

CA-Plainshoro

June 18, 1975

- Request for Admission
- Cover letter to plaintiffs

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JOSEPH L. STONAKER
COUNSELLOR AT LAW
245 NASSAU STREET
PRINCETON, NEW JERSEY 08540
TELEPHONE: 921-2155
AREA CODE 609

Plainsboro
JUN 20 1975

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National Committee Against Discrimination in Housing Inc.
1425 H Street N.W.
Washington, D.C., 20005

Attention: Daniel A. Searing, Esquire

RE: Urban League of Greater New Brunswick, et al
vs. The Mayor and Council of the
Borough of Carteret, et al.
Docket No. C-4122-73

Dear Mr. Searing:

In reference to the above matter, enclosed herewith
please find original and one (1) copy of Request for Admission
answers on behalf of the Township of Plainsboro.

Very truly yours,


Joseph L. Stonaker

JLS:ns
Enclosures

cc: Baumgart & BenAsher, Esquires
All Counsel for defendants.

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JUN 20 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.

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:
:
:
:
:

Civil Action

REQUEST FOR ADMISSION

TO:

Joseph L. Stonaker, Esq.
245 Nassau Street
Princeton, New Jersey 08540

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

1. Does defendant admit that its municipal zoning ordinance requires that any house trailer which cannot be immediately removed to another site meet all zoning ordinance requirements for a residential structure?

Yes

2. Does defendant admit that its municipal zoning ordinance makes no provision for a trailer court or mobile home park or mobile home sites other than as a non-conforming use?

Yes

3. Does defendant admit that its municipal zoning ordinance limits multi-family dwellings to:

- a. Service residential zones? Yes
- b. Planned community development zones? Yes
- c. Planned multiple use development zones? Yes

4. Does defendant admit that in its multi-family dwelling or apartment house developments in service residential zones:

- a. units of more than two bedrooms are prohibited?
Yes

b. not more than ten percent of the total dwelling units shall be two bedroom units?

Yes

5. Does defendant admit that in its planned community development zone the following regulations apply:

a. that no multiple dwelling unit shall contain more than two bedrooms?

Yes

b. that not more than 25 percent of the total number of multiple dwelling units shall contain two bedrooms?

Yes

c. that townhouse units shall not exceed 20 percent of the total of the two bedroom units?

Yes

d. that a golf course, clubhouse and swimming pool must be provided by the owner?

Yes

6. Does defendant admit that as of February 1975 there were 1,000 vacant acres in the planned community development zone?

Yes, approximately

7. Does defendant admit that its R-200 zone requires minimum lot areas of 35,250 sq. ft. and minimum lot frontages of 200 ft.?

Yes

8. Does defendant admit that the R-85 zone requires a minimum lot area of 15,000 sq. ft.?

Yes

9. Does defendant admit that there are 2,565 vacant acres in the R-200 zone?

Yes , approximately

10. Does defendant admit that in its cluster residential development ordinance the following regulations apply:

a. that there be minimum lot areas of 15,000 sq. ft.? Yes

b. that average lot areas shall be not less than 25,000 sq. ft.? Yes, including open public lands, not actual lot area.

c. that minimum lot frontages be not less than 100 ft.?

Yes, but definition allows 100 ft. at mid-point of depth of lot.

11. Does defendant admit that in its planned multiple use development ordinance the following regulations apply:

a. that the minimum land area required is 500 contiguous acres: Yes

b. that there shall be an average of not more than eight dwelling units per acre of land?

Yes

c. that not less than one acre land must be set aside for common open space for every eight dwelling units? Yes

12. Does defendant admit that as of February 1975 there are 1,335 vacant acres zoned for industrial use?

Approximately

13. Does defendant admit that the Middlesex County Master Plan projects that total acreage needed by Plainsboro to accommodate existing and projected industrial uses by the year 2000 is 213?

Defendant does not have sufficient information to either admit or deny.

14. Does defendant admit that the number of building permits it issued between 1965 and 1973 was as follows: No

	<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	6	9	6	9	9	3	3	485	587
Multi-family	0	0	0	0	0	0	0	480	584

The number of building permits issued for single family in 1972 was 6. The number of building permits issued for single family in 1973 was 3.

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

Yes

16. Does defendant admit that its 1970 minority population was 65 black, seven Spanish-speaking and 31 other minorities? Yes

17. Does defendant admit that its black population decreased from 80 to 64 during the period 1960 to 1970?

Yes

18. Does defendant admit that its population increased from 1,171 to 1,648 from 1960 to 1970?

Yes

19. Does defendant admit that a substantial portion of its developable land is readily amenable to sewer and water utility installation? No.

Utilities should be related to a comprehensive land use plan and not installed at random.

There are strict limits on sanitary treatment facilities and approvals on expansion. No surplus treatment capacity is available.

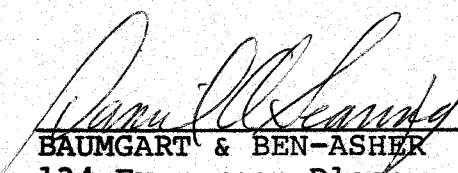
20. Does defendant admit that there are no peculiar circumstances which require maintenance of the zoning ordinance provisions and land use practices listed in one through twelve above? If this is denied, list such peculiar circumstances and provide a summary of the facts supporting such circumstances.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

Much of Plainsboro Township is Class I and II Farmland and the Blueprint Commission on the Future of Agriculture in New Jersey has recommended that much of this land be preserved as farm land.

The Middlesex County Master Plan calls for maintaining most of the area east of the Penn Central Railroad in very low density development.

Plainsboro has limited sanitary sewer facilities and surplus treatment capacity is not available.

Plainsboro has an inadequate road system and limited community facilities. Plainsboro must consider the possibilities of pollution of the Millstone River.

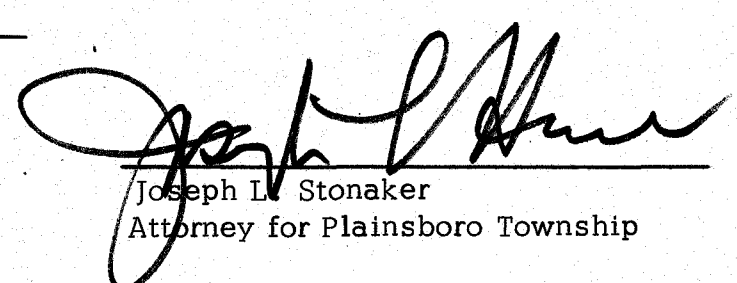

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CERTIFICATION

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: June 18, 1975


Joseph L. Stonaker
Attorney for Plainsboro Township