

Exhibit B-19



October 3, 2019

Mr. Will Ethridge, AICP, Director of Planning and Zoning
Westtown Township
1039 Wilmington Pike
West Chester, PA 19382

**RE: Crebilly II - The Robinson Tract Proposed Development
Conditional Use Application – Review 1 (Plans Dated 08-09-2019)
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/UPI: 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.: 5675.44**

Dear Mr. Ethridge:

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

- 1) *Conditional Use Subdivision Application and Plan for The Robinson Tract/ Proposed Development*, sheets 1 to 71, prepared by ESE Consultants, Inc., dated August 9, 2019.

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 (182 single-family and 135 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 and Street Road (S.R. 926), and one (1) emergency access from South New Street.

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).

NEW COMMENTS

1. §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.
2. The applicant should confirm the availability of the proposed landscaping for the site. Previous applications have requested waivers and substitutions.

3. **§149-902** – The applicant should provide cross sections for the proposed roadways on the site.
4. The final design and layout for the Collector Road should be a topic of conversation between the design firm and the Township review staff. Specific consideration should be given to areas between the Collector Road and the property line of the West Minister Presbyterian Church. We have reservations that the 100' building setback is applied throughout the site and special consideration should be given to the area in question.
5. At the intersection of “Road N” and the proposed Collector Road, additional landscaping may be warranted due to vehicular traffic movements.
6. The final location of the proposed trail should be a matter of discussion between the design firm, Planning Commission, and the appropriate emergency personnel to ensure accessibility.
7. The drainage catchment area for the site conveys flow to the South New Street Bridge along Radley Run. As a measure of verifying the health of the infrastructure, the applicant should consider providing resources to the Township to improve and enhance the current condition of the bridge features such as guiderail, masonry, and the wing walls. A report regarding the current state of the bridge is on file at the Township building.
8. Consideration should be given to the overall regional planning for the proposed trail and the existing trail located on the Northern properties approaching Stetson Middle School.

ZONING

9. **§170-904.E.2.c** – Not more than 45% of the gross area of the tract shall be covered by impervious surfaces. It appears to be in compliant with the code, however; during the land development process, the designers should be aware of the future homeowners to add amenities to the existing lot that could alter the impervious coverage calculations.
10. **§170-904.E.2.d.1** – Streets within an integrated townhouse development shall be designed in accordance with the terms of Chapter 149, Subdivision and Land Development; provisions for the maintenance of any private streets shall be an essential part of the plan for development. The Township may, but is not required to, accept dedication of the streets within the integrated townhouse development for public use. It may require the posting of security in an amount and form satisfactory to it for the construction of such streets, as set forth in Chapter 149, Subdivision and Land Development.
11. **§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.
12. **§170-904.E.5** – To create architectural interest in the layout and character of housing fronting streets, variations in building line shall be encouraged.
13. **§170-904.E.7** – Building height shall be limited to three stories not to exceed 38 feet.
14. **§170-904.E.10.a** – No structure shall be within 30 feet of the curb of access roads.
15. **§170-904.E.11** – Single-family detached dwellings, and uses accessory thereto, shall be a minimum of 50 feet, and all other structures shall be a minimum of 100 feet, from the property lines of the tract. The existing dwelling located on Proposed Lot B is less than 50 feet from the property line of the tract. The applicant should coordinate the existing non-

conformity with the Township Solicitor.

16. **§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.
17. **§170-905.A.3** – The applicant shall submit a proposed stormwater management plan, to be approved by the Township Engineer in accordance with Chapter 149, Subdivision and Land Development. In addition, the Board may require the submission of a study of the off-site and overall groundwater impacts of the proposed stormwater management system. The applicant should ensure adequate drainage around the proposed townhouses.
18. **§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.
19. **§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.
20. **§170-905.E** – Lighting, as required by **§170-1514**. The applicant should provide a lighting plan for review with the next submission.
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. **170-2009.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.
25. **§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.

GENERAL COMMENTS

26. The applicant shall provide background information and assumptions for the preparation of the Existing Conditions Plan and include all areas subtracted to obtain the total design area.
27. 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.
28. 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.
29. The applicant must address all concerns expressed by the Police Chief.

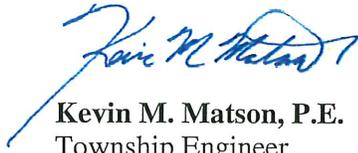


30. The applicant must address all concerns expressed by the West Chester Fire Chief.
31. The applicant should consider providing area and bulk regulations depicting setback restrictions for each individual lot for future construction.

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.

Regards,



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