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August 11, 2020  
70573 00

Attn: Ms. Denise Schmied, Secretary  
Southampton Township Zoning Board  
5 Retreat Road  
Southampton, NJ 08088-3591



Re: Richards Mobile Home Court, LLC: 12 Richards Court (Interior Lot 774)  
150 Route 530  
Block 701, Lot 4.01  
Map or Ordinance Interpretation of a Special Question (NJSA 40:55D-70b)  
Use Variance to Erect Single-Family Detached Dwelling (NJSA 40:55D-70d)

Dear Board Members,

We have reviewed an application for the development of the property referenced above, which included the following documents:

1. Cover Letter from Travis J. Richards, Esq. of the Law Offices Weishoff and Richards, LLC in Mount Holly, NJ dated May 19, 2020;
2. Township Planning Board and Zoning Board Application Form, undated;
3. Trailer Park Utilities Layout plan prepared by John C. Miller PE of T.I.D.E.S. Co., Inc. in Lumberton, NJ dated 10/10/07 and last revised 5/13/20.

**General Information**

Applicant / Owner: Richards Mobile Home Court, LLC  
150 Route 530  
Southampton, NJ 08088

Applicant Attorney: Travis J. Richards, Esq.  
Law Offices Weishoff and Richards, LLC  
141 High Street  
Mount Holly, NJ 08060

Applicant's Engineer: John C. Miller, PE  
T.I.D.E.S., Co., Inc.  
378 Main Street  
Lumberton, NJ 08048

**Development Proposal**

The Applicant proposes to place a single-family detached dwelling, consisting of a double-wide mobile home, on an existing crawl space foundation in a mobile home park. The mobile home park is a pre-existing, non-conforming use in the Pinelands Area's Agricultural Production (AP) district. The Applicant requests the following from the Zoning Board of Adjustment:

1. An ordinance interpretation of a special question regarding whether the replacement of a mobile home requires a use variance, although the Applicant did not specify which type of use variance.
2. If the Board determines that construction of this dwelling in the mobile home park, as described, requires a specific type of use variance, then that type of use variance.

3. A variance from §12-2.3 to permit the use of a [temporary] crawl space foundation for this dwelling. This is because the Land Development Ordinance's definition of "mobile home" prohibits the temporary foundations.

### **Completeness Review**

#### **A. Pinelands Certificate of Filing (C/F)**

Certificates of Filing (C/Fs) are issued by the Pinelands Commission pursuant to N.J.A.C. 7:50-4.34 to indicate to municipal and county approval agencies that a complete application for development has been filed with the Commission and to enable Applicants to seek municipal or county approval for their proposed development.

**The application did not include a C/F or documentation from the Commission that the proposed development is exempt from Commission review. For this reason, we recommend that the Zoning Officer find the application incomplete.**

#### **B. D Variance Checklist**

The application did not include a completed checklist, nor did it request a waiver of any submission items. Checklist Item #4 requires a "Current Survey and/or Site Plan." The submitted engineering drawing is a schematic plan of the water and wastewater infrastructure for the 68-unit mobile home park and site manager's house and maintenance facilities, which has been annotated to show proposed home layouts. This document refers to a 7/21/07 survey prepared by Ralph S. Hartman, PLS.

**We also recommend that the Zoning Officer find the application incomplete because it did not include a current survey or site plan.** In addition, the application should include the following:

1. Chronology of improvements and occupancy 12 Richards Court (Interior Lot 774) indicating:
  - a. The type(s) of temporary and permanent mobile home foundation(s) on the lot and when permitted and constructed;
  - b. The type and size of mobile homes on Lot 12; and
  - c. How long Lot 12 has been vacant.
2. Statement regarding whether Lot 12 has been unoccupied for less than 25 years and whether it had an original foundation that will be re-used constitute the footprint of the dwelling.

We reserve the right to further comments as additional information becomes available. Should you or the Applicant have any questions, please feel free to contact the undersigned.

Sincerely yours,



Rakesh R. Darji, PE, CME, PP  
Zoning Board Engineer



Edward Fox, AICP, PP  
Zoning Board Planner

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cc: Richards Mobile Home Court, LLC, Applicant  
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