

CA - 0+4 v. Old Bridge

12/30/86

certification of Carl Hintz, professional  
Planning Consultant for twp of  
Old Bridge

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CA 002369 ✓

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URBAN LEAGUE OF GREATER NEW BRUNSWICK, et al.,  
 Plaintiffs,

SUPERIOR COURT OF NEW JERSEY  
 CHANCERY DIVISION  
 MIDDLESEX COUNTY/  
 OCEAN COUNTY

v.

THE MAYOR AND COUNCIL of the BOROUGH OF CARTERET, et al.,  
 Defendants,

and

O & Y OLD BRIDGE DEVELOPMENT CORPORATION, a Delaware Corporation,  
 and

WOODHAVEN VILLAGE, INC., a New Jersey Corporation,

Plaintiffs,

v.

THE TOWNSHIP OF OLD BRIDGE in the COUNTY OF MIDDLESEX, a Municipal Corporation of the State of New Jersey, THE TOWNSHIP COUNCIL OF THE TOWNSHIP OF OLD BRIDGE, THE MUNICIPAL UTILITIES AUTHORITY OF THE TOWNSHIP OF OLD BRIDGE, THE SEWERAGE AUTHORITY OF THE TOWNSHIP OF OLD BRIDGE AND THE PLANNING BOARD OF THE TOWNSHIP OF OLDBRIDGE,

Defendants,

(Mount Laurel II)  
 DOCKET NO. C-4122-73

SUPERIOR COURT OF NEW JERSEY  
 LAW DIVISION  
 MIDDLESEX COUNTY/  
 OCEAN COUNTY  
(Mount Laurel II)

DOCKET NO. L-009837-84 P.W.  
 and NO. L-036734-84 P.W.

Civil Action

CERTIFICATION OF  
 CARL HINTZ

1. I am a professional Planning Consultant for the Township of Old Bridge and have been since April of 1984, and I am thoroughly familiar with the facts of the within matter.
2. During the latter part of 1984 and throughout 1985, I was responsible for review of development proposals by O & Y Old Bridge Development Corporation ( O & Y) and Woodhaven Village, Inc. (Woodhaven), for the purpose of providing low and moderate income housing in conjunction with a development application for a new town which to my knowledge is the largest single development proposal applied for in New Jersey and in the northeastern United States. I was informed by representatives of O & Y and Woodhaven that extensive planning and environmental analyses were prepared regarding the sites which consisted of approximately 4,095 acres. More specifically, I was informed that Sullivan-Arfaa, a professional planning organization, was responsible for the planning and environmental analysis for the O & Y parcel and that Wallace, Robert, and Todd were responsible for the planning for Woodhaven and that Dresdner Associates was responsible for the environmental analysis for Woodhaven. To my knowledge these consultants have excellent reputations and I relied upon their work product regarding environmental analyses. Additionally, at various meetings involving representatives of O & Y and Woodhaven I was assured that all reports pertaining to environmental concerns would be presented to the Planning Board at public hearings to consider the applications.

3. Initially, the new town plans set forth in Plates A and B did not contain sufficient detail for my analysis for planning purposes. O & Y and Woodhaven prepared Plates A-1 and B-1 respectfully including planning for design parameters for a new town as a single comprehensive entity.

Based upon my review of these proposals, I recommended approval of the proposed settlement agreement based upon the following factors;

- a. The gross density of four units per acre over the entire site allowed for a variety of housing types and densities, as well as open space for active and passive recreational activities.
- b. Old Bridge Township's fair share responsibility would be satisfied in large part by experienced builders. The plans included a substantial economic base and opportunities for employment for residents of the new town through the provision of regional office complexes and regional shopping centers as well as job opportunities for service based employment uses located within the new town. These same provisions also provided for a substantial ratable base for township taxing purposes.
- c. The comprehensive design of the town allowed for efficient transportation of goods services, and residents within the development and encouraged social and economic integration.
- d. The new town plan included a road system that integrated the O & Y site and Woodhaven site as well as

the rest of the community by means of the Trans Old Bridge Turnpike. This latter consideration made unnecessary additional public transportation and helped to solve existing off-site transportation difficulties.

- e. The plans would include a storm drainage system as well as public water and sewer provisions at locations that permitted varying development densities and types of housing. Use of the village concept also made possible an elementary and secondary educational system in terms of sound planning by eliminating unnecessary bussing and promoting pedestrian access to the schools.
4. In my opinion every one of the benefits listed in paragraph three will be lost and the new town plan cannot function if 30% or more of the 4,000 acres are delineated as wetlands and are not available for development purposes or for active recreation. Proposed development will be intensified on relatively small islands of uplands with a consequent loss of housing variety and housing density choices.

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

Dated: December 30, 1986

  
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CARL HINTZ, P. P.