

7/22/2026
Manchester Township Planning Board
ATTN: Ms. Amanda Kisty
1 Colonial Drive
Manchester, NJ 08759

RE: 3250 Wilbur
Block 59, Lots 649, 650, 651, 652
Wilbur Avenue
Manchester, NJ
PB-2024-13 (Preliminary & Final Major Subdivision)
Civil Core Consulting No. 23172

Dear Amanda,

On behalf of our client 3250 Wilbur LLC, Civil Core Consulting respectfully submits the following:

- R-40 Comparison Plan titled "Preliminary/Final Major Subdivision for Wilbur Avenue - R-40 Comparison Plan" dated 7/21/26 prepared by Civil Core Consulting
- Submission Waiver letter
- Updated EIS dated 5/23/23 prepared by DuBois & Associates
- FHA verification approval dated 1/13/25
- FHA Verification Plan
- Five (5) copies of the Site Plans titled "Preliminary/Final Major Subdivision for Wilbur Avenue" last revised 7/2/26 prepared by Civil Core Consulting plus ten (12) reduced size copies
- Two (2) copies of the SWM report titled "Stormwater Management Report Wilbur Avenue Subdivision" last revised 7/13/26 prepared by Civil Core Consulting
- Markup Response to draft engineering review letter dated 6/4/26

Our responses are indicated in bold type following the comments contained in the following:

- October 8, 2024, Township Engineer's Completeness letter prepared by Mathew Wilder of Morgan Engineering
- January 15, 2025, Board Planner's review letter prepared by Nick Dickerson of Colliers

October 8, 2024, Township Engineer's Completeness letter prepared by Mathew Wilder of Morgan Engineering

1. #B.30 – Sight Triangles.

Applicant has not submitted. Applicant has indicated that it will be provided as a condition of approval once the layout is approved. Our office has no objection to this submittal being waived for completeness purposes. Although, the dedication of sight triangle easements will remain an ongoing condition of approval if deemed complete.

Sight triangles have been added to the plans.

2. #B.31 – Proposed street names when new street is proposed.

Applicant has not submitted. Our office has no objection to this submittal being waived for completeness purposes, but must be included on site plan for future approval.

Proposed street names will be provided during resolution compliance should the application be approved.

3. #B.47 – Copy of plat and plans on a CD in a .dxf file format if the plat or plans are drawn with the aid of a computer in AutoCAD or GIS format.

Applicant has not submitted. Applicant has indicated that it will be provided as a condition of approval. Our office has no objection to this submittal being waived for completeness purposes but will remain a condition of approval for site plan approval.

CAD files of the final design will be provided should the application be approved.

4. #B.48 – Two copies of the final map as filed with the Ocean County Clerk shall be filed with the Township Tax Assessor and Engineer.

Applicant has indicated that it will be provided as a condition of approval. Our office has no objection to this submittal being waived for completeness purposes but will remain a condition of approval for site plan approval.

The final filed plat will be provided once approved.

January 15, 2025, Board Planner's review letter prepared by Nick Dickerson of Colliers

Applicable Land Use Controls

The subject property is located in the R-40 zone district. The district permits residential development as a principal permitted use, and cluster residential development as a conditional use.

Cluster development, which is a permitted conditional use in the zone, subject to the requirements of 245-70:

A. Plat map. The subdivider shall submit a plat map showing the development according to the requirements of the R-40 Zone regulations contained in Schedule A, Zoning Districts Schedule, § 245-31B, and another plat map showing the development as modified in accordance with this subsection.

We note that this has been provided by the Applicant.

B. Approval. All lands shall be dedicated to a homeowners' association, and the approving agency shall condition final approval upon the establishment of a homeowners' association.

C. Dedication of open space. All open space areas of the tract being subdivided shall be dedicated and conveyed by the owner, in fee simple absolute, by a good and sufficient deed.

D. Application requirement. All approvals for such major subdivisions as permitted hereunder, together with the standards of dedication and sanitary approval, shall be in accordance with the subdivision regulations of this chapter.

E. Density regulation. In no event shall the density of development of the entire subdivision tract exceed the exact number of dwelling units that would have been permitted to be built if such development had proceeded on the basis of 40,000 square feet per lot with a width of not less than 200 feet.

The Applicant shall provide testimony, and in the case of subsection A, the required plat maps, as to how each of these conditions will be met by the proposed development. The Board should note, that as a conditional use, any deviation from the above requirements will require a d(3) conditional use variance from the Board of Adjustment.

The Applicant has provided a plat map showing a conventional subdivision, addressing subsection A. This plan shows 16 lots (3 more than the 13 proposed as part of the cluster development), each measuring 40,000 square feet or greater, which addresses one of the requirements of Subsection E. The Applicant shall note, however, that the other requirement is that each “conventional” lot would need to meet a lot width of 200 feet. The table on the conventional comparison document suggests that 150 feet is the requirement, and that each lot has a width of greater than 150 feet. This table should be revised with the correct standard—200 feet—and the measurements for each lot to confirm that they meet this dimensional requirement.

The table has been revised.

In addition to providing the lot width calculations for the conventional subdivision concept, the Applicant will still need to provide testimony and other supporting evidence that the proposed development meets the remaining conditional use requirements of subsections B, C, and D. As noted in section F of our letter, there are requirements from Section 245-82 (Site plan and subdivision design) where the Applicant will need to demonstrate compliance.

Testimony will be provided.

C. Proposed Conditions

As noted previously, the Applicant is seeking to divide the subject properties into 13 residential lot as part of a cluster subdivision. The residential street would be dedicated and the remainder section would contain some of the stormwater improvements and would appear to be vacant.

All of the proposed residential lots appear to comply with the bulk requirements of the zone, as modified by the cluster subdivision requirements. There are several items where the Applicant shall provide clarification to determine if any variances are required. Those questions are listed in the comments section of this letter.

Informational.

D. Variances

The Applicant has not requested variance relief for this Application. As noted in the previous section, our review identified several areas which will require clarification from the Applicant to determine if variance relief will be required. This will include demonstrating compliance with each of the conditional use requirements to ensure that the application can be heard by the Planning Board.

Testimony will be provided.

E. Waivers/Exceptions

The Applicant has not requested relief from any of the other sections of the Township’s land development ordinance. Based on our review, however, the Applicant will require design exceptions from the following requirements:

1. Per section 245-82F of the code, plans shall be prepared by a landscape architect.

The design has been prepared by a landscape architect, however they have been signed by an engineer, as allowed by MLUL. A waiver is requested for initial submission. Plans can be signed by an LA for future submissions if required by the board.

2. 245-81K (1) Dead end streets and cul-de-sac shall not be longer than 600 feet. Based on our measurements, the street appears to be longer than 600 feet. *The Applicant has provided a memo from*

NJ DCA, which states that municipal regulation of cul-de-sac maximum length requirements are unenforceable. As such, we agree that a design exception is not required.

Informational.

3. 245-81 H: (5) No trees shall be planted within 25 feet of an intersection. At least one of the proposed trees on proposed Lot 5 appear to be within 25 feet of the proposed intersection.

The location of the tree was adjusted.

In addition to the above, the Applicant has not submitted architectural elevations of the proposed dwellings. While this is a submission waiver as opposed to a design exception, architectural elevations are necessary to determine compliance with the Township's architectural and building requirements (Section 245-82C). Any deviations from that section would require a design exception. The Applicant's September response memo indicates that the lots will be sold individually, and that the buyers will develop their own architectural plans.

Testimony will be provided.

F. Comments

1. The Applicant shall provide testimony on compliance with the conditional use requirements for a cluster subdivision development. This is necessary to determine the appropriate jurisdiction of the application.

Testimony will be provided.

2. The EIS refers to the proposed development containing 11 single family dwellings. The plans submitted show 13 single family dwellings. The Applicant shall clarify and be prepared to address how the proposed subdivision changes any of the findings of the EIS.

An updated EIS is enclosed.

3. The building footprint shown on proposed Lot 10 appears to be situated within the setbacks. The Applicant shall clarify to determine if variance relief will be requested.

The building footprint has been adjusted to ensure it is not within the setbacks.

4. The Applicant shall provide testimony to demonstrate how the project was designed in consideration of section 245-82D (Environmental Design Requirements):

(1) Site design shall be arranged to conserve the following features:

(a) Critical areas, as defined, and subject to preemption of the State of New Jersey over freshwater wetlands.

(b) Habitats of endangered or threatened species as identified on federal or state lists.

(c) Significant trees, defined as the largest known individual trees of each species in New Jersey listed by the New Jersey Department of Environmental Protection, Bureau of Forestry; and/or large trees approaching the diameter of the known largest tree; and/or species that are rare to the area or particular horticultural or landscape value.

(d) Woodlands in coordination with the tree removal and planting plan required by the ordinance creating the Manchester Township Shade Tree Commission.

Testimony will be provided.

5. In addition to the above, subsection 2(f) of the Environmental Design Requirements contains restrictions on disturbance of steep slope areas. The Applicant shall demonstrate compliance with this requirement.

Steep slope areas have been added to the existing conditions plan. Testimony will be provided.

6. Also, subsection 2(g)[2] of the Environmental Design Requirements requires a 150 setback from streams when septic systems are utilized. The Applicant shall demonstrate compliance with this requirement or request the necessary relief.

The proposed septic systems are more than 150' from the stream.

7. Per 245-82G of the code, open space is required for cluster development. Presumably, this is the intention of proposed Lot 15. This should be noted in the plans, as the Subdivision Plat identifies it as "vacant land."

This has been noted in the plans.

8. In addition to the above, 245-82 G1 specifies that at least 25 percent of the gross tract area shall be restricted as common open space. Additionally, subsection "a" requires that the open space area shall not be encroached upon by any of the following: freshwater wetlands, wetlands transition areas, detention basins, the area of the one-hundred-year floodplain, floodways, steep slopes 15% or greater, existing easements, buildings, parking lots, and private space, such as patios or yards not available for common use. The Applicant shall demonstrate compliance with this section, or request the necessary relief.

A waiver is requested. Testimony will be provided.

9. Furthermore, Subsection 2 (245-82 G(2)) requires a circulation plan showing a path system throughout the development which provides reasonable access to both the developed and undeveloped common spaces, with no accessway to common open space being less than 10 feet in width. The applicant shall demonstrate compliance with this section, or request the necessary relief.

A waiver is requested. Testimony will be provided.

10. Also furthermore, subsections 5 and 6 (245-82 G(5)&G(6)) relate to the preferred dedication and deed restrictions associated with open space. The Applicant shall provide testimony how the proposed development will comply.

Testimony will be provided.

11. The plans do not show how each proposed lot complies with the minimum improvable lot area requirements for the zone. These shall be added to the plans. The Applicant shall provide testimony demonstrating compliance with this section or request the necessary relief. *Subsequent review with the Township Zoning officer indicated that the minimum improvable lot area requirements are not applicable in the event of a cluster subdivision.*

Informational.

12. The plans show proposed sidewalks extending along Wilbur Avenue west to the property line, while the sidewalks east of the entrance road terminate just after the intersection. The Applicant shall clarify.

Wilbur Avenue to the east of the site is not developed and interrupted by a stream crossing and environmentally constrained areas.

13. As noted above, the Applicant has not submitted architectural elevations. The Applicant shall provide testimony on the number of bedrooms anticipated on each lot, and how the proposed development will comply with the off-street parking requirements.

Testimony on the number of bedrooms will be provided. A parking calculation table has been added to the plans.

14. Plans indicate that the subject tract contains a floodplain. Has the applicant supplied a flood hazard area verification from NJDEP? *While the Applicant has provided plans and a report, confirmation from the NJDEP will still need to be submitted.*

Flood hazard area verification is enclosed.

15. The Applicant is encouraged to bring in examples of building materials and/or provide conceptual renderings of the proposed building.

Informational.

16. The Applicant shall provide evidence of all outside approvals.

Informational.

If you have any questions, please contact me at 732-962-9720 ext.101 or yportnoy@civilcoreconsulting.com.

Thank you,



Yosef Portnoy,
Principal