

Exhibit B-18



# THE COUNTY OF CHESTER



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October 18, 2019

William Ethridge, AICP, Director of Planning & Zoning  
Westtown Township  
P.O. Box 79  
Westtown, PA 19395

Re: Conditional Use – The Robinson Tract  
# Westtown Township - CU-09-19-16071

Dear Mr. Ethridge:

A Conditional Use Plan entitled "The Robinson Tract", prepared by ESE Consultants, Inc., and dated August 9, 2019, was received by this office on September 19, 2019. Although our review is not required by Act 247, the Pennsylvania Municipalities Planning Code as amended, our comments are offered as a planning service at the request of Westtown Township. This review does not replace the need for an official referral by Westtown Township of a preliminary or final subdivision plan, as required by the Pennsylvania Municipalities Planning Code.

### **PROJECT SUMMARY:**

Location:	west side of Route 202, between Street Road (Route 926) and West Pleasant Grove Road
Site Acreage:	322.36
Proposed Land Use:	184 single family residential lots, 135 townhouse lots
Municipal Land Use Plan Designation:	Neighborhood Conservation, Open Space and Greenway
UPI#:	67-4-29, 67-4-29.1, 67-4-29.2, 67-4-29.3, 67-4-29.4, 67-4-30, 67-4-31, 67-4-33, 67-4-33.1, 67-4-32, 67-4-134

### **PROPOSAL:**

The applicant proposes the creation of 319 residential lots (184 single family lots and 135 townhouse lots), and 196.94 acres of open space. There are existing residences on Lots A and B. Additionally, existing buildings will be converted into a Community Club building, with 26 parking spaces, and an Amenity Center, with 54 parking spaces. The Application Narrative indicates that the proposed development will be served by public water, and either on-site (community) sewer or public sewer. The project site, which is located in the A/C Agricultural/Cluster Residential and R-1 Residential zoning districts, is being developed under the Flexible Development Procedure Requirements set forth in Article IX of the Township Zoning Ordinance, which requires conditional use approval.

**RECOMMENDATION:** The County Planning Commission recommends that 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.

BACKGROUND:

1. The County Planning Commission previously reviewed a conditional use application for this site. CCPC# CU-11-16-14546, dated December 7, 2016, addressed the creation of 319 residential lots (202 single-family residential and 117 townhouse lots), and 197.2 acres of open space. According to our records, this prior conditional use application was denied by the Township.

We acknowledge that the revisions depicted on the current plan submission include providing a higher percentage of townhouse lots, along with the construction of a collector road from West Pleasant Grove Road to Route 926 that is generally in alignment with the proposed collector road corridor depicted on the Roadway Functional Classifications map in the Township’s 2019 Comprehensive Plan. We also acknowledge that an Active Recreation Plan (Sheet 50) was included with the current application. Furthermore, the current submission included conservation design plans (Sheets 3 through 11), which depict primary and secondary conservation areas, along with scenic views. 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.

2. The County Planning Commission recently reviewed two zoning amendments pertaining to revisions to the A/C Agricultural/Cluster Residential district and the Flexible Development Procedure standards in Article IX of the Township Zoning Ordinance, the latest of which occurred on July 26, 2019 (CCPC# ZA-07-19-15979). It is our understanding that, while the Township adopted these zoning amendments on August 19, 2019, the current conditional use application is being reviewed under the zoning ordinance in effect on August 16, 2019.

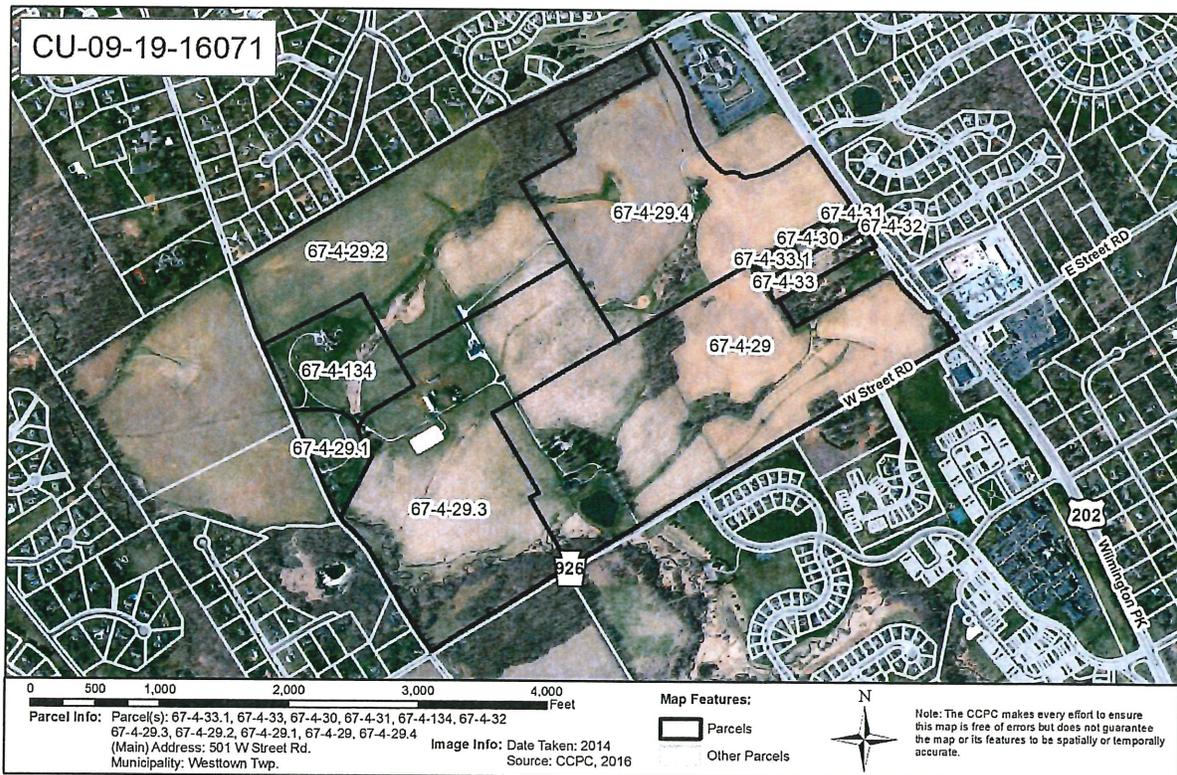


Figure 1: Location Map – The Robinson Tract (aka Crebilly Farm)

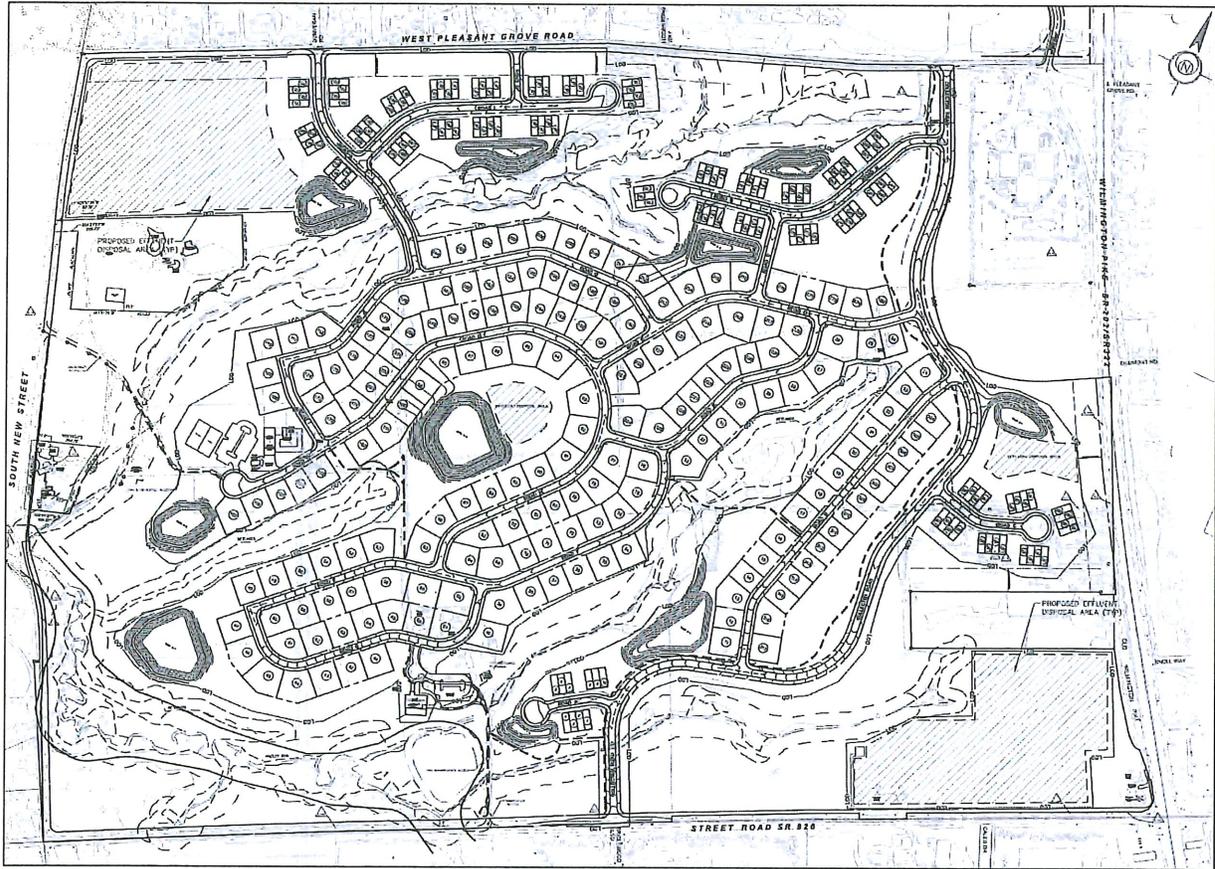


Figure 2: Site Plan Detail, Sheet 12, Conditional Use Application, The Robinson Tract

**LANDSCAPES:**

3. While the eastern portion of the project site is located within the **Suburban Landscape** designation of *Landscapes3*, the 2018 County Comprehensive Plan, the central and western portions are located in the **Rural Landscape** and **Brandywine Battlefield** Overlay designations. Additionally, the **Natural Landscape** designation extends across the entire tract. The vision for the **Suburban Landscape** is predominantly residential communities with locally-oriented commercial uses and facilities, accommodating growth at a medium density that retains a focus on residential neighborhoods, with enhancements in housing diversity and affordability. Additionally, roads, sidewalks and paths with convenient access to parks and community facilities should be provided. The vision for the **Rural Landscape** is the preservation of significant areas of open space, critical natural areas, and cultural resources with a limited amount of context sensitive development permitted to accommodate residential and farm needs. As an overlay of all other landscapes, the county's **Natural Landscapes** consist of a network of streams, wetlands, floodplains, and forests that are protected by regulations or should be subject to limited disturbance. Conservation practices should protect and restore these natural resources. *Landscapes3* recognizes the Brandywine Battlefield as an overlay area on the Landscapes Map. Development within or adjacent to the Brandywine Battlefield should preserve key lands, adaptively reuse historic resources, and apply context-sensitive design to integrate with distinctive cultural features and the nationally significant cultural landscape.

While single family detached and townhouse development is an appropriate use in 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 *Landscapes3*. In order for the proposed development of the Robinson Tract to be generally consistent with *Landscapes3*, 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 #5).

WATERSHEDS:

4. *Watersheds*, the water resources component of *Landscapes3*, indicates the proposed development is located within the Radley Run subbasin of the Brandywine Creek watershed, and the Chester Creek watershed. *Watersheds'* highest priority land use objectives within the Brandywine Creek and Chester Creek watersheds are: reduce stormwater runoff, restore water quality of "impaired" streams, and protect vegetated riparian corridors. *Watersheds* can be accessed at [www.chesco.org/water](http://www.chesco.org/water).

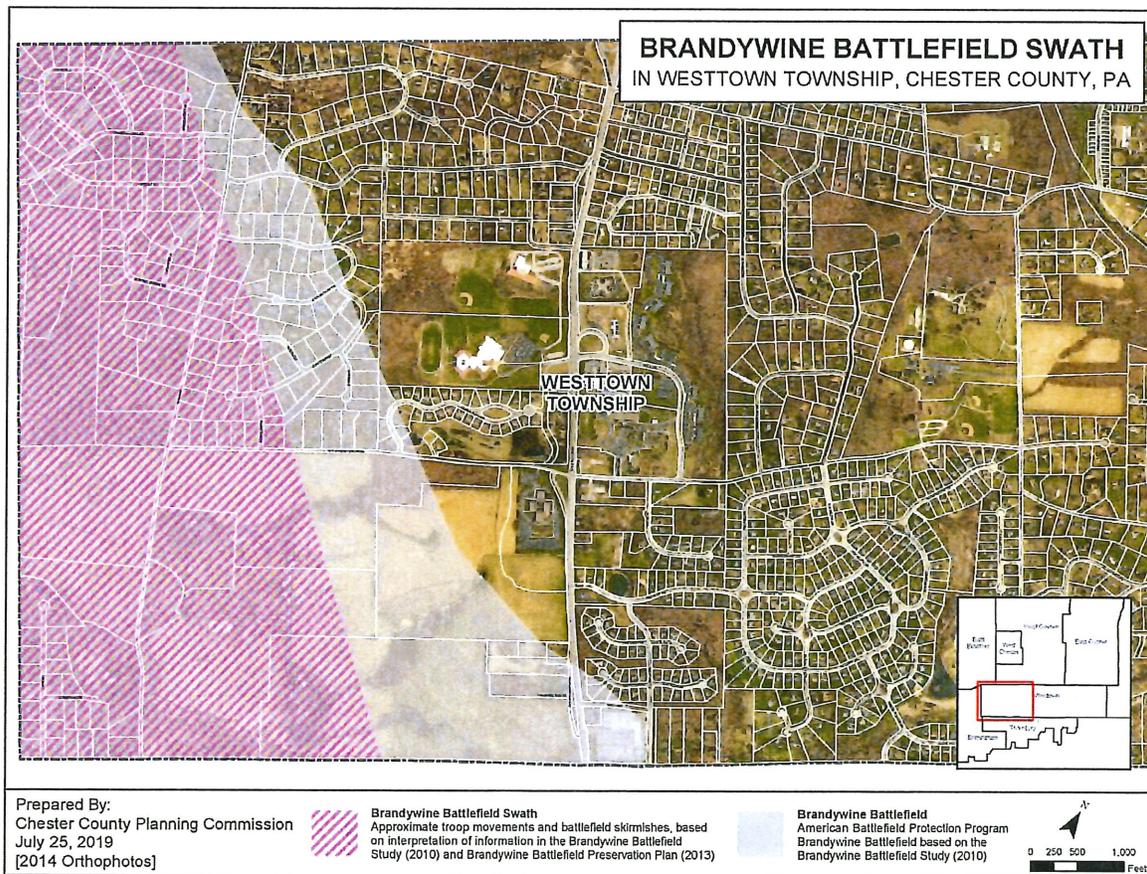


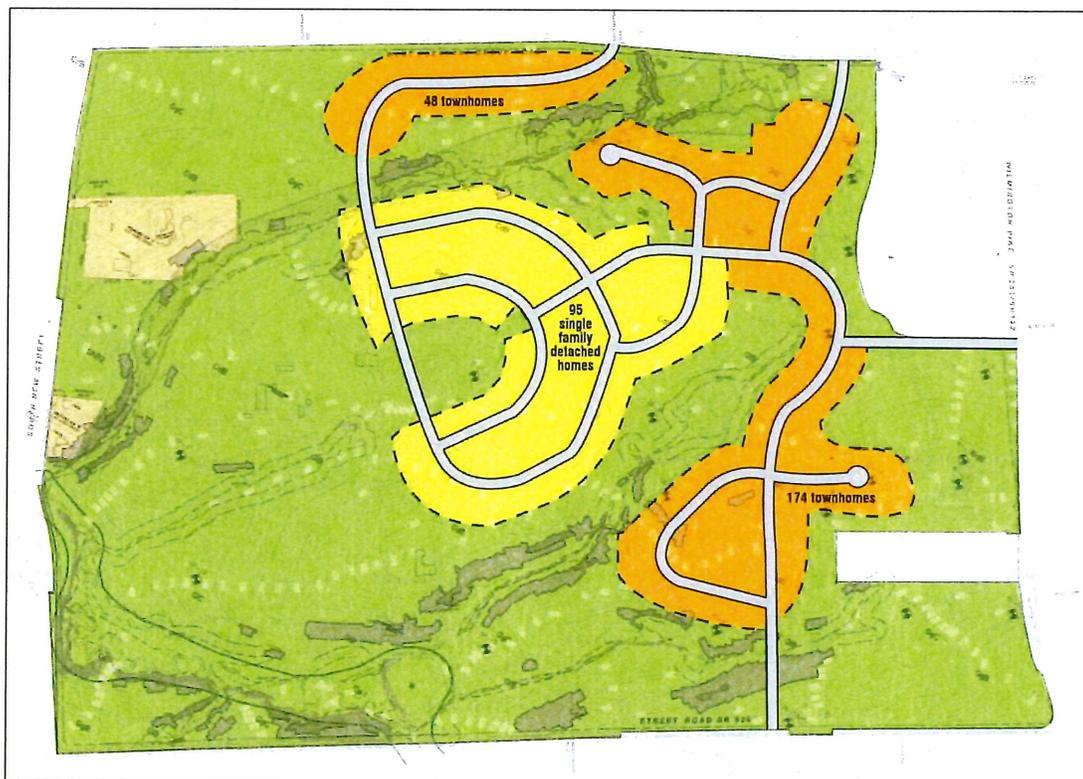
Figure 3: Brandywine Battlefield Swath, Approximate troop movements and battlefield skirmishes

PRIMARY ISSUES:

Site Design/Historic Preservation:

5. 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, and outside of the Brandywine Battlefield, particularly the area of approximate troop movements and battlefield skirmishes shown in Figure 3 on page 4 as the “Brandywine Battlefield Swath.” This will also provide some protection for the Crebilly Farm which is eligible for the National Register as a gentleman’s farm. Additionally, we note that the Westtown Inn (aka Darlington Corners Inn, built circa 1820) at the northwest corner of the Route 202 and Route 926 is eligible for the National Register of Historic Places. “Appreciate” Objective A of *Landscapes3*, the 2018 County Comprehensive Plan, is to preserve historic resources in their context while supporting appropriate reuse as a vital part of our community infrastructure and character. Additional information on this issue is available online at: [www.chescoplanning.org/Landscapes3/lc-Appreciate.cfm](http://www.chescoplanning.org/Landscapes3/lc-Appreciate.cfm).

Figure 4, which was also provided in our previous review letter, provides a conceptual illustration of how development activity on the Robinson 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: Chester County Planning Commission's conceptual illustration of development on the Robinson Tract (December 7, 2016)*

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6. As stated in our previous review, 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.
7. For clarity purposes, the applicant should provide a comprehensive list of all buildings/structures on the project site, which identifies what will happen to each building/structure (whether it will remain as is, be adaptively reused, or demolished). While we acknowledge that a report outlining the physical description of the structures on the site was included with the submission to the County Planning Commission, we note that this report, dated December 13, 2016, pre-dates the March 27, 2017 correspondence from the Pennsylvania State Historic Preservation Office (PA SHPO) that the Crebilly Farm is eligible for the National Register of Historic Places.
8. The applicant should clearly identify how access will be provided to all proposed open space areas, for both the uses 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 portion of the site should be conserved via easements.
9. For clarity purposes, the applicant should identify if the proposed open space areas will be deed restricted. If not, the Township should consider requiring the open space areas be deed restricted from further development.
10. The application materials indicate that the garage entrances will be located on the front of the townhouse units. We suggest that the end units be oriented so that the garages are side-loaded.
11. Land conservation is an option. The County would be happy to work with the applicant, Township and conservancies to preserve this property.

#### Access and Circulation:

12. Primary vehicular access to the site will be provided from a collector road that extends from West Pleasant Grove Road to Route 926 at its intersection with Bridlewood Boulevard. Additionally, two road connections onto Pleasant Grove Road west of the proposed collector road will be provided. The Transportation Impact Study prepared by McMahon Associates, Inc., and dated August 13, 2019, states that a traffic signal will be installed at the Collector Road/Route 926/Bridlewood Boulevard intersection, when warranted in accordance with PennDOT criteria (page 22). The Study also recommends that the applicant will complete traffic signal retiming optimization of the Route 926/New Street and Route 202/Route 926 intersections.

Both the Township Engineer and PennDOT should review the findings in the Transportation Impact Study. In particular, the Township should examine the impacts the additional traffic will have upon the existing residences along West Pleasant Grove Road. Additionally, the Collector Road/Route 926/Bridlewood Boulevard intersection should be in a closed loop signal system with the other existing signals along Route 926 in the immediate vicinity of the project site.

Furthermore, the applicant should identify the location of the proposed improvements to the Route 202/Route 926 intersection that are being proposed by PennDOT on the site plan. The applicant should dedicate any required right-of-way, and potentially build the improvements that are on the applicant's site.

The Collector Road will assuredly have higher volumes from both site (20-30%) and off site (70-80%) cut through traffic (as noted on page 23 of the Transportation Impact Study), and is presumed to have a maximum speed limit of 35 miles per hour, though that is not stated in the Transportation Impact Study. During peak hours, some traffic may divert onto Road B, particularly southbound as a means to shortcut the Collector Road. The internal roadways with house frontage, such as Road B, are assumed to be 25 miles per hour, and consideration should be given toward the installation of traffic calming measures such as speed humps on Road B to discourage any cut through traffic.

13. The applicant should show on the plans the two lanes of egress at the Collector Road/Route 926/Bridlewood Boulevard intersection, as recommended in the Transportation Impact Study, particularly since the applicant will be making these improvements.
14. While the site plan depicts the location of six foot wide asphalt trails within the eastern and central portion of the site, the site plan does not indicate that sidewalks will be provided, particularly on the eastern portion of the site. Sidewalks should be provided along all interior roadways, on both sides. The proposed 50 foot wide rights-of-way and 24 foot roadways leave ample space for the placement of a minimum five foot sidewalk. Residents should not be forced to walk within the roadways. Direct pedestrian access (sidewalks and crosswalk areas) should also be provided to the adjoining Westminster Presbyterian Church site located at the southwest corner of the Route 202/West Pleasant Grove Road intersection.

Additionally, the Trails and Bikeways Map in the Township's 2019 Comprehensive Plan depicts the location of a trail corridor that generally extends around the perimeter of the site to the west of the connector road corridor, with trail connections to the north. The Township's 2014 Open Space, Recreation and Environmental Resources Plan Update (page 19) states that this trail "would be a much needed amenity for the western end of the Township." Crosswalks should be provided as part of this pedestrian trail network.

15. If the six foot wide asphalt trails are to be available for public use and are to permit both pedestrians and bicyclists, these trails should be a minimum of 8 feet and preferably 10 feet wide, as is the standard for a multi-use trail. Additional information on this topic is provided in the Shared Use Facilities Design Element of the Chester County [Multi-Modal Circulation Handbook](#) (2016 Update). This information is available online at:  
<https://www.chescoplanning.org/municorner/MultiModal/03-SharedFacs.cfm>
16. Direct pedestrian access, including trail connections within open space areas, should be provided to all proposed recreation facilities. While we acknowledge that the proposed trail network extends to the community club building on the southern portion of the site, it does not appear to extend to the activity center. The applicant and Township should refer to the Pedestrian Facilities Design Element of the Chester County [Multi-Modal Circulation Handbook](#) (2016 Update) in its design of the pedestrian facilities for this development. This information is available online at:  
<http://www.chescoplanning.org/MuniCorner/MultiModal/02-PedFacs.cfm>.
17. The site plan depicts the location of two emergency access connections (one onto Street Road west of the Collector Road/Route 926/Bridlewood Boulevard intersection, and one onto South New Street). However, no design details for these emergency access 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 County Planning Commission's [Multimodal Circulation Handbook](#) (2016 Update) in its design of the emergency access connections. This information is available online at: [www.chesco.org/DocumentCenter/View/27034](http://www.chesco.org/DocumentCenter/View/27034).

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Natural Features Protection:

18. The 2015 Chester County Natural Heritage Inventory, which is available online at [chescoplanning.org/natresources/ResourcesChesco.cfm](http://chescoplanning.org/natresources/ResourcesChesco.cfm), indicates 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. *Landscapes3* recognizes NHA core habitat areas as natural resource priority protection areas. Protecting natural areas helps ensure that the critical functions these areas provide will not diminish due to development. 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](mailto:RA-HeritageReview@pa.gov)) for further information on this matter.
19. 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.
20. While a plan note on Sheets 2, 3 and 11 indicate that the floodplain information is taken from maps dated September 29, 2017, a plan note on Sheet 5 indicates that floodplain information was taken from maps dated September 29, 2006. This should be clarified by the applicant.
21. The site 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 ensure that off-site drainage conditions are not negatively affected.
22. We suggest that the applicant and Township investigate the feasibility of increasing the riparian buffers provided along the creeks that traverse the project site, and do stream bank stabilization and tree plantings along these corridors. *Landscapes3* supports the comprehensive protection and restoration of the county's ecosystems, including riparian corridors ("Protect" Objective B, page 63).
23. The site plan indicates that the Collector Road will cross a stream to the immediate north of Route 926. The applicant should be aware that an encroachment permit may be required by the Pennsylvania Department of Environmental Protection in accordance with Section 105.293 of its Rules and Regulations. The applicant should supply information on the installation technique and materials to ensure that there will be no stream degradation (or seepage of effluent into the stream).

Zoning Ordinance Compliance:

24. While Sheet 12-Overall Lot Layout provides a brief list of the tract area, proposed density and proposed impervious coverage of the development, it does not provide a zoning compliance table. This should be clarified by the applicant.

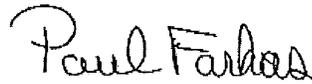
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Stormwater Management:

25. Land disturbance and land development activities that occur within Chester County must comply with the *County-wide Act 167 Stormwater Management Plan for Chester County, PA* (July 2013) and the associated Act 167 stormwater management ordinance standards adopted by each municipality.
26. The applicant and the Township should consider “naturalizing” the stormwater management basin by adding additional landscaping/vegetative screening to soften the appearance of the facilities.

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, L.P.  
Teresa DeStefano, Planning Commission Secretary, Thornbury Township  
Anthony Antonelli, District Permits Manager, PennDOT  
Francis J. Hanney, PennDOT