

**TOWNSHIP OF EVESHAM,
BURLINGTON COUNTY, NEW JERSEY**

**Amended Housing Plan Element & Fair Share Plan
Third Round (1999 – 2025)**

Prior Round Compliance Granted November 1999

November 24, 2021

Prepared by:



**Consulting & Municipal
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The original document was appropriately signed and sealed in accordance with the Chapter 41 Title 13 of the State Board of Professional Planners.

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This Housing Element and Fair Share Plan was originally prepared by Leah Furey Bruder, PP, AICP in 2018 and 2020. This updated plan has been modified, but retains much of Ms. Bruder's work.

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INTRODUCTION

Location and Context

Evesham Township is a large community in southwestern Burlington County, located approximately 11 miles to the southeast of the City of Philadelphia. Evesham Township is bordered by the Camden County municipalities of Cherry Hill Township and Voorhees Township to the west, and Berlin Township and Waterford Township to the south; and the Burlington County municipalities of Medford Township to the east and Mount Laurel Township to the north. Evesham Township is the most populous municipality in Burlington County and contains a variety of housing types and neighborhoods. The majority of the Township’s developed lands and population are located in the Marlton section of the Township, which is located at the intersection of the two major highways that traverse Evesham, Route 70 and Route 73.

Evesham Township was established in 1688 and was incorporated in 1692. At that time Evesham included parts of present-day Mount Laurel, Medford, Lumberton, Hainesport, Shamong and Washington Townships. The Township was divided a number of times in the 1800s and reached its current geographic size in 1872. In the 1800s “Marlton” was the name given to the downtown area; which was the center of commerce and civic activity in Evesham until the post-World War II building boom resulted in the gradual development of more dispersed suburban housing developments and strip shopping centers.

Approximately 16.35 square miles (55%) of Evesham Township is within the designated Pinelands Management Area. The Pinelands National Reserve was created by Congress in 1978, encompassing 1.1 million acres covering all or parts of 56 municipalities. In 1979 the Pinelands Commission was established and the Pinelands Protection Act was enacted, which set the stage for the adoption of the Pinelands Comprehensive Management Plan (CMP) in 1981. Soon thereafter municipalities within the Pinelands Area were required to adopt Master Plan and land use regulations consistent with the CMP. Since the adoption of the CMP, the suburban development of Evesham that had begun in the 1950s and had exploded in the 1970s, has continued but has been largely channeled to the non-Pinelands areas of the Township. Mainly as a result of the Pinelands regulations and associated infrastructure planning, and the environmental constraints within the Pinelands area, Evesham Township has developed with a distinctly suburban/urban character in the northern and western portions of the Township, particularly along the Route 73 and Route 70 corridors, and with a more rural character in the southern and eastern portions of the Township.

At the time of the 2010 US Census, the population was 45,538. Recent 2020 Census counts indicate that the Township’s population has increased to 46,826, an increase of over 1,000 people. The last significant gain in population was between 2000 and 2006, when the population increased from 42,275 to an estimate of 46,277 before the Great Recession. The recession slowed housing construction and impacted demand for the type of housing that had been in demand and prevalent prior to the recession. Residential and commercial development and construction began to pick up noticeably in Evesham Township around 2012, as the economic recovery took hold. After a slight estimated decrease in population after the recession due to smaller households occupying existing units, development activity such as construction of new housing units to accommodate new households has returned and the population once again is slowly increasing.

Affordable Housing

In 1975 the New Jersey Supreme Court determined, in *So. Burlington Cty. NAACP v. Township of Mount Laurel* (“Mount Laurel I”) that every developing municipality in New Jersey had an affirmative obligation to provide a “realistic opportunity” for its fair share of low and moderate income housing. In 1983, frustrated with the lack of voluntary compliance, the Supreme Court sought to create an incentive for voluntary compliance in its “Mount Laurel II” decision. In this decision, the Court exposed municipalities that refused to comply voluntarily to the possibility of builder’s remedy relief. The Court also called for the state legislature to enact legislation that would save municipalities from the inefficiency of having the courts determine their affordable housing needs.

In 1985 the Legislature adopted the Fair Housing Act (N.J.S.A. 52:27D-301 et. seq.) (“FHA”). The FHA created the New Jersey Council on Affordable Housing (COAH) and charged COAH with the responsibility of adopting regulations by which municipalities could determine their fair share responsibilities and the means by which they could satisfy those responsibilities. The Legislature also sought to promote voluntary compliance and empowered municipalities to submit to COAH’s jurisdiction and voluntarily comply under the protections of the COAH process.

Pursuant to the FHA, COAH adopted regulations for the first housing cycle in 1986; which covered the years 1987 through 1993 (“First Round”) and for the second housing cycle in 1994; which covered the years 1993 through 1999 (“Second Round”). Under both the First and Second Rounds, COAH utilized what is commonly referred to as the “fair share” methodology. COAH utilized a different methodology, known as “growth share,” beginning with its efforts to prepare Third Round housing-need numbers.

COAH first adopted the Third Round rules in 2004; which were to cover the years 1999 through 2014. The “growth share” approach created a nexus between the production of affordable housing and future residential and non-residential development within a municipality, based on the principle that municipalities should provide affordable housing opportunities proportionate to their market rate residential growth, and that along with employment opportunities there should be proportionate opportunities for affordable housing. Each municipality was required to project the amount of residential and nonresidential growth that would occur during the period 2004 through 2014 and prepare a plan to provide proportionate affordable housing opportunities. The regulations were challenged and in January 2007, the New Jersey Appellate Division invalidated key aspects of COAH’s third round rules and ordered COAH to propose and adopt amendments to its rules to address the deficiencies it had identified.

COAH adopted new Third Round rules in May of 2008 and subsequently adopted amendments that became effective on October 20, 2008. Changes to the Fair Housing Act were also adopted in July of 2008 (P.L. 2008 c. 46 on July 17, 2008). The COAH rules and regulations adopted in 2008 were subsequently challenged, and in an October 2010 decision the Appellate Division invalidated the “Growth Share” methodology, and also indicated that COAH should adopt regulations pursuant to the “Fair Share” methodology utilized in the First and Second Rounds. The Supreme Court affirmed this decision in September 2013, invalidating the third iteration of the Third Round regulations and sustaining the invalidation of growth share, and directing COAH to adopt new regulations pursuant to the methodology utilized in the First and Second Rounds. In October of 2014 COAH was deadlocked and

failed to adopt their newly revised Third Round regulations. Fair Share Housing Center, who was a party in the earlier cases, responded by filing a motion in aid of litigants' rights with the New Jersey Supreme Court. On March 20, 2015, the Court ruled that COAH was effectively dysfunctional, and consequently returned jurisdiction of affordable housing issues back to the trial courts as it had been prior to the creation of COAH in 1986.

Since the 2015 Mt. Laurel IV decision, municipalities have turned to the courts to seek a declaratory judgement of their housing plans to determine whether they are meeting their constitutional affordable housing obligations, and to be granted immunity from any "builder's remedy" lawsuits. With no COAH functioning and providing guidance to municipalities to determine their municipal fair share of statewide and regional obligations, a number of independent groups produced their own reports to determine individual obligations across the state. In several court decisions in 2016 and 2018, judges in Middlesex and Mercer County developed a methodology following closely one proposed by Fair Share Housing Center to determine municipal obligations. In the 2018 decision by Judge Jacobson, it was further determined that the initial period of the Third Round which had not been addressed (1999 – 2015) known as the "gap period" is to be included in each municipality's fair share calculations.

Evesham's Compliance History

Evesham's cumulative First and Second Round ("Prior Rounds") obligation was 534 units. The Township petitioned the Superior Court for a Second Round Judgement of Compliance in 1998. It was determined that the Township had satisfied the Prior Rounds obligations and the Township received a Judgement of Compliance in November of 1999. The Township's Prior Round compliance is outlined in the Fair Share Plan.

The Township filed a Third Round Declaratory Judgment Complaint on February 22, 2005 to comply with the COAH's first set of Third Round rules at N.J.A.C. 5:94 and 5:95, enacted in 2004. The Township prepared a Third Round compliance plan in 2005 and the Special Master issued a report on April 11, 2006. However, before the Court could complete its review, the Appellate Division issued its January 25, 2007 decision invalidating COAH's Growth Share methodology. The Superior Court entered an Order on February 22, 2008 postponing the Township's deadline to submit a revised Third Round Plan until all appeals were resolved. The Planning Board adopted another Third Round compliance plan on January 21, 2010; and the Special Master issued a report on the plan September 21, 2010. On November 21, 2011, the Court entered an Order granting the Township immunity against any builders' remedy lawsuits, without a specific expiration date.

The Township filed a Declaratory Judgment action on February 26, 2014, and took steps to obtain Court approval for its Affordable Housing Trust Fund Spending Plan and authorization to spend its affordable housing trust funds in accordance with the applicable rules. The Township filed a motion with the Court for approval of its revised 2015 Spending Plan and received Court approval on September 21, 2015.

Following the Mount Laurel IV decision in March 2015, the Court transferred responsibility to review and approve housing elements and fair share plans from COAH to designated Mount Laurel trial judges.

In reliance upon immunity that had previously been granted, the Township did not file a Declaratory Judgment action within the timeframe provided by the Supreme Court (by July 8, 2015). During this time Evesham was actively pursuing a variety of affordable housing opportunities. On October 15, 2015, Fair Share Housing Center (FSHC) filed a Complaint, seeking to strip the Township of its immunity conditioned on its preparation of a Third Round Housing Element and Fair Share Plan and satisfaction of a Fair Share number calculated by FSHC’s planner, David Kinsey, PhD.

Evesham Township shares FSHC’s concern for the provision of affordable housing opportunities, but was not in agreement with the fair share number produced by FSHC, and the Township wished to pursue its affordable housing goals in a manner consistent with sound planning and the Township’s various planning objectives. During the time that the Township and FSHC negotiated the Third Round “number” the Township remained determined to meet the affordable housing goals in a way that was also responsive to other priorities and constraints. Since 2015 the Township has continued to pursue affordable housing opportunities via multiple avenues. In August of 2018, the Township reached a settlement agreement addressing both the “number” for the Township’s Third Round fair share obligation of low and moderate income housing, as well the mechanisms the Township will use to satisfy this obligation. The Fair Share Settlement and this Fair Share Plan are the culmination of those efforts.

The Township has prepared this Housing Plan Element and Fair Share Plan in accordance with all requirements of the Municipal Land Use Law, the Fair Housing Act, and in conformance with the terms and conditions of the August 2018 settlement agreement with Fair Share Housing Center.

This Housing Plan Element and Fair Share Plan is an update to the previous plan adopted in December of 2020.

HOUSING PLAN ELEMENT

According to the Municipal Land Use Law (MLUL) (40:55D-28.b(3)), a municipality is required to adopt a Housing Plan Element of the Master Plan, as well as a Fair Share Plan for addressing its low and moderate income housing obligations in accordance with the Fair Housing Act (FHA). Pursuant to the Fair Housing Act, Section 10 of P.L. 1985, c. 222 (C. 52:27D-310), a municipality's housing plan element shall be designed to achieve the goal of access to affordable housing to meet present and prospective housing needs, with attention to low- and moderate-income housing. This updated Housing Plan Element and Fair Share Plan for the Township of Evesham has been prepared in a manner that is consistent with the FHA and MLUL requirements, and contains the following, as spelled out in the FHA:

1. 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;
2. 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;
3. An analysis of the municipality's demographic characteristics, including but not necessarily limited to, household size, income level and age;
4. An analysis of the existing and probable future employment characteristics of the municipality;
5. 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; and
6. A consideration of the lands that are most appropriate for construction of low- and moderate-income housing and of the existing structures most appropriate for conversion to, or rehabilitation for, low and moderate income housing, including a consideration of lands of developers who have expressed a commitment to provide low and moderate income housing.
7. A map of all sites designated by the municipality for the production of low- and moderate income-housing and a listing of each site that includes its owner, acreage, lot, and block;
8. The location and capacities and proposed water and sewer lines and facilities relevant to the designated sites;
9. Copies of necessary applications for amendments to, or consistency determinations regarding, applicable area-wide water quality management plans (including wastewater management plans).

10. A copy of the most recently adopted master plan and where required, the immediately preceding, adopted master plan;
11. For each designated site, a copy of the New Jersey Freshwater Wetlands maps where available. When such maps are not available, municipalities shall provide appropriate copies of the National Wetlands Inventory maps provided by the U.S. Fish and Wildlife Service;
12. A copy of appropriate, United States Geological Survey Topographic Quadrangles for designated sites; and
13. Any other documentation pertaining to the review of the municipal housing element as may be required by the appropriate authority.

This Housing Plan Element and Fair Share Plan will address the Township’s obligations to provide a realistic opportunity for the construction of low- and moderate-income housing in accordance with the Fair Housing Act, the MLUL, the Court, and the terms of the Settlement Agreement with Fair Share Housing Center, for the Third Round period of 1999 – 2025. The preparation of a Housing Plan Element and Fair Share Plan is the first step in petitioning the court for Substantive Certification and Judgement of Repose.

Housing Characteristics

As required by the Municipal Land Use Law, this Housing Plan Element provides an inventory of the Township’s housing stock. The inventory details housing characteristics such as age, condition, purchase/rental value, and occupancy. It also details the number of affordable units available to low- and moderate-income households and the number of substandard housing units capable of being rehabilitated.

Unless otherwise noted, all data is taken from the US Census Bureau’s 2020 Decennial Census count, or the American Community Survey (ACS) 2019 5-year estimates.

Dwelling Units

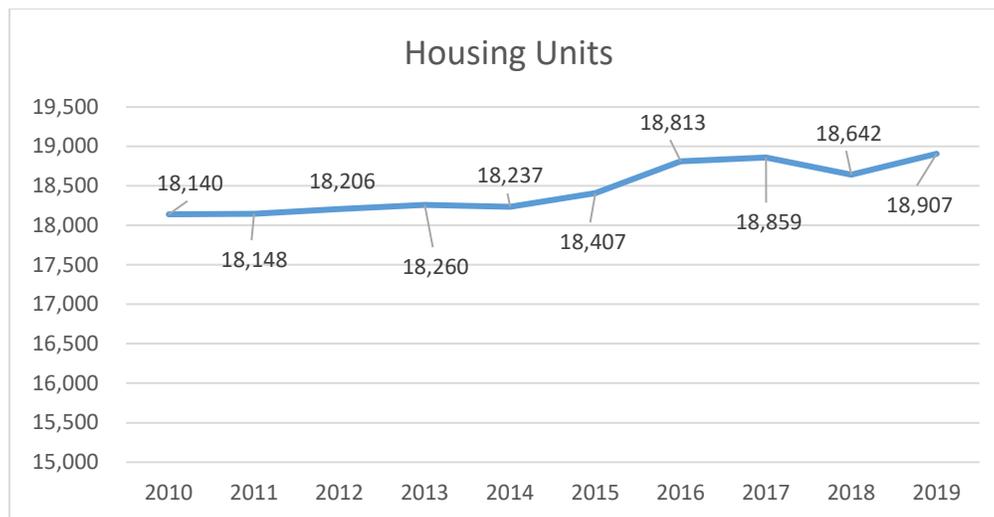
According to 2020 Census counts, there are a total of 19,413 housing units within Evesham Township. This represents an increase in the number of homes in the Township of over 1,100 units since the 2010 Census count. This number seems at odds with the overall increase in population discussed below. The increase in population since 2010 has been approximately the same as the increase in housing units, which is not necessarily consistent with household sizes. This may represent a slight error in the estimates from the American Community Survey.

Housing Units		
Year	Housing Units	
	Total	Percent

Housing Units		
2010		
Total	18,303	100%
Occupied	17,620	96.3%
Vacant	683	3.7%
2020		
Total	19,413	100%
Occupied	18,681	96.2%
Vacant	732	3.8%
Source: 2010, 2020 US Census		

Of those housing units as per the 2020 Census count, 18,681 of them were occupied, and 732 units were vacant. This would represent a vacancy rate of 3.8% of all housing units within the Evesham, which is nearly identical to the 3.7% vacancy rate found in 2010.

Census estimates between 2010 and 2019 show slow and steady growth in the number of housing units in the Township. Although based on the 2020 count, it appears these estimates may have slightly underestimated the figures, as the 2019 estimates were lower than the 2020 count by approximately 500 units.



Tenure and Occupancy

When compared to the State of New Jersey as a whole, Evesham Township has a significantly higher percentage of owner occupied housing units, with nearly 76% of occupied homes being owner occupied. This is 12 percent higher than statewide figures. Census estimates also indicate that for both New Jersey and Evesham Township, vacancy rates in rental housing are much higher than in owner occupied homes.

Housing Tenure and Occupancy		
	New Jersey	Evesham Township

Housing Tenure and Occupancy				
	# of Units	Percent	# of Units	Percent
Occupied Housing Units	3,231,874	100.0%	17624	100.0%
Owner Occupied	2,064,240	63.9%	13381	75.9%
Renter Occupied	1,167,634	36.1%	4243	24.1%
Owner Vacancy Rate		1.6%		1.6%
Rental Vacancy Rate		4.8%		5.6%
Source: 2019 ACS 5-year estimates				

Units in Structure

At over 55 percent, the majority of the housing units within Evesham are detached, single-family homes, which is typical of a suburban or rural community, and consistent with New Jersey overall. Evesham does have more than double the amount of attached single-family homes (townhouses) relative to the state, while the breakdown of the rest of the housing types are similar between the two. Over 20 percent of all housing units in both Evesham and the state are located within multi-family structures. Census estimates indicate that there are no mobile homes within Evesham.

Housing Type – Units in Structure				
	New Jersey		Evesham Township	
	Estimate	Percent	Estimate	Percent
Total housing units	3,616,614	100%	18,907	100%
1-unit, detached	1,933,637	53.5%	10,526	55.7%
1-unit, attached	347,652	9.6%	3,841	20.3%
2 units	329,746	9.1%	303	1.6%
3 or 4 units	227,397	6.3%	749	4.0%
5 to 9 units	171,366	4.7%	1,131	6.0%
10 to 19 units	176,064	4.9%	942	5.0%
20 or more units	395,763	10.9%	1,415	7.5%
Mobile home	34,238	0.9%	0	0.0%
Boat, RV, van, etc.	751	0.0%	0	0.0%
Source: 2019 ACS 5-year estimates				

Age of Housing Stock

Census data estimates that the majority of homes in Evesham Township were constructed prior to 2000. Less than 4 percent of the Township’s housing stock was constructed in the 21st century. Most homes were constructed between 1970 and 1999, with that 30 year period representing the construction of over 2/3 of all the homes in the Township. This is consistent with the suburban expansion of the Philadelphia region that began in the 1950’s and 1960’s, but reached its peak in the 1980’s as peripheral farmland tracts were developed with single family homes.

Age of Housing				
YEAR STRUCTURE BUILT	New Jersey		Evesham Township	
	Estimate	Percent	Estimate	Percent
Total housing units	3,616,614	100%	18,907	100%
Built 2014 or later	57,238	1.6%	226	1.2%
Built 2010 to 2013	62,059	1.7%	393	2.1%
Built 2000 to 2009	327,071	9.0%	2,046	10.8%
Built 1990 to 1999	345,630	9.6%	3,885	20.5%
Built 1980 to 1989	424,716	11.7%	5,445	28.8%
Built 1970 to 1979	458,052	12.7%	3,629	19.2%
Built 1960 to 1969	483,534	13.4%	1,956	10.3%
Built 1950 to 1959	534,259	14.8%	856	4.5%
Built 1940 to 1949	262,063	7.2%	145	0.8%
Built 1939 or earlier	661,992	18.3%	326	1.7%
Source: 2019 ACS 5-year estimates				

Housing Conditions

An inventory of the Township’s housing conditions is found in the two following tables. These conditions are used as indicators of a housing unit being considered substandard, and likely in need of rehabilitation.

Occupants per Room

A housing unit is considered to be overcrowded if there is more than 1 occupant per room within the home. As the chart below indicates, over 99 percent of the homes in Evesham have 1 occupant per room or less, indicating that less than 1 percent of homes would be considered overcrowded. These figures are lower for Evesham Township than the state overall.

Occupants per Room				
	New Jersey		Evesham Township	
	Estimate	Percent	Estimate	Percent
Occupied housing units	3,231,874	100%	17,624	100%
1.00 or less	3,128,560	96.8%	17,492	99.3%
1.01 to 1.50	68,961	2.1%	101	0.6%
1.51 or more	34,353	1.1%	31	0.2%
Source: 2019 ACS 5-year estimates				

Equipment and Plumbing

The availability of utilities and other equipment within a house are some of the conditions that are indicative of a housing structure being considered substandard. These would be housing units that lack

complete plumbing facilities, lacking complete kitchen appliances such as a stove, and if the house does not have any heating equipment. Although these conditions are exceedingly rare in the 21st century, there do still exist homes within New Jersey that do not have indoor plumbing, and do not have proper kitchen equipment.

Deficient Housing Units				
	New Jersey		Evesham Township	
	Estimate	Percent	Estimate	Percent
Occupied housing units	3,231,874	100%	17,624	100%
Lacking complete plumbing	9,148	0.3%	29	0.2%
Lacking complete kitchen	25,246	0.8%	143	0.8%
No telephone service	51,771	1.6%	107	0.6%
Source: 2019 ACS 5-year estimates				

The data indicates that the vast majority of the homes both within the state and within Evesham Township do contain indoor plumbing, a complete kitchen, as well as the availability of telephone service.

Home Values

As of 2019 Census estimates, the median value of an owner occupied home in Evesham Township is just over \$290,000.00, which is slightly below the median home value in New Jersey. The data also indicates that there is not necessarily a wide distribution of homes of high and lower values within Evesham. Compared to the state overall, there are fewer houses valued at less than \$150,000.00 and significantly fewer homes valued at over \$500,000.00. This would be an indication that the homes in Evesham are valued at a level generally for middle income households, and that there are relatively few low income and high income households within the Township.

Value of Owner Occupied Units				
	New Jersey		Evesham Township	
	Estimate	Percent	Estimate	Percent
Owner-occupied units	2,064,240	100%	13,381	100%
Less than \$50,000	45,362	2.2%	221	1.7%
\$50,000 to \$99,999	59,426	2.9%	95	0.7%
\$100,000 to \$149,999	114,642	5.6%	635	4.7%
\$150,000 to \$199,999	197,699	9.6%	1,498	11.2%
\$200,000 to \$299,999	461,574	22.4%	4,730	35.3%
\$300,000 to \$499,999	698,419	33.8%	5,394	40.3%
\$500,000 to \$999,999	412,605	20.0%	768	5.7%
\$1,000,000 or more	74,513	3.6%	40	0.3%
Median (dollars)	\$335,600	(X)	\$290,300	(X)
Source: 2019 ACS 5-year estimates				

Gross Rent

For renter occupied households in the Township, the median monthly rent paid by tenants is approximately \$1,520, which is higher than the state median monthly gross rent by nearly \$200. This would represent a large disparity in renter costs compared to ownership costs, as the median home value is less than the state median home value, but median renters in the Township are paying much more than in other parts of the state.

Similar to the home values discussed above, the monthly rents estimated for units in Evesham also displays a relatively narrow distribution. There are fewer units with rents below \$1,000.00 a month, and also fewer units that have a monthly rent greater than \$3,000.00 when compared to the state as a whole.

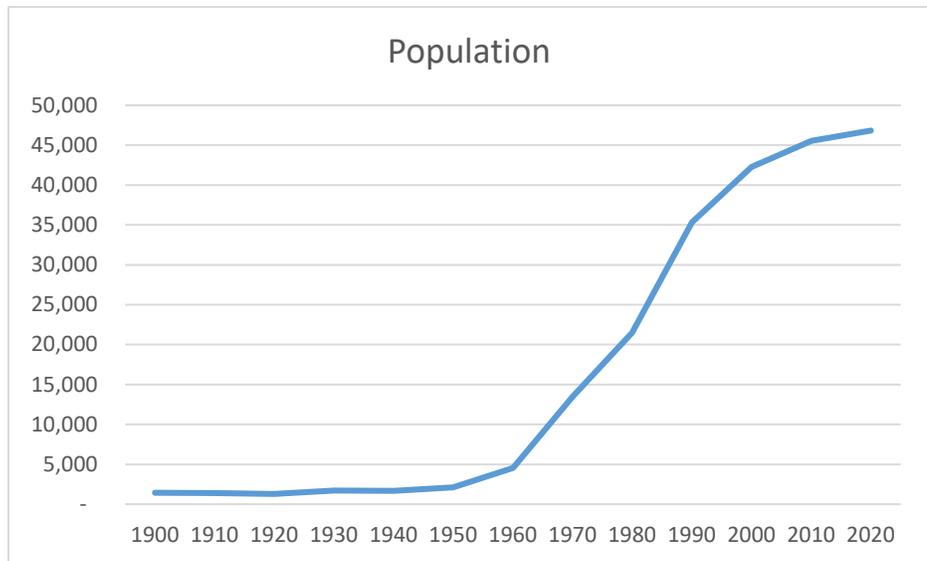
Monthly Gross Rent of Renter Occupied Units				
	New Jersey		Evesham Township	
	Estimate	Percent	Estimate	Percent
Occupied units paying rent	1,130,765	100%	4,122	100%
Less than \$500	89,901	8.0%	201	4.9%
\$500 to \$999	181,373	16.0%	245	5.9%
\$1,000 to \$1,499	438,073	38.7%	1,566	38.0%
\$1,500 to \$1,999	249,105	22.0%	1,205	29.2%
\$2,000 to \$2,499	96,560	8.5%	731	17.7%
\$2,500 to \$2,999	40,586	3.6%	123	3.0%
\$3,000 or more	35,167	3.1%	51	1.2%
Median (dollars)	1,334	(X)	1,520	(X)
No rent paid	36,869	(X)	121	(X)

Demographic Characteristics

Population

Evesham Township has a current population of 46,826 as of the 2020 Census count. This is a slight increase in the population of 1,288 persons from the population of 45,538 as of the 2010 Census count. Although this is an increase, this is a relatively minor increase in the overall population of the Township and continues a flatlining and stabilizing trend in the population. Dating back to 1950, the population had been very small in Evesham, ranging between 1,000 and 2,000 persons for decades. In the post-war years that saw rapid suburban expansion, the Township’s population grew exponentially. The largest growth period, which coincided with the growth in housing construction, was the 1980’s, where the population grew from 21,508 in 1980 to 35,309 in 1990. Since 2000, the population continues to increase, but at a much slower pace than in prior decades.

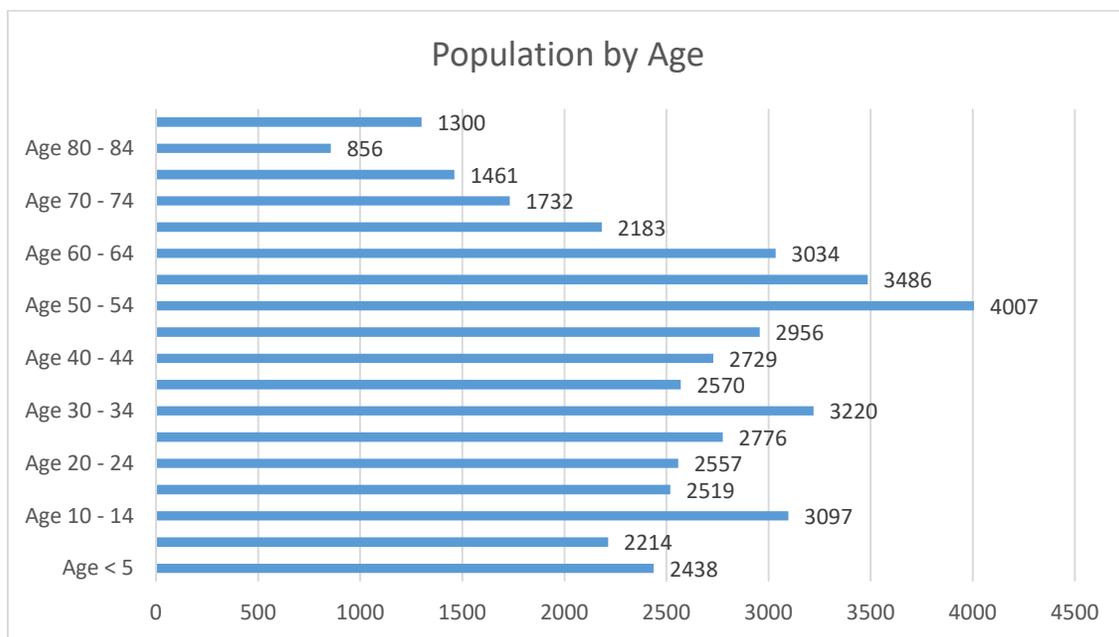
Year	Population
1900	1,429
1910	1,408
1920	1,284
1930	1,694
1940	1,655
1950	2,121
1960	4,548
1970	13,477
1980	21,508
1990	35,309
2000	42,275
2010	45,538
2020	46,826



The Delaware Valley Regional Planning Commission (DVRPC) provides population projections for the 9-county Philadelphia metropolitan region. DVRPC’s projections for Evesham Township show continued growth, at a similar slow pace. The projection is that by 2050, the Township will have 47,864 residents, which would be an increase of approximately 1,000 people in the next 29 years. These projections are based on a combination of previous trends, as well as factors such as availability of land and infrastructure.

Age & Sex

The Township’s population of just over 46,000 is generally skewed towards a middle aged demographic, the two largest age cohorts according to 2019 ACS estimates are those between the ages of 50-54, and then 55-59, with 4,007 and 3,486 persons respectively.



Of the population, estimates indicate a split of 51.2% female versus 48.8% male. A slightly higher percentage of females in the Township is generally consistent with both state and national figures.

Race / Ethnicity

The majority of the residents of Evesham Township are considered to be white, and non-Hispanic or latinx. Nearly 85 percent of residents identify as White, while approximately 6 percent each identify as Black or Asian. 2.1 percent are considered to be two or more races. Of the racial composition of the Township, approximately 5 percent also identify as being ethnically Hispanic or latinx.

Race	
White	84.5%
Black or African American	5.9%
American Indian and Alaska Native	0.0%
Asian	6.0%
Native Hawaiian and Pacific Islander	0.0%
Two or More Races	2.1%
Hispanic or Latinx (of any race)	5.1%
Source: 2019 ACS 5-year estimates	

Census data also indicates that over 9.3 percent of the population is foreign born.

Household Composition

The average household size in Evesham is 2.54, although a renter occupied household on average is less than 2 persons per household, and an owner occupied household on average has 2.75 persons. These numbers generally indicate that within Evesham, renter occupied households are more likely to be single persons or couples, while owner occupied homes are more likely to be occupied by larger families with children.

Household Composition		
	New Jersey	Evesham Township
HOUSEHOLDS		
Total households	3,231,874	17,624
Average household size	2.69	2.54
Average household size (owner)	2.80	2.75
Average household size (renter)	2.50	1.89
FAMILIES		
Total families	2,228,108	11,891
Average family size	3.27	3.16

Household Composition

Source: 2019 ACS 5-year estimates

Housing Affordability

Affordability - For Low- and Moderate-Income Households, Evesham Township is in Housing Region 5, which comprises of Burlington, Camden, Gloucester counties. Based on the most current regional income limits as prepared by the Affordable Housing Professionals of New Jersey (AHPNJ), the median household income for a three-person household in the region is \$86,940. A three-person moderate-income household, defined as those earning 80 percent of the median income, would have an annual income not exceeding \$69,552. A low-income household is considered those with an income of less than 50% of the median, or \$43,470, and a very low-income household is defined as one with an income of less than 30% of the median, or less than \$26,082.

An affordable sales price for a three-person moderate-income household earning 80 percent of the median income is would be a home valued at less than \$200,000, and a home affordable for a low income household would be valued at under \$150,000. This is based on the UHAC affordability controls outlined in N.J.A.C. 5:80-26.3, where to be affordable, a household should not be spending more than 30 percent of their income on housing expenses. According to 2019 estimates, the percentage of housing units in the Township valued at less than \$200,000 was 18 percent, and the percentage of homes valued at under \$150,000 was approximately 6.8 percent, meaning that approximately 18 percent of existing homes in Evesham would be potentially affordable to a moderate income household, and 6 percent would be potentially affordable to a low income household.

For rental units, affordability calculations are very similar, but based on the monthly rent rather than the overall sales price of a home. Assuming that at least some utilities are included in the price of rent, an affordable rent for a very-low income household – that is one earning less than 30% of the area median – would range from approximately \$500 to \$700 a month. While affordable rents for a moderate income household – one earning between 50% and 80% of area median income, would range from approximately \$1,000 to \$1,450 a month depending on the household size and the number of bedrooms in the dwelling unit.

Household Income

The median household income for a home in Evesham Township was \$100,720 as per the 2019 Census estimates. This is considerably higher than the median income for a household in New Jersey overall. The table below illustrates the range of household incomes in Evesham in comparison to those of the state as a whole. The largest income category that the Census data tabulates is households with over \$150,000 of annual income. This is also the largest category of households in the Township, with over 26.5 percent. The percentage of Evesham households gets progressively smaller as the income category gets lower, indicating that there are relatively few low and moderate income households within Evesham compared to the averages throughout the state. More than 2/3 of Township households have

an income that would be considered above moderate level for a three person household in Region 5. This is typical of most suburban communities with higher percentages of owner occupied single family dwellings.

Household Income				
	New Jersey		Evesham Township	
	Estimate	Percent	Estimate	Percent
Occupied housing units	3,231,874	100	17,624	100
Less than \$5,000	83,348	2.6%	222	1.3%
\$5,000 to \$9,999	76,263	2.4%	176	1.0%
\$10,000 to \$14,999	102,172	3.2%	287	1.6%
\$15,000 to \$19,999	112,502	3.5%	437	2.5%
\$20,000 to \$24,999	116,888	3.6%	292	1.7%
\$25,000 to \$34,999	221,628	6.9%	1,032	5.9%
\$35,000 to \$49,999	302,856	9.4%	1,370	7.8%
\$50,000 to \$74,999	471,870	14.6%	2,402	13.6%
\$75,000 to \$99,999	392,216	12.1%	2,526	14.3%
\$100,000 to \$149,999	571,098	17.7%	4,218	23.9%
\$150,000 or more	781,033	24.2%	4,662	26.5%
Median household income (dollars)	82,545	X	100,720	X
Source: 2019 ACS 5-year estimates				

Housing Costs

Census data also provides estimates on not just the value of housing stock in the Township, but also the costs of housing when certain characteristics such as utilities are included. The data indicates that the housing stock within Evesham Township in general costs over \$1,000 a month. Less than 14 percent of homes cost less than \$1,000 a month when utilities are included, and more than 60 percent of the homes have monthly costs over \$1,500.

Monthly Housing Costs				
	New Jersey		Evesham Township	
	Estimate	Percent	Estimate	Percent
Less than \$300	66,955	2.1%	180	1.0%
\$300 to \$499	74,100	2.3%	144	0.8%
\$500 to \$799	204,132	6.3%	715	4.1%
\$800 to \$999	270,868	8.4%	1,267	7.2%
\$1,000 to \$1,499	828,456	25.6%	4,374	24.8%
\$1,500 to \$1,999	587,389	18.2%	3,537	20.1%
\$2,000 to \$2,499	399,339	12.4%	3,501	19.9%

Monthly Housing Costs				
\$2,500 to \$2,999	283,441	8.8%	1,851	10.5%
\$3,000 or more	480,325	14.9%	1,934	11.0%
No cash rent	36,869	1.1%	121	0.7%
Median (dollars)	1,616	X	1,772	X
Source: 2019 ACS 5-year estimates				

Costs as a Percentage of Monthly Household Income

In addition to simply reviewing household income and the costs of housing, Census ACS estimates also include data on the percentage of a household’s income that is devoted to housing costs. As noted above, if a household is spending greater than 30 percent of their income on housing, that household would be considered cost burdened.

The data shows that the lower the income brackets, - those households earning less than \$75,000 annually - the more likely it is that the household is spending more than 30 percent of its income on housing costs. More than 24 percent of Evesham Township households are estimated to have an income of less than \$75,000 and also spend more than 30 percent of that income on housing costs.

Monthly Housing Costs as a Percentage of Household Income				
	New Jersey		Evesham Township	
	Estimate	Percent	Estimate	Percent
Less than \$20,000	328,472	10.2%	1,008	5.7%
Less than 20 percent	9,496	0.3%	22	0.1%
20 to 29 percent	26,920	0.8%	0	0.0%
30 percent or more	292,056	9.0%	986	5.6%
\$20,000 to \$34,999	332,197	10.3%	1,324	7.5%
Less than 20 percent	16,480	0.5%	130	0.7%
20 to 29 percent	27,739	0.9%	116	0.7%
30 percent or more	287,978	8.9%	1,078	6.1%
\$35,000 to \$49,999	298,208	9.2%	1,362	7.7%
Less than 20 percent	23,326	0.7%	64	0.4%
20 to 29 percent	65,637	2.0%	181	1.0%
30 percent or more	209,245	6.5%	1,117	6.3%
\$50,000 to \$74,999	465,926	14.4%	2,367	13.4%
Less than 20 percent	93,332	2.9%	384	2.2%
20 to 29 percent	163,696	5.1%	892	5.1%
30 percent or more	208,898	6.5%	1,091	6.2%
\$75,000 or more	1,734,374	53.7%	11,362	64.5%
Less than 20 percent	1,021,636	31.6%	6,472	36.7%
20 to 29 percent	489,475	15.1%	3,789	21.5%

Monthly Housing Costs as a Percentage of Household Income				
30 percent or more	223,263	6.9%	1,101	6.2%
Zero or negative income	35,828	1.1%	80	0.5%
No cash rent	36,869	1.1%	121	0.7%
Source: 2019 ACS 5-year estimate				

Employment Characteristics

The MLUL requires that the Housing Plan Element include data on employment levels in the community to determine economic activity and potential access to employment. The following tables present information on the Township’s employment characteristics.

Employment Status

For Township residents age 16 and over, Census estimates show that approximately 70 percent are considered to be in the labor force. That means that they are either currently employed or actively seeking employment. Of those in the labor force, the estimated unemployment rate was just 3.5 percent. This represents a significant lowering of the unemployment rate, which was previously estimated to be nearly 7 percent in 2014. However, these data are estimates from 2019 which were pre-COVID 19 levels of employment. Although more recent data is not available on the Township level, it is likely that the current unemployment rate is significantly higher than these Census estimates.

EMPLOYMENT STATUS				
	New Jersey		Evesham Township	
	Estimate	Percent	Estimate	Percent
Population 16 years and over	7,148,309	100%	36,787	100%
In labor force	4,689,849	65.6%	25,918	70.5%
Civilian labor force	4,680,584	65.5%	25,844	70.3%
Employed	4,422,491	61.9%	24,952	67.8%
Unemployed	258,093	3.6%	892	2.4%
Armed Forces	9,265	0.1%	74	0.2%
Not in labor force	2,458,460	34.4%	10,869	29.5%
Civilian labor force	4,680,584	4,680,584	25,844	25,844
Unemployment Rate	(X)	5.5%	(X)	3.5%
Source: 2019 ACS 5-year estimates				

Evesham Township residents hold a diverse array of jobs in many fields of employment. Census data tracks employment statistics based on both occupation and industry. The largest percentage of residents are employed in management, business, science, and arts occupations, with many of those people working in the educational and healthcare industry. Relatively few residents of Evesham are currently working in the agricultural or forestry industry.

Occupation & Industry of Workers				
	New Jersey		Evesham Township	
	Estimate	Percent	Estimate	Percent
OCCUPATION				
Civilian employed population 16 years and over	4,422,491	4,422,491	24,952	24,952
Management, business, science, and arts occupations	1,905,627	43.1%	12,933	51.8%
Service occupations	712,040	16.1%	3,134	12.6%
Sales and office occupations	981,612	22.2%	5,678	22.8%
Natural resources, construction, and maintenance occupations	317,509	7.2%	1,141	4.6%
Production, transportation, and material moving occupations	505,703	11.4%	2,066	8.3%
INDUSTRY				
Civilian employed population 16 years and over	4,422,491	4,422,491	24,952	24,952
Agriculture, forestry, fishing and hunting, and mining	14,933	0.3%	46	0.2%
Construction	262,803	5.9%	1,204	4.8%
Manufacturing	360,551	8.2%	2,060	8.3%
Wholesale trade	147,261	3.3%	901	3.6%
Retail trade	481,529	10.9%	2,645	10.6%
Transportation and warehousing, and utilities	270,949	6.1%	1,051	4.2%
Information	119,077	2.7%	698	2.8%
Finance and insurance, and real estate and rental and leasing	375,112	8.5%	2,550	10.2%
Professional, scientific, and management, and administrative and waste management services	596,872	13.5%	3,572	14.3%
Educational services, and health care and social assistance	1,056,207	23.9%	5,966	23.9%

Occupation & Industry of Workers				
Arts, entertainment, and recreation, and accommodation and food services	358,882	8.1%	1,769	7.1%
Other services, except public administration	191,334	4.3%	1,023	4.1%
Public administration	186,981	4.2%	1,467	5.9%
Source: 2019 ACS 5-year estimates				

The US Census Bureau’s “On the Map” database indicates that there are a total of just over 23,000 jobs in Evesham Township as of 2019 estimates. These jobs are concentrated primarily in the Marlton area in the northern end of the Township along Route 70. Data also shows that for residents of Evesham, their top places of employment are in the City of Philadelphia first, and second is within the Marlton area of the Township. Other primary destinations of employment include nearby Ramblewood in Mount Laurel Township, the City of Camden, and the City of Trenton.

Jobs Counts by Places Where Workers are Employed - Primary Jobs		
	2019	
	Count	Share
Philadelphia city, PA	2,463	10.5%
Marlton CDP, NJ	1,267	5.4%
Ramblewood CDP, NJ	634	2.7%
Camden city, NJ	579	2.5%
Moorestown-Lenola CDP, NJ	568	2.4%
Greentree CDP, NJ	550	2.4%
Trenton city, NJ	353	1.5%
Echelon CDP, NJ	347	1.5%
New York city, NY	267	1.1%
Golden Triangle CDP, NJ	240	1.0%
All Other Locations	16,124	68.9%
Source: US Census On the Map		

Data from DVRPC indicates that the majority of residents of Evesham commute to work alone in a car. Over 82 percent drive alone to work regularly, whereas approximately 10 percent take some form of public transportation. American Community Survey estimates from the US Census Bureau show that the average commuting time to work is just over 30 minutes. These data suggest that there are many opportunities for employment within a reasonable commute distance, as well as options available to residents to commute to these jobs.

Housing and Employment Projections

DVRPC also provides projections for employment within an area. Current estimates from DVRPC are that there are just over 23,000 jobs within Evesham Township. DVRPC projects that by 2050, there will be 25,376 jobs in the Township. This projected increase is anticipated to be gradual over the next 30 years. However, economic patterns can be unpredictable, and sharp increases or decreases in employment can occur in any year.

Projections of Municipality’s Housing Stock

With the Township forecast to grow by approximately 1,000 persons by 2050, this modest growth would represent approximately 390 to 400 new households in the Township in that timeframe. With the relatively low vacancy rate of existing homes in Evesham, these new households would have to be primarily in newly constructed homes in order to accommodate the growth.

However, given the obligations of the Township to accommodate its fair share of low and moderate income households just for Round 3 as outlined in the Fair Share Plan, it is likely that the Township’s housing stock will grow by more than 300 units well before 2050. This Plan provides the mechanisms for the Township’s housing stock, both market rate and affordable, to reach this number by 2025, the end of the Third Round reporting period.

Consideration of Lands Suitable for Affordable Housing

The New Jersey Fair Housing Act (N.J.S.A. 52:27D-310(f)) requires that the Housing Element provide a narrative that includes “a consideration of the lands that are most appropriate for construction of low and moderate income housing and of the existing structures most appropriate for conversion to, or rehabilitation for, low and moderate income housing, including a consideration of lands of developers who have expressed a commitment to provide low and moderate income housing.”

Since the first iteration of the Third Round COAH rules in 2004, Evesham Township has been tracking realistic and probable development potential and has been considering where affordable housing may be included. The Township keeps tabs on where new residential opportunities may arise or may be created, which lands would be most appropriate to accommodate low- and moderate-income housing, and how much affordable housing can be included in a development while maintaining financial feasibility. The Township has maintained an open dialogue with developers who may be interested in providing low- and moderate-income housing; whether as 100% affordable projects or as inclusionary projects. The open communication has enabled the Township and housing developers to identify affordable and inclusionary housing opportunities that satisfy multiple objectives. In the years since the initial version of the Third Round rules were released, the housing market has evolved and so too has the Township’s thinking about the best means to accommodate and integrate affordable housing into the overall planning picture.

The Fair Share Plan that follows includes many of the lands that have been determined to be suitable for development of housing, both in terms of the physical characteristics and context of the lands, as well as the level of interest expressed by private developers. As a result, the sites discussed represent suitable lands for affordable housing as well as the locations where development projects are feasible and realistic. However the Township continues to evaluate the potential for new housing sites, and the exclusion of any particular property in this Plan does not necessarily suggest that those lands are inherently unsuitable for development with affordable housing.

One area of the Township that could be potentially suitable for residential or mixed-use development in the future, although not included in this plan for credits at this time, would be the office park on Centre Boulevard at Block 24.21, Lot 3, is a small scale business park located otherwise in a residential area. This particular property is not currently zoned to permit residential uses though, so the Township should consider this property for a potential rezoning to allow for moderate density residential development and/or mixed use.

FAIR SHARE PLAN

A Fair Share Plan has been defined in prior COAH regulations as:

“Fair Share Plan” means that plan or proposal, which is in a form that may readily be converted into an ordinance, by which a municipality proposes to satisfy its obligation to create a realistic opportunity to meet its fair share of low and moderate income housing needs of its region and which details the affirmative measures the municipality proposes to undertake to achieve its fair share of low and moderate income housing, as provided in Sections 9 and 14 of the Fair Housing Act, addresses the development regulations necessary to implement the Housing Element, and addresses the requirements of N.J.A.C. 5:93-7 through 11.

The Fair Share Plan for the Evesham Township is broken up into three sections; a Present Need or Rehabilitation Obligation, the Prior Round (1987-1999) Obligation, and the Third Round or Prospective Need Obligation (1999-2025).

The Township’s Fair Share Plan specifically describes the completed and proposed mechanisms to address the prior round obligation, present need obligation, gap present need obligation, and prospective need obligation. Evesham Township’s present and prospective need numbers for the Third Round (1999 to 2025) were arrived at through negotiations between the Township and Fair Share Housing Center, and with assistance from the Court appointed Special Master. Through the Court’s Order of Fairness and Compliance dated August 23, 2018, and the Settlement Agreement dated August 16, 2018, the Township’s affordable housing obligation has been determined to be 680 units for the period running from 1999 through 2025, in addition to the rehabilitation (present need) obligation of 15 units, and the Prior Rounds obligation of 534 units.

Evesham Township’s intent throughout the settlement discussions was to arrive at a fair share number that would provide realistic opportunities for affordable housing that make sense within the local context. In evaluating opportunities for affordable housing, the Township has used the “presumptive” densities and set asides that have been established through Mount Laurel litigation and COAH’s rulemaking as a reference and guide, but has sought to apply densities and set asides that meet not only the affordable housing objectives, but also objectives related to downtown revitalization, encouraging a vibrant economy and mix of housing types, respect for the natural environment, access to transportation, and sewer and water infrastructure. The proposals for fair share compliance are responsive to the existing and evolving land use patterns in the area, the Township’s vision for the particular area, and the financial feasibility of the set aside given the density, the location, and site costs and constraints. If a property is vacant and located within a “suburban” area, it does not necessarily follow that the only appropriate means to develop the property is at a density of six units per acre with a 15% or 20% affordable set aside. Within Evesham, the density of inclusionary sites ranges from 2.32 dwelling units per acre to 44 dwelling units per acre. Each project and site has unique attributes that have been considered in the context of the overall land use picture. The Township’s deliberative planning process has enabled a comprehensive fair share plan that provides opportunities for a variety of housing types and affordable housing set asides.

A map of the proposed locations to provide affordable housing can be found in Appendices L.1 and L.2.

Fair Share Obligation

The Township has the following cumulative affordable housing obligations, as agreed to in the court approved settlement agreement with Fair Share Housing Center:

- Rehabilitation / Present Need = 94 Units (adjusted to 15)
- Prior Round (1987-1999) Prospective Need = 534 Units
- Third Round (1999-2025) Prospective Need = 680 Units

A copy of the Township’s Settlement Agreement with Fair Share Housing Center establishing the obligations and mechanisms identified to satisfy those obligations can be found in Appendix A.1, and an amended Settlement Agreement can be found in Appendix A.4. Resolutions of the Township Council authorizing and executing these Settlement Agreements can be found in Appendices A.2 and A.5.

Income Levels

Evesham Township is in COAH’s Region 5, which includes Burlington, Camden and Gloucester Counties. 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 are a subset of “low income” households, and are defined as households earning 30% or less of the regional median income. The Township is required to ensure that 13% of all affordable housing units produced after July 1, 2008 are “very low income” units. Half of the very low income units must be available to families.

A copy of the 2021 Regional Income Limits as published by the Affordable Housing Professionals of New Jersey can be found in Appendix A.3.

Present Need (Rehabilitation) Obligation

The Township has a rehabilitation, or present need obligation of 94 units. However, this obligation has been adjusted to 15 units.

The rehabilitation share number was arrived at using variables that are included in the American Community Survey (ACS) and the US Census to estimate the number of units in the Township that are “deficient”. The variables included in the analysis are from the 2009-2013 American Community Survey: 1) the number of units reported to have incomplete kitchens, 2) the number of units reported to have incomplete plumbing, and 3) the number of units that are over 50 years old and “crowded”. Crowded units are those that have more than one person per room in the house. Overlap is estimated so that the same unit is not counted twice. The analysis then calculates the total number of “deficient” units that are also occupied by low- and moderate-income households (by multiplying the number of deficient units by the percentage of low/moderate income households in Burlington County). For Evesham this analysis yielded a 94-unit rehabilitation obligation.

The August 16, 2018 Settlement Agreement (paragraph 12B) provided that the Township could apply to the Court appointed Special Master and the Court, on notice to FSHC, to adjust the present need number if more accurate information is identified demonstrating that an adjustment is warranted. In August of 2019 Evesham conducted a structural conditions/exterior housing survey following the procedure outlined in Appendix C of the Second Round COAH rules. First the age of housing on every residential street in the Township was reviewed. A list of streets, grouped by neighborhood was prepared for the survey. Survey guidelines were provided to the Construction Official, who conducted the survey over the course of several days. The survey found that there are 32 units that qualify as substandard. Applying the percentage of units occupied by low and moderate income households in Burlington County (45.59%), it was determined that the present need number is 15. The survey procedure and list of streets surveyed are included as Appendix D.8

Between 2002 and 2012, the Township administered an in-house rehabilitation assistance program that assisted numerous residents with rehabilitation work utilizing funds from the Affordable Housing Trust Fund.

Between 2010 and 2012 the Township rehabilitated ten (10) homes. Burlington County’s Rehabilitation Program assisted five (5) homeowners between 2010 and 2017.

Appendix D.8 includes a list of rehabilitated units. The Township requests credit for the units already rehabilitated for which an average of more than \$10,000 per unit was spent on hard costs.

A copy of the municipal rehabilitation program manual can be found in Appendix D.8.

Through both the Municipal and County rehabilitation programs, the Township has satisfied its 15 unit present need obligation.

Site Suitability

The Fair Share Plan must demonstrate site suitability for proposed new units that are not yet fully approved, as required by N.J.A.C. 5:93 -5.3.

- A. An “available site” is a site with clear title, and that is free of encumbrances which preclude development for low- and moderate-income housing.
 - All sites in the compliance plan are “available”.

- B. A “developable site” is a site that has access to appropriate water and sewer infrastructure, and is consistent with the applicable area-wide water quality management plan and wastewater management plan.
 - All sites in the compliance plan are “developable”. All sites are within the sewer service area and will be served by the Evesham Municipal Utilities Authority (MUA). The executive director of the MUA and the MUA’s engineer have calculated the total projected flows from the affordable units and the associated market rate units and have confirmed that there is adequate capacity at the Elmwood and Woodstream treatment facilities to serve all of the proposed development. Appendix E includes a calculation of projected sewer flow for all of the developments that are not yet completed.

- C. A “suitable site” is a site that is adjacent to compatible land uses, has access to appropriate streets and is consistent with the environmental policies delineated in N.J.A.C. 5:93-4 (not in wetlands, flood hazard areas, steep slopes).
 - All sites in the compliance plan are “suitable”.

- D. An “approvable site” is a site that may be developed for low- and moderate-income housing in a manner consistent with the rules or regulations of all agencies with jurisdiction over the site. A site may be approvable although not currently zoned for low and moderate income housing.
 - All sites in the compliance plan are “approvable”. With the exception of the DPW Yard, and the Habitat for Humanity Oak Avenue project, all projects in the compliance plan are either completed, under construction, or have already been approved by the appropriate board.

Prior Round Obligation

The Township has a requirement of 534 units in order to satisfy its Prior Round (1987 – 1999) obligation. In accordance with previous COAH rules found at N.J.A.C. 5:93, the Township must meet the following minimum and maximum requirements in addressing the 534 total unit obligation.

- **Age Restricted Units:** a municipality may receive credits for age-restricted affordable housing at up to 25 percent of the obligation, minus any RCA contributions.
 - $(534 - 199) \times 0.25 = 83.75$
 - The Township may claim a maximum of 83 credits through age-restricted units.
- **Rental Units:** a municipality has an obligation to provide a realistic opportunity for the construction of rental housing of at least 25 percent of the total obligation.
 - $534 \times 0.25 = 133.5$
 - The Township has an obligation to provide at minimum 134 rental units.
- **Income Distribution:** The Township is required to provide half of the total units as affordable to low-income households:
 - $225 \text{ Total units} \times 0.5 = 113$
 - The Township has an obligation to provide at minimum 113 low income units.
- **Rental Bonus Credits:** A municipality shall be granted a rental bonus for rental units that are constructed and conform to the standards contained in N.J.A.C. 5:93-5.8(d) and 5.9(d) and 5:93-7. A municipality shall receive two units (2.0) of credit for rental units available to the public, but no rental bonuses shall be granted for rental units in excess of the rental obligation. A municipality shall receive one and one-third 1.33 units of credit for age restricted rental units. However no more than 50 percent of the rental obligation shall receive a bonus for age restricted rental units.
 - The Township may claim bonus credits for rental units up to 134 bonus credit units. This may be either through 2.0 credits for family rental units, or 1.33 credits for age-restricted rental units, provided that no more than 50 percent of the rental obligation is met through age-restricted units.

Prior Round Compliance Mechanisms

In accordance with the Township’s Settlement Agreement with Fair Share Housing Center, the Township has addressed its Prior Round Obligation through the development projects listed below. The Township satisfies its Prior Round obligation through several regional contribution agreements (RCA) with other communities within Region 5, as well as through multiple inclusionary family for sale developments, and many special needs housing facilities.

Prior Round Compliance Mechanisms				
Project	Type	Credits	Bonus	Total
RCA Gloucester City	RCA	40	0	40
RCA Gloucester City	RCA	12	0	12
RCA Pemberton Township	RCA	10	0	10
RCA Pemberton Township	RCA	3	0	3
RCA Burlington City	RCA	10	0	10
RCA Beverly City	RCA	10	0	10
RCA Beverly City	RCA	50	0	50
RCA Palmyra	RCA	47	0	47
RCA Palmyra	RCA	17	0	17
Whitebridge Village	Family for Sale	46	0	46
Westbury Chase	Family for Sale	6	0	6
Shannon Greene	Family for Sale	4	0	4
Evesboro Downs	Family for Sale	1	0	1
Woodview	Family Rental	44	44	88
Inglis House Gardens	Family Rental	16	16	32
Elmwood House	Senior Rental	69	11	80
Oaks – 52 North Maple	Special Needs	3	3	6
Bancroft – 28 S. Elizabeth	Special Needs	4	4	8
Bancroft – 8 Elmgate	Special Needs	4	4	8
Community Options – 102 Greenbrook	Special Needs	4	4	8
Community Options – 35 Hanover	Special Needs	4	4	8
Community Options – 38 Fourth	Special Needs	4	4	8
Community Options – North Locust	Special Needs	4	4	8
QMA – Evans	Special Needs	4	4	8
QMA – Pelham	Special Needs	4	4	8
Durand Academy	Special Needs	4	4	8
Totals		424	110	534

Descriptions of each prior round project and mechanism are included below:

REGIONAL CONTRIBUTION AGREEMENT (RCA)

Through nine regional contribution agreements with neighboring communities, Evesham has secured 199 credits through a total of \$4,065,000 in affordable housing investments.

RCA Burlington City = 10 credits

Evesham Township entered into a regional contribution agreement with Burlington City in 2006, where Evesham provided \$200,000 towards rehabilitation of homes in Burlington at an average cost of \$20,000 per unit, for a total of 10 credits. The funding for this RCA came from the MCW Enterprises / Brookview Apartments development.

RCA Gloucester City = 12 credits

A regional contribution agreement between Evesham Township and the City of Gloucester City was approved in 1999, and included \$240,000 for 12 credits at \$20,000 per unit. The funding was provided through the Ridings at Mayfaire development.

RCA Gloucester City = 40 credits

The Township, through the Hearthstone development, provided a total of \$800,000 in a second regional contribution agreement with Gloucester City in 2000. This payment was at a cost per unit of \$20,000 for a total of 40 credits.

RCA Pemberton Township = 10 credits

In 2002, the Heron Pointe development provided \$200,000 in a regional contribution agreement with Pemberton Township. At a cost of \$20,000 per unit, this represents 10 credits towards the prior round obligation.

RCA Pemberton Township = 3 credits

MCW Enterprises / Brookview Apartments provided an additional \$60,000 in funding for Pemberton Township in 2003, resulting in 3 credits.

RCA Beverly City = 50 credits

In 2005, a regional contribution agreement between Evesham and Beverly City was approved for \$1,000,000. At \$20,000 per unit, this agreement counts for 50 credits. Funding for this RCA was provided by the Orleans / Artdor development.

RCA Beverly City = 10 credits

The MCW Enterprises / Brookview Apartments development provided additional funds for Beverly City at a total of \$200,000, for 10 credits at a cost of \$20,000 per unit. This agreement was completed in 2006.

RCA Palmyra = 47 credits

In 2005, a \$940,000 regional contribution agreement between Evesham and the Borough of Palmyra was approved for 47 credits. Funding for this agreement came from the Baseman and ERP developments.

RCA Palmyra = 17 credits

The Borough of Palmyra was the recipient of another regional contribution agreement in 2005 when the Beazer / Marlton Woods project provided \$425,000 towards affordable housing. This agreement differed from the rest in that the cost per unit of funding was \$25,000 rather than \$20,000, which resulted in 17 credits for Evesham Township.

Documentation on these Regional Contribution Agreements can be found in Appendix B.2

FAMILY FOR SALE

Whitebridge Village: 46 credits

Block 17, Lots 7.01 and 9

Squirrel Road

Status: Completed

Whitebridge Village is an inclusionary family for sale development that was completed in 1996, and includes a 30-year deed restriction on each home. The project includes 21 low income 2-bedroom units and 25 2-bedroom moderate income units.

Westbury Chase: 6 credits

Block 8.02 through 8.08

Faybrooke Drive, Tenby Lane, Hewlings Drive

Status: Completed

This project is an inclusionary development of family for sale unit that is completed and occupied. The development initially had 7 affordable moderate income 3-bedroom homes, however one unit was lost to foreclosure. The home at 31 Faybrooke was lost to foreclosure in 1998. Therefore only 6 credits are being claimed from this development.

Shannon Greene: 4 credits

Block 51.02, Lot 20

Kings Grant Drive, Cranberry Court

Status: Completed

The inclusionary development known as Shannon Green consists of 5 moderate income 2-bedroom condo units in a larger condominium development. The project is completed and occupied. Initial occupancy occurred in 1988. Two units have been lost to foreclosure, 14 Cranberry Court and 37 Cranberry Court have both had their controls extinguished as a result of foreclosure. However the affordability controls at 37 Cranberry Court had been in place for 26 years prior to the foreclosure in 2013. A copy of the certificate of occupancy for 37 Cranberry Court showing that the affordability controls were enacted in 1987 is included in Appendix H.3.

As a result of the foreclosure, 4 of the 5 initial units will be claimed as Prior Round credits, even though there are now only 3 affordable homes in this development.

Evesboro Downs: 1 credit

Block 24.2, Lot 1

Maresfield Court

Status: Completed

There is one unit in the Evesboro Downs neighborhood that was completed in 1991. It is a moderate income 2-bedroom condominium that will be claimed as 1 credit towards the Prior Round obligation.

Representative deeds for Prior Round family for sale units for Shannon Green and Westbury Chase can be found in Appendix J.19.a

FAMILY RENTAL

Woodview / Whitebridge Farm: 44 credits + 44 rental bonus credits

Block 17, Lot 11

Daphne Drive, Pavonia Circle

Status: Completed

The Woodview project consists of 44 affordable rental units within an inclusionary community. The project has 22 low income units and 22 moderate income units. The development is completed and occupied. Although the project was completed in 2000, a formal deed restriction was never recorded on the property. NJHMFA HAS served as the project's administrative agent from its inception, until the current administrative agent took over those duties in 2013. Despite the lack of formal controls, the project has been administered and marketed as an affordable project since its initial occupancy. The Township is currently working with the owners of the property to record a new deed restriction on the property.

	1 Bed	2 Bed	3 Bed	Totals	Percent
Low	10	9	3	22	50%
Moderate	10	9	3	22	50%
Totals	20	18	6	44	100%

A draft of the deed restriction and records of administrative activity dating back to 2006 can be found in Appendix H.2.

Inglis House Gardens: 16 credits + 16 bonus credits

Elmwood Road

Status: Completed

Inglis House is a 100% affordable rental project consisting of 16 low income units for adults with physical disabilities that was constructed under HUD’s Section 811 program. All of the units are one-bedroom units. Affordability controls for 40 years starting in 2003 are in place.

The Township will claim 16 credits and 16 rental bonus credits for a total of 32 credits from this project.

Project information and HUD Capital Funding Agreement can be found in Appendix H.1

AGE RESTRICTED RENTAL

Elmwood House: 69 credits + 11 rental bonus credits

Block 15.03, Lot 170

444 Elmwood Road

Status: Completed

The Elmwood House project is a 100% affordable senior rental that was developed by B’Nai Brith, and originally received approvals in 1996. The initial approval allowed for construction of 74 units, and a second phase of the project for 15 additional units was completed in 2002. Within the 89 unit project, all units are one-bedroom units that are reserved for low-income seniors.

The 89 credits available from this project are being split between the Prior Rounds and the Third Round, with 69 credits being claimed in the Prior Rounds, and the remaining 20 credits being claimed in the Third Round. As these are rental units, 11 age-restricted rental bonus credits are also being claimed in the Prior Round.

A monitoring report with information on the income and bedroom distribution for all Prior Round rental and for sale projects can be found in Appendix G.

SUPPORTIVE AND SPECIAL NEEDS HOUSING

Oaks Integrated Care / Family Services: 3 credits + 3 rental bonus credits

Block 20.07, Lot 19

52 North Maple

Status: Completed

This facility operated by Oaks Integrated Care was also initially run by Family Services prior to Oaks. The facility is a 3-bedroom group home. The Township will claim 3 credits from this project, as well as 3 rental bonus credits.

A copy of the license, survey, and other documentation for this facility can be found in Appendix I.1.

Bancroft: 4 credits + 4 rental bonus credits

Block 51.04, Lot 46

28 South Elizabeth Court

Status: Completed

Bancroft Neurohealth operates several group homes throughout the Township. Their facility at 28 South Elizabeth includes 4 bedrooms that are available to clients. The Township will claim 4 credits from this group home, as well as 4 additional rental bonus credits.

A copy of the license, survey, and other documentation for this facility can be found in Appendix I.3.

Bancroft: 4 credits + 4 rental bonus credits

Block 32.13, Lot 4

8 Elmgate Road

Status: Completed

Bancroft operates another facility that they own at 8 Elmgate Road that contains 4 bedrooms that are available to clients. The Township will claim 4 credits of special needs housing from this facility, and 4 rental bonus credits.

A copy of the license, survey, and other documentation for this facility can be found in Appendix I.4.

Community Options: 4 credits + 4 rental bonus credits

Block 11.04, Lot 108

102 Greenbrook Drive

Status: Completed

Community Options Inc, owns and operates a 4-bedroom group home facility at 102 Greenbrook Drive. This facility was established in 1996 with 20 year affordability controls. The Township will claim 4 credits as well as 4 rental bonuses from this group home facility.

A copy of the license, survey, and other documentation for this facility can be found in Appendix I.5.

Community Options: 4 credits + 4 rental bonus credits

Block 13.20, Lot 30

35 Hanover Street

Status: Completed

Community Options Inc also owns and operates a 4-bedroom group home on Hanover Street. This facility began operations in 1997 with a 20 year term for affordability controls. Those controls were renewed by a further 20 years in 2017.

A copy of the license, survey, and lien renewal for this facility can be found in Appendix I.6.

Community Options: 4 credits + 4 rental bonus credits

Block 117, Lot 6.01

38 Fourth Street

Status: Completed

Community Options owns and operates an additional group home facility on Fourth Street that has 4 bedrooms available to clients. This facility has a 30 year deed restriction that was put in place in 2018. The Township will claim 4 credits as well as 4 rental bonus credits through this project.

A copy of the license and deed restriction for this project can be found in Appendix I.7.

Community Options: 4 credits + 4 rental bonus credits

Block 12, Lot 6.09

83 North Locust Avenue

Status: Completed

A 4-bedroom group home on North Locust Avenue is owned and operated by Community Options Inc. The facility has 30 year affordability controls that were put in place in 2018. The Township will claim 4 rental credits as well as 4 bonus credits from this project.

A copy of the license and other documentation for this project can be found in Appendix I.8.

Quality Management Associates (QMA): 4 credits + 4 rental bonus credits

Block 35.03, Lot 5

15 Evans Road

Status: Completed

Quality Management Associates owns and operates a 6 bedroom facility on Evans Road. The facility had 20 year affordability controls that were put in place in 1993. Although the facility has 6 bedrooms and QMA is licensed to support 5 individuals at this home, they currently only use 4 bedrooms for clients. As such, the Township will claim 4 credits as well as 4 rental bonus credits from this project.

A copy of the license and other documentation for this project can be found in Appendix I.9.

Quality Management Associates (QMA): 4 credits + 4 rental bonus credits

Block 35.01, Lot 14

28 Pelham

Status: Completed

Quality Management Associates also owns and operates a facility on Pelham Road. This licensed group home has 4 bedrooms that are available to clients. The facility has 20 year affordability controls that were established in 1997. The Township will claim 4 credits and 4 rental bonus credits from this group home.

A copy of the license and other documentation for this project can be found in Appendix I.10.

Durand Academy: 4 credits + 4 rental bonus credits

Block 24.24, Lot 48

38 Hawk Lane

Status: Completed

Durand Academy operates a group home on Hawk Lane. The home has 20 year affordability controls that were initially established in 1996, but with a renewable subsidy. The Township will claim 4 credits and 4 rental bonus credits from this group home.

A copy of the license and other documentation for this project can be found in Appendix I.11.

Third Round Obligation

All of the sites and projects included in Evesham Township’s Fair Share Plan are located within the approved sewer service areas and are within Planning Areas 1 and 2 on the State Plan Map. Though 55% of Evesham’s land area is within the Pinelands National Reserve, the Township has created a compliance plan that does not rely on the environmentally sensitive Pinelands area for any new development at this time.

The parameters below are based on the Township’s Third Round fair share obligation of 680 units under the Settlement Agreement, which includes the “gap present need” (1999 to 2015) and the “prospective need” (2015-2025). Since the Township is eligible for 170 rental bonus credits, the minimum number of “actual” units is 510 if all bonuses are utilized. This compliance plan includes 537 “actual” units, as well as the maximum of 170 rental bonus credits being claimed.

The Township must meet the following minimum and maximum requirements in addressing the 680 total unit obligation:

- **Low/Moderate Income Split:** at least fifty percent (50%) of the units addressing the Third Round Prospective Need shall be affordable to very-low-income and low-income households with the remainder affordable to moderate-income households.
 - $510 \times 0.5 = 255$
 - A minimum of 255 units must be affordable to low income households.
- **Very Low Income Units:** Thirteen percent (13%) of all affordable units referenced in the Settlement Agreement, except for those units constructed or approved prior to July 1, 2008, shall be affordable for very low income households, with half of the very-low-income units being available to families.
 - The Township has an obligation to provide at least 50 units for very-low-income households, with at least 25 of those units being available to families.
- **Rental Units:** At least twenty-five percent (25%) of the Third Round Prospective Need shall be met through rental units, including at least half in non-age-restricted rental units available to families.
 - $680 \times 0.25 = 170$
 - A minimum of 170 units must be rental units, and at least 85 of those units must be non-age-restricted units that are available to families.
- **Age Restricted Units:** A maximum of 25 percent (25%) of the Township’s credits can be from age-restricted senior units.
 - $680 \times 0.25 = 170$

- The Township may claim a maximum of 170 credits from senior units.
- **Family Units:** A minimum of fifty percent (50%) of the units addressing the Third Round Obligation must be non-age restricted affordable units available to families.
 - $510 \times 0.5 = 255$
 - A minimum of 255 units must be available to families.
- **Rental Bonus Credits:** The Township may claim bonus credits for rental units in accordance with N.J.A.C. 5:93-5.15(d), which states that a municipality shall receive two units (2.0) of credit for rental units available to the public, but no rental bonuses shall be granted for rental units in excess of the rental obligation. A municipality shall receive one and one-third 1.33 units of credit for age restricted rental units. However no more than 50 percent of the rental obligation shall receive a bonus for age restricted rental units. The rental bonus claimed shall not exceed the minimum rental obligation.
 - $680 \times 0.25 = 170$
 - The Township may claim bonus credits for rental units up to 170 bonus credit units. This may be either through 2.0 credits for family rental units, or 1.33 credits for age-restricted rental units, provided that no more than 50 percent of the rental obligation is met through age-restricted units.

Third Round Compliance Mechanisms

The Township proposes to satisfy its 680 unit Third Round obligation through the following mechanisms:

Third Round Credits				
Project	Type of Unit	Units	Bonus	Total
Elmwood House	Age Restricted Rental	20	0	20
Mend / Conifer Sharp Road	Family Rental	104	78	182
Habitat for Humanity	Family for Sale	1	0	1
Habitat for Humanity	Family for Sale	2	0	2
Cornerstone at Marlton	Family Rental	64	64	128
Evesham Senior / Walters	Age Restricted Rental	68	0	68
Hawthorne / Evesham Retirement	Age Restricted Rental	24	0	24
Brightview	Senior	27	0	27
Artis Senior	Senior Rental	6	0	6
Capitol Senior / Marlton Executive	Senior	11	0	11
Oakleigh	Rental	10	0	10
CareOne	Rental	4	0	4
M2A New Road / Tamburro	Rental	3	0	3
M2A Proposed		19	0	19
Fieldstone / Barclay	Family Rental	33	28	61
Renaissance Square / Tri Towne	Family Rental	34	0	34
Harvest House	Family Rental	8	0	8
Winding Brook / Krysta	Family for Sale	6	0	6
Berkshire Woods / Timber Ridge	Family for Sale	6	0	6
DPW Yard	Family Rental	16	0	16
Extension of Controls	Family	8	0	8
Group Homes				
Allies Inc – Overington	Special Needs	4	0	4
Allies Inc – Radnor	Special Needs	4	0	4
Bancroft – 5002 Red Haven	Special Needs	3	0	3
Bancroft – 106 Harvest	Special Needs	3	0	3
Bancroft – 1505 Roberts Lane	Special Needs	3	0	3
Bancroft – 1506 Roberts Lane	Special Needs	3	0	3
Bancroft – 46 East Cedar	Special Needs	4	0	4
Bancroft – 3301 Elberta	Special Needs	3	0	3
Bancroft – 5 Tenby Lane	Special Needs	4	0	4
Oaks – Gaylord	Special Needs	3	0	3

Third Round Credits				
Project	Type of Unit	Units	Bonus	Total
Oaks – 100 Barn	Special Needs	4	0	4
Oaks – 100A Barn	Special Needs	3	0	3
Oaks – Chestnut	Special Needs	4	0	4
Oaks – Kettle Run	Special Needs	4	0	4
QMA - N Elmwood	Special Needs	3	0	3
QMA - Laurel	Special Needs	3	0	3
Community Options - Carlton	Special Needs	4	0	4
Community Options - Longhurst	Special Needs	3	0	3
OTC Longhurst	Special Needs	4	0	4
OTC Concord	Special Needs	4	0	4
Overall Totals		544	170	714

FAMILY RENTAL PROJECTS

MEND / Conifer Sharp Road: 104 credits + 78 rental bonus credits

Block 14, Lot 2

200 Sharp Road / 1 Seneca Court (AH-3 District)

49.2 acres

Status: Completed

This 100% Affordable Family Rental project consists of one, two, and three-bedroom apartments available to low- and moderate-income households. The 49.16-acre property is located on the east side of Sharp Road, just south of Church Road. The site was determined to be suitable and was awarded Low Income Housing Tax Credits by the NJHMFA in 2007. Evesham Township purchased the land and later sold it to the affordable housing developer for one dollar, and also provided AHTF monies in support of the extension of utilities to the site. The Township entered into an Affordable Housing Agreement with Moorestown Ecumenical Neighborhood Development, Inc. (MEND) on May 19, 2006. The AH-3 zoning standards (section 160-66.1) were adopted by ordinance 2-2-2007 on February 6, 2007 in order to provide suitable standards and requirements for the 100% affordable housing development as had been recommended in the 2005 Housing Element and 2006 Master Plan. The developer (MEND) received preliminary site plan approval on March 15, 2007 and final site plan approval on September 20, 2007. There are freshwater wetlands on the property, but two significant upland areas were targeted for development. Water and sewer service were extended to the site and improvements were made to Sharp Road. The project received its final Certificate of Occupancy in 2009.

The project includes 16 (15.4%) one bedroom units, 56 (53.8%) two bedroom units and 32 (30.7%) three bedroom units. The site is owned by Sharp Road, LLC and managed by MEND in conjunction with Conifer Realty, LLC in accordance with UHAC. The income distribution for the site is set forth in the table below. The site was awarded the NJ Governor's "Excellence in Affordable Housing Development" Award. The affordability restriction is included as Appendix J.1.

	1 bedroom	2 bedroom	3 bedroom	Total	Percent
35% AMI UHAC Very Low	2	6	3	11	11%
50% AMI Low	11	41	25	77	74%
60% AMI Moderate	3	9	4	16	15%
Totals	16	56	32	104	100%

**Walters Group / Evesham Family Apartments / Cornerstone at Marlton: 64 credits + 64 bonus credits
Block 36, Lot 2.03**

4 Executive Drive (WFAR Workforce Affordable Residential District)

8.7 acres

Status: Completed

Cornerstone at Marlton is a recently completed 100% affordable rental community consisting of one, two, and three-bedroom apartments available to low and moderate income households. The 8.7-acre property is currently vacant and is located on the west side of Executive Drive. Executive Drive is a private road that connects Evesham Road (north of the site) to Route 73 (east of the site). The property was formerly in the C-1 commercial zoning district, but was rezoned in 2018 to enable the proposed affordable housing development. The WFAR zone standards provide an opportunity for needed housing that is affordable to low and moderate income households and facilitated the establishment of an affordable rental community in an area that has access to existing infrastructure and is in close proximity to transportation, jobs, recreation, services, and shopping. The site is surrounded to the north, east, and south by properties in the C-1 Commercial zone, and to the west by properties in the MD residential district. The surrounding uses include office buildings, vacant land, and single-family homes.

The developer received preliminary and final site plan approval on June 21, 2018, was awarded tax credit financing in November 2018, purchased the lot, and began construction in 2019. The development includes 12 one-bedroom, 36 two-bedroom, and 16 three-bedroom units, and provides 32 low income units (including 8 very-low income) and 32 moderate income units.

Evesham Family Apartments Urban Renewal LLC and Evesham Township entered into an Affordable Housing Agreement on June 19, 2018 to outline the obligations and expectations for the project and to provide that the Township will provide a subsidy from the Affordable Housing Trust Fund to support the project, in exchange for a 45-year affordability deed restriction. The Township adopted an ordinance authorizing a Financial Agreement for tax abatement and a payment in lieu of taxes for a 30-year period following the issuance of a certificate of occupancy for the 100% affordable housing project.

A HOME deed restriction on the property also requires that at least 5 units be set aside for families currently at risk of experiencing homelessness, and a memorandum of understanding between the developer and a service provider (Servicios) indicates that Servicios will administer these 5 units as very low income family units.

A copy of the NJMHFA award, a resolution of need for the project, an ordinance authorizing Township funding for the project, the HOME deed restriction, and a copy of the MOU can be found in Appendix J.4, in addition to the Certificate of Occupancy for the building.

The unit distribution for the Cornerstone at Marlton / Evesham Family Apartments site is as follows.

	1 bedroom	2 bedroom	3 bedroom	Total	Percent
30% AMI	5	2	1	8	13%

Very Low					
50% AMI Low	1	16	7	24	37%
60% AMI Moderate	6	18	8	32	50%
Totals	12	36	16	64	100%

Renaissance Square / Tri-Towne Plaza: 34 credits
Block 27.02, Lots 2.03, 2.04, 2.05, 2.08, 2.09
101 Route 70 East (C-1 District and Tri-Towne Redevelopment)
20.9 acres
Status: Completed

The Residences at Renaissance Square is part of a mixed-use redevelopment project on the site of the former Tri-Towne Plaza. The site is located on the south side of Route 70 between Locust Avenue and Plymouth Drive and was designated as an area in need of redevelopment in 2013. A Redevelopment Plan was adopted in December 2013 and was amended in June 2015. The site was approved for retail, service, restaurant, office and residential development. The residential component of the project is now completed. The residential component consists of 338 total units, with 34 affordable units. The residential buildings were occupied in 2020 and the remaining non-residential buildings are under construction. There are five residential buildings on site, and each contains some affordable units. The 30-year affordability restriction has been filed. The residential portion of the Redevelopment project is subject to a 20-year Financial Agreement (PILOT) with the Township. The affordable units are being administered by the Township’s Administrative Agent (CGP&H). A copy of the affordability restriction is included as Appendix J.14

	1 bedroom	2 bedroom	3 bedroom	Total	Percent
30% AMI Very Low	3	2	0	5	14.7%
50% AMI Low	0	9	4	13	38.2%
60% AMI Moderate	3	10	3	16	47%
Totals	6	21	7	34	100%

Barclay Chase / Fieldstone: 33 credits + 28 rental bonus credits
Block 16, Lot 1.06
880 – 890 Route 70 East (C-1 District and Aristone Redevelopment)
20.5 acres
Status: Completed

Barclay Chase is an inclusionary mixed-use development within a designated redevelopment area on the north side of Route 70 adjacent to the Medford Township border. The properties, known as the Aristone Tract, were vacant, falling into disrepair, and were the subject of a complicated ownership structure with different family members controlling different lots. A Redevelopment Plan was adopted for the area in 2014. The Redevelopment Plan was subsequently amended in 2017 to enable the inclusion of additional affordable units. The development is now complete and includes 271 residential units in seven buildings, 6,000 square feet of commercial space, a clubhouse, and outdoor amenity areas. The property is subject to a 20-year financial agreement (PILOT) with the Township.

The affordable units are compliant with COAH regulations and UHAC requirements. The affordable units are administered by Barclay Chase’s certified in-house administrative agents. The affordability restriction is included as Appendix J.13. The unit breakdown is as follows.

	1 bedroom	2 bedroom	3 bedroom	Total	Percent
30% AMI Very Low	1	4	0	5	15%
50% AMI Low	2	6	4	12	36%
60% AMI Moderate	3	10	3	16	49%
Totals	6	20	7	33	100%

***Department of Public Works (DPW) Yard / Barclay Chase II: 16 credits
Block 16, Lot 1.03
501 Evesboro – Medford Road (C-1 District and Redevelopment Area)
5.4 acres
Status: Proposed***

The Township’s Department of Public Works offices and yard has been located at 501 Evesboro-Medford Road for approximately 25 years and has outgrown the facility. In 2016 the Township purchased the property at 100 Sharp Road (located across the street from the current facility) with the intent of making some needed site improvements and building additions and then moving the Department of Public Works (DPW) to this site. There is a contract purchaser waiting for the DPW to vacate the site. The site is located on Evesboro-Medford Road at the terminus of Sharp Road and is surrounded on three sides by the Barclay Chase at Marlton development described above.

The DPW site was designated as an Area in Need of Redevelopment by Resolution 179-2016 on June 21, 2016. The “Aristone Tract” Redevelopment Plan; which enabled the Barclay Chase development, has been amended to include the DPW property and to provide standards applicable to the site. The amended Redevelopment Plan was adopted on August 20, 2019 by Ordinance 14-8-2019, included in Appendix J.18. Fieldstone Associates, LP was designated as the redeveloper of the DPW site on July 14, 2020. Fieldstone formed Barclay Chase at Marlton II Urban Renewal LLC to redevelop the

property. The Township entered into a Redevelopment Purchase and Sale Agreement with the urban renewal entity on October 6, 2020. The redevelopment of the site will be complementary to the existing Barclay Chase development, with shared access and interconnected vehicular and pedestrian pathways. The Redevelopment Plan and the Redevelopment Agreement require a 15% affordable housing set aside in accordance with COAH rules, UHAC, and the Township’s affordable housing ordinance. The Redevelopment Purchase and Sale Agreement, as well as an environmental report, and survey of the property are included as well in Appendix J.18.

	1 bedroom	2 bedroom	3 bedroom	Total	Percent
30% AMI Very Low	1	1	1	3	19%
50% AMI Low	1	3	1	5	31%
60% AMI Moderate	1	5	2	8	50%
Totals	3	9	4	16	100%

Harvest House Mansion: 8 credits
Block 4.09, Lot 15.01
52 East Main Street
1.37 acres
Status: Completed

The Harvest House Redevelopment project is located within the downtown Marlton area, where the Township encourages redevelopment and revitalization that will contribute to the establishment of a more vibrant downtown with a variety of uses and activities. A Redevelopment Plan for the site was first adopted in 2014 and was amended in July 2018. The Harvest House Mansion is the name of the furniture store that occupied the site from the 1970s through 2016. The historic portion of the house, known as the Stokes-Evans House, is on the National and State register of historic places and is architecturally intact. The main building also includes a building addition that was constructed in the 1970s. The property is large by downtown standards. Though the furniture and antiques store and a residence have been the primary uses at the site for decades, the site has been under-used for many years. The Township and the redeveloper coordinated to enable the historic portion of the Stokes-Evans House to be moved closer to East Main Street in order to preserve the building and to improve the streetscape, while creating a larger development area on the northern side of the property.

The interior of the historic structure has been renovated and a four-story residential building is being constructed behind it. Fifteen percent (15%) of the residential units will be affordable to low- and moderate-income households. The preliminary and final site plan were approved by the planning board on August 16, 2018 (resolution PB17-04Site). The redeveloper and the Township have entered into an affordable housing agreement and a financial agreement (20-year PILOT) to ensure the financial viability of the project. The project recently received a certificate of occupancy

in October of 2021. The Township provided a contribution from the Affordable Housing Trust Fund to support the challenging project. The affordability restriction and a copy of the c/o is included in Appendix J.15.

	1 bedroom	2 bedroom	3 bedroom	Total	Percent
30% AMI Very Low	0	1	0	1	12.5%
50% AMI Low	1	2	1	4	50%
60% AMI Moderate	0	2	1	3	37.5%
Totals	1	5	2	8	100%

FAMILY FOR SALE

Winding Brook / Krysta / JP Orleans: 6 credits

Block 14.03, Lots 1-42, 69;

Block 14.04, Lots 1-27

170 Sharp Road (Industrial Park District)

28.4 acres

Status: Completed

Winding Brook is an attached single family (townhouse) community located on the east side of Sharp Road, just south of the Sharp Road Apartments (MEND) site. Until a few years ago, the properties along Sharp Road had been in the IP Industrial zone as had been recommended in the 1990 Master Plan. In 1990 there was no sewer service to the area and the area had remained rural with a few light industrial-type uses toward the southern end. As sewer capacity became available and interest in residential development continued in the developable non-Pinelands portions of the Township, land use along and around Sharp Road has evolved to include several residential developments. In 2014 a use variance was granted to allow this site to be developed with single family attached homes generally following the Moderate Density Residential (MDR) overlay standards in the Township Code (section 160-63.1).

The site plan and subdivision were approved on April 20, 2015 (resolution ZB13-19) and amended approval was granted on May 2, 2016 (resolution ZB13-19A) The development is now complete and includes a total of 66 for-sale townhouse units, of which 6 are affordable to low and moderate income households. The affordable units are being administered by the Township’s Administrative Agent (CGP&H). The affordability restriction was executed on September 8, 2020 and is included as Appendix J.16.

	1 bedroom	2 bedroom	3 bedroom	Total	Percent
30% AMI Very Low	0	0	0	0	0%

50% AMI Low	0	1	2	3	50%
60% AMI Moderate	0	1	2	3	50%
Totals	0	2	4	6	100%

Berkshire Woods / Timber Ridge / DR Horton: 6 credits

Block 15.20, Lots 1-64

North Elmwood Road (LD District)

28.5 acres

Status: Completed

Berkshire Woods is an attached single family (townhouse) community located on the east side of North Elmwood Road. The site is within the LD zoning district and the MDR (moderate density residential) Overlay. The MDR zoning standards were adopted in 2011 at a time when there was uncertainty about municipal fair share obligations and the COAH regulations. The standards were intended to allow increased flexibility in the type of housing permitted in the portions of the Low Density LD zoning district that had access to water and sewer service and where cluster development would be beneficial; while acknowledging environmental constraints and creating a realistic opportunity for the inclusion of affordable units as part of market rate housing development.

The Berkshire Woods townhouse development is similar in tract area and residential density to the Winding Brook development. Approximately half the site is subject to a conservation easement as a result of an endangered bat that was discovered on the wooded portion of the site during site design. The development includes a total of 68 for-sale townhouse residential units, of which 6 are affordable to low and moderate income households. The subdivision was approved by the Planning Board on October 20, 2016 (resolution PB16-13). The subdivision and development plan complied with the applicable zoning requirements. However, in January of 2017 Fair Share Housing Center appealed the Planning Board’s approval of the development, asserting that the approval thwarted Evesham’s ability to comply with its fair share housing obligations. Ultimately, in order to persuade FSHC to release Timber Ridge at North Elmwood from the litigation, which was causing costly delays, the developer agreed to make a \$140,000 payment to Evesham’s Affordable Housing Trust Fund in addition to the six (6) new affordable units that were already part of the approval (and required by the zoning). The Agreement was memorialized by Timber Ridge, the Township, and Fair Share Housing Center in September 2017 and is included in Appendix J.17.

The affordability restriction for each of the six (6) units is filed at the time of closing on each affordable unit. The home builder, DR Horton, has contracted with the Township’s Administrative Agent to market and administer the sale of the affordable units. All of the units are now occupied. The declaration of deed restriction for the six affordable units is included in Appendix J.17.

	1 bedroom	2 bedroom	3 bedroom	Total	Percent
30% AMI Very Low	0	0	0	0	0%
50% AMI Low	0	1	2	3	50%
60% AMI Moderate	0	2	1	3	50%
Totals	0	3	3	6	100%

Habitat for Humanity: 2 credits
Block 4.08, Lots 5 and 6
36 and 38 Oak Avenue
0.25 acres
Status: Proposed

This 100% Affordable Family for Sale project to be developed by Habitat for Humanity was initially proposed to be developed on Township owned lands on Evesboro-Medford Road. The Township and Habitat for Humanity reached an agreement in June of 2019 to allow for the development of 4 affordable for sale homes on the Township owned lot. Title to the property was transferred to Habitat from the Township, however after assuming title and conducting investigations into the property, Habitat determined that development on that lot would be unfeasible. As a result, the agreement has been amended to require that Habitat construct two (2) affordable units on Township owned properties at 36 and 38 Oak Avenue. As a part of the agreement, the Township will pay Habitat \$45,000 for each unit, and in exchange Habitat will construct the two homes and provide affordable deed restrictions of at least 30 years on each home.

In July of 2021, the Planning Board approved of a lot line adjustment between the two properties that will allow for the construction of the two affordable homes on the properties. It is anticipated that Habitat for Humanity will be submitting plans for construction of the homes in the fall of 2021 or in early 2022. A copy of the amended agreement between Evesham Township and Habitat for Humanity, the approved subdivision, and the conceptual site plan for two affordable homes on the site can be found in Appendix J.3.

	1 bedroom	2 bedroom	3 bedroom	Total	Percent
30% AMI Very Low	0	0	0	0	0%
50% AMI Low	0	1	0	1	50%
60% AMI Moderate	0	1	0	1	50%
Totals	0	2	0	2	100%

Habitat for Humanity: 1 credit

Block 28.11, Lot 2

10 Radnor Avenue (MD District)

0.25 acres

Status: Complete

Habitat for Humanity (Habitat) acquired this residential lot in 2016 and demolished the dilapidated structure. The lot is located in the Heritage Village neighborhood. The property is surrounded by other similar single family lots and a municipal recreation facility to the east. A former single family dwelling on the site was demolished and Habitat has constructed a new home for a low income family. The Township and Habitat entered into an Affordable Housing Agreement on July 20, 2017 setting forth the details of the project and providing that Evesham will contribute \$35,000 to the home for a moderate income household or \$45,000 for a low income household. The new affordable home is complete and occupied. Habitat has coordinated with the Township’s Administrative Agent to ensure that the selection and income qualification process were consistent with the UHAC requirements. The Affordable Housing Agreement is included as Appendix J.2. The unit is subject to a 30-year affordability restriction; which was filed at the time of closing.

A copy of the deed restriction can be also be found in Appendix J.2.

	1 bedroom	2 bedroom	3 bedroom	Total	Percent
30% AMI Very Low	0	0	0	0	0%
50% AMI Low	0	0	1	1	0%
60% AMI Moderate	0	0	0	0	100%
Totals	0	0	1	1	100%

SENIOR RENTAL

Brightview at Evesham: 27 credits

Block 2.01, Lot 8.01

170 Greentree Road (C-2 District)

10.6 acres

Status: Phase I Complete / Use Variance Approved for Phase II

Shelter Development Group received a use variance, density, and floor area ratio variances to permit a 201-unit continuing care facility on the 10.64-acre site in 2007. When complete, the overall facility would include 121 independent living units (157 beds), 57 assisted living units (64 beds), and 23 Alzheimer’s units (25 beds). Phase I of the facility includes 171 of the total 201 units and opened in 2011. Phase I consists of 91 independent living units, and 80 assisted living units (57) and

Alzheimer’s units (23). A total of 17 of the existing units are set aside for low and moderate income individuals and an additional 6 independent living units were initially considered part of phase II.

In March of 2021, the developer received an amended use variance approval for an expansion of the facility that included the 6 independent living units originally scheduled as part of phase II but not constructed, and an additional 4 affordable units for a total of 10 affordable units in phase II. With the 17 existing units this will bring the total of affordable senior rental units to 27 at this property. In total the amended approval allows for 303 assisted living units with 384 beds in the facility. Although the developer has been granted an amended use variance approval, the applicant at the time elected to bifurcate the application and a formal site plan application has yet to be approved. It is anticipated that the site plan drawings will be submitted to the Township in the fall of 2021.

The amended resolution of approval indicates that at least 50% of the affordable units will be reserved for low income residents, and that at least 10% or 9 units will be very low income units reserved for Medicaid eligible residents.

An assisted living residence is a facility licensed by the New Jersey Department of Health and Senior Services to provide apartment-style housing and congregate dining and provides assisted living services to the residents. A congregate independent living facility provides all of the same services with the exception of medical treatment. The unit of credit within the assisted living/ congregate independent living facilities is the suite or apartment. However, a two- bedroom apartment shall be eligible for two units of credit if it is restricted to two unrelated individuals.

The fees paid by the residents of both the assisted living units and the independent living units include rent, utilities, apartment/grounds maintenance, real estate taxes, two meals per day, bi-weekly housekeeping, 24-hour emergency response service, structured activities, and transportation. The affordable units are being administered in coordination with the Township’s Administrative Agent.

The operator anticipates that the Phase II units will be constructed by early 2023. A new deed restriction will be provided for the second phase and the new units once construction is complete and a certificate of occupancy has been issued.

The deed restriction for the existing independent living units at Brightview at Evesham, and the Zoning Board Resolutions of Approval for the original use variance and site plan, and the amended use variance, ZB 21-01 are included in Appendix J.7.

	1 bedroom	2 bedroom	3 bedroom	Total	Percent
30% AMI Very Low	9	0	0	9	33%
50% AMI Low	5	0	0	5	18%
60% AMI Moderate	13	0	0	13	49%
Totals	27	0	0	27	100%

Walters / Evesham Senior: 58 credits

Block 2.06, Lot 2

16 Stow Road (SEN 3 Senior Residential District)

2.3 acres

Status: Completed

Evesham Senior Apartments will be a 100% affordable age-restricted rental community consisting of one and two bedroom apartments available to low and moderate income senior citizens. The 2.31-acre property located on the east side of Stow Road is currently vacant. The surrounding area is within the IP Light Industrial Park zone, though the uses are primarily office and warehouse with some commercial recreation. The property was formerly in the IP zoning district, but was rezoned in 2018 to enable the new age-restricted affordable housing development. The purpose of the SEN-3 zone is to provide an opportunity for needed age-restricted affordable apartments on an infill site in a manner that is compatible with surrounding development and in an area that has existing infrastructure and is in close proximity to transportation, recreation, shopping, and services.

The Evesham Senior Apartments LLC purchased the lot in 2017 and received preliminary and final site plan approval from the Evesham Township Planning Board on June 21, 2018. The developer subsequently filed an application with NJHMFA for low income housing tax credits to assist in funding the project, received the award notification in November 2018. The award notification letter is included in Appendix J.5. The building includes first level parking and four stories of apartments. At least 34 of the units are available to low income households (including 9 very-low income) and the remainder are available to moderate income households. The Township adopted a Resolution of Need for the project, which is included in Appendix J.5.

Evesham Senior Apartments LLC and Evesham Township entered into an Affordable Housing Agreement on September 7, 2018 to outline the obligation and expectations for the project and to provide that the Township will provide a subsidy from the Affordable Housing Trust Fund to support the project, in exchange for a 30-year affordability deed restriction. The Resolution authorizing expenditure for the project is included in Appendix J.5. The Township and the developer entered into a Financial Agreement for tax abatement and a payment in lieu of taxes for the term of the HMFA Mortgage, also included in Appendix J.5. The project was completed and issued a certificate of occupancy in June of 2021.

	1 bedroom	2 bedroom	3 bedroom	Total	Percent
30% AMI Very Low	8	1	0	9	13%
50% AMI Low	23	2	0	25	37%
60% AMI Moderate	32	2	0	34	50%
Totals	63	5	0	68	100%

Elmwood House: 20 credits (69 credits in Prior Round)

Block 15.03, Lot 170

444 Elmwood Road

3.75 acres

Status: Complete

The Elmwood House project is a 100% affordable senior rental that was developed by B’Nai Brith, and originally received approvals in 1996. The initial approval allowed for construction of 74 units, and a second phase of the project for 15 additional units was completed in 2002. Within the 89 unit project, all units are one-bedroom units that are reserved for low income seniors.

The 89 credits available from this project are being split between the Prior Round and the Third Round, with 69 credits being claimed in the Prior Round, and the remaining 20 credits being claimed in the Third Round. As these are rental units, 11 bonus credits are also being claimed in the Prior Round.

Crediting documentation for this project can be found in Appendix H.4

	1 bedroom	2 bedroom	3 bedroom	Total	Percent
30% AMI Very Low	0	0	0	0	0%
50% AMI Low	89	0	0	89	100%
60% AMI Moderate	0	0	0	0	0%
Totals	89	0	0	89	100%

ASSISTED LIVING / SENIOR RENTAL

Hawthorn / Evesham Retirement: 24 credits

Block 24.24, Lot 2

405 Lippincott Drive (AH-1A District)

5.5 acres

Status: Approved / Under Construction

Hawthorn Retirement Group has received approval to develop the site with a congregate independent living facility that will include 161 suites and a total of 177 beds (16 two-bed units) with a 15% affordable housing set aside. The 5.52-acre property is located on the west side of Lippincott Drive within the AH-1A zoning district. The site was considered for inclusionary development in the 1999 Fair Share Plan and was more specifically included in the 2006 Master Plan. Revisions to the AH-1A zoning district were adopted on June 19, 2007 (Ordinance 10-6-2007) to enable the development of an inclusionary continuing care facility. The zoning had been agreed to by the property owner, developer and Township at the time. Minor adjustments were made to the ordinance on June 23, 2009 (Ord10-6-2009), and a site plan was approved by the Planning Board in

2009. The previously approved plan was for a 2 and 3-story building that would include a total of 150 beds, of which 32 would be affordable. Years of unsuccessful efforts to bring the project to fruition have demonstrated that the 21% affordable housing set aside was too high for this type of facility and rendered the project financially infeasible.

The revised zoning allows more flexibility as to the types of age-restricted units permitted and will allow a four-story building with a more compact footprint and more efficient floor plan.

The recorded deed restriction for this project is included in Appendix J.6.

The unit distribution for the site is as follows. All units are studio units.

	1 bedroom	2 bedroom	3 bedroom	Total	Percent
30% AMI Very Low	4	0	0	4	17%
50% AMI Low	8	0	0	8	33%
60% AMI Moderate	12	0	0	12	50%
Totals	24	0	0	24	100%

Capitol Senior Housing at Marlton Executive: 11 credits

Block 36, Lot 2.05

5 Executive Drive

6.1 acres

Status: Under Construction

The properties within “Marlton Executive Campus” along Executive Drive (a private roadway connecting Route 73 and Evesham Road) were the subject of site plan approvals granted in 2001 to permit the construction of five office buildings. Only two of the buildings were constructed (now on lot 2.01). Some site improvements had been constructed on the remaining lots including the private roadway, stormwater infrastructure, and parking areas, but the lots had remained vacant. The lots are within a commercial zoning district, and though there is frontage on Route 73 and Evesham Road, freshwater wetlands and wooded areas constrained visibility and limited the potential for traditional retail or service development. In considering options for fair share compliance and looking at the overall availability of developable land with access to water and sewer infrastructure, transportation infrastructure, and proximity to employment and services, and through site suitability analysis, it was determined that the vacant lots presented an opportunity to redefine the area from commercial to residential. Through negotiations with the property owner, it was determined that lot 2.03 could be developed with the 100% affordable rental development now known as Cornerstone at Marlton or Evesham Family Apartments. The remaining lots would be considered for designation as an Area in Need of Redevelopment in order to set the stage for development of the properties with uses not contemplated by the C-1 zoning. The sites have

developable land area, but are not ideally configured for retail development, and office development has proven unlikely.

The area was designated as a Non-condemnation Area in Need of Redevelopment by resolution 127-2019, and a Redevelopment Plan was prepared and adopted on November 12, 2019 by ordinance 18-11-2019. The Redevelopment Plan enables lots 2.04 and 2.05 to be developed with a range of age-restricted housing types. For assisted living and memory care, a minimum of 10 of the total beds are required to be affordable to Medicaid eligible residents in accordance with the site plan approval, and an additional 11th unit must be reserved for low income residents. For the multi-family age restricted units being constructed, the Redeveloper’s Agreement requires a payment in lieu for 15% of the total number of units produced. The payment in lieu will ensure that there is adequate money in Affordable Housing Trust Fund to fund the programs outlined in the Spending Plan, including the Market to Affordable Program; which will assist in creating affordable units from the existing housing stock. There has not yet been a proposal for the multi-family age restricted portion of the redevelopment area.

Capitol Seniors Housing (CSH Marlton LLC) is has purchased the site and has been designated as the redeveloper for lot 2.05 in block 36 in accordance with Resolution 122-2020 adopted on March 3, 2020. On May 11, 2020 the Township and the Redeveloper entered into a Redevelopment Agreement; which requires at section 7(q) on page 19 that the project will include 11 beds affordable to very low, low, and moderate income households and that the affordable beds will be restricted for a period of 30 years and will comply with all applicable requirements of UHAC, the Redevelopment Plan, and other applicable laws. These 11 credits will come in the form of 10 Medicaid beds, and one additional income restricted unit. The Redeveloper received preliminary and final site plan approval on June 18, 2020 in accordance with Resolution PB20-02. The project is currently under construction. The affordability restriction will be required to be filed prior to the issuance of a Certificate of Occupancy. The units will be administered by the redeveloper together with the Township’s Administrative Agent.

Once the project is constructed and receives a certificate of occupancy, a deed restriction will be recorded.

A copy of the Redeveloper’s Agreement, the Resolution of Approval of the site plan, and a draft deed restriction for this project are included in Appendix J.9.

	1 bedroom	2 bedroom	3 bedroom	Total	Percent
30% AMI Very Low	11	0	0	0	100%
50% AMI Low	0	0	0	0	0%
60% AMI Moderate	0	0	0	0	0%
Totals	11	0	0	0	100%

Oakleigh Development: 10 credits
Block 35.30, Lot 20
880 Route 73 (C-1 district and LD Residential district)
9.7 acres
Status: Approved

This split zoned property was approved for construction of a hotel and restaurant in 2011, but the site was never developed. The front portion of the site (western) is within the C-1 zone and rear portion of the site, within the LD zoning district, is subject to a conservation restriction to protect the wetland and buffer areas. The conservation restriction was put in place as part of the property owner’s compliance with the 2011 approval. Oakleigh Development Group is now under contract to purchase the property and proposes to develop the front portion of the site with a 92 unit (100 bed) assisted living and memory care facility. The applicant received Zoning Board approval on September 21, 2020 and the resolution of approval is included as Appendix J.10. The developer agreed as a condition of approval that 10% of the beds will be income restricted and available to low and moderate income residents. The property meets the site suitability requirements set forth in N.J.A.C. 5:93 -5.3. In addition to zoning board approval the applicant has received a letter of interpretation and necessary permitting from NJDEP and access permits from NJDOT.

The facility will comply with the requirements set forth in 5:93-5.16 for assisted living residences. The 92 units will consist of 23 Memory Care Units (20 studios and 3 one-bedroom units) and 69 assisted living units (20 studios, 41 one-bedroom units, and 8 two-bedroom units). An affordability restriction will be reviewed by the Township’s administrative agent and will be filed prior to the issuance of a Certificate of Occupancy.

A draft deed restriction indicating the set aside of 10 affordable units is also provided in Appendix J.10.

	1 bedroom	2 bedroom	3 bedroom	Total	Percent
30% AMI Very Low	10	0	0	10	100%
50% AMI Low	0	0	0	0	0%
60% AMI Moderate	0	0	0	0	0%
Totals	10	0	0	10	100%

Artis Senior Living: 6 credits
Block 24.23, Lot 1
302 Lippincott Drive (C-1 district)
5.1 acres
Status: Complete

In 2013 Artis Senior Living applied for and was granted a “D” use variance to permit a congregate assisted living/memory care facility on a vacant property in the C-1 commercial zoning district (and EVCO) at Centre Boulevard and Lippincott Drive. The site is surrounded by office, bank, and retail commercial uses. As part of the approval, the Zoning Board requested, and the applicant agreed, that six (6) of the units/beds at the facility would be affordable to low- and moderate-income individuals. A site plan was subsequently approved and the facility was constructed and opened in 2016. An affordability restriction has been recorded and provides that 6 Medicaid beds will be maintained at the site. The restriction is included as Appendix J.8.

Within the facility, each of the Medicaid beds are provided within two bedroom studio units, which although listed as studio units do contain separated living spaces for each bedroom area within the larger studio unit. The units function more closely to a 2-bedroom unit than a studio.

A copy of the floor plan of the shared studio units illustrating the nature of the separated living space for two unrelated individuals is provided in Appendix J.8. The manager of the property has confirmed that these units are occupied by unrelated individuals.

	1 bedroom	2 bedroom	3 bedroom	Total	Percent
30% AMI Very Low	0	6*	0	6	100%
50% AMI Low	0	0	0	0	0%
60% AMI Moderate	0	0	0	0	0%
Totals	0	6*	0	6	100%
Although units are in a “shared studio”, they function and will be credited as if they were a 2-bedroom unit.					

CareOne at Evesham: 4 credits

Block 16, Lot 13

870-874 Route 70 East:

13.7 acres

Status: Approved

The property located at 870-874 Route 70 East is currently developed with the CareOne at Evesham continuing care facility and contains 68 assisted living and Alzheimer’s units in Building A and 159 skilled nursing beds in Building B. The facility was initially approved in 1998 and opened in 2000. The property owner has received approval for a 2 story, 26,946 square foot addition to Building A that will accommodate 41 additional assisted living (23) and Alzheimer’s(18) units. The proposed expansion was approved by the Zoning Board in accordance with Resolution ZB98-07A3 adopted on June 17, 2019, and will include 4 affordable beds. The facility will comply with the requirements set forth in 5:93-5.16 for assisted living residences. The affordable beds will be in studio units or if they are within a two bedroom unit, the bedrooms will be occupied by unrelated individuals. The units will be Medicaid units and will therefore be very low income units.

A copy of the deed restriction for this project is included in Appendix J.11.

	1 bedroom	2 bedroom	3 bedroom	Total	Percent
30% AMI Very Low	4	0	0	4	100%
50% AMI Low	0	0	0	0	0%
60% AMI Moderate	0	0	0	0	0%
Totals	4	0	0	4	100%

SPECIAL NEEDS HOUSING

Allies Inc: 4 credits
Block 13.04, Lot 2
14 Overington Avenue
Status: Completed

A 4-bedroom group home facility for four individuals with developmental disabilities is operated by Allies Inc at 14 Overington Avenue. The survey provided by the operator indicates that there are 40 year affordability controls on the property that will run through 2046. The Township will claim 4 credits through this project.

A copy of the license, survey, and funding agreement for the project can be found in Appendix K.1.

Allies Inc: 4 credits
Block 28.11, Lot 1
8 Radnor Boulevard
Status: Completed

Allies Inc. operates a second facility in the Township at 8 Radnor Boulevard. This facility is also a 4-bedroom home licensed by the state to serve four individuals with developmental disabilities. The survey provided indicates affordability controls on the property for 30 years, through 2037. The Township will claim 4 credits from this project.

A copy of the license, survey, and funding agreement for the project can be found in Appendix K.2.

Bancroft: 3 credits
Block 6.01, Lot 42
106 Harvest Road

Status: Completed

Bancroft owns and operates a home at 106 Harvest Road that contains 3 bedrooms that are available to clients. The Township will claim 3 credits from this group home facility.

A copy of the license and survey for this facility can be found in Appendix K.3.

Bancroft: 3 credits

Block 6.05, Lot 113

5002 Red Haven Drive

Status: Completed

Bancroft owns and operates a home at 5002 Red Haven Drive that contains 3 bedrooms that are available to clients. The Township will claim 3 credits from this group home facility.

A copy of the license and survey for this facility can be found in Appendix K.4.

Bancroft: 3 credits

Block 6.05, Lot 10

1505 Roberts Lane

Status: Completed

Bancroft operates a group home at 1505 Roberts Lane that contains 3 bedrooms that are available to clients. The Township will claim 3 credits from this group home facility. As the facility is not owned by Bancroft, but leased, the Township can provide documentation indicating from fire code inspections that this facility has been leased by Bancroft and operated as a group home at least as far back as 1999, and continues in operation today.

A copy of the license, survey, and fire inspection documentation for this facility can be found in Appendix K.5.

Bancroft: 4 credits

Block 10.06, Lot 6

46 East Cedar

Status: Completed

Bancroft leases and operates a group home at 46 East Cedar Avenue that contains 4 bedrooms that are available to clients. The Township will claim 4 credits from this group home facility. As the facility is leased and not necessarily under long term control of Bancroft, fire inspection reports dating back to 2005 indicate that this facility has been serving as a licensed group home for at least 16 years now.

A copy of the license, survey, and fire inspection documentation for this facility can be found in Appendix K.6.

Bancroft: 3 credits
Block 6.05, Lot 75
3301 Elberta Lane
Status: Completed

Bancroft leases and operates a group home at 3301 Elberta Lane that contains 3 bedrooms that are available to clients. The Township will claim 3 credits from this group home facility. As the facility is leased and not necessarily under long term control of Bancroft, fire inspection reports dating back to 2000 indicate that this facility has been serving as a licensed group home for at least 21 years now.

A copy of the license, survey, and fire inspection documentation for this facility can be found in Appendix K.7.

Bancroft: 4 credits
Block 8.07, Lot 23
5 Tenby Lane
Status: Completed

Bancroft leases and operates a group home at 5 Tenby Lane that contains 4 bedrooms that are available to clients. The Township will claim 4 credits from this group home facility. As the facility is leased and not necessarily under long term control of Bancroft, fire inspection reports dating back to 2000 indicate that this facility has been serving as a licensed group home for at least 21 years now.

A copy of the license, survey, and fire inspection documentation for this facility can be found in Appendix K.8.

Quality Management Associates (QMA): 3 credits
Block 13.24, Lot 40
305 North Elmwood Drive
Status: Completed

QMA operates a 4-bedrom facility on North Elmwood Drive. The group home is licensed to serve up to three individuals. The Township will claim 3 credits from this group home facility.

A copy of the license, survey, and capital funding agreement for this facility can be found in Appendix K.9.

Quality Management Associates (QMA): 3 credits

Block 183, Lot 16
140 Laurel Run
Status: Completed

QMA operates a 3-bedroom facility licensed to serve up to three individuals at 140 Laurel Run. The Township will claim 3 credits from this project.

A copy of the license, survey and funding agreement for this group home is located in Appendix K.10.

Oaks Integrated Care / Family Services: 3 credits
Block 13.30, Lot 24
7 Gaylord Lane
Status: Completed

Initially licensed to Family Services, Oaks Integrated Care took ownership of this property and now operates the facility at 7 Gaylord Lane. The group home contains 3-bedrooms for clients. The Township will claim 3 credits from this facility.

A copy of the license, survey, and financial documentation for this facility can be found in Appendix K.11.

Oaks Integrated Care: 4 credits
Block 11.42, Lot 92.01
100 Barn Road
Status: Completed

Oaks Integrated Care operates two group homes on two adjacent properties on Barn Road, one at 100 Barn Road and one at 100A Barn Road. The property was initially one lot that was subdivided in 2007 to create a new parcel for the second group home facility. Both group homes are licensed to serve 4 individuals in their own bedrooms. Information provided by Oaks indicates that there are 20-year affordability controls on the facility. The facility serves 1 low income tenant and 3 moderate income tenants according to financial agreements provided. The Township will claim 4 credits from this project.

A copy of the license, survey, and affordable housing agreement for the site can be found in Appendix K.12.

Oaks Integrated Care: 3 credits
Block 11.42, Lot 92.02

100A Barn Road

Status: Completed

The second group home operated by Oaks Integrated Care on Barn Road is also a 3-bedroom home that contains one bedroom that is handicapped accessible with its own bathroom. The Township will claim 3 credits from this facility.

A copy of the license, survey, and affordability controls can be found in Appendix K.13.

Oaks Integrated Care: 4 credits

Block 65, Lot 12.02

239 Chestnut Avenue

Status: Completed

Another one of Oaks facilities is located at 239 Chestnut Avenue. This facility is a 5-bedroom home that is licensed to serve up to 4 individuals. The Township will claim 4 credits from this facility.

A copy of the license and survey can be found in Appendix K.14.

Oaks Integrated Care: 4 credits

Block 64, Lot 1

538 Kettle Run Road

Status: Completed

Oaks Integrated Care also operates a facility on Kettle Run Road in the Township. Initially licensed in 2014, this facility is a 4-bedroom home licensed to serve 4 individuals. The Township will claim 4 credits from this group home facility.

A copy of the license and survey for this group home can be found in Appendix K.15.

Community Options: 4 credits

Block 13.45, Lot 43

151 Carlton Avenue

Status: Completed

Community Options owns and operates a 4-bedroom group home on Carlton Avenue that is licensed to support 4 individuals. The Township will claim 4 credits from this group home.

A copy of the facilities license, survey, certificate of occupancy, and funding agreement can be found in Appendix K.16

Community Options: 3 credits

Block 13.25, Lot 28

58 Longhurst

Status: Completed

Community Options also operates a 3-bedroom group home facility on Longhurst Road. The facility is licensed to serve 3 individuals with developmental disabilities. The Township will claim 3 credits from this project.

A copy of the license, survey, certificate of occupancy, and deed for the facility can be found in Appendix K.17.

Occupational Training Center (OTC) of Burlington County: 4 credits

Block 13.21, Lot 14

1 Longhurst Road

Status: Completed

OTC also operates a second facility in Evesham Township. This 4-bedroom group home is located on Longhurst Road and serves four individuals. The Township will claim 4 credits from this group home.

A copy of the license for this facility can be found in Appendix K.18.

Occupational Training Center (OTC) of Burlington County: 4 credits

Block 13.13, Lot 18

42 Concord Road

Status: Completed

The Occupational Training Center of Burlington County operates a 4-bedroom special needs housing facility for persons with developmental disabilities at 42 Concord Road. The facility has 20 year affordability controls that were put in place in 2018. The Township will claim 4 credits through this project.

A copy of the license and capital funding agreement for this facility can be found in Appendix K.19.

Bancroft: 3 credits

Block 6.05, Lot 9

1506 Roberts Lane

Status: Completed

Bancroft owns and operates a home at 1506 Roberts Lane that contains 3 bedrooms that are available to clients. The Township will claim 3 credits from this group home facility.

A copy of the license, survey, and other documentation for this facility can be found in Appendix K.20.

ADDITIONAL COMPLIANCE MECHANISMS

Market to Affordable Program: 22 credits

Location Varies

The Market to Affordable Program for For-Sale and Rental units is being established to create opportunities for low- and moderate-income households to buy or rent homes within existing neighborhoods in the Township. The Market to Affordable Program will utilize Affordable Housing Trust Fund Monies to “buy down” the cost of a market rate unit in order to make the unit affordable to a very low, low, or moderate income household for a 30-year restriction period. This program may also be supplemented with the Township’s Down Payment Assistance program, which offers up to \$15,000 toward down payment and closing costs for qualified buyers of affordable housing units.

In order to confirm the viability of the program, the Township and its Administrative Agent conducted market research to assess the availability and market rate costs of for-sale and rental units in the Township as compared to the amount that a low- or moderate-income household can typically pay for housing. For for-sale units the range of affordability was considered for one, two, and three bedroom units for a household earning 60% of area median income. For rental units a range of affordability was calculated for the number of bedrooms and to account for whether utilities are included or not included in the rent. Also, for rental units the difference between market rate rent and affordable rent (lost revenue to a landlord) over 30 years (at 2% annual inflation) was discounted to estimate the net present value of the required subsidy.

At the time of the analysis it was determined that both the for-sale and the rental program are viable with a subsidy of approximately \$45,000 per unit. The for-sale program is more likely to succeed in producing the desired number of units, as the benefit accrues directly to the low or moderate income buyer, who would not otherwise be able to afford the unit. The rental program will require the participation of a landlord who believes that the upfront net present value payment is worth the 30 years of reduced rent, potential reduction in total property value, and administrative costs associated with the affordable unit.

As of October 2018, there were approximately 39 housing units listed for sale in Evesham Township that could be made affordable through the Market to Affordable Program. In other words, the units are priced such that a \$45,000 subsidy would reduce the unit to an affordable range. The Affordable Housing Trust Fund Spending Plan includes a contingency for additional funds to subsidize units that will be “very low” income units. Given the fluctuations in the housing market since the time that this program and the subsidy levels were initially investigated, the Township will continually monitor the status of the program and consider adjustments to the subsidy amounts as necessary.

The Market to Affordable Program Guidelines (“Manual”) is included as Appendix D.5.

The Township has already completed the conversion of three market rate apartments into affordable units. The New Road Realty / Tamburro project at 37 South Maple Avenue is a five apartment unit development within two buildings, where three rental units were deed restricted as affordable units in 2016. 30 year deed restriction controls were placed on these units. One apartment was made affordable through a condition of a use variance granted to the property, while the other two affordable units were created through subsidies from the Township’s affordable housing trust fund. The affordable apartments include a moderate income 2-bedroom unit, and two low-income 1-bedroom units.

	1 bedroom	2 bedroom	3 bedroom	Total	Percent
30% AMI Very Low	0	0	0	0	100%
50% AMI Low	2	0	0	2	0%
60% AMI Moderate	0	1	0	1	0%
Totals	2	1	0	3	100%

A copy of the affordability controls for this project can be found in Appendix J.12.

The Township is committed to achieving the remaining 19 market to affordable conversions by the end of the reporting period in 2025. Although a market to affordable program is subject to the market availability of certain properties, the Township will make practical efforts to convert

***Extensions of Expiring Controls: 8 credits
Location varies***

As we are approaching the end of the Third Round of affordable housing in the state, there are a number of projects that were built in the Prior Rounds that have or will soon have their affordability controls expire. In particular most of the homes in the Whitebridge Village, Shannon Green, and Maresfield Court condominium developments were all developed in the early 1990’s with initial control periods of just 20 years. Also, the deed restrictions on those properties included provisions that in the event of a foreclosure, the affordability controls would be extinguished.

In an effort to maintain a sufficient stock of affordable homes in the Community, the Township as well as their appointed administrative agent, which was previously NJHMFA HAS, had a policy to extend the controls on many of these units that were threatened with foreclosure or at the time of sale. On at least 8 properties, the affordability controls have been extended and the length of the initial control period as well as the new controls would allow the Township to claim additional credits on these units for the Prior Round and the Third Round. The new deed restrictions and affordable housing agreements placed on the properties extended the controls on the properties for

99 years, or 30 years, and in a few cases in perpetuity. The 8 properties that have had their affordability controls extended and for which the Township will claim credit are in the table below.

Extensions of Controls				
Address	Initial Date	Initial Length of Controls	Date of Extension	Length of Controls
1108 Maresfield Ct	Apr 29 1994	20 years	Nov 28 2008	30 years
401 Quail Road	Nov 21 1994	30 years	Oct 29 2019	30 years
407 Quail Road	Nov 28 1994	Perpetuity / 20 years	Dec 28 2018	Perpetuity
1101 Squirrel Road	Oct 25 1995	Perpetuity / 20 years	Dec 21 2018	Perpetuity
1207 Squirrel Road	Mar 27 1996	99 years	Sep 25 2018	99 years
1307 Squirrel Road	Feb 9 1996	30 years / 99 years	Jun 27 2018	99 years
911 Rabbit Run Rd	May 29 1996	Perpetuity / 20 years	June 10 2002	99 years or 30 years
2511 Rabbit Run Rd	Jul 30 1997	Perpetuity / 20 years	Aug 1 2018	99 years

Deeds and affordable housing agreements for each of these properties can be found in Appendix J.19

Summary of Fair Share Plan

PRIOR ROUND

The Township has a requirement of 534 units in order to satisfy its Prior Round (1987 – 1999) obligation. In accordance with previous COAH rules found at N.J.A.C. 5:93, the Township must meet the following minimum and maximum requirements in addressing the 534 total unit obligation. A total of 534 credits are proposed to satisfy the Prior Round Obligation. In addition, the following requirements and limitations on these credits are met:

- **Age Restricted Units:** The Township may claim a maximum of 83 credits through age-restricted units. The following projects are age restricted and being credited towards the Prior Round:
 - Elmwood House – 69 units
 - The Township is claiming fewer age-restricted credits than would be permissible.
- **Rental Units:** The Township has an obligation to provide at least 134 rental units. The following rental units are being credited towards the Prior Round:
 - Inglis House – 16 units
 - Woodview – 44 units
 - Elmwood House – 69 units
 - Group Homes – 39 units in group homes
 - Total Rental Credits = 168 credits
- **Low/Moderate Income Split:** The Township is required to have 113 low income units in the Prior Round: The following credits are from units affordable to low-income households:
 - Inglis House – 16 units
 - Woodview – 22 units
 - Elmwood / B’Nai Brith – 69 units
 - Whitebridge Village – 21 units
 - Group Homes – 39 units
 - The Township has 128 low income units credited towards the First Round, excluding the 39 group home bedrooms that may also be considered to be low income units. The Township’s low income
- **Rental Bonus Credits:** The Township may claim bonus credits for rental units up to 134 bonus credit units. This may be either through 2.0 credits for family rental units, or 1.33 credits for age-restricted rental units, provided that no more than 50 percent of the rental obligation is met through age-restricted units

- The Township is claiming the following rental bonuses:
 - Inglis House – 16 bonus credits
 - Woodview – 44 bonus credits
 - Elmwood House (age-restricted) – 11 bonus credits
 - Group Homes – 39 bonus credits
 - Total rental bonus credits - 110
- **Income/Bedroom Distribution for Family Units:** The Township is required that for family units, the bedroom distribution shall follow UHAC requirements of a minimum of 20% as three bedroom units and a maximum of 20% as one-bedroom units. The breakdown of the distribution of units by income and bedroom size for all non age-restricted units, and also excluding special needs housing is as follows:

Prior Round Bedroom/Income Distribution					
	1 bed	2 bed	3 bed	Totals	Percent
Very Low	0	0	0	0	0
Low	10	30	3	43	42.6%
Mod	10	35	13	58	57.4%
Totals	20	65	16	101	100%
Percent	19.8%	64.4%	15.8%		

While the Township is deficient in the number of 3 bedroom units in the Prior Round, there is an excess of three bedroom family units in the Third Round that overall makeup this shortfall. This chart does not include the 16 low income one-bedroom units at Inglis House. The Township also has an excess of moderate income units in the Prior Rounds. This also is made up through the Third Round credits where an excess of low income units offsets the deficiency in the Prior Rounds.

THIRD ROUND

The Township has a requirement to provide 680 affordable units for its Third Round obligation. This obligation has the following limitations and requirements:

- **Age Restricted Units**: The Township can claim a maximum of 170 credits from senior age-restricted units. The following projects are age-restricted:
 - Elmwood House – 20 credits
 - Evesham Senior / Walters – 68 credits
 - Hawthorne / Evesham Retirement – 24 credits
 - Brightview – 27 credits
 - Artis Senior – 6 credits
 - Capitol Senior / Marlton Executive – 11 credits
 - Oakleigh – 10 credits
 - CareOne – 4 credits
 - The Township is claiming a total of 170 senior age-restricted credits.

- **Family Units**: A minimum of 255 units must be available to families. The following projects are family units:
 - Mend/Conifer Sharp Road – 104 credits
 - Habitat for Humanity – 3 credits
 - Cornerstone / Evesham Family Apts – 64 credits
 - Fieldstone / Barclay – 33 credits
 - Renaissance Square / Tri-Towne – 34 credits
 - Harvest House – 8 credits
 - Winding Brook – 6 credits
 - Berkshire Woods / Timber Ridge – 6 credits
 - DPW Yard – 16 credits
 - Tamburro / New Road M2A – 3 credits
 - Extensions of Controls – 8 credits
 - Total family units = 285 credits

- **Rental Units**: A minimum of 170 rental units must be provided, with at least half of those (85) available to families. The following projects are rental units.

- Elmwood House – 20 credits (senior)
 - Mend/Conifer Sharp Road – 104 credits (family)
 - Cornerstone / Evesham Family Apts – 64 credits (family)
 - Evesham Senior /Walters – 68 credits (senior)
 - Brightview – 27 credits (senior)
 - Capitol Seniors / Marlton Executive – 11 credits (senior)
 - Oakleigh – 10 credits (senior)
 - CareOne – 4 credits (senior)
 - New Road / Tamburro – 3 credits (family)
 - Fieldstone – 33 credits (family)
 - Renaissance Square / Tri-Towne – 34 credits (family)
 - Harvest House – 8 credits (family)
 - DPW Yard – 16 credits (family)
 - The Township is claiming a total of 402 credits through rental units, not including the special needs facilities, which are also rental units.
 - The Township is claiming 262 credits through rental units available to families.
- **Low/Moderate Income Split:** A minimum of 255 units must be available to low income households. The following Third Round projects include low or very low income units:
 - Elmwood House – 20 units
 - Mend / Conifer – 88 units
 - Habitat for Humanity Radnor – 1 unit
 - Habitat for Humanity Oak Ave– 1 unit
 - Cornerstone / Evesham Family Apts – 32 units
 - Evesham Senior / Walters – 34 units
 - Hawthorne / Evesham Retirement – 12 units
 - Brightview – 14 units
 - Artis Senior – 6 units
 - Capitol Senior / Marlton Executive - 11 units
 - Oakleigh – 10 units
 - CareOne – 4 units
 - New Road / Tamburro M2A – 2 units

- Fieldstone / Barclay – 17 units
 - Renaissance Square / Tri-Towne – 18 units
 - Harvest House – 5 units
 - Winding Brook – 3 units
 - Berkshire Woods – 3 units
 - DPW Yard – 8 units
 - Group Homes – 70 units
 - In total, the Township is providing 289 units that are affordable to low or very low income households, plus the 70 group home bedrooms that are available to low income special needs individuals.
- **Very Low Income Units:** The Township must provide at least 51 units affordable to very low income households, those households earning less than 30% of the area median income. At least 26 units must be available to very low income families.

The Township’s very low income unit obligation is generated by the following projects, which were approved after July of 2008:

Very-Low Income Unit Obligation		
Project Name	Address	Total Units
Habitat for Humanity	10 Radnor Ave	1
Habitat for Humanity	36 Oak Avenue	2
Cornerstone / Evesham Family (Walters)	4 Executive Drive	64
Evesham Senior (Walters)	16 Stow Road	68
Hawthorn / Evesham Retirement	405 Lippincott Dr	24
Brightview at Evesham	170 Greentree Rd	27
Artis Senior Living	302 Lippincott Dr	6
Capitol Seniors / Marlton Executive	5 Executive Drive	11
Oakleigh	880 Route 73	10
CareOne at Evesham	870-874 Route 70E	4
New Road Real Estate / Tamburro	37 S Maple Ave	3
Market to Affordable	Various	19
Fieldstone / Barclay Chase	880/890 Route 70 East	33
Renaissance Square / Tri Towne	101 Route 70 East	34
Harvest House	52 East Main St	8
Winding Brook / Krysta Enterprises	170 Sharp Road	6

Very-Low Income Unit Obligation		
Berkshire Woods / Testa Site	518, 522, 526 N Elmwood Road	6
Barclay Chase at Marlton II / DPW Site	501 Evesboro-Medford Road	16
Group Homes	Various	48
Totals		390
VLI Required = 13%		51
Family VLI Required = 0.5 obligation		26

The following projects provide very low income units as a part of the Third Round Compliance Plan:

- Evesham Senior – 9 units
- Cornerstone / Evesham Family Apts – 8 units
- Evesham Retirement – 4 units
- Brightview – 9 units
- Artis Senior – 6 units
- Capitol Seniors – 11 units
- Oakleigh – 10 units
- CareOne – 4 units
- Renaissance Square / Tri-Towne – 5 family units
- Barclay Chase – 5 family units
- Harvest House – 1 family unit
- DPW Yard – 3 family units
- *Mend Conifer / Sharp Road – 11 family units (35% AMI) – NOT COUNTED*
- The Township is providing a total of 75 units that are affordable to very-low-income households, with 22 of those units being available to families. The Township has satisfied the minimum requirements for the overall number of units affordable to very low-income families, however there is a deficiency of 4 very low income family units.
- Although there is technically a deficiency of 4 family units that are priced to be affordable to a household earning 30% or less of area median income, it must be considered that there are 11 units of family housing in the MEND / Conifer Sharp Road project that are priced to be affordable at 35% of the area median income, just above the threshold for very low income set in the settlement agreement. If these units were to be considered as very low income rather than low income, the Township would have 86 total very low income units, 33 of them being available to families.

- **Rental Bonus Credits:** The Township may claim a maximum of 170 bonus credits from rental units. The following rental projects will be claimed for bonus credits:
 - MEND / Conifer Sharp Road – 78 bonus credits
 - Cornerstone / Evesham Family Apts – 64 bonus credits
 - Fieldstone / Barclay – 28 bonus credits
 - The Township is claiming the full amount of bonus credits available.
 - All of these bonus credits are from family rental units. No bonus credits in the Third Round are being claimed from special needs housing or from age-restricted senior housing.

- **Income / Bedroom Distribution:** All third round credits for family units required to comply with UHAC for income and bedroom distribution. While not all individual projects are compliant, the Township overall complies with these requirements. The chart below shows the income and bedroom distribution for family unit credits for Third Round projects, which includes Mend / Conifer Sharp Road, both Habitat for Humanity projects, Cornerstone/Evesham Family Apartments, New Road/Tamburro, Fieldstone, Renaissance Square/Tri-Towne, Harvest House, Winding Brook, Berkshire Woods, and the DPW Yard:

Third Round Bedroom/Income Distribution					
	1 bed	2 bed	3 bed	Totals	Percent
Very Low	12	15	9	36	12.9%
Low	19	80	60	159	57.0%
Mod	11	48	25	84	30.1%
Totals	42	143	94	279	100%
Percent	15.1%	51.3%	33.7%		

The chart above illustrates that the deficiencies in the Prior Round crediting of insufficient 3-bedroom units and too many moderate income units are made up in the Third Round, with an excess of 3-bedroom and low-income units.

AFFORDABLE HOUSING ADMINISTRATION

Affordable Housing Ordinances

As required by the Settlement Agreement, the Township has adopted an updated affordable housing ordinance, Ordinance 18-3-2021, also found in Section 161-2 of the Township Code that provides requirements for all affordable housing developments and units which is consistent with the requirements of the Fair Housing Act and the Settlement Agreement.

The Township has also adopted a development fee ordinance, Ordinance 17-3-2021, found in Section 161-3 of the Township Code that requires all non-residential developments and residential developments that do not provide affordable housing to make a contributions to the Township's Affordable Housing Trust Fund at the time of construction and occupancy of new developments.

Copies of the Township's affordable housing ordinance and development fee ordinance, and their respective amendments, can be found in Appendix C.5 through C.7.

Affordable Housing Trust Fund

A mandatory development fee ordinance creating a dedicated revenue source for affordable housing was adopted by the Township in 1999 and was approved by the Superior Court on November 18, 1999. At the same time, an Affordable Housing Trust Fund account was established for the purpose of depositing development fees, payments-in-lieu of construction of on-site affordable housing, proceeds from the sale of affordable units with extinguished controls, developer contributions for handicap adaptability, repayments from affordable housing program loans, proceeds from the sale of affordable units, and any other funds collected by the Township in connection with its affordable housing programs. The affordable housing development fee ordinance (section 161-3) was updated to reflect the third round COAH rules and the Statewide Mandatory Development Fee requirements and was approved by COAH on March 26, 2009 and then adopted by the Township on May 19, 2009.

In order to utilize the monies collected in the Affordable Housing Trust Fund (AHTF), the Township must have an approved plan for spending the funds in conformance with the Fair Housing Act and the Council on Affordable Housing's (COAH) rules. The Township's first Spending Plan was approved by the Court on January 11, 2002. From 2002 to 2012, the 2002 Spending Plan guided expenditures from the Affordable Housing Trust Fund consistent with COAH's rules, the Township's Fair Share Plan, and the Court's authorization. From 2012 through October 2018 expenditures have been authorized by the Spending Plan adopted and approved in 2015, by subsequent Court Orders, and by the 2018 Spending Plan and 2020 Spending Plan Update.

The 2018, 2020, and a 2021 updated Spending Plan are provided in Appendix D.7.

The AHTF Spending Plan is intended to demonstrate commitment of the funds in the Affordable Housing Trust Fund within four years of the date of collection as required by P.L. 2008 c.46, and to outline the Township's plan to utilize the funds in support of proposed and existing affordable housing within the Township. The adopted spending plans and the draft Updated Spending Plan provides a specific plan for

the expenditure of the monies collected as of November of 2021 and also for anticipated revenue during the Third Round. Revenues from the Trust Fund are used for programs such as down payment assistance as outlined in Appendix D.6.

The Spending Plan will be amended as needed to respond to emerging opportunities and to adjust for unanticipated revenues or shortfalls.

Administrative Agent

The Township has contracted with, and will continue to work with a qualified administrative agent to ensure that all affordable housing units are properly affirmatively marketed and that all buyers or tenants of a unit are properly income qualified. Community Grants Planning & Housing (CGP&H) currently serves as the Township’s administrative agent for affordable housing programs.

Some 100% affordable development projects however are administered by the developer in-house.

A contract between the Township and CGP&H to serve as the appointed administrative agent can be found in Appendix D.2, and a copy of the administrative agent’s policies and procedures manual can be found in Appendix D.3.

A copy of the Township’s affirmative marketing plans can be found in Appendix D.4.

The Administrative Agent coordinates with the Township’s Municipal Housing Liaison, the designated staff member responsible for affordable housing. A copy of the Resolution appointing a Municipal Housing Liaison can be found in Appendix D.1.

APPENDICES