

## GT Clerk

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**From:** Denise Coyne <opra+request-16535-64dd1633@requests.opramachine.com>  
**Sent:** Tuesday, September 8, 2020 2:23 PM  
**To:** GT Clerk  
**Subject:** OPRA request - Housing Element and Fair Share Plan

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Dear Gloucester Township,

This is a request for public records made under OPRA and the common law right of access. I am not required to fill out an official form. Please acknowledge receipt of this message.

Records requested:

Please provide Gloucester Township's most recently adopted Housing Element and Fair Share Plan

Yours faithfully,

Denise Coyne

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Please use deliver records electronically via email to the below UNIQUE address for all replies to this request:  
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**GLOUCESTER TOWNSHIP**  
**Camden County, New Jersey**



## Housing Element and Fair Share Plan

**March 2018**

**Adopted by the Gloucester Township Planning Board  
on March 27 2018**

Steven M. Bach , PE, RA, PP, CME

Candace A. Kanapue, AICP, PP

The original of this document was signed and  
sealed in accordance with NJAC 13:41-1.3.b

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## I. INTRODUCTION

### A. COUNCIL ON AFFORDABLE HOUSING (COAH)

The New Jersey Supreme Court ruled in 1975, in a decision now commonly referred to as “*Mount Laurel I*”, that developing municipalities in New Jersey have a constitutional obligation to provide a realistic opportunity for the construction of low and moderate income housing. Then in 1983 in the “*Mount Laurel II*” decision, the Supreme Court went further, creating an incentive for private developers to enforce the Mount Laurel doctrine by suing municipalities that have not chosen to comply with the *Mount Laurel* principles. Needing a mechanism to implement the *Mount Laurel* doctrine, the legislature adopted the Fair Housing Act (N.J.S.A. 52:27D-310) in 1985, and created the Council on Affordable Housing as the administrative alternative to dealing with affordable housing cases through the courts. COAH was given the responsibility to establish housing regions, estimate low and moderate income housing needs, set criteria for municipalities to determine and address their fair share affordable housing numbers, and review and approve housing elements and fair share plans.

On December 20, 2004, COAH's first version of the third round rules became effective. At that time the third round was to cover the time period from 1999 to 2014, since the first and second rounds covered the 1987 to 1999 period. The Round III affordable housing delivery period was to run from January 1, 2004 through January 1, 2014. The third round rules were based upon a new methodology that provided for affordable housing as a “growth share” instead of assigning an absolute number to each municipality as had been done in prior rounds. The third round rules implemented a “growth share” approach that linked the production of affordable housing with future residential and non-residential development within a municipality. 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 one affordable unit for every 8 market rate housing units developed and one affordable unit for every 25 jobs created.

On March 10, 2015, the Supreme Court ruled that the New Jersey Council on Affordable Housing (COAH) has failed to act, and as a result, the Courts will be assuming jurisdiction over the Fair Housing Act. The Order divides municipalities into one of three categories – those that achieved third round substantive certification, those that filed or petitioned COAH and those that have never participated in the COAH process.

As Gloucester petitioned or “participated” in 2008, the order allows participating municipalities such as Gloucester to file a Declaratory Judgement Action (DJA) during the thirty day window of June 8 - July 8, 2015. Gloucester alerted the Court that the Township wishes to comply with its constitutional mandate to provide affordable housing and filed a DJA on July 7, 2015.

Gloucester has prepared this plan to comply with the Court's Order in its obligation for the period between 1999 -2025.

A municipality's third round fair share plan must address (1) its rehabilitation share, (2) the prior round obligation and (3) projected or prospective third round obligation. The rehabilitation share is the estimated number of existing substandard housing units in a municipality that are occupied by low or moderate income households, as determined by COAH (N.J.A.C. 5:97). The prior round obligation is a municipality's adjusted second round new construction component brought forward to the third round (N.J.A.C. 5:97).

Third round housing plans must document how existing or proposed affordable housing units satisfy (1) its rehabilitation share, (2) the prior round obligation and (3) projected or prospective third round obligation. This Housing Element and Fair Share Plan is prepared utilizing the Prior Round Rules (N.J.A.C. 5:91 Procedural and N.J.A.C. 5:93 Substantive) as well as the guidance provided in the March 10, 2015 Supreme Court Order.

## **B. HOUSING ELEMENT AND FAIR SHARE PLAN REQUIREMENTS**

The Township must prepare and submit both a Housing Element (an element of Master Plan) and Fair Share Plan (describing how the Township will address the obligation). The requirements of the Housing Element are outlined below (N.J.A.C. 5:97-2.1, 2.3 and N.J.S.A. 52:27D-310).

The Housing Element must review and analyze the Township's housing stock, demographic and employment characteristics, leading into the Fair Share Plan, which will demonstrate how the Township will endeavor to provide for its Fair Share obligation. The Housing Element must provide an analysis demonstrating that the plan will provide a realistic opportunity to meet the housing Township's obligations and identify which ordinances must be revised to incorporate the provisions for low and moderate income housing. A municipality's housing element must be designed to achieve the goal of access to affordable housing to meet present and prospective housing needs, with particular attention to low and moderate income housing.

### **1. Housing Element Requirements under the Fair Housing Act:**

- a. An inventory of the municipality's housing stock by age, condition, purchase or rental value, occupancy characteristics, and type, including the number of units affordable to low and moderate income households and substandard housing capable of being rehabilitated, and in conducting this inventory the municipality shall have access, on a confidential basis for the sole purpose of conducting the inventory, to all necessary property tax assessment records and information in the assessor's office, including but not limited to the property record cards;
- b. A projection of the municipality's housing stock, including the probable future construction of low and moderate income housing, for the next ten years, taking into account, but not necessarily limited to, construction permits issued, approvals of applications for development and probable residential development of lands;
- c. An analysis of the municipality's demographic characteristics, including but not necessarily limited to, household size, income level and age;

- d. An analysis of the existing and probable future employment characteristics of the municipality;
- e. A determination of the municipality's present and prospective fair share for low and moderate income housing and its capacity to accommodate its present and prospective housing needs, including its fair share for low and moderate income housing; and
- f. A consideration of the lands that are most appropriate for construction of low and moderate income housing and of the existing structures most appropriate for conversion to, or rehabilitation for, low and moderate income housing, including a consideration of lands of developers who have expressed a commitment to provide low and moderate income housing.

### **C. MUNICIPAL SUMMARY**

The land area of Gloucester Township is 23.24 square miles and is located in south central Camden County. Gloucester Township is bordered by Runnemede, Magnolia, Somerdale, Hi-Nella, Stratford, Lindenwold and Pine Hill Boroughs and Winslow and Washington and Deptford Townships.

The 2014 population estimate for Gloucester is 64,356 persons based on 2010 U.S. Census Bureau data and the number of certificates of occupancy, less any demolition permits, multiplied by the average number of persons per unit.

### **D. AFFORDABLE HOUSING HISTORY**

A Summary of Gloucester's historic affordable housing timeline is provided below:

#### **First and Second Round Obligation**

1. On March 6, 1996, the Township of Gloucester secured substantive certification of its cumulative Cycle I/Cycle II Housing Element and Fair Share Plan ("Cycle II Plan") from the New Jersey Council on Affordable Housing ("COAH").
2. By voluntarily complying with its Mount Laurel obligations through COAH's administrative process, Gloucester Township secured immunity from Mount Laurel lawsuits until December 20, 2005.
3. While the Township was implementing its approved Cycle II Plan, COAH adopted its initial Cycle III regulations, which became effective on December 20, 2004

#### **Third Round Obligation**

COAH first proposed third round substantive and procedural rules in October, 2003. 35 N.J.R. 4636(a); 35 N.J.R. 4700(a). Those rules remained un-adopted and COAH re-proposed both the substantive and procedural third round rules (N.J.A.C. 5:94 and 5:95) in August of 2004 and adopted the same effective on December 20, 2004. (the "2004 Regulations")

The Township of Gloucester's third round participation may be summarized as follows:

1. The Township commenced work on its initial Round 3 Plan, but that work was suspended when, on January 25, 2007, the Appellate Division struck down COAH's original Third Round Methodology. See In re Adoption Of N.J.A.C. 5:94 and 5:95 By New Jersey Council On Affordable Housing, 390 N.J.Super. 1 (App. Div.), certif. denied 192 N.J. 72 (2007).
2. In August of 2008, COAH adopted amended Cycle III regulations, which became effective on October 20, 2008.
3. Pursuant to those amended regulations, the deadline for a municipality to adopt, endorse, and file its amended Cycle III plan was December 31, 2008.
4. On December 31, 2008, the Township met COAH's deadline and filed its duly adopted and endorsed Cycle III plan ("2008 Plan"), and petitioned COAH for Cycle III certification.
5. However, after COAH granted a number of reasonable extensions of the deadline to repetition, the Appellate Division again invalidated COAH's regulations in In Re the Adoption of 5:96 and 5:97 by the New Jersey Council on Affordable Housing, 416 N.J.Super. 462 (App. Div. 2010).

#### **Township of Gloucester Continuing Efforts**

1. Affordable Housing Trust Fund. The Township will continue to collect the mandatory development fee from non-inclusionary residential developments. The Trust Fund monies may be used for a market to affordable program, for rehabilitation program, or other eligible programs in support of affordable housing. An updated Spending Plan will likely be required.
2. On November 23, 2015, the Township entered into a Municipal Shared Services Defense Agreement for retaining a common expert to determine a fair share housing obligation. This report was received in December, 2015. A housing plan and fair share element is being prepared based on the expert's calculations in addition to taking the Fair Share Housing Center's calculations into account.
3. The Township filed a Declaratory Judgment Complaint on July 7, 2015.
4. On April 13, 2016, Township representatives participated in a Court mediation with representatives of Fair Share Housing.
5. Efforts to settle with the Fair Share Housing Center continue. A Fairness Hearing is scheduled for November 16, 2016. This hearing was continued due to the Objection of Michael Procacci. The Township has made worked to include the Procacci property into the Housing Plan and a new Fairness Hearing is now scheduled for \_\_\_\_, 2017.



## E. FAIR SHARE OBLIGATIONS

| <b>Gloucester Township<br/>Affordable Housing Obligations<br/>as outlined in Fair Share Housing Center's Report dated July, 2015 and July 2016</b> |       |
|----------------------------------------------------------------------------------------------------------------------------------------------------|-------|
| Rehabilitation (Present Need)                                                                                                                      | 135   |
| Prior Round (1987 – 1999)                                                                                                                          | 359   |
| Third Round (Prospective Need 1999-2025)                                                                                                           | 1,449 |

## II. HOUSING ELEMENT ANALYSIS

Except when more recent reliable data is available, 2010 Census data has been utilized for demographic and housing data analysis. It is now the beginning of 2016 and some new 5-year data is available by the American Community Survey (ACS). Some of the 2010 Census data is now outdated, but it must be relied upon for lack of a superior alternative.

### A. EXISTING HOUSING STOCK

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.

According to the Census estimate, in 2014 there were 24,924 year-round housing units in Gloucester, of which 23,085 were occupied and 1,839 were vacant, in 2010 the vacancy rate was 1.3% for homeowners and 5.8% for rentals.

#### 1. Age of Housing Stock

The Gloucester Township housing stock is younger than the majority of the County stock and the number of persons per household is slightly larger than that of the county. The median year for housing unit construction in Gloucester Township is 1976.

|                     | Persons Per Household<br>at 2010 Census | % Housing Stock Built<br>1939 or Earlier | Median Year<br>Structure Built |
|---------------------|-----------------------------------------|------------------------------------------|--------------------------------|
| Gloucester Township | 2.73                                    | 4.7                                      | 1976                           |
| Camden County       | 2.65                                    | 17.3                                     | 1965                           |

Source: U.S. Census Bureau, 2014 ACS

| Gloucester Township<br>Age of Housing Stock |                 |                               |
|---------------------------------------------|-----------------|-------------------------------|
| Year Constructed                            | Number of units | Percent of Total in Year 2010 |
| 2010 – 2014 est.                            | 57              | 0.2                           |
| 2000 to 2009                                | 1,738           | 7                             |
| 1990 to 1999                                | 3,994           | 16                            |
| 1980 to 1989                                | 4,253           | 17.1                          |
| 1970 to 1979                                | 6,712           | 26.9                          |
| 1960 to 1969                                | 3,634           | 14.6                          |
| 1950 to 1959                                | 2,629           | 10.5                          |
| 1940 to 1949                                | 790             | 3.2                           |
| 1939 or earlier                             | 1,117           | 4.5                           |

According to the residential building permit data from the New Jersey Department of Community Affairs, 16 residential certificates of occupancy were issued between 2010 and 2014 in the Gloucester Township.

## 2. Condition and Substandard Units

Of the 23,085 occupied housing units in existence at the time of the 2010 Census, 57 units were reported to be without complete plumbing facilities and 58 units were lacking complete kitchen facilities. There are 299 units within the Township that have more than one (1) occupants per room. An assessment of the number of substandard units capable of being rehabilitated may be made by considering the number of homes without complete plumbing and kitchen facilities since this information is provided in the Census sample data, but there are other factors to consider as well. Occupied housing units with a low a market value relative to the average in the area may be an indicator of potential for rehabilitation. COAH has also used "crowding" and the age of the housing units to estimate the number of units in need of rehabilitation. There are surely at least a few units that are in need of rehabilitation, within the Township.

The table below presents a breakdown of the Township's housing stock by number of rooms as they relate to County averages. The Township has a larger percentage of homes with more than six rooms than Camden County overall, with the median number of rooms in the Township at 6.3 per housing unit.

| Gloucester Township<br>Number of Rooms in Housing Units |                          |                 |                    |
|---------------------------------------------------------|--------------------------|-----------------|--------------------|
| Gloucester<br># of Rooms                                | Gloucester<br># of Units | Gloucester<br>% | Camden County<br>% |
| 1                                                       | 264                      | 1.1%            | 1.5%               |
| 2                                                       | 245                      | 1.0%            | 1.7%               |
| 3                                                       | 1,895                    | 7.6%            | 9.8%               |
| 4                                                       | 2,882                    | 11.6%           | 12.6%              |
| 5                                                       | 3,927                    | 15.8%           | 14.5%              |
| 6+                                                      | 15,711                   | 63.1%           | 59.9%              |
| Median for<br>Gloucester                                | 6.3 rooms                |                 | 6.0 rooms          |

## 3. Ownership and Rental Characteristics

A majority, 74.1 percent, of Gloucester's population live in owner occupied housing units, while 25.9 percent of the population lived in rented housing units at the time of the 2010 Census. Almost 77 percent of the total housing units in Gloucester Township are single family dwellings (rented and owned), 1.6 percent are mobile homes.

| Year Round Housing Units |        |        | Owner-occupied |       | Rental |       |
|--------------------------|--------|--------|----------------|-------|--------|-------|
| Occupied                 | Vacant | Total  | No.            | %     | No.    | %     |
| 23,085                   | 1,839  | 24,924 | 17,099         | 74.1% | 5,986  | 25.9% |

#### 4. Occupancy Characteristics and Housing Type

The vacancy rate for year round units is low in the Township, 1.3% vacancy for owner-occupied units and 5.8% occupancy for rental units. The average household size in the Township is 2.90 persons per owner occupied units and 2.38 for renter occupied units.

The number of bedrooms in a home is often reflective of the size of a home. The municipalities with a newer housing stock, have a larger percentage of units with more bedrooms. This is reflective of the trend toward larger, more sprawling homes in America over the last several decades. Gloucester has an older stock of homes and therefore lends itself to a larger percentage of homes with two to three bedrooms.

|                     | Bedroom Distribution<br>Percent of Housing Stock With: |                |             |
|---------------------|--------------------------------------------------------|----------------|-------------|
|                     | One or less Bedrooms                                   | 2 - 3 Bedrooms | 4+ Bedrooms |
| Gloucester Township | 12.5%                                                  | 59.1%          | 28.4        |
|                     |                                                        |                |             |
| Camden County       | 15.8%                                                  | 60.5%          | 23.7%       |

Source: U.S. Census Bureau, ACS 2010-2014 DP04

| Percent Distribution of Housing Units by Structure Type<br>Gloucester Township |                 |            |
|--------------------------------------------------------------------------------|-----------------|------------|
|                                                                                | Number of units | Percentage |
| 1 (detached)                                                                   | 15,557          | 62.4%      |
| 1 (attached)                                                                   | 3,509           | 14.1%      |
| 2                                                                              | 877             | 3.5%       |
| 3-4                                                                            | 945             | 3.8%       |
| 5-9                                                                            | 1,087           | 4.4%       |
| 10-19                                                                          | 1,391           | 5.6%       |
| 20+                                                                            | 1,156           | 4.6%       |
| Mobile                                                                         | 402             | 1.6%       |
| Other                                                                          | 0               | 0          |
| Total                                                                          | 24,924          | 100%       |

Source: U.S. Census Bureau, ACS 2010-2014 DP04

| Selected Housing or Housing-Related Value Characteristics |                      |                      |                         |                         |
|-----------------------------------------------------------|----------------------|----------------------|-------------------------|-------------------------|
|                                                           | Median Value Housing | Median Contract Rent | Median Household Income | Rental Vacancy Rate (%) |
| Gloucester Township                                       | \$207,300            | \$1,148              | \$72,699                | 5.8%                    |

Source: U.S. Census Bureau, ACS 2010-2014 5 Year Estimate

## B. DEMOGRAPHIC CHARACTERISTICS

*An analysis of the municipality's demographic characteristics, including but not necessarily limited to, household size, income level and age.*

### 1. Historic Population Trends

Gloucester Township's population increased 120% between 1950 and 1960, and continued to grow consistently through 2000. The population has levelled out since 2000, with its current 2014 estimate of 64,356. The table below shows the population changes from 1940 through 2014.

| Gloucester Township, Camden County Population |       |        |        |        |        |        |        |        |
|-----------------------------------------------|-------|--------|--------|--------|--------|--------|--------|--------|
| 1940                                          | 1950  | 1960   | 1970   | 1980   | 1990   | 2000   | 2010   | 2014*  |
| 6,198                                         | 7,952 | 17,591 | 26,511 | 45,156 | 53,797 | 64,350 | 64,634 | 64,356 |

Table 6. New Jersey Resident Population by Municipality 1930-1990; \* US Census, estimate

### 2. Recent Population Change

Between 2010 and 2014, the population in Gloucester decreased from 64,634 to 64,356, a decrease of 278 people or 0.43%.

### 3. Population Density

In 2010, the population density in Gloucester Township was 2,779 people per square mile, which is more than Camden County's and State's population density overall.

| Gloucester Township and Surrounding Municipalities Density Indicators |              |                        |                           |
|-----------------------------------------------------------------------|--------------|------------------------|---------------------------|
|                                                                       | Square Miles | Population per sq mile | Housing units per sq mile |
| Gloucester                                                            | 23.26        | 2,779                  | 1,062                     |
| Camden County                                                         | 227.29       | 2,260                  | 901.7                     |
| New Jersey                                                            | 8,722.58     | 1,195.49               | 483.2                     |

Source: Calculated from U.S. Census Bureau, 2010 Census data

#### 4. Age of Population

The table below provides a breakdown of Gloucester's population by age cohorts and gender in 2010. The largest age cohort is the 45-54 years of age bracket, with 15.4% of the total population. This is consistent with the Township's median age of 39 years. The second largest age cohort is the 5-14, with 13.9% of the population. The Township has an equally diverse range of ages and should continue to accommodate and plan for this diverse population.

| <b>Gloucester Township<br/>Summary Population Characteristics 2010</b> |                  |            |
|------------------------------------------------------------------------|------------------|------------|
|                                                                        | Number of People | % of Total |
| Male                                                                   | 31,545           | 49.0%      |
| Female                                                                 | 32,811           | 51.0%      |
| Total                                                                  | 64,356           | 100.0      |
|                                                                        |                  |            |
| Under 5                                                                | 3,237            | 5.0%       |
| 5 – 14                                                                 | 8,961            | 13.9%      |
| 15 – 24                                                                | 8,716            | 13.5%      |
| 25 – 34                                                                | 8,375            | 13.0%      |
| 35 - 44                                                                | 8,784            | 13.6%      |
| 45 - 54                                                                | 9,913            | 15.4%      |
| 55 - 64                                                                | 8,552            | 13.3%      |
| 65+                                                                    | 7,818            | 12.1%      |
|                                                                        |                  |            |
| Median Age                                                             | 39               | N/A        |

Source: U.S. Census Bureau, 2010 Census

## 5. Household Characteristics

The next table includes family and household characteristics of the Township. In 2010, there were 23,566 households and 16,865 families in Gloucester with an average of 2.73 persons per household. The table below indicates that Gloucester is comprised of a majority of husband-wife households (52.4%) with the second largest household type being non-family householders at 28.4%.

|                                | Number of Households | Percent |
|--------------------------------|----------------------|---------|
| Family Households              | 16,865               | 71.6    |
| Husband-Wife Family            | 12,357               | 52.4    |
| with children                  | 5,464                | 23.2    |
| Male Householder, no wife      | 1,193                | 5.1     |
| Female householder, no husband | 3,315                | 14.1    |
| Non Family Households          | 6,701                | 28.4    |
| Male living alone              | 2,269                | 9.6     |
| Female living alone            | 3,111                | 13.2    |
| Total Households               | 23,566               | 100     |

Source: U.S. Census Bureau, 2010 Census DP-1

## 6. Income Level & Poverty Status

The 2010 Census data has not yet been released for income and poverty, as is the case for many of the other demographic census information herein. Therefore, five-year American Community Survey (ACS) estimates were relied upon. Gloucester has higher percentages of households in higher income brackets than the County overall. The Township had a 2014 household median income of \$72,999, compared with the Camden County household median income of \$80,892. 6.1% percent of Gloucester's families had household incomes below the federal poverty level, compared with 10.4% in the County.

Council on Affordable Housing (COAH) regulations define low income (those earning up to 50% of the median household income for the region) and moderate income households (those earning from more than 50% to 80% of the median household income for the region). The figures are adjusted for household size and the municipality's geographic location since cost of living differs among regions.

Gloucester is located within Region Five, which includes Gloucester, Gloucester and Burlington Counties. The 2014 income guidelines for Region Five (based on household size) range from \$45,640.00 (one person household) to \$65,200.00 (four person household) for the upper limits of what is considered moderate income; and \$28,525.00 (one person household) to \$40,750.00 (eight person household) for the upper limit of what is considered low income. Median 2014 income for the region ranges from \$57,050 to \$81,500.

| Gloucester Township<br>2014 Household Income |                     |              |               |                 |            |         |
|----------------------------------------------|---------------------|--------------|---------------|-----------------|------------|---------|
|                                              | Gloucester Township |              | Camden County |                 | New Jersey |         |
|                                              | Households          | Gloucester % | Households    | Camden County % | Households | State % |
| Less than \$10,000                           | 1,082               | 4.7          | 13,548        | 7.2             | 167,356    | 5.3%    |
| 10,000 - 14,999                              | 658                 | 2.9          | 8,993         | 4.8             | 126,043    | 4.0%    |
| 15,000 - 24,999                              | 1,927               | 8.3          | 17,557        | 9.4             | 251,596    | 7.9%    |
| 25,000 - 34,999                              | 1,707               | 7.4          | 15,808        | 8.4             | 250,896    | 7.9%    |
| 35,000 - 49,999                              | 2,603               | 11.3         | 21,690        | 11.6            | 354,166    | 11.2%   |
| 50,000 - 74,999                              | 3,942               | 17.1         | 31,558        | 16.9            | 537,687    | 16.9%   |
| 75,000 - 99,999                              | 3,889               | 16.8         | 24,867        | 13.3            | 428,486    | 13.5%   |
| 100,000 - 149,999                            | 4,385               | 19.0         | 30,724        | 16.4            | 548,970    | 17.3%   |
| 150,000 - 199,999                            | 1,756               | 7.6          | 12,528        | 6.7             | 248,860    | 7.8%    |
| 200,000 +                                    | 1,136               | 4.9          | 9,848         | 5.3             | 262,009    | 8.2%    |

Source: U.S. Census Bureau, 2010 American Community Survey 5-year Estimates



|                                      | Gloucester Township 2014 Income Levels |               |            |
|--------------------------------------|----------------------------------------|---------------|------------|
|                                      | Gloucester Township                    | Camden County | New Jersey |
| Median Household Income              | \$72,699                               | \$61,842      | \$69,811   |
| Median Family Income                 | \$84,642                               | \$76,671      | \$84,904   |
| Poverty Status (Percent of people)   | 8.0%                                   | 13%           | 9.1        |
| Poverty Status (Percent of families) | 6.1%                                   | 10.4%         | 6.7        |

Source: U.S. Census Bureau, 2010 American Community Survey 5-year Estimates

## 7. Employment Status of Residents

Of the 51,481 estimated residents aged sixteen and over in 2014, 36,513 were in the labor force (70.9%). Just under 9.5 percent of the labor force was listed as unemployed in the 2014 ACS. The mean travel time to work for Township residents is 30.9 minutes.

The employment data included in the US Census for the Gloucester Township residents provides a picture of what types of work Township residents are involved in, but does not indicate where those jobs are located. As indicated in the table below, the most significant employment activities of the employed residents are Educational, Health and Social Services with 24.7%, followed by retail trade with 12.6% and Professional, Scientific, Management, Administrative, and Waste Management Services with 11.3%.

| Industry Code                               | Gloucester |      |
|---------------------------------------------|------------|------|
|                                             | Jobs       | %    |
| 1 Agriculture, Forestry, Fisheries & Mining | 22         | 0.1  |
| 2 Construction                              | 2,073      | 6.3  |
| 3 Manufacturing                             | 1,784      | 5.4  |
| 4 Wholesale Trade                           | 1,005      | 3.0  |
| 5 Retail Trade                              | 4,163      | 12.6 |
| 6 Transportation, Warehousing, Utilities    | 2,392      | 7.3  |
| 7 Information                               | 736        | 2.2  |
| 8 Finance, Insurance, Real Estate, Rental   | 2,459      | 7.5  |
| 9 Prof., Sci., Mgmt., Admin Services        | 3,728      | 11.3 |
| 10 Educ. Health, Social Services            | 8,152      | 24.7 |
| 11 Arts, Entertainment, Recreation, Food    | 2,937      | 8.9  |
| 12 Other Services                           | 1,620      | 4.9  |
| 13 Public Administration                    | 1,916      | 5.8  |

Source: U.S. Census Bureau, 2010 American Community Survey 5-year

| Occupation of Gloucester Residents            |               |            |                 |
|-----------------------------------------------|---------------|------------|-----------------|
|                                               | # Persons     | % GT       | % Camden County |
| Management, Professional. & Related           | 12,894        | 39.1       | 38.4            |
| Service                                       | 5,292         | 16.0       | 17.3            |
| Sales and Office                              | 9,383         | 28.4       | 26.3            |
| Natural resources, Construction & Maintenance | 2,655         | 8.0        | 7.1             |
| Production, Transp. & Material Moving         | 2,763         | 8.4        | 10.9            |
| <b>Total</b>                                  | <b>32,987</b> | <b>100</b> | <b>100</b>      |

Source: U.S. Census Bureau, 2010 American Community Survey 5-year

## C. EMPLOYMENT

*An analysis of the existing and probable future employment characteristics of the municipality.*

### 1. Local In-Place Employment

New Jersey's Department of Labor and Workforce Development is the organization that reports on employment and wages within the state. The latest municipal level report was completed in 2014. According to the data, there were an annual average of 5,438 private sector jobs within Gloucester Township.

The manufacturing sector was the largest employer in the Township, providing an average of 965 jobs. The local government sector provides another 2,927 jobs in the Township. The table above breaks down the data on each industry sector, although these are the jobs that the residents of the Township have, these are not necessarily located within the Township.

### 2. Employment Trends and Outlook

The Delaware Valley Regional Planning Commission publishes employment projections. Employment in Gloucester Township is expected to rise through 2040, with a 7.6% increase.

| Gloucester Township, DVRPC Projected Employment |        |        |        |        |        |        |        |                |          |
|-------------------------------------------------|--------|--------|--------|--------|--------|--------|--------|----------------|----------|
| Year                                            | 2010   | 2015   | 2020   | 2025   | 2030   | 2035   | 2040   | Change 2005-35 | % change |
| Projected Employment                            | 17,277 | 17,339 | 17,517 | 17,935 | 18,352 | 18,530 | 18,592 | 1,315          | 7.6%     |

Source: DVRPC 2040 Employment Forecasts, 2010-2040

## D. PROJECTED HOUSING STOCK

*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;*

Residential growth in Gloucester has decreased since 2000. Since 2007 through 2014, growth has dropped off steeply.

| Historic Trend of Certificates of Occupancy and Demolition Permits |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |
|--------------------------------------------------------------------|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|
|                                                                    | '00 | '01 | '02 | '03 | '04 | '05 | '06 | '07 | '08 | '09 | '10 | '11 | '12 | '13 | '14 |
| COs Issued                                                         | 256 | 272 | 132 | 156 | 206 | 134 | 143 | 28  | 10  | 4   | 13  | 1   | 1   | 1   | 0   |
| Demolitions                                                        | 4   | 4   | 7   | 5   | 4   | 2   | 0   | 1   | 0   | 0   | 0   | 0   | 0   | 0   | 0   |
| Net                                                                | 252 | 268 | 125 | 151 | 202 | 132 | 143 | 27  | 10  | 4   | 13  | 1   | 1   | 1   | 0   |

Source: New Jersey Construction Reporter and Municipal construction office records

## E. FAIR SHARE OBLIGATION

*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.*

### 1. Land Capacity

All portions of Gloucester Township are located in State Planning Area 1, with the exception of the County's Lakeland Complex, on the border with Washington and Deptford Townships in Gloucester County. The Lakeland Complex is in Planning Area 2.

### 2. Availability of Existing and Planned Infrastructure

Water and sewer infrastructure as well as other utilities such as potable water and natural gas services are readily available in the Township.

### 3. Appropriate Location for Affordable Housing

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

Existing structures appropriate for conversion to affordable housing include homes in foreclosure, which could be cost effective to purchase and convert to affordable housing.

As for structures suitable for rehabilitation, according to the Fair Share Housing Center there are 57 homes within the Township that are in need of a major system replacement (roof, electrical, plumbing, etc.)

### **III. Gloucester Township's Fair Share Plan**

#### **A. FAIR SHARE OBLIGATION**

##### **1. Contents of a Fair Share Plan**

The Fair Share Plan contains the following information:

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

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

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

##### **2. Regional Income Limits**

Dwelling units are affordable to low and moderate income households if the maximum sales price or rental cost is within their ability to pay such costs, based on a specific formula. The State provides income limits based upon the median gross household income of the affordable housing region in which the household is located. A moderate income household is one with a gross household income equal to or more than 50%, but less than 80%, of the median gross regional household income. A low income household is one with a gross household income equal to 50% or less of the median gross regional household income. Very-low income households are those with a gross household income equal to 30% or less of the median gross household income. Gloucester Township is located in Region 5, which contains Burlington, Camden and Gloucester Counties.

Using the 2014 regional income limits, a four-person household moderate income is capped at \$65,200. Two-person households could make up to \$52,160 and be considered a moderate income household or earn up to \$32,600 and be considered a low income household. See the table on the following page for greater detail.

| 2014 REGIONAL INCOME LIMITS FOR REGION 5 |             |             |             |             |
|------------------------------------------|-------------|-------------|-------------|-------------|
|                                          | 1 Person    | 2 Person    | 3 Person    | 4 Person    |
| Median                                   | \$57,050.00 | \$65,200.00 | \$65,200.00 | \$81,500.00 |
| Moderate                                 | \$45,640.00 | \$52,160.00 | \$52,160.00 | \$65,200.00 |
| Low                                      | \$28,525.00 | \$32,600.00 | \$32,600.00 | \$40,750.00 |
| Very Low                                 | \$17,115.00 | \$19,560.00 | \$19,560.00 | \$24,450.00 |

Source: [http://nj.gov/dca/services/lps/hss/admin\\_files/incomelimits.pdf](http://nj.gov/dca/services/lps/hss/admin_files/incomelimits.pdf)

## 1. Affordable Housing Obligations

The three components that must be addressed by this plan are (1) its rehabilitation share, (2) the prior round obligation and (3) projected or prospective third round obligation.

| Gloucester Township<br>Affordable Housing Obligations<br>as outlined in ECONSULT SOLUTIONS May 16, 2016 Report |     |
|----------------------------------------------------------------------------------------------------------------|-----|
| Rehabilitation (Present Need)                                                                                  | 117 |
| Prior Round (1987 – 1999)                                                                                      | 359 |
| Third Round (Prospective Need 2015-2025)                                                                       | 120 |

| Gloucester Township<br>Affordable Housing Obligations<br>as outlined in Fair Share Housing's Report dated July, 2016 |       |
|----------------------------------------------------------------------------------------------------------------------|-------|
| Rehabilitation (Present Need)                                                                                        | 135   |
| Prior Round (1987 – 1999)                                                                                            | 359   |
| Third Round (Prospective Need 1999-2025)                                                                             | 1,449 |

## **B. FAIR SHARE PLAN**

The Township of Gloucester's Fair Share Plan proposes to meet its affordable housing obligations as follows:

### **1. Rehabilitation Obligation and Proposed Mechanisms**

The Opinion issued by the Supreme Court of New Jersey on March 10, 2015 states that "the Appellate Division also approved a methodology for identifying substandard housing that used fewer surrogates [or indicators] to approximate the number of deficient or dilapidated housing units". The Order states that three indicators was not an abuse of discretion. The three indicators utilized are old and over-crowded units, homes with incomplete plumbing and housing units with incomplete kitchens.

The Township has relied upon the calculations as determined by the Fair Share Housing Center settlement agreement of 1,014 (30% of 1,449). The table below shows how the Rehabilitation Obligation was calculated by our expert. Fair Share Housing estimates the Township's rehabilitation requirement to be 135.

N.J.A.C. 5:93-5.2(g) and (h) requires \$10,000 to be spent per unit and a six-year control on affordability for owner-occupied units Rental units are required to have ten-year controls on affordability. Additionally a major system must be repaired in order for a home to qualify as a credit. Section II of this report indicates the condition of houses from the most recently available census data.

Gloucester Township's prior round three plan (2008) identified 89 units that have been rehabilitated, leaving a balance of 28 units in need of rehabilitation. The current, Present Need rehabilitation number is 135 and will be addressed through funds in the Affordable Housing Trust Fund, or as an alternative, through participation in Camden County's rehabilitation program, which is administered with the use of CDBG and HOME funds.

- 1 The rules specifically require a minimum of \$2,000 per unit to be spent on administration and \$8,000 per unit to be spent on the rehabilitation activity, which totals at least \$10,000.
- 2 A major system is defined by N.J.A.C. 5:93-5.2(b) as weatherization, a roof, plumbing (including wells), heating, electricity, sanitary plumbing (including septic systems) and/or a load bearing structural system.

## **2. Prior Round Obligation and Proposed Mechanisms**

The Township of Gloucester previously received certification from COAH for its first and second round fair share plan and it has satisfied its 359 unit obligation from those rounds as follows:

1. Quail Ridge, an affordable family rental development with 40 units. A potential of 40 bonus credits will be utilized.
2. Revere Run, an affordable for-sale family development with 37 units.
3. Brittany Woods, an affordable family rental development with 29 units, and 29 bonus credits.
4. Valley Stream, an affordable for-sale development with 8 units.
5. Revere Run III has been constructed to be a 100% municipally sponsored family rental affordable housing project. 79 townhouse units are located within this development. A potential of 79 bonus credits exist for this site.
6. Gloucester Township Housing Authority Senior Campus I (Camden County Lakeland Campus Redevelopment) is an existing senior rental complex with 75 units.
7. 2 of the 24 units in the Multiple Sclerosis Association of America (MSAA) supportive housing facility. A potential bonus of 5 units is possible.

The total units from these development equal 270, 89 bonus credits from the family rental units. Two (2) units of the 24 units from MSAA will be utilized to reach the 359 unit obligation. The remaining MSSA units and bonuses are being carried over to Round III. All of these developments have already been constructed and approved by COAH.



### 3. Third Round Obligation (Prospective Need 1999-2025) and proposed mechanisms

As a result of mediation with the Court and Fair Share Housing, The Township has elected to utilize the following as the Township's affordable housing obligation:

| Gloucester Township<br>Affordable Housing Obligations |                               |
|-------------------------------------------------------|-------------------------------|
| Rehabilitation (Present Need)                         | 135 (Kinsey July 2016 report) |
| Prior Round (1987 – 1999)                             | 359                           |
| Third Round (Prospective Need 1999-2025)              | 1,014 (70% of 1,449)          |

Subject to its case management outcome, the Township reserves the right to revise the plan as proposed herein if it is determined by the Court that their unmet need including their third round obligation does not warrant the inclusionary housing numbers as submitted herein. The Township likewise reserves the right to request a vacant land adjustment should its case management via the Court's determine that it has a different 3rd Round obligation.

The Township has the following 648 affordable housing credits to apply to the Round 3 obligation, with the potential for 253 (25 % of 1014) bonus credits:

1. Franklin Square Senior Village, an affordable senior rental development with 224 units. A potential of 73 bonus credits are available. ( $.33 \times 224 = 73$ )
2. Scenic Falls is a family rental development that has been constructed with 99 units. 99 bonus credits are available from this development.
3. Camden County Lakeland Complex Redevelopment, Phases II and III are approved but not yet built. This approved project included 150 senior rental units. The Township is proposing to allow for 100% supportive veteran housing on this location. This will tap into the other veteran housing communities within the Township and provide a valuable asset to the Township and its residents. This location is optimal for supportive housing because of its location within the County Health Complex. The Township will adopt a resolution of intent to bond in accordance with COAH's rule 5:93. The veteran community will include 20 very low income units and a potential of 150 bonus credits would be available, however they may not all be taken for Round Three. Appendix 5 contains the resolution of intent to bond.
4. Blackwood West (Southwind) Redevelopment Area is an approved but not yet built development with 100 family rental housing units. This approval is an inclusive 495 unit apartment/townhouse development. This was part of a court settlement agreement, Hill Creek, LLC vs. The Township of Gloucester and the Planning Board of the Township of Gloucester. The redevelopment plan court order for this project is attached in Appendix 6. The redevelopment plan will be amended to reflect the court order as it relates to the specific tract "Mingus Tract". Thirteen (13) of the units will be very low income units. 100 potential bonus credits are available. The redevelopment plan amendment ordinance draft is located in Appendix 7.



5. The remaining 22 of the 24 units in the Multiple Sclerosis Association of America (MSAA) supportive housing facility. A potential bonus of 7 units is possible.
6. Block 8401 Lot 12.02 (1495 Chews Landing Road ) will be developed as an Inclusionary Apartment overlay zone, allowing for a maximum of 72 units (14 du/acre) with a 15% required affordable housing set aside. The zoning overlay would allow for a three story (with elevator) multi-family apartment complex. A zoning overlay will be adopted by the Township. This would create 11 affordable family rental units. A potential bonus of 3 may be utilized ( $.33 \times 11 = 3.63$ ). The apartment complex will include 1 very low income unit ( $.13 \times 11 = 1.43$ ). The proposed zoning map, concept plan and overlay ordinance is included in Appendix 2.

Gloucester Township has adopted the Neighborhood Rehabilitation Program, a Market to Affordable Program administered by the Gloucester Township Housing Authority to meet any deficit of the Round III obligation. This has been utilized via the NJ Abandoned Properties Rehabilitation Act, N.J.S.A. 55:19-78 et seq. The Township Code, as amended, will now allow the Township to identify abandoned properties, acquire them through a summary action, and develop a rehabilitation plan (together with the Housing Authority). The Township has many market rate apartments in the Borough that would be available for this program. The Gloucester Township Housing Authority (GTHA) will administer the program. To administer the program, the GTHA would prepare a list of all owners of market rate apartments in Gloucester Township together with the range of rents; prioritize the apartment owners who should initially be contacted about participation in the program; negotiate the buy-down subsidy that would result in each apartment being deed restricted for 30 years, with income eligible tenants and a regulated rent and insure that no more than 20 percent of the apartments in each complex are deed restricted. Funds from the Affordable Housing Trust Fund would go toward this program.

The Township is working with the Housing Authority to coordinate an implementation schedule detailing the 174 affordable units that will be acquired and made affordable throughout Round 3. This schedule will be prepared within 9 months of the fairness hearing held by the Court in which the settlement agreement with FSHC is approved. The draft ordinance is located in Appendix 3. After said 9 month period is completed, the Township agrees to develop 15 properties by the end of a twelve month period starting on the day the Court issues an order approving the settlement agreement. After this, the number of units rehabilitated will increase through 2025. By the end of a twenty-four month period, starting on the day the Court issues an order approving the settlement agreement, a total of 45 units will be provided. A full implementation schedule through 2025 will be provided after the 9 month period of preparing for implementation of the program for the Housing Authority. This implementation schedule will also address how the very low, low, and moderate income housing obligations and bedroom distribution requirements will be satisfied through this program, recognizing that half of the units provided through this program must be for low-income households and 13-percent of the units must be affordable to very low income households. At a minimum, the implementation schedule will demonstrate that half of all 174 units required under this program will be made available to lower-income households by July 1, 2020, with the remainder to be made available to lower-income