



November 10, 2023
Board of Supervisors
South Park Township
2675 Brownsville Road
Library, PA 15129

**Re: Planned Residential Development Ordinance Amendments
Victor-Wetzel Associates' Comments – (via e-mail)**

Dear Board of Supervisors:

In our review of the proposed Planned Residential Development (PRD's) Ordinance Amendment, I would have the following comments and suggestions in possible revisions to this Amended PRD Ordinance:

1. In the review of the proposed PRD Ordinance, only R-2 and R-3 undeveloped parcels that are located on Arterial and/or Collector streets with a minimum site area of 10 acres qualifies for the PRD use. (The R-4 Zoning sites have been deleted from the Conditional Use for PRD's). Has the Township determined how many Township parcels qualifies for the PRD use? If not, can that be provided?
2. Single-family attached dwelling units have been removed as a permitted use in the R-2 PRD. Therefore, these units are only permitted in a R-3 PRD and the R-4. The majority of the R-4 zoning parcels have developed in the Township, which only leaves R-3 PRD's where single-family attached dwelling units are permitted. Has the Township determined how many Townships' R-3 parcels qualify for these uses?

Under the proposed PRD Ordinance, all R-2 and R-3 PRD's should be located along an Arterial and/or Collector street; therefore, more allowed single-family detached and townhouse units should be included in a R-2 PRD.

3. Item O, on pages 4 & 5 outline the R-2 PRD bulk and area regulations:

R-2 PRD REQUIREMENTS

- a. 10,000 sq. ft. min. lot size
- b. 65-foot min. width
- c. 35% lot coverage
- d. 26.25-foot min. front yard
- e. 22.5-foot min. rear yard
- f. 7.5-foot min. side yard
- g. 2.5 stories max. height

(same PRD requirement for a R-3 PRD as well)

R-2 BASE ZONING REQUIREMENTS

- a. 12,000 sq. ft. min. lot size
- b. 80-foot width
- c. 35% lot coverage
- d. 35-foot min. front yard
- e. 30-foot min. rear yard
- f. 10-foot min. side yard
- g. 2.5 stories maximum height

As shown in the above chart there is not much of a reduction in the minimum lot sizes, lot width and yard setbacks. The minimum lot size was only reduced 83% from the base zoning requirement and there is a PRD open space requirement to provide 25% of the site in open space. The math does not work out. The previous R-2 PRD had NO MINIMUM REQUIREMENTS for the following bulk area regulations:

- Lot size – no minimum requirement
- Lot width – no minimum requirement
- Front setback – no minimum requirement
- Rear setback – no minimum requirement
- Side setback – no minimum requirement

The Lot Coverage Requirement of 35% still remains the same under the new PRD Ordinance. This requirement should be reduced as well.

Additionally, how was the 26.25 ft minimum front yard requirement and the 22.5 ft. minimum rear yard requirement numbers determined in the new PRD Ordinance. Why such an ODD number? Please consider the following minimums:

- 25 ft. Front Setback Line – (20’ for a Age Restricted Community – see below)
- 25 ft. Rear Setback Line

These revised and increased PRD Bulk and Area Regulations are not consistent with the Township Purpose Statement for PRD’s as shown below:

ARTICLE XVIII

PLANNED RESIDENTIAL DEVELOPMENT - SECTION 1800 PURPOSE

The purpose of this Article is to encourage innovations in residential development so that the growing demand for housing may be met by greater variety in type, design and layout of dwellings and by the conservation and more efficient use of open space ancillary to said dwellings and uses; to provide greater opportunities for better housing and recreation; to encourage a more efficient use of land and of public services; and to reflect changes in the technology of land development.

As stated above, the new R-2 PRD Requirement has only been slightly reduced, and still requires 25% open space and the Minimum Lot Coverage still remains at 35%. Consideration should be given to reduce the R-2 PRD Minimum Bulk and Area Requirements.

4. Item P, Page 5, outlines the R-3 PRD Bulk and Area Regulations:

(Note: The R-3 PRD and R-2 PRD regulations are the same requirements. Why are the requirements the same as an R-2 PRD? The R-3 Zoning District is for a High Density single-family Residential District.)

R-3 PRD REQUIREMENTS

- a. 10,000 sq. ft. min. lot size
- b. 65-foot lot width
- c. 35% lot coverage
- d. 26.25-foot min. front yard
- e. 22.5-foot min. rear yard
- f. 7.5-foot min. side yard
- g. 2.5 stories max. height

R-3 BASE ZONING REQUIREMENTS

- a. 10,000 sq. ft. min. lot size
- b. 75-foot. lot width
- c. 40% lot coverage
- d. 30- foot min. front yard
- e. 25-foot min. rear yard
- f. 7.5-foot min. side yard
- g. 2.5 stories max. height

As shown in the above chart, there is little difference between the Base Zoning Requirement and the Proposed R-3 PRD Standards. Why use the PRD when the standards are basically the same AND the development requires 25% Open Space? Consideration should be given to allow a 3 Story Townhouse Unit.

- 5. Has the Township prepared a complete and revised Planned Residential Development Outline for Article XVIII, Section 1800 that takes into account these revisions?
- 6. The Proposed PRD Ordinance has removed the Retirement Community as an allowed use in the PRD. The current definition for the Retirement Community relates more toward a nursing facility with independent care and assisted living. Has the Township and Planning Consultant considered including an Age Restricted Community Conditional Use that could be included in the R-2 and R-3 Zoning District? The Age Restricted Community Conditional Use targets active older adults in a residential developments. The advantage of these communities are:
 - 1. Less Traffic within the development and neighborhood.
 - 2. No maintenance for lawn care (no grass cutting, mulching and leave pick-up)
 - 3. No snow removal by the residents for sidewalks and driveways.

All of this low-maintenance work would be completed by the HOA. The Typical Proposed Age Restricted Community Bulk Standards would be:

PROPOSED AGED RESTRICTED REQUESTED STANDARDS

This proposed use would allow for Fee Simple Lots as well as Condominium (Building Footprint Area) as well as Duplex Units.

- 52' WIDE LOT – (36' WIDE – SMALLEST Building Width + 7.5' SIDEYARDS)
- 0 NO MINIMUM LOT AREA – BUILDING FOOTPRINT SIZE OR NO LOT SIZE REQUIREMENT
(If minimum lot size is required, use 6,000 sq. ft. as minimum – (52' x 116')
- 20' FRONT YARD SETBACK
Or allow this to be a 15' Front Setback that allows these standards:
 - 12' cartway
 - 2' grass strip
 - 4' sidewalk
 - 22' driveway depth to unit
- 7.5' SIDE YARD SETBACK or 15' Bldg. to Bldg. Spacing
- 25' REAR YARD SETBACK
- 0% LOT COVERAGE – BUILDING FOOTPRINT SIZE
- 3 STORIES MAXIMUM BUILDING HEIGHT
(This requirement will allow for a 3-story Townhouse Unit)

We can provide South Park Township examples of other communities that have included Age-Restricted Communities as part of a Conditional Use or PRD Option.

We look forward to attending the November 13, 2023, Public Hearing to review these comments.

Sincerely,

Michael L. Wetzel

Michael L. Wetzel
Partner

Cc: Ms. Karen Fosbaugh – via e-mail
Mr. Thomas Bonidie – via e-mail
Mr. David Scandrol – via e-mail