



December 9, 2016

Mr. Chris Patriarca, Planning and Zoning Administrator  
Westtown Township  
1039 Wilmington Pike  
West Chester, PA 19382

**RE: Crebilly Farm – Plan A / Proposed Development  
Conditional Use Application – Review 1 (Plans Dated 10-07-2016)  
Address: West Chester Pike and West Street Road, West Chester, PA 19382  
Record Owner: Crebilly Farm Family Associates, LP  
Applicant: Toll PA XVIII, L.P.  
Zoning: Agricultural/Cluster Residential (A/C) and Residential District (R-1)  
TPN/UIP: 67-4-30, 67-4-31, 67-4-32, 67-4-33, 67-4-33.1, 67-4-134, 67-4-29, 67-4-29.1,  
67-4-29.2, 67-4-29.3, and 67-4-29.4  
MT No.: 5675.16**

Dear Mr. Patriarca:

We are in receipt of the following information submitted on behalf of the applicant, Toll PA XVIII, L.P.:

- 1) *Conditional Use Subdivision Plan for Crebilly Farm Plan A / Proposed Development*, sheets 1 to 45, prepared by ESE Consultants, Inc., dated October 7, 2016;
- 2) *Conditional Use Application Addendum*, signed by Gregg Adelman, Esq. Kaplin, Stewart, Meloff Reiter & Stein, P.C.;
- 3) *Exhibit A: Conditional Use Subdivision Plan for Crebilly Farm Plan A / Proposed Development*, sheets 1 to 45 (half size), prepared by ESE Consultants, Inc., dated October 7, 2016;
- 4) *Exhibit B: Aqua Will Serve Letter and corresponding email*, dated October 23, 2013, last revised June 21, 2016;
- 5) *Exhibit C: On-Site Wastewater Feasibility Letter*, prepared by Geo-Technology Associates, Inc., dated October 11, 2016;
- 6) *Exhibit D: West Goshen Sewer Authority Capacity Availability Letter*, prepared by Carroll Engineering Corporation, dated September 19, 2016;
- 7) *Exhibit E: Stormwater Management Narrative for Crebilly Farm*, prepared by ESE Consultants, Inc., dated October 2016;
- 8) *Exhibit F: Preliminary Geotechnical Exploration Report*, prepared by Geo-Technology Associates, Inc., dated August 11, 2016;
- 9) *Exhibit G: Fiscal Impact Analysis*, prepared by David C. Babbitt & Associates, LLC, dated October 13, 2016;
- 10) *Exhibit H: Transportation Impact Study*, prepared by McMahon Associates, Inc., dated October 13, 2016;



- 11) *Exhibit I: Crebilly Farm Plan A - Alternative Proposed 30 Foot Spacing Development Sheet 45 of 45*, prepared by ESE Consultants, Inc., dated October 7, 2016;
- 12) *Exhibit J: Crebilly Farm Plan B - Proposed Density Bonus Development, Sheet 1 of 1*, prepared by ESE Consultants, Inc., dated October 7, 2016.

## **PROJECT OVERVIEW**

The applicant is proposing to consolidate eleven (11) parcels, approximately 322.36 acres, and construct 317 homes with two (2) existing homes to remain (200 single-family and 117 carriage) in the Agricultural/Cluster Residential (A/C) and Residential (R-1) Districts. Associated improvements area also proposed with this proposal. The development will be accessible by four (4) proposed accesses from West Pleasant Grove Road, Wilmington – West Chester Pike (S.R. 202) and Street Road (S.R. 926).

## **PURPOSE**

The purpose of this review is to determine if this application addresses the requirements for Conditional Use approval as outlined in the Westtown Township Zoning Ordinance – Chapter 170, including but not limited to **§170-502 (Agricultural/Cluster Residential District)**, **§170-602 (R-1 Residential District)**, **§170-900 (Flexible Development Procedure)**, and **§170-2009 (Conditional Uses)**.

## **ZONING**

1. **§170-904.E.1.a** – The maximum net residential density for permitted multifamily areas within the Flexible Development shall not exceed 10 dwelling units per acre of tract area designated for such use. The applicant shall provide a table depicting the density calculation for the proposed townhouses.
2. **§170-904.E.1.c** – The maximum net residential density for permitted single-family detached areas within the Flexible Development shall not exceed four (4) units per acre of tract area designated for such use. The applicant shall provide a table depicting the density calculation for the proposed single-family dwelling units.
3. **§170-904.E.1.d** – The acreage set aside for common open space rights-of-way of public streets shall not be used for computation of net residential density for any residential use.
4. **§170-904.E.2.c** – Not more than 45% of the gross area of the tract shall be covered by impervious surfaces.
5. **§170-904.E.2.d.2.b** – Parking for each dwelling unit shall be provided either at the rear of the unit or shall be grouped into one or more parking areas serving a number of dwelling units.
6. **§170-904.E.5** – To create architectural interest in the layout and character of housing fronting streets, variations in building line shall be encouraged.
7. **§170-904.E.7** – Building height shall be limited to three stories not to exceed 38 feet.
8. **§170-904.E.10.a** – No structure shall be within 30 feet of the curb of access roads.
9. **§170-905.A.1.j** – As part of the application for conditional use approval of any flexible development, the applicant shall prepare and submit to the Township a site analysis which identifies the historic resources, including structures, ruins, sites, traces, and relationship to

the bounds of any National Register historic district.

10. **§170-905.A.3** – The applicant has provided a Stormwater Management Narrative (Feasibility Report) for the proposed project. Although the stormwater system proposed demonstrates the ability to provide stormwater management, we caution that the system may warrant reconsideration during the land development process to incorporate a more multi-structured system of stormwater management by adopting more non-structural and structural design concepts as outlined in the PA Best Management Practices Manual.
11. **§170-905.A.3** – The Stormwater Management Narrative (Feasibility Report) references the Darby-Crum Creek Watershed. The Act 167 Plan for Westtown in this area contains drainage areas to the Brandywine Creek (noted in the report) and the overlay of Chester Creek Watershed’s drainage panels 32 and 33. Development in the Chester Creek watershed must comply with the 50% reduction standards outlined in the Act 167 Plan.
12. **§170-905.A.3** – Although the stormwater planning is generally conceptual, a more detailed plan for the area of the townhouses along Route 202 must be provided.
13. **§170-905.A.3** – In the conditional use phase of this project, the feasibility of access to each of the basins must be demonstrated. If additional open space areas or easements are required, they should be added to the plan prior to the full subdivision-land development application.
14. **§170-905.A.5** – An erosion and sedimentation control plan shall be filed and implemented in accordance with the regulations of the Pennsylvania Department of Environmental Protection and the requirements of Chapter 149, Subdivision and Land Development.
15. **§170-905.D** – Signs, as required by Article XVIII. The applicant should indicate if a sign is being proposed and provide all associated information on the plan.
16. **§170-905.E** – Lighting, as required by **§170-1514**. The applicant should provide a lighting plan for review with the next submission.
17. **§170-905.G** – Screening, as required by **§170-1508**. The applicant should be in conformance with this section.
18. **§170-907.A.2** – Within the required acreage of open space, or elsewhere on the tract, an area equivalent to at least 10% of the net tract acreage shall be suitable and available to serve the particular recreational needs of the residents of the development. The Board may require that all, or a portion of, this recreational area be suitable for active recreation, and may further require that such area be prepared and developed for such purposes.
19. **§170-907.A.3** – Where applicable or deemed appropriate or contained in the Township's Comprehensive Plan or Parks, Recreation and Open Space Plan, provision for pedestrian trails for public and/or private use shall be provided. This provision need not be in addition to the 10% requirement of Subsection A(2) above unless the Board determines that the entire 10% minimum must be designated for active recreation.
20. **§170-907.A.7.b** – The area of common open space shall be interconnected with common open space areas on abutting parcels wherever possible, including provisions for pedestrian pathways for general public use to create linked pathway systems within the Township.
21. **§170-907.A.7.g** – The area of common open space shall be made subject to such agreement with the Township and such deed restrictions, duly recorded in the office of the Chester County Recorder of Deeds, as may be required by the Board of Supervisors for the purpose of preserving the common open space for such use.

22. **§170-908.A** – The developer shall provide to the Township a description of the organization, including its bylaws and documents governing common open space maintenance and use restrictions.
23. **§170-1507.C** – There shall be no plantings, ground cover or other objects placed within the road right-of-way above 18 inches in height.
24. **§170-1617.C.1.a** – The wetlands shall be based upon a professional analysis, with identification of the individual who completed such analysis in accordance with § 170-401B of this chapter. The applicant shall provide the curriculum vitae of the proposed wetland consultant.
25. **§170-1617.C.4** – An efficient street layout shall be designed to serve the appropriate building sites. Trails should also be considered to link together common open spaces such as the existing Thornbury Trail, clusters of homes and other destinations (i.e. nearby stores, parks and schools). Building sites should be clustered together to minimize expensive wetland and creek crossings by roads.
26. **§170-1705.A.3** – Townhouses, apartments, and similar multifamily dwellings shall provide 2.5 parking spaces per dwelling unit, 0.5 spaces of which may be located in convenient overflow areas for guests. The applicant has not provided a location for overflow parking for the proposed townhouses.
27. **170-2009.B.6.e** – Strong consideration shall be given to incorporation of LEED (Leadership in Energy and Environmental Design) certified building design principals recommended by the US Green Building Council.
28. **§170-2009.D.1.b** – The proposal shall be consistent with the Township Comprehensive Plan and with the purpose of this chapter to promote the public health, safety, and general welfare.
29. **§170-2009.D.1.f** – The demand created by the proposed use upon public services and facilities such as water supply, sewage disposal, police and fire protection, emergency services, open space and recreation facilities, and the public school system has been considered and, where necessary, adequate arrangements for expansion or improvement are assured.

### **GENERAL COMMENTS**

30. The applicant shall provide background information and assumptions for the preparation of the Existing Conditions Plan which resulted in the “net” tract area, specifically:
  - a. Has the applicant submitted the outbound deed and legal descriptions for the tract?
  - b. Were the floodplains areas “Zone X” of Tributaries 2 and 3 of Radley Run subtracted from the gross tract area to develop the net tract area? An interpretation from the Solicitor or Special Counsel may be required if these areas are “Floodplain.”
  - c. Were the floodplain boundaries mapped directly from the FEMA maps, or were they adjusted to the field survey prepared by ESE?
  - d. Were the wetlands confirmed in the field by the Army Corp of Engineers for accuracy and validity? When was the wetland survey and subsequent survey by a Professional Land Surveyor performed?
  - e. Were the steep slope area delineations performed by computer aided software or by draftsman interpretation?



- f. Was the overall topographic survey for the site performed via aerial or land survey?
31. The applicant should consider redesigning the system of roads to continue fluidity and connectivity throughout the development and reduce the use of cul-de-sacs.
  32. To continue the integrity of the existing road, improvements to South New Street and West Pleasant Grove Road shall be required during the development.
  33. The applicant shall coordinate with the Township Engineer during land development to select the vegetation and landscaping that will best assist the Township to reach the goals and requirements of the PADEP MS4 Program. Such provisions will address concerns regarding water quality such as phosphorous reduction in the watersheds.
  34. The applicant should revise the plans to provide a table of all proposed items to be offered for dedication to the Township and all items to be owned and maintained by the proposed homeowners association.
  35. The applicant should revise the plans to provide the total mileage as well as future ownership and maintenance responsibilities of the proposed roadways.
  36. The applicant should revise the plans to provide cross-sections for the proposed roadways.
  37. The applicant should revise the layout of the proposed Amenity Center, pool and tennis courts to consolidate the accesses and provide an improved flow of the area.
  38. The applicant should verify with the Township the status of approval of the lot consolidation application for parcels 67-4-30, 67-4-31, 67-4-32, 67-4-33 and 67-4-33.1.
  39. The applicant should ensure the total number of dwellings is consistent throughout the application (i.e. plans, stormwater report, addendum).
  40. The applicant should provide proposed scenic view renderings situated from the Westminster Presbyterian Church and Moscharis Vasilios locations.
  41. The applicant should indicate on the plans if the project intends to be developed in stages or constructed in one phase.
  42. The applicant must address all concerns expressed by the Police Chief.
  43. The applicant must address all concerns expressed by the West Chester Fire Chief.
  44. Although not specifically cited in the Township ordinance, the applicant should consider offering area and bulk restrictions for each individual lot to prevent future undesirable building or accessory use layouts from potential site improvements (i.e., building renovations, additions or accessory buildings).
  45. Although not specifically cited in the Township ordinance, the applicant should consider offering caps in percentage form for the impervious coverages of the individual lots. This would preserve the “green area” of the future lots, and help to preserve the aesthetics and character of the development. At a minimum, the applicant should consider a design caps on impervious coverage beyond which a future homeowner may have to provided individual stormwater attenuation on his/her lot.
  46. The applicant must acknowledge that every effort will be made to balance the cuts and fills at the site, to avoid the unnecessary import or export of soils during construction.

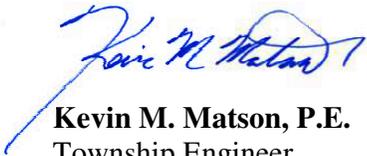


47. The water availability letter provided should be updated to reflect the new project being proposed on the site.

I trust that the foregoing will assist Westtown Township in their evaluation of the Conditional Use Application for Crebilly Farms.

As always, feel free to contact me directly with questions or concerns by phone at 610-640-3500 or by email at [kmmatson@mccormicktaylor.com](mailto:kmmatson@mccormicktaylor.com).

Regards,

A handwritten signature in blue ink that reads "Kevin M. Matson".

**Kevin M. Matson, P.E.**  
Township Engineer

CC: Mr. Robert Pingar, P.E., Township Manager & Director of Engineering  
Pat McKenna, Westtown Township Solicitor  
Westtown Township Planning Commission