



# THE COUNTY OF CHESTER



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## PLANNING COMMISSION

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November 14, 2019

Amanda M. Cantlin, Township Manager  
East Bradford Township  
666 Copeland School Road  
West Chester, PA 19380

Re: Preliminary Subdivision - West Chester Crossing  
# East Bradford Township – SD-10-19-16098

Dear Ms. Cantlin:

A Preliminary Subdivision Plan entitled "West Chester Crossing", prepared by ESE Consultants, Inc., and dated September 27, 2019, was received by this office on October 15, 2019. This plan is reviewed by the Chester County Planning Commission in accord with the provisions of Section 502 of the Pennsylvania Municipalities Planning Code. We offer the following comments on the proposed subdivision for your consideration.

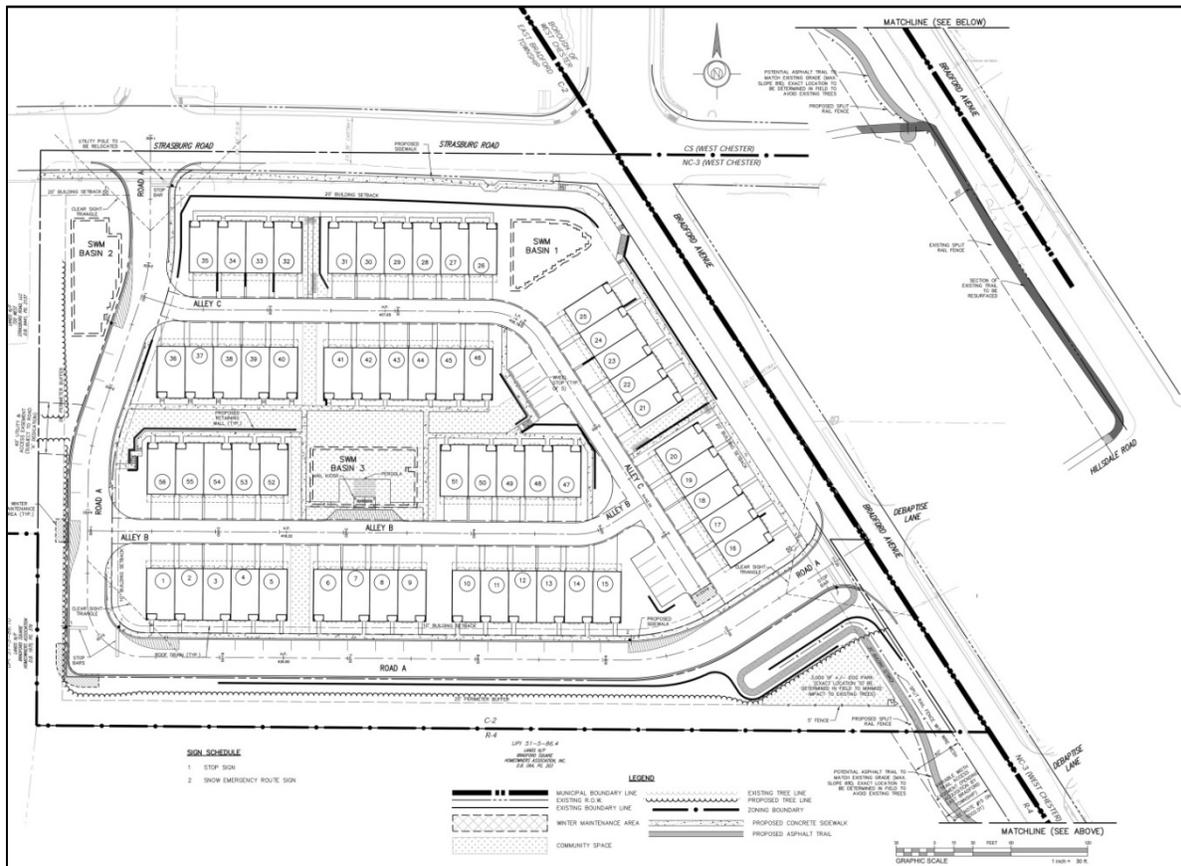
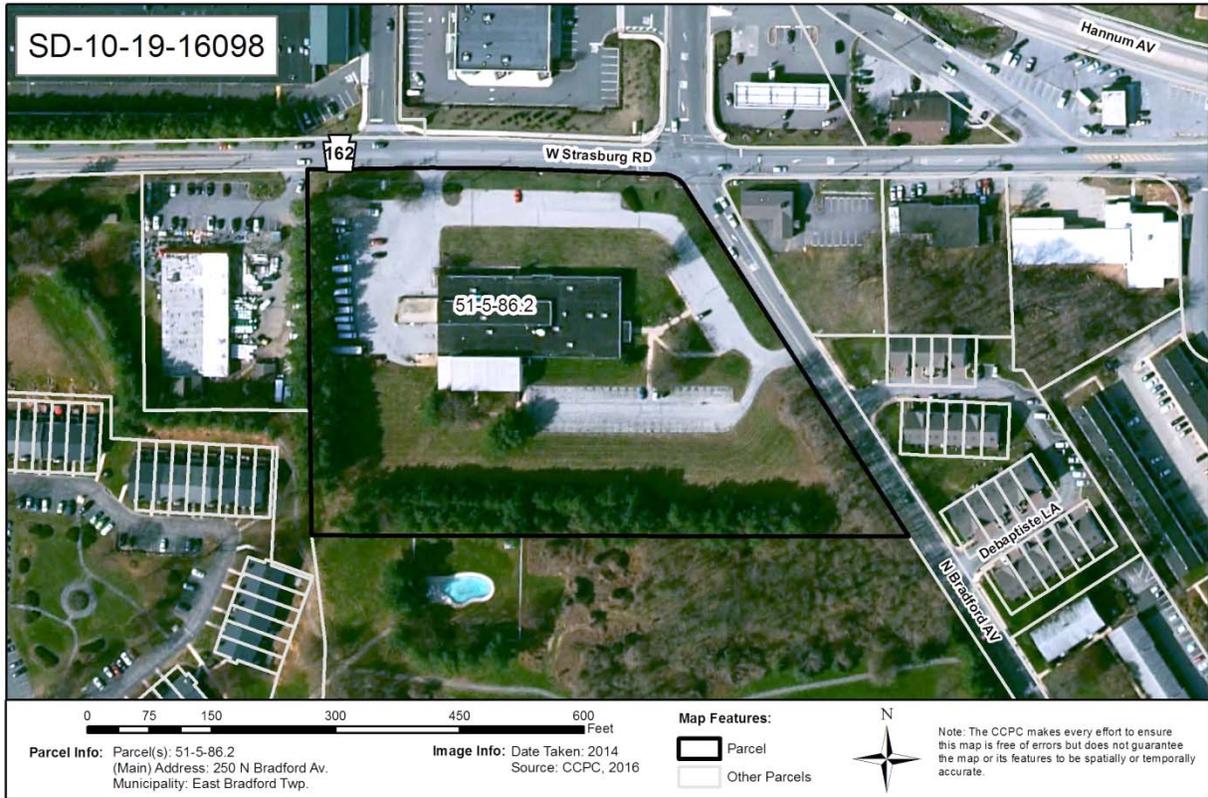
### **PROJECT SUMMARY:**

Location:	the southwest corner of West Strasburg Road (Route 162) and North Bradford Avenue
Site Acreage:	6.10
Proposed Land Use:	56 Townhouse Units
New Parking Spaces:	33
Municipal Land Use Plan Designation:	Mixed Commercial/Residential
UPI#:	51-5-86.2

### **PROPOSAL:**

The applicant proposes the creation of a 56 unit townhouse development. The existing building on the site, the former site of the Daily Local News, will be removed. Vehicular access will be provided from two full-access driveways, both of which will be aligned opposite existing off-site roads/driveways. Twenty-three (23) parallel parking spaces along the proposed road network, and ten (10) central parking spaces, will be provided. General Note 28 on Sheet 4 states that the further subdivision of any of the lots is prohibited. A plan note and the Sheet Index on Sheet 1 indicate that the Record Plans (Sheets 2 and 3), which are not included with the preliminary plan submission, will be included with the final plan submission. The project site, which will be served by public water and public sewer, is located in the C-2 Commercial and R-Residential Overlay zoning districts. A Transportation Impact Study, prepared by Traffic Planning and Design, Inc., dated October 18, 2017 and last revised September 26, 2019, was included with the plan submission. The site adjoins West Chester Borough to the east.

**RECOMMENDATION:** The County Planning Commission recommends that the issues raised in this letter should be addressed, and all Township issues should be resolved before action is taken on this subdivision plan.



Site Plan Detail, Sheet 7: Preliminary Subdivision - West Chester Crossing

BACKGROUND:

1. The County Planning Commission reviewed the draft R-Residential Overlay District standards on April 22, 2019 (CCPC# ZA-03-19-15836). According to our records, this zoning amendment was adopted by the Township on July 9, 2019.

Subsequently, the County Planning Commission reviewed an amendment to the R-Residential Overlay District standards on October 1, 2019 (CCPC# ZA-09-19-16055). According to our records, this amendment was adopted by the Township on October 8, 2019.

2. The County Planning Commission previously reviewed a conditional use application for this site, which addressed the construction of 60 townhouse units in accord with the proposed R-Residential Overlay District standards (CCPC# CU-03-19-15845, dated April 22, 2019). It is our understanding that conditional use approval for 56 townhouse units was granted on July 9, 2019, with 34 conditions of approval. We acknowledge the efforts of the applicant and Township in developing a design for townhouse development appropriate for this site. For instance, we acknowledge and endorse that the building layout has been revised to enlarge the central green space.

COUNTY POLICY:

LANDSCAPES:

3. The project site is located within the **Suburban Landscape** designation of *Landscapes3*, the 2018 County Comprehensive Plan, adjoining an **Urban Center Landscape** designation to the east. 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 types and affordability. Additionally, roads, sidewalks and paths with convenient access to parks and community facilities should be provided. The vision for the **Urban Center Landscape** is historic downtown and established neighborhoods serving as civic, economic, and population centers with a traditional town character, accommodating substantial future growth at a medium to high intensity. Transportation infrastructure improvements and amenities supporting a walkable community should be provided and integrated into the public transportation and roadway systems.

While townhouse development is an appropriate use in the **Suburban Landscape** and **Urban Center Landscape** designations, careful consideration of the proposed development activity is required due to the site's topography.

WATERSHEDS:

4. *Watersheds*, the water resources component of *Landscapes3*, indicates the proposed development is located within the Taylor Run subbasin of the Brandywine Creek watershed. *Watersheds'* highest priority land use objectives within this watershed are: reduce stormwater runoff, restore water quality of "impaired" streams, and protect vegetated riparian corridors. *Watersheds* can be accessed at [www.chesco.org/water](http://www.chesco.org/water).

PRIMARY ISSUES:

Access and Circulation:

5. We acknowledge, and endorse, that sidewalks and crosswalk areas shall be provided along the Bradford Avenue and Strasburg Road frontages, with pedestrian access provided to the adjoining ACE Hardware Store to the west along Strasburg Road. Sidewalks are an essential design element in the Suburban Landscape.

Condition #15 of the conditional use decision states that, subject to PennDOT approval and the consent of West Chester Borough, the applicant shall provide raised, or otherwise safe, crossings across Strasburg Road at the new entrance across from the shopping center driveway, and also at the intersection of Strasburg Road and Bradford Avenue, north to south and east to west across the north leg of Bradford Avenue. The details of these pedestrian crossings, which are not shown on the current preliminary plan submission, should be provided on the final plan.

6. The site plan depicts the location of an asphalt trail corridor along Bradford Avenue from the Road A entrance to an existing trail on the adjoining Bradford Square development to the south. We note that a standard trail detail is provided on Sheet 17, which indicates that the proposed trail will be five feet wide. We also note that the proposed trail will be located within a variable width trail access easement on the adjoining site to the south. We recommend that all trail corridor location details be incorporated into the final plan, and we also recommend that any trails be constructed prior to the Township issuing any building occupancy permits for this development.
7. The plan depicts an existing 50 foot wide right-of-way on Strasburg Road and Bradford Avenue. While the prior conditional use plan depicted an additional 15 feet of ultimate right-of-way on the south side of Strasburg Road, this ultimate right-of-way is not shown on the preliminary plan submission. This should be clarified by the applicant. We recommend that the Township, in consultation with PennDOT and West Chester Borough, determine the appropriate right-of-way width to be dedicated for both Strasburg Road (Route 162) and North Bradford Avenue to accommodate all transportation elements. In addition to the proposed pedestrian improvements, the Transportation Impact Study recommends that the existing two-way center-left turn lane on Strasburg Road be re-striped in order to provide a 75 foot west-bound left turn lane at the intersection of Strasburg Road and Bradford Plaza/proposed driveway. The County Planning Commission's Multi-Modal Circulation Handbook (2016 Update) classifies Route 162 as a major collector road. The Handbook (page 183) recommends an 80 foot-wide right-of-way for major collector roads to accommodate future road and infrastructure improvements. The Circulation Handbook is available online at:  
[www.chescoplanning.org/resources/PubsTransportation.cfm](http://www.chescoplanning.org/resources/PubsTransportation.cfm).
8. Condition #9 of the conditional use decision states that the plan shall depict, for the benefit of the ACE Hardware property owner, easements for sanitary sewer, public water and a motorized vehicle access connection large enough to accommodate deliveries. We acknowledge that a 40 foot wide access and utility easement to the adjoining ACE Hardware property to the west is provided. We suggest that, as part of the current plan submission, the Township engineer verify that adequate turning radii can be provided at this proposed location.
9. The plan indicates that the proposed driveway entrance on Strasburg Road will be aligned with the existing driveway entrance to the Bradford Plaza shopping center. As stated in our review of the conditional use application, consideration should be provided by the applicant and Township for the signalization of the proposed intersection, which should be developed and coordinated in timing for

traffic flow facilitation as part of a closed loop signal system with the existing traffic signals at the Bradford Avenue/Strasburg Road and Strasburg Road/Business Route 322 intersections. Signalization of this intersection should also be provided in order to ensure safe left-turn movements from the project site onto Strasburg Road.

10. The Township's emergency service providers should be requested to review the plan to ensure that they can safely navigate the proposed development when completed. We note that a Fire Truck Turning Plan is provided on Sheets 25 and 26.
11. General Note 29 on Sheet 4 states that Road A may be offered to the Township for dedication. This matter should be resolved prior to the Township granting final plan approval.

Design Issues:

12. The applicant and Township should consider providing dedicated bicycle parking. Bicycle racks should be located in visible areas near building entrances and/or areas of pedestrian activity such as bus shelters, and they should be located under a shelter or building overhang to provide shelter from the elements. Additional information on this topic is provided in the County Planning Commission's Multimodal Circulation Handbook (2016 Update), which is available online at: [www.chesco.org/documentcenter/view/27029](http://www.chesco.org/documentcenter/view/27029).
13. The site plan depicts the location of several retaining walls. The Township should verify 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.
14. The Township should verify that the design of the proposed outdoor lighting plan, as shown on Sheet 29, conforms to Township ordinance requirements. The illumination should be directed inward from the periphery of the site and be oriented to reduce glare and visual impact on the adjoining roadways and land uses.
15. While page 6 of the conditional use decision states that the common open space area in the central portion of the site will have amenities including a paver patio area, picnic tables, a fire pit and possibly an outdoor kitchen, the general location of these amenities is not shown on the preliminary plan. This should be clarified by the applicant.

Stormwater Management:

16. Land disturbance and land development activities that occur within Chester County must comply with the *County-wide Act 167 Stormwater Management Plan for Chester County, PA* (July 2013) and the associated Act 167 stormwater management ordinance standards adopted by each municipality. We acknowledge that the design of the stormwater facilities includes three underground basins, and we also acknowledge that condition #12 of the conditional use decision states that the design and construction of the subsurface facilities shall enable year-round use of the surface of the facility area for community space.
17. The applicant is requesting waivers from Section 94-306.K(3) and Section 94-311.A(3)(c) of the Township's Stormwater Management Ordinance (Chapter 94 of the Township Code), in order to allow the planned subsurface basins to be located closer than the minimum distances to right-of-ways, property boundaries, and structures. The Township should consider the following issues in its review of these waiver requests:

- A. The impact to roadways and structures adjacent to the planned basins by any post-construction settling that may occur around these basins.
  - B. The impact of stormwater infiltration from these systems on the stability of roadways and adjacent structures.
  - C. The locations of the planned stormwater basins will still allow for the entry of personnel and equipment to perform the required operation and maintenance while minimizing impacts to traffic flow and disturbance to residences.
18. The applicant is also requesting a waiver from Section 94-311.A(5)(m) of the Township's Stormwater Management Ordinance to allow roof gutters to be piped directly to SWM Basin 3. The Township should consider the following issues in its review of this waiver request:
  - A. Discharging roof drainage directly into the subsurface infiltration basin can result in the delivery of greater peak flow volumes to the stormwater system, which may result in the discharge of excess flow to the municipalities' existing storm sewer system.
  - B. Directing flow from roof gutters into lawn areas can increase infiltration and delay the delivery of stormwater to the planned subsurface basins, which will help to reduce the occurrences of overflow events to the municipal storm sewer system.
19. The project site is located in the Taylor Run subbasin of the Brandywine Creek watershed, which is listed by the Pennsylvania Department of Environmental Protection (PA DEP) as siltation-impaired. Additionally, East Bradford Township has a required annual sediment load reduction of 60.58% that is included in the Christina Basin Total Maximum Daily Loads (TMDL) sediment report. To help achieve this required sediment reduction and avoid increased pollutant loads, the applicant and Township should consider the following issues:
  - A. Inspect all erosion and sediment control measures after each precipitation event during construction to ensure that all measures are meeting their intended functions and appropriately capturing sediment prior to entering any stormwater infrastructure or discharging off-site.
  - B. The primary source of urban and suburban sediment pollutant loadings is widely considered to be stream channel erosion caused by excessive velocity and volume of stormwater runoff discharged into the stream. To contribute to achieving the Township's required TMDL sediment reduction and to avoid further increasing the sediment load, any additional measures that can be taken to reduce the total volume of runoff discharged from the site should be considered, such as reducing road surface area, increasing tree and vegetative cover, and limiting ground disturbance to the greatest extent practicable.
  - C. After completion of the project and site stabilization, continue to monitor the site for erosion caused by surface drainage as a component of the ongoing operation and maintenance activities. If any erosion is found, the eroded areas should be repaired as quickly as possible to avoid further expansion. This is especially important on freshly disturbed soils on steep slopes.
20. Given the high percentage of planned impervious coverage on this site, the applicant and Township should consider the following actions to reduce the volume of stormwater runoff generated:
  - A. Reduce surface compaction in any areas designated as community or open space to facilitate stormwater infiltration and promote the appropriate density and health of newly established vegetation. Particular care should be taken to avoid compaction on the planned lawn areas above the subsurface stormwater basins. The applicant should

- consider taking additional efforts to avoid compacting the top 12” of material when completing final surface grading efforts in these areas, such as limiting vehicular traffic, adding organic material, or aerating the site.
- B. Incorporate a native meadow mix in the planned lawn areas above Basins 1 and 2 and mowing these areas just twice annually to create a naturalized meadow area, which will promote increased stormwater infiltration.
  - C. Reduce the number of mature trees that will be removed from the site to the greatest extent possible. Mature trees reduce stormwater runoff by intercepting precipitation, increasing infiltration, and facilitating greater rates of evapotranspiration.
  - D. Place orange construction fencing at or beyond the drip line of all trees that are intended to remain on site to limit inadvertent impacts from construction equipment to root zones and long-term tree health, and to prevent unintended intrusion into woodland areas.
  - E. Incorporate permeable paving material, where suitable, into the planned sidewalks, trails, and driveways to reduce runoff from paved surfaces.
21. Given the development of new parking and sidewalk areas, the applicant should consider establishing a de-icing plan and material storage area for the sidewalks, roadways, and parking area that minimizes the volume of de-icing chemicals and pollutants that will directly infiltrate to groundwater or runoff to streams. Particular care should be taken to ensure de-icing materials kept in the planned winter maintenance areas do not runoff into the storm sewer system. Monitoring results throughout Chester County show rapid increases in baseline chloride concentrations, and pronounced spikes in chloride levels are often observed after winter precipitation events. Reducing chloride runoff from all pavement sources as well as roads is increasingly needed to minimize impacts to water resources.

#### ADMINISTRATIVE ISSUES:

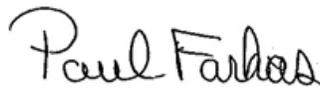
22. In addition to the requested waivers from the Township’s Stormwater Management Ordinance discussed in comments #17 and #18, the applicant is also requesting a waiver from the street grade standards in Section 95-21 of the Township Subdivision and Land Development Ordinance. Waiver requests should only be granted following the determination that the proposed project either meets the purpose of these requirements or does not create the impacts that these provisions are intended to manage.
23. Condition #24 of the conditional use decision states that the applicant shall depict on the plan locations for deposition of removed snow, ice and winter maintenance materials. While we acknowledge that the site plan depicts the location of three “winter maintenance areas,” the Township should verify that adequate areas have been set aside for snow storage.
24. The plan indicates that a Homeowners’ Association will be responsible for the proposed common facilities/areas. Ownership, maintenance, use provisions, restrictions, and liability responsibilities associated with any common held amenities should be written into the Homeowners' Association (HOA) document. The HOA document should include provisions which allow the Township to: intervene and maintain common owned facilities; determine the schedule for Association formation; timing for construction of common facilities; and determine the schedule for transfer of ownership from developer to the HOA of common facilities. The HOA document should be submitted as part of the application to the municipality to be reviewed by an attorney versed in homeowners' association documents to evaluate the document for its completeness and compliance.

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25. A Pennsylvania Department of Transportation (PennDOT) permit is required for new or revised access and should be identified on the final plan as required by Section 508(6) of the Municipalities Planning Code.
26. The applicant should contact the office of the Chester County Conservation District (CCCD) for information and clarification on erosion control measures. The provisions of the Commonwealth Erosion Control Regulations may apply to the project and may require an Earth Disturbance Permit or a National Pollutant Discharge Elimination System permit for discharge of stormwater from construction activities.
27. A minimum of four (4) copies of the plan should be presented at the Chester County Planning Commission for endorsement to permit recording of the final plan in accord with the procedures of Act 247, the Pennsylvania Municipalities Planning Code, and to meet the requirements of the Recorder of Deeds and the Assessment Office.

This report does not review the plan for compliance to all aspects of your ordinance, as this is more appropriately done by agents of East Bradford Township. However, we appreciate the opportunity to review and comment on this plan. The staff of the Chester County Planning Commission is available to you to discuss this and other matters in more detail.

Sincerely,



Paul Farkas  
Senior Review Planner

cc: Toll Mid-Atlantic LP Company, Inc.  
ESE Consultants, Inc.  
250 N. Bradford Avenue LLC  
Anthony Antonelli, District Permits Manager, PennDOT  
Francis J. Hanney, PennDOT  
Chester County Conservation District  
Kevin Gore, Director of Building, Housing & Codes Enforcement, West Chester Borough  
Chester County Water Resources Authority