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February 16, 2017

Board of Supervisors
WESTTOWN TOWNSHIP
1039 Wilmington Pike
West Chester, PA 19382

Re: Planning Commission Recommendation for Toll PA XVIII, L.P.
Conditional Use Application for Flexible Development of Crebilly Farm

Dear Board Members:

At its special meeting on February 13, 2017, the Westtown Township Planning Commission (the "Planning Commission") met for the fifth time to consider the conditional use application filed by Toll PA XVIII, L.P. ("Applicant") for the proposed development of the Crebilly Farm with a flexible development containing 319 single family dwellings. Applicant seeks a conditional use pursuant to Sections 170-903.A and C of the Township Zoning Ordinance to allow the development of a flexible development with single family detached dwellings and multifamily dwellings on the property commonly referred to as the Crebilly Farm (the "Property"). At the conclusion of the meeting, the Planning Commission voted to make the following recommendation to the Board of Supervisors (the "Board"):

The Planning Commission does not believe that Applicant has demonstrated compliance with the criteria in §170-2009(D)1(h) of the Ordinance¹ and therefore, the application can be denied on that basis. However, if the Applicant at the conditional use hearings provides testimony to demonstrate that it has complied with that criteria, which is satisfactory to the Township's traffic consultant, then the Planning Commission would recommend that the Board approve the application subject to the conditions stated hereinbelow:

¹ Section 170-2009.D(1)(h) of the Ordinance requires an applicant seeking conditional use approval to prove to the satisfaction of the Board by credible evidence that:

the proposed flexible development will not result in or substantially add to a significant traffic hazard or significant traffic congestion;

peak traffic generated by the development shall be accommodated in a safe and efficient manner; and

applicant provides sufficient information detailing which improvements to streets it is committed to complete or fund in order to handle the increased traffic anticipated by the proposed flexible development.



The Planning Commission's recommendation is only applicable to the plan attached to the conditional use application labeled "Plan A" titled "Conditional Use Subdivision Plan for Crebilly Farm", prepared by ESE Consultants Inc., sheets one through 45, dated October 7, 2016 (hereinafter "Plan A"). The Planning Commission did not review the Proposed Density Bonus Development Plan which was attached to the conditional use application as Exhibit "J" ("Bonus Density Plan"). Therefore, the Planning Commission did not provide any recommendation to the Board on the Bonus Density Plan. If the Board were to indicate to Applicant that it prefers the Bonus Density Plan, the Planning Commission shall be given an opportunity to review that plan after Township consultants have provided review letters to the Planning Commission consistent with §170-2009.C(5) of the Ordinance. The recommendation set forth herein below shall not be applicable to the Bonus Density Plan:

- 1) The flexible development shall contain a maximum of 319 dwelling units, which shall include the two existing dwellings on the Property, provided that Applicant demonstrates to the satisfaction of the Township Engineer that the density of the proposed development meets the criteria in §170-904.E(1)(a) and §170-904.E(1)(c) of the Ordinance.
- 2) Plan A shall be revised to preserve a larger contiguous area of land on the western portion of the Property in the area designated in purple and labeled "Brandywine Battlefield Swath" on the review letter submitted by the Chester County Planning Commission ("CCPC") dated December 7, 2016, specifically Figure 3 of such letter, which letter is attached hereto as Exhibit "A". This area has been identified by Sean Moir of Western Heritage Mapping as the location of a portion of the 2nd Light Infantry Battalion and the Hessian Jaegers March en route to their engagement with the Continentals as part of the Battle of Brandywine (aka the Hessian March).
- 3) The area designated as the "Brandywine Battlefield Swath" on the CCPC review letter shall be limited to disturbance necessary for the development and installation of facilities for sewage disposal, stormwater management, access, utilities, agricultural or equestrian use, recreational areas, or historic interpretation and trails. The existing historic resources that are located on the Property in the area designated as "Brandywine Battlefield Swath" shall be maintained and adaptively reused in accordance with condition 25 below.
- 4) Plan A shall be revised to reduce the minimum building separation distance to 30 feet between clusters of carriage homes. This revision will permit further clustering of the development and allow the development to be shifted further to the east. In order to permit this reduction in building separation distance, the Planning Commission



recommends that the Board approve a modification pursuant to §170-904.E(10)(d) of the Ordinance.

- 5) Applicant shall satisfactorily address the comments raised by the Township traffic engineer in his correspondence dated December 27, 2016 and February 6, 2017.
- 6) Plan A shall be revised to provide a more continuous connector road (the "Connector Road") which shall connect W. Pleasant Grove Road through the Property to PA Route 926 generally consistent with the recommendation in the Township's Growth Management Plan. The Connector Road should be immediately west of Westminster Presbyterian Church and align with the proposed access to the Orvis commercial tract on the north and Bridlewood Boulevard on the south. The Connector Road shall be circuitous in design with the exact configuration, location and design being determined during land development with input from PennDOT and the Township engineer. If feasible, Applicant shall limit the number of homes which have direct access to the Connector Road.
- 7) The Connector Road shall be offered for dedication to the Township and shall be designed to adequately accommodate heavy equipment and truck traffic. Appropriate weight limitations for the Connector Road shall be determined during land development. The Planning Commission does not support the use of the Connector Road by heavy truck traffic after it is constructed.
- 8) Applicant shall construct a traffic signal at the intersection of the Connector Road and PA Route 926 and Bridlewood Boulevard, including fiber-optic interconnection to and coordination with the adjacent traffic signals along PA Route 926 at US Route 202 and New Street. If not immediately permitted by PennDOT as part of the development's Highway Occupancy Permit, funds for the future design, permitting and construction (including contingency and 10 years' escalation) of a traffic signal at this location shall be placed in an escrow account with the Township as beneficiary prior to the release of the final approved subdivision and land development plans for recording. The amount of money to be placed in escrow shall be determined by the Township Engineer and shall be posted by Applicant as part of the financial security which is posted pursuant to Section 509 of the Pennsylvania Municipalities Planning Code ("MPC"). The funds shall be used by the Township for installation of this traffic signal when permitted by PennDOT.



- 9) Plan A shall be revised to remove the proposed access to US Route 202. The development shall have no ingress or egress to US Route 202.
- 10) Applicant shall obtain all permits for design and construction of the following turn lanes (and ancillary infrastructure modifications including but not limited to traffic signals, drainage and pedestrian facilities):
 - a. A southbound right turn lane, 150' in length or as otherwise required by PennDOT, on US 202 at PA 926, and
 - b. An eastbound left turn lane, 500' in length or as otherwise required by PennDOT, on PA 926 at US 202.

The Planning Commission is aware that these traffic improvements were contemplated to be constructed by PennDOT and have been in the preliminary design phase for several years. These improvements must be completed as part of the proposed development, whether by Applicant or PennDOT.

- 11) Applicant shall revise Plan A to offer for dedication right-of-way along:
 - a. US Route 202, PA Route 926, New Street and West Pleasant Grove Road as appropriate to comply with § 170-1511, and
 - b. Along US Route 202 and PA Route 926 as appropriate to accommodate the improvements required by Condition #10 above.
- 12) Applicant shall improve the cart way of W. Pleasant Grove along the property frontage to:
 - a. Comply with § 149-903.A(2) for width,
 - b. Comply with § 149-910.D for paving,
 - c. Provide landscaping in accordance with a plan to be developed in coordination with and approved by the Township, and
 - d. Implement traffic calming measures in accordance with a plan to be developed in coordination with and approved by the Township. This may include roundabouts at the site accesses.



- 13) Applicant shall design, permit and construct the following turn lanes (and ancillary infrastructure modifications including but not limited to traffic signals, drainage and pedestrian facilities):
 - a. A southbound right turn lane, 75' in length or as otherwise required by PennDOT, on US 202 at West Pleasant Grove Road;
 - b. A southbound left turn lane, 100' in length or as otherwise required by PennDOT, on New Street at PA 926; and
 - c. An eastbound left turn lane, 75' in length or as otherwise required by PennDOT, on PA 926 at New Street.

- 14) Applicant shall implement traffic calming measures in accordance with plans to be developed in coordination with and approved by the Township(s) along the following roads:
 - a. Dunvegan Road;
 - b. Bridlewood Boulevard (in conjunction with Thornbury Township); and
 - c. Jacqueline Drive (if supported by post development traffic counts, completed following 50% and 100% occupancy, showing increased volumes).

- 15) Applicant shall eliminate the easternmost access onto W. Pleasant Grove Road which is proposed to be directly across from Hidden Pond Way. The secondary access to the development from W. Pleasant Grove Road shall be the Connector Road immediately west of the Westminster Presbyterian Church.

- 16) Any trees that are located within the right-of-way of W. Pleasant Grove Road and S. New Street that are determined to create an unsafe condition or pose a traffic hazard to vehicles traveling on such roads shall be removed by Applicant. The determination of which trees create an unsafe condition shall be determined by the Township engineer and road master and shall be marked on the final subdivision and land development plans.

- 17) Applicant shall implement an access and routing plan for construction vehicles to be developed in coordination with and approved by the Township. This plan should include the inspection and video documentation of all roadways adjacent to the site prior to the start of construction.



- 18) Applicant shall minimize the use of cul-de-sacs and eliminate the two cul-de-sacs in the northeastern portion of the Property.
- 19) The Connector Road shall include a pedestrian walkway on one side of the road and a multi-use paved pathway on the other side.
- 20) Plan A shall be revised to provide an integrated trail network which includes a perimeter trail in the locations generally consistent with the Township's Growth Management Plan. This perimeter trail shall loop along Pleasant Grove Road, New Street and Street Road and connect to the trail or sidewalks on the Connector Road. This perimeter trail shall be paved in accordance with specifications approved by the Board during land development and shall be dedicated to the Township for public use. The exact location, design and specifications for the perimeter trail on the Property shall be finalized during land development approval. The Planning Commission recognizes that Applicant will be required to provide proper crossings of wetlands to install this perimeter trail and obtaining such permits shall be a condition of final plan approval.
- 21) Applicant shall provide a trail connection to the trail in the Arborview development and a crosswalk on W. Pleasant Grove Road to connect the perimeter trail to the Arborview trail. Applicant shall provide a trail connection to the proposed trail in Thornbury Township on the Spackman parcel.
- 22) All trails shall be paved except for those trails located within environmentally sensitive areas where a different treatment may be used upon approval by the Township. Internal trails shall be dedicated to the homeowners association which is created for the development. The exact location, design and specifications for all internal trails on the Property shall be finalized during land development approval.
- 23) Plan A shall be revised to provide sidewalks on one side of the streets and suitable pedestrian connections to community facilities. The exact location of the sidewalks shall be determined during land development.
- 24) Prior to issuance of grading permits, Applicant shall cause to be conducted an archeological survey including ground penetrating radar survey of any areas proposed to be disturbed within the Brandywine Battlefield Swath which is depicted on the CCPC review letter dated December 7, 2016, Figure 3. Applicant shall share the



reports of the archaeological survey with the Township and Pennsylvania Historic and Museum Commission and preserve any artifacts discovered on the Property.

- 25) Applicant shall preserve the following historic structures located on the Property which are referenced in the Applicant's historic resource inventory titled "Physical Description of Historic Structures" prepared by Cultural Resource Consultants dated December 13, 2016 ("Historic Resource Inventory"):

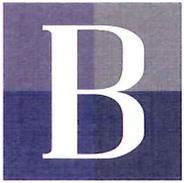
1. Chapel/springhouse- #24 on the Historic Resource Inventory;
2. The old Barn- Barn #1 on the Historic Resource Inventory;
3. The equestrian barn- #11 on the Historic Resource Inventory; and
4. The serpentine house on South New Street- #3 and buildings associated with this house (old stable, garage) #4, #5 on the Historic Resource Inventory.

These structures shall remain in their existing location on the Property and conveyed to the homeowners association for adaptive reuse as community facilities unless Applicant procures another third-party entity who wishes to own and maintain these historic resources. Nothing herein shall prevent Applicant from conveying these historic resources to another party for adaptive reuse and subject to restrictions or easements to ensure their continued use and preservation.

- 26) Applicant shall relocate the Westtown Inn/Darlington Tavern #25 on the Historic Resource Inventory to a location on the Property where it can be used near or in conjunction with an active recreational park to be provided on the Property. The exact location for the Westtown Inn shall be determined by the Board during land development with input from the Planning Commission and Park and Recreation Board.
- 27) Applicant shall remove the metal siding on the front right section of the J.Q. Taylor Tenant House (Item #29 on the Historic Resource Inventory), above and below the porch, and entirely on the east (right side) elevation (of the main block of the house) for further examination. If it is determined that such house has valuable historic significance due to its architecture, Applicant shall preserve the same.
- 28) All of the historic resources that are preserved shall be adaptively reused for any purpose as permitted by the Ordinance, subject to Township approval with input and recommendation from the Township Historical Commission.



- 29) Applicant shall execute and record façade or conservation easements on all Historic Resources that are preserved and adaptively reused. The terms of such easements shall be determined during land development.
- 30) Applicant shall ensure that the budget for the homeowners association provides sufficient revenues to ensure adequate long-term maintenance and operational costs associated with the preservation and continued adaptive reuse of any historic structures that are conveyed to the homeowners association.
- 31) Prior to the issuance of any grading permit for the Property, Applicant shall provide access to the Property and all historic structures located on the Property for members and/or representatives of the Township Historical Commission to document and photograph these historic structures.
- 32) The flexible development shall be serviced by public water.
- 33) The flexible development will be serviced by public sewer. Applicant shall construct the necessary upgrades to the Township's public sewer system which are necessary to provide sufficient capacity for the proposed development. The specific upgrades that Applicant must make to provide public sewer service to the development shall be determined by the Board during land development, however Applicant shall at a minimum provide the following improvements:
 - a. A sewage pump station to convey flow from the proposed development to the Township's existing sewer system. The pump station shall be designed to meet the standards provided by the Westtown Township's wastewater consultant. The pump station shall be sized to handle all proposed sewage flows from the development and an additional 35 EDU's from the adjacent Arborview Pump station.
 - b. Extend proposed sewers in Road K north across West Pleasant Grove Road into Dunvegan Road past the north right-of-way line of West Pleasant Grove Road.
 - c. Extend proposed sewers in Road L to West Pleasant Grove Road and then east in West Pleasant Grove Road to the Arborview Pump station.



- d. Reconstruct the Pleasant Grove Pump Station.
 - e. If the existing sewer collection system leading to the Pleasant Grove Pump station does not have sufficient capacity to handle the flows from the proposed development, the Planning Commission prefers that the wastewater be pumped from the Property Eastwardly in Street Road to Tower Course Drive.
- 34) Plan A shall be revised to eliminate the proposed effluent disposal areas. The areas depicted as proposed effluent disposal areas on Plan A shall be the location of an active recreational area to be dedicated to the Township or may be used to relocate development outside the Brandywine Battlefield Swath.
- 35) Applicant shall coordinate with the Township engineer during the land development process to select 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 and phosphorus reduction in the watersheds.
- 36) Applicant shall provide an easement as necessary to permit extension of sewer to the adjacent property, Chester County Tax Parcel No. 67-4-34, currently owned by Vasilious Moscharis. Any tap-in fee for same, as determined by the Township, shall be the responsibility of the owner of Parcel 67-4-34.
- 37) Applicant shall preserve existing trees along the property boundary with Parcel 67-4-34 and shall extend as necessary, a landscaped berm along the length of the dwelling on Parcel 67-4-34 to provide additional screening for this dwelling.
- 38) Applicant shall prepare and implement a deer management plan which shall address the effect of the proposed development on the deer population on the Property. This deer management plan shall be approved by the Township as part of land development.



- 39) Applicant shall address the comments in the Township engineer's review letter dated December 9, 2016 to the satisfaction of the Engineer and Board during land development approval.
- 40) Plan A shall be revised to add a note which restricts the total impervious cover that can be constructed on each individual lot. The total square footage of impervious coverage per lot shall be determined by the Township Engineer to be necessary to mitigate stormwater runoff from the individual lots, as determined at the land development phase. Applicant shall include in its marketing materials a note that advises the homeowners that they are limited in the total amount of impervious cover that may be developed on their lot and that they may not be able to add additional impervious cover for swimming pools, patios, decks and other hardscaping.
- 41) Applicant shall minimize impervious surfaces throughout the site, using green storm water management technology as applicable.
- 42) Applicant shall grant the Township easements across the open space on the Property for future basin upgrades that the Township may need to perform in order to comply with its MS4 permit requirements.
- 43) Applicant shall make every effort to balance the cuts and fills at the development to avoid the unnecessary import or export of soils during construction.
- 44) Applicant shall add a landscape berm along West Pleasant Grove Road from Hidden Pond Way to a point approximately 350 feet west of Dunvegan Road to mitigate the impact on the view shed from West Pleasant Grove Road.
- 45) Applicant shall provide an area of open space to be used for active recreation such as ballfields which shall be dedicated to the Township. The exact location of this recreational area shall be determined during land development.
- 46) Subject to PennDOT approval, Applicant shall install the necessary equipment to allow for traffic light preemption for use by the emergency responders along US Route 202 corridor.



- 47) Subject to PennDOT approval, Applicant shall install the necessary equipment to allow for traffic light preemption for use by the emergency responders along US Route 926 at the intersection with New Street.
- 48) Applicant shall provide an emergency access road from the Property to South New Street. Such access road shall be wide enough to accommodate the largest apparatus used by the Fame Fire Company. The details for the location, width and specifications for the emergency access road shall be determined by the Board during land development.
- 49) Applicant shall investigate if the western most access driveway on W. Pleasant Grove Rd. can be shifted to the east to not be directly aligned with Dunvegan Drive.

If you have any questions regarding the Planning Commission's recommendation, please do not hesitate to contact me.

Very truly yours,

Kristin S. Camp

KSC/akf
Enclosure

cc: Robert Pingar, P.E., Township Manager
Chris Patriarca, AICP, Township Planning Director
Planning Commission
Patrick M. McKenna, Esquire
Gregg I. Adelman, Esquire

EXHIBIT A



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
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(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:

<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.

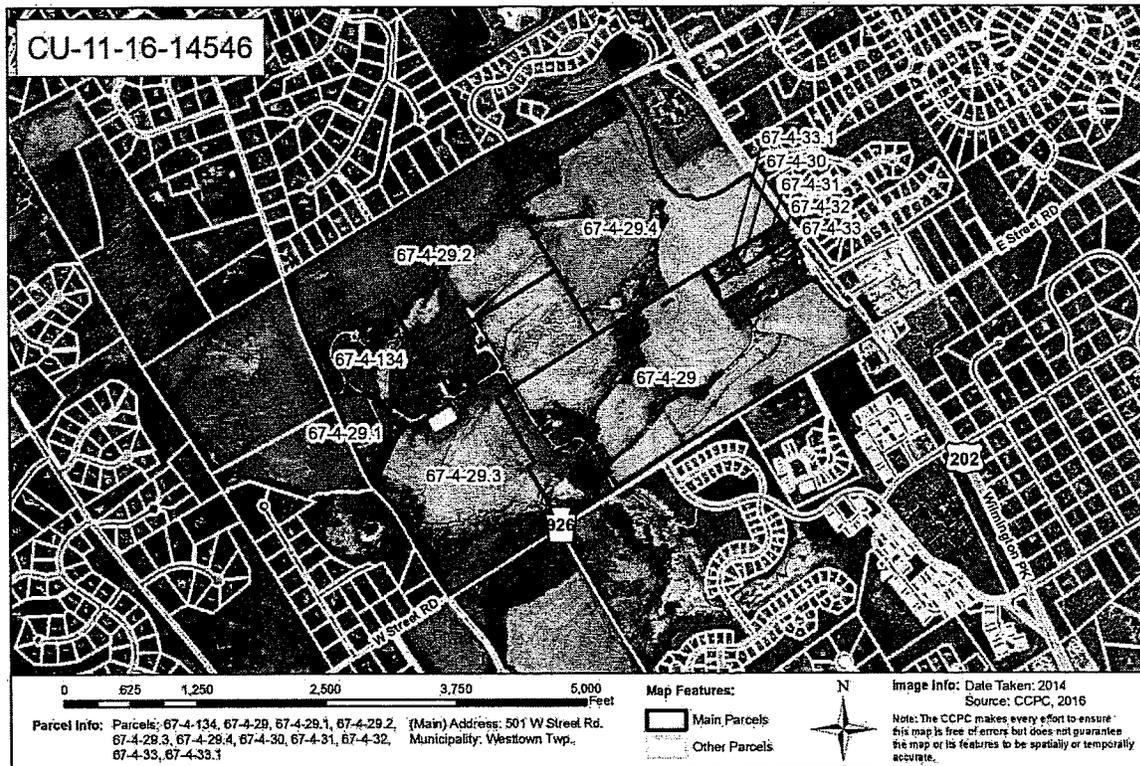


Figure 1: Location Map: Site of Crebilly Farm Conditional Use Application

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.”

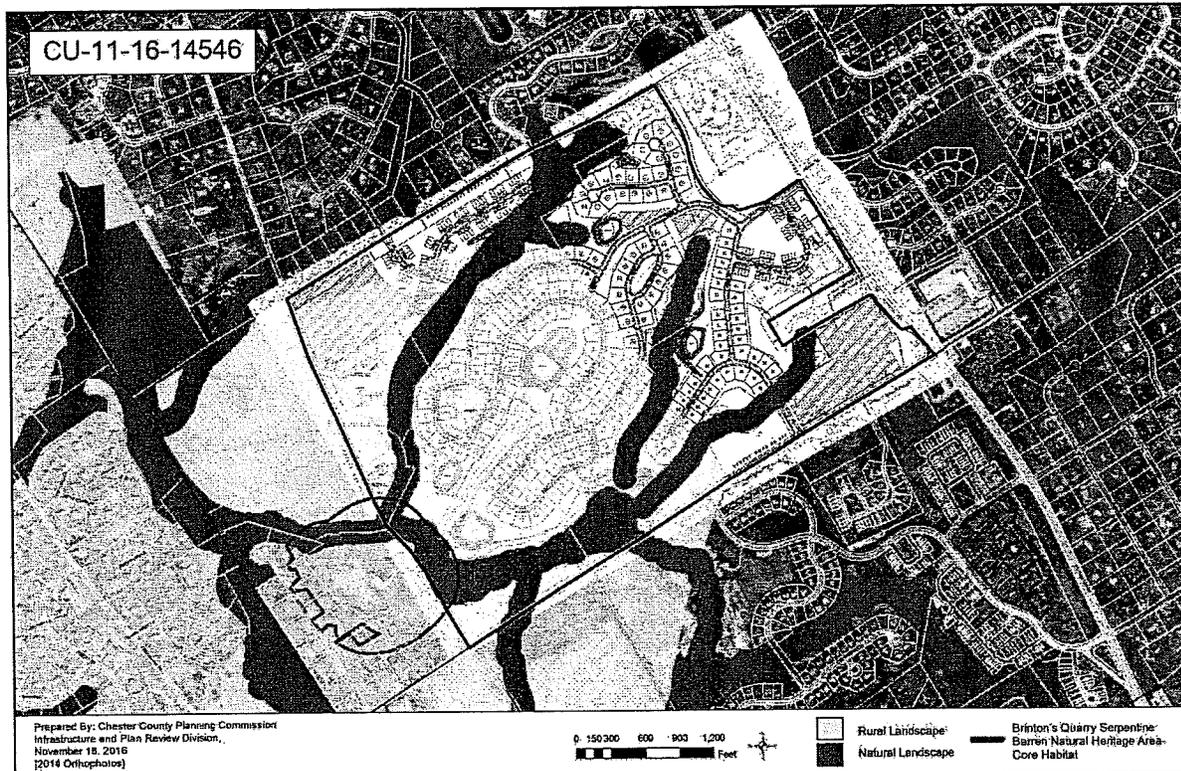


Figure 2: Crebilly Farm Conditional Use Application: Sheet 3-Overall Lot Layout, depicted with location of Rural Landscape and Natural Landscape designations, and the core habitat of the Brinton's Quarry Serpentine Barren Natural Heritage Area

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."

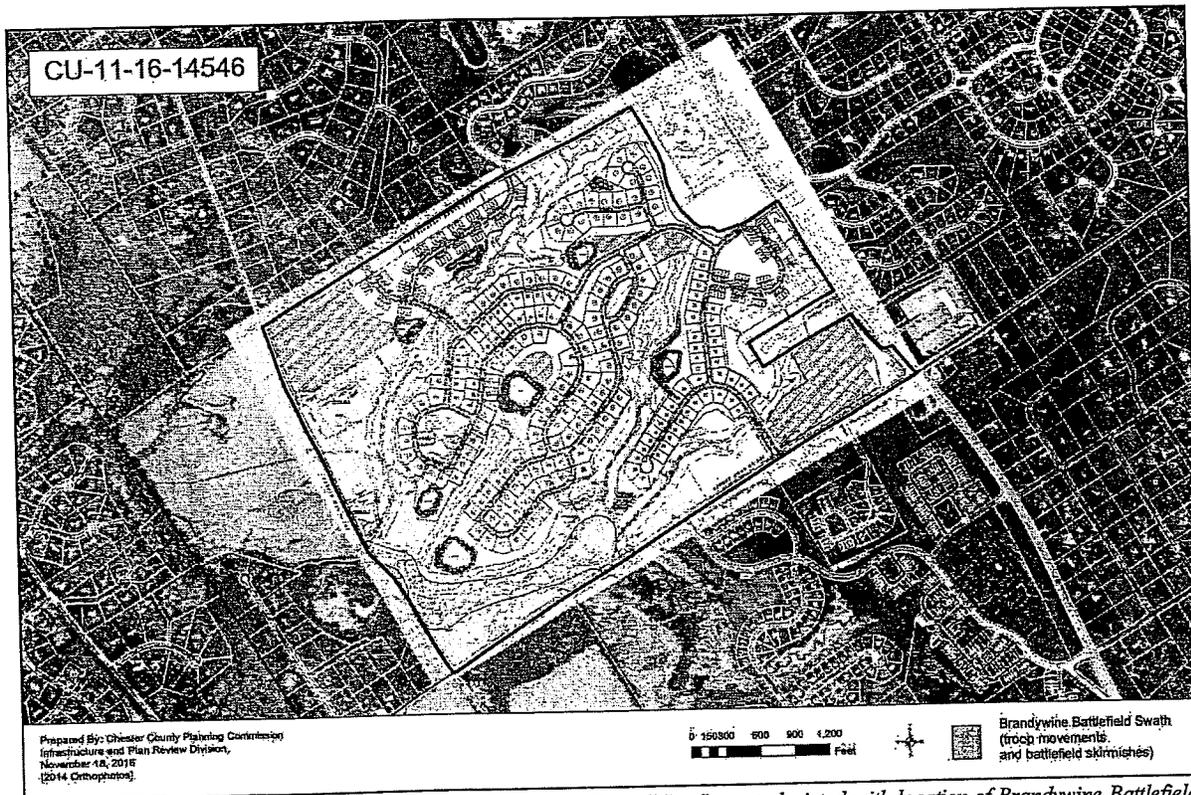


Figure 3: Crebilly Farm Conditional Use Application: Sheet 3-Overall Lot Layout, depicted with location of Brandywine Battlefield Swath (troop movements and battlefield skirmishes)

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.

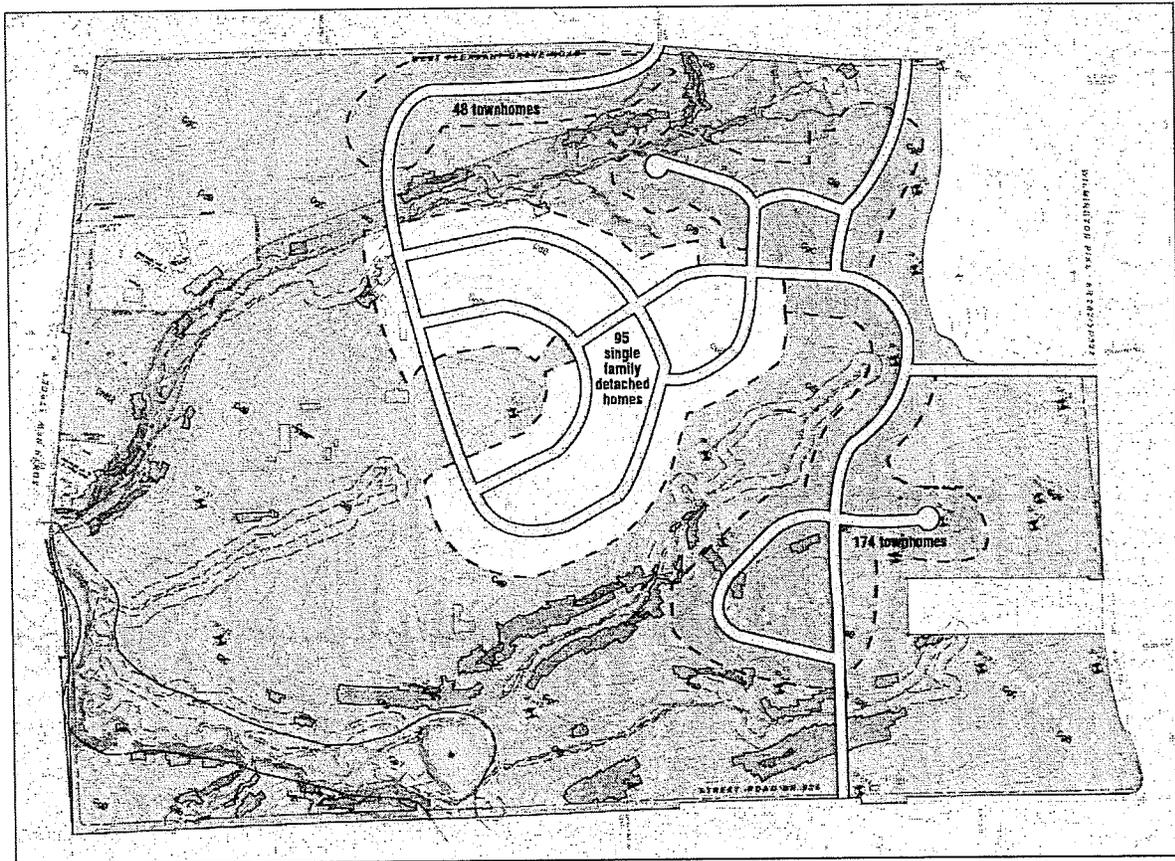


Figure 4: Conceptual Development of Crebilly Farm tract

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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>.

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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