

Highlands Plan Conformance
Module 3 – Housing Element and Fair Share Plan Submission requirements for

Introduction

Tewksbury Township includes lands in both the Preservation Area and Planning Area of the Highlands Region. The Township has prepared and adopted a Third Round Housing and Fair Share Plan as part of COAH’s initial Third Round regulations, but has not been revised to reflect the changing regulatory requirements of COAH or the Highlands Conformance provisions since the Township’s initial Third Round submission.

The capacity analysis conducted by the Highlands Council for Modules 1 and 2 of Plan Conformance identify 371 new residential units can be constructed under the Highlands Regional Master Plan and Highlands Act regulations and no new non-residential growth. Of these 371 new units, 13 are in the Preservation Area and 358 are in the Planning Area. In addition there still exists the opportunity for development through redevelopment and exemptions. The following information is being submitted as part of the requirements for the Plan Conformance Grant deadline of December 8, 2009. The Township will continue to refine and determine the regional affordable housing obligation as Tewksbury works toward full Plan Conformance and the June 8, 2010 deadline for the submission of the Housing and Fair Share Plan.

A. Summary of Housing Obligations

i. Prior Round Obligation

Tewksbury Township has a prior round obligation of 119 new construction units. This figure was part of the revised Third Round rules released June 2nd, 2008.

ii. Highlands RMP Adjusted Growth Projections

The Township utilized COAH’s Workbook D, which calculated Actual and Projected Growth using COAH and Highlands Projections (see attached).

- COAH Third Round Projected Growth Share Obligation: 102 Affordable Units
- RMP Adjusted Projected Growth Share Obligation 58 Affordable Units
- Tewksbury Township Actual Growth 2004-2008: 24 Affordable Units

COAH’s projections (N.J.A.C. 5:97-1 et seq.) identify a third round growth share obligation of 102 new affordable units for Tewksbury (including the 24-unit third round actual need). When added to the prior cycle need of 119 affordable units, Tewksbury’s total projected new construction “fair share” obligation is **221 affordable units for the combined third round and prior round obligation**. Note that this calculation includes the actual third round obligation that has accrued to date, which totals 24 units. **Tewksbury has satisfied the prior round obligation of 119 units.**

According to Workbook D, the **adjusted affordable housing obligation utilizing the Highlands RMP buildout is 58 units**. This is derived from prospective residential buildout of 157 units ($157 / 5 = 31.4$ affordable units); plus the actual third round residential obligation of 24.2 affordable units; plus the actual third round nonresidential obligation of 2.5 affordable units ($31.4 + 24.2 + 2.5 = 58.1$). Added to the prior cycle obligation of 119 units, **Tewksbury's total projected, Highlands-adjusted new construction "fair share" is 177.1 (177) affordable units for the combined third round and prior round obligation. The Township has satisfied its prior round obligation leaving an affordable obligation of 58.1 for the Highlands RMP.** Note that in this projection, the actual 24.2 affordable unit 2004-2008 third round new construction affordable housing obligation is added to the Highlands-adjusted affordable unit obligation. This is because the Highlands buildout growth share obligation is calculated prospectively from 2008, and does not include the 28 unit obligation associated with the actual certificates of occupancy issued between 2004 and 2008.

It appears that the calculation required in Workbook D may include a requirement to add the existing actual third round obligation to the Appendix D third round projection, which is incorrect. The above-cited estimates are based upon the application of N.J.A.C. 5:97 methodology and COAH's projections found at Appendix D; and the Highlands Buildout projections found in Module 2, which are the basis for calculating a Highlands-adjusted third round obligation. As indicated above, there may be inconsistencies in the methodology applied to calculating these projections in Appendix D. As a result, the Township intends to review the information provided in Workbook D with Highlands Staff following submission of this petition for Basic Plan Conformance, and before development of the Township's Third Round Housing Plan Element and Fair Share Plan for a petition to COAH for Third Round Substantive Certification in accordance with the June 8, 2010 petitioning date.

B. Summary and Consistency Review of Proposed Prior Round Sites

The Township does not have any certified second round sites.

C. Housing Partnership Program

The Township is interested in investigating the possibility of sending a substantial portion of its affordable housing obligation to a Highlands Region receiving municipality through the Highlands Regional Affordable Housing Development Planning Program (RAHDPP). The Township includes both the Preservation Area and Planning Area with and has no designated sewer service areas. New construction affordable housing production will be dependent upon individual on site septic systems in Tewksbury Township, which is a limiting factor in the effective and cost-efficient production of affordable housing. As a result, affordable housing opportunities is expected to be primarily limited in Tewksbury Township to special needs supportive housing, market to affordable housing, accessory apartments and other innovative development techniques. While these techniques are valuable components of affordable housing of the regional affordable housing inventory, Tewksbury Township wishes to send as many affordable units of its third round affordable housing obligation as possible under the RAHDPP. One major obstacle to the program for the Township is the \$80,000 per unit.

Current housing trust funds are insufficient to pay these anticipated costs for participation in the RAHDPP. More information will be needed to make an informed decision by the Township, but items such as funding, cost per unit and administration of such units will have to be further analyzed.

Summary of Adjusted Growth Share Projection Based On Land Capacity
(Introduction to Workbook D)

Municipality Code:

Municipality Name:

[Muni Code Lookup](#)

This workbook is to be used for determining the projected Municipal Growth Share Obligation by comparing growth projected by COAH with actual growth based on certificates of occupancy that have been issued from 2004 through 2008 and the RMP build-out analysis conducted under Module 2 of the Highlands RMP conformance process. Data must be entered via the "tabs" found at the bottom of this spreadsheet which may also be accessed through the highlighted links found throughout the spreadsheet. This workbook consists of five worksheets that, when combined on this introduction page, provide a tool that allows the user to enter exclusions permitted by N.J.A.C. 5:97-2.4 to determine the projected Growth Share Obligation. COAH-generated Growth Projections included in Appendix F(2) of the revised Third Round Rules, Highlands Council build-out figures based on Mod 2 Reports and actual growth based on COs as published by the DCA Division of Codes and Standards in The Construction Reporter are imported automatically upon entry of the Municipal Code.

[Click Here to enter COAH and Highlands Council data](#)

Municipalities seeking to request a revision to the COAH-generated growth projections based on opting in to the Highlands RMP may do so by providing this comparative analysis of COAH and RMP build-out projections. After completing this analysis, the growth projections may be revised based on the Highlands RMP build-out analysis. Actual growth must first be determined using the Actual Growth worksheet. The RMP adjustment applies only to RMP capacity limitations that are applied to growth projected from 2009 through 2018.

[Click Here to Enter Actual Growth to Date](#)

[Click Here to Enter Permitted Exclusions](#)

[Click Here to View Detailed Results from Analysis](#)

Summary Of Worksheet Comparison

	COAH Projected Growth Share	Growth Share Based on Highlands RMP
Residential Growth	308	412
Residential Exclusions	0	0
Net Residential Growth	308	412
Residential Growth Share	61.60	82.40
Non-Residential Growth	651	40
Non-Residential Exclusions	0	0
Net Non- Residential Growth	651	40
Non-Residential Growth Share	40.69	2.48
Total Growth Share	102	85

The Highlands RMP analysis results in a revision to the COAH-generated growth projection. Tewksbury Township may file this Workbook and use a Residential Growth Share of 82.4 plus a Non-residential Growth Share of 2.48 for a total Highlands Adjusted Growth Share Obligation of 85 affordable units

Growth Projection Adjustment - Actual Growth

Actual Growth 01/01/04 to 12/31/08

Municipality Name: Tewksbury Township

Residential COs Issued

As Published by D C S	121
Per Municipal Records (if different)	121
Qualified Residential Demolitions	

Note: To **qualify** as an offsetting residential demolition, the unit must be the primary residence of the household for which the demolition permit has been issued, it had to be occupied by that owner for at least one year prior to the issuance of the demolition permit, it has to continue to be occupied by that household after the re-build and there can be no change in use associated with the property. (See [N.J.A.C. 5:97-2.5\(a\)1.v.](#)) A Certification Form must be completed and submitted for each qualifying demolition.

[Get Demolition Certification Form](#)

Non-residential CO's by Use Group	Square Feet Added (COs Issued) As Published by D C S	Square Feet Added (COs Issued) per Municipal Records (if different)	Square Feet Lost Demolition Permits Issued)	Jobs Per 1,000 SF	Total Jobs
B	8,281	8,281		2.8	23.19
M	0	0		1.7	0.00
F	0	0		1.2	0.00
S	10,464	10,464		1.0	10.46
H	0	0		1.6	0.00
A1	0	0		1.6	0.00
A2	0	0		3.2	0.00
A3	0	0		1.6	0.00
A4	0	0		3.4	0.00
A5	0	0		2.6	0.00
E	0	0		0.0	0.00
I	0	0		2.6	0.00
R1	0	0		1.7	0.00
Total	18,745	18,745	0		33.65

[Return to Main Page \(Workbook D Intro\)](#)

[Proceed to COAH Data and RMP Module 2 Build-out Data](#)

[Proceed to Exclusions Tab](#)

Affordable and Market-Rate Units Excluded from Growth

Municipality Name: Tewksbury Township

Prior Round Affordable Units NOT included in Inclusionary Developments Built Post 1/1/04

Development Type	Number of COs Issued and/or Projected
Supportive/Special Needs Housing	
Accessory Apartments	
Municipally Sponsored and 100% Affordable	
Assisted Living	
Other	
Total	0

Market and Affordable Units in Prior Round Inclusionary Development Built post 1/1/04

N.J.A.C. 5:97-2.4(a)

(Enter Y for yes in Rental column if affordable units are rentals)

Development Name	Rentals? (Y/N)	Total Units	Market Units	Affordable Units	Market Units Excluded
		0			0
		0			0
		0			0
		0			0
		0			0
Total		0	0	0	0

Jobs and Affordable Units Built as a result of post 1/1/04 Non-Residential Development

N.J.A.C. 5:97-2.4(b)

Development Name	Affordable Units Provided	Permitted Jobs Exclusion
		0
		0
		0
		0
Total	0	0

[Return to Main Page \(Workbook D Intro\)](#)

[Return to COAH Data and RMP Module 2 Build-out Data](#)

[Return to Actual Growth](#)

[View Detailed Results from Analysis](#)

COAH Growth Projections and Highlands Buildout Data

Must be used in all submissions

Municipality Name: Tewksbury Township

The COAH columns have automatically been populated with growth projections from Appendix F(2) found at the back of N.J.A.C. 5:97-1 et seq. The Highlands RMP Build-out columns have automatically been populated with residential and non-residential build-out figures from the municipal build-out results with resource and utility constraints found in Table 4 of the RMP Module 2 report. Always check with the Highlands Council for updates. If figures have been updated, enter updated build-out results. Use the Tabs at the bottom of this page or the links within the page to toggle to the exclusions worksheet of this workbook. After entering all relevant exclusions, toggle back to the introduction page to view the growth share obligation that has been calculated based on each approach.

COAH Projections

From Appendix F(2) found at the back of N.J.A.C. 5:97-1 et seq.
Allocating Growth To Municipalities

Residential	Non-Residential
308	651

Highlands RMP Buildout Analysis

From Module 2
Table 4 – Municipal Build-Out Results With Resource and Utility Constraints
Updated as of October 2, 2009

	Preservation Area	Planning Area	Totals
Residential units – Sewered	<input style="width: 50px; height: 20px;" type="text" value="0"/>	<input style="width: 50px; height: 20px;" type="text" value="0"/>	0
Septic System Yield	<input style="width: 50px; height: 20px;" type="text" value="32"/>	<input style="width: 50px; height: 20px;" type="text" value="259"/>	291
Total Residential Units	32	259	291
Non-Residential Jobs – Sewered	<input style="width: 50px; height: 20px;" type="text" value="0"/>	<input style="width: 50px; height: 20px;" type="text" value="6"/>	6

Note: Always check with the Highlands Council for updated municipal Build-out numbers. Enter build-out figures in the appropriate boxes only if revised figures have been provided by the Highlands Council.

[Click Here to link to current Mod 2 Build-Out Reports](#)

[Proceed to Enter Prior Round Exclusions](#)
[Retrun to Enter Actual Growth](#)
[Return to Main Page \(Workbook D Intro\)](#)

Comparative Analysis Detail For Tewksbury Township

The following chart applies the exclusions permitted pursuant to N.J.A.C 5:97-2.4 to both the COAH growth projections and the projected growth that results from the Highlands RMP build-out analysis plus actual growth for the period January 1, 2004 through December 31, 2008.

	COAH		Highlands	
	Residential	Non-Residential	Residential	Non-Residential
Projected Growth From COAH Appendix F(2)	308	651		
Residential Exclusions per 5:97-2.4(a) from "Exclusions" tab COs for prior round affordable units built or projected to be built				
Inclusionary Development Supportive/Special Needs Housing	0		0	
Accessory Apartments Municipally Sponsored or 100% Affordable	0		0	
Assisted Living	0		0	
Other	0		0	
Market Units in Prior Round Inclusionary development built post 1/1/04	0		0	
Subtract the following Non-Residential Exclusions per 5:97-2.4(b) from "Exclusions" tab				
Affordable units	0		0	
Associated Jobs		0		0
Net Growth Projection	308	651	412	40
Projected Growth Share (Residential divided by 5 and jobs divided by 16)	61.60	40.69	82.40	2.48
Total Projected Growth Share Obligation		102 Affordable Units		85 Affordable Units

[Return to Main Page \(Workbook D Intro\)](#)
[Return to COAH Data and RMP Module 2 Build-out Data](#)
[Return to Actual Growth](#)
[Return to Exclusions](#)