

# **Master Plan Housing Element and Fair Share Plan**

**Township of Clark**  
Union County, New Jersey

May 22, 2025  
Adopted on June 5, 2025

Prepared by:

**ricci**planning

177 Monmouth Avenue  
Atlantic Highlands, NJ 07716



Paul N. Ricci, AICP, PP  
New Jersey Professional Planner  
License No.: LI005570

*The original of this document was signed  
and sealed in accordance with New Jersey Law*

**TABLE OF CONTENTS**

I. INTRODUCTION.....	2
II. HOUSING ELEMENT .....	5
A. ANALYSIS OF DEMOGRAPHIC, HOUSING AND EMPLOYMENT CHARACTERISTICS .....	5
1. <i>Housing Stock Inventory</i> .....	5
2. <i>General Population Characteristics</i> .....	8
3. <i>Household Characteristics</i> .....	10
4. <i>Income Characteristics</i> .....	10
5. <i>Resident Employment Characteristics</i> .....	11
6. <i>Employment within Clark</i> .....	12
III. FAIR SHARE PLAN.....	13
A. INTRODUCTION.....	13
B. REHABILITATION OBLIGATION .....	13
C. ROUND 1, 2 AND 3 OBLIGATION .....	13
1. <i>Round 1, 2 and 3 Compliance</i> .....	14
2. <i>Summary of Round 1, 2 and 3 Compliance</i> .....	17
3. <i>Monitoring</i> .....	18
D. FOURTH ROUND OBLIGATION .....	18
E. THE 25 PERCENT REQUIREMENT.....	24
F. RESERVATION OF RIGHT AND AUTHORITY .....	24

**Appendices**

Appendix A – Project Monitoring Sheets

Appendix B – Vacant Land Adjustment

Appendix C – Proposed Affordable Housing Sites Mapping and Table

Appendix D – Proposed Overlay Ordinances

Appendix E – Spending Plan

Appendix F – Township Affordable Housing Ordinances

Appendix G – Township Development Fee Ordinance

**Township of Clark**  
**2025 Housing Element and Fair Share Plan**

## **I. INTRODUCTION**

This Housing Element and Fair Share Plan has been prepared on behalf of the Township of Clark, Union County, in accordance with the New Jersey Municipal Land Use Law (N.J.S.A. 40:55D-1 et seq.) and the New Jersey Fair Housing Act (N.J.S.A. 52:27D-301 et seq. as amended through P.L. 2024, c. 2 and hereinafter referred to as “FHA II”). This document supersedes and replaces the Township’s 2017 Housing Element and Fair Share Housing Plan.

The Municipal Land Use Law requires that a municipality’s master plan include a Housing Element for it to exercise the power to zone and regulate land use.

FHA II established a new process whereby a municipality could secure approval of its Housing Element and Fair Share Plan. FHA II requires any municipality that wished to participate in the new process to adopt a resolution committing to fair share obligations by January 31, 2025, and to file a declaratory relief action within 48 hours of adopting this resolution. By adopting this resolution and filing this declaratory judgment action, FHA II provides that the municipality is immune from exclusionary zoning lawsuits. FHA II further provides that if a municipality wishes to extend immunity, it must adopt a Housing Element and Fair Share Plan by June 30, 2025 and file the duly adopted Housing Element and Fair Share Plan with the Dispute Resolution Program created by FHA II.

The Township has determined that it is in the best interest of the community to participate in the procedures established by FHA II.

Accordingly, the Township adopted a resolution committing to certain fair share numbers by January 31, 2025 and filed a declaratory relief action within 48 hours of its adoption. In a further effort to follow the procedures created by FHA II, the Township directed Paul Ricci, AICP, PP to prepare a Housing Element and Fair Share Plan for consideration by the Planning Board and Governing Body. Accordingly, Paul Ricci, AICP, PP prepared this Housing Element and Fair Share Plan. If the Planning Board adopts, this plan will be filed with the Dispute Regulation Program within 48 hours.

FHA II specifies that all parties may continue to rely on regulations previously adopted by the agency until new rules and regulations are adopted. A municipality’s affordable housing obligation consists of its rehab obligation, also known as its Present Need and its new construction obligation. The new construction obligations consist of the Township’s prospective need obligation for Round 1 through the Round 4.

As to the rehab obligation, the obligation is 71 units.

**Township of Clark**  
**2025 Housing Element and Fair Share Plan**

As to the new construction obligation, the total obligation is 429 units. This consists of a prior round obligation of 93 units for Rounds 1 and 2, a Round 3 obligation of 170 units, and a Round 4 obligation of 166 units. A municipality with insufficient vacant land may request a vacant land adjustment of its new construction obligation, pursuant to N.J.S.A. 52:27D-310.1. The Township of Clark is requesting such an adjustment and has determined that its Realistic Development Potential (RDP) is zero (0) units, thereby resulting in an unmet need of 166 units. This is Clark's Round 4 obligation after adjusting for the amount of vacant land in the municipality.

This Housing Element and Fair Share Plan constitutes an amendment of the Clark Township Master Plan and explains how it proposes to address its obligations. N.J.S.A. 52:27D-310 sets forth the required contents of a Housing Element as follows:

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

**Township of Clark  
2025 Housing Element and Fair Share Plan**

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

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

**Township of Clark**  
**2025 Housing Element and Fair Share Plan**

## II. HOUSING ELEMENT

### A. Analysis of Demographic, Housing and Employment Characteristics

As required by N.J.S.A. 52:27D-310, all housing elements must contain a discussion of the community's demographic, housing, and economic characteristics. In fulfillment of this requirement, the following subsections profile the Township of Clark with information obtained from the United States Census Bureau and the New Jersey Department of Labor and Workforce Development.

#### 1. Housing Stock Inventory

According to the most recent data of the United States Census Bureau, there are 6,084 housing units in the Township of Clark, of which 135 or 2.2 percent are vacant. Of the 5,949 occupied housing units, 4,527 are owner-occupied and the remaining 1,422 units are renter-occupied. See Table 1, Housing Tenure by Number of Units in Structure, 2023 for a detailed explanation of the housing units identified in the United States Census Bureau's 5-Year American Community Survey.

**Table 1: Housing Tenure by Number of Units in Structure, 2023**

<i>Unit Type</i>	<i>Owner-Occupied Units</i>	<i>Percent of Total Occupied Units</i>	<i>Renter-Occupied Units</i>	<i>Percent of Total Occupied Units</i>	<i>Total Occupied Units</i>	<i>Percent of Total Occupied Units</i>
1 unit, detached	4,230	93.4	255	17.9	4,485	75.4
1 unit, attached	172	3.8	31	2.2	203	3.4
2 units	34	0.8	201	14.1	235	4.0
3 or 4 units	9	0.2	108	7.6	117	2.0
5 to 9 units	53	1.2	50	3.5	103	1.7
10 to 19 units	0	0.0	108	7.6	108	1.8
20 or more units	29	0.6	669	47.0	698	11.7
Mobile home	0	0.0	0	0.0	0	0.0
Boat, RV, van, etc.	0	0.0	0	0.0	0	0.0
<b>Total Units</b>	<b>4,527</b>	<b>100.0</b>	<b>1,422</b>	<b>100.0</b>	<b>5,949</b>	<b>100.0</b>

**Note:** Percentage totals may not sum to 100 percent due to rounding

**Source:** United States Census Bureau, 2023 Five-Year American Community Survey

As can also be seen in Table 1, the Township of Clark has a mix of housing types. Although 4,688 occupied housing units, or approximately 78.8 percent of all occupied housing units, are single-family units, including 4,485 single-family detached and 203 single-family attached units, a total of 1,261 occupied housing units, or about 21.2 percent of all occupied housing units, are in structures that contain at least two housing units. Moreover, more than half (55.4 percent) of

**Township of Clark**  
**2025 Housing Element and Fair Share Plan**

the housing units that are in structures that contain at least two housing units are in structures that contain 20 or more units.

Table 2, Housing Units by Age of Structure, 2023, indicates the age of the Township's housing stock. More than half (56.3 percent) of Clark's existing housing units were constructed between 1950 and 1969, which reflects the trend towards suburbanization in the New York/New Jersey/Connecticut metropolitan area during this period. The Township's housing stock is aging, with the median year built of all housing units being 1962; owner-occupied housing units being 1961; and renter-occupied housing units being 1966.

**Table 2: Housing Units by Age of Structure, 2023**

<i><b>Year Built</b></i>	<i><b>Total Units</b></i>	<i><b>Percent of Total Units</b></i>	<i><b>Owner-Occupied Units</b></i>	<i><b>Percent of Owner-Occupied Units</b></i>	<i><b>Renter-Occupied Units</b></i>	<i><b>Percent of Renter-Occupied Units</b></i>
2020 or later	50	0.8	50	1.1	0	0.0
2010 to 2019	326	5.4	90	2.0	211	14.8
2000 to 2009	294	4.8	130	2.9	137	9.6
1990 to 1999	171	2.8	120	2.7	51	3.6
1980 to 1989	234	3.8	194	4.3	23	1.6
1970 to 1979	769	12.6	569	12.6	177	12.4
1960 to 1969	1,563	25.7	1,252	27.7	268	18.8
1950 to 1959	1,861	30.6	1,602	35.4	259	18.2
1940 to 1949	633	10.4	387	8.5	246	17.3
1939 or earlier	183	3.0	133	2.9	50	3.5
<b>Totals</b>	<b>6,084</b>	<b>100.0</b>	<b>4,527</b>	<b>100.0</b>	<b>1,422</b>	<b>100.0</b>
<b>Median Year Built</b>	<b>1962</b>	<b>N/A</b>	<b>1961</b>	<b>N/A</b>	<b>1966</b>	<b>N/A</b>

**Note:** Percentage totals may not sum to 100 percent due to rounding

**Source:** United States Census Bureau, 2023 Five-Year American Community Survey

Table 3, Housing Units by Number of Rooms, 2023, shows that 70.5 percent of the Township's housing stock contains six or more rooms, with all housing units containing a median of 6.8 rooms. When considering just owner-occupied units, however, it is noted that they contain a median of 7.3 rooms, with 88.3 percent of them containing six or more rooms. On the other hand, the Township's renter-occupied units contain a median of 3.8 rooms with just 17.4 percent of them containing six or more rooms.

**Township of Clark**  
**2025 Housing Element and Fair Share Plan**

**Table 3: Housing Units by Number of Rooms, 2023**

<i><b>Rooms</b></i>	<i><b>Total Units</b></i>	<i><b>Percent of Total Units</b></i>	<i><b>Owner- Occupied Units</b></i>	<i><b>Percent of Owner- Occupied Units</b></i>	<i><b>Renter- Occupied Units</b></i>	<i><b>Percent of Renter- Occupied Units</b></i>
1 room	36	0.6	0	0.0	36	2.5
2 rooms	60	1.0	0	0.0	60	4.2
3 rooms	644	10.6	49	1.1	522	36.7
4 rooms	504	8.3	161	3.6	326	22.9
5 rooms	550	9.0	319	7.0	231	16.2
6 rooms	863	14.2	748	16.5	105	7.4
7 rooms	1,241	20.4	1,185	26.2	56	3.9
8 rooms	1,280	21.0	1,226	27.1	54	3.8
9 or more rooms	906	14.9	839	18.5	32	2.3
<b>Total</b>	<b>6,084</b>	<b>100.0</b>	<b>4,527</b>	<b>100.0</b>	<b>1,422</b>	<b>100.0</b>
<b>Median Rooms</b>	<b>6.8</b>	<b>N/A</b>	<b>7.3</b>	<b>N/A</b>	<b>3.8</b>	<b>N/A</b>

**Note:** Percentage totals may not sum to 100 percent due to rounding

**Source:** United States Census Bureau, 2023 Five-Year American Community Survey

Table 4, Value of Owner-Occupied Housing Units, 2023, provides a detailed description of housing values within the Township of Clark. Indeed, it shows that most (60.4 percent) of the owner-occupied housing units in the Township have a value of between \$500,000 and \$999,999, with the median value of owner-occupied housing units being \$570,000.

**Table 4: Value of Owner-Occupied Housing Units, 2023**

<i><b>Home Value</b></i>	<i><b>Number</b></i>	<i><b>Percent</b></i>
\$199,999 or less	73	1.6
\$200,000 to \$299,999	114	2.5
\$300,000 to \$499,999	1,478	32.6
\$500,000 to \$999,999	2,734	60.4
\$1,000,000 or more	128	2.8
<b>Total</b>	<b>4,527</b>	<b>100.0</b>
<b>Median Value</b>	<b>\$570,400</b>	<b>N/A</b>

**Note:** Percentage totals may not sum to 100 percent due to rounding

**Source:** United States Census Bureau, 2023 Five-Year American Community Survey

Table 5, Gross Rent of Renter-Occupied Units, 2023, details gross rents within Clark. As shown in Table 5, a cash rent is paid in all except 78, or 5.5 percent, of Clark's 1,422 renter-occupied housing units. When a cash rent is paid, the gross rent of most (80.1 percent) renter-occupied housing units with a cash rent ranges from \$1,500 to \$2,999 per month.