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BANCROFT REDEVELOPMENT PLAN REPORT

Adopted by the Haddonfield Planning Board on _____

Introduction:

The purpose of this report is to comment on the Bancroft Site Redevelopment Plan (hereinafter "Plan"), which was prepared by Heyer, Gruel & Associates and dated August 30, 2010.

The Borough Commissioners declared the Bancroft Site to be an area in need of redevelopment by resolution dated April 26, 2006.

The Local Redevelopment and Housing Law (LRHL) provides that a municipality may adopt a redevelopment plan for an area previously declared to be in need of redevelopment. The LRHL requires a redevelopment plan to state its "relationship to definite local objectives as to appropriate land uses, density of population, and improved traffic and public transportation, public utilities, recreational and community facilities and other public improvements." NJSA 40A:12A-7(a)(1)

Before adoption a plan must be submitted to the planning board, which may within 45 days prepare a report that includes "an identification of any provisions in the proposed redevelopment plan which are inconsistent with the master plan and recommendations concerning these inconsistencies and any other matters as the board deems appropriate." NJSA 40A:12A-7(e). Thereafter, the governing body must review the report, although it is not bound by the recommendations contained therein. Ibid.

The Plan was officially submitted to the Board just prior to its regularly scheduled meeting on September 7, 2010, at which time the Board heard comments from members of the public and viewed a slide show prepared by the Haddonfield Environmental Commission that outlined an alternative concept plan for the Bancroft property. The Board determined to appoint a subcommittee to write a draft report for consideration by the entire Board. It also scheduled a work session for September 23, which members of the public were invited to attend. The Board also solicited input from the Haddonfield Historic Preservation Commission, the Environmental Commission and the Zoning Board of Adjustment. The Board then held a public meeting on October 25, 2010 to hear from members of the public and the Borough professionals who developed the Plan and to discuss the draft report prepared by the subcommittee. This report was adopted by the Board on _____.

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This report contains three sections:

- Part One first compares the Plan with the core Master Plan and several relevant elements and notes consistencies and inconsistencies between the Plan and the Master Plan.
- Part Two of the report offers comments on “other matters,” as authorized by the LRHL.
- Part Three offers comments and recommendations concerning the Plan submitted to the Board.

PART ONE- MASTER PLAN CONSISTENCY

Under the Municipal Land Use Law (MLUL) a master plan is a report or statement that includes a statement of objectives and policies for the future development of a municipality. It consists of several elements, two of which are mandatory (the land use element and the housing element) and others (such as an open space and recreation element) are discretionary. It is notable that Haddonfield’s Master Plan goes well beyond the minimum requirements, indicating a deep public commitment to good planning.

In preparing this report the Board examined the documents it considered to be directly relevant to the proposed Plan:

- 1984 core master plan
- 1997 Historic Preservation Element,
- 2000 Residential Land Use Element,
- 2005 Parks, Recreation and Open Space Element,
- 2007 Downtown Area Element
- 2008 supplement to the Parks, Recreation and Open Space Element,
- 2008 Housing Element and Fair Share Plan.

The Board also reviewed:

- The Master Plan Reexamination Reports adopted by the Board in 1991, 2003 and 2009, and
- The 2005 Redevelopment Area Determination Report.

It should be noted that the proposed Plan makes no reference to the 1997 Historic Preservation Element or the 2005/2008 Parks, Recreation, and Open Space Element.

This section primarily focuses upon whether the uses proposed in the Plan are consistent with the aforementioned documents, in context of the four “districts” proposed by the Plan

Lullworth Hall Professional Office District

Lullworth Hall is a 19th century, 2 1/2 story Victorian style structure that as of 2005 was used by Bancroft for corporate offices. It is an historic building that in 1997 received a certificate of eligibility from the New Jersey Historic Preservation Office, making it eligible for funds from the New Jersey Historic Trust. The Plan recommends that the building be restored or renovated for adaptive reuse as an office. Alternatively, the Plan permits use as a bed and breakfast.

Preserving Haddonfield's historic area and historic buildings has been a goal of the master plan since 1972, and this goal was the basis for the 1997 Historic Preservation Element. Insuring the continued historic integrity of Lullworth Hall thus furthers the objectives of the Master Plan. The proposed use as an office building is consistent with the current use, and a bed and breakfast would not be inconsistent.

Open Space and Recreation District

The Plan calls for creating an open space and recreation district that would be utilized for either a regulation soccer field (300x180) or football field (380x160). The Plan does not specify whether the field would be natural grass or artificial turf. Accessory structures would also be permitted, such as bleachers, fencing and signs. Eighty parking spaces would be provided, which would be shared with the proposed affordable housing complex that would abut the field.

The 2005 Recreation and Open Space Element cited an increasing "need to provide recreational opportunities for an increasing number of younger aged residents." Youth sports associations within the Borough cited a need for additional active recreation facilities, particularly playing fields. The 2005 Element suggested that to meet increased needs the Borough "should explore the possibility of creating a multipurpose general field area with synthetic turf and lighting for evening use." The 2008 supplement concluded that part of the Bancroft site "would make excellent playing fields to add to the high school's existing stadium and one practice playing field." The 2008 supplement did not say whether the turf should be synthetic.

The Board concludes that the Plan's proposal to create an Athletic field at the Bancroft site is consistent with the master plan.

Affordable Housing District

The Plan calls for the construction of up to 19 affordable apartments adjacent to Lullworth Hall and the proposed athletic field. The carriage house near Lullworth Hall, which is also an historic structure, would be "restored appropriately and be adaptively reused for affordable units" The Plan does not specify how many affordable units could be created in the carriage house. The affordable housing development would be

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consistent with COAH regulations. The Plan does not say what regulations would govern in the event COAH is abolished, but presumably the development would be consistent with all State statutes and State agency regulations governing municipal compliance with the Mount Laurel doctrine, although this should be clarified in the Plan. The Plan also does not describe the type of affordable housing to be built, but at the September 23 planning board meeting the planners who prepared the Plan stated that the development would consist of family rental housing.

The Plan is not entirely consistent with the 2008 Housing Element and Fair Share Plan endorsed by the Planning Board and the Borough and submitted to and approved by COAH. The Housing Element calls for the construction 10 affordable units on the Bancroft site and for Bancroft to fund the construction of 10 affordable family rental units on the so-called CIS site, which is a 1.5 acre parcel behind Borough Hall. The 10 Bancroft-funded units on the CIS sites would be part of a development consisting of at least 28 family rental units in "medium intensity multi-family apartment flats." The Housing Element and Fair Share Plan did not specify the type of affordable units that would be built on the Bancroft site.

This inconsistency raises several questions. How did the number of affordable units on the Bancroft site go from 10 to a maximum of 19? Is Bancroft still expected to fund 10 of the 28 units on the CIS site, as well as building up to 19 units on its site? Is it the Borough's intention to increase the number of affordable units within the municipality? Would adoption of the Plan as currently written require the Borough to seek COAH approval of an amended housing element and fair share plan? The Board is in no position to make recommendations on the affordable housing component of the Plan until these questions are answered.

Finally, the Board is aware that the 2008 Housing Element and Fair Share Plan may be obsolete as a result of the October 8, 2010, Appellate Division opinion that invalidated key provisions of the existing COAH rules, including the growth share approach, and pending legislation that would abolish COAH and substitute other methodologies and mechanisms to enable a municipality to comply with its Mount Laurel obligation.

Continuing Care and Retirement Community District

By far the most extensive development proposed in the Plan is a continuing care retirement community (CCRC) of between 160 and 190 individual living units, a 75-unit assisted living facility and a community center or clubhouse with a minimum floor area of 20,000 square feet. This complex would be built on Block 14, Lot 2, which is the 12.6 acre parcel to the east of Hopkins Lane. The undisturbed wooded area adjacent to the County park which is not earmarked for development would be conveyed to the Borough or an entity designated by the Borough.

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The 1984 Master Plan cited a need for more senior citizen housing, reasoning that "Haddonfield's population is aging while its household size is on the decline." It further suggested that "the aging population points to a need for additional passive recreational facilities, rather than the active recreation areas developed after the "baby boom" years" and "the core area of the Borough is most appropriate for needed senior citizen housing units," as that would provide the easiest access to public transportation, shopping and community facilities.

The 1991 Reexamination Report urged the Borough to continue to explore the possibility of encouraging the development of senior citizen housing. The 2003 Reexamination Report noted the construction on Lincoln Commons and commented that the recommendation for additional senior citizen housing had been "adequately addressed," although it may be that the report was referring to satisfaction of the need for affordable senior housing.

The 2008 Open Space and Recreation Element identified the Bancroft Site as a parcel that should be acquired for open space and recreation. Noting the parcel's proximity to the existing county-owned parkland, and the number of mature trees and wildlife on site and in the immediate area, the 2008 element opined that acquiring both parcels for open space "would allow the further expansion of the parklands which also have been targeted by the Trust for Public Land for their River-to-Bay Greenway initiative." Noting that the site is "under enormous development pressure" the report concluded that acquisition "is the most significant opportunity to maintain a green buffer and provide recreational space for schools and community."

To put these conclusions in context, the cited need for open space dates back to the 1984 Master Plan, which recommended protection of existing open space areas and the expansion of protected open space in "new high density housing areas." The 1991 Reexamination Report recommended that the Borough should, "where possible, acquire additional open space for the benefit of the community." Similarly, the 2003 Reexamination Report urged the acquisition of open space.

The 2005 Parks Open Space and Recreation Element noted that 182 acres, or about 10% of the Borough's area, consists of preserved open space. On this basis the report concluded: "The Borough thus has a more than adequate amount of open space within its borders." The 2008 Open Space Element observed that notwithstanding the amount of existing preserved open space, "there are more groups interested in using this open space for active and passive recreation than there is space available." "Exacerbating the problem is that a significant portion of the open space in the borough is concentrated along the Cooper River adjacent the [sic] eastern boundary of the community and, therefore, not evenly distributed or easily accessible to all neighborhoods within Haddonfield."

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Nonetheless, the 2005 element recommended that “in order to serve the future needs of its residents, the Borough, which is an established and intensively developed community, should actively seek opportunities to expand its parks and open spaces.” The 2008 element noted the interest in increasing the proposed Greenway, part of which is adjacent to the Bancroft site, and that there was an “anticipated demand for new open space of at least 4 acres.” In the 2009 Reexamination Report the Board expressed its continued support for the Greenways Project and urged the Borough to continue to seek funding. In addition, the Bancroft site was specifically listed in the 2008 supplement to the Parks, Open Space, and Recreation element as a high priority for acquisition for open space. (This supplement comprised the successful application submitted by the Borough to the state Green Acres Program, which resulted in an award of a \$500,000 grant toward acquisition of any of the projects listed in the application.)

Finally, although not specifically related to the CCRC district, the 2000 Land Use element, which is quoted in the Plan as evidenced of its consistency with the entire Master Plan, includes the following sentence: “Any campus plan by Bancroft must address the school’s current and potential adverse impacts on nearby single-family and other residential uses as well as the Borough as a whole, and demonstrate how the school will ameliorate any such adverse impacts.” The Plan fails to address this stipulation, particularly in the context of the proposed CCRC facility.

Based on the above, the Board concludes that there is a conflict between the CCRC component of the Plan and the Master Plan. The Master Plan recommends at most limited development on the site, whereas the Plan would result in a very intensive development.

PART II-OTHER MATTERS

This section addresses related matters the Board deems to be relevant to its consideration of the proposed Plan.

The Ethos of Planning in Haddonfield:

Consistency of themes:

For more than 50 years, Haddonfield's Master Plans (1959, 1972, 1984) have articulated a remarkably consistent set of themes:

- a. The need to protect the residential character of the town
- b. The need to protect the physical character of the town
- c. The need to address and manage traffic issues.
- d. The need to increase public open space, for parks and recreation

Although these are in some instances contradictory, overall they convey a decades-old consensus on the Borough's approach to growth and development. In fact, in describing its overall approach, the 1984 plan states:

The [1984] Master Plan is structured into separate plan elements in accordance with the Municipal Land Use Law. However, the plan is treated as a continuation of the planning process as developed by the 1959 and 1972 plans. In addition, the [1984] ...plan recognizes that the general pattern of land use has been established and major deviations from that pattern would be inappropriate. (p 19, 1984 MP)

And:

The 1983 [approved 1984] plan recognizes that the community is a very special place by virtue of its existing urban form (a dynamic core containing a healthy balance of shopping, jobs and community services for the surrounding residences it serves); its historic identity; and its visual attractiveness. All plan proposals are intended to preserve and/or strengthen these features while reflecting the recommended plan goals.

The proposed Plan recommends a land use pattern that deviates from the existing urban form, and therefore is inconsistent with the 1984 Master Plan.

Density and Cooper River

It is instructive to note a reference in the 1984 Master Plan to Cherry Hill's Master Plan, in the "Area Plan Conformance" section:

Lands on the north side of Potter/Ellis in Cherry Hill [Croft Farm area] are zoned Institutional to reflect community ownership of lands along the Cooper River. This is consistent with [Haddonfield's 1984] ...proposed land use plan's Park/Rec/ and Open Space classification for the same area.

Lands in Cherry Hill to the south of Ellis Street [site of Tavistock condominiums] are zoned for medium density residential. This is not consistent with the Borough's park classification, but since the Cooper River forms a natural boundary, the existing Cherry Hill zoning should not have a negative impact on Haddonfield. (p 33. 1984 MP)

It is clear here that the Master Plan was concerned about the potential impact of new medium-density development on the Cooper River parkland in Haddonfield. It is also clear that the concern was mitigated by the fact that the likely development in Cherry Hill would be on the other side of the river, implying that the primary concern was with immediate proximity to the Park/Rec/Open Space area in the Borough. In considering the proposed Plan's consistency with the 1984 Master Plan, it is instructive to note that the proposed Plan calls for a similar density of development on the Bancroft site immediately adjacent to the Cooper River and Hopkins Pond park areas.

Approaches to Density, Massing, and Scale

The 1984 Master Plan's goals and objectives have been used by the Board for 26 years to address complex issues related to density, massing, and scale of buildings in its residential and downtown neighborhoods. In addition, years of public input on Master Plan revisions, zoning ordinances, and specific development projects by hundreds of residents have demonstrated deep-seated community interest in maintaining Haddonfield's physical character, as described in the 2000 Residential Land Use element:

The visual attractiveness of Haddonfield is due in part to its physical sense of order. This sense of order is a product of use compatibility and scale; these factors should be a primary consideration in Master Plan development and implementation. (p 6/2000 Residential Land Use Element)

With this in mind, the way the Board approached two specific land use issues over the last decade are relevant to the consideration of the proposed Plan for the Bancroft site.

- *Residential scale and massing:* This issue manifested itself in residential neighborhoods in the 1980s as remaining over-sized lots were subdivided

and developed. By the 1990s, residential neighborhoods also were being changed by tear-downs of existing (typically small) houses which were replaced with large structures built to the maximum permitted under the land development ordinance's bulk standards. After careful consideration, the borough amended its land development ordinance specifically to better address issues of scale and massing to attempt to halt development that was significantly changing neighborhoods (undermining the goals of the Master Plan).

- *Downtown density, scale and massing:* This issue manifested itself in the early 2000s when infill development was proposed in the central business district and neighborhoods immediately adjacent to the CBD. In response, the Borough engaged in a two-year process that entailed extensive community outreach and discussion about downtown, and a careful development of a new downtown Master Plan element to guide evolution of this important part of town. As with the residential zoning, more zoning districts were established to create a more fine-grained set of bulk standards. In addition, the Master Plan recommended a form-based zoning code, articulated a clear vision for the downtown to guide Planning Board and HPC review of applications, and recommended specific design standards to achieve that vision and insure that new development is consistent in scale and massing with the existing fabric. In addition, the downtown MP element gave careful consideration to location of density (confining the most dense development to a narrow corridor in close proximity to PATCO), and the impact of new development on adjacent neighborhoods. In short, the Borough employed innovative approaches and best practices to develop a Master Plan element (and implementing zoning) that specifically and sensitively addressed density, scale and massing issues.

There is a clear thread of intent that runs from the 1959 Borough Master Plan through the 1984 Master Plan and subsequent Master Plan elements: Density, scale and massing and impact on neighborhoods of new development consistently appear as core themes, and have been issues of long-standing concern to Borough residents and the boards and commissions appointed by the town's governing body, including Planning Board. The proposed Plan for the Bancroft site insufficiently addresses these issues, and as such is not consistent with the long-standing tradition of vigorously articulating density, scale and massing standards that conform to and complement the Borough's physical design.

Approaches to Senior Citizen Housing:

The Master Plan recommends consideration of alternative Residential Uses for seniors in the Borough. A Continuing Care Retirement Community (CCRC) is an option to satisfy that criteria but it is not the only option. In the absence of supporting studies / data (i.e. Traffic, Financial Impact Analysis, etc.) of other potential uses (such as an over 55 community with a community center), it is difficult to conclude whether or not a CCRC provides the best functional response for the Borough to satisfy the criteria. Therefore, it is recommended that alternative development models be explored to satisfy the need for senior housing that may have less of an impact on the Borough infrastructure and the existing uses bordering the site.

Historic Preservation:

The Bancroft site has historical significance that goes beyond the significance described in the proposed Plan, as summarized by the “Special Report to the Planning Board Regarding the Bancroft Site dated 23 September 2010” prepared by the Historic Preservation Commission. It should be noted that the HPC, the Borough’s primary body for governing historic preservation, was not consulted in the development of the proposed Plan. Therefore, it is recommended that the HPC be included in discussion of the site, and that content of its 9/10 report be carefully considered and the scope of the structures identified in the report be retained as part of the development as adaptive reuse.

In addition, although the purpose of this report is not to suggest specific amendments to the proposed Plan, we do recommend that in any Plan approved by the Commissioners the carriage house should remain closely associated with Lullworth Hall (ie, should remain on the same lot in the event of subdivision), with the two buildings designated for complementary uses. This approach would be sympathetic to the historic nature of the original property.

Parks, Recreation and Open Space

In spite of numerous references in the Master Plan to the importance of acquiring some or all of the site for parkland (as distinct from athletic fields), parkland is treated by the proposed Plan as a residual use, with no articulation of its role as a neighborhood and community amenity. Regardless of size, land preserved on the site for park and open space use should be addressed as a discrete use on the site that will foster an identity and presence that will serve the entire community, and serve as an amenity for whatever redevelopment occurs. In addition, pedestrian circulation on the site—however the site is developed—should serve as a unifying element for the diverse functions on the site. Interconnecting pathways can potentially take advantage of the historical structures on the site and be utilized by the new development to provide

connection from Kings Highway with points along Hopkins Lane to Hopkins Pond and the Camden County Park System for the community.

Bulk Standards

The bulk standards in the proposed Plan are generic in nature and do not meet the high bar set by the Master Plan for density, massing, and scale.

PART III-RECOMMENDATIONS

Under the LHRL the Board's responsibility is to make recommendations with respect to the Plan's consistency with the Master Plan.

The Board finds that a mixed-use redevelopment plan for the Bancroft site could be consistent with the Master Plan. Nevertheless, it also finds that the proposed Plan is not consistent with the Master Plan, for the reasons discussed above.

The Board recommends that the Borough Commissioners reject the proposed Plan in its current form and develop a revised plan that addresses the range of issues identified above, including 1) the type of senior citizen housing provided; 2) traffic and related impacts on nearby neighborhoods; 3) the need for a deliberate balance of open space and development for the site that treats these as complementary and mutually beneficial uses for the site and the community; 4) carefully articulated design standards and bulk requirements that reflect the community's physical design and long-standing concerns about density, scale, and massing of building; 5) preservation of the historic outbuildings; and 6) the site's relationship to Cooper River Park and Hopkins Pond.

The Board understands that the Bancroft parcel is the last large parcel in town capable of being redeveloped (whether for open space, senior housing or a mix) and therefore it is critical that the Borough get it right. Any redevelopment plan for the Bancroft site should draw on the standards articulated in all relevant elements of the Master Plan, and the Commissioners, the Planning Board, and the community should use those standards to judge its worthiness.