



PLANNING REPORT

Date: August 12, 2024
To: Noah Marlier, Esq.
From: Golda Speyer, AICP, NJPP, PMP
Applicant: Hamilton Estate

SUBJECT: CONDITIONAL USE REVIEW 204 & 228 STRAFFORD AVENUE, 18 FORREST LANE RADNOR, PENNSYLVANIA

The purpose of this report is to provide planning guidance in its review of a development proposal at 204 Strafford Avenue / 228 Strafford Avenue / 18 Forrest Lane (the "Site"), submitted by Hamilton Estate (the "Applicant").

The Applicant proposes to construct 38 townhomes on a +/- 7.5 acre multi-tract of land fronting Strafford Avenue and Eagle Road. The Applicant is seeking Site Plan approval, Subdivision approval (for a lot merger), and Conditional Use approval.

As this report will summarize, the Township adopted regulatory zoning and conditional use development requirements at the Applicant's subject site, where the application is not in full compliance and/or further clarification is required to determine compliance (see Section III and Appendix "A" of this report). Furthermore, the Township's Comprehensive Plan contains several elements where the development is inconsistent and/or further clarification is recommended (see Section IV).

This report is organized as follows:

- I. Zoning 2
- II. Proposed Conditional Use ("Density Modification Development") 3
- III. Variance Analysis 4
- IV. Municipal Comprehensive Plan Review 6
- V. Conclusion 9
- Appendix "A" – Zoning Requirements 9
- Appendix "B" – Proposed Open Space (Annotated) 14
- Appendix "C" – Radnor Historic Society Photograph 14
- Appendix "D" – Documents Reviewed 16

I. Zoning

The subject Site is located within the R-4 - Low-Medium Density Residential¹ zoning district. In the R-4 zone, the following use regulations apply:

A. Permitted Principal Uses (permitted use by right):

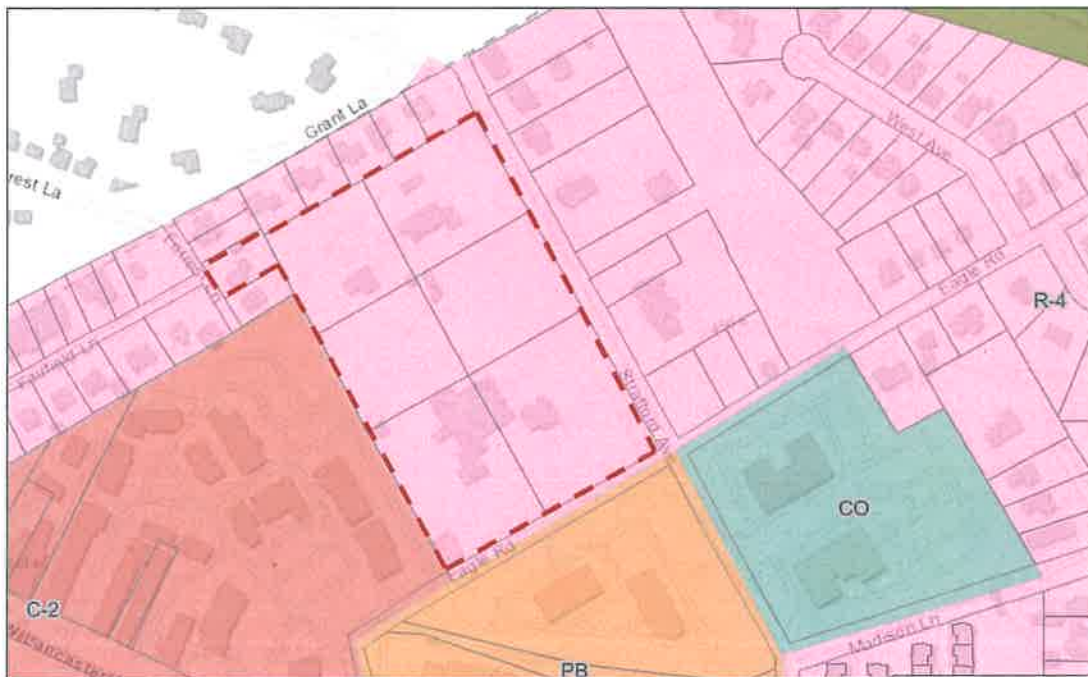
1. Single-family detached dwelling (as cross referenced to the R-3 District)

B. Special Exception Uses (subject to the Zoning Hearing Board review):

1. Student home
2. Church or similar places of worship (as cross referenced to the R-3 District)
3. Conversion of a dwelling to two-family or multifamily use (as cross referenced to the R-3 District)

C. Conditional Uses (subject to the Governing Body review):

1. Density modification development, in accordance with the requirements of Article XIX²



Source: Radnor Township Zoning Map³

1 <https://ecode360.com/11078620>

2 <https://ecode360.com/11079447#11079447>

3 <https://arcg.is/8Wmqr>

II. Proposed Conditional Use (“Density Modification Development”)

- A. **Proposed Conditional Use and Intent:** The Applicant proposes to construct 38 townhomes, which has been filed as a “Density Modification Development” conditional use. We note that the Radnor zoning ordinance does not define⁴ “Density Modification Development,” whereas the zoning regulations does provide objectives and interpretation:

“It is the intent of this article to provide for modification of lot area, yard and use requirements in certain zoning districts in connection with single-family dwelling development for the purpose of accomplishing the following objectives:

1. *To encourage conservation and use of open space in new residential development.*
2. *To encourage land development which preserves trees and natural topography, prevents soil erosion and promotes the best interests of the Township from an aesthetic, ecological and natural resource standpoint.*
3. *To encourage attractive arrangements of dwellings by permitting the design and layout of dwellings to be closely related to the physical characteristics of the site in harmony with surrounding tracts.” (§ 280-90).⁵*

- B. **Conditional Use Review Process:** Conditional uses are unique insofar that they require the municipal governing body as part of the regulatory process to “decide requests for such conditional uses in accordance with such standards and criteria.” (53 Pa. Stat. § 10913.2).⁶ More specifically, in Radnor Township, Article XXIII⁷ of the zoning ordinance provides specific guidance on conditional use submission procedures and standards.

The Radnor zoning ordinance grants powers to the governing body (“Board of Commissioners”) to review an application for Density Modification Development in the R-4 District to confirm the purposes and requirements under Article XIX⁸ are met. In other words, the “Density Modification Development” use was contemplated in the R-4 zoning district as a land use where a heightened regulatory review process shall be followed to ensure sound planning, necessary safeguards, and avoidance of substantial impact upon the community are in place.

§ 280-134⁹ stipulates Radnor’s Board of Commissioners intent and role in the review process:

“This chapter provides for certain uses to be permitted within the Township as conditional uses. In so providing, the Board of Commissioners recognizes that these uses may or may not be appropriate at every location within any specific district and, accordingly, has established standards and criteria by which it can evaluate and decide upon applications for such uses. It is intended that these uses, constituting major uses having the potential for substantial impact upon the community, shall comply with the standards for conditional uses hereinafter set forth, in addition to the relevant stipulations of the district in which the conditional use is authorized.

⁴ <https://ecode360.com/11078361#11078361>

⁵ <https://ecode360.com/11079448>

⁶ <https://casetext.com/statute/pennsylvania-statutes/statutes-unconsolidated/title-53-ps-municipal-and-quasi-municipal-corporations/part-i-general-municipal-law/chapter-30-pennsylvania-municipalities-planning-code/article-ix-zoning-hearing-board-and-other-a>

⁷ <https://ecode360.com/11080009#11080009>

⁸ <https://ecode360.com/11079447#11079447>

⁹ <https://ecode360.com/11080010>

In the sole discretion of the Board of Commissioners, failure to comply with these standards may be deemed a basis for denial or for the imposition of appropriate conditions upon a grant of approval” (emphasis added).

Lastly, the following standards of § 280-137¹⁰ apply in evaluating and acting upon an application for conditional use approval:

“1) The proposed use shall meet all of the specific standards and regulations for eligibility which are contained in the section of this article that authorizes the proposed conditional use.

2) The proposed use shall meet the standards set forth in § 280-145¹¹ that otherwise apply to the review of special exception and variance applications.”

III. Variance Analysis

As proposed, the Applicant may require variance relief from enforcement of Zoning Chapter 280. This office reviewed a limited portion of the Subdivision of Land Chapter 255 for purposes of site design requirements that may implicate further compliance with Zoning Chapter 280 standards.

Zoning review was compared against the site plan prepared by Site Engineering Concepts, LLC revised January 29, 2024.

For a full table of zoning standards applicable to the application, please see Appendix "A".

A. Conditional Use Standards Variances / Further Clarification Needed:

1. **§ 280-94: Building Height:** 35' maximum is permitted, where only limited architectural renderings have been provided that do not confirm compliance. Applicant should demonstrate height compliance in accordance with the definition of “building height” as defined in the Radnor ordinance¹²:

“The vertical distance from the average grade (the average of the grades taken at twenty-foot intervals around the building perimeter) to the top of the highest roof beams of a flat roof or to the mean level of a sloped roof, provided that chimneys and spires shall not be included in measuring the height. Elevator, stair and equipment penthouses, tanks and air-conditioning towers shall not be included. The height shall be measured from finished grade, but such measurement shall not be made from a point higher than eight feet above original grade.”

2. **§ 280-93: Townhome Design:** Each townhouse shall have at least one plan element on any floor which projects or recedes within the wall plane of the facade a minimum dimension of two feet, where architectural floor plans have not been provided to confirm compliance (only limited renderings).

3. **§ 280-91: Common Open Space:**

See Appendix “B” for the Applicant’s proposed open space plan with annotated notes.

- a. *“Not less than 25% of the tract area shall be designated in the subdivision or development plan as common open space. Common open space may not include required buffer yards, floodplain or wetlands. No more than 10% of the required common open space may be used to meet the plan’s stormwater management*

¹⁰ <https://ecode360.com/11080035>

¹¹ <https://ecode360.com/11080064>

¹² <https://ecode360.com/11078361>

requirements, and all required common open space shall be contiguous unless the Board of Commissioners approves otherwise.”

The zoning chart states that 6,654 SF (7.9%) of open space will include stormwater management facilities. However, it is unclear if all proposed SWM infrastructure areas are physically depicted on site plan to verify calculation methodology (infiltration beds depicted, where further SWM construction details are shown on sheet 7 may not be on the plan).

Square footage of open space with SWM facilitate and structures calculation methodology should be shown, which by ordinance includes “Man-made object having an ascertainable stationary location on or in land or water whether or not affixed to land” (i.e. underground manmade structures).

- b. *“Common open space shall be land which is appropriate and in suitable condition for recreation, park site, school grounds, woodland conservation, or other similar recreation or open-space purpose.”*

Amended Conditional Use Plan Set (Civil Site Plan) revised on January 29, 2024 has eliminated the Landscaping Plan in favor of a plan prepared by Glackin Thomas Panzak. Depicted open space area appears limited to a 4FT path, and otherwise unprogrammed from recreational amenity features to utilize the area (i.e. benches, picnic tables, pergolas, playground equipment, etc.). Furthermore, without confirmation that all underground SWM structures are depicted on the plan, it is unclear if outdoor amenity structures may be installed (i.e. impact to necessary footings, compliance to potential deed restrictions, etc.).

Site plan depicts areas that may not meet the intent of open space requirements:

- Areas in between the units break the contiguous space from the main center area, which are less likely to have user activity in programming (particularly areas close to parking and Drive B).
- Areas include side and rear yards abutting residential units, where user activity will likely refrain from using due to privacy / proximity to resident properties.
- Due to property line extended to center of Strafford Ave, the 30FT property line buffer requirement commences much closer to street than ordinance may have intended.
- Open space overall is limited in program (1 short circular path) where likelihood of installing amenity fixtures may be unfeasible due to noise and proximity of open space to resident units. Users may likely stand back from properties and street, thus overall limiting the open space to a smaller portion of usable space.

See “Appendix B” for annotated notes.

- c. *“The common open space shall be contiguous to the development and not be separated from the tract by existing roads.”*

See bullet points #1 and #2 in Part B above where areas of open space included spaces in between townhomes, and areas against parking spaces and Roadway B which are less likely to be utilize contiguously with main open space area.

- d. *“Consideration shall be given to the arrangement and location of common open space to take advantage of physical characteristics of the site and to place common open space within easy access and view of dwelling units, at the same time preserving and enhancing natural features. Areas set aside for common open space shall contain no structure other than a structure related to outdoor recreational use.”*



Any proposed above or below ground SWM meets the definition of Structure¹³. See response to Requirement A above confirming infrastructure location.

- e. Part E deferred to Attorney.
- f. *“Common open space, within the meaning of this article, shall consist of a parcel or parcels of land or an area of water, or a combination of land or water, within a development site, designed and intended for the use or enjoyment of residents of the development or the public, not including streets, off-street parking areas and areas set aside for public facilities.”*

See bullet points in Part B above where the proposed open space is largely unprogrammed from recreational amenity features, and further include spaces in between townhomes, against parking spaces and Roadway B which are less likely to be utilize contiguously with main open space area.

- g. *“There shall be a buffer of 25 feet along all property lines which abut residentially zoned districts which shall not contain any roads, structures, parking areas, etc., and shall be planted in accordance with a plan which shall be approved by the Board of Commissioners at the time of final approval. This buffer strip shall not be counted as part of the common open space.”*

Buffer of 25' against residential property lines are depicted on the plan.

B. Zoning Variances / Further Clarification Needed:

1. **§ 280-103: Parking:** 2 spaces per dwelling units are required (76 spaces total), where 5 surface spaces are shown but no architectural floor plans are provided to confirm if garages have adequate space and compliant dimensions (9.5' x 20' spaces per subdivision ordinance). Additionally, some driveways appear deficient of 20' in length for parking space compliant dimension verification (if being used towards parking calculation).
2. **§ 280-104: Loading:** A loading space on the premises is required for non commercial structures exceeding 5,000 square feet or more of net floor area. No loading space is depicted on the site plan.
3. Full subdivision ordinance street / parking facilities review should be conducted on the revised submission by a licensed engineer to confirm further compliance with Chapter 250.

IV. Municipal Comprehensive Plan Review

- A. **Board of Commissioners Role in Comprehensive Plan Review:** To accomplish the land use objectives within the Density Modification Development conditional use, development plans shall be reviewed in conjunction with the municipal Comprehensive Plan, where such plans would be:

“[A]pproved by the Board of Commissioners [to determine they] meet the purposes and requirements of this [Density Modification Development] article. It is not intended that every tract of land is adaptable to the purposes of this article, and therefore the Board of Commissioners may disapprove an application upon any tract which, in its judgment, should be developed under the other provisions of this chapter. This article is based upon and shall be interpreted in relation to the Comprehensive Plan adopted by the Board of Commissioners”¹⁴ (emphasis added).

¹³ <https://ecode360.com/11078427#11078427>

¹⁴ <https://ecode360.com/11079453>

B. **Consistency Review of the Comprehensive Plan:** A Comprehensive Plan is a document intended to guide local policies relating to land use, development, and infrastructure improvements in the municipality. In other words, the document serves as a “blueprint” for future development objectives and outlines potential amendments to the municipal zoning ordinance.

Radnor has adopted its “Township Comprehensive Plan”¹⁵ in 2003 and is currently undergoing a new Comprehensive Plan update.¹⁶

The below table illustrates a consistency review of the Applicant’s proposed project against the most recent, 2003 Comprehensive Plan for consideration:

PLAN SECTION	RELEVANT OBJECTIVE	CONSISTENCY REVIEW
Section 3: Housing ¹⁷	<i>“Ensure that redevelopment within established neighborhoods is compatible in scale and character. Enact regulations to manage and control monsterization.” (Page 3-23).</i>	Applicant has not provided architectural floor plans, full elevations or square footage breakdowns. This hinders the ability to assess the proposal’s conformity against the surrounding established neighborhood in terms of compatibility, massing and character. For neighborhood context, while the west and south are commercial uses, the north and east are established residential neighborhoods primarily consisting of suburban detached single-family homes. The architectural style of these homes are a mixture of the Colonial and Craftsman development era style. Proposed architectural design should best preserve the physical character and fabric of existing nearby neighborhoods. While the Site is not subject to an adopted Historic District, the Board could consider requesting <i>advisory</i> comment from the Radnor Historical & Architectural Review Board.
Section 3: Housing	<i>“Consider a variety of strategies that will promote cluster or conservation design in new land development [...] Amend zoning to include a conservation design option” (Page 3-24).</i>	Ordinance No. 1613 (Adopted October 28, 1975) required the “Density Modification Development” ordinance to stipulate that “not less than fifteen percent (15%) of the tract area shall be designated in the subdivision or development plan as common open space.” As potentially a direct response to this Comprehensive Plan objective (to regulate conservation design in new land development), Ordinance No. 2021-03 (Adopted April 26, 2021) amended the minimum open space requirement to “Not less than 25%... No more than 10% of the required common open space may be used to meet the plan’s stormwater management requirements and

¹⁵ <https://www.radnor.com/government/departments/community-development/community-planning-efforts/comprehensive-land-use-plan>

¹⁶ <https://www.radnor2035.com/>

¹⁷ <https://www.radnor.com/home/showpublisheddocument/12151/637712834859500000>



PLAN SECTION	RELEVANT OBJECTIVE	CONSISTENCY REVIEW
		<p>all required common open space shall be contiguous..."</p> <p>Board should review Table 1.2 in Appendix "A" of this report, where open space requirements are either non-compliant and/or intent may not be met. Board should discuss proposed open space plan and opportunities to better meet the ordinance. It is strongly recommended the municipality consider retaining a Landscape Architect to collaborate with the Applicant in design to meet ordinance intent.</p>
<p>Section 5: Transportation and Circulation¹⁸</p>	<p><i>"Future development should be monitored and regulated so that subsequent traffic generation does not alter the designated function of individual roads unless the design can be upgraded and is consistent with both the future land use and circulation plans. Developments should not cause restrictions on the ease of entering or exiting a roadway from adjacent properties, or increase traffic to encroach upon or exceed the capacity for a road" (Page 5-7).</i></p>	<p>In review of the memorandum by municipal-retained traffic engineer Gilmore & Associates, Inc., dated August 1, 2023, concerns were raised regarding site parking and circulation.</p> <p>We note the Applicant has submitted a response letter dated September 18th, 2023, and January 31, 2024, to which the municipal traffic engineer should confirm responses and revisions are satisfactory.</p> <p>Board should consider the municipal engineer recommendations on site design and whether they impede the Township's ability to achieve future transportation and circulation objectives.</p>
<p>Section 10: Existing Land Use and Land Use Plan¹⁹</p>	<p><i>"Maintain and protect the many small residential neighborhoods that make the Township such a unique community, with attention toward special re-use and re-development strategies" (Page 10-28).</i></p> <p><i>"Work to preserve as many remaining open spaces in the Township as possible through a full range of direct and indirect open space protection strategies." (Page 10-2).</i></p>	<p>The Site contains existing dwellings and structures to be demolished in favor of 38 townhomes. In review of available records, a photograph of 204 Strafford Avenue appears on the Radnor Historic Society website (See Appendix B).</p> <p>While the Site is not subject to an adopted Historic District, the Board could consider requesting <i>advisory</i> comment from the Radnor Historical & Architectural Review Board (and confirm any historic significance of the subject Site). See further discussion above in Section 3, Housing Element.</p> <p>See above discussion in Section 3, Housing Element (Conservation design in new land development).</p>

¹⁸ <https://www.radnor.com/home/showpublisheddocument/12155/637712834872000000>

¹⁹ <https://www.radnor.com/home/showpublisheddocument/12145/637712834838430000>



V. Conclusion

To further advance the purposes and intent of the conditional use / zoning ordinance and Comprehensive Plan, the Board of Commissioners are recommended to enforce Applicant to:

A. General:

1. Pursuant to § 280-134, the Board of Commissioners role is to determine if the conditional use is appropriate at the proposed location. It is encouraged for the Board to consider if this particular Site in this zone specifically promotes the purposes of Radnor Township's planning and zoning policies, and the proposed use will not cause a substantial detriment to the general welfare. Detrimental impacts upon the general welfare should be mitigated to the greatest extent possible.

B. Variance Verification:

1. Applicant should provide floor plan and full elevation plans to confirm proposed development complies with the conditional use height standard, townhome design standards, and garage parking meets ordinance requirements.
2. Applicant and Board should discuss and consider opportunities to better meet the ordinance open space requirements as outlined in this report.
3. Applicant and Board should discuss the loading variance and if the proposed density in relation to demand of deliveries will disrupt traffic flow / public interest.
4. Full subdivision ordinance street / parking facilities review should be conducted on the revised submission by a licensed engineer to confirm further compliance with Chapter 250.

C. Comprehensive Plan Consistency:

1. Applicant should provide floor plan (square footages sizes) and full architectural elevations for evaluation where the design should best preserve the physical character and fabric of existing nearby neighborhoods. While the Site is not subject to an adopted Historic District, the Board could consider requesting *advisory* comment from the Radnor Historical & Architectural Review Board.
2. Floor plans should clarify extent of bedroom breakdown of the units to clarify potential population.
3. Review Table 1.2 in Appendix "A" of this report, where open space requirements are either non-compliant and/or intent may not be met. It is strongly recommended the municipality consider retaining a Landscape Architect to collaborate with the Applicant in design to meet comprehensive plan and ordinance intent.
4. Board should consider the municipal engineer recommendations on site design and whether they impede the Township's ability to achieve future transportation and circulation objectives.
5. While the Site is not subject to an adopted Historic District, the Board could consider requesting *advisory* comment from the Radnor Historical & Architectural Review Board (and confirm any historic significance of the subject Site).

Appendix "A" – Zoning Requirements

Table 1.1: Zoning District + Conditional Use Standards

STANDARD	R-4 ZONE REQUIREMENT	CONDITIONAL USE REQUIREMENT	PROPOSED
Tract Area (Min.)	7,000 SF	5 Acres	7.487 Acres
Lot Width (Min.)	55'	-	55'+ (Strafford Ave) 55'+ (Eagle Road)
Buildings within an existing street right-of-way line (Min.)	-	40'	40'+ (Strafford Ave) 40'+ (Eagle Road)
Front* Yard Setback (Min.) – Strafford Ave	30'	35'	35'+
Front* Yard Setback (Min.) – Eagle Road	30'	35'	35'+
Side* Yard Setback (Min.)	Regulated by detached dwelling	15'	See Footnote* where Board should interpret west and south property lines if side vs. rear yard. 30' setback on west and south property line
Rear* Yard Setback (Min.)	30'	30'	
Riparian Buffer Setback (Min.)	25'	-	Defer to Engineer
Building Area (Max.)	30%	District + 5% = 35%**	23.5%
Impervious Surface (Max.)	40%	District + 5% = 45%**	42.9%
Building Height (Max.)	35'	District = 35'	No Architectural Plans Provided
Density (Max.)	-	5.5 DU/ AC	5.08 DU/ AC
Townhome Design	-	See Table Below	See Table Below
Open Space	-	See Table Below	See Table Below
<p>*§280-4 defines "Yard Requirements for Corner Lots"²⁰ as having "two front yards, one along each street line... one side yard... and one rear yard. The rear lot line shall be designated as that lot line towards which the rear of the principal building is oriented." The rear of principal building is oriented to both the west and south property lines, where it may be considered two rear yards.</p> <p>**§280-94 stipulates "[T]otal area covered by building and impervious surfaces, excluding streets, shall not exceed the percentage of building coverage and impervious surfaces established for the zoning district plus an additional 5%."</p>			

²⁰ <https://ecode360.com/11078437#11078437>

Table 1.2: Conditional Use Open Space + Townhouse Design Standards

CONDITIONAL USE REQUIREMENT	PROPOSED
Townhome Design (§ 280-93)	
Townhouses shall be authorized only when constructed, owned and operated under single ownership or under the Pennsylvania Unit Property Act.	Defer to Attorney
Not more than eight townhouses shall be attached in a single group, and each group of townhouses shall be separated from each other group by at least 20 feet. No more than two contiguous townhouses in any group may be constructed in line, and each townhouse shall have at least one plan element on any floor which projects or recedes within the wall plane of the facade a minimum dimension of two feet.	<p>Maximum of 6 townhouses attached in a single group.</p> <p>Townhouses separated from each other group by at least 20 feet (31' minimum shown).</p> <p>No contiguous townhouses in line.</p> <p>Full Architectural Plans not provided to confirm each townhouse shall have at least one plan element on any floor which projects or recedes within the wall plane of the facade a minimum dimension of two feet.</p>
Common Open Space Design (§ 280-91)	
<p>Not less than 25% of the tract area shall be designated in the subdivision or development plan as common open space. Common open space may not include required buffer yards, floodplain or wetlands. No more than 10% of the required common open space may be used to meet the plan's stormwater management requirements, and all required common open space shall be contiguous unless the Board of Commissioners approves otherwise.</p> <p><i>[81,533 SF of dedicated common open space is required, where a maximum of 8,153 SF (10%) may be used to facilitate SWM requirements.]</i></p>	<p>The zoning chart states that 6,654 SF (7.9%) of open space will include stormwater management facilities. However, it is unclear if all proposed SWM infrastructure areas are physically depicted on site plan to verify calculation methodology (infiltration beds depicted, where further SWM construction details are shown on sheet 7 may not be on the plan).</p> <p>Square footage of open space with SWM facilitate and structures calculation methodology should be shown, which by ordinance includes "Man-made object having an ascertainable stationary location on or in land or water whether or not affixed to land" (i.e. underground manmade structures).</p>
Common open space shall be land which is appropriate and in suitable condition for recreation, park site, school grounds, woodland conservation, or other similar recreation or open-space purpose.	<p>Amended Conditional Use Plan Set (Civil Site Plan) revised on January 29, 2024 has eliminated the Landscaping Plan in favor of a plan prepared by Glackin Thomas Panzak. Depicted open space area appears limited to a 4FT path, and otherwise unprogrammed from recreational amenity features to utilize the area (i.e. benches, picnic tables, pergolas, playground equipment, etc.). Furthermore, without confirmation that all underground SWM structures are depicted on the plan, it is unclear if outdoor amenity structures may be installed (i.e. impact to necessary footings, compliance to potential deed restrictions, etc.).</p>

CONDITIONAL USE REQUIREMENT	PROPOSED
	<p>Site plan depicts areas that may not meet the intent of open space requirements:</p> <ul style="list-style-type: none"> ▪ Areas in between the units break the contiguous space from the main center area, which are less likely to have user activity in programming (particularly areas close to parking and Drive B). ▪ Areas include side and rear yards abutting residential units, where user activity will likely refrain from using due to privacy / proximity to resident properties. ▪ Due to property line extended to center of Strafford Ave, the 30FT property line buffer requirement commences much closer to street than ordinance may have intended. ▪ Open space overall is limited in program (1 short circler path) where likelihood of installing amenity fixtures may be unfeasible due to noise and proximity of open space to resident units. Users may likely stand back from properties and street, thus overall limiting the open space to a smaller portion of usable space. <p>See "Appendix B" for annotated notes.</p>
<p>The common open space shall be contiguous to the development and not be separated from the tract by existing roads.</p>	<p>See bullet points # 1 and # 2 in Part B above where areas of open space included spaces in between townhomes, and areas against parking spaces and Roadway B which are less likely to be utilize contiguously with main open space area.</p>
<p>Consideration shall be given to the arrangement and location of common open space to take advantage of physical characteristics of the site and to place common open space within easy access and view of dwelling units, at the same time preserving and enhancing natural features. Areas set aside for common open space shall contain no structure other than a structure related to outdoor recreational use.</p>	<p>Any proposed above or below ground SWM meets the definition of Structure. See response to Requirement A above confirming infrastructure location.</p>
<p>Common open space shall be made subject to such agreement with the Township and such deed restrictions duly recorded in the office of the Recorder of Deeds in Delaware County as may be required by the Board of Commissioners for the purpose of preserving the common open space for such use.</p>	<p>Defer to Attorney</p>
<p>Common open space, within the meaning of this article, shall consist of a parcel or parcels of land or an area of water, or a combination of land or water, within a development site, designed and intended for the use</p>	<p>See bullet points in Part B above where the proposed open space is largely unprogrammed from recreational amenity features, and further include spaces in between townhomes, against parking spaces and</p>

CONDITIONAL USE REQUIREMENT	PROPOSED
or enjoyment of residents of the development or the public, not including streets, off-street parking areas and areas set aside for public facilities.	Roadway B which are less likely to be utilize contiguously with main open space area.
There shall be a buffer of 25 feet along all property lines which abut residentially zoned districts which shall not contain any roads, structures, parking areas, etc., and shall be planted in accordance with a plan which shall be approved by the Board of Commissioners at the time of final approval. This buffer strip shall not be counted as part of the common open space.	Buffer of 25' against residential property lines depicted on plan.
*Pursuant to § 280-4, ²¹ Structure shall mean "Anything constructed or erected on the ground or attached to the ground including, but not limited to, buildings, sheds, manufactured homes, and other similar items. This term includes any man-made object having an ascertainable stationary location on or in land or water whether or not affixed to land."	

Table 2: General Zoning Regulations

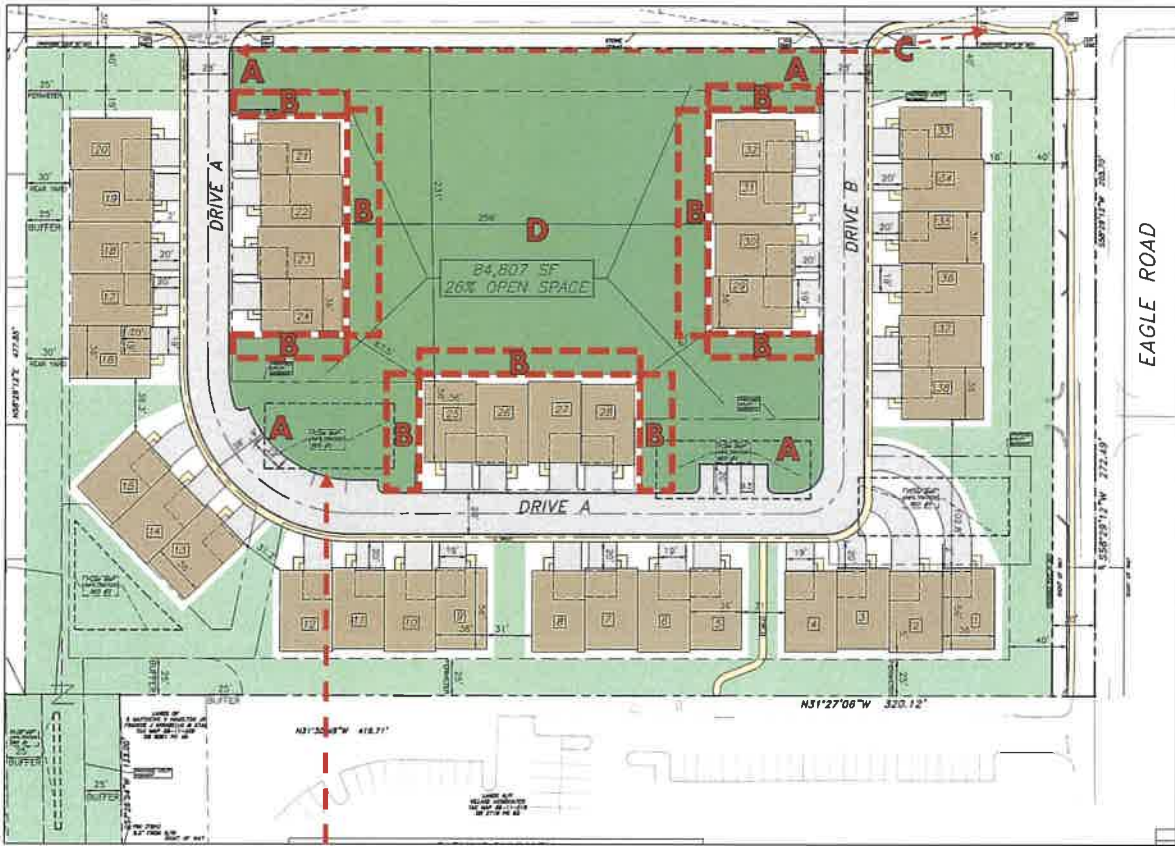
ZONING REQUIREMENT	PROPOSED
Parking Spaces: 2 per dwelling unit (Min.) ²³ <ul style="list-style-type: none"> 38 Units x 2 = 76 Spaces 	No Architectural Plans to confirm garage parking availability.
Parking and Driveway Design ²⁴ <ul style="list-style-type: none"> Parking Space Size (90-Degree): 9.5' x 20' Driveway Aisle (90-Degree): 22' Wide 	Interior garage space sizes are not labeled to conform. Some driveways appear deficient of 20' in length for parking space compliant dimension. Drive/road measures at 28'
Loading Spaces: No building or structure shall be erected in any district unless loading space for the accommodation of trucks is provided on the premises ²⁵ <ul style="list-style-type: none"> Requirement: Non-retail / office buildings more than 5,000 SF Size: 12' W x 30' L 	No Loading Space Depicted on Plans

²¹ <https://ecode360.com/11078427#11078427>
²² <https://ecode360.com/11079456>
²³ <https://ecode360.com/11079548>
²⁴ <https://ecode360.com/11076637>
²⁵ <https://ecode360.com/11079571>

Appendix "B" – Proposed Open Space (Annotated)

Dark green area depicted as Applicant's required open space (minimum of 25% required). Site plan depicts areas that may not meet the intent of open space requirements:

- A) Areas in between the units break the contiguous space from the main center area, which are less likely to have user activity in programming (particularly areas close to parking and Drive B).
- B) Areas include side and rear yards abutting residential units, where user activity will likely refrain from using due to privacy / proximity to resident properties.
- C) Due to property line extended to center of Stafford Ave, the 30FT property line buffer requirement commences much closer to street than ordinance may have intended.
- D) Open space overall is limited in program (1 short circler path) where likelihood of installing amenity fixtures may be unfeasible due to noise and proximity of open space to resident units. Users may likely stand back from properties and street, thus overall limiting the open space to a smaller portion of usable space.



No more than 10% of the required common open space may be used to meet the plan's stormwater management requirements. Zoning chart states 6,654 SF of open space will be dedicated to stormwater management facilities (7.9%). It should be confirmed all proposed infrastructure is depicted on site plan to confirm accurate calculation. Some SWM construction details and pipes on construction plan sets but are not depicted on site plan.



Appendix "C" – Radnor Historic Society Photograph

204 Stafford Avenue



Source: <https://radnorhistory.org/archive/photos/?p=16729>

Appendix "D" – Documents Reviewed

DOCUMENT NAME	PREPARER	# OF PAGES	DATE
Comprehensive Plan	Radnor Township	-	2003
Chapter 280 Zoning Ordinance	Radnor Township	-	-
Conditional Use Application	George W. Broseman, Esq.	37	May 24, 2023
Conditional Use Plan Set / Record Plan	Site Engineering Concepts, LLC	12	August 27, 2020 Revised to January 29, 2024
Neighbor Plan	Site Engineering Concepts, LLC	1	September 6, 2023 Revised to January 31, 2024
Architecture Renderings	Unlabeled	2	Undated
Landscaping and Lighting Plan	Glackin Thomas Panzak	5	May 18, 2023 Revised to March 5, 2024
Eagle Road Elevation Plan	Glackin Thomas Panzak	5	July 19, 2023 Revised to March 7, 2024
Radnor Adjudication	Radnor Township	13	April 16, 2021
Site Context Map	Glackin Thomas Panzak Inc.	1	January 30, 2020 Revised to January 29, 2024
Zoning Map	Glackin Thomas Panzak Inc.	1	January 30, 2020 Revised to January 29, 2024
Drainage Plan	Applicant	4	Undated
By-Right Plan	Site Engineering Concepts, LLC	1	March 20, 2020
Development Impact Statement	George W. Broseman, Esquire Daniel P. Rowley, Esquire	8	Undated
Traffic Impact Study	F. Tavani and Associates, Inc.	57	August 25, 2020
Traffic Investigation	F. Tavani and Associates, Inc.	111	May 15, 2023
Post Construction Stormwater Management Analysis	Site Engineering Concepts, LLC	182	August 27, 2020 Revised to January 31, 2024
PA DEP Mailer & Reserve Capacity Waiting List	HILBEC Engineering & Geosciences, LLC	23	August 24, 2020
Draft Declaration of Planned Community	Applicant	30	Undated
Conditional Use Review(s)	Gannett Fleming	4	November 5, 2020 August 1, 2023
Tree and Landscaping Review Memo	John Rockwell Hosbach, Rockwell Associates	6	July 29, 2023
Tree and Landscaping Response Letter	Glackin Thomas Panzak	6	March 5, 2024
Traffic Engineering Review Memo(s)	Gilmore & Associates, Inc.	3	November 16, 2020 August 1, 2023
Engineering Response Letter	David J. Sanders, P.E., Site Engineering Concepts, LLC	11	September 18, 2023
Traffic Engineering Response Letter	David J. Sanders, P.E., Site Engineering Concepts, LLC	5	September 18, 2023

DOCUMENT NAME	PREPARER	# OF PAGES	DATE
Engineering Supplemental Response Letter	Robert M. Lambert, P.E., Site Engineering Concepts, LLC	11	January 31, 2024
Traffic Engineering Supplemental Response Letter	Robert M. Lambert, P.E., Site Engineering Concepts, LLC	4	January 31, 2024
Adjacent Density Complexes Analysis	Applicant	19	March 20, 2024
Fiscal Impact Analysis	Erik Hetzel, AICP	6	March 18, 2024