

CA - ~~1413~~ Helmetts

5/22/75

Request for Admissions made by plaintiffs w/ answers

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Helmatta

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Attorneys for Plaintiffs

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION: MIDDLESEX COUNTY
DOCKET NO. C - 4122-73

URBAN LEAGUE OF GREATER NEW
BRUNSWICK, et al.

Plaintiffs

vs.

THE MAYOR AND COUNCIL OF THE
BOROUGH OF CARTERET, et al.,

Defendants.

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:
:

Civil Action

REQUEST FOR ADMISSION

TO:

Richard F. Plechner, Esq.
351 Main Street
Metuchen, New Jersey 08840

Plaintiffs hereby make Request for Admissions
pursuant to R. 4:22, et seq:

1. Does defendant admit that the zoning ordinance of the Borough of Helmetta in defining dwellings specifically excludes trailers?

Yes

2. Does defendant admit that the borough zoning ordinance does not provide for mobile homes as conforming uses? ✓

Yes

3. Does defendant admit that the borough zoning ordinance in defining dwellings specifically excludes apartment houses? ✓

Yes

4. Does defendant admit that the borough zoning ordinance does not provide for apartment houses as conforming uses?

Yes

5. Does defendant admit that in its residential zones single family dwellings are required to be on lots with a minimum width of 150 ft.?

Yes

6. Does defendant admit that in its residential zones single family dwellings are subject to a minimum ground floor area requirement of 1,000 sq. ft.?

Yes

7. Does defendant admit that it does not have a public housing authority?

Yes

8. Does defendant admit that in 1970 its minority population was zero black, 25 Spanish-speaking and zero other minority?

No

9. Does defendant admit that its black population decreased from four to zero during the period 1960-1970?

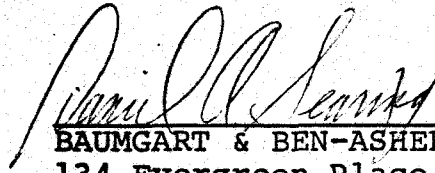
No

10. Does defendant admit that it has land available that could be used for residential development?

Yes

11. Does defendant admit that there are no peculiar circumstances which require maintenance of the provisions of the zoning ordinance listed in 1 through 6 above? If this is denied, list such additional peculiar circumstances and provide a summary of the facts supporting such circumstances.

No, The peculiar circumstances are the fact of Helmetta's small size (512 acres); that a good portion of this is low swampy land with high water table; that a large portion of the borough represents an important aquifer for the Old Bridge sands; that the County of Middlesex is condemning, for park purposes, the majority of vacant land in the borough to wit: approximately 200 acres; there are no sewers or city water supply in Helmetta.3 -



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CERTIFICATION

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

DATED: May 22, 1975

