



THE COUNTY OF CHESTER



COMMISSIONERS
Terence Farrell
Kathi Cozzone
Michelle Kichline

Brian N. O'Leary, AICP
Executive Director

PLANNING COMMISSION
Government Services Center, Suite 270
601 Westtown Road
P. O. Box 2747
West Chester, PA 19380-0990
(610) 344-6285 Fax (610) 344-6515

December 7, 2016

Chris Patriarca, AICP, Director of Planning and Zoning
Westtown Township
P.O. Box 79
Westtown, PA 19395

Re: Conditional Use - Crebilly Farm
CU-11-16-14546 - Westtown Township

Dear Mr. Patriarca:

A Conditional Use Plan entitled "Crebilly Farm, Plan A/Proposed Development", prepared by ESE Consultants Inc., and dated October 7, 2016, was received by this office on November 10, 2016. Although our review is not required by Act 247, the Pennsylvania Municipalities Planning Code, our comments are offered as a courtesy review at the request of Westtown Township. This review compares the conditional use to the requirements set forth by your zoning ordinance and to County policies and considers the proposed land use as it relates to the conditional use application. This review does not replace the need for an official referral by Westtown Township of a preliminary or final subdivision or land development plan, as required by the Pennsylvania Municipalities Planning Code.

PROJECT SUMMARY:

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|---|--|
| <u>Location:</u> | west side of Route 202, between Street Road (Route 926) and West Pleasant Grove Road |
| <u>Site Acreage:</u> | 322.36 |
| <u>UPI#:</u> | 67-4-29.1, 67-4-30, 67-4-29.3, 67-4-29.4, 67-4-32, 67-4-134, 67-4-31, 67-4-29, 67-4-33, 67-4-29.2, 67-4-33.1 |
| <u>Lots/Units:</u> | 319 |
| <u>Existing Land Use:</u> | Agricultural and Residential |
| <u>Proposed Land Use:</u> | Single Family Residential, Townhouse |
| <u>Zoning District:</u> | A/C Agricultural/Cluster and R-1 Residential |
| <u>Municipal Land Use Plan Designation:</u> | Agricultural/Cluster Residential/Office Option, and Private/Semi-Public Open Space |
| <u>Landscapes2 Designation:</u> | Suburban, Rural and Natural Landscapes |
| <u>Watershed Designation:</u> | Radley Run subbasin of the Brandywine Creek watershed, and the Chester Creek Watershed |

PROPOSAL:

The applicant proposes the creation of 319 residential lots (202 single-family residential and 117 townhouse lots), and 197.2 acres of open space. There are existing residences on Lots A and B. The project site, which will be served by public water and onsite (community) sewer, is located in the A/C Agricultural/Cluster and R-1 Residential zoning districts. The site is being developed under the Flexible

Development Procedure Requirements set forth in Article IX of the Township Zoning Ordinance, which requires conditional use approval in the A/C zoning district.

While we acknowledge that Page 1 of the Transportation Impact Study identifies three potential alternatives for this development, our review of "Crebilly Farm, Plan A/Proposed Development" does not include a review of Alternatives B and C identified in the Study, which were not included with the conditional use application received by the Commission on November 10, 2016.

RECOMMENDATION: The County Planning Commission recommends that Westtown Township not grant conditional use approval until it has verified the application fully complies with the Flexible Development and Conservation Design provisions in the Township Zoning Ordinance. Additionally, the applicant and Township should consider a revised site plan in which the proposed development activity is located, to the greatest extent possible, on the eastern portion of the site in accord with the site design, historic preservation, and access and circulation recommendations identified in this review.

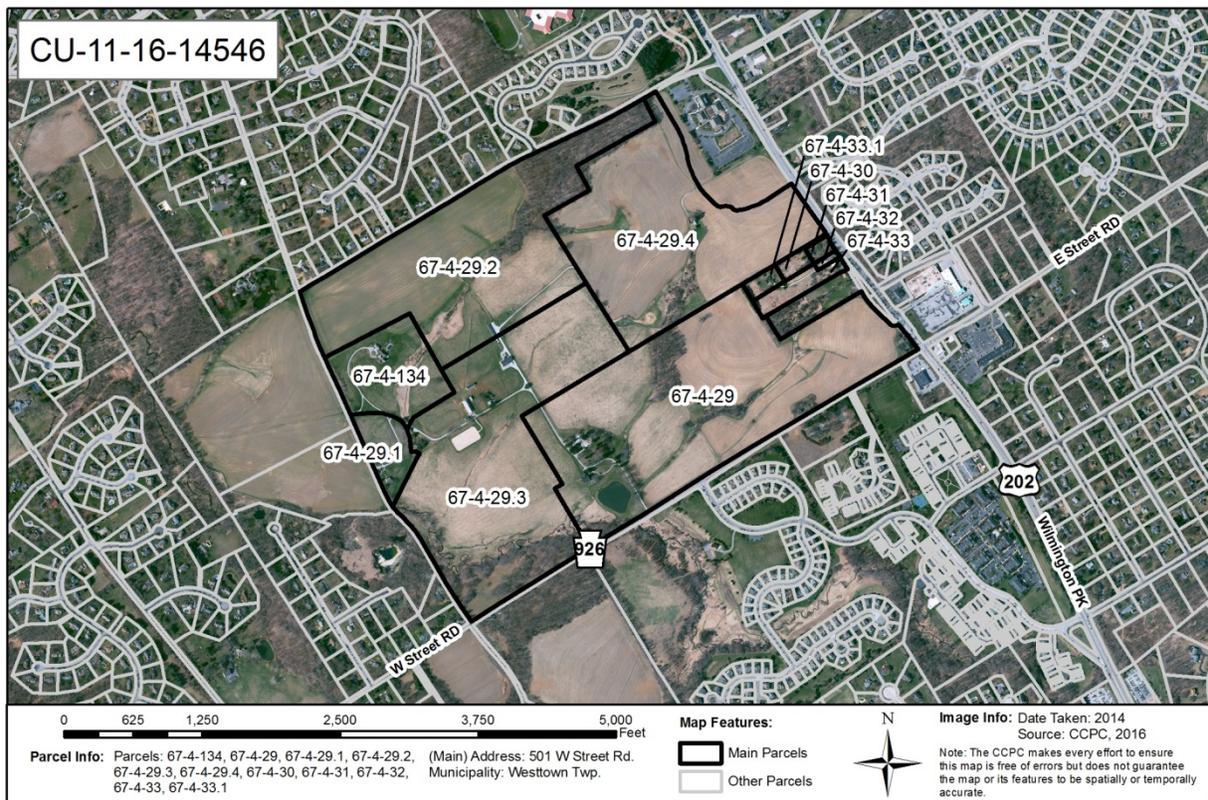


Figure 1: Location Map: Site of Crebilly Farm Conditional Use Application

LANDSCAPES:

1. While the eastern portion of the project site is located within the **Suburban Landscape** designations of *Landscapes2*, the 2009 County Comprehensive Plan, the central and western portions of the site are located in the **Rural Landscape** and **Brandywine Battlefield Overlay** designations; additionally, the **Natural Landscape** designation extends across the entire tract. The objective of the **Suburban Landscape** is to promote new development to accommodate anticipated population and employment growth, using appropriate density, sustainable design, and smart transportation principles. The objective of the **Rural Landscape** is to preserve the open, rural character of Chester County, enhance villages within their historic settings, and

accommodate appropriate developments in rural centers. As an overlay of the basic landscapes, the objective of the **Natural Landscape** is to encourage the preservation and restoration of sensitive natural resources. **Landscapes2** also recognizes the **Brandywine Battlefield**, the largest engagement of the Revolutionary War, as an overlay area on the Livable Landscapes Map. The **Landscapes2** Vision for the Brandywine Battlefield recommends that “adjacent development will use context-sensitive design to integrate development and open space with these resources.”

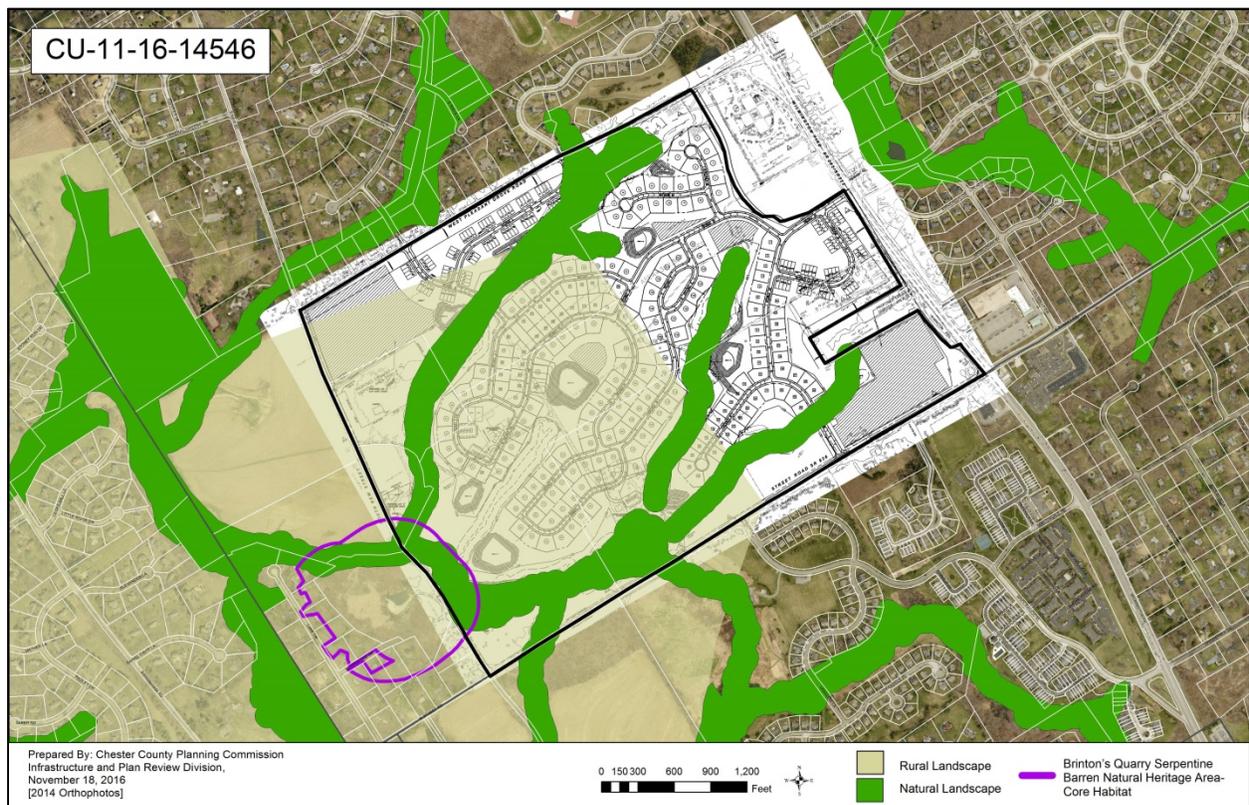


Figure 2: Crebilly Farm Conditional Use Application: Sheet 3-Overall Lot Layout, depicted with location of Rural Landscape and Natural Landscape designations, and the core habitat of the Brinton's Quarry Serpentine Barren Natural Heritage Area

While single-family and multi-family residential development is appropriate for a **Suburban Landscape** designation, the proposed residential development on the western portion of the site is not consistent with the goals and objectives of the **Rural Landscape** designation nor is it consistent with the historic resource and context preservation policies of **Landscapes2**. In order for the proposed development of the Crebilly Farm tract to be generally consistent with **Landscapes2**, the applicant and Township should consider the development of a revised site plan in which the proposed development activity is located, to the greatest extent possible, on the eastern portion of the site (this issue is further discussed in comment #4).

BACKGROUND:

2. The County Planning Commission previously reviewed a conditional use application for the construction of a 260-unit apartment complex and 493 parking spaces on an 18.12 acre portion of the Crebilly Farm tract along the west side of Route 202 (CCPC# CU-12-13-9046, dated January 3, 2014). It is our understanding that this prior submission was withdrawn by the applicant.

PRIMARY ISSUES:

Conditional Use Application:

3. Westtown Township should not grant conditional use approval until it has verified the application fully complies with the Flexible Development provisions in Article IX of the Township Zoning Ordinance, along with the applicable requirements in Section 170-1617, Conservation Design.

While Section 170-1617.C(1)(c) states that locations and descriptions of existing buildings, with a description of any historic architectural significance of each building if any is required, this information is not provided as part of the current submission to the County Planning Commission. The Township's 2016 Historic Resources Map identifies three historic resources on the project site. The Westtown Inn (aka Darlington Corners Inn, built circa 1820) at the northwest corner of Route 202 and Route 926 is eligible for the National Register of Historic Places, and the "Crebilly Farm" estate on UPI# 67-4-29 and the estate on UPI# 67-4-29.1 are identified as historic resources "of local historic value."

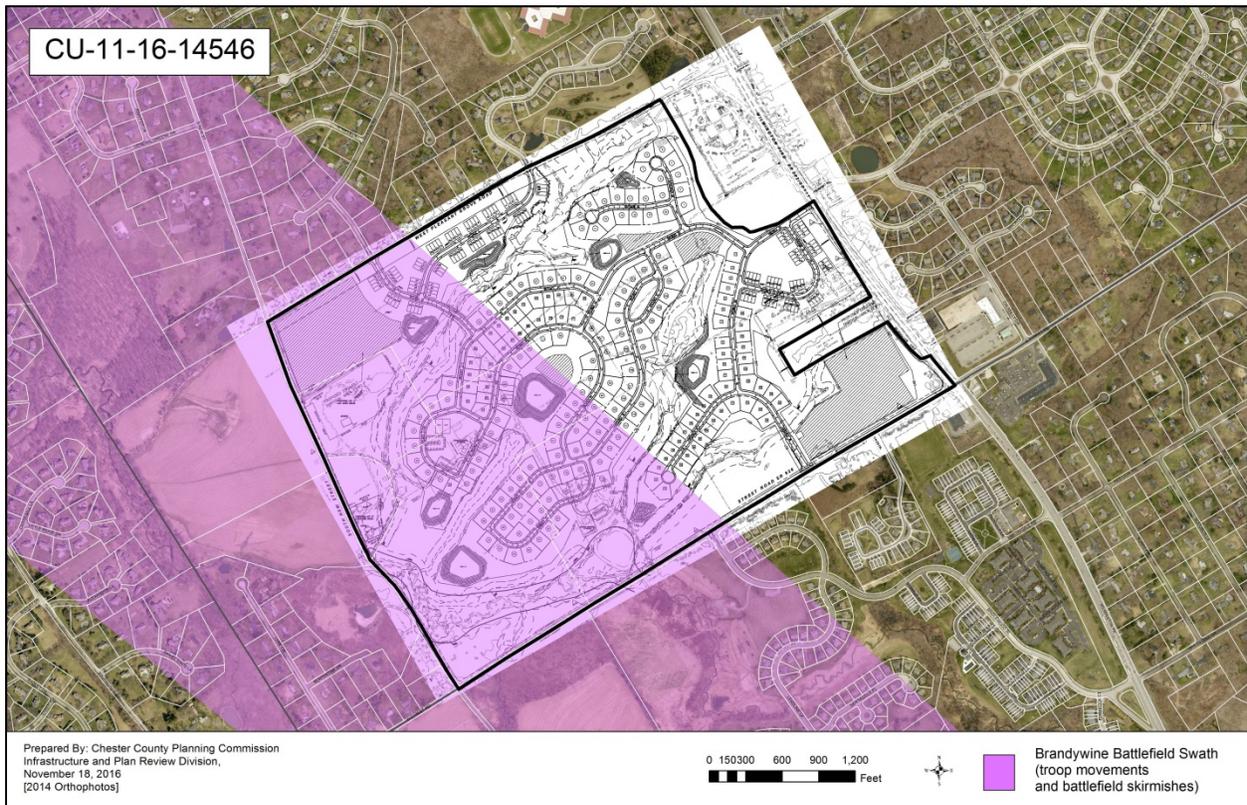


Figure 3: Crebilly Farm Conditional Use Application: Sheet 3-Overall Lot Layout, depicted with location of Brandywine Battlefield Swath (troop movements and battlefield skirmishes)

Additionally, the application received by the Commission did not include a "Potential development areas concept map" as required by Section 170-1617.C(2); this section states that land development activities and associated land disturbance shall not be permitted in primary conservation areas or within more than 50 percent of "secondary conservation areas", defined in Section 170-1617.C(1)(c) as areas of woodlands, tree lines, large specimen trees over 18 inches in trunk diameter, scenic views from inside the site, ridgelines, and scenic views from existing streets and trails. The location of primary and secondary conservation areas should be provided on the potential development areas

concept map, as required by the Township Zoning Ordinance. The County Planning Commission supports the preservation of scenic viewsheds, in this specific instance the scenic views from West Pleasant Grove Road, New Street and Route 926.

Site Design/Historic Preservation:

4. The County Planning Commission recommends that the applicant and Township consider the development of a revised site plan in which the proposed development activity is located, to the greatest extent possible, on the eastern portion of the site outside of the **Rural Landscape** designation (as shown in Figure 2, page 3) and the Brandywine Battlefield area (as shown in Figure 3, page 4).

Consideration should be provided by the applicant for providing more townhouse lots and fewer single-family lots in order to cluster development on the eastern portion of the site. Figure 4 below, which is a modification of the applicant's Plan "B" alternative, provides a conceptual illustration of how development activity on the Crebilly Farm tract can be located outside of the majority of the Rural Landscape and Brandywine Battlefield area. The County Planning Commission would be happy to work with the applicant and the Township on alternative sketch plans of the site that have a higher proportion of townhouses, along with more open space provided on the portion of the tract located in the Rural Landscape.

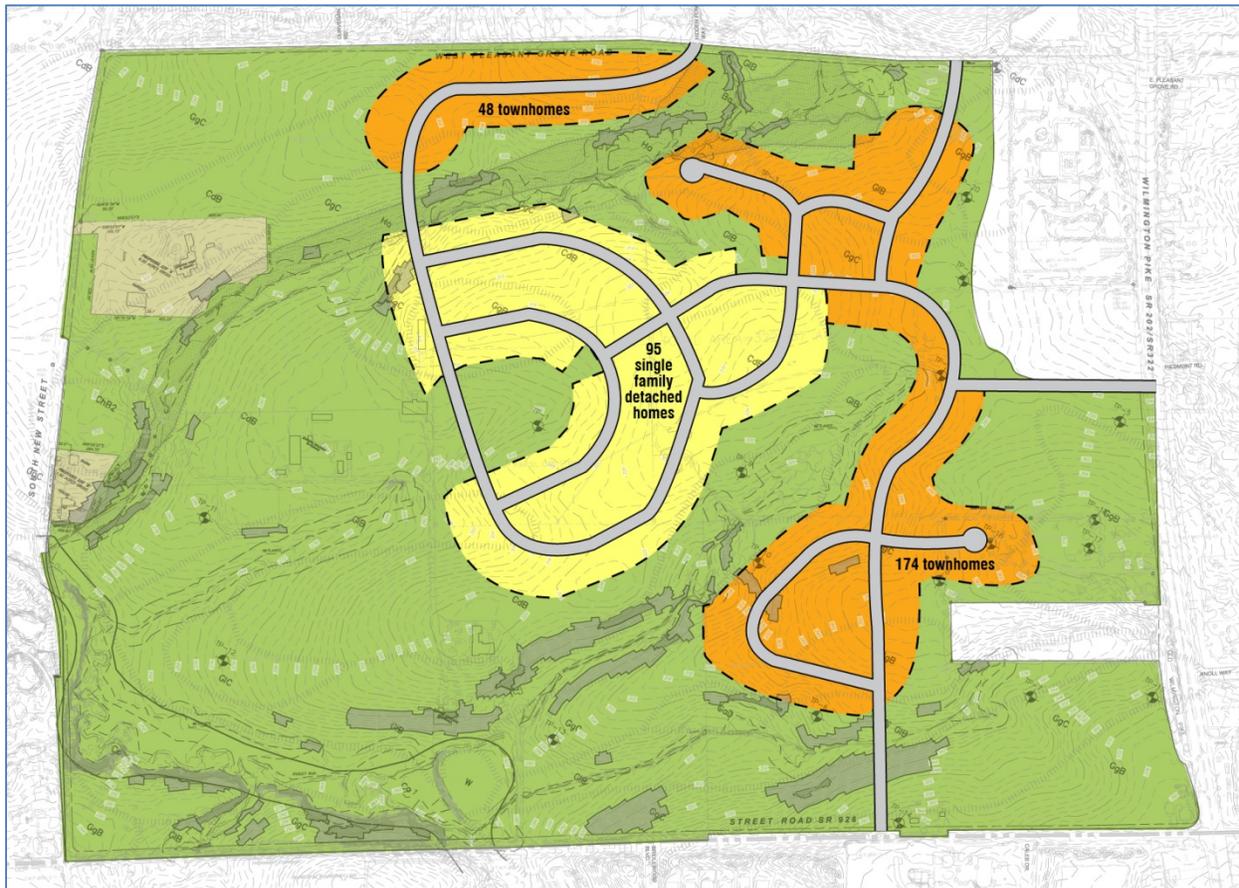


Figure 4: Conceptual Development of Crebilly Farm tract

5. The Commission recommends that an architectural historian conduct an architectural survey and assessment of the entire tract, with consideration provided by the applicant and Township for the preservation of all historic/cultural resources identified in the survey as part of the revised site design. The historic resource and context preservation objective of *Landscapes2* is to preserve historic and cultural resources and their appropriate settings (Objective HR2, page 112).
6. The applicant and Township should investigate the feasibility of moving the Westtown Inn further from the Route 202/Route 926 intersection in order to allow future improvements to this intersection while preserving this historic resource (this issue is further discussed in comment #10).
7. The October 17, 2016 cover letter from the applicant's engineer states that several existing barns/buildings will be converted into community centers with yet to be determined outdoor recreation facilities. The applicant and Township should clearly specify the recreation facilities that will be provided for this development. Recommendation Item G2-ST2 on page 65 of the Township's 2014 Open Space, Recreation and Environmental Resources Plan Update states the Township should "ensure the dedication of open space, including unconstrained lands suitable for playing fields, as the Crebilly Farm development proceeds."
8. The applicant should clearly identify how access will be provided to all proposed open space areas, for both the use of residents and for maintenance purposes. In general, the applicant should strive to provide access to the open space from each area or neighborhood within the development, without the need for users to travel significant distances or cross an excessive number of streets. The open space portions of the site should be conserved via easements.
9. If conservation is an option, the County would be happy to work with the applicant, Township and conservancies to preserve this property.

Access and Circulation:

10. Vehicular access to the site is proposed to be provided via two full-movement streets on West Pleasant Grove Road, a right-in/right-out street on Route 202, and a full movement street (Road A) on Route 926. The Conclusions and Recommendations section of the Traffic Impact Study, prepared by McMahan Associates, Inc., and dated October 13, 2016, states the proposed Road A/Route 926 intersection will be signalized. The Study also recommends signal optimization for the existing traffic signal at the Route 926/New Street intersection. Both the Township Engineer and PennDOT should review the findings in the Traffic Study. In particular, the Township should examine the impacts the additional traffic will have upon the existing residences along West Pleasant Grove Road, along with determining whether any additional off-site improvements will be required, particularly the Route 202/Route 926 intersection (the Route 926/New Street signal optimization is the only off-site improvement identified in the traffic study).

It could be advantageous to the Township for the improvements to the Route 202/Route 926 intersection identified in the FY 2017 Transportation Improvement Program for Pennsylvania to be completed as part of this project, in conjunction with the relocation of the Westtown Inn. These improvements include the installation of an additional southbound Route 202 deceleration lane and an additional eastbound Route 926 left turn lane onto Route 202. Additionally, consideration should be provided for developing a coordinated signal system for the proposed Road A/Route 926 intersection and other existing signals along Route 926 in the immediate vicinity of the project site.

11. The Commission recommends that the applicant and Township, as part of the revised site design discussed in comment #4, consider providing a connector road from Pleasant Grove Road to Route

926, as shown on the Land Use Plan map in the Township's 2001 Comprehensive Plan, along with developing a more straight-forward interconnected internal road system. From a traffic standpoint, it may be worthwhile for the applicant to construct the proposed off-site road connection from Pleasant Grove Road to the Skiles Boulevard interchange.

12. The site plan does not indicate the location of any pedestrian facilities. This should be clarified by the applicant. In addition to sidewalks being an essential design element in the **Suburban Landscape**, the Trails Plan map in the Township's 2001 Comprehensive Plan depicts the location of a proposed trail corridor around the perimeter of the Crebilly Farm tract, with trail connections to the adjoining parcels to the north and to the west. The Township's 2014 Open Space, Recreation and Environmental Resources Plan Update (page 19) states this trail "would be a much needed amenity for the western end of the Township." Additionally, direct pedestrian access (including trail connections within open space areas) should be provided to the proposed recreation facilities. The applicant and Township should refer to the Pedestrian Facilities Design Element of the Chester County Multi-Modal Circulation Handbook in its design of pedestrian facilities for this development, which is available online at: www.landscapes2.org/transportation/circulation/02-PedFacs.cfm.
13. While the site plan depicts the location of two emergency access connections (one onto Street Road west of the proposed signalized Road A/Route 926 intersection, and one onto South New Street), no design details for these emergency connections are provided. This should be clarified by the applicant. We recommend the applicant and Township refer to the Emergency Access design element of the Commission's Multimodal Circulation Handbook in its design of emergency access connections, which is available online at: <http://www.landscapes2.org/transportation/circulation/09-EmergAccess.cfm>.

Natural Features Protection:

14. The 2015 Chester County Natural Heritage Inventory, which is available online at <http://www.landscapes2.org/psd/Natural/inventories.cfm>, indicates that the southwest corner of the project site is located within the core habitat of the Brinton's Quarry Serpentine Barren Natural Heritage Area (NHA) included in the Pennsylvania Natural Diversity Index (PNDI), which hosts five plant species of concern (the location of this NHA is also shown in Figure 2 on page 3). Development on this portion of the site could be detrimental to the NHA species population, if they exist on the site. We recommend that the applicant and Township contact the PA Department of Conservation and Natural Resources, Pennsylvania Natural Heritage Program (<http://www.naturalheritage.state.pa.us> or RA-HeritageReview@pa.gov) for further information on this matter.
15. The site plan depicts that development activity will occur in existing steep slope areas. The Township should verify that the design of the slopes is consistent with all applicable ordinance requirements in Section 170-402 of the Township Zoning Ordinance ("Steep Slope Conservation District") related to permitted grades, the design and specifications of retaining walls and slope stabilization.
16. The site contains land within the 100 year flood plain. Although it does not appear that any development activity will encroach into the 100-year floodplain, the applicant and the Township should also be aware that FEMA has issued new preliminary floodplain mapping, which FEMA anticipates will become effective in August 2017. Further information on this matter, including links to interactive online FEMA mapping, is currently available at: <http://www.chesco.org/158/Water-Resources-Authority>.

Page: 8
Re: Conditional Use - Crebilly Farm
CU-11-16-14546 - Westtown Township

The site also contains wetlands and hydric soil areas. The applicant should contact the U.S. Army Corps of Engineers and Pennsylvania Department of Environmental Protection to determine if the proposed development activity will require a wetlands permit. On-site alterations to existing drainage patterns should be carefully inspected by the Township Engineer to insure that off-site drainage conditions are not negatively affected.

Agricultural Security Areas:

17. Four of the parcels which comprise the project site (UPI# 67-4-29.2, 67-4-29.3, 67-4-29.4, 67-4-29) are located within an agricultural security area adopted by the Township in accordance with the Agricultural Security Area Act (Act 43). Adoption of an agricultural security area is a public policy statement for the preservation of agriculture. The Township should consider how designation of agricultural security areas relates to its current zoning ordinance.

We appreciate the opportunity to comment on this proposal. Approval of this conditional use does not imply approval of the proposed subdivision plan, nor release the requirement of the applicant to submit a subdivision plan under other Township ordinances and the Pennsylvania Municipalities Planning Code.

Sincerely,



Paul Farkas
Senior Review Planner

cc: Toll PA XVIII, L.P.
ESE Consultants Inc.
Crebilly Farm Associates LP
Teresa DeStefano, Planning Commission Secretary, Thornbury Township
Matthew Miele, District Permits Manager, PennDOT
Francis J. Hanney, P.E., PennDOT