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SCOTT FRANCE, AICP
EXECUTIVE DIRECTOR

June 20, 2024

Mr. Edward C. Wagner, Manager
Lower Pottsgrove Township
2199 Buchert Road
Pottstown, PA 19464

Re: MCPC #22-0239-003
Plan Name: Sanatoga Land Holdings, LP
(200 dwelling units, a 7,881 square foot clubhouse, and 119,018 square feet of nonresidential development on 3 lots comprising 20.46 acres) Density: 9.8 dwelling units per acre (based on total mixed-use tract area)
Situate: Evergreen Road & Castle Road
Cross Street: Lightcap Road
Lower Pottsgrove Township

Dear Mr. Wagner:

We have reviewed the above-referenced subdivision and land development in accordance with Section 502 of Act 247, "The Pennsylvania Municipalities Planning Code," as you requested on May 8, 2024. We forward this letter as a report of our review.

BACKGROUND

Montgomery DelVal Association, LP/Sanatoga Land Holdings, LP, the applicant, has submitted a subdivision and land development plan. The plan would consolidate three lots into one. The site is the location of three basins, including two erosion and sedimentation basins proposed to be removed. It is also the site of a barn, garage, shed, and a portion of a mobile home. In addition to this subdivision and land development proposal, the site is the location of ongoing construction for a Wawa convenience store with gas, the subject of an approved plan. A conditional use is required for buildings other than hotel/motels. The applicant is seeking conditional use approval to permit disturbance of man-made and natural steep slopes greater than 25% for residential uses and greater than 15% for nonresidential uses.

The applicant would construct 119,018 square feet of nonresidential development, including a five-story, 125-room hotel and two fast food restaurants (2,549 and 2,449 square feet). The plan also proposes development of 200 multifamily residential units in four buildings (one would be three stories in height; the others would be four stories), a freestanding accessory club house 7,881 square feet in size, and 2.61 acres allocated to open space. The open space would include a playground and a 1,000 square foot nonresidential recreation area. The proposal includes seven stormwater basins: four above ground (three of which would be designed for managed release and one of which would be designed for infiltration) and three below (two designed for managed release and one designed for detention). The tract is located in the G-MU Gateway--Mixed Use zoning district. The site is served by public water and sewer. The plans are dated April 12, 2024.

COMPREHENSIVE PLAN COMPLIANCE

The proposed improvements are generally consistent with *MONTCO 2040: A Shared Vision, The Montgomery County Comprehensive Plan*. The comprehensive plan shows that the project is located in the "Community Mixed Use" future land use area. This future land use category consists of local community focal points that typically have a significant retail or institutional element with surrounding residential uses. They are located on major roads within the community and usually have a suburban character. Developments should be designed for walking, be compatible with residential areas, and have extensive buffering and residentially-scaled buildings next to residential areas.

The Pottstown Metropolitan Regional Planning Committee (PMRPC) found the proposed development to be generally consistent with the Pottstown Metropolitan Regional Comprehensive Plan, which places the location in the "Primary Growth Area." These areas are where new growth, particularly nonresidential and high-density residential growth, should be focused. However, the PMRPC did express concern about the potential cumulative impacts of the inevitable increase in vehicular traffic in this area of the Region and whether these potential impacts are being jointly studied and addressed by Lower Pottsgrove Township and Limerick Township. The Committee recommended that the township and applicant work with PennDOT and Limerick Township to develop and implement improvements to the road network that will promote efficiency and safety along the Evergreen Road corridor.

RECOMMENDATION

The Montgomery County Planning Commission (MCPC) generally supports the applicant's proposal, however, in the course of our review we have identified the following issue(s) that the applicant and township may wish to consider prior to final plan approval. Our comments are as follows:

RECOMMENDATION

CONDITIONAL USE

A. General Standards. The Board of Commissioners may require alternative site layouts in order to limit the adverse impact of a proposed conditional use. To better evaluate the impacts of the proposed buildings D and E on adjacent residential uses, the Board of Commissioners might require a shadow analysis of the proposed buildings. This can be done relatively easily on apps, and can determine whether shadows will fall on adjacent homes at different times of day, based on the time of year [§250-158.7].

DIMENSIONAL REQUIREMENTS

A. Maximum Height [§250-158.2].

1. The proposed building heights should be listed in the dimensional table. The zoning district requirements table lists "Max. Permitted Height" as "50.0'." The table does should note that the maximum height is actually 50 feet or four stories, whichever is less, for buildings other than hotels, and that the maximum height for hotels is 65 or five stories, whichever is less (the maximum height by land use should be provided).

2. Minimum side and rear building setbacks shall be increased two feet for each foot of building exceeding 50 feet.

3. Buildings over 50 feet shall be subject to an additional 20 feet of front yard setback for the portion of the building over 45 feet high.

B. Yards. The yard abutting Evergreen Road (a public road) and yard abutting the three private roads along the reserve parking area are labeled "front," but the yard abutting Castle Road (private road) is labeled "side." The definition of "Lot: Front of Lot" states that, "In the case of a corner lot, the front may be designated by the proper authority or by election of the owner" [§250-8].

C. Maximum Building Area. Maximum building areas apply to retail and hotel development [Table 158.6-01].

ARCHITECTURE

Prior to preliminary plan approval, the applicant is required to comply with the architectural design guidelines and submit examples of the proposed architecture using drawings, photographs, and samples of materials [§250-118.18]. Photo examples of residential development are included in the submission but examples or renderings related to the other proposed land uses (hotel and fast-food restaurants) were not provided.

TRANSPORTATION

A. Airport Hazard Area. The township and applicant should ensure that the proposed development complies with the township's Airport Overlay Zoning District [Article XXV]. The development site lies approximately 4,100 feet from the end of the Pottstown-Limerick Airport runway.

B. Parking.

1. If the number of required spaces is substantially larger than the number anticipated by the applicant, the reserve parking option may be utilized to avoid unnecessary paving, in accordance with criteria specified in [§250-204. Parking Reserve Areas]. The Institute of Transportation Engineers (ITE) Parking Generation Handbook (2019) shows that fast food restaurants with drive-through windows in general urban/suburban settings generated demand for an average of 15 parking spaces per 1,000 square feet of gross floor area and 0.6 parking spaces per seat. Given the extensive allocation of the fast food restaurant portion of the development site to proposed parking, there is little room for pedestrian accommodations and green space. Allowing the applicant to put parking in reserve would provide greater flexibility for site design and accommodation of pedestrians.



Structure shown by aerial imagery (Nearmap, March 11, 2024)

2. Groupings of parking spaces shall not exceed 10 spaces in a row [§250-158.2.B].

C. Wayfinding Signage. We recommend that a robust wayfinding signage system (designed both for motorists and pedestrians) be used to help motorists and pedestrians find their destination, due to the site's large area, the distance of many of the buildings from Evergreen Road, and curving driveways. Details can be included in the plans [§250-158.17].

D. Detours. We recommend the applicant and township consider how construction on the project would affect traffic traveling to and from the nearby Limerick Generating Station, and plan for appropriate detours.

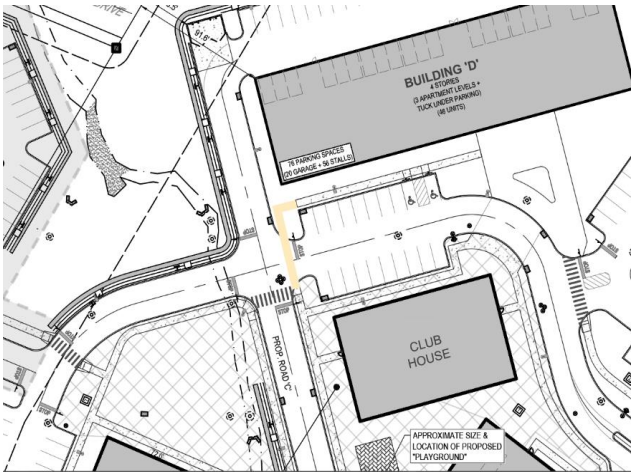
E. Pedestrian Accommodations.

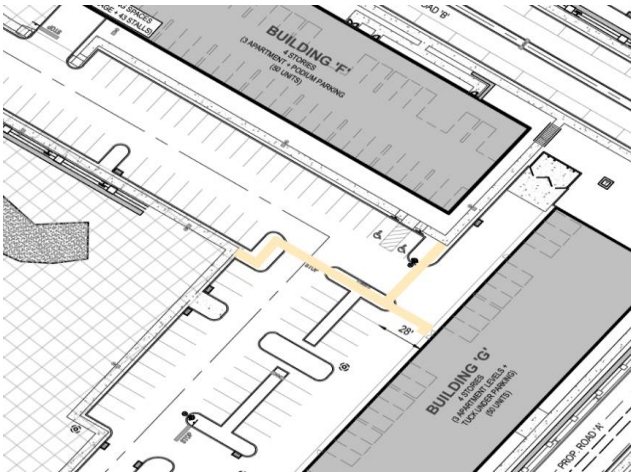
1. The proposed plan would leave no room for pedestrian accommodations in key locations, due to the proposed locations of retaining walls, steep slopes, and vehicular circulation areas. The applicant should downsize or relocate some of these areas to allow for reasonable accommodations for pedestrians in key area. The one public street abutting the site is Evergreen Road; the applicant's plan would provide no sidewalk along that road.

2. Trails, sidewalks and/or walkways shall provide safe pedestrian access from the street front sidewalks to all appropriate areas within the site, including but not limited to parking lots, building entrances, public transportation amenities, and points of interest [§250-158.18]. The proposed recreation facility and hotel should be accessible by sidewalks; the sidewalk in front of proposed Building D should be extended to proposed Road C, and proposed Building G should be connected to the sidewalk network along proposed Road D and the large proposed open space area (see images, below).

3. Sidewalks are required along the frontage of all roads [§250-18.10]. In addition to Evergreen Road, sidewalk is not proposed along multiple frontages on Proposed Roads A and B.

4. We recommend that sidewalks [§215-18, §250-158.10] more directly connect the two fast food restaurants to Road B and Evergreen Road, rather than requiring a pedestrian to walk on a more roundabout route along Proposed Road B to Proposed Road A to Evergreen Road.





F. Transit Stop. Has the applicant consulted with SEPTA about the possibility of providing a new bus stop for the Route 93 bus closer to the applicant's site? Has the applicant consulted with PART?

OPEN SPACE, RECREATION, STREETSCAPE, AND COMMON AREAS

A. Public/Amenity Space.

1. Public space of 3,967 square feet (the zoning text amendment proposed by Castle Sanatoga, LLC would change this term to "amenity space") is required, in the amount of 1,000 square feet for every 30,000 square feet of nonresidential building area. At least 1,983 square feet of that (50%) shall serve as a plaza, square, or courtyard.

B. Open Space and Public Space.

1. Open space facilities shall be located a minimum of 50 feet from buildings and roads. The proposed approximate location of the playground does not meet this requirement [§250-158.12].

2. Urban garden. An urban garden of a minimum size of 300 square feet is required for nonresidential developments. Where is the urban garden proposed? A minimum of 40% of the garden shall be of plant materials such as trees, vines, shrubs, and seasonal flowers with year-round interest. A water feature and two benches is required. An agreement with the township for public access is required (note: the zoning text amendment proposed by Castle Sanatoga, LLC would eliminate this requirement).

3. The applicant is providing the required public plaza, civic space, square, or courtyard area [§250-158.13]. However, there is no indication that the following amenities, required in these areas, would be provided there:

   a. Public art
   b. Fountains
   c. Benches
   d. Trash and recycling containers
   e. Pedestrian-scale lighting
   f. Sidewalk or pedestrian connection. It appears that the public plaza, civic space, square or courtyard would be disconnected from the sidewalk by five feet [§250-158.13].
   g. Public access agreement (note: the zoning text amendment proposed by Castle Sanatoga, LLC, would eliminate this requirement).

C. Rural or Suburban Public Spaces (or "amenity spaces," as proposed by Castle Sanatoga, LLC's text amendment) In Nonresidential Development

1. These should be labeled on the plan so it is clear of their function.

2. A minimum of two benches, trash and recycling containers, a connection to the sidewalk/pedestrian network, and an agreement with the township for public access are required (the access agreement requirement would be eliminated by the proposed zoning text amendment from Castle Sanatoga, LLC).

D. Recreation Facility Requirements for Nonresidential Areas. Recreation facilities provided for nonresidential areas shall provide for passive recreation pursuits, including but not limited to the features, equipment, and amenities listed in §250-18.13 Recreation facility requirements for nonresidential areas.

E. Trails. An internal trail system shall be provided [§250-158-13].

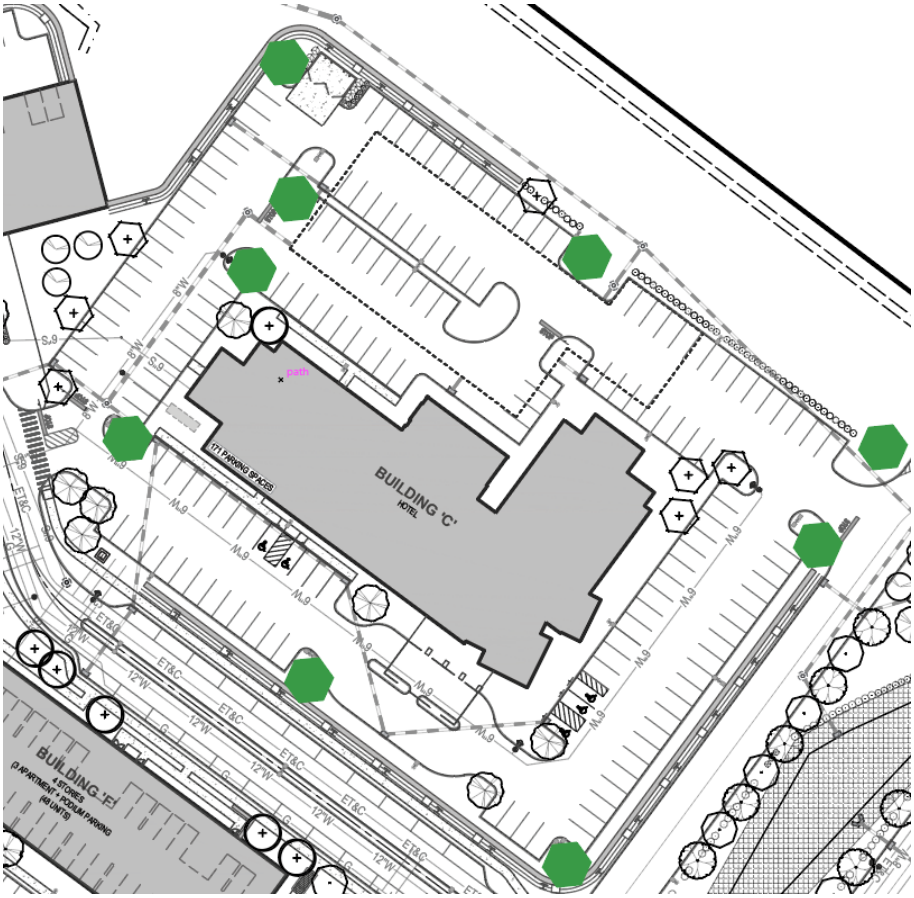
F. Amenities. The applicant shall provide streetscape amenities where practical [§250-158-13].

LANDSCAPING AND STREETSCAPING

A. Steep Slopes. If the slopes near U.S. 422 and other areas are steep, we recommend that plantings be used that do not require mowing, due to the safety hazard for lawn care personnel attempting to mow steep slopes.

B. Parking Lots. Proposed tree canopy is lacking in numerous parking lot areas. There are numerous opportunities to add parking lot canopy trees (see image of parking area surrounding hotel, below, as an example). The green symbols show where trees could be added that would redistribute trees that the applicant proposes grouping and locating outside the parking lot. The locations shown would better distribute trees around the parking lot and would not conflict with subsurface basins (shown by the dashed lines) or lighting fixtures. The SALDO's section on parking lot landscaping says:

> *Parking lots should be effectively landscaped with trees and shrubs to reduce the visual impact of glare, headlights and parking lot lights, to delineate driving lanes and define rows of parking. Furthermore, parking lots should be adequately landscaped to provide shade in order to reduce the amount of reflected heat and to improve the aesthetics of parking lots [§215-51.A].*



SUSTAINABILITY [§25-158.3]

A. Sustainable Building Initiative Points. Buildings, other than hotels/motels, shall implement at least six sustainable building initiative points as outlined in Table 158.6-02.

TRASH

A. Trash Enclosure. The proposed trash enclosure would be a chain link fence with privacy slats—this does not seem architecturally compatible with the building(s), as required by §250-158.15.

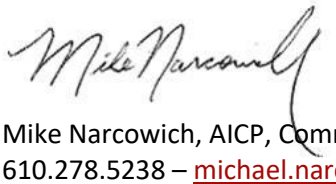
CONCLUSION

We wish to reiterate that MCPC generally supports the applicant's proposal but we believe that our suggested revisions will better achieve the township's planning objectives for mixed-use development.

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. Please print the assigned MCPC number (*#22-0239-003*) on any plans submitted for final recording.

Sincerely,



Mike Narcowich, AICP, Community Planning Assistant Manager II
610.278.5238 – michael.narcowich@montgomerycountypa.gov

c: Montgomery DelVal Association, LP/Sanatoga Land Holdings, LP, Applicant
Eric Britz, P.E., Bohler Engineering PA, LLC, Applicant's Representative
Frank Cebular, Chair, Township Planning Commission
Scott Burton, PennDOT
Fran Hanney, PennDOT
McCarthy Engineers, Township Engineer
Jamie Ottaviano, Esq., Township Solicitor
Michael McGahee, SEPTA
Daniel K. Kerr, Manager, Limerick Township

Attachment A: Aerial Image of Site
Attachment B: Reduced Copy of Applicant's Proposed Site Plan

ATTACHMENT A



Montgomery DelVal Association,
LP/Sanatoga Land Holdings, LP
MCPC#220239003

Montgomery County Planning Commission

0 100 200 400 Feet

N

ATTACHMENT B

