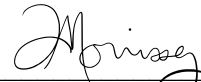


Site Suitability Analysis

TROLLINGER SITE MEDFORD MOUNT HOLLY ROAD

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Prepared by:



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

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INTRODUCTION

This report has been prepared to address the site suitability for the Trollinger affordable housing site consisting of Block 302, Lots 14, 26, 27 & 49 on the Medford Township tax maps. As originally proposed 300 units would be constructed, including 50 affordable housing units and 5 bonus credits. This site addresses a portion of the Township's Fourth-Round affordable housing obligation as provided for in their Housing Element and Fair Share Plan ("HEFSP"). The Township's HEFSP provides for the property to contain 50 affordable age-restricted units.

This site was raised by an objector as not being suitable because it is outside an approved sewer service area. It was also raised that the site as proposed would not satisfy the Uniform Housing Affordability Controls (UHAC) under N.J.A.C. 5:80-26.5(b)(s)(iii) because the unit type for the affordable units was not the same as the unit type for the market rate units. Lastly the site was identified as creating too many age-restricted affordable housing units which would exceed the maximum permitted and therefore exceed the permitted bonus credits for age-restricted units.

In light of the above objections the concept plan for this site was revised to demonstrate that the site can accommodate and support an inclusionary development. The site can be developed with a lower number of age-restricted affordable units or no age-restricted affordable units and the site can include the appropriate mix of housing types to meet the UHAC requirements. Included with this analysis are two alternative concept plans which provide for 300 total units. These two options are able to satisfy the UHAC regulations and address the maximum permitted age-restricted units in the Township's HEFSP.

With respect to the suitability of this site, the following timeline and site suitability analysis demonstrates that the site is available, approvable, developable and suitable.

Timeline for Trollinger Property:

May 16, 2017	Redevelopment Area Designation Adopted by Township
August 28, 2018	Redevelopment Designation approved by the State of New Jersey
April 17, 2025	NJDEP LOI Application Submitted
June 14, 2025	Adoption of Township Fourth- Round HEFSP
September 2025	Submission of WQMP Amendment
September 2025	Traffic Study Scheduled
October 2025	Geo Tech/Soil Testing Completed
October 2025	FHA Line Verification Submission
November 2025	Archeological Study Scheduled

The above timeline shows that there has been continuing approvals and permitting activity for the Trollinger property. The Township completed the Redevelopment Designation and is in the process of adopting a Redevelopment Plan. Applications have been or are in the process of being submitted to various agencies to address all necessary permitting. These include environmental permitting, WQMP amendments and verification of Flood Hazard Areas. The above and details below show a clear effort to the continuing development plans for the Trollinger property and that the site continues to represent a realistic development opportunity for affordable housing.

ANALYSIS

When identifying a site for affordable housing development, the site intended for development must be suitable for that purpose. Site Suitability is addressed in COAH’s Second Round regulations at N.J.A.C. 5:93-5.3. The criteria which a site is to be evaluated includes a finding that the site is available, approvable, developable and suitable as defined in N.J.A.C. 5:93-1.

Site Description

The Trollinger site is located along Medford Mount Holly Road with a small leg reaching out to Church Road. The site contains a total of 166.48 acres in the Township of Medford. The proposed site development includes the construction of 300 total residential units with 55 affordable housing units, as highlighted above in either Concept A or Concept B.

The site is located within an approved Redevelopment Area. The Township is preparing a Redevelopment Plan which would allow the proposed development. This is expected to be approved early next year. The proposed concept plan identifies the location of wetlands and buffers. All development is outside of the restricted and environmentally sensitive areas. The site is able to accommodate the required stormwater management facilities and site improvements to facilitate the proposed development.

Available Site

“Available site” means a site with clear title, free of encumbrances which preclude development for low and moderate income housing.

The site has a clear title and is free of encumbrances, which preclude development of affordable housing.

Supporting Documents:

- Appendix I – Alta Survey
- Appendix II - Title Commitment and Search

Approvable Site

“Approvable site” means a site that may be developed for low and moderate income housing in a manner consistent with the rules and regulations of all agencies with jurisdiction over the site. A site may be approvable although not currently zoned for low and moderate income housing.

The subject property is included in an approved Redevelopment Area and a Redevelopment Plan is being completed. The Redevelopment Area was created in 2017 and approved by the State of New Jersey on August 28, 2018. The Redevelopment Plan is being prepared and is expected to be completed early next year (2026). The proposed development of 300 total units including up to 55 affordable units will be permitted in accordance with an adopted Redevelopment Plan.

Supporting Documents:

- Appendix III – Concept Development Plans

In addition to the above, the following sections further the approvable site standard through outside agency permitting and status. The permitting for a Wastewater Quality Management Plan (“WQMP”) amendment is expected to be submitted by October 2025. An application has been submitted to New Jersey Department of Environmental Protection (“NJDEP”) for a Letter of Interpretation (“LOI”). An application is being prepared with respect to the Flood Hazard Area. Approvals and applications are either in the process of submission or pending for outside agencies demonstrating that the site remains viable and approvable.

Developable Site

“Developable site” means a site that has access to appropriate water and sewer infrastructure, and is consistent with the applicable area wide water quality management plan (including the wastewater management plan) or is included in an amendment to the area wide water quality management plan submitted to and under review by DEP.

The proposed concept plan for development includes a delineation of wetlands and buffers consistent with the NJDEP LOI application. An application has been submitted to NJDEP for a LOI as to the location of wetlands and wetland buffers. The concept plans indicate the anticipated wetland lines and buffers, and all development is outside of these areas.

It is expected that the site will be partially impacted by a NJDEP Flood Hazard Area (FHA), however all proposed development is outside of the regulated areas. The FHA are expected to be in the areas where wetlands are identified.

The subject site would require approval of an amended WQMP to extend sewer to the site. The property is partially within an existing Sewer Service Area (SSA), the amendment would extend the area to the entire property. Approximately 66 acres, within Block 302, Lot 26, of the entire 166-acre parcel is within an approved SSA. The fact that part of the site is already partially within a SSA contributes to the approvability of the proposed amendment. An application is in the process of being completed and will be submitted by October of this year (2025).

The Township has determined that there is adequate capacity for public sewer and public water through the Township of Medford. The Township of Medford Utilities Authority issued a “will-serve” letter indicating there is capacity for the project. Similar “will-serve” letters have been issued by Verizon and PSE&G.

Soil Testing is expected to be completed by the end of October of this year (2025). The soil testing will determine which soils on site are suitable for development and will be able to support an approvable stormwater management design. The current contract purchaser has engaged a Geo-Technical engineering Firm to provide this testing.

The above contributes to the determination that the subject site is a Developable Site as provided for in the Township’s HEFSP.

Supporting Documents:

- Appendix IV - NJDEP Wetlands LOI Application
- Appendix V – Water Service Exhibit
- Appendix VI – Sewer Service Exhibit
- Appendix VII - Will Serves
 - Medford Public Works Water & Sewer
 - PSE&G Gas and Electric
 - Verizon Telecommunications

Suitable Site

“Suitable site” means a site that is adjacent to compatible land uses, has access to appropriate streets and is consistent with the environmental policies delineated in N.J.A.C. 5:93-4.

Compatible Land Uses

The Trollinger property has frontage and access along Medford Mount Holly Road and an emergency access from Church Road. The property is across from the Fellowship Alliance Chapel campus. Along Medford Mount Holly Road just south of the property is a neighborhood shopping center. There are other neighborhood commercial uses proximate to the site including a Dunkin Donuts Shop and bank. There are single family residential uses in the surrounding area as well. Further north along Medford Mount Holly Road are public recreational fields. The properties are within the Township’s Agricultural Retention (AR) zone. The AR zone permits a variety of residential developments including Senior Citizen Planned Developments on tracts of at least 100 acres with public water and sewer in select areas. The AR zone also permits residential cluster development. The AR zone while entitled agricultural retention does permit similar land use developments to the proposed development in terms of housing type and density. The surrounding land uses are residential in nature with neighborhood commercial uses. The proposed residential development would be located around similar and compatible land uses.

Appropriate Streets

The subject property is located along Medford Mount Holly Road, also known as County Route 541. This is a two-lane roadway with a center turn lane and wide shoulders and a posted speed limit of 50 mph. Medford Mount Holly Road provides connections to County Route 616 (Church Road). A traffic study is scheduled to be completed in the Fall of 2025.

The site can be developed consistent with the Residential Site Improvement Standards, N.J.A.C. 5:21-1.4 for Streets and Parking.

Environmental policies delineated in N.J.A.C. 5:93-4

In accordance with the regulations a site which is impacted by inland wetlands, flood hazard areas and steep slopes may be excluded as potential sites for affordable housing. That does not mean any site with these conditions shall be excluded but requires a review of these conditions to determine if these conditions “render a site unsuitable for low- and moderate-income housing.” (N.J.A.C. 5:93-4.2(e)2.ii.) The regulations provide further that where these conditions exist that low- and moderate-income housing shall not be permitted “on that unsuitable portion of the site; provided however, that this rule shall not prohibit construction of low- and moderate-income housing on the remainder of the site.” (N.J.A.C. 5:93-4.2(e)2.ii.)

While the Trollinger site contains inland wetlands, flood hazard areas and limited steep slopes, these conditions do not impact the entire site. As demonstrated on the submitted concept plans, the site can be developed outside of these areas in a manner which meets all environmental regulations as noted below.

Inland Wetlands

An application has been submitted to NJDEP for an LOI which identifies wetlands and wetland buffers. The concept plans include the anticipated wetland areas and buffers. The wetland areas run along the northern property border consistent with the location of the Southwest Branch of Rancocas Creek and generally include the wooded areas on the property. The areas which were agricultural fields are upland areas and proposed for development. The plan includes buffers of 50-feet. An Archeological study is also scheduled to start in November of 2025 for the subject site. The study will be submitted to NJDEP to supplement the wetlands application in the event there is a wetlands disturbance permit required.

Flood Hazard Areas

The property is expected to be subject to FHA. An application to verify the FHA line is in the process of being completed. It is expected that the FHA will coincide with the location of the wetland areas and the areas proposed for development would not be impacted. The location of the flood hazard area will be verified through a NJDEP Flood Hazard Verification.

Steep Slopes

There are portions of the site which are impacted by limited steep slopes. The location of the steep slopes does not render the site unsuitable for development. The proposed site design accounts for the location of steep slopes.

Supporting Documents:

- Appendix IV – NJDEP Wetland LOI Application

UNIFORM HOUSING AFFORDABILITY CONTROLS

The concept plan for this site was revised to demonstrate that the site can accommodate and support an inclusionary development which meets the UHAC requirements with regard to housing types. Under the UHAC regulations as proposed, in an inclusionary development with for-sale units the **“Restricted units may be of different housing product types than market-rate units, provided that developments containing market-rate duplexes, townhomes, and/or single-family homes offer restricted housing options that also include duplexes, townhomes, and/or single-family homes.”** N.J.A.C. 5:80-26.5.3.iii

The two alternative concept plans included within this report meet the UHAC requirements, demonstrating that the Township HEFSP can be modified to ensure compliance with the regulations while including the subject property. Concept A includes 36- twin active adult affordable housing units, 5 single-family affordable housing units, and 14 townhouse affordable housing units for a total of 55 affordable housing units. Concept A also includes 147 single-family market rate units, and 98 townhouse market rate units for a total of 245 market rate units. Concept B includes 9 single-family affordable housing units, and 46 townhouse affordable housing units for a total of 55 affordable housing units. Concept B also includes 141 single-family market rate units, and 104 townhouse market rate units for a total of 245 market rate units. These two options are able to satisfy the UHAC regulations and address the maximum permitted age-restricted units in the Township’s HEFSP. The site can be developed with a lower number of age-restricted affordable units, or no age-restricted affordable units and the site can include the appropriate mix of housing types to meet the UHAC requirements.

CONCLUSION

The subject property with frontage and access along Medford Mount Holly Road is suitable for the proposed development of 300 residential units, including up to 55 affordable housing units. The proposed site has clear title and sufficient unrestricted land area to accommodate the development. The development of the site requires an amendment to the WQMP, an application is being submitted in October of this year. The required environmental permits are being submitted, with the application for an LOI submitted and FHA to be submitted later this year. There are no unusual conditions which would result in the restriction or prevention of the proposed site development. The Township is working with the developer to create a Redevelopment Plan to provide for the proposed development. Approval of the Redevelopment Plan is expected in early 2026.

In my professional opinion, this site is suitable, approvable and developable for the proposed 300 residential units. The site provides an appropriate location to create a variety of housing types in the municipality. This creates a greater opportunity for lower income families in the region to find affordable housing.

Additionally, the timeline of development approvals demonstrates that the site remains viable and continues to provide a realistic opportunity for an inclusionary affordable housing development. And the alternative concept plans clearly demonstrate that this site can meet the UHAC requirements.