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**MONTGOMERY COUNTY
PLANNING COMMISSION**

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JODY L. HOLTON, AICP

EXECUTIVE DIRECTOR

April 8, 2015

Mr. Jason Bobst, Manager
West Norriton Township
1630 West Marshall Street
Jeffersonville, Pennsylvania 19403-3236

Re: MCPC #12-0031-003
Plan Name: Westover Recreational Use Development
(1 lot, 40,000 square feet on 90.08 acres)
Situat: Port Indian Road (E) @ Hemlock Road
West Norriton Township

Applicant's Name and Address

VRJ Associates, L.P.
c/o Buckley, Brion, McGuire & Morris, LLP
118 West Market Street – Suite 300
West Chester, PA 19382

Contact: Michael S. Gill, Esq.
Phone: 484-887-7534

Dear Mr. Bobst:

We have reviewed the above-referenced land development plan in accordance with Section 502 of Act 247, "The Pennsylvania Municipalities Planning Code," as requested on March 11, 2015. This letter is submitted as a report of our review and recommendations.

Background

The applicant is proposing a multi-sport athletic complex, consisting of a golf course, four soccer fields, one "U10" soccer field, 10 tennis courts, five baseball fields, five basketball courts, two swimming pools, a football field with a track, three tot lots, two picnic pavilions, and a skate park. The applicant is also proposing a 40,000 square foot banquet facility. The tract in question, which is located in the RE Recreation District, is currently utilized as a public golf course.

Review Comments

1. Compatibility with Adjacent Uses – We noted in our previous letter, dated May 4, 2012 that the use may not be compatible with adjacent residential uses due to its size and intensity. We noted that the area is zoned RE Recreation, but that this "recreational" use appears to be more commercial in character. Due to the significant traffic and noise that this use will generate we feel that it would be more appropriate in a commercial or industrial district.

2. Township Planning Documents – Also, noted in our letter dated May 4, 2012, it does not appear that this plan conforms to the goals of the West Norriton Township Comprehensive Plan. Specifically, there is an objective to “preserve all or portions” of the Westover Golf Club. It should also be noted that we previously pointed out that the West Norriton Open Space Preservation Plan shows the tract in question as permanently preserved.
3. Traffic Impact Study (TIS) – The TIS shows improved Level of Service (LOS) conditions between the 2012 existing and the 2012 future conditions without development at Schuylkill Avenue and Main Street. Conditions for northbound Schuylkill are LOS D for both peaks in the existing 2012 conditions, but improve to LOS C for the Saturday Midday Peak in the future. This improvement should be explained or revised, as necessary. Future conditions with redevelopment should be revised accordingly.

It should also be noted that the proposed recreation complex appears to be considerably more intense with large parking facilities, more individual uses and indoor facilities than the comparable sports complexes from the aerials provided in the TIS.

4. Stormwater Management – Our previous review of this proposal suggested that porous pavement may be a good option for this facility. We note that the applicant has included porous pavement for several of the parking areas in this version of the proposal. We commend the applicant for this addition.
5. Buffers – A buffer has been added to the perimeter of the property. We commend the applicant for this addition, but we are still concerned about the effects that such an intense use will have on surrounding residential properties. Moving more of the parking to the perimeter of the property and having the playing fields closer to the center may help mitigate these effects.
6. Sidewalks – In our previous letter we noted that proposed sidewalks throughout the site are shown without any planting strip between the sidewalk and the roadway. We feel that a planting strip with street trees would provide a safe and attractive buffer between pedestrians and automobile traffic.
7. Parking – Previous plans showed 1,801 parking spaces. The most recent version of the proposal now shows 1,760 parking spaces. As we have noted in our previous review, it is unclear how the parking needs listed on the plan were arrived at. The West Norriton Township Code provides no guidance for parking needs for facilities such as soccer fields and tennis courts.
8. Previous Letter – Since our previous letter, dated May 4, 2012, has been referenced multiple times and many of the issues raised in that letter are still pertinent, we have attached a copy that letter to this report.

Recommendation

We recommend that the issues mentioned above, and all issues mentioned in our letter dated May 4, 2012, be resolved to the Township's satisfaction before granting approval. Please note that the review comments and recommendations contained in this report are advisory to the municipality and final disposition for the approval of any proposal will be made by the municipality.

Should the governing body approve a final plat of this proposal, the applicant must present the plan to our office for seal and signature prior to recording with the Recorder of Deeds office. A paper copy bearing the municipal seal and signature of approval must be supplied for our files.

Sincerely,



Brandon Rudd, Senior Planner
610-278-3748
brudd@montcopa.org

- c: VRJ Associates, LP, Applicant
- Edward B. Walsh & Associates, Inc., Applicant's Engineer
- Bruce Shoupe, Chrm., Township Planning Commission
- Christen Pionzio, Esq., Township Solicitor
- Joseph Estock, Township Engineer
- Michael Valyo, Township Director of Public Works & Planning
- E. Van Rieker, Planning Consultant

Attachment: MCPC Review Letter of May 4, 2012

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STEVEN L. NELSON, AICP
ACTING DIRECTOR

4 May 2012

Mr. Michael J. Valyo, Code Enforcement Officer
West Norriton Township
1630 West Marshall Street
Jeffersonville, Pennsylvania 19403

Re: MCPC # 12-0031-002

Submission Data

Plan Title: "**Westover Sporting Complex**"

[1 lot, 50,000 square feet on 95.00 acres]

Type of Review: Land Development Plan (Preliminary)

Situate: South Schuylkill Avenue (west)

Brandon Road (south)

West Norriton Township

Applicant Information

VRJ Associates, L.P.

401 South Schuylkill Avenue

Norristown, Pennsylvania 19403

Contact: Adam Brower, P.E.

Telephone: 610.903.0031

Dear Mr. Valyo,

We have reviewed the above-referenced land development plan in accordance with Section 502 of Act 247, "The Pennsylvania Municipalities Planning Code", as requested on April 5, 2012. This letter is submitted as a report of our review and recommendations.

Application Overview

VRJ Associates, L.P., the applicant, seeks permission to construct a multi-sport athletic complex, consisting of a golf course, 5 soccer fields, 10 tennis courts, 4 baseball fields, 5 basketball courts, 2 swimming pools, a football field/track, 3 tot lots, 2 picnic pavilions and a skate park. It shall be built on a 95.00-acre, RE Recreation Districts property (County Parcel ID 63 00 0007745 004, 63 00 07744 00 5), which, at present, functions as a public golf club with meeting and banquet facilities. The preliminary plan submission also depicts a planned one-story, 50,000 square foot building to be utilized as a clubhouse. Off-street parking on the subject site will be reconfigured and expanded to accommodate a total of 1,801 vehicles. We report that the project will be served by public water and public sewer facilities.

Comments

The MCPC has the following remarks. These issues, we suggest, should be addressed by the applicant prior to final plan approval.

Conformance with County Planning Objectives

- General Comment – The Montgomery County Planning Commission believes that the use of the Westover Country Club as an active recreation, multi-sport athletic complex does not appear to be congruous with neighboring residential uses in the municipality. According to

plans advanced by the applicant, ball fields, tennis/basketball courts, a skate park, as well as bleachers for spectators, are to be sited or placed adjacent to existing housing. While the applicant's lands are zoned RE Recreation, per the Official Zoning Map, this proposal- with the number and intensity of uses along with its parking needs- seems to be more commercial in character. It could, potentially, generate considerable traffic and noise, and, we believe, may be more appropriate in an area zoned for commercial or industrial uses.

Conformance with Township Planning Objectives

- Consistency With Township Comprehensive Plan Update – It appears to be unclear as to how the plan, as proposed, conforms to policies articulated in the West Norriton Township Comprehensive Plan Update 2010. We cite a statement, appearing in the Vision Plan component of this document, which says that (the Township shall) “look for techniques to preserve all or portions of Markley Farm and Westover Golf Club”. Municipal officials should consider how the applicant's proposal to develop portions of the Westover Country Club site will change or alter this objective.
- Consistency With Township Open Space Objectives – As written in our April 5, 2012 letter to the municipality regarding this submission, the plan does not conform to goals and recommendations included in the West Norriton Open Space Preservation Plan 2006 Update. It is stated that a goal of the plan is to *maintain a low to medium density suburban character within the Township*. Moreover, the West Norriton Township Protected Land Map- a part of Open Space Plan 2006 Update- delineates the applicant's parcel as *permanently protected lands*. This report also mentions that *this property is permanently preserved open space pursuant to a deed restriction filed in favor of the Township which permits the proposed adult/retirement community approved for this site to occupy a portion of the existing golf course*.

Municipal Code Compliance

Subdivision and Land Development Ordinance (Chapter 22)

- Design Requirements/Requirements. (§501) – The MCPC mentions that the Subdivision and Land Development Ordinance features general design standards that according to this section *shall be observed by the applicant in all instances*. Among these standards, is a requirement, which states *whenever possible, applicants shall preserve trees, groves . . . scenic points and other community assets and landmarks*. Furthermore, it is stipulated that *proposed . . . land development shall be coordinated with the existing nearby neighborhood so that the community as a whole may develop harmoniously*. We recommend that the applicant, or its representatives, elucidate how the plan, as proposed, will comply with these requirements.
- Lot Requirements; Grading; Planting. (§507.3.C) – It is specified in the SALDO that *all trees six inches or more in caliper at breast height should not be removed unless within the proposed right-of way line of a street or impracticable for development*. And, *relocation of noteworthy plant material should be encouraged where retention is impracticable*. We observe that according to the submitted Landscape Plan, it appears that trees identified on the Existing Features Plan as “to be removed” shall be felled and not transplanted in another area of the site. Although we recognize and are aware that the Township has no regulations that would require tree replacement, it is nevertheless suggested that any significant mature trees or noteworthy plant material, if feasible, should be transplanted to other locations on the subject tract.

- Preliminary Plans/Existing Features (§601) – Per West Norriton plan submission requirements, the submitted plan(s) shall show or depict *existing features within 400 feet of any part of the land being subdivided or developed*. The drawings, as submitted, do not seem to meet this standard. Thus, the plans should be amended accordingly; otherwise, a waiver should be sought.
- Traffic Impact Fees/Special Traffic Studies (§1008.1) – Appearing in the Township's SALDO are regulations pertaining to traffic impact fees. It is written in this section that, *said impact fee shall apply to all new developments or subdivisions within the transportation service area identified herein and shall be a condition precedent to final approval of a development . . . or issuance of a building permit*. Accordingly, the Subdivision and Land Development Ordinance mandates that *the Township may require the preparation of special transportation studies to determine the traffic generation or circulation patterns in new nonresidential developments only*.

Zoning Ordinance (Chapter 27)

- RE Recreation Districts/Use Regulations/Intent of District (§1201) – It is the opinion of the Montgomery County Planning Commission that the intent of the ordinance which created the RE District was to grant flexibility in allowing future improvements to the country club facility by permitting certain, defined *ancillary or complimentary* uses, such as tennis courts or swimming pools. The plan proposed by the applicant seeks to introduce several new active recreational uses (i.e. soccer fields, baseball fields, football field, track, spectator bleachers) that may not be in keeping with the present character of the development and its environs. We defer to the Township Solicitor to determine whether the redevelopment of the property as a multi-sport athletic complex is consistent with the use regulations as outlined in this section of the Zoning Ordinance.
- RE Recreation Districts/On-site parking. (§1202) – A provision appears in this section of the Zoning Ordinance that reads *adequate on-site parking shall be provided for the accommodation of all persons customarily using the recreational facilities afforded*. Although the applicant's engineer has stated on the plan that this proposal is in compliance with this regulation, the County Planning Commission is unable to determine the source of the parking standards for specified uses as indicated on the plan. Justification for the number of spaces proposed, we recommend, should be provided to Township officials.

Also, as mentioned in our review of the applicant's sketch plan drawing, the plan does not appear to indicate the number of existing parking spaces on the development parcel, so we are unable to determine the degree to which off-street parking facilities shall be expanded. Further clarification may be needed.

- General Regulations/Required Off-Street Parking and Loading. (§1410) – Featured in this section of the West Norriton Zoning Ordinance are parking standards and criteria for various uses including an "indoor athletic facility" and "conference facility". We caution that there appears to be no Township requirements for several of the recreational uses planned for the subject tract including "soccer field", "tennis court", as well as "clubhouse". As a consequence, we cannot confirm that the plan, as proposed, satisfies municipal parking requirements. Again, the applicant's engineer should explain how parking standards for the planned project have been formulated.
- Parking Regulations. (§1410.J.(4)) – We cite this portion of the Zoning Ordinance, which reads, *lighting facilities shall be so arranged that they neither unreasonably nor*

unnecessarily disturb occupants of adjacent residential properties . . . by either location or glare. Our cursory review of the submitted Lighting Plan reveals that proposed lighting facilities to be installed on the subject tract may cause light trespass and/or spill light on the abutting residential properties situated on Brandon Road. This issue, the MCPC suggests, should be addressed by the applicant.

- Required Off-Street Loading and Unloading Facilities. (§1410.L) – West Norriton zoning regulations stipulate that *an off-street loading and unloading space, with proper access from a street or alley, shall be provided on any lot on which a building for trade or business shall be hereafter erected or substantially altered.* It appears that no such loading area has been identified on the plan for the proposed 50,000 square foot clubhouse facility. The plan, we suggest, should be amended or revised accordingly.

Environmental Issues

- Stormwater Management – With respect to stormwater management, the plans appear adequate. Notwithstanding, it is recommended that the Township Engineer be consulted to determine what, if any, additional best management practices could be employed to further increase on-site infiltration and reduce impervious coverage in order to minimize any potential threat of downstream flooding. We make mention of the fact that recreational facilities, building rooftops, as well as internal access roads can all contribute to increased surface drainage and runoff. Various strategies, if desired, can be utilized to address this issue. As an example, we note that proposed basketball courts could be constructed with a porous paving material.

Transportation Issues

- Traffic Impact Study – The main access to the subject tract is via Schuylkill Avenue, a residential road. As previously discussed, the applicant, at a minimum, should commission the preparation of a traffic impact study in order to inform the Township how the surrounding street network will be affected.
- Additional Road Improvements – It is noticed that the plans put forth for review depict road improvements to access points on South Schuylkill Avenue and Port Indian Road. While sufficient, we warn municipal officials that due to the potential of increased traffic generated by this development, further road improvements to the intersection of Schuylkill Avenue and West Main Street as well as the intersection of Egypt Road and Port Indian Road may be necessary. This matter should be addressed.

Design Issues

- Landscape/Buffering – We observe that other than the screening of parking lots, no additional buffering will be provided around the periphery of the applicant's property. It is suggested that additional buffering be provided in order to screen recreational facilities from existing residential development adjacent to the subject tract.
- Site Lighting – As stated earlier in our report, we are concerned as to how the lighting of athletic facilities will impact neighboring residential properties. It is recommended that the applicant review with the Township what shall be done to limit light trespass from the site.
- Pedestrian Facilities and Accessibility – The County Planning Commission advocates the concept of "community connectivity"- that is, a comprehensive, connected pedestrian

network should be a major feature of any development proposal. Accordingly, it is suggested that the plan should take into account these concerns.

Internal pedestrian connections. It is our belief that the Westover Sporting Complex should be thought of as a *single, unified development*. Pedestrian connections between each building/use within the development should be provided.

External pedestrian connections. The internal sidewalk network furnished on the site should be extended to link this planned project with existing development on adjoining parcels. In accordance with Township regulations, the plan shows proposed sidewalks along the South Schuylkill Avenue and Port Indian Road frontages of the site. It is recommended that the internal walkpath system be connected to sidewalk to be placed along each road.

Walkway Considerations. In order to facilitate the safe movement of pedestrians, proposed sidewalks should be physically separated from vehicular use areas. We notice that according to the plan, sidewalks directly abut internal access roads and parking areas. In order to minimize any possible conflicts with passing motor vehicles, sidewalks should be separated from the road with a planting strip or some other type of setback.

Traffic calming. Traffic calming measures should be incorporated where appropriate to discourage speeding along internal access roads. Such measures may include additional crosswalks, textured paving, signage, and speed tables.

- Access for the Physically Disabled – The submitted plan indicates that designated parking stalls for handicapped persons shall be provided on-site; however, it is unclear to us as to how persons will gain access from parking areas to existing/planned buildings or recreational facilities, for no curb ramps appear to be delineated on the drawings.
- Parking Capacity – Per data shown on the plan, 1,801 parking spaces are proposed for this development project. In order to limit land development impacts from excess parking and impervious coverage, the MCPC supports the notion of site parking capacity to *meet, but not exceed minimum requirements*. We recommend that the applicant provide justification for its intended parking needs. Changes or modifications to the plan, we believe, could be warranted.
- Proposed Bleachers/Height – We notice that no information appears on the plan indicating the height of proposed bleachers adjacent to residential lots on the northern part of the project site. Even though we recognize that RE District regulations in the Zoning Ordinance govern the height of buildings only, the applicant, or its representative, should nonetheless elucidate how tall this structure shall be in order to properly evaluate its impacts on the neighboring properties.
- Bus/Large Vehicle Parking – We notice that there appears to be no planned parking on-site reserved for buses and large vans- a feature typically associated with this type of facility. It is suggested that this matter should be addressed.
- Trash and Refuse Areas – According to information presented on the submitted drawings, no area reserved for refuse on the site seems to be identified or delineated. The applicant's engineer should clarify where trash shall be stored for the proposed clubhouse facility and how on-site removal will be handled.
- Bicycle Accessibility/Storage – As discussed in our prior review letter, the County's *Bicycling Road Map- A Bike Mobility Plan for Montgomery County, Pennsylvania* designates

South Schuylkill Avenue as a *secondary bicycle route*. Moreover, our adopted Comprehensive Plan encourages bike travel, with safe and direct access to residences, retail shopping destinations, recreation areas, and places of employment. We suggest that thought be given to how the submitted plan can be modified- if possible- to accomplish these objectives. The plan should provide for safe bicycle movement within the site. Bicycle connections between abutting properties should be coordinated with vehicular routes to encourage bike usage. Parking (short term) for bicycles should also be provided.

Assignment of County Plan Review Number

Each time a municipality forwards a plan to us for review, a member of our staff is required to assign a unique, nine-digit identifier to the submittal. This identifier is commonly referred to as a *MCPC number*. We inform you that "12-0031-001" has been set aside for this application.

It is requested that it be conveyed to the applicant's engineer that in the future, if subsequent drawings are prepared, the MCPC number should appear on the plan in the box reserved for the seal of our agency.

Recommendation

The use of the site as a multi-sport recreation complex we feel is not compatible with the surrounding residential land uses. Though the site is zoned for recreation uses, the plan, as submitted, depicts an intensely designed facility designed for a variety of team sport use and training. These types of active recreation centers typically possess characteristics more similar to commercial uses- heavy traffic generation, noise, lighting intensity, and large parking areas- making them more appropriate on commercially or industrial zoned lands.

Please note that the review comments and recommendations contained in this report are advisory and *final disposition for the approval of any proposal will be made by the municipality*.

Should the governing body approve a final plat of this proposal, the applicant must present the plan to our office for seal and signature prior to recording with the Recorder of Deeds office. A paper copy bearing the municipal seal and signature of approval must be supplied for our official files.

Best regards,



Kevin Chavous
Design Planner

610.278.3731 e mail kchavous@montcopa.org

- c: Bruce Shoupe, Chairman, Township Planning Commission
Joseph M. Estock, P.E., Joseph M. Estock Consulting, Township Engineer
E. Van Rieker, AICP, Township Planner
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Adam Brower, P.E., Edward B. Walsh & Associates, Inc., Applicant's Engineer