



THE COUNTY OF CHESTER



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December 27, 2021

James Logan, City Manager
City of Coatesville
1 City Hall Place
Coatesville, Pa 19320

Re: Preliminary Land Development - Brandywine View Apartments
City of Coatesville - LD-12-21-17016

Dear Mr. Logan:

A preliminary land development plan entitled "Brandywine View Apartments", prepared by Pennoni Associates Inc. and dated October 13, 2021, was received by this office on December 2, 2021. 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 land development for your consideration.

PROJECT SUMMARY:

Location:	North side of Coates Street, east of North First Avenue (State Route 82)
Site Acreage:	7.8 acres
Units:	266 units
Proposed Land Use:	Apartment
New Parking Spaces:	312 spaces
Municipal Land Use Plan Designation:	"North Side" Potential Development Opportunity, and Transect-4 "Higher Intensity Neighborhoods" Zone (a small Transect-2 "Passive Areas" Zone is also to the south)
UPI#:	16-1-14

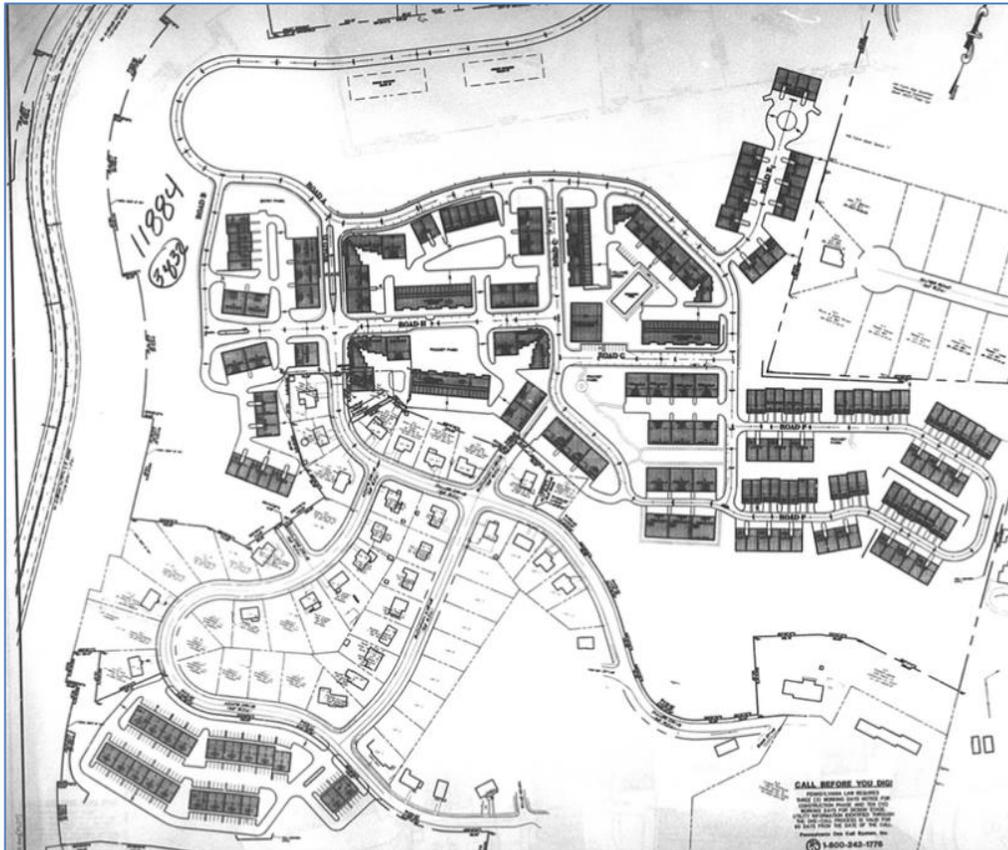
PROPOSAL:

The Act 247 referral form that was submitted with the applicant’s plan indicates that the applicant proposes the construction of 266 multi-family units and 312 parking spaces in four structures. The site, which will be served by public water and public sewer facilities, is located in the City of Coatesville RC/HND Residential Conservation/Hilltop Neighborhood Development Overlay zoning district. (The applicant’s October 10, 2021 “Brandywine View Apartment Complex Preliminary/Final Land Development Plan Coatesville City, Chester County, Pennsylvania” submission letter to the City states that the plan includes 240 units. That letter also states that “...the attached Environmental Impact Assessment Report was created for the overall approved development that includes the eighty (80) plus acres above Dulles Drive to the north.”).

RECOMMENDATION: The County Planning Commission recommends that the issues raised in this letter should be addressed and all City of Coatesville issues should be resolved before action is taken on this land development plan.

BACKGROUND:

On September 28, 2005, the Chester County Planning Commission reviewed a proposed land development for this site, which included 569 residential units on a 74.7-acre tract (refer to CCPC # 11884). A detail of that proposal, which includes the site of the applicant's current land development, is shown below:

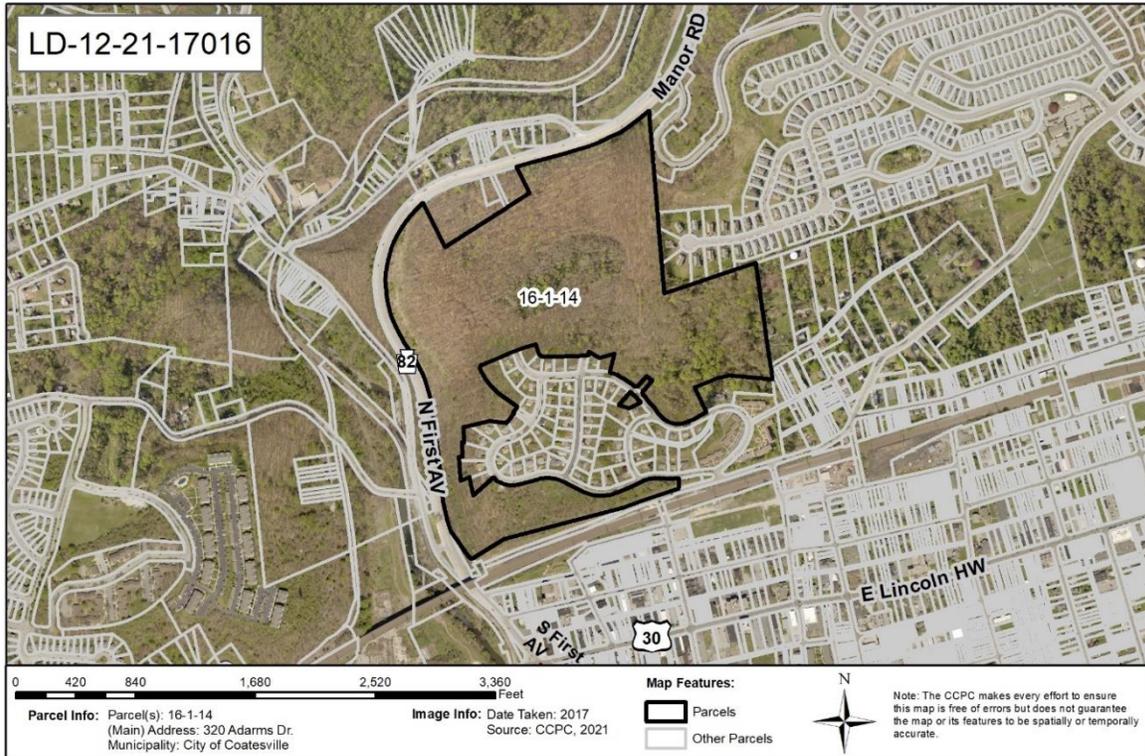


**Detail of "Brandywine View"
2005 Land Development Plan**

COUNTY POLICY:

LANDSCAPES:

1. The site is located within the **Urban Center Landscape** designation of [Landscapes3](#), the 2018 County Comprehensive Plan. 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. The proposed land development is consistent with the objectives of the **Urban Center Landscape**.



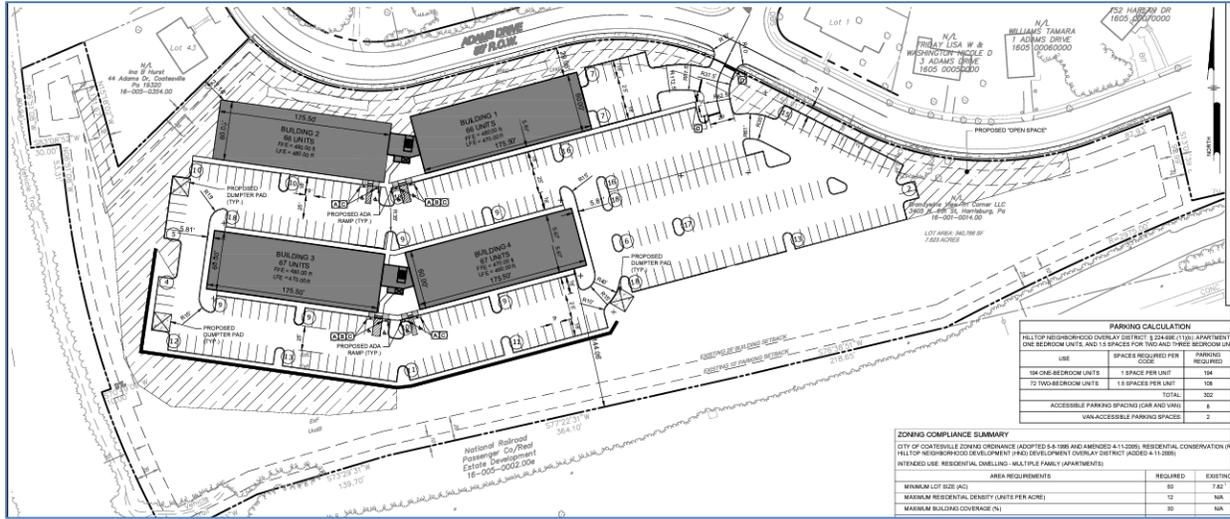
WATERSHEDS:

2. *Watersheds*, the water resources component of *Landscapes3*, indicates the proposed development is located within the West Branch 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.

3. 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.



Detail of the Current Brandywine View Apartments Preliminary Land Development Plan

PRIMARY ISSUES:

Ordinance Compliance:

- As noted above, the applicant’s October 10, 2021 submission letter to the City states that “...the attached Environmental Impact Assessment Report was created for the overall approved development that includes the eighty (80) plus acres above Dulles Drive to the north.” We recommend that the City verify how the 80-acre parcel relates to the current proposal, and whether it may have previously been considered as part of the open space for the existing development to the north.
- It is also unclear how the development meets the parcel size requirements for the HND Overlay District. The applicant is showing 7.82 acres for this development but the HND Overlay District appears to require a minimum of 50 acres. The City should clarify whether the applicant is basing the density calculations on 74.46 acres instead of 7.82 acres. The City should determine if a subdivision plan will be required.

We note that Section 244-99B.(2) of the HND Overlay District requires a minimum tract size of 50 acres.

Also< Section 244-99D.(1) of the HND Overlay district is as follows:

(1) Residential density: The maximum density of the residential component of an HND development shall not exceed 12 dwelling units per acre.

- The City should verify that the applicant is meeting the HND Overlay District’s open space and recreational area requirements. The proposed open space areas are peripherally-located and do not appear useable.

Section 244-99D.(7) of the HND Overlay district is as follows:

- (7) Minimum open space: Within the twenty-five-percent minimum green area, not less than one-half thereof (12 1/2% of the tract area, including the perimeter buffer area) shall be set aside for buffers and active and/or passive recreational areas (including "pocket parks" within the development area).
7. The applicant should indicate if this development is to be a phase of a larger HND plan. If this is a phased development, the applicant may need to follow specified design guidelines. Section 244-99F.(1)(i) of the HND Overlay district is as follows:
 - (i) Manual of design guidelines. At the time of land development plan submission for each phase or stage of development, a manual of design guidelines shall be submitted to illustrate the proposed design excellence, architectural excellence, and related construction excellence for the proposed architectural, streetscape, and landscape features. (Applicants are encouraged to submit components of the design guidelines as interim work products and sketches prior to formal submission.) Said manual shall be consistent with the applicable General Design Principles set forth in Exhibit B of Article XVIII *Editor's Note: Exhibit B is included at the end of this chapter.* and shall be submitted for approval by City Council, which approval shall not be unreasonably denied provided it complies with the applicable aforementioned general design principles.

Section 244-99G. of the HND Overlay district is as follows is as follows:

- G. The following provisions shall apply in the case of a development pursuant to this article which is proposed to be constructed over a period of years, in order to encourage the flexibility of housing density, intensity and type of nonresidential uses, as intended by this article:
 - (1) Pursuant to the staging/phasing plan, each phase or section may vary from the density, intensity of use, and/or permitted uses established for the entire HND development.
 - (2) A greater concentration of density or intensity of land use is permitted within separate phases or sections, irrespective of whether such phases are earlier or later in the development than others.
 - (3) The developer, with approval of City Council, shall also have the right to revise the location of open spaces so that flexibility of development, which is a prime objective of this article, can be maintained.
8. The City 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. Areas of steep and moderate slopes should be protected from disturbance that may cause erosion and flooding, as well as negatively impact water quality, wildlife habitat, slope stability, and scenic views.
 9. The plan and 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 buildings 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. Orange construction fencing should be placed at the "limit

of disturbance” to prevent unintended intrusion into woodland areas by construction equipment. This fencing should be placed at the drip line of any trees that are intended to remain to limit inadvertent impacts from construction equipment to root zones and long-term tree health. Additional native trees and shrubs should be incorporated into the landscaping plans to replace and mitigate the loss of removed trees.

Design Comments:

10. The area to the north consists of much lower-density residential developments, including single-family dwellings. We suggest that the applicant conduct a shadow analysis to predict how the proposed multi-story buildings will affect the neighborhood to the north.
11. The parking at the eastern section of the site is somewhat remote from the buildings. We suggest that the applicant consider reorienting the buildings to create more convenient pedestrian access from the parking areas.
12. We suggest the applicant consider eliminating at least one of the proposed buildings or reconfigure the buildings to limit environmental impacts and provide more usable and centralized open space and recreational areas. Reconfiguring the buildings to allow parking underneath would decrease the footprint for the required parking, provide room for usable open space, and limit the environmental effects on the site, such as on the steep slopes and woodlands.

For example, the applicant could place the buildings in terraces and locate parking under the structures. Also, the applicant should consider the potential to break up the four large structures into more smaller structures that would create less site disturbance and visual effects on the areas to the north. Orienting the buildings in a north-south configuration could also reduce site disturbance and visual effects.

13. The applicant has requested a waiver from landscaping requirements at some parking areas. We suggest that the City carefully evaluate these waiver requests.

Stormwater Management:

14. The Post Construction Stormwater Management Plans indicate that subsurface infiltration practices will be utilized to manage a portion of the site’s stormwater runoff. The applicant should submit the Operations and Management Plan for the stormwater facilities to the City, which should be reviewed by the municipal engineer. To ensure this system continues to function as designed, the applicant and/or those responsible for future maintenance should strictly adhere to the inspection schedule included in the Operation and Maintenance Plan. Appropriate pre-treatment Best Management Practices (BMPs) should be installed to remove sediment and other debris from runoff before it discharges to the planned subsurface infiltration system. Sediment, oil, grease, or other debris should be regularly removed from these pretreatment BMPs.

Subsurface infiltration stormwater management practices are not appropriate for areas that will receive runoff with high sediment loads. Particular care should be taken during construction to prevent compaction of the soil below the system and to minimize the delivery of sediment to this system from construction runoff. The applicant should ensure that sufficient observation wells and access points are incorporated into the design and are located in areas that will remain easily accessible. These access points should be designed to allow for the occasional removal of accumulated sediment.

Access and Circulation:

15. The primary objective of the County Planning Commission's Chester County Public Transportation Plan (2014) is to provide an affordable, reliable, and accessible public transportation network to offer mobility, encourage favorable land use patterns, sustain the environment, and alleviate congestion within designated growth areas. Therefore, the applicant and the City should consider providing a location for future public transit stop on this site. The Plan is available online at: <http://www.chescoplanning.org/Transportation/PTP.cfm>.
16. "Connect" Objective C of *Landscapes3*, the 2018 County Comprehensive Plan, is to provide universally accessible sidewalks, trails, and public transit connections to create a continuous active transportation network within designated growth areas. Therefore, we recommend that direct pedestrian access, including crosswalk areas, be provided from the buildings to the adjacent roads. Pedestrian connectivity between sidewalks and buildings is an important component of a complete sidewalk system in the **Urban Center Landscape**.
17. PennDOT's Design Manual 2 - Chapter 6: Pedestrian Facilities and the Americans with Disabilities Act (ADA) recommend that sidewalks be a minimum of 5 feet in width. Additional information on this topic is provided in the Pedestrian Facilities Design Element of the County Planning Commission's Multimodal Circulation Handbook (2016 Update), which is available online at: www.chescoplanning.org/MuniCorner/MultiModal/02-PedFacs.cfm.
18. We suggest that the City's review of this plan submission would benefit from the preparation of a traffic impact study and a review of the potential impacts posed by this project. We also recommend that the applicant work with the City and SEPTA to determine how pedestrians may travel to the proposed relocated Coatesville Train Station, including the use of bicycles. 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/27031

Additional information on bus stops and public transit is provided in the County Planning Commission's Multimodal Circulation Handbook (2016 Update), which is available online at: www.chesco.org/documentcenter/view/27031. Therefore, the applicant should consider providing dedicated bicycle parking at the site. 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.

The City and the applicant should contact SEPTA and AMTRAK regarding potential access to the train station.

Other Comments:

19. We suggest that the applicant and City consider providing a percentage of affordably-priced housing units within the proposed apartment building. "Live" Objective B of *Landscapes3* is to accommodate housing at costs accessible to all residents. Additionally, the County has established the A+ Homes initiative, which focuses on creating homes that are attractive, affordably-priced, adaptable, aging-friendly, and accessible. Additional information on the A+ Homes initiative is available online at: <https://www.chescoplanning.org/Housing/aPlusHomes.cfm>.

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Additional information on housing affordability is available online at this Chester County Planning Commission's eTool:

<https://www.chescoplanning.org/MuniCorner/eTools/34-AffordableHomes.cfm>

20. The City Fire Marshal should verify the design and location of all proposed fire-protection facilities.

ADMINISTRATIVE ISSUES:

21. A minimum of four 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.
22. The applicant should contact the office of the Chester County Conservation District (telephone #610-455-1360) 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. Additional information on this topic is provided online at: <https://www.chesco.org/284/ErosionStormwater>.

This report does not review the plan for compliance to all aspects of your ordinance, as this is more appropriately done by agents of the City of Coatesville. 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,



Wes Bruckno, AICP
Senior Review Planner

cc: Pennoni Associates Inc.
Brandywine View Tri Corner LLC
Mark E. Cassel, AICP, Director of Service Planning, SEPTA
Chester County Conservation District