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KNPB-R6050

April 8, 2026

MacKenzie Bittle, Planning Board Secretary
Borough of Keansburg
29 Church Street
Keansburg, NJ 07734

**Re: Proposed 1-Story Addition with Bulk Variances
Shirley Eddings
49 St. John's Place
Block 178, Lot 1.01
Single Family Residential (R-7) Zone
First Engineering Review**

Dear Ms. Bittle:

As requested, we have reviewed the above referenced application to construct a 1-story addition at the rear façade of the existing 1-story dwelling, located at 49 St. John's Place. The applicant has submitted the following documents in support of this application:

1. Site Plan & Zoning Analysis prepared by Robie J. Wood, AIA of RJWA Architect, dated March 20, 2026, consisting of one (1) sheet.
2. Architectural Floor Plans & Elevations prepared by Robie J. Wood, AIA of RJWA Architect, dated June 17, 2025, consisting of two (2) sheets.
3. Survey prepared by Andrew J. Kirtland, P.L.S., of KTJ Associates, LLC, dated February 27, 2026, consisting of one (1) sheet.
4. Elevation Certificate, prepared by Andrew J. Kirtland, P.L.S., of KTJ Associates, dated August 27, 2025.
5. Zoning Denial Letter dated October 17, 2025.
6. Planning Board Application dated November 3, 2025.

A. Project Description

The subject property, also known as 49 St. John's Place, is a developed lot located within the Single Family Residential (R-7) Zoning District with frontage along St. John's Place to the south containing a 1-story frame dwelling, an enclosed porch and wood deck with steps leading to a concrete patio and a shed in the rear yard. The property is bound by St. John's Park to the west and similar residential lots to the north and east. Access to the property is via an existing curb cut access driveway extending from St. John's Place. The property is located in the "AE" Flood Zone, with a flood elevation of 11 feet.

The applicant is seeking approval for the construction of a 400 SF one-story addition at the rear façade of the existing 1-story dwelling with an associated attached rear deck with steps and walkway along the west side of the proposed addition. The addition includes a new family room and expansion of the existing kitchen to include a nook area. The remaining existing space depicts a living room, a dining room, a laundry/mechanical room, a full hallway bathroom and two (2) bedrooms whereas one bedroom includes a powder room.



B. Bulk Requirements

In accordance with Section 22-5.4 of the Ordinance, the required and proposed bulk deficiencies for the proposed dwelling are noted as follows:

	DESCRIPTION	REQUIRED	EXISTING	PROPOSED
1	Minimum Lot Area	7,500 SF	7,082.5 SF ^(E)	No Change ^(V)
2	Minimum Lot Frontage	75'	50' ^(E)	No Change ^(V)
3	Minimum Front Yard Setback	25'	27.44'	No Change
4	Minimum Side Yard Setback	10'	6.9' ^(E)	4.7' ^(V)
5	Minimum Side Yard Setback - <i>Total</i>	20'	30'	27.8'
6	Minimum Rear Yard Setback	25'	27.5'	15.7' ^(V)
7	Min. Gross Residential Ground Floor Area	800 SF	903 SF	754 SF
8	Maximum Lot Coverage – <i>Principal Bldg.</i>	25%	19%	24%
9	Maximum Lot Coverage – <i>All</i>	40%	42% ^(E)	44% ^(V)
10	Maximum Building Height	2.5-Story (35')	1.5-Story (14.7')	No Change
11	Minimum Improved Off-Street Parking*	2	0	2

(E) – Existing Nonconformity

(V) – Variance

*Exhibit 1, (Subsection 22-9.3) of the Ordinance requires a total of two (2) Off-Street Parking Spaces for the proposed 3-bedroom, single-family frame dwelling. Specifically, Section 22-9.3. a.5 states “*A one-car garage and driveway combination shall count as 2 off-street parking spaces, provided the driveway measures a minimum of thirty (30') feet in length between the face of the garage door and the sidewalk or thirty-five (35') to the curbline. Two-car garage and driveway combination shall count as 4.0 off-street parking spaces, provided the minimum width of the driveway is twenty (20') feet and its minimum length is as specified above for a one-car garage.*”

The proposed asphalt driveway is approximately 17' wide by 68'+ long and appears capable of accommodating two (2) parking spaces. The applicant shall revise the plan to delineate two (2) parked vehicles within the driveway.

C. Dimensional “c” Variance Considerations

Upon hearing testimony and input from the public (if any), the Board should evaluate the positive and negative criteria set forth below to determine whether the Applicant has met its burden of proof for a “c(1)” or “c(2)” variance for the bulk conditions and pre-existing non-conformities noted in the chart above, as well as variances per the below Sections of the Ordinance regarding construction of non-compliant structures, as listed below:

1. Section 22-5-2.c of the Ordinance states that no building or structure shall hereafter be erected and no existing building or structure shall be moved, altered, added to or enlarged, nor shall any land or building or portion of a building or structure to be used, designed, or arranged to be used for any purpose unless in conformity with all of the regulations herein specified for the district in which it is located. **The applicant proposes to construct a one-story addition & alteration of the existing 1-story dwelling which does not meet the bulk regulations of the R-7 Zoning District.**



2. Section 22-7.3.c of the Ordinance states that no nonconforming use may be expanded. **The applicant proposes to construct a one-story addition & alteration of the existing 1-story dwelling which does not meet the bulk regulations of the R-7 Zoning District.**

1. Positive Criteria for “c(1)” Hardship Variance

The finding of a “c(1)” hardship would address the following:

- a. *by reason of exceptional narrowness, shallowness or shape of a specific piece of property, or*
- b. *by reason of exceptional topographic conditions or physical features uniquely affecting a specific piece of property, or*
- c. *by reason of an extraordinary and exceptional situation uniquely affecting a specific piece of property or the structure lawfully existing thereon, or the strict application of any regulations...would result in peculiar and exceptional practical difficulties to, or exceptional and undue hardship upon the developer of such property.*

It should be noted that the finding of the hardship must be for the specific property in question (i.e., it must be unique to the area). Note also that a hardship variance cannot be granted by a self-created hardship or personal hardship of the applicant.

2. Positive Criteria for “c(2)” flexible variance

The finding of a “c(2)” flexible variance to permit relief from zoning regulations where an alternative proposal results in improved planning would address the following:

- a. *The purposes of the MLUL would be advanced by the deviation, and*
- b. *The benefits of the deviation from the zoning ordinance requirements would substantially outweigh any detriment.*

The finding of the benefits must be for the specific property in question—it must be unique to the area. The zoning benefits resulting from permitting the deviation(s) must be for the community and not merely for the private purposes of the owner. It has been held that the zoning benefits resulting from permitting the deviation(s) are not restricted to those directly obtained from permitting the deviation(s) at issue; the benefits of permitting the deviation can be considered in light of benefits resulting from the entire development proposed. Notwithstanding the above, the Board should consider only those purposes of zoning that are actually implicated by the variance relief sought.

3. The Municipal Land Use Law (NJSA 40:55D-70) requires the applicant to satisfy *both* components of the negative criteria:

- a. *The proposal will not create a “substantial detriment to the public good”; and*
- b. *The proposal will not create a “substantial detriment to the zone plan and zoning ordinance.”*

D. Technical Engineering Review

1. The proposed 1-story rear addition does not conform with all the bulk requirements in the R-7 Single Family Residential Zone. The applicant shall provide testimony to justify the granting of the required bulk variances for the proposed addition.
2. The applicant shall confirm the new location of the existing shed on the plan or whether same will be completely removed from the property.



3. The applicant shall revise the plan to label the existing fence type surrounding the property and address the apparent encroachment of the existing fence onto the adjacent lots as to whether a signed agreement is in place with the affected adjacent property owners.
4. The applicant shall clarify/verify the requested combine side yard variance. The proposed combine side yard (27.8') appears to confirm with required setback (20'). The Zoning Data Table shall be revised accordingly.
5. Revise the Plan to depict the dimensions of the proposed rear addition.
6. The applicant shall revise the plan to delineate two (2) parked vehicles within the existing paved driveway to demonstrate the existing driveway can accommodate the two (2) parking spaces required for the property.
7. The plan shall be revised to include existing topography and/or spot grades to depict the existing drainage patterns on the property to demonstrate the proposed rear addition will not have any surface runoff impacts on the adjacent properties.
8. The plan shall be revised to clearly depict the roof downspout locations for the proposed rear addition. We recommend all gutters be pitched from back to front of building to downspouts installed at both ends of the building to daylight on splash guards towards the right-of-way of St. Johns Place.
9. The proposed development will not disturb an area exceeding 1 acre, nor will it create more than a quarter acre of new impervious surfaces. Therefore, the project is not considered a "major development" as defined by NJAC. 7:8, and is not subject to the NJDEP stormwater quantity, quality and recharge requirements of a major development.
10. The property is located within the "AE" flood zone with a Base Flood Elevation (BFE) of 11.0 feet. The applicant has provided an Elevation Certificate which appears to be acceptable. However, we defer further review of same to the Borough Flood Plain Administrator and Construction Official for any applicable building requirements that may be required.
11. The project site is in the Coastal Area Facilities Review Act (CAFRA) Zone. We note the project is not located within 150 feet of the mean high-water line of any tidal waters or the landward limit of a beach or dune; therefore, a CAFRA permit is not required. We defer further review to NJDEP.
12. The applicant shall provide construction details for the proposed rear deck and walkway
13. If approved, the applicant will be required to post all performance guarantees and inspection escrow as stipulated in the Development Regulations.

We reserve the opportunity to further review and comment on this application and all pertinent documentation, pursuant to testimony presented at the public hearing. If you have any questions or require additional information, please call.



Very truly yours,

T & M ASSOCIATES

LUCCE ZAMOR, APPLICATION REVIEWER

FRANCIS W. MULLAN, P.E., C.M.E.

BOROUGH OF KEANSBURG

PLANNING BOARD OF ADJUSTMENT ENGINEER

FWM:LZ

cc: Kevin Kennedy, Esq., Board Attorney, email: kennedylaw@verizon.net
Kathy Burgess, Zoning Officer, kathy.burgess@keansburg-nj.us
Shirley Eddings, Applicant/Owner
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