

~~CA~~ - Old Bridge (Madison)

12/11/75

CA

Request for Admissions

5 pgs

CA001768 G

*Madeira*

RECEIVED

DEC 12 1975

BAUMGART & BEN-ASHER  
134 Evergreen Place  
East Orange, New Jersey 07018  
201-677-1400

MARTIN E. SLOANE  
DANIEL A. SEARING  
ARTHUR WOLF  
National Committee Against  
Discrimination in Housing, Inc.  
1425 H Street, N.W.  
Washington, D.C. 20005  
202-783-8150  
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.

:  
:  
:  
:  
:  
:  
:

Civil Action

REQUEST FOR ADMISSION

TO:

Louis Alfonso, Esq.  
325 Highway 516  
Old Bridge, New Jersey 08857

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

CA001768G

1. Does defendant Madison admit that its municipal zoning ordinance prohibits mobile homes?

Yes

2. Does defendant admit that the planned unit development section of its municipal zoning ordinance limits dwelling units per acre to:

a. 3.5 in Class I PUD? Yes

b. 4.5 in Class II PUD? Yes

c. 5 in Class III? Yes

d. 8 units of townhouses? No

e. 10 units of high density residential? No

3. Does defendant admit that single family lot sizes in all PUD classes must average 15,000 sq. ft. with a minimum lot area of 12,000 sq. ft. for each? Yes

4. Does defendant admit that as of 1970 it had 4,090 acres or 24.2 percent of its vacant developable land zoned for industry? No. It had 4,956 acres zoned for Commercial, Industrial and offices.

5. Does defendant admit that the Middlesex County Master Plan projects that the total acreage needed by Madison Township to accommodate existing and projected industrial uses by the year 2000 is 564? Yes

6. Does defendant admit that its 1970 minority population was 390 blacks, 545 Spanish-speaking and 239 other minority? Yes

7. Does defendant admit that its black population increased from 220 to 390 from 1960-1970? Yes

8. Does defendant admit that its population increased from 22,772 to 48,715 during 1960-1970? Yes

9. Does defendant admit that the number of building permits it issued between 1965 and 1973 was as follows:

	<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	1062	2167	129	628	787	62	69	28	36
Multi-family	886	1830	32	548	724	2	2	0	0

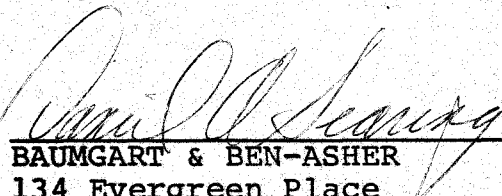
NO.

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

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

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

- Re # 1 - No apparent interest has been displayed by any applicants in the construction of mobile homes except for one in 1975 which was granted approval by the Zoning Board of Adjustment.
- Re # 2 - These are considered acceptable standards throughout the country for Planned Unit Development density.
- Re # 3 - For ecological and environmental reasons, 12,000 square feet is considered for protecting the health, safety and welfare of the residents thereof.
- Re # 4 - The Industrial zoning of 1970 was predicated on major construction being proposed for Old Bridge (Madison) Township. The question of what amount of industrial zoning is needed in Old Bridge (Madison) Township is presently under review.

  
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

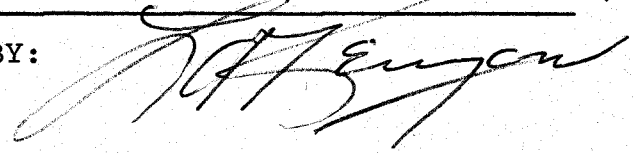
CERTIFICATION

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: Dec. 11/75

MAYOR AND COUNCIL OF THE TOWNSHIP  
OF OLD BRIDGE (MADISON TOWNSHIP)

BY:



L. A. Kenyon  
MANAGER