

October 26, 2018

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

**RE: Westtown School – Athletic Fields
Conditional Use Application – Review 2
(Plans Dated 07-23-2018)**

Address: 975 Westtown Road, West Chester, PA 19382
Record Owner / Applicant: Westtown School
Applicant's Representative: Timothy B. Barnard, Esq.
Zoning: (A/C) Agricultural / Cluster Residential
TPN/UPI: 67-5-27
MT No.: 5675.35

Dear Mr. Ethridge:

We are in receipt of the following information submitted on behalf of the applicant, Westtown School:

- 1) *Westtown Township Conditional Use Application*, prepared by the applicant's representative, dated August 7, 2018;
- 2) *Project Narrative*, dated August 7, 2018;
- 3) *LED Lighting System Summary*, prepared by Mid-Atlantic Sports Construction, dated August 7, 2018; including *Attachment 1 – ChescoViews Plan Mark-up; Attachment 2 – LED Lighting Pole Summary / Photo of various Lights from 1977-2015; and Attachment 3 – LED Light Bulb Summary / Photo of Light Bulb Types from 1977-2013;*
- 4) *Conditional use Application Site Plan (2 Sheets)*, prepared by ELA Group, Inc., dated July 23, 2018;
- 5) *Westtown School Oak Lane Project / Stormwater Management Narrative for Conditional Use Application*, prepared by ELA Group, Inc.; and
- 6) *Traffic / Internal Circulation / Parking Review*, prepared by Traffic Planning and Design, Inc., dated July 25, 2018; including peak hour volume counts.

Supplemental Information Received 9-28-2018:

- 7) *Aerial View Reflecting Distance to Existing Houses*, undated;
- 8) *Westtown School Letter, "Proposed number of nights for low-impact illumination of athletic fields," prepared by Tori Jueds*, dated September 28, 2018;
- 9) *Westtown School & Township Fact Sheet*, dated Fall, 2018;
- 10) *Westtown School Requests for Zoning Amendment and Conditional Use Approval for Lighted Athletic*, prepared by *Anchor Management Group letter*, dated September 25, 2018;

11) *Westtown School, Oaks Lane, Proposed Soccer Field Lighting Conditional Use Application, prepared by Anchor Management Group letter, dated September 25, 2018;*

12) *“Westtown School Presentation – Oak Lane Project,” dated September 5, 2018.*

PROJECT OVERVIEW

The applicant, Westtown School, is proposing to renovate their existing sport fields with two synthetic (2) turf fields which would be accompanied by Musco Lighting consisting of six (6) poles each 80 ft tall containing eleven (11) playing field LED Lights. An additional parking area with 84 new parking spaces, and stormwater Best Management Practices (BMP) are proposed. The lights would be “Full Cut Off” lights and are to be shut off no later than 10:00 PM. Additionally, lighting shields and a “Spill Summary” will be performed with the installation of the lights to ensure they are functioning as designed. It is noted that the two (2) proposed turf fields are proposed to replace the existing grass athletic fields. The applicant has indicated that field lighting is a necessary component to the financial viability of the turf field and that the lighting will provide a much needed service to the community. The Westtown School has indicated that outside organizations, including local community organizations, will be permitted to rent / utilize the proposed turf athletic fields.

The supplemental information we received on September 28, 2018 indicates a proposed softball and baseball field. During the final development of conditions, the full record application should be made clear.

The existing site consists of grass athletic fields located south east of the intersection of Westtown Road (SR 2007) and Oak Lane (Private Road). The existing fields are serviced from an existing parking area east of the fields. The site drains to the East Branch of the Chester Creek, classified as a Trout Stocking Fishery (TSF) and Migratory Fishery (MF) stream. The site is zoned (A/C) Agriculture / Cluster Residential.

The Conditional Use Application is submitted per **§170-1514.D.5:**

Permanent recreational and sports lighting and nighttime events. Subject to the conditions listed herein, permanent outdoor illumination for active recreational and sports facilities accessory to public, private, and parochial schools, universities and colleges and for passive non-recreational nighttime events shall be permitted when approved as a conditional use by the Westtown Township Board of Supervisors.

VARIANCES

To date, the applicant has not formally requested any variances.

WAIVER

To date, the applicant has not formally requested any waivers.

PURPOSE

The purpose of this review is to determine if this application complies with Westtown Township’s Ordinances, specifically **Conditional Uses (§170-2009)**, **(A/C) Agricultural / Cluster Residential Use Regulations (§170-501.C)**, **A/C Area and Bulk Requirements (§170-502.G)**, **A/C Conditional Use Design Standards (§170-503.A)**, and **General Requirements / Outdoor Lighting Permanent Recreational Lighting Conditional Use Applications (§170-1514.D.5)**. Our office has reviewed this

application in accordance with the above requirements, as well as reasonable and customary engineering standards.

After the issuance of our 10/15/2018 letter, the applicant requested that many comments be addressed, in full satisfaction, during the more detailed land development application. We have had the opportunity to dialogue with the Township Solicitor who has no objection to separating the more core conditional use related issues, versus the land development specifics. The comments relating to the land development process have been removed from this letter, and updates on remaining comments, where applicable, have been offered for your consideration:

CONDITIONAL USES

1. **§170-2009.B.3.c** – The approximate location of stormwater basins and swales shall be shown on the plans. The applicant indicates that stormwater will be attenuated via various stormwater BMP's including pervious pavement with infiltration, subsurface infiltration facilities, infiltration trenches, rain gardens, conventional detention and infiltration basins and by conserving riparian areas; however, the provided plan does not indicate the general locations of the proposed stormwater BMPs. The plans should be revised to depict the general location of the proposed stormwater management features.

MT Update: *We had the opportunity to meet with the applicant's design team regarding the layout of the proposed stormwater management plans, provide feedback as to the layout, and discuss the interpretation of the ordinance as it applies to the site. The applicant has provided enough information to demonstrate feasibility of code compliance as it relates to water quality, attenuation and the impact of the use from the perspective of stormwater management.*

2. **§170-2009.B.3.d & §170-2009.B.6.c** – A Conditional Use application shall include sufficient information (i.e., preliminary site grading, stormwater management analysis, etc.), to preliminarily determine compliance with the Township's natural features, site analysis, conservation design process, if applicable and density requirements. The applicant has not completed a preliminary stormwater management analysis to date; however, they have stated in a Stormwater Management Narrative the anticipated stormwater management facilities. No preliminary stormwater management calculations have been provided. A preliminary stormwater management report should be provided for review and the plans should be revised to depict the general location and size of the proposed stormwater management features.

MT Update: *We had the opportunity to meet with the applicant's design team regarding the layout of the proposed stormwater management plans, provide feedback as to the layout, and discuss the interpretation of the ordinance as it applies to the site. The applicant has provided enough information to demonstrate feasibility of code compliance as it relates to water quality, attenuation and the impact of the use from the perspective of stormwater management.*

3. **§170-2009.D.1.F** – The ordinance requires that 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.

Demonstration that the proposed athletic fields can be adequately serviced with utilities and emergency services has not been adequately addressed. Additional information in regard to public utilities (i.e., water supply, sewage disposal, electric, gas, etc.), emergency services including police and fire protection, should be provided. The following items should be addressed:

- a. The applicant shall ensure provide information in regard to the available / proposed restroom facilities / sanitary sewer capacity for the athletic fields, as an increase in usage is anticipated through other organizations potentially utilizing the proposed fields. If additional restroom facilities are anticipated, a Planning Module may be applicable. We defer to the Pennsylvania Department of Environmental Protection (PA DEP), the Chester County Health Department (CCHD) and the Township's Sanitary Sewer Consultant for all sanitary related items.
- b. The applicant shall coordinate with the applicable representative from the governing Fire Company to ensure the proposed site can be adequately serviced with emergency services and vehicles. Applicable fire truck turning templates should be provided for the Fire Company review.
- c. The applicant shall coordinate with the Westtown-East Goshen Regional Department to ensure the proposed athletic fields can be adequately serviced with emergency services.

MT Update: *We are awaiting responses from the applicant on the above issues, we would anticipate that letters from the parties would be submitted as part of the record of the Conditional Use process.*

ZONING

A/C Conditional Uses §170-501.C

§170-501.C – This section defines what uses are permitted via Conditional Use within the A/C Zoning District. It is noted that the existing use of the site is a Private School with Athletic Fields, which is permitted by Special Exception. It is noted that the proposed use of turf athletic fields and additional parking in lieu of the existing grass fields does not change the overall Use of the site; however, it adds an additional Accessory use of “Permanent Recreational and Sports Lighting and Night Time Events” in accordance with **§170-1514.D.5**, if approved by the Board of Supervisors.

A/C Conditional Use Area and Bulk Requirements in accordance with §170-502.G.

4. **§170-502.G** – Nonresidential conditional uses shall conform to the standards for nonresidential uses in **Article VII, §170-702.E**. Applicable zoning compliance requirements are defined by **§170-702.E**; however, the applicant has not referenced the Zoning Requirements and Compliance information for the proposed improvements on the plans. Applicable information in regard to lot area, setbacks, impervious coverages, building coverages, lot width at street line, building height, buffer requirements, etc. should be indicated on the plans.

MT Update: *The applicant has not yet updated the plan set.*

- a. **§170-503.A.8 – Interior Circulation shall meet the requirements of §170-1513**
 - i. Interior drive widths for Commercial and All other Uses shall be 28 ft wide. The applicant shall indicate the width of Oak Lane. It appears Oak Lane may

be required to be widened to 28 feet wide to promote safe circulation to and from the proposed athletic fields.

MT Update: *The applicant may seek relief from this section to preserve the existing significant features at the site, subject to the feedback of Police, Fire and EMS Services.*

LIGHTING / PERMANENT RECREATIONAL AND SPORTS LIGHTING AND NIGHTTIME EVENTS

§170-1514.D.5 – Subject to the conditions listed herein, permanent outdoor illumination for active recreational and sports facilities accessory to public, private, and parochial schools, universities and colleges and for passive non-recreational nighttime events shall be permitted when approved as a conditional use by the Westtown Township Board of Supervisors.

5. §170-1514.D.5.c – An annual permit application shall be required to be submitted to the Township 45 days before the start of each sports and recreation year that a permanent recreational and sports lighting installation is proposed to be utilized pursuant to the terms in the Township codified ordinance.

MT Update: *We anticipate the applicant will not object to this code requirement.*

6. §170-1514.D.5.e.2 – The maximum mounting height, as measured from the finished grade of the playing field to the top of the highest fixture of recreational and sports lighting fixtures, permitted by this subsection is 70 ft. Per §170-1514.D.5.e.3, higher mounting heights for football, lacrosse and soccer, not to exceed 85 feet under any circumstances, may be considered by conditional use application when it can be demonstrated to the satisfaction of the Township that the higher mounting height is essential to meet or exceed the other requirements of this section while still controlling off-site glare, light trespass and daytime visibility of the light fixtures as viewed from off site. The Applicant has proposed 80 foot tall mounting heights. We defer to the Township’s Lighting Consultant in regard to if the 80 foot tall mounting heights are justified.

MT Update: *We anticipate the applicant will provide the justification for the 80 foot tall mounting height via the Conditional Use process.*

7. §170-1514.D.5.e.5.a – For a recreational or athletic sporting event, such as football, soccer, field hockey, or lacrosse, or marching band cavalcade, the sports lighting system may only be energized in conjunction with any of the following events, and no others: An event directly related to and under the control of the educational or sports program of the school, university or college where the lights are located; **no private organizations may use the school, university or college facility for lighted events.** The applicant indicated that outside community organization would be permitted to utilize the athletic fields. It appears that a condition of approval is required to permit outside community organizations utilize the athletic fields.

MT Update: *We anticipate the applicant will provide the justification for any non-code compliant conditions during the Conditional Use process.*

8. §170-1514.D.5.e.6.a – A maximum of 20 lighted events per calendar year will be permitted on any one campus where permanent lighting is provided. Up to three additional lighted events

shall be permitted each year for playoffs or championship games not part of a regular schedule of events. The applicant shall clarify the anticipated use of the nighttime field lighting. The original proposal was for 258 nights of lighting which has been reduced to 240 per the 9/28/2018 Westtown School cover letter.

MT Update: *We anticipate the applicant will provide the justification for any non-code compliant conditions during the Conditional Use process.*

9. **§170-1514.D.5.e.15** – If a sound amplification system will be used in conjunction with nighttime events permitted by this Subsection D.5 and 6, the institution shall provide a fully distributed sound system consisting of highly directional speakers in close proximity to and aimed into the seating area providing uniform coverage throughout the seating. Speakers must be selected to minimize amplification outside of the seating areas. Coverage across the playing field, if necessary, can be provided using a similar distributed system approach. The system design and performance will be subject to review and approval by the Township's engineers/consultants before permanent operation is authorized. The Applicant shall provide additional information in regard to the proposed sound amplification system, as applicable.

MT Update: *We anticipate the applicant will provide the justification for any non-code compliant conditions during the Conditional Use process.*

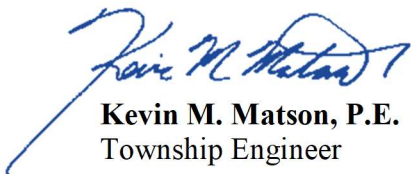
GENERAL

10. The central numeric statistics should be clarified, finalized and documented in tabular form on the Conditional Use Plan, instead found within various locations with the documentation of the whole conditional use application. For example, the number of lighting nights, the number of parking spaces, and the specific height, type, style and color temperature of the lighting fixtures.

MT Update: *The applicant has not yet updated the plan set.*

I trust that the foregoing will assist Westtown Township in their evaluation of the proposed Conditional Use Application. Please feel free to contact me directly with questions or concerns by email at kmmatson@mccormicktaylor.com or by phone at 610-640-3500.

Regards,



Kevin M. Matson, P.E.
Township Engineer

CC: Robert Pingar, P.E., Westtown Township (rpingar@westtown.org) – Township Manager & Director of Engineering
Patrick M. McKenna, Esq., Gawthrop Greenwood, PC (pmckenna@gawthrop.com) – Township Solicitor
Albert P. Federico, P.E., PTOE (albert@federico-consulting.com) – Township Traffic Consultant
William Malin, P.E., Carroll Engineering Co. (bmalin@carrollengineering.com) – Township's Sanitary Consultant
Andrew Parker, P.E., PTOE, McCormick Taylor, Inc. (ajparker@mccormicktaylor.com) – Township Traffic Engineer