Stratford Borough
Midpoint Review Report
October 2020, updated May 2021

Purpose of the Midpoint Review Report

Stratford Borough's Settlement Agreement with Fair Share Housing Center ("FSHC") requires that the Borough comply with the statutory midpoint review requirements of the Fair Housing Act ("FHA") and specifically N.J.S.A. 52:27D-313, which provides in relevant part: "[t]he Council shall establish procedures for a realistic opportunity review at the midpoint of the certification period and shall provide for notice to the public." Pursuant to the Borough's Settlement Agreement with FSHC, that review requires the Borough to post on its website, with a copy to FSHC, a status report as to the implementation of the plan and an analysis of whether or not unbuilt sites/unfulfilled mechanisms continue to present a realistic opportunity and whether mechanisms to meet unmet need should be revised or supplemented.

Background

In 2015, Stratford Borough filed a Declaratory Judgment Action seeking a declaration of its compliance with the Mount Laurel doctrine and Fair Housing Act of 1985, N.J.S.A. 52:270-301 et seq. The matter has proceeded as a declaratory judgment action in accordance with In re N.J.A.C. 5:96 and 5:97, supra. Through the declaratory judgment process, the Borough and FSHC agreed to settle the litigation and to present that settlement to the trial court with jurisdiction over the matter to review, recognizing that the settlement of Mount Laurel litigation is favored because it avoids delays and the expense of trial, and results more quickly in the construction or provision of homes for lower income households.

The Borough entered into a Settlement Agreement with FSHC on November 9, 2016; which was approved by Order of the Court dated December 22, 2016, after the required Fairness and Compliance Hearing (held on November 18, 2016). There is no court appointed special master in this case. The Court approved the settlement agreement subject to the Borough's satisfaction and compliance with all of the terms and conditions of the Settlement Agreement. Per the Order, a final judgement of compliance and the judicial equivalent of substantive certification were entered in favor of Stratford Borough for its Third Round Affordable Housing obligation through July 2025. The Borough and the Joint Land Use Board were granted continued immunity from Mount Laurel lawsuits through July 2025.

The Planning Board adopted a Housing Element and Fair Share Plan on January 7, 2016 and adopted a revised Housing Element and Fair Share Plan in December 2016. The Borough has prepared implementing ordinances and redevelopment plans to enable the proposed inclusionary developments and to ensure that units are marketed and administered as required.

Rehabilitation Program Update

Stratford Borough has a Rehabilitation Obligation of 24 units. Residents of the Borough are eligible to apply for assistance through the Camden County Improvement Authority's Housing Improvement Program. The Borough's rehabilitation obligation will be satisfied through participation in the County program. Since 2018, 5 units in Stratford have been rehabilitated using the program. The Camden County Improvement Authority is gathering information about the

number of units that were rehabilitated in Stratford between 2010 and 2017. Availability of the program is advertised on the Borough's website.

Satisfaction of the Realistic Development Potential (RDP)

The Borough's RDP is 22 units. The RDP is to be satisfied through inclusionary zoning for multi-family rental units. The Borough has made the following progress toward addressing its RDP.

Mechanism	Description	Ordinance Adopted	Status	Notes/Additional Information
R-4 Inclusionary Zoning Block 62 Lot 8	17 units plus 5 rental bonus	May 11, 2021	Development incomplete	13% of affordable units will be very low income

The 6.9-acre tract has frontage along Route 30 (White Horse Pike) and is adjacent to the Whitehall Apartments. This vacant parcel may accommodate multi-family housing at a density of 16 dwelling units per acre. It is anticipated that the site will yield a total of up to 110 units, with 17 income restricted affordable housing units (15% of 110). Five (5) rental bonus credits will then be applied to satisfy the RDP.

Unmet Need Analysis

The Borough's unmet need is 139 units. The Fair Share Settlement Agreement and the Housing Element and Fair Share Plan anticipate the redevelopment of two largely vacant shopping center sites that were designated as Areas in Need of Redevelopment in 2011. These two sites are known as the Laurel Mills site and the Juster/Bradlees site. The Fair Share Plan proposed to amend the Redevelopment Plan for each of the sites to enable mixed use redevelopment that would include residential and commercial components.

Since the adoption of the Fair Share Plan in December 2016, two other affordable housing opportunities arose. The Borough has worked with the potential developers to ensure the inclusion of affordable housing to further satisfy unmet need. One of the sites is an inclusionary for-sale townhouse development and the other is supportive and special needs rental housing for veterans. The sites are included in the table below.

Mechanism	Site Name	Location/ Block and Lot	Inclusionary Redevelopment Plan Adoption	Projected # of Affordable Units	Notes/Additional Information
Redevelopment-Inclusionary Zoning	Laurel Mills	Block 116 Lots 14, 14.04	Redev Plan Ordinance 2017:11	16 affordable (80 total units)	Subdivision and Site Plan approved October 24, 2019, Resolution 2019-06
Redevelopment-Inclusionary Zoning	Juster/ Bradlees	Block 62 Lots 2, 4, 7, 18	Redev Plan Ordinance 2018:02	43 to 48 affordable (216 to 240 total units)	Redev Plan initially adopted by Ordinance 2016-16. Amended for Fair Share compliance in 2018.

Redvelopment-Inclusionary Zoning	Berlin Road	Block 53 Lots 1-6 110 Berlin Road	Redev Plan Ordinance 2019:20	8 affordable (49 total units)	Subdivision and Site Plan approved September 24, 2020
100% Affordable Supportive and Special Needs	Veterans Village of Camden County	Block 3 Lot 1 One Colby Ave	D variance granted March 22, 2018	20	Site Plan approved March 22, 2018

Very-Low Income Analysis

The 2016 Settlement Agreement requires that 13% of all units referenced in the Agreement constructed after July 1, 2008 shall be very-low income units. Half of the very low-income units must be available for families. The Borough is satisfying its very low-income requirement as follows. The affordable housing trust fund spending plan provides that developers may request a subsidy to offset the difference between a low-income unit and a very low-income unit (if and when funds are available).

Development	Very Low Units	Total Units	Percentage	Status
Juster/Bradlees	3	17	17%	Proposed
Laurel Mills	1	12	8%	Proposed
Juster Site	6	43	14%	Proposed
Berlin Road	1	8	13%	Proposed
Veterans Village	TBD	20	TBD	Proposed

In summary, with a total of 3 very low-income units out of the total of 17 units (plus 5 bonus) satisfying the Realistic Development Potential (RDP) and the potential for 11 very-low income units out of 83 units that are projected to satisfy unmet need; at least 13% of the affordable housing units produced in Stratford will be affordable to very low-income households.

Other Compliance Documents

1. Ordinance 2021:08 Amends the Affordable Housing Ordinance and updates the Mandatory Development Fee Ordinance
2. Resolution 2021:82 Appoints a Municipal Housing Liaison
3. Resolution 2021:83 Approves the Affordable Housing Trust Fund Spending Plan
4. Resolution 2021:84 Approves the Affirmative Fair Housing Marketing Plan