



THE COUNTY OF CHESTER



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January 6, 2021

Jon Altshul, Manager
Westtown Township
1039 Wilmington Pike
West Chester, PA 19382

Re: Sketch Plan - Stokes Property
Westtown Township – SD-12-20-16556

Dear Mr. Altshul:

An unofficial Sketch Plan entitled "Stokes Property", prepared by D.L. Howell and Associates, Inc., and dated November 10, 2020, was received by this office on December 9, 2020. Although our review is not required by Act 247, the Pennsylvania Municipalities Planning Code (MPC) as amended, our comments are offered as a planning service at the request of Westtown Township. This review focuses primarily upon design and procedural-related issues and concerns to assist the applicant and Westtown Township in its review of this proposal prior to the official submission. This review does not replace the need for an official referral by Westtown Township of a preliminary or final plan, as required by the Pennsylvania Municipalities Planning Code.

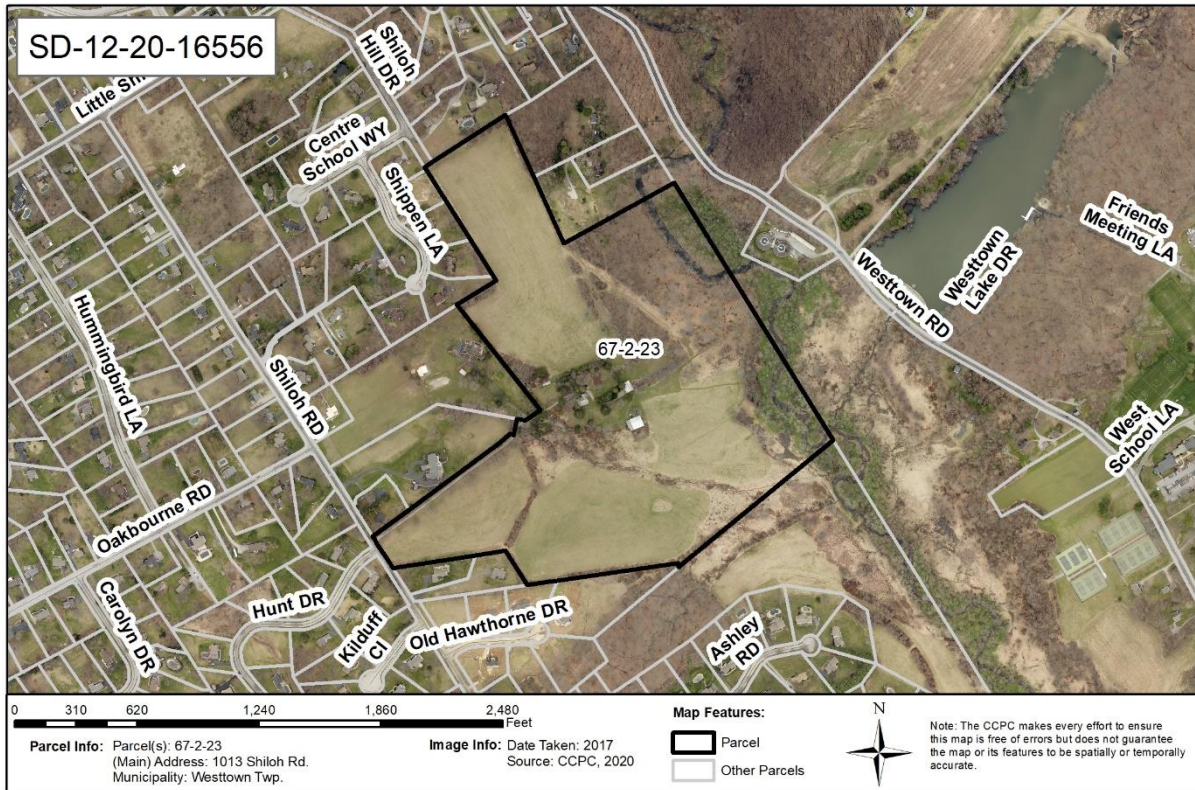
PROJECT SUMMARY:

Location:	east side of Shiloh Road, south of Little Shiloh Road
Site Acreage:	65.10
Lots/Units:	62 Lots
Non-Res. Square Footage:	0
Proposed Land Use:	Single Family Residential
New Parking Spaces:	0
Municipal Land Use Plan Designation:	Open Space, adjoining Neighborhood Conservation
UPI#:	67-2-23

PROPOSAL:

The applicant proposes the creation of 62 residential lots, and 35.97 acres of open space. The existing dwelling and accessory building will remain on Lot 62. The project site will be served by public water and public sewer; it is our understanding that the proposed sewer service will require an amendment to the Township's Act 537 Plan. The project site is located in the R-1 Residential zoning district, and is being developed under the standards in Article IX-Flexible Development Procedure of the Township Zoning Ordinance.

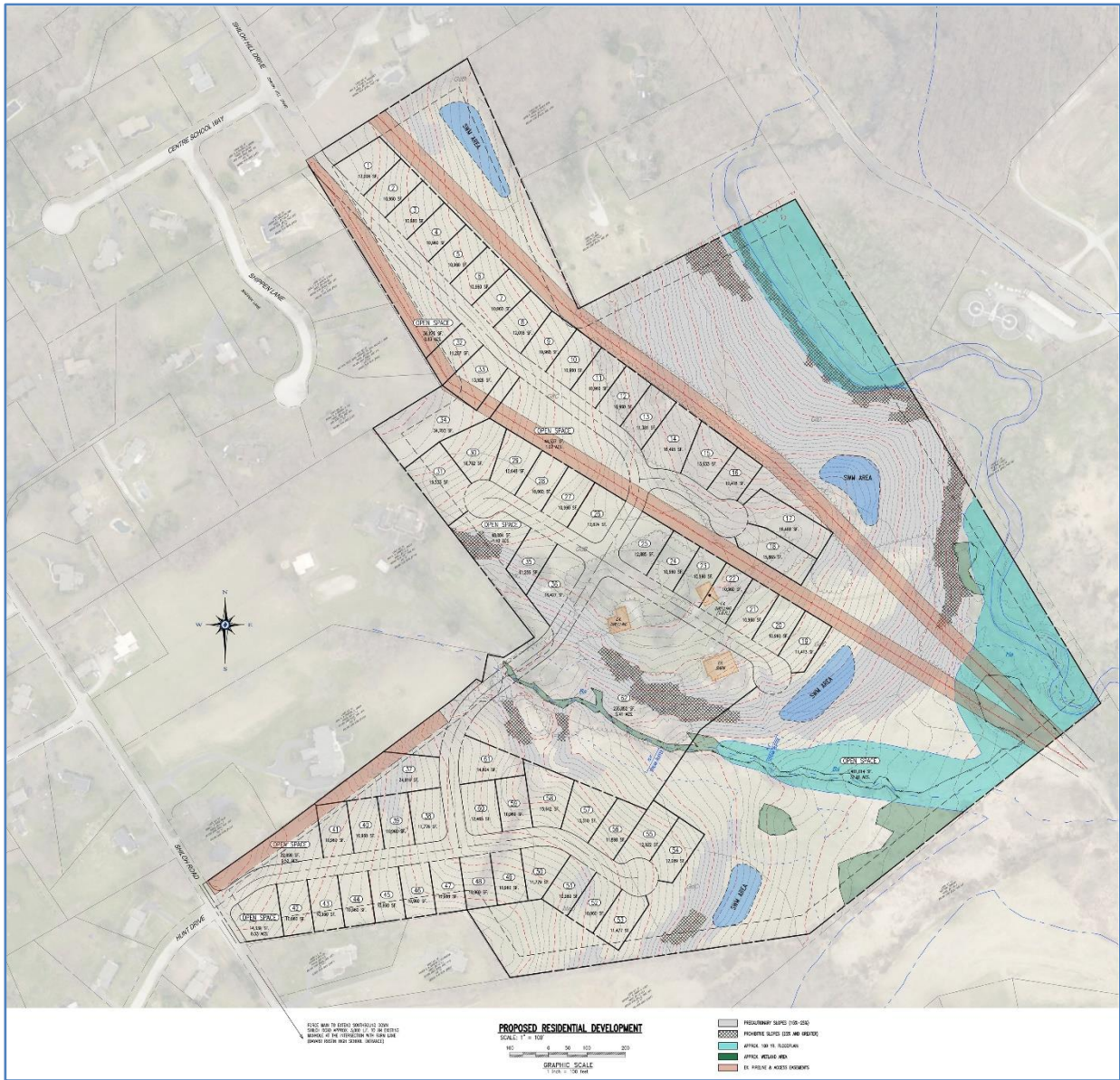
RECOMMENDATION: The County Planning Commission recommends that the issues raised in this letter be addressed, particularly the alternative sketch plan options discussed in comment #8, and all Township issues should be resolved before action is taken on this plan.



LANDSCAPES:

1. The project site is located within the **Suburban Landscape** and **Natural Landscape** designations of [Landscapes3](#), the 2018 County Comprehensive Plan. 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. 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. While single family residential development in accordance with the Township's Flexible Development Procedure standards is an appropriate use in a **Suburban Landscape designation**, careful consideration of any development activity on this site is required due to existing physical and environmental constraints, particularly the transmission pipelines that traverse the central portion of the site.

Additionally, the Future Land Use map in the Township's 2019 Comprehensive Plan indicates that the project is located in an Open Space category, adjoining a Neighborhood Conservation category to the north and to the west. It is identified on page 11-11 of the Township Comprehensive Plan that the key issues for open space are: permanency of open space; economic viability of private open space; sustainable use of open space; and interconnection of open spaces. The key issues for Neighborhood Conservation category, as noted on page 11-8 and 11-9, include the following: provision for pedestrian and bicycle interconnections; open space access; and historic preservation.



Sketch Plan Detail – Stokes Property

Design Issues:

- Our copy of the Township Historic Resources Map indicates that the site contains a Class 2 historic resource, and we acknowledge and endorse that the density calculation table indicates that the applicant is requesting a bonus density for the restoration/rehabilitation of the historic resource. The Township should reserve granting final plan approval until the proposal has been reviewed by the Township’s Historical Commission. “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/Landscapes3/1c-Appreciate.cfm.

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3. The project site is traversed by two hazardous liquid transmission pipelines. Applicants should be aware that the actual location of the pipeline may not always be within the center of the easement or right-of-way. To minimize risks before and during construction, the project designer should contact the Pennsylvania One Call Center at 811 or <http://www.pa1call.org/pa811>, consistent with the provisions of Section 4(2) of Act 287 (Underground Utility Protection Act), prior to finalizing the design. The PA One Call Center should also be contacted at least 3 business days, but not more than 10 days, prior to any excavation. More information about pipeline safety can be found at the Chester County Pipeline Information Center at: <http://www.chescoplanning.org/pic/introduction.cfm>.
4. The applicant should identify if a stop sign will be provided for the proposed entrance at the Shiloh Road/Hunt Drive intersection. Due to existing slopes, and numerous intersecting streets to the north and south, there is the potential for sight distance issues at this intersection.
5. We recommend that sidewalks be provided for this development. Sidewalks are an essential design element for new construction in the **Suburban Landscape**.
6. The Parks and Open Space map in the Township’s 2019 Comprehensive Plan indicates the project site adjoins the Plumly Farm municipal open space area to the south. We recommend that the applicant and Township incorporate trails into the design of the proposed open space, including connection(s) to the proposed trail corridor on the adjoining Plumly Farm site depicted on the Trails and Bikeways map in the Township’s Comprehensive Plan. We also recommend that the applicant and Township consider utilizing all-weather materials in the construction of all trail corridors, which will accommodate a wider variety of uses, and be handicapped-accessible.
7. We recommend that, due to the topography of the area, the applicant and Township consider providing landscaping/buffering that exceeds the minimum requirements in the Township Code. In particular, there should be significant areas of landscaping provided between the proposed development and the neighboring properties in the vicinity of Shiloh Road, the Hawthorne subdivision, and Shippen Lane.
8. Due to the existing physical and environmental constraints of the project site, we recommend that the applicant and Township consider the alternative sketch plans provided on pages 6 through 8 of this review letter. We note that all three options provide for trail corridors within the open space, which extend to the Plumly Farm municipal open space area to the south, and reduce the overall length of the proposed roadway network (approximately 4,630 linear feet in the current sketch plans submission).

Option A on page 6 depicts the proposed construction of 41 townhouse units, with no new housing near the hazardous liquid transmission pipelines. This option is the County Planning Commission’s preferred option, because it stays clear of the pipelines, maintains significant open space, and protects the spatial integrity of the existing house grounds, including views to and from the house and the alignment of the existing driveway. Option B on page 7 depicts the proposed construction of 66 residential units (15 single family and 41 townhouse units), and Option C on page 8 depicts the proposed construction of 33 single family units. Options B and C illustrate proposed development scenarios that limit new housing near the pipelines, provide more interconnected open space, protect the existing house grounds, restrain the use of cul-de-sacs, and conserve existing vegetation and cultural features, such as hedgerows.

Natural Features Protection:

9. The sketch plan indicates that the project site contains precautionary slope (15-25 percent) and prohibitive slope (25 percent and greater) areas. The Township should verify that all necessary ordinance relief measures to permit grading in steep slope areas have been granted and that the design of the slopes is consistent with all ordinance requirements related to permitted grades, the design and specifications of retaining walls and slope stabilization.
10. 2013 soils data indicates that the project site contains areas of predominantly hydric (wet) soils (Ba Baile, and Ha Hatboro) which have limitations to development. These limitations include drainage problems due to low permeability, low runoff rates and sub-surface saturation. When construction takes place on these soils, it interferes with the natural drainage of the land. If construction occurs on this site, on-site alterations to existing drainage patterns should be carefully inspected by the Township Engineer to insure that off-site drainage conditions are not negatively affected.
11. The site contains land within the 100 year flood plain. Although it does not appear that any development activity will encroach into the floodplain, we note that the County Planning Commission does not support development in the floodplain, and the Federal Emergency Management Agency and Pennsylvania Department of Environmental Protection regulate filling or development in the floodplain. Development within a floodplain can increase the magnitude and frequency of normally minor floods, and present health and safety problems.
12. The plan and 2017 aerial photography indicate that a portion of the site is wooded. Mature trees and shrubs reduce the volume and impacts of stormwater runoff by intercepting precipitation, increasing evapotranspiration, and stabilizing soil through root growth. If development or earth disturbance is going to encroach upon existing woodlands, the removal of trees should be limited to the minimum area needed for the dwellings and support facilities. The limits of tree removal should be clearly shown on the plan and “limits of disturbance” should be delineated to protect all trees that are intended to remain. Additional native trees and shrubs should be incorporated into the landscaping plans to replace and mitigate the loss of removed trees.

Agricultural Security Area:

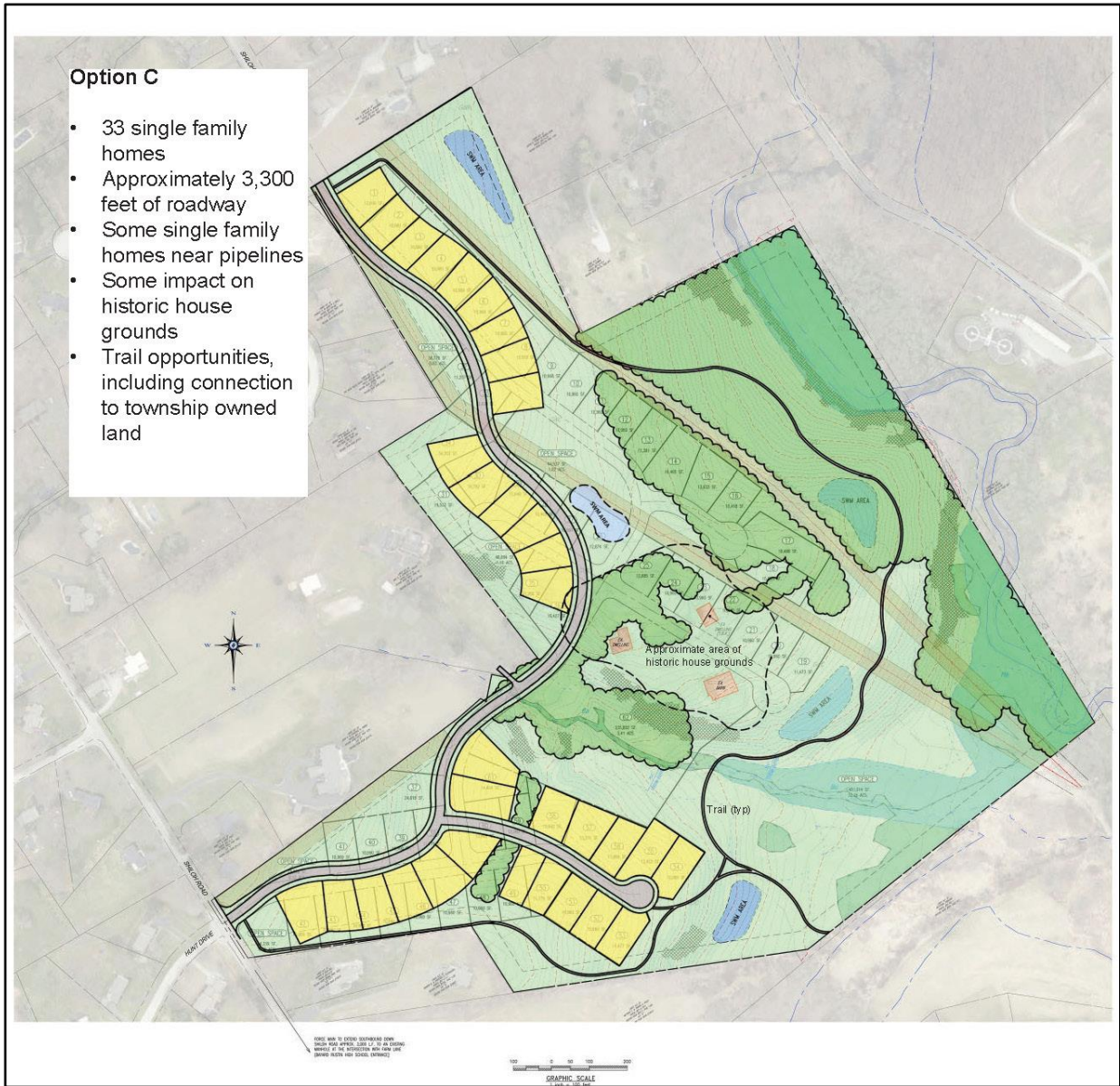
13. The site is located within an agricultural security area adopted by the Township in accordance with the Agricultural Security Area Act (Act 43). Adoption of an agricultural security area is a public policy statement for the preservation of agriculture. The proposed development does nothing to preserve agriculture which is contrary to the adopted land use policies of the Township. Before action is taken, the Township should consider how this development, and others like it, are changing the character of the Township from agricultural to residential, particularly the impact within the agriculture security area. The Township should consider how designation of agricultural security areas relates to its current zoning ordinance.



CCPC Alternative Sketch Plan – Option A
(Base drawing from sketch plan, prepared by D.L. Howell & Associates, Inc., dated 11/10/2020)



CCPC Alternative Sketch Plan – Option B
(Base drawing from sketch plan, prepared by D.L. Howell & Associates, Inc., dated 11/10/2020)



CCPC Alternative Sketch Plan – Option C
(Base drawing from sketch plan prepared by D.L. Howell & Associates, Inc., dated 11/10/2020)

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We appreciate the opportunity to be a party to the design process prior to engineering and the associated costs which may preclude design revisions. If you have any questions in regard to this review, we will be glad to discuss this project at your convenience. The County Planning Commission staff is also available to meet with the applicant and the Township to discuss this project in further detail.

Sincerely,

A handwritten signature in black ink that reads "Paul Farkas". The signature is written in a cursive style with a large initial "P".

Paul Farkas
Senior Review Planner

cc: Lucille Stokes Irrevocable Trust
D.L. Howell and Associates, Inc.