

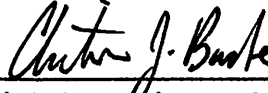
**FRANKLIN TOWNSHIP  
RESOLUTION #2025-27**

**RESOLUTION APPROVING THE CROSS-ACCEPTANCE RESPONSE  
TEMPLATE WITH TOWNSHIP (PLANNER'S) COMMENTS IN RESPONSE TO  
THE PRELIMINARY STATE DEVELOPMENT AND RE-DEVELOPMENT  
PLAN**

**WHEREAS**, Hunterdon County has requested that each of its participating municipalities complete and submit the Cross-Acceptance Response Template in response to the Preliminary State Development and Re-Development Plan.

**NOW, THEREFORE, BE IT RESOLVED**, by the Township Committee of the Township of Franklin that the Township's Cross-Acceptance Response Template be approved and submitted to Hunterdon County with the Township Planner's Comments.

I, Christine J. Burke, Municipal Clerk of the Township of Franklin, County of Hunterdon, do hereby certify this to be a true copy of a resolution adopted by the Township Committee at a meeting held on March 27, 2025.



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Christine Burke, RMC  
Municipal Clerk

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## Cross-Acceptance Response Template

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### Section 1: Consistency with The Preliminary State Plan

If a municipality or regional entity obtained Plan Endorsement that has not expired, this section does not need to be completed.

1. Indicate which documents the municipality or county has and the dates of adoption:

Most recent adopted Master Plan and any draft elements currently being considered

Master Plan Reexamination Report(s): [Master Plan Adopted 12/4/1994,](#)

[Reexamination Report 10/23/2019](#)

<https://franklin-twp.org/documents/2019-master-plan-reexamination/>

[Reexamination Amendment 11/3/2021](#)

<https://franklin-twp.org/documents/2019-master-plan-reexamination-2021-amendment/>

Official Map pursuant to N.J.S.A. 55D-32

Land use map

Zoning Ordinance and other land development standards: [Created 3/2/1979 Refer to our Township Code for ordinances](#)

<https://ecode360.com/37600557>

Zoning map and schedule: [Zoning map adopted 11/2020, Schedule adopted 11/2020](#)

<https://ecode360.com/attachment/FR1024/FR1024-220b%20Zoning%20Map.pdf>

<https://ecode360.com/attachment/FR1024/FR1024220a%20Schedule%20of%20Zone%20Req%20Table.pdf>

Natural Resource Inventory: [Adopted 8/2009](#)

<https://franklin-twp.org/documents/natural-resource-inventory/>

Recreation and Open Space Inventory (ROSI): [Created 2013, updated 2018](#)

Redevelopment and/or rehabilitation plan(s) adopted pursuant to the Local Redevelopment and Housing Law (LRHL)

Resource protection ordinances

Farmland Preservation/Agricultural Retention Plan

Any other adopted planning documents (e.g. Stormwater Management Plan, Wastewater Management Plan, Capital Improvement Plan)

[Stormwater Management Plan adopted 4/2019](#)

2. Review the ten goals in The Preliminary State Plan and indicate the degree to which municipal and county plans have incorporated key concepts and policy objectives.

[This is a Draft State Plan that was published in December. The Township has not amended any of its Master Plan documents since December of 2024. The goals are broad and do not reflect the diverse characteristics of the State.](#)

3. If inconsistent how will the municipality or county become more aligned with the State goals and how will this be achieved? What is the predicted timeframe for greater consistency?

The Township does not agree with all of the goals as written. Franklin does not intend to amend any of its Master Plan documents to address the Draft State Plan at this time.

4. How well do the designated State Planning Areas suit the current and future development of your municipality and/or county?

Based on the interactive locator map, Franklin is within three Planning Areas. Metropolitan Planning Area (PA1) covers the northern most point of the Township, which includes the ShopRite and WalMart shopping centers, Hamton Inn and church. The identified area does not fit the criteria noted for PA1 and should be modified to PA3, which reflects the characteristics of this portion of Franklin.

A majority of the Township is designated Rural/Environmentally Sensitive Planning Area (PA4B), which the Township concurs with.

The Locator Map also identifies areas around Capoolong Creek between Lower Landsdown Road in the northeast and Quakertown Road in the southwest as "Open Space". The Township supports this Planning Area designation.

## Section 2: Agreements and Disagreements with The Preliminary State Plan

1. Provide a detailed discussion of any issues or recommendations to The Preliminary State Plan in order to better meet local needs.

Please see the attached Comments "Review of Preliminary Draft of the New Jersey State Development and Redevelopment Plan" as provided by Darlene Green, Franklin Township Planner, on March 3, 2025.

As Franklin Township is home to numerous acreage of farmland and is greatly interested in the preservation of these farms and in maintaining the rural character of the municipality, there is great concern over the difficulties the Township faces in offsetting the reduced taxes of preserved farms, the State's demands for increased development, particularly of affordable housing, and the lack of options in balancing these endeavors. Franklin Township would appreciate the State's assistance in providing incentives that would offset the burden of reduced taxes and tax-exempt properties place on residential and commercial property taxes.

2. Provide a detailed explanation of how municipal and county plans will be modified in order to create a greater degree of consistency.

Franklin does not intend to modify its plans.

3. Provide comments and recommendations regarding State agency implementation of the State Plan including any applicable agency or program, as well as, make recommendations as tom possible revisions to those plans or programs that would enhance State Plan implementation at all levels of government.

The Draft Plan does not identify what agency will implement any priority. Therefore, we are unable to comment on agency implementation.

4. Submit a Negotiating Agenda, which will form the basis of the negotiation sessions between the negotiating entity and the SPC. The agenda should state the issues being presented, proposed alternatives and provide direct citations of pertinent State Plan provisions wherever possible. OPA will then schedule meetings with the negotiating entity to work through the agreements and disagreements.



5. Identify areas to be protected and areas where sprawl (low density auto-dependent development) has occurred and should be limited or prevented from further sprawl. Identify vulnerable areas where there is flooding or other environmental concerns and what could be done to protect them.

As there is no mass transit in Franklin, residents must rely on cars as a means of transportation. Development inconsistent with the Township's Master Plan and Zoning Regulations should be precluded.

6. Does the municipality and/or county have an open space plan? <https://franklin-twp.org/documents/open-space-and-recreation-plan/>
7. Open space tax? **Yes**
8. Is the municipality a member of Sustainable Jersey? **Yes** If not, what are the reasons for not participating? Does the municipality have other environmental groups, such as, an Environmental Commission or a Green Team? **Yes**
9. Please indicate your community's three most important local and regional land use planning goals and priorities:

To maintain the rural character of the Township, which is overwhelmingly served by wells and septic.

To encourage economic development that is in keeping with the scale and character of the Township along the County Roads, which respects the natural carrying capacity of the land due to the reliance on wells and septic systems.

To encourage and support the agricultural industry.

10. Additional comments:

Please see the attached Comments "Review of Preliminary Draft of the New Jersey State Development and Redevelopment Plan" as provided by Darlene Green, Franklin Township Planner, on March 3, 2025.

## Memorandum

To: Christine Burke, Clerk, Township of Franklin

From: Darlene A. Green, PP, AICP

Date: March 3, 2025

Subject: Review of Preliminary Draft of the New Jersey State Development and Redevelopment Plan

Project No.: FKT-001A

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The New Jersey State Planning Act was signed into law in 1986. The Act states that New Jersey needs integrated statewide planning to “conserve its natural resources, revitalize its urban centers, protect the quality of its environment, and provide needed housing and adequate public services at a reasonable cost while promoting beneficial economic growth, development and renewal”.<sup>1</sup> The Act requires the preparation of a State Development and Redevelopment Plan (“State Plan”). The purpose of the State Plan is to “coordinate planning activities and establish Statewide planning objectives in the following areas: land use, housing, economic development, transportation, natural resource conservation, agriculture and farmland retention, recreation, urban and suburban redevelopment, historic preservation, public facilities and services, and intergovernmental coordination”.<sup>2</sup> The last State Plan was adopted on March 1, 2001.

On December 4, 2024, the State Planning Commission approved a new State Plan entitled “The Preliminary Draft of the New Jersey State Development and Redevelopment Plan” (“Draft State Plan”). The Draft State Plan was released to the public on December 6, 2024. This office has reviewed the Draft State Plan as it relates to the Township of Franklin and offers the following comments and concerns in italics, which are grouped according to chapter.

### Executive Summary

- Page 13. Historic and Scenic Resources is another one of the State Plan’s goals and its summary states, “The State should also facilitate public access to high-quality open space, scenic landscapes, historical resources, and recreation resources.

*The Township supports this statement and encourages public access to open spaces within the Township.*

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<sup>1</sup> [Office of Planning Advocacy](#), accessed February 12, 2025.

<sup>2</sup> [State Plan Overview](#), accessed February 12, 2025.

## Chapter B. 2050 Statewide Planning Goals, Strategies, and Priorities Goals

### Economic Development

- Page 21. Sustainable and Inclusive Development – Priorities states, “Encourage economic development and employment opportunities that enhance the viability of agriculture, retain, and expand key services and industries that underpin our agricultural sector, such as regional food hubs, food processing facilities, agricultural equipment suppliers, and urban agriculture, as an industry.”

*The Township supports this priority. However, clarification should be provided on how the State would encourage expansion of “regional food hubs, food processing facilities, agricultural equipment suppliers.” Would grants or other funding be available for municipalities to promote this kind of economic development?*

### Housing

- Page 23. The Strategy states, “Enable housing growth in transit-rich, mixed-income communities, supporting multi-generational households, and providing a balanced mix of rentals, starter homes, senior housing, and market-rate units to meet future population growth and address affordability needs. Encourage municipalities to adopt inclusionary zoning, streamline development through public-private partnerships, and integrate green building standards and transit-oriented infrastructure to improve sustainability.”

*This strategy seeks to build housing blind to environmental limitations and utility constraints. Housing development must work within the confines of environmental limitations and utility constraints. This strategy should be revised to encourage housing development outside of environmentally sensitive lands and limit housing development to existing utility constraints.*

- Page 23. The Goals section states, “Ideally, new housing will be created in transit-rich locations and in communities that are ethnically and economically diverse and integrated. Facilitating multi-generational households through the creation of accessory dwellings and multi-unit dwellings is critical to promoting well-being and supporting New Jersey’s diverse population.”

*The Township of Franklin does not have access to public transportation options. The Draft State Plan does not provide a separate housing goal oriented toward communities lacking public transportation. Clarification should be provided on the goal for housing development in areas lacking public transportation.*

*Additionally, this is the first mention of the term “accessory dwellings” in the Draft State Plan. It is mentioned throughout the Housing section. However, the Glossary (page 85) does not include a definition. Clarification should be provided on what the State views as an “accessory dwelling”.*

- Pages 23 and 24. The Goals section states, “Zoning used to exclude potential residents from communities with plentiful jobs and high-performing schools is inconsistent with the Plan.”



*No examples are provided on what type of zoning would be considered inconsistent with the Draft State Plan. Is it single-family zoning, multi-family, or the location of certain zones? Also, would the existing zones that have historically been in place for decades be considered inconsistent? Or would this apply to new zones only? Clarification should be provided.*

- Page 26. Housing as a Catalyst for Economic Development – Priorities states, “In areas where water, wastewater, and transportation infrastructure is available, allow for increased residential development densities as a consideration for providing required affordable housing set-asides.”

*This text should be revised to recognize water and wastewater limitations. Suggested text “In areas where water and wastewater infrastructure is available and capacity remains....” The Draft State Plan also does not provide guidance on how to accommodate new development with limited water and/or sewer capacity or in areas without utility infrastructure. Clarification should be provided. Finally, the Draft State Plan does not define what would be considered “increased residential development densities”. As written, that could be interpreted to mean one more unit per acre.*

- Page 26. Housing as a Catalyst for Economic Development – Priorities states, “Nothing in this Plan is to be interpreted as a reason for a municipality not to meet its housing requirements as promulgated in New Jersey statutes. Where a municipality has limited land suitable for development, redevelopment options, up-zoning, or other similar solutions must be implemented to meet constitutional requirements.”

*“Up-zoning” is not defined in the glossary. A definition should be added so municipalities have an understanding when reviewing mechanisms to address affordable housing. Additionally, the last sentence in this statement is incorrect, specifically the word “must”. Towns with limited vacant and developable land are permitted to seek an adjustment of their obligation, which would reduce their affordable housing obligation. The above-quoted text should be rewritten to address the misstatement.*

- Page 27. Housing Stock Diversity – Priorities states, “Ownership opportunities for young workers and families must also be a priority. More starter homes, condos, townhomes, and ADUs are needed to make homeownership attainable for low- and moderate-income households.”

*Clarification is needed as to what would be considered a “starter home”. Also, “ADUs” appears to stand for “accessory dwelling units”, which is not defined.*

- Page 27. Reducing Barriers to Development – Priorities states, “Minimize restrictive zoning. Many restrictive zoning practices are rooted in, and serve to reinforce, socioeconomic segregation. Zoning codes which ban multifamily development or ban ADUs will also restrict housing affordability and disincentivize private development.”

*Restrictive zoning is not defined. Clarification should be provided so municipalities understand if their zoning would be considered “restrictive”.*

## Infrastructure

- Pages 33 and 34. Clean Energy – Priorities states, “Promote and encourage development and redevelopment in higher intensity mixed-use, Urban Planning Areas, Suburban Planning Areas, growth areas, endorsed plans, Centers, and re-centered urbanized areas that accommodate the use of alternative modes of transportation and shared parking and other site improvements and infrastructure.”

*Clarification is needed on what “higher intensity mixed-use” includes.*

- Page 36. Revitalizing Older Centers – A priority is to “Identify new centers”, which states, “This can be done by redeveloping underutilized areas, particularly areas with connectivity to multimodal transit options or other underutilized amenities that can drive economic activity. These redeveloped areas should support new housing, businesses, and public amenities, including parks and open spaces.”

*It is unclear who is supposed to identify new centers – the State, County, municipality? The document should be revised to indicate what entity will be responsible for this task.*

## Natural and Water Resources

- Page 43. The Goals section states, “All levels of government, including regional planning agencies, should take actions to avoid, minimize, and mitigate site disturbance, tree removal, habitat fragmentation, impervious coverage, greenhouse gas emissions, invasive species, and the use of toxic building materials and ingredients; and prioritize natural and nature-based strategies and solutions. Continued development and preservation of local and regional systems of parks and preserved lands linked by trails, greenways, and public rights-of-way is necessary to protect the habitat and recovery of rare, threatened and endangered species, and protect native wildlife species.”

*The Draft State Plan demands more housing development as one of its goals. However, it is unclear how a community can avoid site disturbance, tree removal and impervious coverage when building housing unless all housing construction is to take place on previously developed land. The Township supports the above goal as written, but believes the State should reconsider and revise the goals and priorities listed for housing.*

- Page 43. The Goals section prioritizes farmland preservation as a strategic investment and states, “The State and local communities should protect the long-term viability of the agricultural industry, preserve land to mitigate climate change impacts through carbon sequestration and improved land management practices, and foster local food production to address food insecurity and promote healthy communities. Preserving farmland also contributes to the conservation of biodiversity, protects natural water resources, and helps maintain scenic landscapes, thereby enhancing the overall quality of life for residents and promoting tourism opportunities.”



*The Township supports this goal. However, preserving farmland can reduce property taxes, which can financially impact municipalities and their school districts. While the Township supports farmland preservation, too much preservation could cause financial issues. Clarification should be provided on how financial impacts of additional preserved farmland can be mitigated or other incentives created by the State to aid municipalities in the preservation of farmland.*

- Page 44. Habitat Preservation and Restoration – Priorities states, “Municipal master plans and zoning ordinances should make it explicit that habitat restoration is expected to occur as part of any (re)development project, to the extent that it is feasible.”

*As NJDEP regulates the habitats of threatened and endangered species, habitat restoration should be the purview of NJDEP and its experts, not a municipal zoning ordinance.*

- Page 45. Agricultural and Food Production – Priorities discuss farmland preservation and indicate preservation can achieve many objectives including:
  - Maintaining the long-term viability of the agricultural industry,
  - Utilizing preserved land to mitigate climate change impacts through carbon sequestration and improved land management practices, and
  - Fostering local food production to address food insecurity and promote healthy communities. Additionally, preserving farmland contributes to the conservation of biodiversity, protects natural water resources, and helps maintain scenic landscapes, thereby enhancing the overall quality of life for residents and promoting tourism opportunities.

*The Township supports this priority and its objectives. However, clarification should be provided on what the statement “improved land management practices” means and who is responsible - the State, County, Municipality, or property owner?*

- Page 47. Water Quality – Priorities states, “Identify and delineate sensitive surface water and groundwater resources, including aquifer recharge areas, headwaters, reservoirs, and Category 1 systems and take steps to protect them from impacts of development. Establish maintain, and restore appropriately vegetated buffers along streams, rivers, wetlands, reservoirs, and scenic waterways to protect the natural functions and quality of surface water resources.”

*The Township supports this priority, but it is unclear what entity is charged with these actions.*

## Historic and Scenic Resources

- Page 53. Open Space and Recreational Resources – Priorities include the following:
  - Promote adequate and appropriately located indoor and outdoor recreational facilities for the year-round enjoyment and health of all residents.

- Connect large contiguous tracts of forest, grasslands, and other natural lands with stream and river corridors through greenways to provide maximum connectivity and enhance their functional integrity and biological diversity.
- Protect the scenic qualities of forested areas that are visible from public roads, trails, and waterways from visually intrusive land uses, and preserve them through invasive species control, setbacks and other scenic corridor maintenance measures.

*The Township supports these priorities and encourages the State to provide funding to aid in parkland acquisition and development as well as facility upgrades.*

## Chapter C. State Plan Policy Map

- Page 68. This Chapter discusses the State Plan Policy map associated with the State Plan, including the difference between Planning Areas, Centers, and Environs, the Planning Areas (1 – 5).
- Page 70. Agriculture and Farmland Preservation. This Policy Objective discusses the importance of guiding development to meet the needs of the agricultural industry, promote urban farming, and to minimize conflicts between farmland retention and development. Additionally, this Policy Objective states, “Promote agritourism that includes wineries, breweries, distilleries, cideries, and facilities that provide auxiliary activities.

*The Township supports this Policy Objective. However, it is unclear who is tasked with achieving these objectives – the State, County, municipality, or a combination of entities? Clarification should be provided.*

- *The document mentions a “State Plan Policy Map” 17 times, but no where in the document does it inform readers where to find said “State Plan Policy Map”. In fact, page 120 specifically states that the “Smart Growth Explorer is not part of the official State Plan Policy Map”. Therefore, it is unclear where one would find the State Plan Policy Map.*
- *The Draft State Plan does not include an actual map within the document. However, the Office of Planning Advocacy website includes a link to an Interactive Locator Map, which displays the Planning Areas. The map can be accessed here:*  
<https://dosopa.maps.arcgis.com/apps/webappviewer/index.html?id=fbb0c0a8c7ce4a31b05d123426c4a79a>*. Since there is no physical copy of the map, it is unclear if the State can update the map boundaries and/or designations at any time. Currently, the metadata of the Planning Areas layer indicates the last edit date was 11/24/2024. The Draft State Plan should be supplemented with a copy of the State Plan Policy Map.*
- *Based on the Interactive Locator Map, Franklin is within three Planning Areas. The list below provides the areas, their location, and comments for each Planning Area:*
  - Metropolitan Planning Area (PA1)



- *The northern-most point of the Township is within the PA1, including the ShopRite and WalMart shopping centers, Hampton Inn, and church.*
- *Page 72. One of the intents of PA1 is to "Provide for much of the state's future growth in compact development and redevelopment." However, the Guiding Criteria of the PA1 includes a density of more than 1,000 people per square mile, existing public water and sewer systems and access to public transit systems, more than 1 square mile of land area, and a population of at least 25,000 people. The area identified in PA1 does not include any residential development, only a portion has access to a public water system, and there is no public transportation available. The area in Franklin does not fit the criteria noted for PA1 and the designation should be modified to PA3, which reflects the characteristics of this portion of the Township.*
- Rural/Environmentally Sensitive Planning Area (PA4B)
  - *A majority of the Township is within the PA4B. This includes areas generally south of West Sidney Road, Hogback Road, and the Sidney Road/Pittstown Road intersection.*
  - *Page 74. The intent of PA4B (as well as PA4) is to "Maintain the Environs as large contiguous areas of farmland, open space, and forested areas." The Township supports this Planning Area designation.*
- Environmentally Sensitive Planning Area (PA5)
  - *The northern quadrant of the Township is within this Planning Area. The area is generally bordered by Sidney Road, Upper Kingtown Road, Sidney School Road, Hogback Road, and the eastern municipal boundary.*
  - *Page 75. The intents of PA5 includes "Protect environmental resources; protect large and small contiguous areas of land; promote restoring habitats and bio-diversity; accommodate growth only in Centers, confining programmed sewers and public water services to Centers; revitalized cities, towns, and older traditional settlements; and protect, enhance, and diversify the existing character of stable communities." The Township supports this Planning Area designation.*
- Open Space
  - *The Locator Map also identifies areas around Capoolong Creek between Lower Landsdown Road in the northeast and Quakertown Road in the southwest as "Open Space". The Township supports this Planning Area designation.*
- *A majority of the Township is within either PA4B or PA5, which aim to protect farmland, environmental resources, and the character of the existing community. These designations do not appear to support the Housing goals and priorities. In fact, they appear to conflict with the Housing goals and priorities. The Draft State Plan should be amended to provide Housing goals and priorities that fit within the PA4B and PA5 designations.*



## Chapter D. Implementation

- Page 83. "Municipal planning in New Jersey is outdated. Many local governments lack resources to handle planning related procedures. Regional considerations should adhere to the goals outlined in the State Plan, which should be considered as the framework for decision-making. Regional considerations (regional master planning) help address inequitable municipal planning capabilities."

*Franklin takes exception with the above statement. The above statement should be deleted from the Draft State Plan or substantially revised. Is the Draft State Plan suggesting municipalities that lack resources be eliminated and governed/regulated at a regional level, rather than a local level? How would a municipality be determined to "lack resources" and who would determine this?*

## General Comments

- *It is unclear throughout the report what goal/priority is implemented by the State, County, municipality, or the private sector. The text should be clarified, or a matrix provided in the appendix.*
- *The Planning Goals, Strategies, and Priorities Goals should be numbered to enable practitioners and citizens to easily refer to statements within the report as opposed to referring to a page number.*

## Map Changes

- *The area of the Township categorized as PA1 is inappropriate. The northern corner of the Township does not have a density of 1,000 people per square mile, there is not public transit system and limited water and sewer capacity exist. The Township requests this area be changed to Fringe Planning Area (PA3), which better reflects the existing characteristics.*