



B U R G I S
A S S O C I A T E S , I N C .

MEMORANDUM

To: Cosmas P. Diamantis, Esq., Director of Community Development
From: Joe Burgis PP, AICP, and Robyn Welch PP, AICP
Subject: Cherry Hill Planning Board
Devel, LLC – Phase 1 & 2 and Phase 3
Application #17-P-0041 and #18-P-0002
Date: March 14, 2023
BA#: 3858.01

This memorandum supplements our prior review memorandum dated February 16, 2023 relative to the proposed affordable housing units proposed as part of the above-noted inclusionary development application. The following is offered for the Planning Board’s consideration.

1. Integration of Affordable Units

Since our prior review memorandum, the applicant has issued a Revised Plan of H.O.A. Limit Lines and Affordable Unit Allocation, revised to March 6, 2023, which modifies the proposed distribution of the proposal’s 32 affordable housing units as shown in the table below:

Table 1: Proposed Modification to Distribution of Units

HOA	Building	Previous Distribution			Modified Distribution		
		Market	Affordable	Total	Market	Affordable	Total
Normandy	1-I	7 (100%)	0	7	5 (56%)	4 (44%)	9
	2-C	0	10 (100%)	10	3 (43%)	4 (57%)	7
	3-G	6 (60%)	4 (40%)	10	5 (45%)	6 (55%)	11
	3-H	4 (50%)	4 (50%)	8	6 (100%)	0	6
	Infill	5 (100%)	0	5	3 (43%)	4 (57%)	7
Cotswold	2-B	3 (60%)	2 (40%)	5	3 (60%)	2 (40%)	5
	Infill	0	4 (100%)	4	0	4 (100%)*	4
	Infill	0	4 (100%)	4	0	4 (100%)*	4
	Infill	0	4 (100%)	4	0	4 (100%)*	4
Total		25	32	57	25	32	57

*: Each of these infill buildings consist of two adjoining one-over-one flats.

As shown, this revised distribution plan now proposes no more than 4 affordable housing units in any one building on the site, with the exception of Building 3-G, which is proposed to contain 6 affordable housing units. (In communications with our office, the applicant's engineer has asserted that the grading conditions in Phase 3 of the development prohibit further integration of the affordable units in that area.) In addition, the revised distribution plan continues to maintain consistency with the project's prior condition of approval requiring proportionate disbursement of affordable units to each homeowners' association.

Given the constraints of the site and the modifications that have been made since our prior review memorandum, it is our opinion that the proposed distribution plan now satisfies the Township's and COAH's requirements of integrating the affordable units with the market rate units to the extent possible. However, the following is recommended for the Board's consideration:

- a. We recommend that the Board condition any approval of this application on the requirement that the applicant shall provide no more than 4 affordable housing units in any one building, with the exception of Building 3-G, which shall be permitted to contain a maximum of 6 affordable housing units due to grading constraints in Phase 3.
- b. Further, we recommend that the applicant provide an exhibit for the Board's review which depicts the grading in Phase 3 and demonstrates/confirms that the grading prohibits further relocation of affordable units in this area.

2. Bedroom Distribution

In addition, it is reiterated for the Board's consideration that the Uniform Housing Affordability Controls (UHAC) require at N.J.A.C. 5:80-26.3(b) that no less than 20% of the proposed affordable units (i.e., minimally 7 units) be 3-bedroom units. Although the architectural plans suggest that a portion of the affordable units will be 3-bedroom units and that the remaining affordable units will be 2-bedroom units, the site plan drawings for both Phases 1 & 2 and Phase 3 indicate (in the minimum parking calculations) that all of the proposed affordable units will be 2-bedroom units.

As noted in our prior review memorandum, the applicant has confirmed via email communication with our office that the proposal will, in fact, provide the required number of 3-bedroom affordable units per UHAC. While we find this satisfactory, we continue to recommend that the plans be updated to clarify the proposed number of bedrooms in each of the affordable units in order to demonstrate compliance with UHAC, as well as to revise the proposal's minimum parking requirement calculations as necessary to account for the bedroom distribution of the affordable units.

We would be pleased to respond to any questions or requests for further information you may have regarding this report.

JB/RW