2015 MASTER PLAN AND DEVELOPMENT REGULATIONS REEXAMINATION REPORT FOR WESTAMPTON TOWNSHIP, BURLINGTON COUNTY

Introduction

The Municipal Land Use Law (MLUL) at N.J.S.A. 40:55D-89 includes the following statement relative to the periodic examination of a municipal Master Plan:

The governing body shall, at least every ten years, provide for a general reexamination of its master plan and development regulations by the planning board which shall prepare and adopt by resolution a report on the findings of such reexamination, a copy of which report and resolution shall be sent to the county planning board and the municipal clerk of each adjoining municipality.

As permitted under the Municipal Land Use Law, the Township has adopted several elements of the Master Plan. Among the elements and date of adoption are:

- Goals and Objectives November 5, 1997.
- Land Use Plan November 5, 1997.
- Open Space, Recreation and Farmland Preservation Plan July 1, 2009, revised to December 3, 2014.
- Circulation Plan May 2002
- Housing Element and Fair Share Plan December 3, 2014.
- Environmental Resource Inventory July 2010.
- Vision Statement 2010.
- Population and Housing Trends December 3, 2014.

In addition, as required by the MLUL, a Reexamination Report was adopted on September 6, 2006.

N.J.S.A 40:55D-89 identifies the following general areas for review in the Reexamination Report:

The reexamination report shall state:

- a. The major problems and objectives relating to land development in the municipality at the time of the adoption of the last reexamination report.
- b. The extent to which such problems and objectives have been reduced or have increased subsequent to such date.
- c. The extent to which there have been significant changes in the assumptions, policies and objectives forming the basis for the master plan or development

regulations as last revised, with particular regard to the density and distribution of population and land uses; housing conditions; circulation; conservation of natural resources; energy conservation; collection, disposition and recycling of designated recyclable materials; and changes in State, county and municipal policies and objectives.

- d. The specific changes recommended for the master plan or development regulations, if any, including underlying objectives, policies and standards, or whether a new plan or regulations should be prepared.
- e. The recommendations of the planning board concerning the incorporation of redevelopment plans adopted pursuant to the "Local Redevelopment and Housing Law", P.L. 1992, c.79 (C.40A:12A-1 et al.) into the land use plan element of the municipal master plan, and recommended changes, if any, in the local development regulations necessary to effectuate the redevelopment plans of the municipality.

The following sections of this report address each of the categories outlined above.

Major Problems and Objectives Relating to Land Development at the Time of Adoption of the Last Reexamination Report

The major problems and objectives in the 2006 Reexamination Report primarily involve the New Jersey Council on Affordable Housing (COAH). As in previous Reexamination Reports, the COAH Round 3 rules and regulations remain in limbo. The Courts have invalidated portions of the rules two times and neither the State nor the Courts have provided new rules. Although an obligation to provide affordable housing remains, the exact number of affordable units for which the Township must plan remains elusive.

The provision of affordable housing is also suffering from the decline in funding from State and Federal resources devoted to providing assistance with the production of affordable housing. Westampton has also been affected by a major reduction in locally generated affordable housing fees from two sources. First, a major decline in housing construction has severely limited the development fees generated. Secondly, although non-residential development has also declined, a larger problem is the State-wide mandate involving a moratorium on collecting non-residential development fees.

Compounding the affordable housing issue is the constant threat of a Builder's Remedy Suit where a developer, in exchange for a limited number of affordable units, gains a major increase in density for market-rate units. Although the Township is currently protected by Court Order, the Township's housing activity is subject to review by the Courts and if progress is not shown, the Courts could entertain a Builder's Remedy Suit.

Two additional State initiatives will also impact Township land use decisions. The first involves a reduction in potential sewer service areas throughout the State. This decision was based on the remoteness of much of the vacant land from existing development and sanitary sewer

infrastructure. In addition, much of the vacant land in sewer service areas is impacted by environmental constraints. Recognizing a need to protect environmental resources, open space and farmland while forwarding the State objective to concentrate new development in or adjacent to existing development, the NJDEP has adopted new State-wide sewer service area maps that have taken significant acreage out of potential sewer service areas. Westampton was impacted by having a portion of the northeast quadrant removed from a sewer service area. Newer septic standards will either require more expensive and extensive septic system designs or larger lot sizes in order to satisfy the standards.

The second State initiative involves the State Plan. A new Plan that is simpler and more easily incorporated into local plans has been drafted but not adopted. Instead of very specific and detailed goals, objectives and policies for five distinct planning areas, the draft Plan would contain broad goal and objective statements for guiding development into growth areas and away from areas targeted for protection. Local plans would be given the flexibility of developing more detailed objectives and policies to address the broader State goals.

The Extent to Which Such Problems and Objectives Have Been Reduced or Have Increased

The 2006 Reexamination Report made 14 recommendations for revisions to the Master Plan and Development Regulations. The recommendations were meant to address problems and objectives identified in the 2006 Report. The status of the 14 recommendations is as follows:

- 1. A Housing Element and Fair Share Plan was adopted by the Township in 2009. This Plan was approved by the Courts.
- 2. A revision to the Housing Element and Fair Share Plan was adopted in 2012. The purpose of the revision was to incorporate land use approvals for new
- 100% affordable housing developments. **COMPLETED**
- In 2014, two parcels were determined to be areas in need of redevelopment. The redevelopment plans specify multifamily housing as a permitted use. Block 401, Lots 2 and 8, have received preliminary site plan approval for a 100% affordable rental development while Block 902, Lots 1-3 will contain a market rate apartment development with some units reserved for affordable housing. Both sites were added to an amended Housing Element and Fair Share Plan adopted in December, 2014. **COMPLETED**
- 4. A continuing problem is landscaping and buffering between uses. Standards should be reviewed, revised or added to address the following specific issues:
 - a. Setback of improvements, including parking and service areas.
 - b. Berms: Where required and design elements.
 - c. Irrigation of landscaping and buffers.
 - d. Landscaping along main roads.

- e. Street shade tree standards.
- f. Buffer design standards.
- g. Increased buffer width for non-residential to residential uses. ONGOING
- 5. Property maintenance issues should be addressed. These issues include the condition of buildings, landscaping, parking and pedestrian areas, signage, etc. **OPEN ISSUE**
- 6. An ordinance revising Floor Area Ratio (FAR) standards for industrial and warehouse uses was adopted. **COMPLETED**
- 7. Costs and burdens associated with providing services to new residents and businesses are important issues. In this regard, all land use ordinances should be reviewed to ensure that requirements are current with State law and court decisions. The Land Development Board and the Township attorneys should be involved with this review. **ONGOING**
- 8. Based on concerns with severe flooding nationwide over the past several years, all Township environmental restrictions, including stream setbacks, should be reviewed and revised as required. **OPEN ISSUE**
- 9. Increasing demand for bike and walking facilities for both recreation and travel options should be addressed. All recreation requirements should be revised to ensure that Township goals and objectives are met. Installation of sidewalk is solely a County decision along County roads. However, the Township is able to influence the decisions with written policies and recommended conditions attached to development approvals. **ONGOING**
- 10. The sign ordinance has been amended to add standards and clarifying statements when a need has been established. **ONGOING**
- 11. Review uses, development standards and locations of the Office Research Zones.

 OPEN ISSUE
- 12. New technology, business practices and uses should be addressed. Standards for storage pods and other temporary storage structures were developed and adopted. **ONGOING**
- 13. Analysis of residential zones to determine current validity and the potential for consolidation. **OPEN ISSUE**
- 14. Traffic issues and Fair Share contribution issues should be reviewed. **OPEN ISSUE**
- 15. Encourage the use of "Westampton" in business names and advertising. **ONGOING**

The Extent to Which There Have Been Significant Changes in the Assumptions, Policies and Objectives Forming the Basis for the Master Plan or Development Regulations as Last Revised

The Township continues to be guided by the assumptions, policies and objectives that formed the basis for the Master Plan and Zoning, Subdivision and Site Plan Ordinances. However, there have been a number of significant planning activities and developments that have altered the assumptions, policies and objectives forming the basis for the Master Plan and Development Regulations as follows:

1. From a local perspective, the most important effort affecting land use planning was the Township's adoption of a Vision Plan and Statement in 2010. The Visioning Process included an outreach program that involved residents, property owners, local schools and the business community. The process sought to seek the input of stakeholders as to what they liked about the Township, things within the Township that could or should be improved, types of land uses and development patterns that were desirable, transportation choices, aesthetic concerns and issues and similar issues.

The end result of the process was the development of the Vision for Westampton with particular emphasis for Route 541 developing as a mixed-use center. The Vision Plan also developed a new set of land use goals and objectives that, although similar to, differ from the goals and objectives in the current Master Plan.

Although the Vision Plan was incorporated into the Master Plan, neither the Master Plan nor the implementing land use regulations have been revised. As a result, the Vision Plan is unlikely to be implemented although some of the goals, for example, greater pedestrian connectivity, have been attempted to be implemented through Land Development Board approvals for developments.

2. The second major element affecting land development within the Township has been the economic downturn over the past seven years. Although global and national in scope, the effects of the downturn have had a major, negative impact on development within Westampton. Both the pace of development and the types of developments have been impacted. The housing sector, in particular, has been hard-hit. New development applications, except for two affordable housing developments, have been non-existent over the past five years. Construction within the existing developments is only a fraction of the construction activity prior to the recession. Finally, there has been a significant reduction in both the value and the sale of existing homes.

The commercial sector has also experienced significant problems during the recession. Vacancies of existing space are up and new development proposals are down. Sites that have received land use approvals have not been developed.

Also suffering as a result of the recession is the office sector. Unlike the other land use sectors, the office sector is subject to a significantly overbuilt market, especially in the Burlington and the Camden County markets. As a result, vacancies are increasing and rents are decreasing, and there has been a major decrease in development proposals. Several large office developments with various levels of land use approvals within the region have not started construction. This sector is probably at least 10 years away from being able to absorb all of the vacant and approved, but unbuilt, office square footage.

3. A third major development that will impact the first two land use issues is related to the plans of Virtua Hospital for a medical campus centered on a new hospital along Route 541. In particular, Virtua has purchased Block 804, Lot 7, containing 109 acres on the south side of Route 541, generally across Route 541 from the recommended mixed-use center.

The Virtua plans have been made public only recently, after the Township developed its Vision Plan. The medical campus, seeking to take advantage of the excellent regional highway system, will be a game changer for the Township. The current trend in hospital development is to include a concentration of medical offices, clinics and labs, medically related retail and other types of health and fitness facilities in a planned office campus that surrounds and supports the hospital. Although the development of the campus will be a multi-year effort, the effect will be to reverse the poor regional office market, at least in terms of Westampton Township.

It is expected that the new hospital, planned medical campus and recommended mixed-use development along the north side of Route 541 will create both a strong regional identity and a destination for the Township.

4. The New Jersey Council on Affordable Housing (COAH) rules and regulations remain in limbo. Round 3 rules originally enacted in 2004 were struck down by the Courts. Revisions to the rules in an attempt to resolve the concerns of the Court have also been struck down. Although an obligation involving a specific number of affordable units for each Township remains elusive, Rounds 1 and 2 rules remain to guide the development of affordable housing.

Westampton has been granted an interim Round 3 protection by the Courts based on the Township's ongoing efforts to provide assistance for 100% affordable rental housing. Westampton has provided financial assistance to the Salt and Light as well as the Project Freedom organizations to provide affordable rental units. Unfortunately, the Township's Housing Trust Fund is nearly depleted. This is as a result of the State exempting non-residential development from paying an affordable housing fee and the downturn of residential development that limits the amount of money collected. These factors will force the Township to be creative in continuing to satisfy its affordable housing obligation.

Specific Changes Recommended for the Master Plan or Development Regulations

The Land Development Board recommends the following specific changes to the Master Plan and Development Regulations:

- 1. All of the Specific Changes Recommended for the Master Plan or Development Regulations, as enumerated in the 2006 Reexamination Report and identified as open or ongoing issues in the Extent to Which Such Problems and Objectives

 Have Been Reduced or Have Increased section of this Reexamination Report shall continue as recommendations.
- 2. Although the market for single-family detached homes is stagnant, there is interest in constructing and a need for apartments. Property located on Block 902, Lots 1-3, would be a prime location for apartments; however, the current OR-1 zoning does not permit residential use.

The site requires some improvements for site access but has the potential of excellent access to the regional highway network. In addition, the site will become a major cog in the regional redevelopment of the Burlington Center Mall and commercial expansion in the immediate area.

This site was determined to be an area in need of redevelopment by the Township Committee. A redevelopment plan that permits multifamily housing as a permitted use has been approved.

3. Western Drive is currently a dead-end Township street serving several hotels and the Academy Bus depot and service facility. It intersects Route 541 at a traffic light-controlled intersection.

Western Drive has the potential to be extended into and through the redevelopment area and continuing into Burlington Township. As such, it has the potential to become a major traffic thoroughfare connected to a redeveloped Burlington Center Mall and extensive commercial areas planned in Burlington Township.

In order for Western Drive to reach its potential, a number of issues need to be resolved. First, the Route 541 intersection is poorly designed, confusing for drivers and subject to breakdown and congestion, especially during rush hours, and compounded by the arrival and departure of Academy buses. The intersection should be redesigned and rebuilt; however, this will require the assistance and cooperation of Burlington County and perhaps NJDOT. It is recommended that discussions with Burlington County begin immediately.

Proper planning and the reservation of the necessary right-of-way to extend Western Drive to Burlington Township are also necessary. It is recommended that the planning for the Western Drive extension be incorporated into planning for any development proposed in the redevelopment area. Coordination with Burlington Township is also imperative and should also begin immediately.

4. The proposed Virtua campus location is impacted by two zoning districts: the bulk of the site and the entire Route 541 frontage are zoned OR-1 while a strip 400 feet wide along Woodlane Road is zoned C-Commercial. While both zones permit medical and dental clinics and labs as well as professional offices, only the C zone permits hospitals as a condition use. However, the currently C-zoned portion of the tract cannot satisfy all of the required conditions.

It is recommended that an overlay zone be developed that would permit development of a medical campus on this site as a conditional use. The sole conditional uses for this new overlay zone would be a planned medical campus that would be subject to a general development plan approval for the entire tract. Medical uses and facilities would be the principal permitted uses as well as supporting uses such as restaurants, cafeterias and snack bars, daycare centers and medically related retail such as drugstores. New bulk and design standards specifically developed for this new zone would be required.

If planned properly, the proposed medical campus can be developed to be compatible with the Township's Vision Plan. Although the medical campus will include relatively large buildings separated by large areas of parking fields and open space, proper planning can and should incorporate many of the design elements envisioned for the proposed town center, including pedestrian and bicycle access and circulation, enhanced landscaping, building facades that should be sensitive to the vernacular and context of South Jersey while allowing modifications to accommodate the future of healthcare, and provide pedestrian-scaled amenities. In addition, the Route 541 frontage could be development with smaller and lower buildings and uses that would be compatible with the proposed town center.

- 5. Burrs Road currently ends at a controlled intersection at Route 541. Burrs Road should be extended to intersect with Woodlane Road as part of the development of the proposed medical campus. This roadway extension will provide an important secondary entrance to the medical campus, relieve some traffic congestion at the Woodland Road-Route 541 intersection and provide better access to the medical campus from parts of the western and southern parts of Burlington County.
- 6. Develop land use regulations and ordinances to begin implementing several goals listed in the Township Vision Statement. The following goals, in particular, should be addressed:
 - Goal 2: Identify potential opportunities for mixed-used development along major transportation corridors.

Goal 5:

- (1) Create a "Center"...along the Route 541 corridor.
- (2) Permit "mixed uses" in the "Center".
- (3) Eliminate the OR zoning classification in favor of additional pedestrian-oriented, mixed-used commercial zoning.
- (4) Develop design guidelines for the "Center"...

Goal 6: Provide transportation choices, including bicycle paths, pedestrian networks and public transportation.

Goal 7: Provide quality housing choices within the community to satisfy existing residents and welcome new neighbors.

Although the Vision Plan discussed all areas of the Township, the Plan's focus was on the area that represented the best potential for attaining the Vision: the Route 541 corridor.

The Route 541 corridor is a major traffic route connecting Mt. Holly in the east to Burlington City in the west. Major intersections are provided at I-295 and the New Jersey Turnpike. There are limited pedestrian and bicycle facilities along much of the length of the highway.

The corridor has the ability to be served by both public water and sanitary sewer facilities. The corridor through adjacent towns is mostly developed with separate residential and commercial zoning districts. Mixed-use zoning, either combining different uses on the same lot or within the same building or to a planned development approach on a single large tract of land, is mostly absent.

Within Westampton Township, Route 541 exhibits several distinct development patterns. The eastern end exhibits a typical suburban strip center development pattern. This area has a mix of older commercial strip centers interspersed with smaller new construction and conversions of homes into commercial uses. Reuse and redevelopment of existing sites are expected to remain the dominant development pattern along this area of Route 541. An immediate benefit to this area would accrue from enhanced pedestrian and bicycle access and landscaping standards.

The central portion of the 541 corridor is dominated by farmland. As this farmland is not on the County Farmland Preservation Priority Acquisition List, farming in this area would be considered an interim use. The Burlington County complex composed of office buildings, schools and training facilities, the central County library and similar uses is the second most important use along this

section of Route 541, although the complex only has a relatively small frontage along Route 541.

The central portion of the corridor provides the best opportunity to develop a center of mixed-use activity for the Township. The other sections of Route 541 offer limited opportunities for large mixed-use developments and are better suited to a re-use, small-scale redevelopment scheme utilizing upgraded and enhanced site development and amenity standards.

The western portion of Route 541 is adjacent to the Burlington Center Mall and newer strip commercial areas. Within Westampton Township, a concentration of regional, travel-related uses has developed adjacent to the Turnpike entrance. These uses include hotels, restaurants, service stations and the Academy Bus terminal facilities and park and ride lot. Some farmland exists but would be considered as an interim use as the farms are not on the Priority Preservation Acquisition List.

As most of the development along the western portion of Route 541 is relatively new, redevelopment is not likely. Instead, the area would benefit from enhanced and upgraded pedestrian and bicycle access and better signage. A review of the existing zoning of farmland in this section is also warranted to ensure development that is compatible with the Township's Vision Plan.

Because of differing needs for the three distinct areas along Route 541, a phased approach to developing new and/or revised implementing land use regulations is recommended. Due to difficult economic conditions, a multi-year timeframe for developing the necessary land use regulations is also recommended. Finally, the more general land use regulations, such as sidewalk, bikeway, landscaping and sign standards, are recommended to be developed for use throughout the Township.

For the year 2015, the following are the specific recommendations for the 541 corridor:

A. Develop a mixed-use center land use plan and land use regulations for the north side of Route 541. For the year 2015, the scope of work would be limited to Block 906, Lots 4 and 5.

A new zoning district would permit retail, office, institutional and residential uses. A mix of uses would also be permitted in individual buildings. Size limits for individual non-residential uses and individual buildings should be considered.

B. Develop architectural design standards primarily for the proposed mixeduse zone. With modifications, the proposed design standards should be transferable to other zoning districts. Any proposed modifications would be completed in 2016.

- C. Existing pedestrian bicycle facility standards will be upgraded. Specific standards will be developed for the proposed mixed-use zone with the goal of developing a pedestrian-friendly center.
- D. Although appropriate landscaping and buffering are important elements in all developments, revised standards for the mixed-use zone will be developed to ensure a pedestrian-friendly environment.
- E. Sign standards for pedestrian-oriented development will be developed.
- 7. The remainder of the zoning districts along Route 541 should be studied in future years. The goal should be to consolidate zones where possible, modify permitted uses based on the Vision Plan and market conditions and incorporate select development standards from the proposed mixed-use zone into the remaining zones along Route 541.
- 8. Convert the R-5 Residential Zone into an Institutional Use Zone primarily devoted to governmental buildings and facilities, public and private recreation facilities, public and private schools and public open space. New residential uses should be discouraged. The existing OR-2 and R-6 Zones along Centerton Road should be rezoned to the proposed Institutional Zone as the uses include public recreational facilities and open space and the Friends School complex.
- 9. The OR-2 Zone should be reexamined to determine appropriate permitted uses and bulk standards based on the Vision Plan. The OR-2 Zones that remain one along Springside Road and the other along Hancock Lane offer different opportunities and have different issues. For example, the Springside Road zone should serve as a transition and buffer zone between the industrial park and Rancocas Village whereas the Hancock Lane zone is expected to become an extension of the regional commercial center clustered around the Burlington Center Mall.
 - The OR-2 Zone located along Hancock Lane has been designated as a Redevelopment Area. The site is expected to be developed primarily with multifamily housing.
- 10. The R-1, R-2 and R-6 residential zoning districts should be reviewed for possible consolidation. The cluster development option should be considered for all three zones. The list of permitted conditional uses should be reviewed against the Vision Plan. Finally, most of the remaining vacant land that is currently zoned R-1 has been removed from potential sewer service areas. As a result, large lot sizes to accommodate required septic systems should be considered.

Recommendations Concerning the Incorporation of Adopted Redevelopment Plans into the Land Use Element

A. In March, 2014, Block 401, Lots 2 and 8, were declared "An Area In Need of Redevelopment" under Section 40A:12A-5 of the New Jersey Local Redevelopment and Housing Law. The site is a Non-Condemnation Redevelopment Area that satisfies at least two designation criteria. The first criteria is that the site has remained unimproved for over 10 years and is not likely to be developed using private capital primarily due to extensive wetlands and site access issues. The second criteria is that the designation is consistent with the planning principles for smart growth as defined by the State of New Jersey.

In April, 2014, a Redevelopment Plan for this area was adopted. The Plan specifies that the only permitted use is multi-family low- and moderate-income housing that will be consistent with COAH rules and regulations. The Plan will permit up to 72 rental units in a 100% affordable housing development. Zoning bulk and density standards are included in the Plan.

The site has always been part of the Township's Court-approved Housing Element and Fair Share Plan in conformance with the New Jersey Fair Housing Act. The area is currently zoned to permit inclusionary housing developments that are required to provide up to 15% of the total number of units as affordable. The extent of wetland areas would have severely limited the resulting number of affordable units.

It is recommended that the Redevelopment Area consisting of Block 401, Lots 2 and 8, be incorporated into the Westampton Township Land Use Plan Element for the following reasons:

- The location of the planned affordable housing development is consistent with the Township's Housing Element and Fair Share Plan.
- The area is more likely to be developed using the benefits associated with the Redevelopment statutes including, but not limited to, the ability to apply for and receive affordable housing tax credits.
- Up to four times the potential number of affordable units compared to the current inclusionary housing zoning.
- B. In July, 2014, Block 902, Lots 1, 2 and 3, were declared "An Area in Need of Redevelopment" under Section 40A:12A-5 of the New Jersey Local Redevelopment and Housing Law. The site is a Non-Condemnation Redevelopment Area that satisfies at least two designation criteria. The first criteria is that the site has remain unimproved for over 10 years and is not likely to be developed using private capital primarily due to site access issues. The second criteria is that the designation is consistent with the planning principles for smart growth as defined by the State of New Jersey.

In September, 2014, a Redevelopment Plan for this area was adopted. In addition to permitting all uses permitted in the OR-2 Zoning District, the Plan permits multifamily,

attached housing. The Plan also requires that 28 of the dwelling units be affordable to low- and moderate-income residents. Zoning bulk and density standards are included in the Plan.

This site was included in the Township's revised Housing Element and Fair Share Plan adopted in December, 2014.

It is recommended that the Redevelopment Area consisting of Block 902, Lots 1, 2 and 3, be incorporated into the Westampton Township Land Use Plan Element for the following reasons:

- The location of the planned affordable housing units is consistent with the Township's Housing Element and Fair Share Plan.
- The area is more likely to be developed using the benefits associated with the Redevelopment statutes.
- The area will increase the Township's diversity of housing stock and will assist the Township in satisfying its affordable housing obligation.
- C. Block 203, Lot 4.03, is being considered to be "An Area in Need of Redevelopment" under Section 40A:12A-5 of the New Jersey Local Redevelopment and Housing Law. This site will be considered as a Non-Condemnation Redevelopment Area that will satisfy at least one designation criteria. The first is that the site has remained unimproved for over 10 years and is not likely to be developed using private capital. The second is that the designation is consistent with the planning principles for smart growth as defined by the State of New Jersey.

A Redevelopment Plan for this area will be prepared and adopted that will specify that the only permitted use is multi-family low- and moderate-income housing that will be consistent with COAH rules and regulations. The Plan will permit up to 24 rental units in a 100% affordable housing development. Zoning bulk and density standards are expected to be similar to the existing standards in the R-8 Zone.

The site is part of the Township's Housing Element and Fair Share plan in conformance with the New Jersey Fair Housing Act. The site is adjacent to a 48-rental unit affordable housing development that is currently under construction. After approval and construction, both sites will function as a unified development.

Once adopted, it is recommended that the Redevelopment Area consisting of Block 203, Lot 4.03, be incorporated into the Township's Land Use Element for the following reasons:

- The location of the planned affordable housing development is consistent with the Township's Housing Element and Fair Share Plan.
- The area is more likely to be developed using the benefits associated with the Redevelopment statutes including, but not limited to, the ability to apply for and receive affordable housing credits.

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