

Housing Plan Element and Fair Share Plan



Prepared for:

Borough of Atlantic Highlands
Monmouth County, New Jersey

Adopted by the Planning Board on _____, __ 2025

Prepared By:

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The original of this document was signed and sealed in accordance with New Jersey State Law.

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Housing Plan Element

A. Introduction

The Borough of Atlantic Highlands is a 4.5 square mile fully developed coastal community located in the east central part of New Jersey in the County of Monmouth. Middletown surrounds the Borough to the west and south, Highlands Borough to the east, and the Sandy Hook Bay to the North.

The Borough of Atlantic Highlands has prepared this Housing Plan Element and Fair Share Plan in response to New Jersey's New Affordable Housing Law P.L. 2024, C.2 (Assembly Bill 4/Senate Bill 50) and the amended New Jersey Fair Housing Act (FHA), Municipal Land Use Law, Fair Housing Act and the Affordable Housing Reform Statute, P.L. 2008, c.46. The law requires that the Department of Community Affairs (DCA) perform a calculation of regional need and municipal present and prospective obligations in accordance with the formulas established in the law. The latest legislation established new, streamlined, transparent, and more effective procedures and standards for the continued implementation of the Mount Laurel Doctrine, New Jersey's constitutional requirement that all municipalities must provide their fair share of needed affordable housing. The law governs how the Fourth Round (2025-2035) and future rounds of municipal fair share obligations are established and satisfied through changes in master plans, zoning, and other initiatives in a municipal housing plan element and fair share plan ("HPEFSP" or "Plan").

The Fair Housing Act, as amended by the new law, specifies the essential elements of the municipal housing plan, which must be designed to "achieve the goal of access to affordable housing to meet present and prospective housing needs" and pay "particular attention to low- and moderate-income housing". The elements are detailed as follows:

1. An inventory of the municipality's housing stock by age, condition, purchase or rental value, occupancy characteristics, and type, including the number of units affordable to low- and moderate-income households and substandard housing capable of being rehabilitated, and in conducting this inventory the municipality shall have access, on a confidential basis for the sole purpose of conducting the inventory, to all necessary property tax assessment records and information in the assessor's office, including but not limited to the property record cards;
2. A projection of the municipality's housing stock, including the probable future construction of low- and moderate-income housing, for the next ten years, taking into account, but not necessarily limited to, construction permits issued, approvals of applications for development and probable residential development of lands;
3. An analysis of the municipality's demographic characteristics, including but not necessarily limited to, household size, income level and age;
4. An analysis of the existing and probable future employment characteristics of the municipality;

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5. Determination of the municipality's present and prospective fair share for low- and moderate-income housing (i.e. Present Need and Prospective Need, and its capacity to accommodate its present and prospective housing needs)
6. Consideration of the lands most appropriate for construction of low- and moderate-income housing and structures most appropriate for conversion and rehabilitation for low- and moderate-income housing, including land proposed by developers committed to providing low- and moderate-income housing
7. Analysis of the extent that the municipal ordinance and other local factors advance or detract from the goal of preserving multigenerational family continuity
8. Analysis of consistency with the State Development and Redevelopment Plan including water, wastewater, stormwater, and multi-modal transportation

Additionally, the law provides for an adjustment of the Prospective Need Obligation, based on a lack of vacant land, which divides the Prospective Need into the Realistic Development Potential (RDP) to be satisfied in the Fourth Round, and the Unmet Need, to be addressed by incentivizing opportunities for affordable housing development as land becomes available. If RDP is calculated the new law requires the identification in the Plan of sufficient parcels likely to redevelopment during the current round of obligations to address at least 25% of the Fourth Round Unmet Needs through realistic zoning, or the municipality must demonstrate why it is unable to identify such parcels as realistic alternatives and zoning.

More specifically the law states that the Housing Plan Element should also include required background data, detail sites and projects slated to produce affordable housing, provides maps locating sites and portraying site constraints, includes draft and adopted zoning amendments, contains agreement with developers and evidence of site plan and use variance approvals, documents claimed credits for completed affordable housing and provides municipal revenue projects, as well as any applicable funding commitments to support affordable housing activities. These elements will be included in this plan where applicable.

This Housing Plan Element and Fair Share Plan satisfies all of the applicable requirements of New Jersey's new Affordable Housing Law P.L. 2024, C.2 (Assembly Bill 4/Senate Bill 50) and the amended New Jersey Fair Housing Act (FHA) MLUL, the FHA, N.J.A.C. 5:93.

History of Borough of Atlantic Highlands Affordable Housing Compliance

The Borough of Atlantic Highlands adopted its first Third Round Housing Element and Fair Share Plan in 2005, at which time the Borough petitioned COAH to have the plan approved via Substantive Certification. The Borough amended the Plan in December 2006, and re-petitioned COAH for Substantive Certification. Before the Plan could be approved, COAH's 2004 Round 3 regulations were invalidated.

COAH adopted new Round 3 rules in September 2008, at which time the Borough Planning Board adopted, and the Borough Council endorsed, an Amended Housing Element and Fair Share Plan in the fall of 2008. Before the amended Plan could be approved, the 2008 COAH regulations were invalidated once again.

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COAH unsuccessfully attempted to adopt a third iteration of Round 3 regulations in the fall of 2014, leading to the Supreme Court issuing its Mount Laurel IV decision.

In response to Mount Laurel IV, Atlantic Highlands filed a Declaratory Judgement Action on July 2, 2015, to have a Housing Element and Fair Share Plan approved by the Court, and simultaneously filed a motion of temporary immunity. On September 4, 2015, the Court entered an order affirming the Borough's immunity, and has since entered additional orders extending the Borough's immunity, which is still in full force and effect.

On January 26, 2018, the Borough executed a Settlement Agreement with Fair Share Housing Center ("FSHC"; hereinafter the "FSHC Settlement Agreement"). The Court then entered an Order to set the date for a Fairness Hearing on May 8, 2018 to approve the FSHC Settlement Agreement. At the Fairness Hearing, the Settlement Agreement was approved, which was memorialized via an Order entered by the Court on May 24, 2018.

In response to the Court's May 8, 2018 Order and the FSHC Settlement Agreement, the Borough prepared a Third Round Housing Element and Fair Share Plan, which the Borough Planning Board adopted on September 13, 2018, and was endorsed by the Borough Council on September 26, 2018 (hereinafter "2018 Housing Element and Fair Share Plan"). Subsequently, on March 29, 2019, the Borough entered into a Settlement Agreement between the Borough of Atlantic Highlands and Objectors to the Borough's Housing Element and Fair Share Plan regarding the 21 Leonard Avenue Site to reduce the 21 Leonard Avenue project from two (2) duplexes with four (4) affordable units to one (1) duplex with two (2) affordable units. To ensure that the Borough's Realistic Development Potential (RDP) of 42 remained fully addressed, the Borough adopted a 2019 Amended Housing Element and Fair Share Plan to implement these changes.

On January 13, 2025 the Borough Adopted Resolution 035-2025, establishing the Borough's Fourth Round Present and Prospective Affordable housing obligations, through which the Borough acknowledged and adopted a Fourth Round Present need of zero (0) affordable housing units, and a Fourth Round Prospective Need obligation of forty eight (48) affordable housing units. Subsequently, on January 15, 2025, the Borough filed a Declaratory Judgment with the Superior Court of New Jersey Law Division, declaring that it had accepted the above referenced obligations (Please see Appendix A). On April 1, 2025, Hon. Judge Linda Grasso Jones, J.S.C., issued an order fixing the Borough's Fourth Round affordable housing obligations at a Present Need of zero (0) affordable housing units, and a Fourth Round Prospective Need obligation of forty-eight (48) affordable housing units. This Housing Plan Element and Fair Share Plan fully addresses the cumulative Prior Round, Third Round and Fourth Round obligations in accordance with applicable law.

B. Inventory of Housing Stock

Age of Housing Stock

The vast majority of the Borough of Atlantic Highlands' housing stock was constructed before 1979, indicating an older, establishing the Borough's Fourth Round Present and Prospective housing stock. Nearly three-quarters of the housing stock, represented by the 2023 ACS, was built before 1979 (73%). Approximately 15.9% of the housing units, or 321 units, were constructed after 2000, indicating that the housing stock in the Borough of Atlantic Highlands is generally older.

Table 1		
Housing Characteristics		
Time of Construction	Number of Units	Percent of Units
Built 2020 or later	0	0.00%
Built 2010 to 2019	133	6.57%
Built 2000 to 2009	188	9.29%
Built 1980 to 1999	209	10.33%
Built 1960 to 1979	475	23.48%
Built 1940 to 1959	415	20.51%
1939 or Earlier	603	29.81%
Total	2,023	100.00%
Source: 2023 American Community Survey 5-year Estimates		

Condition of Housing Stock

This Plan utilizes the 2023 American Community Survey 5-Year Estimates, where available, to estimate the number of substandard housing units in the Borough of Atlantic Highlands that are occupied by low- and moderate-income households. ACS data considers the following factors to estimate the number of substandard housing units:

Persons per room: 1.01 or more persons per room is an index of overcrowding.

Plumbing facilities: Inadequate plumbing facilities are indicated by either a lack of exclusive use of plumbing facilities or incomplete plumbing facilities.

Kitchen facilities: Inadequate kitchen facilities are indicated by shared use of a kitchen or the lack of a sink with piped water, a stove or a refrigerator.

The 2023 ACS 5-year estimates indicators presented were utilized to estimate the presence of substandard housing within the Borough of Atlantic Highlands.

Table 2, below, depicts approximately nine substandard units.

Table 2		
Condition of Housing Stock		
	Total	Percentage
Number of Persons per Room		
1.01 or more	9	0.40%
Plumbing Facilities		
Occupied Units with Complete Plumbing Facilities	2,023	100.00%
Units Lacking Complete Plumbing Facilities	0	0.00%
Kitchen Equipment		
Occupied Units with Complete Kitchen Facilities	2,023	100.00%
Lacking Complete Kitchen Facilities	0	0.00%
Total Occupied Units	2,023	100.00%
Source: 2023 American Community Survey 5-year Estimates		

Purchase or Rental Value of Housing Stock

The median value of housing in the Borough of Atlantic Highlands was \$615,300, slightly less than the Monmouth County median value of housing of \$628,000. Table 3 below shows the percentage of housing units in each value category as presented within the 2023 ACS.

Table 3		
Value of Owner-Occupied Units		
Value	Units	Percentage
Less than \$50,000	32	2.23%
\$50,000 to \$99,999	9	0.63%
\$100,000 to \$149,999	0	0.00%
\$150,000 to \$199,999	9	0.63%
\$200,000 to \$299,999	182	12.68%
\$300,000 to \$499,999	223	15.54%
\$500,000 to \$999,999	806	56.17%
\$1,000,000 or more	174	12.13%
Total	1,435	100.00%
Atlantic Highlands Median (dollars)	\$615,300	
Monmouth County Median (dollars)	\$628,000	
Source: 2023 American Community Survey 5-year Estimates		

The median gross rent rate in the Borough of Atlantic Highlands was \$1,900.00, slightly higher (8%) than the median rental rate in Monmouth County, which was \$1,752.

The majority of renters are paying between \$1,500 and \$2,999 per month, capturing approximately 59% of renters. Nearly twenty-two percent of rental units (131 units) pay between \$2,500 and \$2,999 monthly. The second largest number of units (21%, 125 units) fall within a less expensive rental range of \$1,500 to \$1,999. Approximately 93 units, or 16%, pay between \$2,000 and \$2,499 monthly.

Table 4 Cost of Rent		
Occupied Units Paying Rent	Units	Percentage
Less than \$500	86	15%
\$500-\$999	29	5%
\$1,000-\$1,499	79	13%
\$1,500-\$1,999	125	21%
\$2,000-\$2,499	93	16%
\$2,500-\$2,999	131	22%
\$3,000 or more	45	8%
No Rent Paid	0	0%
Total Occupied Units Paying Rent	588	100.00%
Atlantic Highlands Median (dollars)	\$1,900	
Monmouth County Median	\$1,752	
Source: 2023 American Community Survey 5-year Estimates		

Occupancy Characteristics and Types of Housing Units

According to the 2023 American Community Survey (ACS), out of the 2,084 total housing units in the Borough, 2,023 were occupied units (approximately 97 percent). Of the 2,023 occupied housing units in the Borough, 1,435 (69 percent) were owner-occupied and 588 (28 percent) were rentals.

Table 5a		
Owner Occupied/Rentals and Total Occupied Units		
	Total	Percentage
Housing Units		
Total Number of Housing Units	2,084	100%
Occupied Units		
Total Number of Occupied Housing Units	2,023	97%
Owner-Occupied		
Total Number of Owner-Occupied Housing Units	1,435	69%
Renter-Occupied		
Total Number of Renter-Occupied Housing Units	588	28%
Source: 2023 American Community Survey 5-year Estimates		

As of the 2023 ACS, there were 2,084 housing units in the Borough of Atlantic Highlands, shown in Table 5b. Single-family detached units comprise slightly more than half of the housing stock, with 65% (1,354 units). The second largest category is represented by 20 units or more, with nearly a quarter of all units at 18 percent (365 units).

Table 5b		
Housing Units		
Units in Structure	Number	Percentage
1-Unit Detached	1,354	65%
1-Unit Attached	50	2%
2 Units	70	3%
3 or 4 Units	107	5%
5 to 9 Units	63	3%
10 to 19 Units	75	4%
20 Units or more	365	18%
Mobile Home	0	0%
Other	0	0%
Total	2,084	100.00%
Source: 2023 American Community Survey 5-year Estimates		

Units Affordable to Low- and Moderate- Income Households

Low-income households are defined as those earning less than or equal to 50 percent of a

regional median income. Moderate-income households earn more than 50 percent of the regional median income but less than 80 percent of the regional median income.

Formerly issued by COAH, the Affordable Housing Professionals of New Jersey (AHPNJ) publishes annual income limits, which define low- and moderate-income limits based on household size from one (1) occupant up to eight (8) persons per household.

Housing units are to be priced to be affordable to households who could reasonably be expected to live within the housing units. For example, the current affordable housing rules require that an efficiency unit be affordable to a household of one (1) as shown below in Table 6.

Table 6					
2024 AHPNJ Income Limits for Monmouth County (Region 4)					
	1 Person	2 Person	3 Person	4 Person	5 Person
Median Income	\$91,038	\$104,043	\$117,048	\$130,054	\$140,458
Moderate (80% of Median)	\$72,730	\$83,234	\$93,639	\$104,043	\$112,367
Low (50% of Median)	\$45,519	\$52,022	\$58,524	\$65,027	\$70,229
Very Low (30% of Median)	\$27,311	\$31,213	\$35,115	\$39,016	\$42,137
Source: April 2024, AHPNJ 2024 Affordable Housing Regional Income Limits by Household Size					

To be affordable, a household should not pay more than 28 percent of its gross income on principal, interest, taxes, and insurance, following a minimum down payment of 5 percent. A rental unit is affordable if the household pays no more than 30 percent of its income on rent and utilities. The following tables display the number of homeowners and renters who pay more than 30% of their gross income on mortgages or rent.

Approximately 22% (455) of households are paying 30% or more for housing costs as a percentage of household income in the Borough of Atlantic Highlands as of the 2023 ACS, indicating that housing is not affordable to a significant number of households in the Borough.

Table 7		
Monthly Housing Costs as a Percentage of Household Income in Occupied Units		
Percentage of Income	Number	Percentage
Less than 20%	904	45%
20% to 29%	664	33%
30% or more	455	22%
Zero or negative income	0	0%
Not Computed	0	0%
Total	2,023	100.00%
Source: 2023 American Community Survey 5-year Estimates		

C. Projected Housing Stock

Since 2000, the Borough of Atlantic Highlands has issued building permits for 113 housing units. The Borough also issued permits to demolish 70 units during the time period from 2000 through February 2025, as shown within Table 8 below.

Table 8 Dwelling Units Authorized			
Year	Residential Building Permits Issued	Residential Demolitions	Total Added
2000	1	0	1
2001	0	0	0
2002	4	1	3
2003	0	0	0
2004	5	1	4
2005	9	0	9
2006	1	0	1
2007	3	0	3
2008	3	0	3
2009	6	0	6
2010	1	0	1
2011	2	2	0
2012	1	0	1
2013	6	3	3
2014	5	7	-2
2015	7	10	-3
2016	3	3	0
2017	15	15	0
2018	17	10	7
2019	8	7	1
2020	3	5	-2
2021	2	4	-2
2022	0	1	-1
2023	3	1	2
2024	7	0	7
2025 YTD	1	0	1
Total	113	70	43
Source: New Jersey Department of Labor and Workforce Development, New Jersey Department of Community Affairs			

D. Municipality's Demographic Characteristics

The population history of the Borough of Atlantic Highlands from 1950 to 2023 is a community that experienced dramatic growth during the 1950s suburban expansion, reached its peak population in 1970, underwent a significant decline through 1990, and has since stabilized with minor fluctuations. The current population of around 4,409 (as of 2023) represents approximately 86% of the borough's historical peak.

These population trends reflect broader regional patterns affecting many northeastern suburban communities, including the post-war suburban boom, subsequent urban-suburban demographic shifts, and the maturation of established communities. Despite the fluctuations over the past several decades, the Borough of Atlantic Highlands has maintained a relatively stable population base since 2010, suggesting a period of demographic equilibrium has been reached.

Table 9. Population Trends									
Year	Atlantic Highlands			Monmouth County			New Jersey		
	Population	Change		Population	Change		Population*	Change	
		Number	%		Number	%		Number	%
1930	2,000	-	-	147,209		-	4,041,334	-	-
1940	2,335	335	17%	161,238	14,029	10%	4,160,165	118,831	3%
1950	3,083	748	32%	225,327	64,089	40%	4,835,329	675,164	16%
1960	4,119	1,036	34%	334,401	109,074	48%	6,066,782	1,231,453	25%
1970	5,102	983	24%	461,849	127,448	38%	7,171,112	1,104,330	18%
1980	4,950	-152	-3%	503,173	41,324	9%	7,365,011	193,899	3%
1990	4,629	-321	-7%	553,124	49,951	10%	7,730,188	365,177	5%
2000	4,705	76	2%	615,301	62,177	11%	8,414,350	684,162	9%
2010	4,442	-263	-6%	630,380	15,079	3%	8,791,894	377,544	4%
2020	4,414	-28	-1%	620,821	-9,559	-2%	9,288,994	497,100	6%
2023	4,409	-5	0%	642,799	21,978	4%	9,290,841	1,847	0%
2050 Projection/1	4,652	243	6%	669,624	26,825	4%	9,733,400	442,559	5%

Sources: American Community Survey, New Jersey Department of Labor, North Jersey Transportation Planning Authority, U.S. Census Bureau

State of New Jersey Population projects per the New Jersey Department of Community Affairs 2034 Estimates.

The median age in the Borough of Atlantic Highlands (42.5 years) is slightly lower than the median age of Monmouth County (43.4 years). The Borough of Atlantic Highlands population is concentrated in the 45 to 54 and 65 and over age brackets, representing 20% of the Borough's population, greater than Monmouth County's respective 15%. The percentage of people within age groups under 25 is lower in all categories in the Borough compared to the County as a whole.

Table 10.a Population by Age 2010 and 2020, Atlantic Highlands						
Population	2010		2020		Change, 2010 to 2020	
	Number	Percent	Number	Percent	Number	Percent Change
Total	4,442	100%	4,312	100%	(130)	-3%
Under 5 years	240	5%	148	5%	(92)	-38%
5 to 14	582	13%	519	11%	(63)	-11%
15 to 24	569	13%	488	9%	(81)	-14%
25 to 34	204	5%	457	11%	253	124%
35 to 44	760	17%	395	14%	(365)	-48%
45 to 54	986	22%	801	20%	(185)	-19%
55 to 64	444	10%	716	15%	272	61%
65 and over	662	15%	788	16%	126	19%

Source: U.S. Census Bureau, 2010, 2020, ACS 5-Year Estimates

Table 10.b Population by Age 2000 and 2010, Monmouth County						
Population	2010		2020		Change, 2000 to 2010	
	Number	Percent	Number	Percent	Number	Percent
Total population	630,380	100%	620,821	100%	(9,559)	-1.52%
Under 5 years	35,802	6%	30,774	5%	(5,028)	-14.04%
5 to 14	88,564	14%	75,016	12%	(13,548)	-15.30%
15 to 24	77,886	12%	77,910	13%	24	0.03%
25 to 34	62,811	10%	66,655	11%	3,844	6.12%
35 to 44	93,589	15%	71,051	11%	(22,538)	-24.08%
45 to 54	108,663	17%	92,203	15%	(16,460)	-15.15%
55 to 64	77,258	12%	97,451	16%	20,193	26.14%
65 and over	84,167	13%	109,761	18%	25,594	30.41%

Source: U.S. Census Bureau, 2010, 2020, ACS 5-Year Estimates

The 2023 ACS indicates that the median income of Borough of Atlantic Highlands residents (\$125,438) is slightly higher than the median income for Monmouth County (\$118,008) and significantly higher than the State median income of \$77,719. The per capita income of Borough of Atlantic Highlands residents is \$82,909, which is also higher than both the Monmouth County per capita income of \$118,008 and the State per capita income of \$43,313.

Approximately 35.7 percent of Borough of Atlantic Highlands households earned \$100,000 or less

in 2023. The corresponding percentage for Monmouth County is 42.1 percent. A distribution of households by income for the Borough of Atlantic Highlands and Monmouth County is presented within Table 11.

Table 11		
Households by Income		
Income Level	Atlantic Highlands Borough	Monmouth County
Less than \$10,000	0.40%	3.00%
\$10,000-\$14,999	1.60%	2.10%
\$15,000-\$24,999	5.80%	4.50%
\$25,000-\$34,999	2.10%	4.10%
\$35,000-\$49,999	6.00%	7.10%
\$50,000-\$74,999	10.70%	11.20%
\$75,000-\$99,999	9.10%	10.10%
\$100,000-\$149,999	25.10%	18.40%
\$150,000-\$199,999	6.60%	12.20%
\$200,000 or more	32.50%	27.20%
Median Household Income	\$125,438	\$118,008
Per Capita Income	\$82,909	\$63,729
Number of Households	2,023	252,995
Source: 2023 American Community Survey 5-year Estimates		

As per the 2023 ACS, the average household size in the Borough of Atlantic Highlands was 2.18 persons per household, and the average family size was 2.85 persons. There was a total of 1,435 households in the Borough. Of those, 67 percent (960) were family households, and 33 percent (475) were nonfamily households. Further details regarding household types are illustrated within Table 12 below.

Table 12 Households by Type		
Household Type	Number	Percentage
Total Occupied Households	1,435	100%
Family Households	960	67%
Married-couple family	790	55%
Female householder, no spouse present	120	8%
Male householder, no spouse present	50	3%
Nonfamily Households	475	33%
Householder living alone	412	29%
Householder not living alone	63	4%
Average Household Size	2.34	
Source: 2023 American Community Survey 5-year Estimates		

E. Employment Characteristics

The 2023 ACS reports on the work activity of residents 16 years and older. Of the 2,244 employed residents, 54.4% of the workforce was male and 45.5% was female. The average commuting time of a Borough of Atlantic Highlands worker was 38.8 minutes. The majority (83.0%) of Borough residents work within the private sector, as shown below in Table 13.

Table 13 Classification of Workers		
Class	Number	Percentage
Private Wage and Salary	1,862	83.0%
Government Workers	241	10.7%
Self Employed	132	5.9%
Unpaid Family Workers	9	0.4%
Total Employed	2,244	100%
Source: 2023 American Community Survey 5-year Estimates		

An analysis of the employed (over the age of 16) indicates that Borough of Atlantic Highlands workers were involved in a broad array of economic sectors. The highest concentrations of workers are employed in educational, health, and social assistance at 25.9 percent of the workforce, and in professional, scientific, management, and administrative, and waste management services at 17.3 percent, as shown below within Table 14.

Table 14 Workforce by Sector		
Sector	Number of Employees	Percentage of Workforce
Agriculture, forestry, fishing and hunting, and mining	0	0.0%
Construction	91	4.1%
Manufacturing	199	8.9%
Wholesale trade	20	0.9%
Retail trade	310	13.8%
Transportation and warehousing, and utilities	85	3.8%
Information	68	3.0%
Finance and insurance, and real estate and rental and leasing	218	9.7%
Professional, scientific, and management, and administrative and waste management services	388	17.3%
Educational services, and health care and social assistance	581	25.9%
Arts, entertainment, and recreation, and accommodation and food services	156	7.0%
Other services, except public administration	65	2.9%
Public administration	63	2.8%
Total	2,244	100.0%
Source: 2023 American Community Survey 5-year Estimates		

The workforce occupation characteristics in the Borough of Atlantic Highlands were compared to those of Monmouth County. As indicated in Table 15 below, the occupation characteristics of the Borough's residents generally compare with those of other workers in the County. Both the Borough and County Occupational Characteristics are summarized below.

Table 15 Occupation Characteristics				
	Atlantic Highlands	Percent	Monmouth County	Percent
Civilian Employed Population 16 years and older	2,244	100%	336,135	100.0%
Management, Business, Science, and Arts Occupations	1,234	55%	173,914	51.7%
Management, Business, and Financial Occupations	630	28%	80,457	23.9%
Computer, Engineering, and Science Occupations	127	5.7%	23,916	7.1%
Education, Legal, Community Service, Arts and Media Occupations	282	12.6%	45,705	13.6%
Healthcare Practitioners and Technical Occupations	195	8.7%	23,836	7.1%
Service Occupations	208	9.3%	46,375	13.8%
Healthcare Support Occupations	8	0.4%	6,448	1.9%
Protective Service Occupations	34	1.5%	7,433	2.2%
Food Preparation and Serving Related Occupations	68	3.0%	15,551	4.6%
Building and Grounds Cleaning and Maintenance Occupations	10	0.4%	8,373	2.5%
Personal Care and Service Occupations	88	3.9%	8,570	2.5%
Sales and Office Occupations	600	26.7%	66,137	19.7%
Sales and Related Occupations	287	12.8%	35,043	10.4%
Office and Administrative Support Occupations	313	13.9%	31,094	9.3%
Natural Resources, Construction and Maintenance Occupations	120	5.3%	26,315	7.8%
Farming, Fishing, and Forestry Occupations	10	0.4%	991	0.3%
Construction and Extraction Occupations	72	3.2%	17,640	5.2%
Installation, Maintenance, and Repair Occupations	38	1.7%	7,684	2.3%
Production, Transportation, and Material Moving Occupations	82	3.7%	23,394	7.0%
Production Occupations	35	1.6%	7,301	2.2%
Transportation Occupations	20	0.9%	8,758	2.6%
Material Moving Occupations	27	1.2%	7,335	2.2%
Source: 2023 American Community Survey 5-year Estimates				

In addition, in order to understand what implications this employment data has for the Borough and understand what the employment field and area trends are for the Borough of Atlantic Highlands and Monmouth County, the New Jersey Department of Labor (“NJDOLE”) has prepared projections, which analyze the expected increase or decrease in a particular occupation by the year 2032. This data has been summarized and is illustrated within Table 16.

As indicated above, it is projected that in 2032 employment will have increased or remain stable in almost all of industries and overall, the economy will grow by 7.564 (3%) jobs. Health care and social assistance, health care practitioners, community and social services are projected to realize the largest growth increase during the 2022-2032 time period.

Table 16**Monmouth County Projected Employment**

Occupations	Base Year Employment (2022)	Projected Employment (2032)	Numeric Change	Percent Change	Outlook
Architecture and Engineering	2,998	3,175	177	6%	Stable
Arts, Design, Entertainment, Sports and Media	4,969	5,399	430	9%	Stable
Building and Grounds Cleaning and Maintenance	9,550	10,182	632	7%	Stable
Business and Financial Operations	17,098	18,193	1095	6%	Stable
Community and Social Service	5,059	5,736	677	13%	Growing
Computer and Mathematical	9,906	11,530	1624	16%	Growing
Construction and Extraction	12,979	13,796	817	6%	Stable
Educational Instruction and Library	19,449	20,742	1293	7%	Stable
Farming, Fishing, and Forestry Occupations	189	194	5	3%	Stable
Food Preparation and Serving Related	26,081	27,848	1767	7%	Stable
Healthcare Practitioners and Technical	20,343	22,908	2565	13%	Growing
Healthcare Support	16,009	18,855	2846	18%	Growing
Installation, Maintenance, and Repair	10,842	11,786	944	9%	Stable
Legal	2,331	2,420	89	4%	Stable
Life, Physical and Social Science	2,571	2,785	214	8%	Stable
Management	21,225	23,372	2147	10%	Growing
Office and Administrative Support	38,445	37,453	-992	-3%	Declining
Personal Care and Service Occupations	13,445	15,572	2127	16%	Growing
Production Occupations	8,864	9,076	212	2%	Stable
Protective Service	6,779	7,248	469	7%	Stable
Sales and Related	29,262	29,346	84	0%	Stable
Transportation and Materials Moving	23,647	25,910	2263	10%	Growing
Total (All Occupations)	302,041	323,526	21,485.00	7%	

Source: New Jersey Department of Labor and Workforce Development, 2025

F. Analysis

Preservation of Multigenerational Continuity

The 2024 FHA requires an analysis of the extent to which municipal ordinances and other local factors advance or detract from the goal of preserving multigenerational family continuity as expressed in the recommendations of the Multigenerational Family Housing Continuity Commission, adopted pursuant to section 1, subsection f., paragraph (1) of P.L.2021, c. 273 (C.52:27D-329.20). The Commission has the primary goal of enabling senior citizens to reside at the homes of their extended families, thereby preserving and enhancing multigenerational family continuity.

A review of the Borough's ordinances and housing stock indicates a diverse array of permitted and existing residential unit types. The Borough also maintains a significant number of large single-family homes, suitable for incorporating accessory dwelling units. In addition, the Borough hosts the Springpoint Living project, which contains 10 age-restricted rentals.

State Development and Redevelopment Plan Consistency

The Borough's Fourth Round Housing Plan Element and Fair Share Plan is consistent with the 2001 State Development and Redevelopment Plan (SDRP) as the approved and proposed projects outlined in the Fair Share Plan provide ample opportunity for the construction of affordable housing. All of Atlantic Highlands is designated as a Metropolitan Planning Area (PA1). Pursuant to the SDRP, PA1 is the preferred location for redevelopment and compact growth. The development of dense, affordable housing in PA1 is consistent with the overall State Development and Redevelopment Plan goal to direct redevelopment and growth into existing "centers" where infrastructure can support the development and services, such as open space, retail shopping, public transportation, and schools, are within walking distance. Adequate sewer and water capacity are available for development in Atlantic Highlands. The Borough is not located within the Pinelands, Highlands, or Meadowlands planning areas.

Vacant Land Analysis

Municipalities can request an adjustment to their obligation based on the determination that there is not sufficient vacant or developable land within the municipality. As permitted by N.J.A.C. 5:93-4.2, P.L. 2024, C.2, and applicable sections of (N.J.S.A. 52:27D-301 et seq., a municipality can prepare a Vacant Land Analysis ("VLA") that examines parcels available for development. After such an analysis is performed, a Realistic Development Potential (or "RDP") is determined based on the amount of actual developable land.

The Borough of Atlantic Highlands conducted a comprehensive Fourth Round Vacant Land Analysis (VLA) to assess its realistic development potential and identify land available to meet its affordable housing obligations. This assessment reviewed tax records, zoning designations, and available NJDEP mapping depicting physical site constraints such as wetlands, flood zones, and parcel size thresholds.

The Borough identified a number of parcels coded as vacant or underutilized in the MOD IV Tax Assessment data. Upon analysis of these parcels, many of the sites were determined to be unsuitable for development due to environmental constraints that would preclude development on all or a portion of the property, insufficient lot size, steep slopes and risk of landslide, lack of access to appropriate streets, or other factors. Many properties were less than 0.83 acres and/or fell within regulated environmentally sensitive areas under DEP jurisdiction. As such, they were excluded from the analysis of developable land. None of the reviewed parcels maintained sufficient potentially developable acreage to satisfy the minimum threshold area of 0.83 acres, which would support a minimum of five (5) residential units at a density of six (6) units per acre. Based upon the results of the VLA, the Borough of Atlantic Highlands has a total Fourth

Round Realistic Development Potential (RDP) of zero (0) units. The full VLA analysis and mapping is included in Appendix B.

The VLA analysis also included a consideration of lands that may be most appropriate for construction of low- and moderate-income housing and of the existing structures most appropriate for conversion to or rehabilitation for such housing. The results of this additional analysis are reflected within the Fair Share Plan portion of this Plan.

Fair Share Plan

A. Fair Share Obligation

This Housing Plan Element and Fair Share Plan satisfies all applicable requirements set forth within P.L. 2024, C.2 (Assembly Bill 4/Senate Bill 50) and the amended New Jersey Fair Housing Act (N.J.S.A. 52:27D-301 et seq.), N.J.A.C. 5:93, N.J.A.C. 5:97, and other applicable regulations. This Plan demonstrates how the Borough has provided, and will continue to provide, its fair share of the region's affordable housing need. In accordance with the requirements set forth in the documents noted above, this Plan includes a comprehensive Fair Share Plan for the Borough's cumulative 1987-2035 affordable housing obligation. In addition, this Plan sets forth strategies for implementation to be utilized to implement this Fair Share Plan.

Atlantic Highlands's fair share obligations are broken down into a Present Need (Rehabilitation Obligation), Prior Round Obligation (1987-1999), Third Round obligation (1999-2025), and Fourth Round obligation (2025-2035), each of which are summarized below. As stated previously, the Borough has accepted the Fourth Round affordable housing obligations promulgated by the New Jersey Department of Community Affairs ("NJDCA"), which include Fourth Round Present Need and Prospective Need obligations of 0 and 48 units, respectively.

A Fourth Round Vacant Land Adjustment ("VLA") has been prepared and applied to the Borough's Fourth Round Prospective Need obligation. The VLA demonstrates that the Borough's Fourth Round Realistic Development Potential ("RDP") is zero (0) units. Therefore, the Borough has a Fourth Round Unmet Need of 48 units.

Table 17: Cumulative 1987-2035 Affordable Housing Obligations	Number of Units
Fourth Round Present Need (Rehabilitation Obligation)	0
Prior Round Obligation (1987-1999)	86
Third Round Prospective Need (1999-2025)	207
Fourth Round Prospective Need (2025-2035)	48
Cumulative Obligation (1987-2035)	341
Realistic Development Potential and Unmet Need	Number of Units
Prior Round and Third Round Realistic Development Potential (RDP)	42
Prior and Third Round Unmet Need	251
Fourth Round Realistic Development Potential (RDP)	0
Fourth Round Unmet Need	48

Please note that an analysis of lands appropriate for affordable housing was conducted during the preparation of the Vacant Land Adjustment analysis and this Fair Share Plan. The lands most suitable for affordable housing include the parcels outlined within the projects below.

Satisfaction of Present Need (Rehabilitation Obligation)

The Borough has a Fourth Round Present Need (Rehabilitation Obligation) of 0 units. While Atlantic Highlands has no Fourth Round Present Need obligation, the Borough anticipates that some units may be rehabilitated through the Monmouth County Home Improvement Program during the 2025-2035 time period

Satisfaction of Prior Round and Third Round Obligations

As mentioned previously, the Borough has an adopted Third Round HEFSP, which has been fully implemented. A copy of the May 2019 Third Round Amended Housing Plan Element and Fair Share Plan can be viewed at the Borough Clerk's office. A summary of the compliance mechanisms utilized within the 2019 Third Round Amended HEFSP to address the Prior and Third Round RDP is included below.

Atlantic Highlands fully satisfied its Prior and Third Round RDP via the following mechanisms:

Table 18: Mechanisms to Address 42-Unit RDP			
Project Name	# of Units	Development Type	Status
Springpoint Living Project	10	Age-Restricted Rentals	Constructed
95 First Avenue	1	Family Rental	Constructed
Memorial Parkway Habitat for Humanity Project	2	Family Rental/ Family For Sale	Constructed
35 First Avenue/2 Hennessey Blvd. Project	5	Family Rental	Constructed
60 First Avenue Project	2	Family Rental	Constructed
44-48 First Avenue Project	3	Family Rental	Constructed
158 First Avenue Project	4	Family Rental	Constructed
21 Leonard Avenue Habitat for Humanity Project	2	Family Rental/ Family For Sale	Constructed
15 West Lincoln Avenue Project	2	Family Rental	Constructed
Total Units	31	-	-
Rental Bonus	11	-	-
Total Units & Credits	42	-	-

Detailed descriptions of the projects listed above are included within the Amended 2019 Third Round HEFSP. If any additional crediting documentation for the above that has not already been provided to the NJDCA or the court is needed, it will be provided to follow, subsequent to the Adoption of this Plan.

Addressing Prior Round and Third Round Unmet Need

According to the FSHC Settlement Agreement, the Borough has an unmet need of 251 units. The unmet need combines the Prior Round (1987-1999) and Gap + Prospective Need (1999-2025), exclusive of the RDP. The Borough has addressed its Third Round Unmet Need by utilizing the mechanisms outlined within the 2019 Amended HEFSP, which are summarized below:

- **Springpoint Living Project (Block 103 Lot 1.01):** Springpoint Living is a constructed and occupied age-restricted development located at 202 First Avenue. While 10 affordable units from this project have been applied to the Prior and Third Round RDP, the remaining forty-seven (47) age restricted affordable rental units located in this project will be applied to help address the Borough's unmet need.
- **Modification to the Borough's Office-Residential (OR) Zone:** The Borough has amended its Schedule of Uses to permit mixed-use commercial/residential development as a conditional use in the OR: Office-Residential Zone.
- **Modification of the Borough's existing Set-Aside Ordinance for the CBD, HBD, LI and R-TH zones:** The Borough currently permits multi-family and/or mixed-use development within the CBD: Central Business District, HBD: Historic Business District, LI: Light Industrial District, and R-TH: Townhouse Residential District. Within these zones, a twenty percent (20%) affordable housing set-aside is required. The Borough has amended this existing set-aside Ordinance to include the OR: Office-Residential District.
- **Affordable Housing Set-aside Ordinance:** The existing set-aside ordinance has been amended to require the compliant bedroom mixes and income distribution as per the Uniform Housing Affordable Controls (UHAC), with the exception that in lieu of ten percent (10%) of affordable units in rental projects being required to be affordable to households earning at or below thirty-five (35%) of the regional median household income by household size, thirteen (13%) of affordable units in such projects shall be required to be affordable to households earning at or below thirty percent (30%) of the regional median household income by household size.
- **Borough-Wide Mandatory Set-Aside Ordinance ("MSO"):** The Borough has adopted a Borough-wide Mandatory Set-Aside Ordinance (MSO), which requires that any site that benefits from a rezoning, variance or redevelopment plan approved by the Borough that results in multi-family residential development of five (5) dwelling units or more shall require an affordable housing set-aside of twenty percent (20%). The MSO does not give any developer the right to any such rezoning, variance, redevelopment designation or other relief, or establish any obligation on the part of Atlantic Highlands to grant such rezoning, variance, redevelopment designation or other relief. The MSO does not apply to the CBD, HBD, LI, R-TH or OR zones.

Satisfaction of Fourth Round Obligation

DCA determined that the obligation for Atlantic Highlands for the Fourth Round is 48 units, which was accepted by the Borough in its binding resolution. As noted previously, the Borough has applied a vacant land adjustment to this obligation, which establishes a Fourth Round RDP of 0 units. However, the

Amended FHA requires that any municipality that receives an adjustment of its prospective need obligations for the fourth round based on a lack of vacant land shall as part of the process of adopting and implementing its housing element and fair share plan identify sufficient parcels likely to redevelop during the current round of obligations to address at least 25 percent of the prospective need obligation that has been adjusted, and adopt realistic zoning that allows for such adjusted obligation, or demonstrate why the municipality is unable to do so (hereinafter referred to as the “25 Percent Requirement”). This would create a requirement to create a realistic opportunity for 12 units.

Due to the ambiguity of the 25 Percent Language in the Amended FHA, there are at least three interpretations of what the “adjusted number” referred to in the statute means for purposes of calculating the 25%; however, regardless of what the 25 Percent Language is adjudicated to be by the Program and/or an appellate ruling from the Courts, the Borough of Atlantic Highlands has already adopted inclusionary zoning ordinances and overlay zoning that will capture additional affordable units as density increases over time. Both of these mechanisms and the projects noted below will be applied to address the Unmet Need obligation for the Fourth Round. Crediting to address the first 12 units of the Unmet Need is shown below; however, please note that the set-aside ordinances listed below are anticipated to generate additional units beyond the 12 units shown below.

Table 19: Plan to Address Unmet Need Obligation						
Compliance Mechanism	Rental or Sale	Status	Family or Age-Restricted	Units	Bonus Credits	Total Credits
Carton Brewery Conversion	TBD	Proposed	Family	2	0*	2
Harborside Conversion	TBD	Proposed	Family	2	0*	2
65 First Avenue	TBD	Under Construction	Family	3	0*	3
Existing Set-Aside Ordinance for CBD, HBD, LI & R-TH Zone	-	Adopted	-	5	0*	5
Borough-Wide Set-Aside Ordinance	-	Adopted	-	-	-	-
Total	-	-	-	12	0	12

* Upon construction of affordable units the Borough reserves the right to claim bonus credits, if applicable.

Site Suitability Analysis

The following site suitability analyses have been prepared for the sites proposed to be applied toward satisfying portions of the unmet need, as noted in the Table above.

Carton Brewery Conversion

The Carton Brewery site, located at 120 First Avenue, is slated to be converted to a mixed-use development containing ground floor commercial uses with residential units above. The residential component includes 10 residential units with a required set-aside of two (2) units for low- and moderate-income households. The subject site encompasses Block 99, Lots 7 and 9.

The site is available, approvable, developable, and suitable as defined in N.J.A.C. 5:93-1.3.

☑ Available site: The site is under private ownership and the developer has expressed interest in redeveloping the site via the submission of conceptual plans to the Borough, which are included in the Appendices of this Plan.

☑ Suitable site: The site is suitable as defined in N.J.A.C. 5:93-1.3, which indicates that a suitable site is one which is adjacent to compatible uses, has access to appropriate streets and is consistent with environmental policies in N.J.A.C. 5:93-4.

- *The site is adjacent to compatible land uses and has access to appropriate streets.* The site is bounded by predominantly non-residential uses to the north, south and west, and single-family residential uses to the east; however, as the proposed project is envisioned to be a three-story building, the structure and overall development is anticipated to be compatible with all surrounding land uses.
- *The site is anticipated to comply with all applicable environmental regulations.* The site is not located within a Special Flood Hazard Area and contains no freshwater wetlands, wetlands transition area, or steep slopes. It is anticipated that development on the site will comply with NJDEP regulations.
- *The site will not affect any historic or architecturally important sites and districts.* The site is not located within a Historic District and does not contain any historic or cultural resources listed on the New Jersey or National Registers of Historic Places.

☑ Developable site: In accordance with N.J.A.C. 5:93-1.3, a developable site has access to appropriate sewer and water infrastructure and is consistent with the areawide water quality management plan. The site has access to sewer and water service, and is served by the Middletown Sewerage Authority and Atlantic Highlands Water Department, respectively.

☑ Approvable site: Pursuant to N.J.A.C. 5:93-1.3, an approvable site may be developed for very-low, low-, and moderate-income housing in a manner consistent with the rules or regulations of all agencies with jurisdiction over the site. The development is anticipated to be developed consistent with the rules and regulations of all agencies with jurisdiction over the site.

Harborside Conversion

The Harborside site, located at 40 First Avenue, is slated to be converted to a mixed-use development containing ground floor commercial uses with 22 residential units above. The residential component will include 4 or 5 affordable units for low- and moderate-income households. The subject site encompasses Block 97, Lot 19.

The site is available, approvable, developable, and suitable as defined in N.J.A.C. 5:93-1.3.

☑ Available site: The site is under private ownership and the developer has expressed interest in redeveloping the site.

☑ Suitable site: The site is suitable as defined in N.J.A.C. 5:93-1.3, which indicates that a suitable site is one which is adjacent to compatible uses, has access to appropriate streets and is consistent with environmental policies in N.J.A.C. 5:93-4.

- *The site is adjacent to compatible land uses and has access to appropriate streets.* The site is bounded by non-residential and mixed-use commercial/residential uses to the north, south and west, and single-family residential uses to the east; however, as the proposed project is

envisioned to be a three-story structure, the building and overall development is anticipated to be compatible with all surrounding land uses.

- *The site is anticipated to comply with all applicable environmental regulations.* The site is not located within a Special Flood Hazard Area and contains no freshwater wetlands, wetlands transition area, or steep slopes. It is anticipated that development on the site will comply with NJDEP regulations.
- *The site will not affect any historic or architecturally important sites and districts.* The site is located within the Borough's Historic Business District; however, the proposed project is anticipated to be designed to generally be in character with the existing historic structures along First Avenue, and is not anticipated to detract from the scenic streetscape within the Historic District.

☒ **Developable site:** In accordance with N.J.A.C. 5:93-1.3, a developable site has access to appropriate sewer and water infrastructure and is consistent with the areawide water quality management plan. The site has access to sewer and water service, and is served by the Middletown Sewerage Authority and Atlantic Highlands Water Department, respectively.

☒ **Approvable site:** Pursuant to N.J.A.C. 5:93-1.3, an approvable site may be developed for very-low, low-, and moderate-income housing in a manner consistent with the rules or regulations of all agencies with jurisdiction over the site. The development is anticipated to be developed consistent with the rules and regulations of all agencies with jurisdiction over the site.

65 First Avenue - T-Three, LLC

The T-Three, LLC site, located at 65 First Avenue, is slated to be developed with a mixed-use residential development containing ground floor retail with 15 residential units above. A total of three (3) units are required to be deed restricted for low- and moderate-income households. The project received Preliminary and Final Site Plan Approval with Variances on December 3, 2020 and encompasses Block 117, Lots 1, 2, 3, 4 and 5.

The site is available, approvable, developable, and suitable as defined in N.J.A.C. 5:93-1.3.

☒ **Available site:** The site is under private ownership and has received Preliminary and Final Site Plan Approval with Variances.

☒ **Suitable site:** The site is suitable as defined in N.J.A.C. 5:93-1.3, which indicates that a suitable site is one which is adjacent to compatible uses, has access to appropriate streets and is consistent with environmental policies in N.J.A.C. 5:93-4.

- *The site is adjacent to compatible land uses and has access to appropriate streets as demonstrated by the Preliminary and Final Site Plan Approval with Variances that the project has received.*
- *The site is anticipated to comply with all applicable environmental regulations and does not appear to contain environmental features that would preclude development, evidenced by the above referenced approval and ongoing construction of the subject project.*
- *The site will not affect any historic or architecturally important sites and districts.* The site is located within the Borough's Historic Business District; however, the proposed project is anticipated to be designed to generally be in character the existing historic structures along First Avenue, and is not anticipated to detract from the scenic streetscape within the Historic District.

☑ Developable site: The approved project has access to appropriate sewer and water infrastructure and is consistent with the areawide water quality management plan.

☑ Approvable site: Pursuant to N.J.A.C. 5:93-1.3, an approvable site may be developed for very-low, low-, and moderate-income housing in a manner consistent with the rules or regulations of all agencies with jurisdiction over the site. The project has already received Preliminary and Final Site Plan Approval with Variances and is anticipated to be developed consistent with the rules and regulations of all agencies with jurisdiction over the site.

Please note that 160 First Street submitted a development application to the Borough several years ago for 30 units, and subsequently reduced the number of units to 25 units; however, the application was ultimately denied. In May of 2025, the Borough spoke with entities involved in that application but has not received a subsequent development application for this property.

Cost Generation

The Borough of Atlantic Highlands will focus on complying with N.J.A.C. 5:93-10 regarding ensuring the elimination of unnecessary cost generating features from municipal land use ordinances. The municipality will eliminate development standards that are not essential to protecting the public welfare and will expedite (“fast track”) approvals/denials on inclusionary development applications. The Borough will cooperate with developers of inclusionary developments in scheduling preapplication meetings, and municipal boards shall schedule regular and special monthly meetings (as needed) and provide ample time at those meetings to consider the merits of the inclusionary development application.

Additional Documentation

The Borough has compiled all of the affordable housing documentation that was able to be obtained as of the time of adoption of this Plan and is committed to obtaining and providing any additional documentation that may be needed to fully comply with applicable regulations, and sending same to the Program to follow. Regarding operating manuals for rental and for sale units, affirmative marketing plan, affordable housing ordinance, and related documents, the Borough intends to continue to rely on the existing versions of these documents until the pending comprehensive updates to the UHAC regulations are approved, at which time the Borough intends to amend these documents to comply with the updated UHAC regulations.

B. Summary of Fair Share Plan

In summary, the Borough of Atlantic Highlands has fully addressed its cumulative Prior, Third, and Fourth Round fair share obligations. The Borough intends to continue to proactively implement its Fair Share Plan in accordance with all applicable regulations.