ratio of 1.38, at the higher end of the healthy range. This means that the Township serves as something of a jobs destination for the surrounding area. Data from the Center for Economic Studies confirms this: 8,317 people commute into Readington to work (most of them to jobs along the Route 78 and Route 22 corridors), while 7,714 Readington residents travel outside the Township for work. The high number of inbound commuters

¹⁵ <https://enviroatlas.epa.gov/enviroatlas/datafactsheets/pdf/supplemental/employmenthousingratio.pdf>



may be an indication that some workers are not able to find housing in the Township that suits their needs. Should the Township be able to confirm this, and to take steps to address it, a reduction in traffic and related greenhouse gas emissions may be possible.

Population and Employment Projections

The North Jersey Transportation Planning Authority (NJTPA), the Metropolitan Planning Organization (MPO) that contains Readington as well as the remainder of Hunterdon County, published population and employment projections for the year 2050. The NJTPA projects that the Township's population and employment will increase by 4.7% and 12.5%, respectively, from 2015 to 2050. As Table 19, Population, Household and Employment Projections shows, these projected growth rates are higher than those of the County overall.

TABLE 19. POPULATION AND EMPLOYMENT PROJECTIONS, 2015 – 2050						
	Readington Township			Hunterdon County		
	2015	2050	% Change	2015	2050	% Change
Population	16,241	17,011	4.7%	126,250	132,858	5.2%
Employment	7,707	8,670	12.5%	53,115	56,243	5.9%
<i>Sources: NJTPA Regional Transportation Plan. Forecasts adopted August 2020</i>						

The FHA requires that Housing Plans include a 10-year projection of new housing units based on the number of building permits, development applications approved, and probable developments, as well as other indicators deemed appropriate (N.J.S.A. 52:27D-310.b). Based on the data in Table 20, annual net new residential units in Readington during the years 2014 through 2023 averaged approximately 59 units.

Readington may see about 695 new dwellings by the year 2035. Factors such as the business cycle and rate of residential unit absorption may result in a lower or higher actual number. Table 20, Housing Projections, provides an estimate of anticipated residential growth based on the extrapolation of prior housing activity into the future and the proposed inclusionary developments in this Plan.

TABLE 20. HOUSING PROJECTIONS			
Year	Building Permits Issued	Demolitions	Net New Dwellings
2014	61	3	56
2015	54	4	50
2016	28	2	26
2017	31	7	24
2018	38	3	35
2019	113	2	111
2020	9	2	7
2021	260	4	256



TABLE 20. HOUSING PROJECTIONS			
Year	Building Permits Issued	Demolitions	Net New Dwellings
2022	8	2	6
2023	18	1	17
Total	618	30	588
Average	61.8	3	58.8
<i>Ten-Year Projection, Background Growth</i>			588
<i>Ten-Year Projection, Including Units in This Plan</i>			765
<i>Source: NJDCA Construction Reporter, Housing Units Authorized by Building Permits for New Construction and Demolition Permits</i>			

Consideration of Lands Appropriate for Affordable Housing

As part of this Plan, Readington Township has considered land that has or can secure public sewer and water, and is appropriate for the construction of very low-, low- and moderate-income housing. Although Readington has known contaminated sites and many environmental constraints, including wetlands, floodplains and steep slopes, neither these environmentally sensitive lands nor contaminated sites will preclude the Township from addressing its affordable housing obligation. Available land appropriate for affordable housing is further subject to the limited additional firm water and sewer capacity approved by the New Jersey Department of Environmental Protection (“NJDEP”) and by the Township’s fiscal capabilities to address excess demand beyond the existing capacity of utility infrastructure. Thus the Township will require the continuation of its Third Round durational adjustment, until such time as sufficient water and sewer capacity become available for its remaining unbuilt Third Round compliance mechanisms.

Consistent with smart growth planning principles, the Township has elected to concentrate the majority of its affordable housing in proximity to one of its primary transportation corridors, Route 22, and in the villages of Whitehouse Station and Three Bridges. These areas of the Township provide the greatest number of employment opportunities, services and access to mass transit, including the New Jersey Transit Raritan Valley line and the County’s LINK bus service.

The Township believes that the sites and mechanisms proposed in this document represent the best and most appropriate options for affordable housing development. These mechanisms entirely satisfy the Township’s Fourth Round affordable housing obligation as established by the Court.

***Consistency with the State Development and Redevelopment Plan***

The 2024 amendment to the FHA added a requirement that a municipality's Housing Plan Element include an analysis of consistency with the State Development and Redevelopment Plan (SDRP), including water, wastewater, stormwater, and multi-modal transportation, based on guidance and technical assistance from the State Planning Commission. Much of the Township is in state Planning Areas 3, 4, and 5, where new development is only encouraged in State Plan-designated centers. The Township's Fourth Round Plan is consistent with the SDRP, in that it concentrates new housing development in the northern part of the Township, in State Planning Area 2, the Suburban Planning Area, where there is already access to infrastructure and amenities and where redevelopment is encouraged.

Consistency with Recommendations of Multigenerational Family Housing Continuity Commission

The FHA requires an HPE/FSP to provide 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, established pursuant to paragraph (1) of subsection f. of 23 section 1 of P.L.2021, c.273 (C.52:27D-329.20). As of April 2025, no recommendations have been issued by the Commission.



FAIR SHARE PLAN

READINGTON'S AFFORDABLE HOUSING OBLIGATION

As noted above, there are four components to a municipality's affordable housing obligation: the Fourth Round Present Need obligation, also known as the Rehabilitation Share (the terms "Present Need" and "Rehabilitation Share" are used interchangeably), the Prior Round obligation, the Third Round obligation, which includes both the "Gap" Present Need obligation (1999-2015) and the Third Round Prospective Need obligation (2015-2025), and the Fourth Round Prospective Need obligation. Present Need resets with each round of affordable housing based on census data on the number of deficient housing units existing at the beginning of that round that potentially are occupied by low- and moderate-income households. The obligations in the Prior Round, Third Round, and Fourth Round are also known as "Prospective Need," which refers to the provisions of new affordable housing necessary to address the demand based on regional population growth.

Rehabilitation Obligation

The rehabilitation obligation can be defined as an estimate of the number of deteriorated housing units existing in Readington Township that are occupied by low- and moderate-income households. Through mediation, and as fixed in the May 2025 Court order, the Township's Fourth Round Rehabilitation obligation is 50 units.

Prior Round Obligation

The Prior Round obligation is the cumulative 1987 through 1999 new construction affordable housing obligation. This time period corresponds to the First and Second Rounds of affordable housing. FSHC's May 2016 calculations, as well as the Township's Settlement Agreement with FSHC, establish Readington's Prior Round obligation as 394 units. The May 2016 calculations adhere to the Prior Round obligations as calculated in 1993-1994 and published by COAH in 2008.

Third Round Obligation

The Third Round obligation includes the portion of the Third Round (1999- 2015) that had already passed in 2015 when the Court issued its Mount Laurel IV decision, as well as a 10-year projection from that point (2015-2025). The 10-year period is derived from the FHA, which, when amended in 2001, set the projection for this length of time (N.J.S.A. 52:27D-310). As established by the Township's 2019 Settlement Agreement with FSHC, Readington's Third Round obligation (1999-2025) was 1,045 units.

Fourth Round Obligation

The amended FHA defines Prospective Need as "a projection of housing needs based on development and growth which is reasonably likely to occur in a region or municipality." The Township's Fourth Round Prospective Need of 504 units was agreed to by the Township after mediation, and fixed by Court Order of April 22, 2025, and Statement of Reasons dated May 15, 2025.



READINGTON'S AFFORDABLE HOUSING PLAN

Satisfaction of the Rehabilitation Obligation

As stated above, through mediation and fixed by Court order, Readington's Fourth Round Rehabilitation obligation is 50 units. In order to address the obligation, the Township will utilize Hunterdon County's Home Improvement Loan Program and Community Development Block Grant Program and will utilize the County as the administrative agent of the program. Additionally, the Township will continue to operate a supplementary rehabilitation program in order to expand the reach of rehabilitation assistance and to ensure it is available to renter-occupied households. The Township's in-house Housing Coordinator administers the Township's rehabilitation program in conformance with N.J.A.C. 5:93-5.2. (See Appendix 3 for the operating manual.)

All rehabilitated units will comply with the definition of a substandard unit in N.J.A.C. 5:93-5.2(b) as *"a unit with health and safety code violations that require the repair or replacement of a major system."* Major systems include weatherization, roofing, plumbing, heating electricity, sanitary plumbing, lead paint abatement and/or load bearing structural systems. All substandard units rehabilitated through either program must be occupied by low- or moderate-income households, and after rehabilitation must meet the applicable construction code. All rehabilitated units will be subject to 10-year affordability controls, either in the form of a lien on owner-occupied units or a 10-year deed restriction on renter-occupied units.

All rehabilitations must have an average per-unit hard cost of \$10,000.

Satisfaction of the Prior Round Obligation

As confirmed in the Settlement Agreement, Readington's Prior Round obligation (1987-1999) is 394 units. COAH permits new construction credits and bonuses addressing a First or Second Round affordable housing obligation to be used to address the Prior Round obligation.

In addition to satisfying the total obligation, the Township must also adhere to a minimum rental obligation and maximum number of age-restricted units.

TABLE 21. SUMMARY OF PRIOR ROUND OBLIGATION OF 394				
Compliance Mechanism	Type	Credits	Bonuses	Total
Regional Contribution Agreement (164 of 188)		164		164
Credits Without Controls		32		32
100% Affordable Development				
ECHO units	Age-restricted Rental	4		4
Calio House	Family Rental	1	1	2
Willows at Whitehouse Station (30 of 72)	Family Rental	30	30	60
Inclusionary Development				
Whitehouse Village	Family For-Sale	14		14
Cushetunk Manor	Family Rental	12	12	24



TABLE 21. SUMMARY OF PRIOR ROUND OBLIGATION OF 394				
Compliance Mechanism	Type	Credits	Bonuses	Total
Hartman	Family Rental	15	15	30
Alternative Living Arrangements				
Anderson House	Supportive Housing	6	6	12
ARC of Hunterdon	Group Homes	14	14	28
Allies	Group Homes	13	13	26
Total		305	90	396
Surplus Above Obligation of 394				2

As demonstrated in the table above, the Township has satisfied its Prior Round obligation with regional contribution agreements, credits without controls, family for-sale and rental projects, senior rental units, and group home facilities. Additionally, it has satisfied its obligation to provide a minimum number of rental units and no more than a maximum number of age-restricted units. All crediting documentation for the Prior Round has been provided as part of Third Round compliance and has been approved by the Court. It is available for inspection upon request.

REGIONAL CONTRIBUTION AGREEMENT

COAH's Third Round rules permit credit for a Prior Round RCA where funds were previously transferred. Readington Township entered into, and COAH previously approved, RCAs with three municipalities: Carteret Township – 116 units; Bound Brook Borough – 57 units; and Manville Borough – 15 units. The Township has completed all RCA payments to all three receiving municipalities. These RCA units will contribute 164 credits (out of 188 RCA total credits) toward the prior round obligation. Additionally, 28 of the units transferred to Carteret are rental units and thus satisfy a portion of the rental obligation. Pursuant to N.J.A.C. 5:97-3.5(a), transferred rental units are not eligible for rental bonus credits.

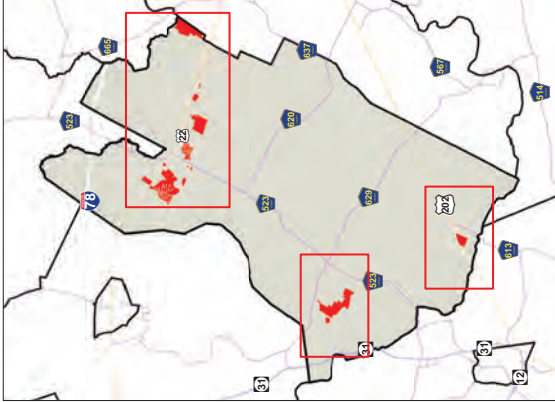
CREDITS WITHOUT CONTROLS

The Township received Court approval for 32 units of credit against its Prior Round obligation under the “credits without controls” program. Under this regulation, credits for units constructed between April 1, 1980, and December 15, 1986, are acceptable if they meet certain criteria, including being occupied by income-eligible households and having a market resale value that would be affordable to a moderate-income buyer. The Township provided all required documentation to demonstrate that 32 units were creditworthy under this program.

Affordable Housing Compliance Plan Map

LOCATION:
Readington Township, Hunterdon County, NJ

DATE:
March 2020



KEY MAP

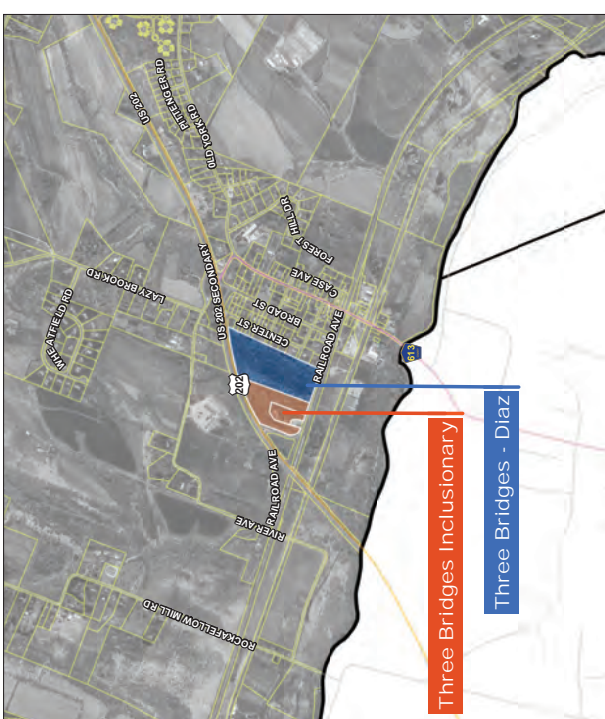
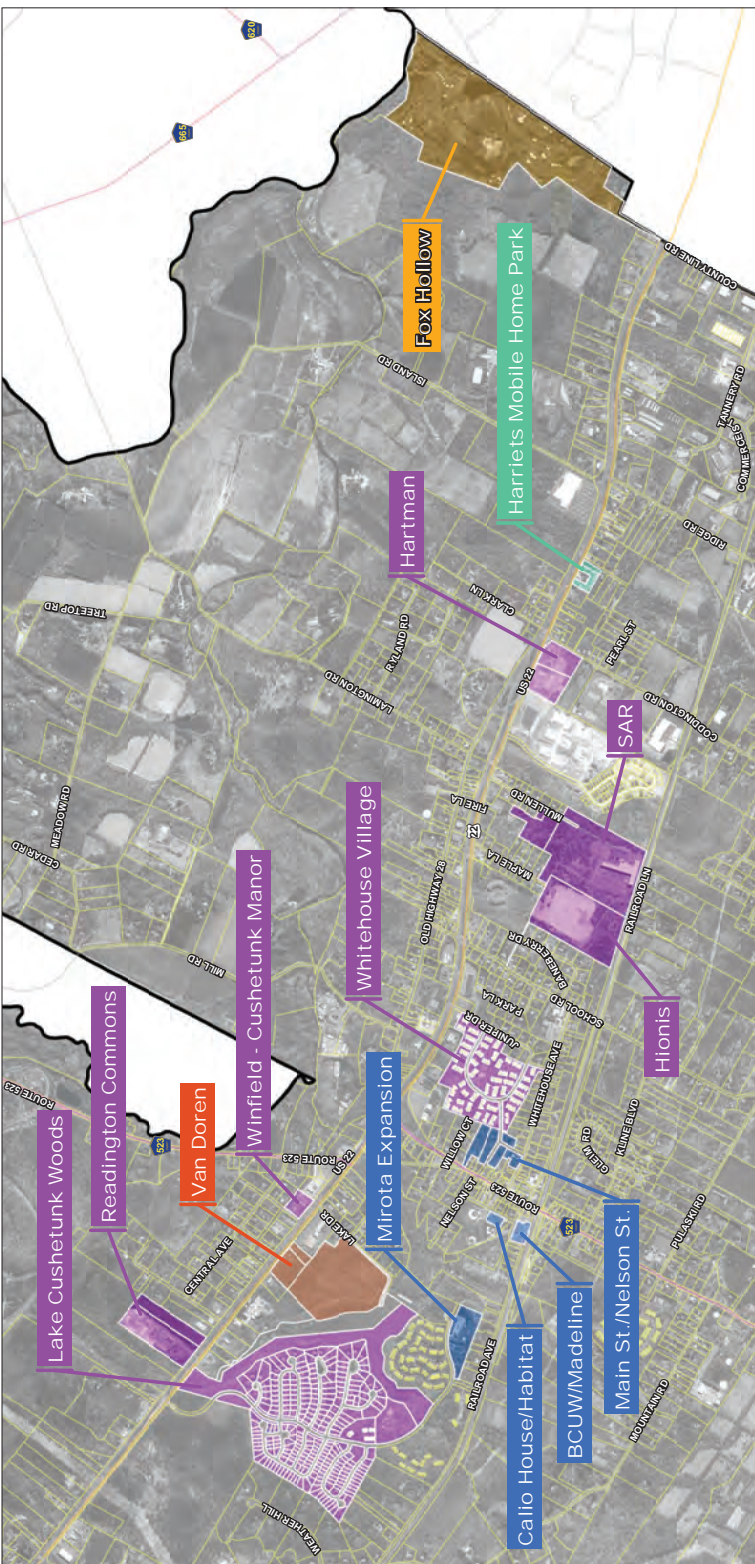
Legend

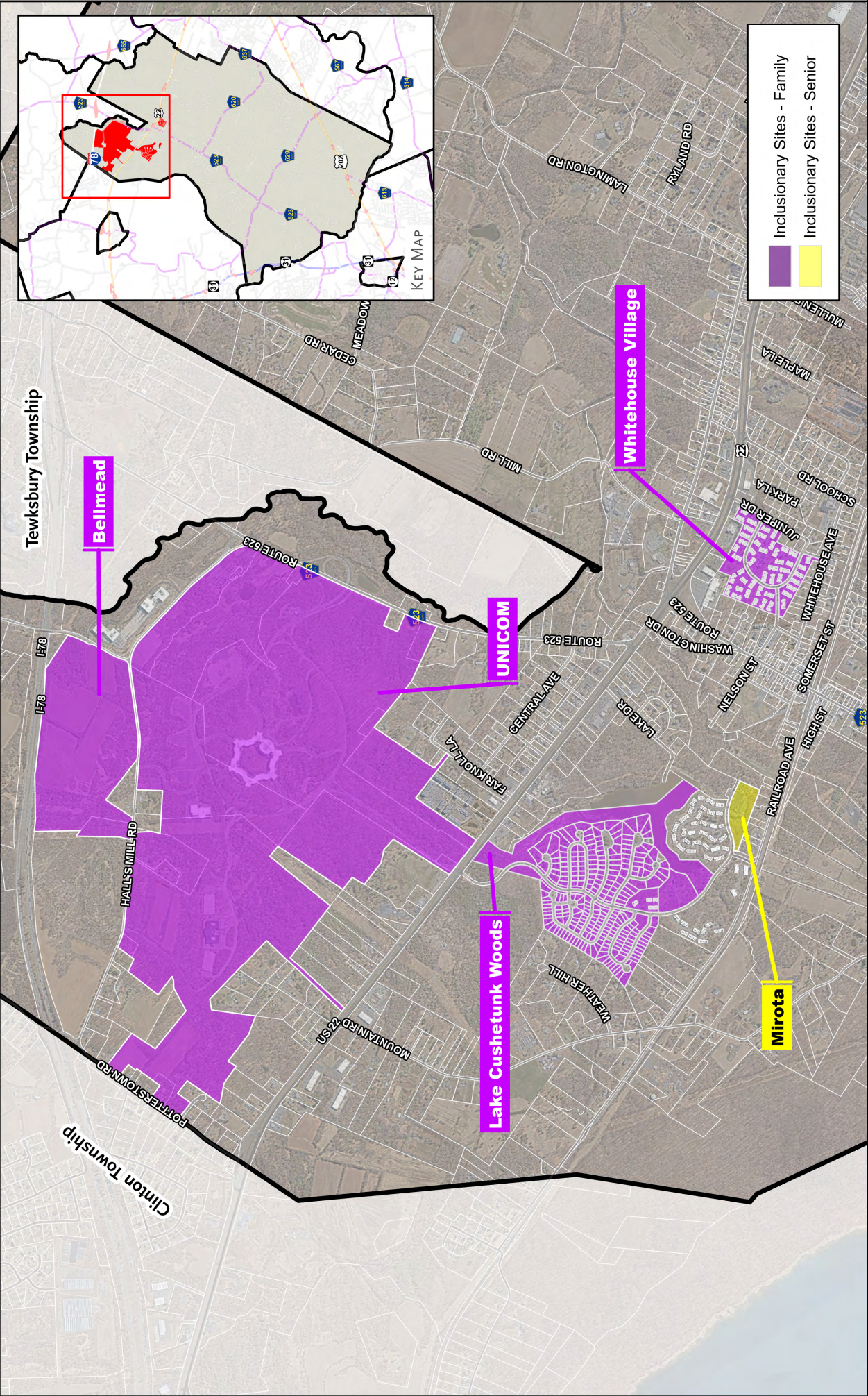
Affordable Housing Sites

- Inclusionary Sites - Family
- Inclusionary Sites - Senior
- Municipally-Sponsored
- Market-to-Affordable
- Inclusionary Overlay



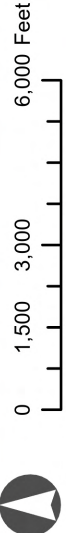
Clarke Caton Hintz
Architecture
Planning
Landscape Architecture





Readington Township Fourth Round Housing Element and Fair Share Plan

Affordable Housing Sites



Clarke Caton Hintz ● ● ●
Architecture
Planning
Landscape Architecture

LOCATION: Readington Township, Hunterdon County, NJ
DATE: June 2025



100% AFFORDABLE HOUSING PROJECTS

ECHO

Readington Township purchased four Elder Cottage Housing Opportunity (“ECHO”) housing units between 1994 and 1996 and located them on lots through the Township. ECHO units are permitted as conditional uses in the Rural Residential (RR) and Village Residential (VR) zoning districts. The ordinance permits small, modular, self-contained units to be installed as accessory uses to pre-existing dwellings subject to certain bulk and design requirements. The ECHO units are restricted to senior citizen and/or disabled residents who are related to the occupants of the principal dwelling. When the ECHO units are vacated they are removed from the property for use elsewhere when the need arises.

Rents of the ECHO units were based on Section 8 income guidelines and consistent with COAH rules. While the ECHO units are no longer in use, the Township received specific authorization from COAH to utilize its Affordable Housing Trust Fund for the acquisition of the ECHO units and for credit toward the Prior Round obligation.

Calio House

Calio House is an existing one-family affordable rental dwelling unit located at 17 James Street (Block 21.12, Lot 25) in Whitehouse Station. The Township purchased and rehabilitated the house in 1992 and placed 20-year affordability controls on the unit in 1996. Because the affordable rental unit satisfies a portion of the rental obligation, it is eligible for a rental bonus credit for a total of two credits toward the prior round obligation. This development was previously approved by COAH in 2009 when the Township received substantive certification for its 2008 HE/FSP.

Willows at Whitehouse Station

Readington Township addressed a portion of its Prior Round obligation through the municipally sponsored and 100% affordable development of 72 affordable family rental units on a 7.45-acre parcel located at 100 Nelson Street in Whitehouse Station (Block 32, lot 12, and Block 34, lots 8, 10, and 11). Readington Township donated the site to the affordable housing provider, The Ingerman Group. Ingerman was successful in obtaining 9% tax credit financing from HMFA in the 2017 funding cycle. The project received certificates of occupancy in 2019, and is deed-restricted for 45 years. The Township is claiming 30 of the total 72 units, plus 30 rental bonus credits, towards its Prior Round obligation.

INCLUSIONARY DEVELOPMENT

Whitehouse Village

Whitehouse Village (Block 34, Lot 36) is a completed inclusionary development with 290 family for-sale units. Affordability controls were placed on 14 for-sale units between June 1987 and August 1989 with certificates of occupancy issued between June 1987 and July 1989. Whitehouse Village provides seven low- and seven moderate-income units. This development was previously approved by COAH in 2009 when the Township received substantive certification for its 2008 HE/FSP.



Winfield-Cushetunk Manor

The Readington Township Zoning Board of Adjustment approved a mixed-use development in May 2009 on Block 8, Lot 3 composed of commercial uses on the first floor and 12 affordable family rental apartments on the second floor. The 2.51-acre property is located at the northeast quadrant of the Route 22 and Haver Place intersection and is bounded by commercial and office uses. The affordable units are administered by the Township's in-house Housing Coordinator. Certificates of occupancy were issued in March 2011. The income mix for the units is two very-low income units, four low-income units and six moderate-income units. This development, along with 12 rental bonuses, was previously approved by COAH in 2009 when the Township received substantive certification for its 2008 HE/FSP.

Hartman

The Readington Township Zoning Board of Adjustment approved a mixed-use development in July 2010 on Block 36, Lots 47 and 48 composed of commercial uses on the first floor and 15 affordable family rental dwelling units, both above the commercial uses (apartments) and townhouses in a stand-alone building. All of the affordable family rental dwelling units received their certificates of occupancy in 2019 and are occupied. The affordable units are administered by the Township's in-house Housing Coordinator. The income mix for the units is two very-low income units, seven low-income units and six moderate-income units. The Township is claiming 15 rental bonus credits in addition to the 15 unit credits from this project.

ALTERNATIVE LIVING ARRANGEMENTS

Anderson House

The Anderson House, located on Route 523 (Block 42, Lot 8.02) is a transitional recovery facility for women with alcohol and controlled substance addictions. The facility is licensed and regulated by the NJDCA as a Class C Boarding Home and as such, the facility meets the definition of alternate living arrangement as defined at N.J.A.C. 5:93-5.8. In 1997 the Township provided financial assistance to facilitate an expansion of the facility and in return Anderson House agreed to a 30-year affordability deed restriction for six of the seven new bedrooms, which are reserved for very low-income individuals. Anderson House is responsible for affirmatively marketing the facility. The Anderson House project was previously approved by COAH in 2009 when the Township received substantive certification for its 2008 HE/FSP, and provides six rental bonus credits.

ARC of Hunterdon

ARC currently operates six group home facilities for a total of 14 bedrooms which equate to 14 eligible affordable housing units/credits (credit is by the bedroom). While the group homes are predominantly two-bedroom units, two group homes contain three bedrooms. Affordability controls were first imposed in December 2000. Each of the group homes is currently licensed by New Jersey Department of Human Services, Division of Developmental Disabilities ('DDD') and is not age-restricted. The group homes provide four very low-, eight low-, and two moderate-income units. The group homes are located at the following addresses:

- 211 Nuthatch Court (Block 95, Lot 12.211)



- 371 Burdock Court (Block 95, Lot 12.371)
- 271 Kingbird Court (Block 95, Lot 12.271)
- 285 Kingbird Court (Block 95, Lot 12.285)
- 405 Ferncrest Court (Block 95, Lot 12.405)
- 185 Milkweed Court (Block 95, Lot 12.185)

The ARC group homes, and 14 associated rental bonus credits, were previously approved by COAH in 2009 when the Township received substantive certification for its 2008 HE/FSP.

Allies, Inc.

Allies currently operates a total of six group home facilities in the Township, totaling 13 COAH eligible units (credit per bedroom). While most of the group homes are two-bedroom units, there is one three-bedroom unit. Affordability controls started between October 2001 and September 2010. Each of these facilities is currently licensed by the New Jersey Department of Human Services, Division of Developmental Disabilities (DDD) and is not age-restricted. These group homes, whose addresses are listed below, will contribute 13 credits as well as 13 rental bonuses:

- 347 Pheobe Court (Block 95, Lot 12.347)
- 55 Junco Court (Block 95, Lot 12.055)
- 246 Nuthatch Court (Block 95, Lot 12.246)
- 203 Milkweed Court (Block 95, Lot 12.203)
- 62 Junco Court (Block 95, Lot 12.062)
- 296 Kingbird Court (Block 95, Lot 12.296)

The Allies group homes were previously approved by COAH in 2009 when the Township received substantive certification for its 2008 HE/FSP.

Prior Round Summary

The Township has met its 394-unit Prior Round obligation with regional contribution agreements, family and senior rentals, family sale units, and alternative living arrangements. In addition, the Township has met its formula obligations for minimum rental units and maximum age-restricted units.

TABLE 22. PRIOR ROUND CREDIT SUMMARY		
	Required	Provided
Prior Round Total Credits	394	396
Prior Round Total Units	-	305
Prior Round Rental	99 (min.)	123*
Prior Round Senior	98 (max.)	4
Prior Round Surplus Credits		2

* Includes 28 rental RCA units completed in Carteret



Satisfaction of the Third Round Obligation

Although the Settlement Agreement established a Third Round obligation of 1,045 units, the Township received a Court-approved durational adjustment of this obligation pursuant to N.J.A.C. 5:93-4.3(c), as a result of limited additional firm water and sewer capacity approved by NJDEP. The durational adjustment is only applied to Readington's Third Round obligation, allowing the Township to reserve water and sewer capacity to fully address its Prior Round obligation and a portion of its Third Round obligation. The Township reserves the right to demonstrate through a fiscal analysis as described in N.J.A.C. 5:93-4.3(d) that the cost of providing additional water and sewer, above and beyond the commitment to address the full Prior Round obligation, to sites identified to address the Third Round obligation, is cost-prohibitive to the Township, thus limiting the Township's "fiscal responsibility of providing water and/or sewer" to these sites.

The New Fair Housing Act "shall not be construed to require a municipality to fund infrastructure improvements for affordable housing projects beyond any commitments made in a fair share plan and housing element that has been provided with compliance certification." The Township makes no commitment to fund any infrastructure and nothing in this HPE/FSP shall be construed to commit the Township to fund infrastructure for any outstanding project or site.

The Township's Third Round durational adjustment reduces the original Third Round obligation into a non-deferred Third Round obligation of 783, which the Township has the current capacity to achieve. The non-deferred Third Round obligation of 783 is composed of 587 credits, not including any "durational adjustment sites," plus 196 of the total 262 qualifying bonus credits. As stipulated in the Settlement Agreement, the Township agrees that if and when the "durational adjustment sites" become realistic and are developed, the Township may claim additional bonus credits to which it would be entitled had the units in question come from non-deferred compliance mechanisms.

The table below summarizes the Township's Third Round compliance plan, including updates since its 2020 HPE/FSP was adopted. As demonstrated in the table, the Township has satisfied its Third Round obligation, with the exception of 17 group home bedrooms which it has a plan to replace, with Prior Round residual credits, extension of controls, alternative living arrangements, market-to-affordable program, municipally sponsored housing, inclusionary zoning, and durational adjustment sites. All crediting documentation for the Township's Third Round compliance mechanisms has been provided as part of Third Round compliance, and has been approved by the Court. It is available for inspection upon request.

TABLE 23. SUMMARY OF THIRD ROUND OBLIGATION OF 1,045				
Compliance Mechanism	Type	Credits	Bonuses	Total
Regional Contribution Agreement (24 of 188)		24		24
100% Affordable Development				
Mirota	Age-restricted Rental	60		60
Habitat for Humanity James Street	Family For-sale	2		2
Willows at Whitehouse Station (42 of 72)	Family Rental	42	42	84
Dobozynski Farm	Family Rental	1		1



TABLE 23. SUMMARY OF THIRD ROUND OBLIGATION OF 1,045				
Compliance Mechanism	Type	Credits	Bonuses	Total
BCUW/Madeline Housing Partners	Age-restricted Rental	20		20
BCUW/Madeline Housing Partners	Special-Needs	23	23	46
Apartments at Three Bridges	Family Rental	80	75; cap (was 65)	145
Inclusionary Development				
Lake Cushetunk Woods	Family For-Sale	84		84
Plaza 22/SAVE Associates – NEW	Family/Special Needs	2		2
Camelot at Readington	Family Rental	48	48	96
The Ridge at Readington	Family Rental	64	64	128
Fox Hollow	Family For-sale	48		48
Alternative Living Arrangements				
Community Options	Group Home	4	4	8
ARC of Hunterdon	Group Homes	6	6	12
Allies	Group Homes	0 (was 17)	0 (was 10; reassigned)	0 (was 27)
Market-to-Affordable				
Township-Wide Program	Family For-sale	25		25
Harriet's Mobile Home Park	Family For-sale	22		22
Extensions of Controls	Family For-sale	13		13
Durational Adjustment Sites				
Mirota Expansion	Age-Restricted	80		80
Van Doren	Family	41		41
Hionis	Family	33		33
Three Bridges	Family	42		42
Surplus from Prior Round				2
Total		764	262	1,028
Shortfall (1,045-1,028)		17		17

Non-Deferred Third Round Obligation

The Township will apply the following credits and reductions to this portion of its Third Round obligation from sites that already have been developed and/or have been approved and have adequate water and sewer capacity (or centralized on-site alternative wastewater treatment) existing or anticipated in the near future to proceed with development. All required crediting documentation for



Third Round compliance mechanisms has previously been provided, and approved by the Court. It is available for inspection upon request.

PRIOR ROUND RESIDUAL CREDITS (1987-1999)

Regional Contribution Agreement Residual Credits (24 of 188)

Please see discussion of this agreement under Satisfaction of the Prior Round Obligation. The Township will use the remaining 24 credits towards satisfaction of its Third Round obligation.

Lake Cushetunk Woods

Lake Cushetunk Woods is an existing inclusionary development with 84 family affordable for-sale units. Appropriate affordability controls were placed on the units between June 1995 and February 1996 with certificates of occupancy issued between June and October 1995. The development provides 44 low-income units and 40 moderate-income units. This development was previously approved by COAH in the 2008 Plan.

Mirota (LSM)

Stephen R. Mirota Senior Citizen Residence (Mirota) is an existing 100% affordable senior rental building consisting of 60 units that was funded through a variety of sources, including a partial mortgage (\$2.5 million) from New Jersey Housing and Mortgage Finance Agency (NJHMFA), \$400,000 from the Township Affordable Housing Trust Fund, \$715,000 from New Jersey Department of Community Affairs (NJDCOA) and the remaining amount from private equity sources. Mirota was completed in August 1998 and is owned and administered by Lutheran Social Ministries of New Jersey, Inc. (LSMNJ). Mirota is located within the Lake Cushetunk Woods neighborhood (Block 21.05, Lot 2). This project was previously approved by COAH in 2009 when the Township received substantive certification for its 2008 HE/FSP.

EXTENSION OF CONTROLS PROGRAM

Whitehouse Village

Whitehouse Village (Block 34, Lot 36) is a completed inclusionary development with 290 family for-sale units. Affordability controls were placed on 14 for-sale units between June 1987 and August 1989 with certificates of occupancy issued between June 1987 and July 1989.

Readington Township initiated a program to extend the affordability controls on 10 existing affordable units in Whitehouse Village, and has now completed the extension of affordability controls on 13 units. The affordability controls on the units provide extensions through 2047. The 13 units with extended controls include seven low-income units and six moderate-income units.



ALTERNATIVE LIVING ARRANGEMENTS

ARC Hunterdon

ARC Hunterdon is the current owner of units located at 399 Ferncrest Court (Block 95, Lot 12.399), 401 Ferncrest Court (Block 95, Lot 12.401), and 5 Owl Court (Block 95, Lot 12.005) in the Hunter's Crossing neighborhood. Each two-bedroom group home is currently licensed by New Jersey Department of Human Services, Division of Developmental Disabilities (DDD) and is not age-restricted. The Township has placed a minimum 30-year affordable housing deed restriction on each unit. The group homes will provide a total of six very low-income bedroom units, and allow the Township to claim six associated rental bonus credits. The Township adopted a bond ordinance to provide \$140,000 towards the purchase and renovation of two of these group homes, and expended \$70,000 from the Affordable Housing Trust Fund towards the purchase and renovation of the third group home.

Bergen County's United Way/Madeline Housing Partners, LLC

Bergen County's United Way (BCUW)/Madeline Housing Partners, LLC, an experienced provider and manager of supportive and special needs housing, is partnering with the Township to provide group home facilities on Township-owned property (Block 22, Lot 66). The Township has executed an agreement with BCUW/Madeline confirming the provider's commitment to provide affordable units in the form of group homes for a minimum total of 43 affordable units, of which 20 units will be affordable age-restricted rental units and 13 units will be affordable supportive and special needs units containing 23 bedrooms. BCUW/Madeline Housing Partners, LLC will place a 50-year deed restriction on all 43 units. At least six units will be affordable to very low-income households, at least 16 units will be affordable to low-income households, and 21 units may be affordable to moderate-income households. The Township is eligible for 43 credits and 23 special needs rental bonus credits for a total of 66 credits towards its Third Round obligation.

The Township has already adopted a Bond Ordinance #12-2017 to fund \$462,500 towards this project for the construction of the units. Based on unanticipated costs related to site preparation, BCUW has requested an additional \$100,000, which the Township has included in its Fourth Round Spending Plan.

Community Options

The Township has entered into an agreement with Community Options to provide funding up to \$160,000 for a four-bedroom supportive and special needs home. The Township has already funded the project through Bond Ordinance #10-2018. In 2020, Community Options purchased the property at 537 Old York Road (Block 95.01, lot 3) and has renovated it into a group home for low- and moderate-income-qualified individuals with developmental disabilities. The group home will have 50-year affordability controls, and the deed restriction is in the process of being executed and recorded. Community Options has agreed to a subsidy of \$30,000 per bedroom, or \$120,000 total for this project.



Allies, Inc. – removed

The Township had entered into an agreement with Allies, Inc. to provide an additional 17 group home bedrooms that will all be deed restricted as very-low income units for at least 30 years. The Township intended to dedicate up to \$595,000 from the Affordable Housing Trust Fund for the purchase and renovation of 17 supportive and special needs bedrooms. Because of changes in the local real estate market as a result of the COVID-19 pandemic, Allies has indicated it is no longer able to provide these bedrooms, and so this compliance mechanism is being removed from the Township's Third Round compliance plan, and the 10 associated rental bonuses are being reassigned to the Apartments at Three Bridges project. The Township will replace the 17 units with additional units being generated during the Fourth Round.

MARKET TO AFFORDABLE

In 2018, the Township adopted a bond ordinance (Ordinance # 10-2018) for \$800,000 to be used towards the Township's market to affordable programs and group homes, and in 2020 it adopted another ordinance (Ordinance # 31-2020) to supplement those funds. As noted above, the Township has committed up to \$160,000 from these bonds towards a Community Option group home. The remaining funds will be utilized for the Township's market-to-affordable programs. The Township will bond for any shortfall in funding for this program.

Township-Wide Program

Readington proposes to address 25 units of its Third Round obligation through a Township-wide Market-to-Affordable program, to be administered by the Township in accordance with COAH's regulations. The Township intends to purchase 25 existing housing units in the Township at market prices which, in turn, will be rented or sold to income-eligible households at a low- or moderate-income rent or price. To date, the following seven units have been purchased and re-sold to income-eligible purchasers:

- 46 Junco Court, Three Bridges (Block 95, lot 12.046, two-bedroom, moderate-income)
- 137 Mockingbird Court, Three Bridges (Block 95, lot 12.137, three-bedroom, moderate-income)
- 235 Nuthatch Court, Three Bridges (Block 95, lot 12.235, one-bedroom, moderate-income)
- 6 Owl Court, Three Bridges (Block 95, lot 12.006, two-bedroom, moderate-income)
- 19 Owl Court, Three Bridges (Block, 95, lot 12.019, one-bedroom, moderate-income)
- 306 Sparrow Court, Three Bridges (Block 95, lot 12.306, one-bedroom, moderate-income)
- 325 Sparrow. Court, Three Bridges (Block 95, lot 12.325, three-bedroom, moderate-income)

The effect of the COVID-19 pandemic on suburban real estate prices has made it difficult for the Township to acquire additional units at appropriate prices, so the decision has been made not to continue with this program. The Township will make up the shortfall with additional units in the Fourth Round.

Harriet's Mobile Home Park

Readington Township proposed to address the remaining 22 units of its Market-to-Affordable Third Round obligation through an executed Memorandum of Understanding, dated June 27, 2018, with the



owner of Harriet's Mobile Home Park. The owner of Harriet's has agreed in principle to deed-restrict between 22 and 24 mobile home pad sites and future units for moderate-income households for at least 50 years. Harriet's Mobile Home Park is located at 3605 Route 22 (Block 38.01, Lots 85 and 86) and contain between 22 and 24 market-rate mobile home units. The Township has agreed to fund the extension of public sewer service to the property in exchange for the affordability controls that will be placed on between 22 and 24 mobile home pad sites and future units installed, purchased or rented, including five low-income and 17 moderate-income affordable family units. The Township has already approved a bond ordinance to fund this project in the amount of \$350,000, and the Water Quality Master Plan amendment was approved in January 2024. In December 2024, the Township awarded a contract to CMS Construction, Inc. to construct the wastewater system improvements necessary to connect all the units to the RLSA wastewater treatment plant. This work includes the construction of a force-main line, an on-site gravity main line, a pump station and the abandonment of the existing on-site subsurface septic disposal systems. Construction is scheduled to start in July 2025. Pursuant to the contract, all work must be completed by the close of 2025.

The site is located in Planning Area 2, which is a preferred location for affordable housing. There are no wetlands, Category 1 streams, steep slopes, flood hazard areas, contaminated sites or historic structures listed on the State or Natural Historic Registers on the site.

MUNICIPALLY SPONSORED

Willows at Whitehouse Station

Please see the discussion of this project under Satisfaction of the Prior Round Obligation. The Township is claiming the remaining 42 units not contributing to the Prior Round, along with associated rental bonuses, as credits toward its Third Round obligation,

Habitat for Humanity – James Street

The Township's original agreement with Habitat for Humanity was for the construction of a duplex (two units) and rehabilitation of an existing historic home (one unit) on a Township-owned parcel (Block 21.12, Lot 25) on James Street in Whitehouse Station. The Township has donated the land to Habitat for Humanity, which will now construct the two new affordable family for-sale units, but will not rehabilitate the existing structure. The subdivision has been perfected and Habitat has taken title to the lot, and anticipates submitting a Planning Board application in 2025. The third unit that was to have been created via that rehabilitation will now be provided as part of the Plaza 22/SAVE redevelopment (see below).

Dobozynski Farm Apartment

The Township purchased the Dobozynski Farm with a grant and loan from the New Jersey Green Acres program in April 1995. The farm contained three vacant apartments which were included in the Township's 1996 Housing Element as affordable rental units. Due to restrictions from the Department of Environmental Protection pertaining to re-use of Green Acres property, the Township is only able to rent one unit (a two-bedroom unit) as affordable housing.



The Township, utilizing funding from the Affordable Housing Trust Fund, made improvements to the two-bedroom unit and recorded a 30-year deed restriction in 1996. It is administered by the Township's Affordable Housing Office.

Apartments at Three Bridges

Readington Township is addressing a portion of its Third Round obligation through a municipally sponsored 100% affordable development of 80 affordable family rental units, including five unit set aside for disabled veterans, on Block 81, Lot 1, off of Route 202 in Three Bridges. The site was described as "non-deferred" in the Township's 2018 Settlement Agreement with FSHC even though there was no sewer capacity for the project. The Township spent a tremendous amount of time and money to cure I&I and mediate with the regional sewerage authority. At the end of that process, the Township was able to amend its agreement with the RLSA and secure sewer for the project. In addition to those efforts, the Township spent a lot of time working with the state DEP to get the project into the SSA. The Township also donated the land and committed to bond for shortfalls. In short, the project required herculean effort and expense by the Township and it resulted in a fully approved site plan. The project has now secured 4% tax credit funding and funding from the state ASPIRE program.

INCLUSIONARY SITES

Camelot at Readington

Camelot at Readington, the former SAR site, comprises 44 acres across three lots (Block 36, Lots 5, 5.02, and 5.04). Kaplan, the developer, received preliminary approval in November 2024 for 192 family rental units, of which 48 family affordable units will be deed restricted for low- and moderate-income households, including seven very low-income family affordable units.

The affordable units will be developed and occupied in accordance with UHAC rules, N.J.A.C. 5:80-26.1 et seq., including but not limited to bedroom distribution and affordability controls of at least 30 years, with the exception of the very-low income requirement such that 13% of the units will be reserved for households at 30% of the regional median income instead of the UHAC requirement of 10% of the units reserved for households at 35% of the regional median income. Additionally, the affordable units will comply with N.J.A.C. 5:97-3.14, accessible and adaptable affordable units. The units will be administered by the Township affordable housing administrator.

This project will contribute 96 credits, (48 very low-, low- and moderate-income family rental units and 48 rental bonus credits) toward the Township's Third Round obligation and will also be used to meet the family obligation and the rental obligation, including the family rental obligation and seven very low-income units.

The Ridge at Readington

The Ridge at Readington, formerly called Readington Commons, site is 17.12 acres across Block 4, Lots 51 and 52. The project, which is completed and which received its certificates of occupancy in 2023, includes 64 family affordable units. The project will contribute 128 credits (nine very low-, 23 low-, and 32 moderate-income family rental units and 64 rental bonus credits) toward the Township's Third



Round obligation and will also be used to meet the family obligation and the rental obligation, including the family rental obligation and nine very low-income units.

Fox Hollow

The Fox Hollow site is 101 acres and consists of one lot (Block 15, Lot 28). The proposal to develop the site includes 240 senior rental units, of which 48 units will be deed-restricted for low- and moderate-income households including seven very low-income units.

The site is adjacent to Block 5.11, Lot 2 which is located in Branchburg Township. The combined parcels make up the Fox Hollow Golf Club, which currently contains an 18-hole golf course, clubhouse and other maintenance buildings. The proposed development will be situated on the eastern half of Block 15, Lot 28 and portions of the golf course will remain but in a different configuration.

The site is bounded by a single-family detached dwellings and the golf course to the north and east, multi-family uses to the south along Route 22 and vacant wooded preserved land to the west. The Lamington River is situated on the northeastern property line with tributaries to the river running along the northern and eastern property line. State open waters (ponds) are situated along the eastern property boundary as well. Although the site has minimal frontage on Route 22 (less than 10 feet), the proposed development will gain access from an access drive proposed for an approved townhouse development in Branchburg Township located immediately south of the site on the adjacent parcel.

The parcel is currently zoned Agricultural Residential (AR). Revised zoning for the site will be created to permit the inclusionary zoning. Public sanitary sewer and water will be provided through Branchburg Township by the Somerset-Raritan Valley Sewerage Authority ("SRVSA") pursuant to a stipulation of settlement between Branchburg Township and Fox Hollow Enterprises, Inc., dated April 21, 1980.

The affordable units will be developed and occupied in accordance with UHAC rules, N.J.A.C. 5:80-26.1 et seq., including but not limited to bedroom distribution and affordability controls of at least 30 years, with the exception of the very low-income requirement that 13% of the units will be reserved for households at 30% of the regional median income instead of the UHAC requirement of 10% of the units reserved for households at 35% of the regional median income. The affordable units will comply with N.J.A.C. 5:97-3.14, accessible and adaptable affordable units. The units will be administered by the Township affordable housing administrator.

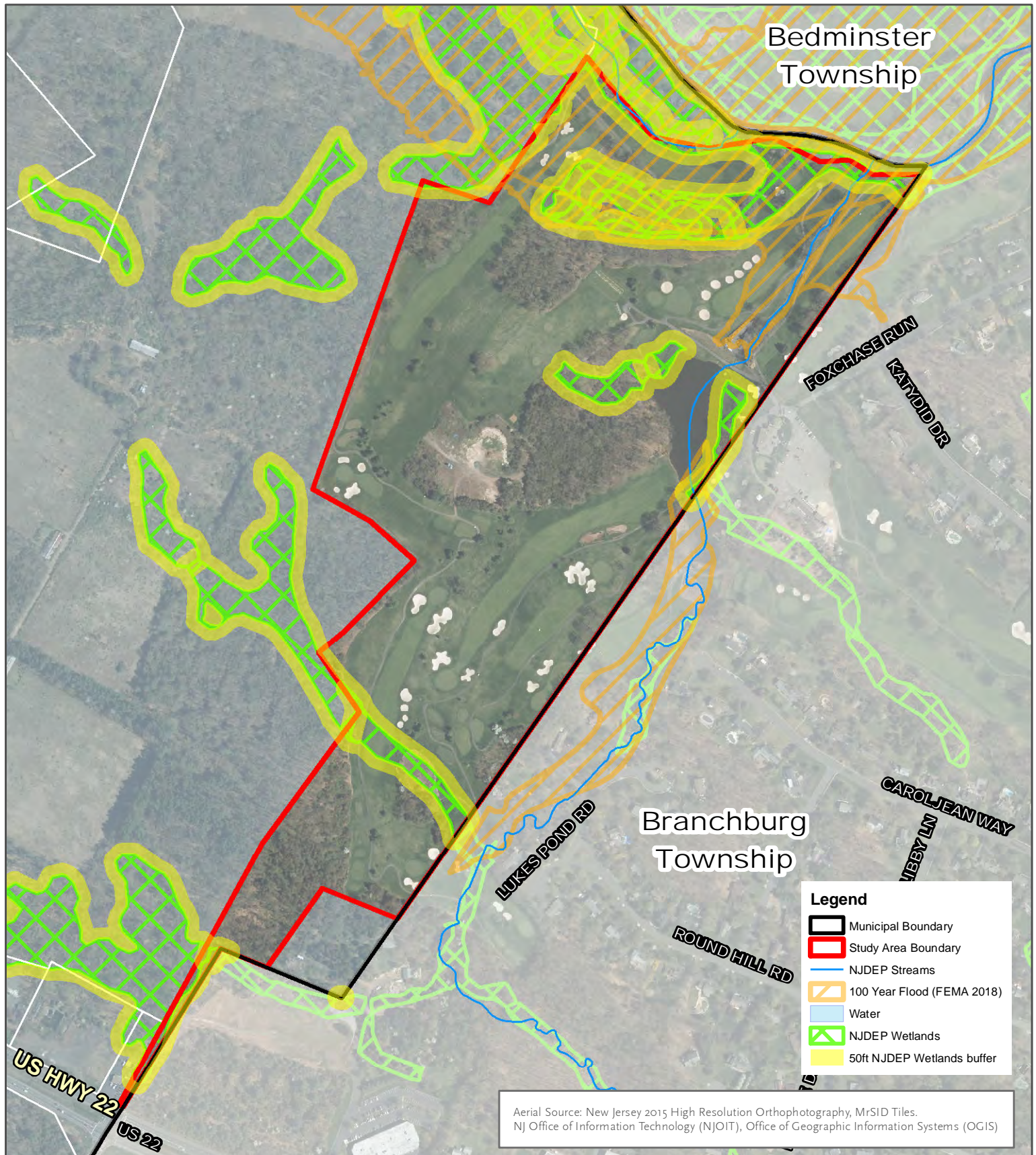
As stated in N.J.A.C. 5:93-5, affordable housing sites shall be available, approvable, developable, and suitable, as defined in N.J.A.C. 5:93-1.3, for the production of low- and moderate-income housing. As stated below, the Fox Hollow site meets these criteria:

- ✓ Site Control – The developer has represented that the site has clear title and no legal encumbrances which would preclude its development for inclusionary affordable family rental housing.



- ✓ Suitable Site– The site is suitable as defined in COAH’s regulations at N.J.A.C. 5:93-1.3 which indicates that a suitable site is one in which it is adjacent to compatible uses, has access to appropriate streets and is consistent with environmental policies in N.J.A.C. 5:93-4.
 - *The site is adjacent to compatible land uses and has access to appropriate streets.* Although the site has minimal frontage on Route 22 (less than 10 feet), the proposed development will gain access from an existing driveway accessing Route 22 proposed for an approved townhouse development in Branchburg Township located immediately south of the site on the adjacent parcel. An access easement agreement will be executed. As indicated the site is adjacent to single family residences, commercial uses and vacant wooded parcels.
 - *The site can be developed in accordance with R.S.I.S.* Development of the site will be consistent with the Residential Site Improvement Standards, N.J.A.C. 5:21-1 et seq.
 - *The site is located in a “Smart Growth Planning Area.”* The 2001 Adopted State Plan Map and the 2004 Preliminary State Plan Map designates the property as the Suburban Planning Area (PA 2), the preferred location for affordable housing development. The intention of the Suburban Planning Area is to provide for much of the State’s future development in a compact form.
 - *The development is not within the jurisdiction of a Regional Planning Agency or CAFRA.* The site is located outside of the Pinelands, CAFRA, Highlands, or Meadowlands.
 - *The site will comply with all applicable environmental regulations.* Although there are wetlands, Category 1 streams (Lamington River and Fox Hollow), floodplains and riparian zones on the property as shown on the aerial map, these environmental constraints will not preclude the proposed affordable housing development on the property as shown on the aerial map. There are no contaminated sites located on the property or immediate vicinity.
 - *The site will not impact any historic or architecturally important sites and districts.* There are no historic or architecturally important sites or buildings on the property or in the immediate vicinity that will impact the development of the proposed affordable housing.
- ✓ Developable Site – In accordance with N.J.A.C. 5:93-1.3, a developable site has access to appropriate sewer and water infrastructure and is consistent with the areawide water quality management plan. Public sanitary sewer and water will be provided through Branchburg Township by the Somerset-Raritan Valley Sewerage Authority (“SRVSA”) pursuant to a stipulation of settlement between Branchburg Township and Fox Hollow Enterprises, Inc. dated April 21, 1980. Pursuant to the Settlement Agreement, the Township will support an application to amend the sewer service area for this site.
- ✓ Approvable Site – Pursuant to N.J.A.C. 5:93-1.3, an approvable site 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. The parcel has been rezoned to permit the inclusionary development.

✓



0 250 500 Feet

Clarke Caton Hintz



Architecture

Planning

Landscape Architecture

HOUSING ELEMENT AND FAIR SHARE PLAN

Fox Hollow

Block 15 Lot 28

LOCATION:

Readington Township, Hunterdon County, NJ

DATE:

March 2020