



November 30, 2020

**Via FedEx**

Township of Willingboro, NJ  
Zoning Board of Adjustment  
1 Rev Dr. Martin Luther King Dr.  
Willingboro, NJ 08046

**RECEIVED**

**DEC 01 2020**

**OFFICE OF THE TOWNSHIP CLERK**

**Re: Kin Property #4547 – 4320 US Route 130, Willingboro, NJ (the “Kin Property”)**

**Notice of Public Hearing (the “Notice”) for Application of NE Willingboro, LLC (“Applicant”) to the Zoning Board of Adjustment for the Town of Willingsboro (the “Board”) for a Minor Site Plan Approval, Waiver of Formal Site Plan Review, Conditional Use Variance Approval, Conditional Use Approval and Bulk Variance Approval (Application 2020-2) (the “Application”) for the property known as the Grand Marketplace, located at 4340 US Route 130, Willingboro, NJ (the “Subject Property”)**

Ladies and Gentlemen:

Kin Properties Inc. serves as managing agent for Sanlyse LLC (“Owner”), the owner of the above-referenced Kin Property. In that capacity, we received the enclosed Notice as the Kin Property is located directly to the east of the Subject Property.

On behalf of the Owner, we strenuously object to the approval of zoning changes to allow for the development and operation of a commercial vehicle parking and storage facility as a conditionally permitted use and the attendant modifications to the Subject Property described in the Notice, including, without limitation, the installation of security fencing and a security building and the elimination of the required buffering.

These modifications will be inconsistent with the character of the area. Without significant restriction and oversight, our experience is that these types of uses tend to deteriorate quickly and become storage yards for debris, refuse and salvage. Additionally, vehicle parking and storage often results in conditions that contribute to environmental contamination, as vehicle repairs and maintenance are often performed at these locations (even if specifically prohibited by code or regulation). Further, if the change in property lot coverage is permitted, such change would permit an additional 25% of property lot coverage for that new, inconsistent use.

We also note that decreasing the 25’ setback for parking from Route 130 and Sunset Road may compromise visibility and safety from the road, and should not be approved without appropriate traffic studies and enhanced traffic controls.

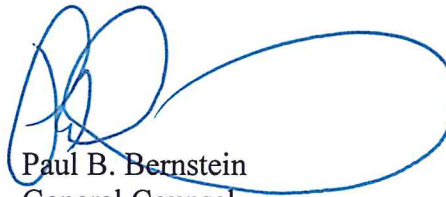
Based on the foregoing, we request that the zoning change not be granted.

We ask that this letter be shared with all members of the Zoning Board of Adjustment and any and all relevant governmental officials. It also should be placed in the Public Record of the proceedings.

Thank you.

Very truly yours,

KIN PROPERTIES, INC.



Paul B. Bernstein  
General Counsel

Phone No: 561-620-9200, Ext. 175

Email: [pbernstein@kinproperties.com](mailto:pbernstein@kinproperties.com)

PB:wn  
Enclosure

cc (via Fedex w/enc.):  
Modern Furniture Outlet  
30 N. Blake Horse Pike  
Bellmawr, NJ 08031

(via e-mail w/enc.):  
Lee Cherney  
Jeff Ross  
Anna Gaita

## NOTICE OF PUBLIC HEARING

**PLEASE TAKE NOTICE** that upon the Application of NE Willingboro, LLC (the "Applicant"), the Zoning Board of Adjustment for the Township of Willingboro (the "Zoning Board") shall conduct a virtual public hearing on Wednesday, December 2, 2020, commencing at 7:30 p.m. (beginning with a conference meeting session at 7:30 p.m. followed by a formal meeting session by 8:00 p.m.) to consider a request for Minor Site Plan Approval, Waiver of Formal Site Plan Review, Conditional Use Variance Approval, Conditional Use Approval and Bulk Variance Approval (Application 2020-2) to allow for the development and operation of a commercial vehicle parking and storage facility as a conditionally permitted use of the surface parking lot of an existing commercial property known as The Grand Marketplace, located at 4340 U.S. Route 130, within a B-1 Primary Business Zoning District, the RZO Route 130 Redevelopment Zone Overlay Area, owned by the Applicant, and more particularly known as Block 2, Lot 7.01 on the Official Willingboro Township Tax Maps (the "Property").

In addition to Minor Site Plan Approval, Waiver of Formal Site Plan Review and Conditional Use Approval, Applicant is requesting that the Zoning Board grant Conditional Use Variance Approval for relief from the Ordinance Section 155-3 to allow the installation of a security fence with a six (6) foot height (i) within in the front yard areas of the Property; and (ii) that will have as many as five (5) gates where no more than three (3) gates are allowed.

At the same time, Applicant will also request that the Zoning Board grant Bulk Variance Approval to allow relief (i) for site buffering that is less than the 100 feet of buffering required by the Ordinance Section 370 – 74.C(2); (ii) to allow existing and proposed parking within twenty-five (25) feet of Route 130 and Sunset Road where Ordinance Section 370-75D requires a minimum parking distance of twenty-five (25) feet; (iii) from Ordinance Section 370-13N(6) to allow a security building to be located in the front yard area of the Property; and (iv) to allow the existing Property lot coverage of seventy-six (76) percent where fifty (50) percent is allowed.

During the course of the Zoning Board review of the Application (Application 2020-2) and/or the Applicant's presentation of the Application it is possible that variances, waivers and/or other exceptions from the requirements of the Willingboro Township Zoning Code may be identified or deemed to be necessary to permit approval of the Application as submitted or with such changes as may be requested or accepted by the Zoning Board. This notice is to advise you that such additional variance, exception and/or waiver relief may be requested by the Applicant at the time of the hearing.

At the same time of the Zoning Board hearing on the Application (Application 2020-2), the Applicant will request that the Zoning Board grant any and all approvals, submission waivers, design waivers, variances, or other relief necessary to allow for the development of the Property as proposed by the Applicant.

Anyone affected by this Application (Application 2020-2) will have the opportunity to appear in person, by agent or attorney at a meeting of the Zoning Board to be held on Wednesday, December 2, 2020, commencing 7:30 p.m. to present any support or objection they may have for the Approval of this Application.

The December 2, 2020, hearing before the Zoning Board will be held by way of an on-line platform that allows participation by computer or telephone. Only those attending virtually before the Zoning Board to provide sworn testimony must appear by video in addition to audio. The public will not be permitted to physically attend the meeting (in order to protect the community and honor social distancing guidelines due to the COVID-19 pandemic). Members of the public can participate in the Zoning Board hearing by joining the meeting on December 2, 2020, commencing at 7:30 p.m. by telephone or by computer via the internet.

THE INSTRUCTIONS FOR JOINING THE ZONING BOARD MEETING VIA TELEPHONE OR COMPUTER ARE AS FOLLOWS:

Topic: Zoning Meeting

Time: December 2, 2020 07:30 PM Eastern Time (US and Canada)

**TO JOIN ZOOM MEETING:**

Type in address bar: <https://zoom.us>  
Click " Join Meeting" on the top menu bar  
Meeting ID:867 0173 3189  
Password:024314

**Join Zoom Meeting**

<https://us02web.zoom.us/j/86701733189?pwd=RTFWZ1M4MTZFRFRydExNS0xUTEiCZz09>

Meeting ID: 867 0173 3189

Passcode: 024314

**One tap mobile**

+13126266799,,86701733189#,,,,,0#,,024314# US (Chicago)  
+16465588656,,86701733189#,,,,,0#,,024314# US (New York)

**Dial by your location**

+1 312 626 6799 US (Chicago)  
+1 646 558 8656 US (New York)  
+1 301 715 8592 US (Germantown)  
+1 346 248 7799 US (Houston)  
+1 669 900 9128 US (San Jose)  
+1 253 215 8782 US (Tacoma)

Meeting ID: 867 0173 3189

Passcode: 024314

Find your local number: <https://us02web.zoom.us/j/86701733189>

MEETING DATE:	December 2, 2020
MEETING TIME:	7:30 P.M.
SERVICE:	ZOOM CONFERENCE CALL

ACTION WILL BE TAKEN AT THIS MEETING.

THIS MEETING WILL BE HELD IN COMPLIANCE WITH THE OPEN PUBLIC MEETING ACT.

The Zoning Board may at its discretion, adjourn, postpone, or continue the said hearings from time to time, and you are hereby notified that you should make diligent inquiry of the Planning Board Secretary concerning such adjournments, postponements, or continuations.

All documents relating to this Application (Application 2020-2) are on file with the Zoning Board of Adjustment Secretary in the Township of Willingboro Zoning Board of Adjustment Office in the Willingboro Township Municipal Complex located at One Rev. Dr. M. L. King Drive, Willingboro, New Jersey 08046 – 2853 and may be inspected and reviewed by the public via the Township of Willingboro website, <https://www.willingboronj.gov>, or if you are unable to access the Application (Application 2020-2) documents via the Township of Willingboro website, by contacting the Zoning Board of Adjustment Secretary whose telephone number is (609) 877 – 2200, Extension 1030, and email address is [rfrank@willingboronj.gov](mailto:rfrank@willingboronj.gov).

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Haddonfield, New Jersey 08033  
Attorneys for Applicant  
856-795-2121