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SCOTT FRANCE, AICP
EXECUTIVE DIRECTOR

August 8, 2025

Ms. Sherri Griffith, Planning/Zoning Administrative Assistant
Upper Pottsgrove Township
1409 Farmington Avenue
Pottstown, Pennsylvania 19464

Re: MCPC #25-0139-001
Proposal Name: Coolidge Commons Townhomes
(1 lot comprising 16.30 acres)
Situate: Wilson Street (north)/west of Farmington Avenue
Upper Pottsgrove Township and Pottstown Borough

Dear Ms. Griffith:

We have reviewed the above-referenced subdivision and land development plan in accordance with Section 504 of Act 247, "The Pennsylvania Municipalities Planning Code," as you requested on July 9, 2025. We forward this letter as a report of our review.

BACKGROUND

The development tract consists of eight parcels of vacant, partially wooded land and one residential parcel totaling approximately 16.3 acres in Upper Pottsgrove Township and Pottstown Borough. The property is located partially in Upper Pottsgrove Township's R-2 Residential, R-4 Residential, and RO Retail Office zoning districts and Pottstown Borough's NB Neighborhood Business and NR Neighborhood Residential zoning districts.

The proposal (see below and the separate PDF) is to construct 65 condominium-style (unlotted) townhouses in 12 buildings. Common open space is labeled on the site plan; however, the acreage of the common open space was not easily identifiable.

Primary access is to be taken from Willson Street through the properties located in Pottstown Borough. Emergency secondary access is taken from an "Unopened" Coolidge Street which is functionally a shared drive between multiple single-family residential properties.

COMPREHENSIVE PLAN COMPLIANCE

COUNTY COMPREHENSIVE PLAN

The plan generally aligns with the goals and objectives outlined in the County Comprehensive Plan, *Montco 2040: A Shared Vision*.

The Future Land Use Component of Montco 2040 indicates that the applicant's property is located in a Suburban Residential Area and identified as areas for development potential on the Development Potential map. According to the Comprehensive Plan, Suburban Residential Areas are defined as places that rely on automobiles for transportation and often feature extensive landscaping on individual properties. Additionally, these areas offer a variety of housing types, with single-family detached homes being the most common.

REGIONAL COMPREHENSIVE PLAN

The proposal mostly aligns with the adopted Pottstown Metropolitan Regional Comprehensive Plan. According to the Upper Pottsgrove Township Future Land Use Map, the subject tract is located within a designated Secondary Growth Area, classified as an area of suburban, single-family residential development.

Regarding future land use policies outlined in the Regional Comprehensive Plan and its land use categories, it is recommended that, to preserve the rural countryside as much as possible, infill development in the Borough of Pottstown and the region's older suburbs is strongly encouraged. Additionally, new large-scale development of medium-density residential projects should be directed to designated growth areas within each township, including the region's Primary Growth Areas, Secondary Growth Areas, and Regional Core, where essential infrastructure is already in place or has been designated as a sewer growth area in the municipality's sewer facilities plan.

The Montgomery County Planning Commission (MCPC) notes that the development goals outlined in the Regional Comprehensive Plan promote medium-density development that is well-designed and creates a sense of place. The plan states that "such developments may include central greens, landscaped cul-de-sacs, sidewalks, and other pedestrian-oriented design features." It appears that the applicant's plan may not fully align with these objectives. Issues related to providing centrally located open space, as well as vehicle and pedestrian access and street trees, may need to be addressed.

RECOMMENDATION

MCPC supports this proposal regarding its consistency with the land use policies found in the County and Regional Comprehensive Plans; however, during our review, we found the following issues that the applicant and municipality may want to consider before final plan approval

REVIEW COMMENTS

STORMWATER MANAGEMENT ORDINANCE COMPLIANCE

A. General Requirements for All Types of Basins. (§301-51.A.(1)). According to the plan, stormwater management facilities are proposed on the site. Standards outlined in the Municipal Code require a 50-foot setback from all property lines and structures. Proposed stormwater basins "Infiltration Basin #1" delineated on the plan does not appear to meet these requirements.

SUBDIVISION AND LAND DEVELOPMENT ORDINANCE COMPLIANCE

A. Road System (§310-19.A.(10)). It appears that access to this planned development shall be obtained from a single access point along Wilson Avenue, which is in Pottstown Borough. There is no public access from Coolidge Street which is in Upper Pottsgrove Township. Our office cautions that township requirements governing subdivision layout and access specify that "all subdivisions and/or land developments containing 25 or more single-family or two-family building lots shall be served by a minimum of two separate roads, from a state or local road, each providing ingress and egress to the development."

B. Conformity with Topography (§310-19.A.(3)). The submitted plan proposes a rectilinear road layout that does not conform with the existing topography of the site. The proposed road layout will require excessive grading to cross the existing stream. This alignment also requires a 21.39-foot height retaining wall with the stream culverted under private Road A. The road layout does not comply with municipal regulations for conformity with topography. As outlined in the Subdivision and Land Development Ordinance (SALDO), Conformity with Topography. Roads shall be adjusted to the contour of the land so as to produce usable lots and roads of reasonable grade, alignment and drainage.

C. Dead-End Roads (§310-19.A.(7)). The submitted plan proposes three "Private Drives" A, B, and C that all dead end with no cul-de-sac bulb. The road layout does not comply with municipal regulations for street design. As outlined in the SALDO, dead-end roads are prohibited, unless designed as a cul-de-sacs or for future access to neighboring tracts in accordance with the requirements of Subsection D(1)(d) of this section.

D. Parking Areas (§310-20.C.(2)). Proposed parking areas for 44 cars are positioned perpendicular to the roads is shown on the plan along the Private Drives A, B and C. Our office notes that the SALDO prohibits such an arrangement. It states that "at no time shall angle or perpendicular parking along the curbs of local, public or private access roads be permitted except where permitted by Township ordinance."

E. Preservation and Protection of Existing Vegetation (§310-37.C.(4).(a)). The requirements outlined in the SALDO specify that "all trees six inches or more DBH (Diameter at Breast Height) should not be removed unless within the proposed right-of-way line of a road or impractical for development as specified." We note that, according to the Existing Features Plan, the submission does not clearly identify all mature trees on the subject tract. Although some trees are identified to be removed, large area of "wooded areas" are also being removed. It is likely large trees above 6-inch Diameter at Breast Height (DBH) are being removed in those wooded areas. If any such trees are present on the site, they should be marked or labeled on the plan.

F. Tree Replacement Planting Requirements (§310-37.C.(1).(b). The plan should comply with all relevant tree replacement planting requirements in the SALDO. As specified, "each mature tree of eight up to 18 inches DBH (Diameter at Breast Height) which is designated 'to be removed,' as outlined above, shall be replaced with one tree of not less than 2½ inches in caliper at the time of planting." Additionally, "calculation and estimation of existing trees shall be performed before any clearing commences and shall be documented on the plan" and "proposed replacement tree plantings shall be listed on the plan."

G. Sidewalks and Curbs (§310-21.A.(1)). Township regulations state that "sidewalks shall be provided along all roads in residential zoning districts, except where, in the opinion of the Board of Commissioners, they are not necessary for the public safety and convenience." There are no sidewalks proposed within the development or along Wilson Street.

H. Street Trees (§310-37.D.(3).(e)). Standards for street trees, outlined in the SALDO, require that trees be planted "along all existing streets when they abut or lie within the proposed subdivision or land development." Additionally, "trees shall be planted at a rate of at least one tree per 40 linear feet of street frontage or fraction thereof...and...shall be distributed along the entire frontage of each property, although they need not be evenly spaced." The plan does not appear to meet this requirement.

ZONING ORDINANCE COMPLIANCE

A. Steep Slope Conservation District/Uses Permitted by Special Exception (§350-41.G). As shown on the submitted plans, areas of steep slope, as defined in the Zoning Ordinance, are present on the applicant's property. Therefore, MCPC notes that municipal regulations require the Zoning Hearing Board to take action for a special exception to allow roads, access driveways, and parking facilities, but only when no practical alternative alignment or location is available in such delineated steep slope areas.

B. Steep Slope Conservation District/Prohibited Uses (§350-42.A). Township regulations for the Steep Slope Conservation District prohibit "freestanding structures, buildings, and retaining walls, unless no alternative alignment or location is feasible" in areas with steep slopes. It seems that the proposed Private Road A encroaches upon the designated steep slopes.

DESIGN ISSUES

A. Secondary Access. As mentioned, municipal requirements in the SALDO mandate that all subdivisions and land developments with 25 or more single-family or two-family lots must be served by at least two separate roads. Accordingly, MCPC recommends considering how this planned development could connect to the adjacent Coolidge Street to the north. We note that Coolidge Street needs to be improved to accommodate additional vehicular traffic but according to the development plan, such an extension seems logical, and the feasibility of this road connection should be explored.

B. Pedestrian Access and Circulation. The plan seems to lack an effective internal pedestrian circulation system that would allow walking throughout the entire subdivision. For instance, there are no sidewalks planned to connect to the proposed open space area from ADA parking spaces. We recommend considering a more comprehensive pedestrian circulation system on the property.

In a related matter, MCPC recommends that the applicant consider the potential needs of families with school-age children who require safe access to a school bus stop, likely located along Willson Street. A continuous sidewalk could help improve pedestrian travel.

C. Planting Design/Street Trees. MCPC recommends a full residential street treatment on the development tract, including continuous sidewalks, a planting strip, and street trees. While shade trees are planned along the cul-de-sac road, the plan does not fully meet landscape requirements in the SALDO.

D. Open Space Area. The applicant's engineer has delineated an unspecified square footage as an open space area with a pavilion and playground on the submitted plan. It is unclear how this area will function and be utilized by future residents and the broader community. Thera are not plans or details regarding the play equipment, pavilion or sidewalks to access the area. The area is also located at the northern perimeter of the property. MCPC recommends that the open space be fully integrated into the development, rather than being "leftover space."

The project should include open space areas that can be considered "usable" and feature amenity areas for both active and passive recreation. Additionally, such open space should be centrally located on the site, if feasible, and easily accessible via sidewalks or paved trails.

The applicant should also specify how the proposed common open space will be used. If active recreation features (such as ball fields or courts) or passive recreation areas (such as sitting areas) are planned, details about where these activities will occur should be reviewed with the township.

E. Design Standards for Townhouse Development/Building Articulation. The plan shows townhomes along a proposed cul-de-sac. While acceptable, we recommend that municipal officials focus on the architectural design of these units and their visual impact on the street.

The overall design of a development plays a crucial role in creating an attractive and desirable townhouse community. Townhouse buildings, typically large structures with extensive façades and substantial massing, usually consist of three to six linked units in a row. Without careful attention to design, these buildings can appear overwhelming or monotonous. However, by incorporating well-articulated façades, engaging visual

interest, and thoughtful architectural details, developers can transform these structures into inviting, eye-catching, and highly desirable residences.

Well-articulated buildings enhance visual interest and create rhythm in the streetscape. A common issue is that many townhouse developments feature buildings with relatively flat façades, with only slight variations between units to distinguish each home, such as a staggered building façade. Articulation, which refers to the variation in appearance and structure within a building's façade, is often achieved through features such as porches, porticos, balconies, bay windows, rooflines, and the use of different building materials. This is especially important in townhouse designs, given the broad width of the façade.

F. Design Standards for Townhouse Development/Garages. Additionally, consideration should be given to the design of garages, which are another element of the façade. MCPC recommends pairing front-loaded garages and incorporating architectural features, such as windows or other decorative elements. Finally, garage doors should be recessed from the rest of the front façade unless the front door has a covered patio or portico structure or is accessed by a stairway.

TRANSPORTAION AND ACCESS

A. Singular Point of Access. The proposed development is designed with a single point of vehicular access for 65 townhomes to a public street, Wilson Street in Pottstown Borough. An emergency-access-only driveway is shown connecting the northern portion of the development to an unopened paper street (known as Coolidge Street) that connects to Farmington Avenue in Upper Pottsgrove Township. With the intensity of the proposed development and the number of dead-end driveways within the development, our office feels that it is important to design the vehicular connection to Coolidge Street to serve as a full street and secondary access to the site to ensure safe and efficient access to the development year-round. Additionally, cul-de-sacs should be incorporated into the dead-end Private Drives B and C for the emergency and waste removal vehicles to safely turnaround rather than backing up the entire length of the street.

Additionally, because the only access through Pottstown Borough to Willson Street, a Traffic Study should be conducted and provided to Pottstown Borough so they can make a decision on allowing access to Willson Street.

ENVIRONMENTAL

A. Protecting the Stream. Due to the proximity of a proposed 21-foot high retaining wall, we recommend that measures are taken to protect the hydrology of the stream. This could include a site redesign that creates a larger riparian buffer area for the stream, or if the proposed design remains, the existing vegetation should be protected and additional riparian vegetation could be planted to protect the stream. Special consideration should be taken for the areas near the stormwater discharge outfalls to protect the riparian buffer and reduce the risk of erosion.

B Culvert. The township should ensure the proposed culvert is large enough to handle the existing flows from storm events and also takes into consideration the risk of more extreme storm events the region is experiencing.

MISCELLANEOUS

A. Assignment of MCPC Number. When an application is submitted to the county for review, a staff member must assign a unique nine-digit identifier to the plan, known as an MCPC number. Therefore, we inform you that "25-0139-001" has been reserved for this submission. To streamline the plan recording process, any

plans brought to this office for recording should always include the MCPC number on the relevant sheets in the area designated for the agency's seal.

B MCPC Design Guidelines Publication, Building Better Townhouse Communities. MCPC has released a report titled *Building Better Townhouse Communities*, which provides suggestions, recommendations, and best practices related to townhouse developments. We encourage municipal officials and applicants to download this document from our website *(https://www.montgomerycountypa.gov/1459/Publications)* to understand the county's land development policies for this type of development.

Important sections include Townhouse Design Elements and Best Practices, open space (page 11), garage design standards (page 29), parking standards (page 30), and garage design options (page 33).

CONCLUSION

We reiterate that MCPC generally supports this application for use and type of development; however, it is recommended that township officials consider the issues raised in this letter.

Please note that the review comments and recommendations in this report are advisory to the municipality, which will make the final disposition regarding the approval of any proposal.

Should the governing body approve a final plat of this proposal, the applicant must present the plan to our office for seal and signature before 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,

Geoffrey Vaughn, PLA, ASLA - Design Section Manager
geoffrey.vaughn@montgomerycountypa.gov - 610-278-3751

c: Coolidge Commons LP, Applicant
McCarthy Engineering, Applicant's Engineer
Michelle L. Reddick, Township Manager, Upper Pottsgrove Township
Peter Eisenbrown, Engineer, Upper Pottsgrove Township
Eric Frey, Solicitor, Upper Pottsgrove Township
Justin Keller, Manager, Pottstown Borough

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



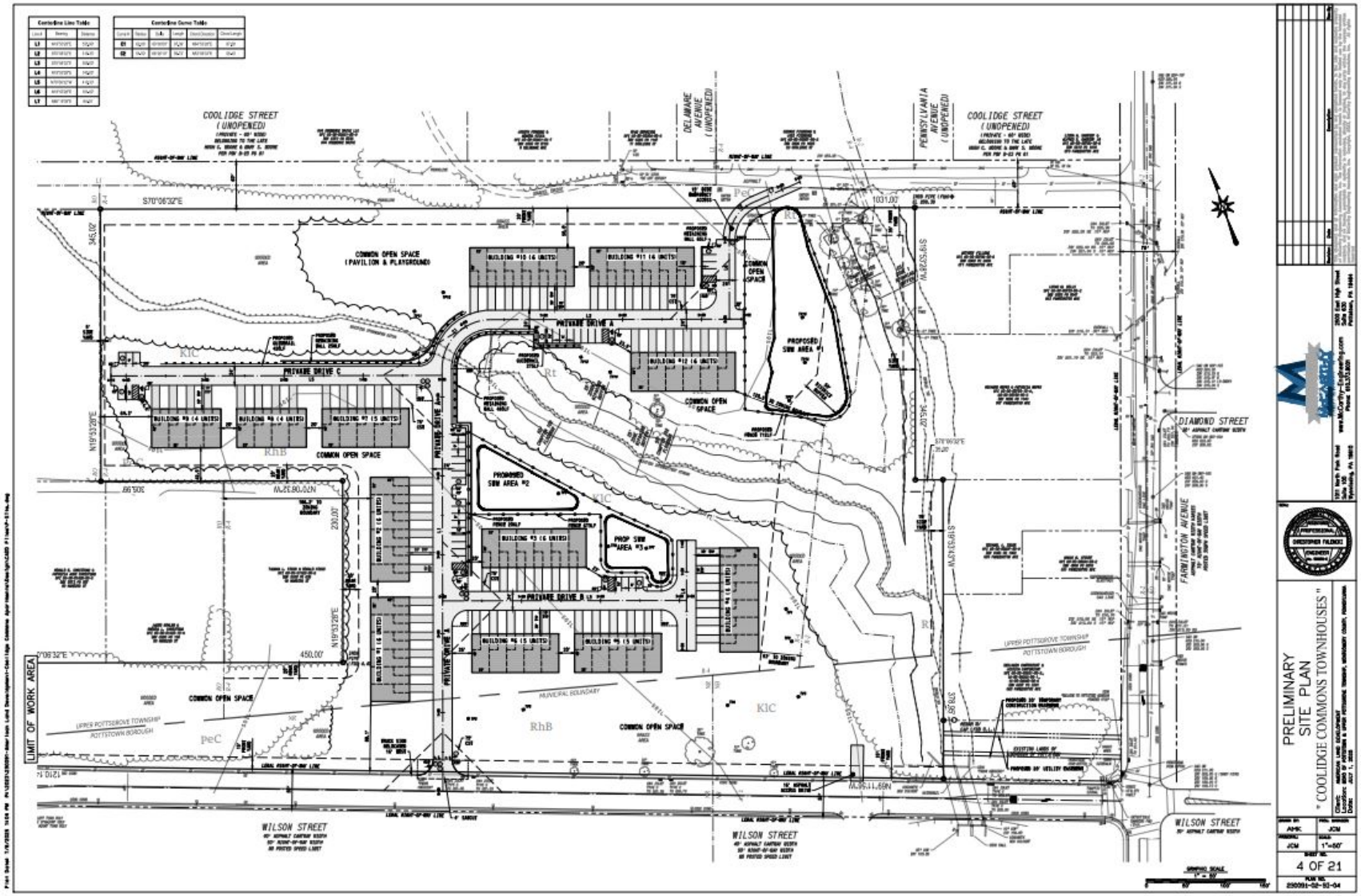
Coolidge Commons Townhouses
MCPC#250139001

Montgomery County Planning Commission

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Aerial photography provided by Nearmap


COOLIDGE STREET (UNOPENED)
DELAWARE AVENUE (UNOPENED)
PENNSYLVANIA AVENUE (UNOPENED)
COOLIDGE STREET (UNOPENED)
COMMON OPEN SPACE (PAVILION & PLAYGROUND)
PRIVATE DRIVE A
PRIVATE DRIVE B
PRIVATE DRIVE C
PROPOSED SIGN AREA #1
PROPOSED SIGN AREA #2
PROP SIGN AREA #3
DIAMOND STREET
FARMINGTON AVENUE
WILSON STREET
WILSON STREET
WILSON STREET
LIMIT OF WORK AREA
COMMON OPEN SPACE
UPPER POTTSGROVE TOWNSHIP
POTTSTOWN BOROUGH
MUNICIPAL BOUNDARY
PRELIMINARY
SITE PLAN
" COOLIDGE COMMONS TOWNHOUSES "
4 OF 21