



**KRISTIN S. CAMP**  
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118 W. Market Street, Suite 300  
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June 18, 2019

**VIA HAND DELIVERY**

Will Ethridge  
Zoning Officer  
WESTTOWN TOWNSHIP  
1039 Wilmington Pike  
West Chester, PA 19382

Re: Zoning Application for Gaudenzia, Inc.- 1030 S. Concord Road

Dear Will:

On behalf of our client, Gaudenzia, Inc., the owner of the property at 1030 S. Concord Road, we submit the enclosed application to the Zoning Hearing Board and the filing fee of \$850.00.

I will contact you to coordinate the hearing date and to confirm if it will be necessary for us to attend a Planning Commission meeting for a recommendation on the application.

Thank you for your cooperation.

Very truly yours,

*Kristin S. Camp*

Kristin S. Camp

KSC/akf  
Enclosure

cc: w/encl.; via email  
David Slinger, Gaudenzia Inc.  
Theodore J. Gacomis, P.E.

# Westtown Township

## Zoning Hearing Board Application

PO Box 79  
Westtown, PA 19395



P: 610.692.1930  
F: 610.692.9651  
www.westtownpa.org

### Township Use Only

Date Received: 6-18-19 Date Accepted: 6/21/19  
Project No.: 2019-07 Fee/Date Paid: 850<sup>00</sup>  
Parcel No.: 67-4-47.1 Acreage of Property: 10.8  
Zoning Dist. R-1

### Applicant & Owner Information

Property Owner Gaudenzia, Inc. Phone 610-239-9600  
Mailing Address 39 East School House Lane City Philadelphia PA Zip 19144  
E-mail dslinger@gaudenzia.org

Applicant Gaudenzia, Inc. Phone 610-239-9600  
Mailing Address 39 East School House Lane City Philadelphia PA Zip 19144  
E-mail dslinger@gaudenzia.org

### Request

Section 2104: Appeals from the Zoning Officer \_\_\_\_\_

Section 2105: Challenge to the validity of the  
Zoning Ordinance or Map \_\_\_\_\_

Section 2106: Challenge to the Flexible  
Development Procedure \_\_\_\_\_

Section 2107: Variances \_\_\_\_\_

Section 2108: Special Exceptions X - See attached narrative



Applicant shall deposit with the Township a fee deemed sufficient to pay the Hearing expenses. These costs may include compensation for the secretary and members of the Zoning Hearing Board, notice and advertising costs, and necessary administrative overhead connected with the Hearing. Funds deposited in excess of the actual cost of the requested hearing shall be returned to the applicant upon completion of the proceedings.

In the event that the costs of the hearing exceed the funds deposited, the Applicant shall pay to the Township funds equal to such excess costs within thirty (30) days of the Township's request. Failure to deposit the additional funds shall be just reasons for terminating the proceedings.

It is my understanding that the Zoning Officer and Zoning Hearing Board may request additional information and documentation to prepare for said hearing.

**CERTIFICATION: I certify that the information presented in this application and all attachments is true and correct.**

Signature of APPLICANT Kristin S. Camp Date 6/7/2019

Print Name Kristin S. Camp, Esquire - Attorney for Applicant

Signature of OWNER \_\_\_\_\_ Date \_\_\_\_\_  
(If different from applicant)

Signature of ZONING OFFICER Will C. [Signature] Date 6/21/19

OFFICIAL USE ONLY

Mailed/faxed to Zoning Solicitor on: 6-21-19

Hearing scheduled on: \_\_\_\_\_ Advertised on: \_\_\_\_\_

FEE SCHEDULE

- Variance, Special Exception — \$850
- Appeal from the Zoning Officer, Challenge to the Flex Development Procedure — \$850
- Challenge to the Zoning Ordinance/Map — \$2,500



**BUCKLEY, BRION,  
McGUIRE & MORRIS LLP**  
By: KRISTIN S. CAMP, ESQUIRE  
Attorney I.D. No. 74593  
118 W. Market Street, Suite 300  
West Chester, Pennsylvania 19382  
(610) 436-4400

**ATTORNEY FOR APPLICANTS**

GAUDENZIA, INC. : BEFORE THE ZONING HEARING BOARD  
: OF WESTTOWN TOWNSHIP

**SUPPLEMENT TO WESTTOWN TOWNSHIP  
ZONING HEARING BOARD APPLICATION**

Applicant, Gaudenzia, Inc. ( "Applicant"), by and through its attorneys, Kristin S. Camp, Esquire and Buckley, Brion, McGuire & Morris LLP, hereby submits this Supplement to the Zoning Hearing Board Application (the "Application") filed with the Zoning Hearing Board of Westtown Township, Chester County, Pennsylvania (the "Board"), and in support thereof, state as follows:

1. Applicant is a non-profit organization and the owner of a 10.8-acre parcel of property located at 1030 S. Concord Road, West Chester, Pennsylvania 19382 in Westtown Township which parcel is identified as Chester County Tax Parcel No. 67-4-47.1-E (the "Property"). The deed for the Property is attached hereto as Exhibit "A" and an aerial tax map of the Property is attached hereto as Exhibit "B".

2. The Property is located in the Township's ~~Township Zoning District~~ <sup>R-1</sup>

3. The Property is improved with five separate buildings which are used for a drug and alcohol residential rehabilitation treatment center (the "Existing Use").

4. The existing condition of the Property contains a total of 97,578 square feet of impervious cover which includes the following:

- o 25,593 square feet in existing buildings

- o10,544 square feet in walkways and patios

- o61,441 square feet in driveways

5. The Existing Use of the Property is a lawful nonconforming use which commenced on or about 1970 when the Property was zoned R-1 Residential.

6. Applicant seeks to build a new 325 square foot walk-in freezer/cooler unit built on a 540 square foot concrete pad to provide refrigeration and a freezer for the food that it serves in its residential facilities. The new freezer/cooler will be located behind the West Chester House on the Property which is the main building on the Property that is used for residential substance abuse treatment.

7. Applicant also seeks to build an ADA compliant sidewalk and ramp containing 550 square feet from the West Chester Home to the new freezer/cooler unit.

8. A plan which depicts the proposed concrete pad, freezer/cooler unit and walkways prepared by Edward B. Walsh & Associates, Inc. titled, "Walk In Freezer permit Plan for Gaudenzia" dated January 3, 2019, last revised June 5, 2019 is attached hereto as Exhibit "C".

9. A plan which generally depicts the existing buildings, driveways, walkways, patios and the proposed concrete pad, freezer/cooler unit and new walkway prepared by Edward B. Walsh & Associates, Inc. titled, "Walk In Freezer Permit Plan for Gaudenzia" dated January 3, 2019, last revised June 5, 2019 is attached hereto as Exhibit "D".

10. In order to construct the proposed freezer/cooler, Applicant requires a special exception pursuant to Section 170-1901.B(3) of the Westtown Township Zoning Ordinance (the "Ordinance") which allows a conforming structure housing a nonconforming use to be expanded upon the lot which it occupied at the effective date of

the Ordinance (which would be May 2, 2005 for Section 170-1901) up to a maximum expansion equal to 25% of the building area of the subject structure as it existed upon the effective date of the Ordinance (again which would be May 2, 2005) when authorized as a special exception by the Zoning Hearing Board.

11. The proposed expansion of the existing building is equal to a 14.2% expansion which complies with Section 170-1901.B(3) of the Ordinance.

12. The extended building will continue to conform in all respects to the standards applicable within the Township District in which the building is located.

13. At the zoning hearing, Applicant shall demonstrate that if the special exception is granted by the Zoning Hearing Board, there will not be any adverse impact to the public health, safety or general welfare.

**WHEREFORE**, Applicant respectfully requests that the Board schedule and hold a hearing with respect to this Application in conformity with the provisions of the Pennsylvania Municipalities Planning Code, 53 P.S. §10101 *et seq.* and the Ordinance, and grant the variance relief requested, as outlined above.

Respectfully submitted,

**BUCKLEY, BRION,  
McGUIRE & MORRIS LLP**

Date: June 14, 2019

By:

  
\_\_\_\_\_  
KRISTIN S. CAMP, ESQUIRE

*Attorneys for Applicant*