



Alaimo Group

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February 27, 2026

Chair Thomas, and Board Members
Evesham Township Zoning Board
984 Tuckerton Road
Marlton, New Jersey 08053

Re: Evesham Township Zoning Board
Target Corporation
Application #Z25-26
Proposed Storage Containers
751 Route 73 South
C1 – Commercial - 1
Block 36, Lot 4.08
Use Variance
Minor Site Plan
Planner's Report
Our File No: A-1398-0044-000

Dear Chair Thomas and Board Members:

We have reviewed the submission package and site plans for the referenced application and are familiar with the 28.76 acre site. The property is located along the south side of Route 73 across from the intersection with Ardsley Drive. A Target Store is situated on the subject property. The applicant is currently utilizing four (4) storage containers located in the front yard parking lot. The existing storage containers occupy eight (8) parking spaces. The plans show proposed striping in front of the storage containers that will delete an additional two (2) parking spaces. A proposed 8' high vinyl fence is proposed to screen the storage containers. Although outdoor storage is a permitted conditional use, continued outdoor storage in exceeding thirty (30) days and front yard outdoor storage is prohibited. Therefore, a use variance is required.

Variance Requests:

1. Section 160-68G of the Ordinance states that the use of outdoor areas for any type of storage is permitted as a conditional use and only in accordance with the standards in Chapter **161**, Zoning Modifications and Additional Requirements. The use of semitrailers, metal storage or shipping containers or temporary storage buildings for temporary storage or during a loading or unloading procedure, is permitted only in designated loading areas for no more than seven days, unless an application for approval of a zoning permit is approved. An approved permit shall be valid for no more than 30 days. **A use variance is required to permit the current outdoor storage use to continue.**

- Consulting Engineers -

Civil • Structural • Mechanical • Electrical • Environmental • Planners

2. Section 160-13D of the Ordinance states that an accessory building may be erected in side and rear yard areas and not in front yards. The existing storage containers are located in the front yard of the subject property. **A use variance is required.**
3. Section 161-1C(17) of the Ordinance lists the required conditions for Outdoor Storage of any kind as an accessory use of a nonresidential use. The following conditions are to be addressed. **A conditional use variance is required.**
 - a) Section 161-C(17)(a) of the Ordinance states outside storage shall be located no closer than 100 feet to any street, or, if located in a side yard area along a building, it must be behind the front half (based on the average building depth) of the building. The existing storage containers are located within 100' of the Route 73 right-of-way. **A conditional use variance is required.**
 - b) Section 161-C(17)(c) of the Ordinance states that materials stacked within an outside storage area shall not be stacked higher than the height of the screening material or eight feet, whichever is less. Testimony should be provided as to the height of the storage containers. **A conditional use variance is required.**

Our Comments:

4. The applicant is requesting a use variance related to MLUL 40:55D-70d. As the Zoning Board is well aware, these variance requests may be granted based on proofs presented by the applicant, with determination that the proofs are met. The applicant must convince the Board of **all** of the following:
 - a. There are “special reasons” why the use should be permitted in a zone where it is not allowed under the Ordinance. The elements of “special reasons” are:
 - The proposed project carries out a purpose of the Zoning; or
 - Refusal to allow the project would impose on the applicant an undue hardship.
 - b. The proposed site is particularly suited for the proposed use.
 - c. An “enhanced quality of proof”
 - The variance being requested will not be inconsistent with the intent and purpose of the Master Plan and Zoning Ordinance.
 - There is a valid reason why the variance should be granted despite the fact that it is not permitted under the Zoning Ordinance.
 - d. An applicant for a “use variance” must also satisfy the “negative criteria”:

- If the variance is granted there will not be a substantial detriment to the public good; and
 - The granting of the variance will not substantially impair the intent and purpose of the Zone Plan and Zone Ordinance.
5. The applicant does not meet all of the conditions required for Outdoor Storage use under Section 161-61C(17). **The applicant requires a conditional use variance related to MLUL 40:55D-70d(3).** In *Coventry Square, Inc. v. Westwood Zoning Bd. of Adjustment*, 138 N.J. 285 (1994), the court determined that the burden of proof required for a use variance was too onerous for a conditional use variance and fixed a less stringent standard of proof for conditional use variance relief cases. That standard of proof will:
- a. Focus both the applicant's and the board's attention on the specific deviations from conditions imposed by the ordinance; and
 - b. Permit the board to find special reasons to support the variance only if it is persuaded that the non-compliance with conditions does not affect the suitability of the site for the conditional use.

Thus, a conditional-use variance applicant must show that the site will accommodate the problems associated with the use even though the proposal does not comply with the conditions the ordinance established to address those problems.

6. Applicant to provide testimony to following:
- a. Need for the storage containers
 - b. Frequency of loading and unloading, and time of day
 - c. Methods of unloading and loading
 - d. Location where materials are brought into store
 - e. Security of the containers
 - f. Type of materials stored in the containers
 - g. Storage container capacity
 - h. Lighting at storage container area
 - i. Pedestrian safety in the area

7. Applicant should provide an operations statement to the Board, Township, and staff.
8. The Zoning Summary Chart on sheet 1 of the revised site plan dated January 23, 2026 notes that a previously approved parking variance permitted 432 spaces where 570 spaces were required. The chart also notes that there are 454 existing spaces. The existing storage trailers and proposed striping will further reduce the existing parking deficit by 10 spaces for a total of 444 proposed parking spaces. Documentation should be provided regarding the prior parking variance. Testimony should be provided indicating that the further reduction in parking spaces will not adversely affect the current and anticipated parking demand for the Target Store.
9. Section 8 of the submitted Land Development Form indicates that there are 432 existing parking spaces and 422 proposed parking spaces. These figures conflict with the information shown on The Zoning Summary Chart on sheet 1 of the revised site plan dated January 23, 2026. However, the information shown on The Zoning Summary Chart on sheet 1 of the site plan dated August 15, 2025 is consistent with the Land Development Form. This discrepancy should be addressed. **A parking variance will be required if 422 spaces are proposed.**
10. The proposed 8' high vinyl fence and proposed landscaping conflicts with existing landscaping in the vicinity of the storage containers. The plan should be revised to show the existing plantings to be removed where the fence and new plantings are to be installed. Applicant to coordinate any landscaping adjustments with our office.
11. The Zoning Summary Chart notes an existing lot width of 1,147.0 feet and a proposed lot width of 929.9 feet. The proposed lot width reduction should be explained.
12. Applicant to provide a detail of the proposed storage containers.
13. We recommend as a condition of any approval that the resolution contain specific language as to the number and location of the proposed storage containers.

Should you need additional information, please contact us.

Sincerely,

ALAIMO GROUP



Richard Hunt, PP, AICP
Senior Project Manager

RH/DV

- c: Evesham Township Zoning Board Members
Kevin Rijs, Director of Community Development
Matt Wieliczko, Esq., Board Solicitor
Jennifer Newton, Administrative Officer/Board Secretary, Evesham Township
Rakesh Darji, PE, PP, CME, Board Engineer
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