

6/12/75

CA - North Brunswick

Request for admission by P's of  
N. Brunswick

pi. 1206  
pg 6

QA001688G



1. Does defendant North Brunswick admit that its municipal zoning ordinance specifically prohibits mobile homes?

Yes.

2. Does defendant admit its municipal zoning ordinance prohibits multi-family units over two bedrooms?

Yes, except that Town Houses may have three (3) bedrooms.

3. Does defendant admit that its municipal zoning ordinance limits two bedroom multi-family units to a maximum of 20 percent of total units?

Yes.

4. Does defendant admit that its municipal zoning ordinance requires that two bedroom multi-family units have 1,000 sq. ft. of floor area?

Yes.

5. Does defendant admit that its municipal zoning ordinance requires central air conditioning in multi-family developments?

Air conditioning is required but it need not be a central unit.

6. Does defendant admit that its R-1 zone requires minimum lot areas of 20,000 to 30,000 sq. ft., minimum lot widths of 120 to 150 ft., and minimum gross habitable floor areas of 1,850 sq. ft.?

Yes, except that floor area is 1600 square feet.

7. Does defendant admit that its R-2 zone requires minimum lot areas of 15,000 sq. ft., minimum lot widths of 100 ft., and minimum gross habitable floor areas of 1,700 sq. ft.?

Yes, except that floor area is 1400 square feet.

8. Does defendant admit that its R-3 zone requires minimum lot widths of 100 ft. and minimum gross habitable floor areas of 1,600 sq. ft.?

Yes, except that floor area is 1200 square feet.

9. Does defendant admit that its R-4 zone requires minimum gross habitable floor areas of 1,400 sq. ft. for single family units and 1,000 sq. ft. per unit for two-family dwellings?

Yes, except that floor area is 1000 square feet for both one and two-family dwellings.

10. Does defendant admit that as of 1970, 2,016 of its 3,053 vacant acres were zoned for industrial use?

Don't have this specific information.

11. Does defendant admit that the Middlesex County Master Plan projects that total acreage needed by North Brunswick to accommodate existing and projected industrial uses by the year 2000 is 865?

No. The Middlesex County Master Plan indicates that 864.8 acres will be necessary to accommodate projected manufacturing employment. This acreage figure is not related to existing or projected industrial uses but to employment.

12. Does defendant admit that as of 1972, there were 2,717 vacant acres in the municipality?

Yes. According to the Township Master Plan.

13. Does defendant admit that these 2,717 vacant acres represent 37.6 percent of the total municipal land area?

Yes. According to the Township Master Plan.

14. Does defendant admit that it has no public housing authority?

No. A Housing Authority was established in 1972.

15. Does defendant admit that the number of building permits it issued between 1965 and 1973 was as follows: No, see figures below. \*

	<u>1965</u>	<u>1966</u>	<u>1967</u>	<u>1968</u>	<u>1969</u>	<u>1970</u>	<u>1971</u>	<u>1972</u>	<u>1973</u>
Single Family	870	201	329	83	67	35	159	1,120	369
Multi-family	574	58	152	4	0	0	78	1,000	264
* Single Family	310	149	167	90	58	50	81	121	102
Multi-Family	558	56	152	-	-	-	60	1,029	246

16. Does defendant admit that its 1970 minority population was 218 black, 46 Spanish-speaking and 99 other minority?.

No. Correct figures are as follows:

281	Black	not 218	64	other specific
13	Indian		22	other non specified

No figures on spanish speaking population.

Source: 1970 Census - Middlesex County Planning Board.

17. Does defendant admit that its population increased from 10,099 to 16,691 during 1960-1970?

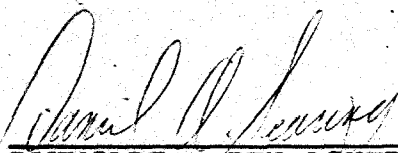
Yes, according to 1970 census.

18. Does defendant admit that a substantial portion of its developable land is readily amenable to sewer and water utility installation?

Yes.

19. Does defendant admit that there are no peculiar circumstances which require maintenance of the zoning ordinance provisions and land use practices listed in one through 13 above? If this is denied, list such peculiar circumstances and provide a summary of the facts supporting such circumstances.

This is not a proper question. However, if you so desire, I will forward to you factual contentions.



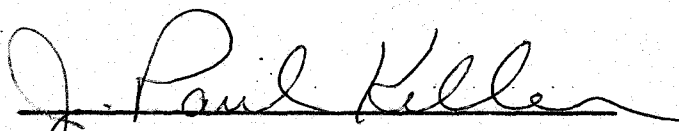
**BAUMGART & BEN-ASHER**  
134 Evergreen Place  
East Orange, New Jersey 07018

**MARTIN E. SLOANE**  
**DANIEL A. SEARING**  
**ARTHUR WOLF**  
National Committee Against  
Discrimination in Housing, Inc.  
1425 H Street, N.W.  
Washington, D.C. 20005  
Attorneys for Plaintiffs

**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:** June 12, 1975



**J. PAUL KELLER**  
Director of Planning and  
Development