



THOMAS COMITTA ASSOCIATES, INC.
Town Planners & Landscape Architects

M E M O R A N D U M

TO: Marple Township Officials
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DATE: July 31, 2015

SUBJECT: **REVIEW COMMENTS - CARDINAL CROSSING TOWNE CENTER
ORDINANCE AMENDMENTS FOR PLANNED COMMUNITY CENTER DISTRICT AND
PLANNED COMMUNITY RESIDENTIAL DISTRICT, DATED MAY 15, 2015**

Enclosed are our Review Comments pertaining to the following documents that we received on June 3, 2015:

- Draft Ordinance "Twp. Submission 1 – May 15, 2015", Amending Chapter 300, Zoning, by adding a new Article V-A entitled Planned Community Center District; and
- Draft Ordinance "Twp. Submission 1 – May 15, 2015", Amending Chapter 300, Zoning, by adding a new Section 300-33A entitled Planned Community Residential District.

Please call or email if there are any questions.



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Please note the following comments pertaining to the documents listed on the Cover Memorandum.

1. Overview of Application

The Cardinal Crossing Towne Center proposes to amend the Marple Township Zoning Ordinance to add two new districts: a Planned Community Center (PCC) District for commercial uses, and a Planned Community Residential (PCR) District for multifamily residential. The current application also proposes to amend the Marple Township Zoning Map to locate the PCC and PCR Districts on a 213 acre tract bound by Sproul Road, Reed Road, Interstate 476, and the Cardinal O'Hara High School property. The site is currently zoned Institutional (INS), Residential-B (R-B), and Residential-C (R-C).

Concurrent with the Zoning Amendment and Zoning Map Amendment, the applicant has submitted a Preliminary Plan comprised of a mixed-use development with a 746,650 square foot retail center, 100,000 square foot medical office building, 80,000 fitness center, a 65,000 square foot hotel, and 303 multifamily units (townhouses and carriage homes). TCA's review of the land development plan application is being submitted under separate cover.

Comments pertaining to the Zoning Ordinance Amendments are found below. These comments are organized into the following categories:

- Overall compliance with the draft Marple Township Comprehensive Plan Addendum;
- Integrated Open Space and Public Realm;
- Natural Resource Conservation;
- Vehicular and Pedestrian Connectivity; and
- Specific standards on the proposed Ordinance.

2. Consistency with the Comprehensive Plan Addendum

A draft Marple Township Comprehensive Plan Addendum, dated June 1, 2015, is currently under review by the Delaware County Planning Department, and promotes the following key policies:

- a. Preserve and enhance the natural, historic, and cultural qualities that make Marple Township a distinct, cohesive community;
- b. Maximize use of existing infrastructure, create walkable neighborhoods, provide housing for all ages, and maintain a diverse tax base;



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- c. Maintain and enhance a connected network of wooded riparian corridors that encourage ecological health, recreational use, and as a key contributor to the Township’s beauty and aesthetics;
- d. Encourage pedestrian access by providing a continuous sidewalk and crosswalk network, enhancing the pedestrian experience through streetscape improvements, and implementing comprehensive traffic calming.
- e. Provide park, open space and/or recreational opportunities within the Mixed-use Growth Areas that will ensure adequacy of recreational opportunities to existing and future residents and employees and adjoining neighborhoods.
- f. Plan for an on and off-road trail system that will connect users to community institutions, facilities and destinations, as well as the planned Delaware County Greenway and its connection to regional recreational assets and destinations.

As designated on the proposed Future Land Use Plan, the subject site is located within a newly termed, “Mixed-use Growth Area”. Development within the Mixed Use growth areas is intended to:

- a. Provide a Mix of Uses;
- b. Balance development with Natural Resource protection;
- c. Create adequate and efficient transportation options;
- d. Respect and enhance adjoining neighborhoods;
- e. Enhance the Township open space network;
- f. Exemplify good design; and
- g. Provide a positive fiscal impact.

In general, the land uses proposed within the Ordinances are consistent with the proposed Future Land Use plan, provided they are developed in accordance with all of the intents of the mixed-use growth areas, listed above. However, the proposed Ordinance Amendments could be strengthened in regards to natural resource protection, enhancing the open space network, and vehicular and pedestrian connectivity.

To better support consistency with the Comprehensive Plan Addendum these items should be specifically included as part of the overall intent of the Ordinance and addressed within the general site



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planning regulations and other sections. Considerations for how to strengthen these elements are detailed in the following sections.

3. Integrated Open Space and Public Realm

A variety of open space types are intended to be provided throughout the proposed Zoning Districts with internal connections, as well as connections to adjoining properties and creating an overall “public realm”, while providing a variety of active and passive recreational opportunities for areas of the Township that are underserved by parkland. Such open spaces, as well as access (trail, sidewalk, path, etc.) should be shown on the proposed Open Space Plan.

3A. *Intent.* Consider expanding the Intent sections of both proposed Ordinances to reference natural resource protection and preservation, pedestrian connectivity, and meeting open space and recreational needs of the Township.

3B. *Percentage of Common Open Space.* We recommend that a minimum percentage of Common Open Space higher than 25% be provided in the PCR District. While understandably a lesser amount of open space would be expected in a nonresidential district, we recommend a greater percentage of open space on the site overall be retained.

3C. *Design of Common Open Space.* We recommend that a variety of open spaces be defined and required as part of the Ordinance and Design Standards. Such open space types could include greens, plazas, pocket parks, tot-lots/mini-parks, etc. Minimum requirements for common open space, such as those currently in the Marple Township Zoning Ordinance 300-18.G. regarding contiguity, minimum size, and configuration could be addressed as part of this Section. Specific details regarding the open space types may be included in the Design Guidelines, but should be referenced as part of the proposed Ordinances for both Districts.

In addition, a list of uses permitted or prohibited within common open space should be provided. This list should specify that Trails are a permitted use.

3D. *Percentage of Useable Open Space.* A percentage of the overall open space should be considered “useable” and, therefore suitable for active recreation. Such minimum Useable Open Space calculation would be a subset of the Common Open Space, but would areas having a grade of no more than 5%, free of environmental constraints, and with a minimum size requirement.

3E. *Open Space Plan Requirements.* To better understand the public realm created by a land development application, the required open space plan description (300-33A(Q)(3)(c) should be expanded to require that the plan depict the open space types, the amount of useable open space, and internal and external sidewalk/trail connections between these spaces.



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4. Natural Resource Protections

The intent of the Comprehensive Plan is to reach a balance between land development and natural resource preservation. This balance should be achieved by preserving the areas with the greatest and highest priority resources in both proposed Zoning Districts.

4A. Tree Protection and replacement. As stated in the Comprehensive Plan Addendum, natural resources that are located together, such as trees and woodlands along a stream corridor, should be given the highest priority for protection and preservation. We recommend the Ordinance require that trees within a minimum of 50 feet of a stream corridor and wetlands be given the highest priority for preservation. These standards should be applied equally to both the PCC and PCR Districts.

4B. New Tree Guarantee. The proposed tree guarantee periods of 12 months (PCC District) and 18 months (PCR District) are less than the existing Marple Township Ordinance requirement of three (3) years. Time periods for tree guarantee should be consistent across both Ordinances and should be discussed further with the Township.

4C. Tree Replacement. We recommend that proposed subsections 300-33F (b) and (c) be removed. It is well documented that trees planted at the smaller 2 to 2-1/2 inch caliper are more likely to survive and thrive than those of a larger caliper. Additional credit for installation of the larger trees should be further discussed with the Township.

4D. Tree Replacement. In the current Marple Township Zoning Ordinance, replacement trees may not be counted toward required buffer and street tree plantings, while the proposed Ordinance would allow replacement trees to count toward these requirements. This variation should be further discussed with the Township.

4E. Stream buffers (riparian buffers). The RMHD Overlay District in the current Marple Township Zoning Ordinance provides precedence for riparian corridor protections. This District requires that a minimum of 150 foot setback from a stream corridor be protected and undisturbed, except for trails. While the 150 foot corridor may not be appropriate for a designated growth area, a degree of riparian protections should be provided in both the PCR and PCC Districts.

5. Connectivity

Vehicular and pedestrian connectivity that connects to and enhances the existing network is a primary goal of the Comprehensive Plan Addendum. Both Ordinances could be strengthened to more specifically state intentions to provide pedestrian facilities and amenities that create a safe, convenient, and attractive pedestrian experience for all users.

5A. Pedestrian Accommodations. Section (3) of the PCC District states where pedestrian accommodations should be provided in a variety of areas. We recommend that this list be expanded to



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include: between interior buildings, parking areas, and green spaces to sidewalks and/or trails along the perimeter of the site and to adjoining sites. A similar section could be added to the PCR District.

6. Design Guidelines

6A. As referenced in the draft Design Guidelines, they are intended to be included as part of the Subdivision and Land Development Ordinance. Therefore, a Subdivision and Land Development Ordinance Amendment should be prepared to set the stage for the inclusion of Design Guidelines in the SLDO.

7. Comments specific to the Planned Community Residential (PCR) District Ordinance Amendment

7A. *Intent.* The Intent of the PCR District should state an intent to be consistent with the Comprehensive Plan of Marple Township, as amended, similar to that provided in the PCC District.

7B. *Design Guidelines:* The Manual of Written and Graphic Design Guidelines should be referenced as an integral part of the Ordinance for the Planned Community Residential District, similar to proposed section 300-38A of the Planned Community Center.

7C. *Density:* The established precedence in the Marple Township Zoning Ordinance is to base density on the “developable acre” (e.g., net density), not the gross acreage. To be consistent with the densities in existing districts, a maximum density based on the developable acre should be provided.

7D. The draft Ordinance proposes that “architectural interest in the arrangement and character of housing fronting streets, variations in housing setbacks will be encouraged.” We recommend a measurable variation be provided. For example “a minimum difference of 2 feet in setback shall be provided for every three (3) houses”. Such measurable standard should be included as part of the Manual of Design Guidelines.

7E. *Building Height.* The method for measuring building height should be consistent with the standard in the existing Marple Township Ordinance or further discussed with the Township.

7F. *Entrance Sign.* The entrance sign provisions should be discussed further with the Township in terms of location and size. Consider designating one “main entrance” to the residential neighborhoods with one set of sign standards, and a second set of sign standards with reduced areas and heights for additional entrances.

7G. We recommend that “shall” be used in lieu of “must” throughout the Ordinance Amendments.



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8. Comments specific to the Planned Community Center District Ordinance Amendment

8A. Permitted Uses. A number of uses could be considered Conditional Uses, rather than By-Right uses, including conference center, places of public amusement, and surgi-centers with inpatient and outpatient services. These uses have a variety of impacts that are best reviewed by the Board of Commissioners on a case by case basis according to the standards of the Marple Township Zoning Ordinance.

8B. Signs. The Township may only be willing consider on-premise signs.

8C. Main Entrance signs. The proposed main entrance signs are more than double anything currently permitted within the Township. Given the context of the site, notably the topography, traffic speeds, and the lack of competing signage across Sproul Road at the cemetery, the size of the main entry sign should be reduced in both total sign area and in maximum height.

In addition, we recommend the freestanding signs permitted for pad sites along Sproul Road also be reduced in size.

Please call or email if there are any questions.