



January 31, 2017

Mr. Chris Patriarca, AICP
Zoning Officer
Westtown Township
1039 Wilmington Pike
West Chester, PA 19382

**RE: Conditional Use Application for Crebilly Tract Development
McCormick Taylor review letter dated 12/9/16
Parcels 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, 67-4-32, 67-4-33, 67-4-33.1 and 67-4-134
501 West Street Road, West Chester, Chester County, PA
Toll PA XVIII, L.P.**

Dear Mr. Patriarca:

On behalf of the applicant please accept for review the enclosed Crebilly Tract Development: Conditional Use Subdivision Plans, Prepared by ESE Consultants, dated October 7, 2016, last revised December 8, 2016.

The Crebilly Farm Property in Westtown Township, PA comprises a \pm 322.4 acre tract located in the A/C Agricultural / Cluster District with a Flexible Development Option. The product mix is 200 single family, 117 single family attached (carriage homes), and 2 existing dwellings to remain. The development also proposes existing barns and buildings to remain and to be converted into community centers with –yet to be determined- outdoor recreational facilities, and common open space. It is located on the southern corners of West Pleasant Grove Road and Wilmington Pike (S.R. 202), and bounded on the south west by South New Street, and Street Road (S.R. 926) on the south west.

The response letter includes responses to the December 9, 2016 letter from McCormick Taylor below:

ZONING

1. §170-904.E.1.a – The maximum net residential density for permitted multifamily areas within the Flexible Development shall not exceed 10 dwelling units per acre of tract area designated for such use. The applicant shall provide a table depicting the density calculation for the proposed townhouses.

Response: The net residential density area is 107.5 ac. This area excludes the acreage set aside for common open space rights-of-way of public streets from the overall site area of 322.36 ac. The 117 townhome area of the site is roughly 17.5 ac. The 117 units over the 17.5 ac portion of the net residential density area would give a 6.7 dwelling units per acre and complies.

2. §170-904.E.1.c – The maximum net residential density for permitted single-family detached areas within the Flexible Development shall not exceed four (4) units per acre of tract area designated for such use. The applicant shall provide a table depicting the density calculation for the proposed single-family dwelling units.

Response: The net residential density area is 107.5 ac. This area excludes the acreage set aside for common open space rights-of-way of public streets from the overall site area of 322.36 ac. The 200 single family detached home area of the site is roughly 90.0 ac. The 200 lots over the 90 ac portion of the net residential density area would give a 2.2 dwelling units per acre and complies.

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EXHIBIT A11

3. §170-904.E.1.d – The acreage set aside for common open space rights-of-way of public streets shall not be used for computation of net residential density for any residential use.

Response: *In the previous review comments the acreage set aside for common open space rights-of-way of public streets was not used for computation of net residential density for any residential use.*

4. §170-904.E.2.c – Not more than 45% of the gross area of the tract shall be covered by impervious surfaces.

Response: *As this is under the multifamily section (170-904.E.2), if only the areas representative (including openspace) of townhome were used, this area would be under the 45% impervious surface. The townhouse gross area is +/- 35 ac and is proposed to have 13.2 ac of impervious surface (4.3 ac of road impervious + 3,300 sf of impervious per 117 townhomes). This would yield an impervious surface of 37%. The note for this requirement maximum is on plansheet 5 of the planset.*

5. §170-904.E.2.d.2.b – Parking for each dwelling unit shall be provided either at the rear of the unit or shall be grouped into one or more parking areas serving a number of dwelling units.

Response: *This appears to be intended for multi-story apartment buildings and should not apply to townhomes. The applicant believes the plan complies with the intent of the zoning ordinance as this section continues with “Individual curb cuts shall be permitted only for access to garages contained in units”. The proposed 2 parking spaces in the driveway and additional area in the 2 car garage (0.5 space each) will meet the requirement of 2.5 spaces. A detail of the possible parking configuration is added to plans 44E.*

6. §170-904.E.5 – To create architectural interest in the layout and character of housing fronting streets, variations in building line shall be encouraged.

Response: *The applicant has noted the request and will take into consideration during the development of the subdivision plans.*

7. §170-904.E.7 – Building height shall be limited to three stories not to exceed 38 feet.

Response: *The requirements of this section have been added to plan 4B and will comply with the height requirements in land development.*

8. §170-904.E.10.a – No structure shall be within 30 feet of the curb of access roads.

Response: *The plans do not have structures within 30’ of the curb.*

9. §170-905.A.1.j – As part of the application for conditional use approval of any flexible development, the applicant shall prepare and submit to the Township a site analysis which identifies the historic resources, including structures, ruins, sites, traces, and relationship to the bounds of any National Register historic district.

Response: *A historic and physical description of structures report was submitted to the Township by RGA cultural resource consultants and is dated December 13, 2016.*

10. §170-905.A.3 – The applicant has provided a Stormwater Management Narrative (Feasibility Report) for the proposed project. Although the stormwater system proposed demonstrates the ability to provide stormwater management, we caution that the system may warrant reconsideration during the land development process to incorporate a more multi-structured system of stormwater management by adopting more non-structural and structural design concepts as outlined in the PA Best Management Practices Manual.

Response: No response required. The stormwater system will be fully designed and permitted in land development.

11. §170-905.A.3 – The Stormwater Management Narrative (Feasibility Report) references the Darby-Crum Creek Watershed. The Act 167 Plan for Westtown in this area contains drainage areas to the Brandywine Creek (noted in the report) and the overlay of Chester Creek Watershed’s drainage panels 32 and 33. Development in the Chester Creek watershed must comply with the 50% reduction standards outlined in the Act 167 Plan.

Response: The stormwater report is attached and updated to reference the Chester Creek. The point of interest C1 (which drains to the Chester Creek), has the required reduction of the 50% of the pre development flows.

12. §170-905.A.3 – Although the stormwater planning is generally conceptual, a more detailed plan for the area of the townhouses along Route 202 must be provided.

Response: The stormwater design calculations show some of the open space of the townhouse area flowing toward the Route 202 endwall and provide the reduction in flow. This may need to be slightly adjusted when the land development plans are designed, but the reduction requirement will still be upheld.

13. §170-905.A.3 – In the conditional use phase of this project, the feasibility of access to each of the basins must be demonstrated. If additional open space areas or easements are required, they should be added to the plan prior to the full subdivision-land development application.

Response: The basin access will be taken from the closest road to the basins and be graded to allow vehicle access. There is ample area in the 197.15 ac open space provided (193.41 ac required) to be adjusted to accommodate the basin accesses.

14. §170-905.A.5 – An erosion and sedimentation control plan shall be filed and implemented in accordance with the regulations of the Pennsylvania Department of Environmental Protection and the requirements of Chapter 149, Subdivision and Land Development.

Response: No response required. The erosion control system will be fully designed and permitted in land development.

15. §170-905.D – Signs, as required by Article XVIII. The applicant should indicate if a sign is being proposed and provide all associated information on the plan.

Response: No response required. The signs will be fully designed and permitted in land development.

16. §170-905.E – Lighting, as required by §170-1514. The applicant should provide a lighting plan for review with the next submission.

Response: A lighting design, by Philips, has been included with this letter.

17. §170-905.G – Screening, as required by §170-1508. The applicant should be in conformance with this section.

Response: The plans show the screening on plans 44A – 44E.

18. §170-907.A.2 – Within the required acreage of open space, or elsewhere on the tract, an area equivalent to at least 10% of the net tract acreage shall be suitable and available to serve the particular recreational needs of the residents of

the development. The Board may require that all, or a portion of, this recreational area be suitable for active recreation, and may further require that such area be prepared and developed for such purposes.

Response: The requirement of the 10% net tract areas are shown on page 4D.

19. §170-907.A.3 – Where applicable or deemed appropriate or contained in the Township's Comprehensive Plan or Parks, Recreation and Open Space Plan, provision for pedestrian trails for public and/or private use shall be provided. This provision need not be in addition to the 10% requirement of Subsection A(2) above unless the Board determines that the entire 10% minimum must be designated for active recreation.

Response: The requirement of the 10% net tract areas are shown on plansheet 4D. Pedestrian trails have been provided.

20. §170-907.A.7.b – The area of common open space shall be interconnected with common open space areas on abutting parcels wherever possible, including provisions for pedestrian pathways for general public use to create linked pathway systems within the Township.

Response: The requirement of the 10% net tract areas are shown on plansheet 4D. The Road L sidewalk is adjacent to the existing trail on the north side of West Pleasant Grove Road.

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.

Response: No response required.

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.

Response: The applicant will provide the Township the HOA documents during the land development process.

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.

Response: Will comply.

24. §170-1617.C.1.a – The wetlands shall be based upon a professional analysis, with identification of the individual who completed such analysis in accordance with § 170-401B of this chapter. The applicant shall provide the curriculum vitae of the proposed wetland consultant.

Response: The wetlands JD application will be submitted to the ACOE shortly. We will send you the information upon completion.

25. §170-1617.C.4 – An efficient street layout shall be designed to serve the appropriate building sites. Trails should also be considered to link together common open spaces such as the existing Thornbury Trail, clusters of homes and other destinations (i.e. nearby stores, parks and schools). Building sites should be clustered together to minimize expensive wetland and creek crossings by roads.

Response: The layout of the streets and trails is shown on plan 4C and is designed to address the above section.

26. §170-1705.A.3 – Townhouses, apartments, and similar multifamily dwellings shall provide 2.5 parking spaces per dwelling unit, 0.5 spaces of which may be located in convenient overflow areas for guests. The applicant has not provided a location for overflow parking for the proposed townhouses.

Response: The proposed 2 parking spaces in the driveway and additional area in the 2 car garage (0.5 space each), which provides 3 spaces and will meet the requirement of 2.5 spaces. A detail of the possible parking configuration is added to plansheet 44E.

27. 170-2009.B.6.e – Strong consideration shall be given to incorporation of LEED (Leadership in Energy and Environmental Design) certified building design principals recommended by the US Green Building Council.

Response: No response required.

28. §170-2009.D.1.b – The proposal shall be consistent with the Township Comprehensive Plan and with the purpose of this chapter to promote the public health, safety, and general welfare.

Response: The plan is in compliance with the above section, where applicable.

29. §170-2009.D.1.f – The demand created by the proposed use upon public services and facilities such as water supply, sewage disposal, police and fire protection, emergency services, open space and recreation facilities, and the public school system has been considered and, where necessary, adequate arrangements for expansion or improvement are assured.

Response: The applicant complies. See fiscal impact analysis from David C. Babbitt & Associates, dated October 13, 2016.

GENERAL COMMENTS

30. The applicant shall provide background information and assumptions for the preparation of the Existing Conditions Plan which resulted in the “net” tract area, specifically:

- a. Has the applicant submitted the outbound deed and legal descriptions for the tract?

Response: The applicant has enclosed the outbound deed with this letter. The legal description will be forwarded, when obtained.

- b. Were the floodplains areas “Zone X” of Tributaries 2 and 3 of Radley Run subtracted from the gross tract area to develop the net tract area? An interpretation from the Solicitor or Special Counsel may be required if these areas are “Floodplain.”

Response: The areas for the floodplain “Zone X” (500 year floodplain) of tributaries 2 and 3 were not subtracted as part of the floodplain area. Only the area for “Zone A” (100 year floodplain) was deducted.

- c. Were the floodplain boundaries mapped directly from the FEMA maps, or were they adjusted to the field survey prepared by ESE?

Response: The floodplain mapping was shown directly from the FEMA maps. The referenced map is called out on page 2 of the plans.

- d. Were the wetlands confirmed in the field by the Army Corp of Engineers for accuracy and validity? When was the wetland survey and subsequent survey by a Professional Land Surveyor performed?

Response: The wetlands survey and survey collection was performed in July 2016 (noted on page 2 of the plans). The field determination with the ACOE has not been performed up to this point.

- e. Were the steep slope area delineations performed by computer aided software or by draftsman interpretation?

Response: The steep slope areas (15% to 25% and 25% or greater) have been computer generated and adjusted for the slope requirements (6' distance over 50') of the ordinance by a draftsman.

- f. Was the overall topographic survey for the site performed via aerial or land survey?

Response: The overall topographic survey was performed via aerial mapping. Additional field survey shots were taken to verify the accuracy of the information.

31. The applicant should consider redesigning the system of roads to continue fluidity and connectivity throughout the development and reduce the use of cul-de-sacs.

Response: The above comment is noted and will discuss during the land development.

32. To continue the integrity of the existing road, improvements to South New Street and West Pleasant Grove Road shall be required during the development.

Response: The traffic impact study has the revised recommendations in the report for the improvements on the impacted roadways.

33. The applicant shall coordinate with the Township Engineer during land development to select the vegetation and landscaping that will best assist the Township to reach the goals and requirements of the PADEP MS4 Program. Such provisions will address concerns regarding water quality such as phosphorous reduction in the watersheds.

Response: Noted.

34. The applicant should revise the plans to provide a table of all proposed items to be offered for dedication to the Township and all items to be owned and maintained by the proposed homeowners association.

Response: The roads are to be dedicated to the Township, the water to the utility authority, and the sewer to the Township. The remaining items will be owned and maintained by the HOA. This table will be clearer during the land development process and will be added to the plans.

35. The applicant should revise the plans to provide the total mileage as well as future ownership and maintenance responsibilities of the proposed roadways.

Response: The roads are to be dedicated to the Township, the water to the utility authority, and the sewer to the Township. The remaining items will be owned and maintained by the HOA. This table will be clearer during the land development process and will be added to the plans.

36. The applicant should revise the plans to provide cross-sections for the proposed roadways.

Response: The cross section detail will be added during the land development process.

37. The applicant should revise the layout of the proposed Amenity Center, pool and tennis courts to consolidate the accesses and provide an improved flow of the area.

Response: Noted. Final design will be done during the land development process.

38. The applicant should verify with the Township the status of approval of the lot consolidation application for parcels 67-4-30, 67-4-31, 67-4-32, 67-4-33 and 67-4-33.1.

Response: The consolidation is completed and has been recorded on Docket 1147469, book 19877, page 1. The plans are attached for your reference.

39. The applicant should ensure the total number of dwellings is consistent throughout the application (i.e. plans, stormwater report, addendum).

Response: The applicant has verified the numbers thru the application, as the numbers for the site will be 317 new homes and 2 existing.

40. The applicant should provide proposed scenic view renderings situated from the Westminster Presbyterian Church and Moscharis Vasilios locations.

Response: The applicant has submitted the renderings.

41. The applicant should indicate on the plans if the project intends to be developed in stages or constructed in one phase.

Response: Not required for conditional use and phases will be done during land development.

42. The applicant must address all concerns expressed by the Police Chief.

Response: No action required at this time.

43. The applicant must address all concerns expressed by the West Chester Fire Chief.

Response: The applicant will address the review by the Fire Chief, once obtained.

44. Although not specifically cited in the Township ordinance, the applicant should consider offering area and bulk restrictions for each individual lot to prevent future undesirable building or accessory use layouts from potential site improvements (i.e., building renovations, additions or accessory buildings).

Response: No action required.

45. Although not specifically cited in the Township ordinance, the applicant should consider offering caps in percentage form for the impervious coverages of the individual lots. This would preserve the “green area” of the future lots, and help to preserve the aesthetics and character of the development. At a minimum, the applicant should consider a design caps on impervious coverage beyond which a future homeowner may have to provided individual stormwater attenuation on his/her lot.

Response: No action required at this time.

46. The applicant must acknowledge that every effort will be made to balance the cuts and fills at the site, to avoid the unnecessary import or export of soils during construction.

Response: The design will try to balance the site as close as possible to limit the earthwork.

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

Response: Aqua PA confirmed availability of water by relying on a prior letter dated October 23, 2013.

Resubmission:

- PDF plans, sheets 1 – 4D, 5 - 23, and 44A – 45 of 45, of residential subdivision dated 10/7/16 and last revised 12/8/16, prepared by ESE Consultants Inc.
- PDF plans, “Overall Boundary Survey” sheets 1 – 5 of 5, dated 8/22/16 and last revised 10/3/16, prepared by TWT Consultants.
- PDF partial report of Stormwater Narrative last revised December 2016, prepared by ESE Consultants Inc.
- PDF plans, sheets 1 – 5 of 5, “Westtown Residential Development” dated 12/20/2016 and last revised 12/28/2016, prepared by Philips Lighting.
- PDF plans, “Preliminary/Final Subdivision & Lot Consolidation Plan” sheets 1 to 8 of 8, dated 8/19/2015 and last revised 10/16/2015, prepared by T&M Associates.

Thank you for your attention and anticipated cooperation in regard to the above. Should you have any questions, comments, or require additional information please contact me at your convenience.

Sincerely,
ESE CONSULTANTS, INC.

Jeff Madden, PE
Senior Project Engineer

cc: