



# *The Township of Moorestown*

Department of Community Development  
111 West Second St. • Moorestown • New Jersey 08057  
(856)235-0912

## 2025 LOW- AND MODERATE HOUSING OVERSIGHT COMMITTEE MEETING MINUTES

**Meeting:** Wednesday, May 28, 2025 at 7:00pm at Donut Room

**Next Meeting:** June 25, 2025

### **I**      **Call to Order: Roll Call:** (Present “Y”; Not Present “N”)

Y \* Chairperson    Phil Garwood  
Y \* Vice Chair     Victoria Britton, Esq.  
Y \* Secretary      Brooks Garrison, R.A.  
N \* Committee     Michael Connelly  
Y \* Committee     Nick Cangelosi  
Y \* Councilman    Christopher Keating, Esq.  
Y \* MT, DCD       Damian Gil

### **II**      **Open Public Meeting Act:**

“Notice of this meeting has been provided in accordance with the “Open Public Meetings Act” by:

1. Posting a notice on the bulletin board at the Library and Municipal Complex.
2. Emailing a notice to Burlington County Times and Philadelphia Inquirer.
3. Posting a copy of the Agenda on the Municipal Website.
4. Forwarding written notice to each person who has requested copies of the regular meeting schedule.

The above posting, filing, and mailing having taken place on or before 20<sup>th</sup> day of May 2025.

### **III**     **Minutes from March 26, 2025:**

1. Accepted.

### **IV**     **Old Business:**

1. Moorestown Township filed with the State on April 21<sup>st</sup> for a 3 month extension from June – September, 2025. This is pending a court decision. The State is still

dealing with a number of municipalities that are suing the State not accepting their required numbers. Moorestown did adept/agree with the State number.

2. Moorestown Township consultant Brian Slaugh, P.P. is preparing the Planning Document Draft Plan. It is due in June. This committee review will advise.
3. Attached is a draft document dated April 23, 2025 issued to Moorestown Township Council From: Low and Moderate Income Housing Oversight Committee (LMIHOC). Initial Site Recommendations and Compliance Strategies for Affordable Housing (2025 -2035 Planning Period). This was discussed, item by item in detail.
4. There was extensive conversation about several potential sites.
  - SRC -1 Open field behind Marne Hwy, YMCA, Virtua was added to the list of potential sites.
5. Vertical 20% set aside Mixed-Use sites were discussed along North Church Street and Camden Avenue. Mixed-Use Vertical (3) plus stories include: commercial 1<sup>st</sup> floor and Residential 2nd & 3<sup>rd</sup> floors with 20% set aside for low/moderate housing, The suggestion is to change zoning along these corridor roads allowing this development. Change zoning to overlay.
6. Accessory Dwelling Units (ADU's) were discussed at length and the committee decided there were too many liabilities and potential concerns. The committee will not recommend ADU's.

## **V New Business**

1. The committee received a copy of the, 'Public Hearing Draft, Housing Element and Fair Share Plan' email from Damian Gil provided by Brian M. Slaugh, PP, AICP of Clark Caton Hintz dated May 23, 2025. Key page copies of this emailed report were discussed and are attached. Page 45, "Satisfaction of the Fourth Round Obligation' determined a total of 4 units is required. The report recommends a 4 unit obligation will be satisfied with the Township extending controls (Deed restrictions) on MEND rental units that have expired controls.
2. This committee proposed and the report documents potential redevelopment via "Overlay Zoning" areas providing RDP (realistic development plan) for three sites. This is discussed on pages 46-49. They include Block 3900, Lots #19 and #21 part of Brandywine Moorestown Estates at the corner of N. Church Street and New Albony Road, Lot #20 adjacent, and Block 8801, Lot #4.01 / Comcast Business Center.

3. The committee members are requested to send comments or suggestions to Damian Gil as soon as possible on the “Draft” report. The Moorestown Township Planning Board meeting is Thursday June 5, 2025 at 7pm. At that meeting this report will be reviewed, discussed and possibly recommended for Township Council adoption / approval. The Council meeting is Monday June 16, 2025 at 7pm.
4. The next committee meeting is Wednesday June 25<sup>th</sup> at 7pm. The work of this committee will conclude with adoption of these minutes, pending approval of the Draft plan by Township Council.

**VI    Adjournment:**            Next Meeting: Wednesday June 25, 2025 at 7pm.

# **PUBLIC HEARING DRAFT Housing Element and Fair Share Plan**

Township of Moorestown  
Burlington County, New Jersey

May 23, 2025

Clarke Caton Hintz



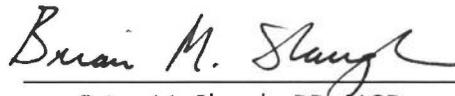
**PUBLIC HEARING DRAFT**

**Housing Element and Fair Share Plan**

Planning Board  
Township of Moorestown  
Burlington County, New Jersey

May 23, 2025

*Prepared By:*



Brian M. Slauch, PP, AICP  
New Jersey Professional Planner License 3743

With the Assistance of

Elaine Clisham, PP, AICP  
New Jersey Professional Planner License 6507

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

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



## **Moorestown Township Council**

**Quinton Law, Mayor**  
**Sue Mammarella, Deputy Mayor**  
**James Barry**  
**Nicole Gillespie**  
**Christopher Keating**

**Kevin Aberant, Esq., Township Manager**  
**Patricia L. Hunt, RMC, Township Clerk**  
**Douglas Heinold, Esq., Township Attorney**  
**Michael J. Edwards, Esq., Special Counsel**

## **Moorestown Township Planning Board**

**Robert Musgnug, Chair, Class IV**  
**William Wesolowski, Vice-Chair, Class IV**  
**Kevin Aberant, Esq., Township Manager, Class I**  
**Edgar “Rudy” Thomas, Class II**  
**Christopher Keating, Council Member, Class III**  
**Melissa Arcaro Burns, Class IV**  
**Joseph Maguire, Class IV**  
**Naoji Moriuchi, Class IV**  
**Lisa Petriello, Class IV**  
**D’Arcy DiSpirito, Alternate I**  
**Alfred Driscoll, Alternate II**  
**Patricia Muscella, Board Secretary**  
**Damian Gil, Alternate Board Secretary**  
**Laura Moore, Recording Secretary**  
**Danielle Gsell, Alternate Recording Secretary**  
**Matthew Wieliczko, Esq., Board Attorney**  
**Christopher Noll, PE, CME, Board Engineer**  
**Megan Stanley, PP, AICP, Board Planner**

## **Low and Moderate Income Housing Oversight Committee**

**Michael Connolly**  
**Philip Garwood**  
**Victoria Britton**  
**Nicholas Cangelosi**  
**Brooks Garrison**  
**Christopher Keating, Council Liaison**



# Table of Contents

|   |           |
|---|-----------|
| Housing Element and Fair Share Plan .....   | 1         |
| <b>Introduction</b> .....   | <b>1</b>  |
| <b>Brief History and Regional Location</b> .....                                    | <b>1</b>  |
| <b>NJ Affordable Housing Judicial and Legislative Background</b> .....              | <b>2</b>  |
| COAH’s First and Second Rounds (1987-1999) .....                                    | 3         |
| COAH’s Third Round and Related Judicial and Legislative Activity, (1999-2025) ..... | 3         |
| Third Round Judicial Activity .....   | 4         |
| Third Round Legislative Activity .....  | 5         |
| The Fourth Round (2025-2035) .....  | 5         |
| <b>Moorestown’s Affordable Housing History</b> .....                                | <b>6</b>  |
| 2015 Declaratory Judgment and Third Round Plan .....                                | 6         |
| 2024 Amended Fair Housing Act and Fourth Round Plan .....                           | 8         |
| <b>Affordability Requirements</b> .....   | <b>9</b>  |
| Table 1. 2025 Income Limits for Region 5 .....                                      | 9         |
| Table 2. Illustrative 2024 Affordable Gross Rent Prices for Region 5 .....          | 9         |
| Table 3. Illustrative 2024 Affordable Sales Prices for Region 5 .....               | 10        |
| <b>Housing Element and Fair Share Plan Requirements</b> .....                       | <b>10</b> |
| <b>Housing, Population and Employment Analysis</b> .....                            | <b>14</b> |
| Housing Characteristics .....   | 14        |
| Table 4. Housing Units by Number of Units in Structure and Tenure, 2023 .....       | 14        |
| Table 5. Housing Units by Year Built, 2023 .....                                    | 15        |
| Table 6. Number of Bedrooms per Housing Unit, 2023 .....                            | 15        |
| Table 7. Value of Owner-Occupied Housing Units, 2013 and 2023 .....                 | 16        |
| Table 8. Gross Rent by Housing Unit, 2023 .....                                     | 17        |
| Table 9. Housing Affordability, 2023 .....  | 18        |
| Table 10: Indicators of Housing Deficiency, 2023 .....                              | 18        |
| Population Characteristics .....  | 18        |
| Table 11. Population Growth, 2000 to 2020 .....                                     | 19        |
| Table 12. Age Distribution, 2013 and 2023 .....                                     | 19        |
| Household Characteristics .....   | 19        |

|   |           |
|---|-----------|
| Table 13. Household Size of Occupied Units, 2013-2023 .....               | 20        |
| Table 14. Household Composition, 2023 .....                               | 21        |
| Household Size vs. Unit Size.....   | 21        |
| Table 15. Unit Size vs. Household Size, 2023 .....                        | 21        |
| Income Characteristics .....  | 22        |
| Table 16. Household Income by Income Bracket, 2023 .....                  | 22        |
| Table 17. Poverty Rates among Individuals and Families, 2023.....         | 22        |
| Employment Characteristics.....   | 22        |
| Table 18. Covered Employment by Sector, 2022.....                         | 23        |
| Jobs-Housing Ratio .....  | 23        |
| Population and Housing Projections .....                                  | 24        |
| Table 19. Population and Employment Projections, 2020-2050.....           | 24        |
| Table 20. Housing Projections, 2025-2035.....                             | 25        |
| <b>Consideration of Land for Affordable Housing .....</b>                 | <b>25</b> |
| <b>Sewer Capacity .....</b>   | <b>26</b> |
| <b>Water Capacity.....</b>  | <b>26</b> |
| Consistency with Recommendations of Multigenerational Family Housing      |           |
| Continuity Commission.....  | 27        |
| <b>Fair Share Plan .....</b>  | <b>28</b> |
| <b>Introduction .....</b>   | <b>28</b> |
| AFFORDABLE HOUSING OBLIGATIONS.....                                       | 29        |
| Table 21. Moorestown Affordable Housing Obligations for the 4th & Earlier |           |
| Rounds.....   | 29        |
| Present Need Obligation .....   | 29        |
| Prior Round Obligation.....   | 30        |
| Third Round Prospective Obligation.....                                   | 30        |
| Fourth Round Prospective Obligation.....                                  | 30        |
| <b>Moorestown's Affordable Housing Plan .....</b>                         | <b>30</b> |
| Satisfaction of the Rehabilitation Obligation .....                       | 30        |
| Satisfaction of the Prior Round Obligation .....                          | 30        |
| Table 22. Moorestown Prior Round Formulas for Minimum Rental and Senior   |           |
| Units.....  | 31        |
| Table 23. Satisfaction of the Prior Round Obligation .....                | 32        |

|  |           |
|--|-----------|
| Special Needs .....  | 33        |
| Satisfaction of the Third Round Obligation .....                           | 35        |
| Third Round Vacant Land Analysis and Realistic Development Potential ..... | 35        |
| Formulas Applicable to the Third Round .....                               | 36        |
| Table 24. Formulas Applicable to the Third Round Obligation .....          | 36        |
| Satisfaction of the Third Round RDP .....                                  | 37        |
| Supportive & Special Needs Housing.....                                    | 39        |
| Third Round Extension of Expiring Controls.....                            | 39        |
| Municipally Sponsored 100% Affordable Housing .....                        | 41        |
| Inclusionary Developments .....  | 41        |
| Municipally Sponsored Construction of 100% Affordable Development.....     | 44        |
| <b>Mechanisms to Address Unmet Need .....</b>                              | <b>45</b> |
| <b>Satisfaction of the Fourth Round Obligation .....</b>                   | <b>45</b> |
| Updated Vacant Land Analysis and Realistic Development Potential.....      | 45        |
| Table 26. Formulas Applicable to the Fourth Round Obligation .....         | 46        |
| <b>Unmet Need Mechanisms .....</b>   | <b>51</b> |
| <b>Very Low-Income Units .....</b>   | <b>51</b> |
| Table 27. Very Low-Income Obligation .....                                 | 51        |
| Table 28. Satisfaction of the Very Low-Income Obligation .....             | 51        |
| <b>Affordable Housing Administration .....</b>                             | <b>52</b> |
| Administration of Affordable Units .....                                   | 52        |
| <b>Affordable Housing Trust Fund and Spending Plan.....</b>                | <b>55</b> |
| Affordable Housing Trust Fund.....   | 55        |
| Spending Plan.....   | 55        |
| <b>Cost Generation.....</b>  | <b>56</b> |
| Map 1. Affordable Housing Sites.....                                       | 58        |

## MECHANISMS TO ADDRESS UNMET NEED

COAH established in *N.J.A.C. 5:93-4.2(h)* sets forth the types zoning or other regulations that can be used to address Unmet Need, whether in the Third or Fourth Round:

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

Aside from the three sites already discussed for the Third Round, a mandatory overlay district was adopted as part of the housing plan that is found in Appendix G in 2019. Lastly, the Township first introduced a development fee ordinance in 1995 that was last amended in 2009 following approval by COAH (see Appendix G).

## SATISFACTION OF THE FOURTH ROUND OBLIGATION

### Updated Vacant Land Analysis and Realistic Development Potential

As part of the process of addressing its Fourth Round obligation of 250 units, the Township has again analyzed all vacant, developable land in the Township, including all land held by the municipality, using the Second Round rules at *N.J.A.C. 5:93-4.2*, Lack of Land, to determine whether any parcels in the Township have become vacant since the Third Round VLA was completed, and if so, whether any newly vacant parcels could be developed with inclusionary residential development sufficient to generate any affordable units. Of the land examined, one property has newly become vacant and is large enough to support inclusionary development.

This updated Vacant Land Analysis, which may be found in Appendix B, shows the tract totals 3.54 acres of developable vacant land. If it were to develop at a density of six units per acre, it could reasonably be expected to produce 21 total housing units. At a 20% affordable housing set-aside, this lot generates a Fourth Round RDP for the Township of four.

The Township will satisfy its Fourth Round RDP with three expiring controls on MEND rental units. Of the three extensions of controls at least two will be very low-income units. Because the MEND units are rental units, the Township is entitled to 0.5 bonuses per extension up to the maximum of 25% of the RDP, and so will apply bonuses to two extensions, for one bonus credit toward Fourth Round RDP compliance.

**Table 26. Formulas Applicable to the Fourth Round Obligation**

Minimum Rental Obligation N.J.A.C. 5:93-5.15(a) = 1 unit

.25 (RDP) = units

.25 (4) = 1 unit

Maximum Bonus = 1 bonus

.25(RDP) = bonuses

0.5 bonus for each extension of control =  $0.5 \times 2 = 1$  bonus

Minimum Family Rental Units = 1 unit

.50 (minimum rental obligation) =

.50 (1) = 0.5, rounded up to 1 unit

Maximum Senior Units N.J.A.C. 5:93-5.14(a)1 = 1 unit

.30 (total units) = units

.30 (4) = 1.2 units, round down to 1 unit

Minimum Total Family Units = 3 units

.50 (RDP – rental bonuses) =

.50 (4-1) = .50(3) = 1.5 units, round up to 2 units

The Township meets these requirements with two family rental extensions of controls, thus satisfying the rental, family rental, and family formula requirements. The Township is claiming no senior units toward its Fourth Round RDP, and thus meets that requirement as well.

### ***Extensions of Controls***

The Township will enter into an agreement with MEND to identify three very low-income family rental units whose controls are due to expire during the Fourth Round. Pursuant to the amended FHA, the Township and MEND will execute an agreement for extensions of controls on these, and perhaps other, affordable units whose controls are due to expire, in return for at least \$30,000 (the cost of the extensions paid per unit in the Third Round) payment to MEND from the Township's affordable housing trust fund. Because these are extensions of controls on rental units, the amended FHA permits the Township to claim 0.5 bonuses per unit up to a maximum of 25% of the Township's RDP, or one bonus credit. The agreement is anticipated to be similar to the agreement signed between MEND and Township in November 2017 and approved as part of the 2019 Housing Element and Fair Share Plan by the Court and in subsequent amendments to the HEFSP.

### **Redevelopment**

P.L. 2024 c.2 requires that “[a]ny municipality that receives an adjustment of its prospective need obligations for the fourth round or subsequent rounds based on a lack of vacant land shall as part of the process of adopting and implementing its housing element and fair share plan identify sufficient parcels likely to redevelop during the current round of obligations to address at least 25 percent of the prospective need obligation that has been adjusted, and adopt realistic zoning that allows for such adjusted obligation, or demonstrate why the municipality is unable to do so.” In discussion with the Township's affordable housing counsel, the interpretation is

that this requires 25% of the RDP, which is one unit, to be provided through redevelopment. To meet this requirement, the Township has identified three sites, discussed below, that it believes are likely to redevelop within the next 10 years.

***Block 3900, Lots 19 and 21***

Lots 19 and 21, now merged into Lot 19, are part of Brandywine Moorestown Estates, an assisted-living facility at 1205 N. Church Street. As noted previously, there is a second site adjacent to this one at the corner of N. Church Street and New Albany Road on Block 3900, Lot 20 that only has access through this tract. Formerly a bank, it has been vacant for more than a decade. It would make for a logical redevelopment of the site to incorporate this additional land into the overall redevelopment of this site. Since the site is already developed with a senior residential use, the application of the AMF-5 zoning district to this property as an overlay district, minus the tract size requirement, would allow additional development to occur on its underdeveloped property. The AMF-5 district permits 16 units per acre (see Appendix F). The services include assisted living, considered a residential use, and long term respite, which is considered a medical use. Assisted living facilities are required to account for a minimum of 10% of their beds as Medicaid and are creditworthy as senior units. The AMF-5 district would also allow other types of residential uses to expand their offerings to tenants. Presently, the site has 122 beds/units.

As required in *N.J.A.C. 5:93-5.3*, affordable housing sites shall be 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 demonstrated below, this site meets these criteria.

- **Site Control** (availability). The lot is currently in private ownership. Neither the owner nor the Township is aware of any title defects or deed restrictions that preclude development of affordable housing.
- **Suitability**. The lot fronts onto North Church Street. Across North Church Street is open land, behind which are light manufacturing uses. Lot 19 is in the SRC-1 Specially Restricted Commercial district, and Lot 21 is in the BP-1 Business Park 1 district. The tract is in Planning Area 1, the Metropolitan Planning Area, of the State Development and Redevelopment Plan, a smart-growth planning area where infrastructure already exists and infill redevelopment, including affordable housing, is encouraged.
- **Adequate Sewer and Water** (developability). The site is located in a sewer service area and a public water franchise area. There are no known constraints to providing such services to the property. One of the Township's main water tanks is located less than 1,000 feet from the site.
- **Approvability**. Development of the site will be consistent with the Residential Site Improvement Standards, *N.J.A.C. 5:21-1 et seq.* The development is not within jurisdiction of a regional planning agency or CAFRA.
- The site will comply with all applicable environmental regulations. The site contains no wetlands, flood plains or steep slopes, and there is no known environmental contamination on the site.

- The development of the site will not affect any known historic or archaeological resources as indicated in the Historic Preservation Element of the Master Plan.

In addition to site suitability, the developer of the affordable housing project will be required to meet the applicable requirements of UHAC:

- Administrative Entity. The Township will require that the developer engage a qualified administrative agent who will administer and affirmatively market the units at the site, income qualify applicants, place minimum 30-year affordability controls on the units if they are for-sale and 40 years if they are for rent, and provide long term administration of the units in accordance with COAH's rules at *N.J.A.C. 5:93-1 et seq.* and UHAC per *N.J.A.C. 5:80-26.1*.
- Very Low-, Low- and Moderate-Income Distribution. At least half of the affordable units developed will be affordable to low-income households, with at least 13% affordable to very low-income households.
- Affirmative Marketing. The affordable units will be affirmatively marketed in accordance with COAH's rules at *N.J.A.C. 5:93-1 et seq.* and *N.J.A.C. 5:80-26.1 et seq.*
- Bedroom Distribution. The distribution of the number of bedrooms will follow UHAC regulations for senior units, as applicable.

### **Block 3900, Lot 20**

Lot 20, adjacent to Lot 19 discussed above, is a 1.65-acre long-vacant bank property at the corner of North Church Street and New Albany Road. As noted this site would also be included in the AMF-5 overlay zoning at 16 units per acre.

As required in *N.J.A.C. 5:93-5.3*, affordable housing sites shall be 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 demonstrated below, this site meets these criteria.

- Site Control (availability). The lot is currently in private ownership. Neither the owner nor the Township is aware of any title defects or deed restrictions that preclude development of affordable housing.
- Suitability. The lot is on the corner of North Church Street and New Albany Road. Across New Albany Road are single-family homes, and across North Church Street is open land, behind which are light manufacturing uses. Lot 20 is in the SRC-1 Specially Restricted Commercial district. Wrapped around the lot to the northeast and northwest is the Brandywine property. The lot is in Planning Area 1, the Metropolitan Planning Area, of the State Development and Redevelopment Plan, a smart-growth planning area where infrastructure already exists and infill redevelopment, including affordable housing, is encouraged.
- Adequate Sewer and Water (developability). The site is located in a sewer service area and a public water franchise area. There are no known constraints in the provision of public utilities to the site. Water and sanitary sewer are located in both street frontages.

- Approvability. Development of the site will be consistent with the Residential Site Improvement Standards, *N.J.A.C. 5:21-1 et seq.* The development is not within jurisdiction of a regional planning agency or CAFRA.
- The site will comply with all applicable environmental regulations. The site contains no wetlands, flood plains or steep slopes, and there is no known environmental contamination on the site.
- The development of the site will not affect any known historic or archaeological resources as indicated in the Historic Preservation Element of the Master Plan.

In addition to site suitability, the developer of the affordable housing project will be required to meet the applicable requirements of UHAC:

- Administrative Entity. The Township will require that the developer engage a qualified administrative agent who will administer and affirmatively market the units at the site, income qualify applicants, place minimum 30-year affordability controls on the units if they are for-sale and 40 years if they are for rent, and provide long term administration of the units in accordance with COAH's rules at *N.J.A.C. 5:93-1 et seq.* and UHAC per *N.J.A.C. 5:80-26.1*.
- Very Low-, Low- and Moderate-Income Distribution. At least half of the affordable units developed will be affordable to low-income households, with at least 13% affordable to very low-income households.
- Affirmative Marketing. The affordable units will be affirmatively marketed in accordance with COAH's rules at *N.J.A.C. 5:93-1 et seq.* and *N.J.A.C. 5:80-26.1 et seq.*
- Bedroom Distribution. The distribution of the number of bedrooms will follow UHAC regulations for senior units, if applicable.

#### ***Block 8801, Lot 4.01/Comcast Business Center***

This lot, at 650 Centerton Road, is the location of the Comcast Business Center, an office building of three stories. Lot 4.03, which sits behind this lot to the southeast, is the location of the CIS 100% affordable development discussed above, and adjacent to this lot to the southwest is the Parker's Bend retirement community. Across Centerton Road are a golf course and single-family homes. To the northeast is Parker's Creek. The Comcast building is the lone office property among residential and multi-family development. The lot is approximately 5.3 acres.

As required in *N.J.A.C. 5:93-5.3*, affordable housing sites shall be 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 demonstrated below, this site meets these criteria.

- Site Control (availability). The lot is currently owned by Comcast. Neither the owners nor the Township is aware of any title defects or deed restrictions that preclude development of affordable housing.

- Suitability. As noted above, this lot is surrounded by age-restricted multi-family development single-family homes, a golf course, and wetlands/floodplain. It is in the SRC-2 Specially Restricted Commercial district. The lot is in Planning Area 2, the Suburban Planning Area, of the State Development and Redevelopment Plan, a smart-growth planning area where infrastructure already exists and infill redevelopment, including affordable housing, is encouraged. The Township intends to adopt inclusionary overlay zoning for the lot, utilizing the AMF-6 zoning district that would permit multi-family residential development at a density of 12 units per acre, for a potential affordable unit yield of 12 units at a 20% set-aside. See Appendix F for this zoning district.
- Adequate Sewer and Water (developability). The lot is located in a sewer service area, and the front portion of the lot is within a public water franchise area.
- Approvability. Development of the site will be consistent with the Residential Site Improvement Standards, *N.J.A.C. 5:21-1 et seq.* The development is not within jurisdiction of a regional planning agency or CAFRA.
- The site will comply with all applicable environmental regulations. The site contains no wetlands, flood plains or steep slopes, and there is no known environmental contamination on the site.
- The development of the site will not affect any known historic or archaeological resources as indicated in the Historic Preservation Element of the Master Plan.

In addition to site suitability, the developer of the affordable housing project will be required to meet the applicable requirements of UHAC:

- Administrative Entity. The Township will require that the developer engage a qualified administrative agent who will administer and affirmatively market the units at the site, income qualify applicants, place minimum 30-year affordability controls on the units if they are for-sale and 40 years if they are for rent, and provide long term administration of the units in accordance with COAH's rules at *N.J.A.C. 5:93-1 et seq.* and UHAC per *N.J.A.C. 5:80-26.1*.
- Very Low-, Low- and Moderate-Income Distribution. At least half of the affordable units developed will be affordable to low-income households, with at least 13% affordable to very low-income households.
- Affirmative Marketing. The affordable units will be affirmatively marketed in accordance with COAH's rules at *N.J.A.C. 5:93-1 et seq.* and *N.J.A.C. 5:80-26.1 et seq.*
- Controls on Affordability. The affordable units will have minimum 30-year affordability controls if they are for sale, and minimum 40-year controls, if they are for rent.
- Bedroom Distribution. The distribution of the number of bedrooms will follow UHAC regulations.