

RESOLUTION #64-2026

**BOROUGH OF STRATFORD, COUNTY OF CAMDEN ADOPTING AN AMENDED
SPENDING PLAN FOR THE AFFORDABLE HOUSING TRUST FUND**

WHEREAS on January 9, 2025 Stratford Borough Council adopted Resolution #25:25 establishing the Borough's Fourth Round Present and Prospective Need pursuant to the amended Fair Housing Act ("FHA") at N.J.S.A. 52:27D-301 et seq., per P.L. 2024, c.2; and

WHEREAS on January 10, 2025 the Borough submitted a Declaratory Judgment Action to the New Jersey Superior Court (Docket CAM-L-000101-25); and

WHEREAS on March 28, 2025, the Superior Court of New Jersey entered an Order on Fair Share Obligations, fixing the Borough's Fourth Round Present Need at 10 units, and the Borough's Fourth Round Prospective Need at 25 affordable units; and

WHEREAS on June 26, 2025, the Joint Land Use Board held a public hearing and adopted the Borough's 2025 Fourth Round Housing Element and Fair Share Plan (the "Plan"), addressing the Borough's Prior Round obligation, Third Round obligation, Fourth Round obligation, and Fourth Round Present Need/Rehabilitation Share as established; and

WHEREAS on February 27, 2026 Judge Toskos signed the Program Decision Recommendation on the Borough's Fourth Round Housing Element and Fair Share Plan; and

WHEREAS one of the conditions for compliance is an updated Affordable Housing Trust Fund Spending Plan; and

WHEREAS, Stratford Borough first adopted a mandatory development fee ordinance in 2005 to establish standards for the collection, maintenance, and expenditure of development fees to be used for supporting and providing low- and moderate-income housing in the Borough; and

WHEREAS, the mandatory development fee ordinance located at section 17.05.020 of the Borough Code has been updated several times, most recently by Ordinance 03-2026 on March 12, 2026, consistent the NJHMFA's Uniform Housing Affordability Controls ("UHAC") at N.J.A.C. 5:80-26, the Amended Fair Housing Act ("FHA") at N.J.S.A. 52:27D-301 et seq., and DCA's rules; and

WHEREAS, Stratford Borough has established an Affordable Housing Trust Fund (AHTF); and

WHEREAS, an AHTF Spending Plan was prepared in 2021 to ensure that the Borough was authorized to collect and spend affordable housing trust fund monies for affordability assistance consistent with the applicable rules and regulations, if and when monies were collected; and

WHEREAS, in 2024 an updated AHTF Spending Plan was adopted to account for additional non-residential redevelopment that was expected to result in the collection of additional funds; and

WHEREAS, the AHTF Spending Plan is now being updated as a component of the Fourth Round Fair Share compliance plan as required by N.J.S.A. 52:27D-329.2 to allocate funds from the municipal affordable housing trust fund for permitted activities in support of affordable housing; and

WHEREAS N.J.S.A. 52:27D-329.2(a)(4) requires that the spending plan include a plan to spend current and projected funds through the current round of affordable housing; and

WHEREAS N.J.S.A. 52:27D-329.2(c) provides parameters for spending plans, including that a portion of revenues be expended to provide affordability assistance to low- and moderate-income households in affordable units and that a maximum of 20 percent of revenues be expended on administration; and

WHEREAS N.J.S.A. 52:27D-329.2(d) provides that all fees shall be committed for expenditure within four years from the date of collection; and

WHEREAS the purpose of this Resolution is to approve Stratford Borough's 2026 Affordable Housing Trust Fund Spending Plan so that the Borough may continue to collect mandatory development fees and payments in lieu if and when applicable and may make expenditures as set forth in the Spending Plan in support of low- and moderate-income households in Stratford Borough.

NOW, THEREFORE, BE IT RESOLVED by the Borough Council of the Borough of Stratford, that the Affordable Housing Trust Fund Spending Plan dated April 2026 be and is hereby approved.

CERTIFICATION

I, Michelle Hack, RMC do hereby certify the foregoing Resolution to be a true and complete copy of a Resolution duly adopted at a public meeting of the Governing Body of the Borough of Stratford held on
April 9, 2026.



Michelle Hack, RMC
Borough Clerk

Stratford Borough
Affordable Housing Trust Fund Spending Plan
April 2026
Adopted by Resolution 2026-_____

Introduction

The Borough of Stratford (the “Borough”), Camden County, has prepared a Housing Element and Fair Share Plan that addresses its regional fair share of the affordable housing need in accordance with the Municipal Land Use Law (N.J.S.A. 40:55D-1 et seq.), the Amended Fair Housing Act (FHA) (N.J.S.A. 52:27D-301) and the new Fair Housing Act Rules promulgated by the New Jersey Department of Community Affairs (DCA) (N.J.A.C. 5:99). A development fee ordinance creating a dedicated revenue source for affordable housing and establishing the Borough of Stratford Affordable Housing Trust Fund was first adopted by the Borough in 2005, was updated by Ordinance 2008:17 on December 9, 2008, by ordinance 2009:12 on May 12, 2009, by ordinance 2010:10 on September 14, 2010, by ordinance 2021:08 on May 11, 2021, and has been most recently updated by ordinance 03-2026 on March 13, 2026.

As of December 31, 2025, the Borough of Stratford had a balance of \$85,807¹ in its Affordable Housing Trust fund. All development fees, payments in lieu of constructing affordable units on site, funds from the sale of units with extinguished controls, and interest generated by the fees are deposited in a separate interest-bearing affordable housing trust fund account for the purposes of affordable housing. These funds shall be spent in accordance with N.J.A.C. 5:99 as described in the sections that follow.

1. Revenues for Certification Period

To calculate a projection of revenue to be added to the AHTF during the Fourth Round compliance period (January 1, 2026 to June 30, 2035 for the purposes of this Spending Plan), the following have been considered:

(a) Development fees:

- Residential and nonresidential projects that have had development fees imposed upon them at the time of preliminary or final development approvals.
- All projects currently pending before the Planning Board for development approvals that may apply for building permits and certificates of occupancy.
- Future development that is likely to occur based on historical rates of development and known opportunities.

Based on development patterns and revenue collection trends over the last 25 years, it is anticipated that development fee collection in Stratford will be low because the Borough is built out and all development is redevelopment, and any new residential redevelopment will be inclusionary (no payment is required when affordable housing is provided). One significant contribution is anticipated from an approved Independent Living facility (if the plan is ever actualized). There may be additional opportunities for nonresidential redevelopment that will

increase the assessed value of a property and therefore result in contributions to the AHTF but are not yet anticipated. These contributions will enable continuation of the municipal rehabilitation program and will offset the Borough's affordable housing costs as set forth in further detail below.

(b) Payment in lieu (PIL). During the Fourth Round compliance period, Stratford does not anticipate any payments in lieu of providing affordable housing.

(c) Other Funds:

- Because "other funds" revenue is irregular and unpredictable (and none is currently predicted), there are no projections from this funding source during the compliance period.

(d) Projected interest:

- Interest on the projected revenue in the AHTF is projected at the current interest rate of .6% (the account is at 1st Colonial Community Bank).
- It is estimated that the Borough will collect interest on the AHTF between January 1, 2026 through June 30, 2035. The interest estimates in the table below assume that the trust fund balance will be applied toward the Borough's affordable housing programs. In total it is anticipated that \$3,346 in interest will be added to the AHTF over the Fourth Round compliance period.

SOURCE OF FUNDS	PROJECTED REVENUES – AFFORDABLE HOUSING TRUST FUND JANUARY 1, 2026 THROUGH JUNE 30, 2035											Total
	2026	2027	2028	2029	2030	2031	2032	2033	2034	To 6/30/2035		
(a) Development Fees	\$133,750	0	\$5,000	\$200,000	\$5,000	\$200,000	\$5,000	0	\$5,000	0	\$553,750.	
(b) Payments in Lieu of Construction	0	0	0	0	0	0	0	0	0	0	0	
(c) Other Funds	0	0	0	0	0	0	0	0	0	0	0	
(d) Interest	\$717	\$211	\$63	\$663	\$97	\$697	\$432	\$254	\$106	\$106	3,346	
Total	134,467	211	5,063	200,663	5,097	200,697	5,432	254	5,106	106	557,096	

In sum, the Borough Stratford projects a total of \$557,096 in revenue to be collected between January 1, 2026 and June 30, 2035. This projected amount, when added to the Borough's current trust fund balance of \$85,807 results in a total anticipated trust fund balance of \$642,903 available to fund, support, and administer the Borough's affordable housing plan. All interest earned on the account shall be used only for the purposes of affordable housing.

2. Administrative Mechanism to Collect and Distribute Funds

The following procedural sequence for the collection and distribution of development fee revenues shall be followed by the Borough:

(a) Collection of development fee revenues:

Collection of development fee revenues shall be consistent with the Borough's development fee ordinance (Section 17.05.020) for both residential and nonresidential developments in accordance with the Uniform Housing Affordability Controls ("UHAC") at N.J.A.C. 5:80-26, the Amended Fair Housing Act ("FHA") at N.J.S.A. 52:27D-301 et seq., the Municipal Land Use Law at N.J.S.A. 40:55D-8.1 through 8.7) and DCA's rules at N.J.A.C. 5:99.

Upon application for a zoning permit or building permit, the zoning officer or construction official shall notify the tax assessor and request an estimate of the equalized assessed value of the development that is subject to the development fee. The first payment shall be based on 50% of the estimate. At the conclusion of construction and development, the tax assessor shall confirm or modify the previously estimated equalized assessed value of the improvements associated with the development so the developer may be advised of the remaining fee to be paid prior to the issuance of a certificate of occupancy.

(b) Distribution of development fee revenues:

The Borough Municipal Housing Liaison and Borough Clerk/Administrator shall administer the distribution of money in the Affordable Housing Trust Fund in a manner consistent with this Spending Plan. The governing body shall adopt a resolution authorizing expenditure of funds consistent with the Spending Plan. Once a request has been approved by resolution, the CFO shall release the requested revenue from the AHTF for the specific use approved in the resolution.

3. Description of Anticipated Use of Affordable Housing Funds

(a) Rehabilitation

- \$300,000. The Borough proposes to use \$300,000 of the affordable housing trust funds for its municipal rehabilitation program. The Borough has adopted a Rehabilitation Program Manual and the program is being administered in accordance with the manual. Five units (maximum \$25,000 each) may be rehabilitated using funds that are anticipated over the next two years. Continuation of the program will depend upon future revenue, which is uncertain.

(b) Affordability Assistance.

- N.J.A.C. 5:99-2.5 requires that the Borough set aside a portion of all development fees collected and interest earned for the purpose of providing affordability assistance to low- and moderate-income households in affordable units included in the Borough's

fair share plan. Affordability assistance means the use of funds to render housing units more affordable to low- and moderate-income households and includes, but is not limited to, emergency repairs, down payment assistance, security deposit assistance, low-interest loans, rental assistance, assistance with homeowners association or condominium fees and special assessments, assistance with emergency repairs and rehabilitation to bring deed restricted units up to code, and any other program authorized by the department.

- Affordability assistance may also include offering a subsidy to developers of inclusionary or 100% affordable housing developments or buying down the cost of low- or moderate-income units in the Borough's fair share plan to make them affordable to very low-income households, including special needs and supportive housing opportunities.
- Stratford Borough will set aside \$205,000 for Affordability Assistance through June 30, 2035.

(c) Administrative Expenses. In accordance with N.J.A.C. 5:99-2.4(a), no more than 20% of all affordable housing trust funds, exclusive of those collected prior to July 17, 2008, to fund an RCA, shall be expended on administration. N.J.A.C. 5:99-2.4(b) and (c) provide that administrative expenses may include costs reasonably related to the determination of the fair share obligation and the development of the housing element and fair share plan and may include fees necessary to develop or implement affordable housing programs, an affirmative marketing program, and/or expenses that are reasonably necessary for compliance with the processes of the Program, costs associated with functions carried out in compliance with UHAC, including activities related to the marketing program and waitlist management, administering the placement of occupants in housing units, income qualification of households, monitoring the turnover of sale and rental units, preserving existing affordable housing, and compliance with the Division's monitoring requirements. The proportion of a municipal employee's salary related to the MHL or RCA administrator functions and fees for required educational programs, may be paid as an administrative expense from the municipal affordable housing trust fund.

- Stratford Borough projects dedicating approximately 20% of AHTF revenues to administration. The Borough estimates that an additional \$120,000 will be spent on planning and administration of the rehabilitation program, existing and proposed affordable housing units, and affordability assistance programs through the Fourth Round. If this amount is not adequate to cover the Borough's administrative costs, it will be supplemented by the operating budget. If additional AHTF revenues are collected, up to 20% may be allocated to administration.
- Administrative costs may vary from the projections set forth in the expenditure schedule, based on the needs of the Borough and the actual costs for monitoring, administering, and implementing the various programs.

(d) Other Emergent Housing Opportunities. The Borough acknowledges that there may be

emergent opportunities or unanticipated funding needs over the course of the Fourth Round. Subject to the availability of funds, the Borough will allocate funds and seek approval to fund any emergent affordable housing opportunities not included in the Borough's fair share plan in accordance with N.J.A.C. 5:99-4.1.

4. Expenditure Schedule

The Borough of Stratford intends to use affordable housing trust fund revenues for its municipal rehabilitation program, for emergency repairs, for affordability assistance to the owners of affordable housing, to assist inclusionary developers with making units available to very low income households, and for administration up to the 20% cap. The estimated expenditure schedule is as follows:

PROJECTS/ PROGRAMS	PROJECTED EXPENDITURES – AFFORDABLE HOUSING TRUST FUND JANUARY 1, 2026 THROUGH JUNE 30, 2035												Total	
	2026	2027	2028	2029	2030	2031	2032	2033	2034	1/1/35 to 6/30/35				
HOUSING ACTIVITY:														
Municipal Rehabilitation Program	75,000	50,000	25,000	75,000	50,000	25,000	0	0	0	0	0	0	0	300,000
AFFORDABILITY ASSISTANCE:													0	
Affordability Assistance Program	0	20,000	0	0	35,000	65,000	40,000	22,500	22,500	0	0	0	0	205,000
ADMINISTRATION:													0	
Other Emergent Opportunities	25,000	15,000	5,000	20,000	15,000	15,000	10,000	7,500	7,500	0	0	0	0	120,000
Total	100,000	85,000	30,000	95,000	100,000	105,000	50,000	30,000	30,000	0	0	0	0	625,000

5. Excess or Shortfall of Funds

In the event of excess funds, AHTF revenues will be allocated according to the Borough's needs such as affordability assistance or emergent opportunities. Funds that are collected in the last three years of the Fourth Round compliance period will be evaluated at that time and may be directed toward Fifth Round compliance activities. In the event of any expected or unexpected shortfall in AHTF revenues that would interfere with the Borough's ability to implement the approved Fourth Round Fair Share Plan, the Borough will revisit the Spending Plan and Fair Share Plan. Since the Borough's Fair Share compliance plan relies primarily on inclusionary redevelopment, a funding shortfall is not anticipated.

Summary

The Borough of Stratford intends to spend Affordable Housing Trust Fund revenues pursuant to N.J.A.C. 5:99 and consistent with the housing programs outlined in the Borough's Housing Element and Fair Share Plan.

The Borough had a balance of \$156,891 as of December 31, 2025 and anticipates an additional \$71,774 in revenues through June 30, 2035 for a total of \$228,665. During the Fourth Round compliance period through June 30, 2035, the Borough proposes to spend \$208,500 for housing activities and affordability assistance programs, and up to \$20,000 for administrative costs. The Borough will amend the Spending Plan and seek approval for such amendments as circumstances may require.