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March 27, 2023

Ms. Diane Hicks  
Director of Planning and Zoning  
Kennett Township  
801 Burrows Run Road  
Chadds Ford, PA 19317

**Re: Kendal at Longwood Health Center Addition  
Revised Sketch Plan**

Dear Ms. Hicks:

As requested, we have reviewed the Sketch Plan for the above-referenced project. We received the following documents electronically on February 27, 2023:

- Response letter to AECOM's February 10, 2022 review letter, prepared by RGS Associates, Inc., dated February 24, 2023.
- Sketch Plan for Kendal – Longwood – Health Center, prepared by RGS Associates, dated January 25, 2022, last revised February 24, 2023 (3 sheets).

The Plan proposes to construct a building addition to the existing health center in the Kendal at Longwood Community with associated sidewalk and parking lot improvements on UPI # 62-2-14 (133 acres). The proposed improvements are located in the RMHD – Residential Medium to High Density Zoning District. Currently, the Health Center Building houses 115 health care beds and 3 independent living apartments. The plan proposes to remove a portion of the existing building, add an addition, and renovate the remaining building. Upon completion of construction, there will be 114 health care beds and 22 independent living apartments in the building. The plan indicates that the proposed building area will be approximately 36,200 square feet. The Kendal at Longwood community is located at 1109 East Baltimore Pike (SR 0001). The site is currently serviced through public water and a community sewer system. Access to the site will continue to be provided via an existing entrance to East Baltimore Pike (SR 0001).

AECOM has reviewed this submission as a sketch plan in accordance with the Kennett Township Zoning, Subdivision and Land Development and Stormwater Management Ordinances. Comments from AECOM's February 10, 2022 review letter are noted below with any new or revised comments noted in bold, italic text. Please note that Kennett Township adopted a new Zoning Ordinance on February 6, 2023. The requirements of the 2023 Kennett Township Zoning Ordinance will be applicable to this project. The comments below should be addressed during the Preliminary Plan submission phase.

### **Zoning Ordinance**

1. The Sketch Plan states that the existing/proposed use is a retirement community. Per §240-701.A.(8), retirement communities in accordance with §240-1935 are a use permitted by right. §240-1935.G.(2) states that medical facilities, including treatment, nursing and convalescent facilities, are limited to use by residents of the retirement community. Where nursing facilities are proposed in conjunction with a retirement community, such facilities shall comply with the

applicable requirements of §240-1930 – Nursing Homes. The plan should include any necessary density calculations and note any applicable requirements provided in §240-1930 & §240-1935. [2/10/22]

**Per §240-701.A.(7) of the 2023 Zoning Ordinance, retirement communities in accordance with §240-1931 are a use permitted by right. The following related comments should be addressed:**

- a. §240-1931.A states that where a retirement community is proposed in conjunction with a congregate care campus, the regulations in this Section shall apply to the retirement community except to the extent they are in conflict with the regulations of §240-1925, in which event the regulations of §240-1925 shall supersede. §240-1925 provides the regulations for nursing homes, personal care facilities, congregate care community, and similar uses. All applicable regulations provided in these Sections should be addressed on the Preliminary Plan.**
- b. §240-1931.B states area and bulk standards, which vary from the prior applicable standards. The current standards should be utilized for any future plan submission.**
2. §240-1803 states the application of natural resource protection standards. Per the Kennett Township Woodland Classification and Forest Interior Map, dated July 2005, the site contains Class II woodlands. The Applicant should note if any steep slope, woodland or heritage tree disturbance is proposed. Per the Sketch Plan, it does not appear that existing woodlands will need to be disturbed unless significant grading is required. [2/10/22] **The layout of the proposed improvements has been revised since the previous Sketch Plan submission. The plan now proposes to disturb Class II woodlands per the Woodland Classification and Forest Interior Map. In addition, a small area of steep slopes are proposed to be disturbed. The Applicant notes that the proposed disturbances are within the permitted percentages of §240-1803. The required natural resource calculations should be provided on the Preliminary Plan.**
3. §240-2003 provides nonresidential off-street parking standards. Parking calculations have been provided on Sheet 1. The calculations should include the required number of spaces based on the number of employees and the number of units per §240-2003.D & E. The calculations should be updated to include the required employee parking. [2/10/22] **The required parking space calculations have been revised on Sheet 1. These calculations should be provided on the Preliminary Plan. The Preliminary Plan should also address the §240-2003.I requirement to have a minimum of two (2) electric vehicle charging stations in a parking lot.**
- 3A. §240-2005.F requirements for handicapped parking should be addressed. We note the sketch plan indicates handicapped parking in a lot north of the proposed addition, and no handicapped parking in the proposed lot east of the building addition.**
4. §240-2013 states the lighting requirements and design standards. Lighting shall be provided in accordance with these requirements. [2/10/22]
5. §240-2015 states the interior circulation and emergency access standards. The applicant should verify consistency with any preliminary plan submission. [2/10/22]

### Subdivision and Land Development Ordinance

1. §206-403.G requires submission of a sewage planning module. Although the cover letter states that the number of beds in the health center will be reduced by one as part of the proposed improvements, it is not clear what other use changes may be proposed as part of the 32,200 SF building addition. Any such changes, including any change in the number of employees, should be clarified and projected sewage flow impacts should be quantified. Any increase in flows should be addressed via a DEP sewage facilities planning module application mailer submission. All associated information should be provided to the Township. [2/10/22] ***The Applicant states that the sewage flows are treated by a wastewater treatment plant owned and operated by Kendal. During preliminary planning, any changes in the flows due to the proposed improvements will be quantified and confirmed to be compliant with the current flows permitted by DEP for the treatment plant.***
2. §206-518 states the parking lot standards. The plan proposes to revise a portion of the existing parking lot and add an additional parking lot. The proposed parking areas should be provided in accordance with the requirements of this section. [2/10/22] ***The layout of the proposed parking areas has been revised since the previous submission. Although no dimensions have been provided, the dimensions of the parking spaces and aiseways generally comply with the ordinance standards. All requirements of §206-518 should be addressed during the Preliminary Plan submission phase.***
3. §206-519 states the landscaping requirements. Landscaping should be provided in accordance with the ordinance requirements. [2/10/22]

### Stormwater Management Ordinance

1. §199-303 requires a "letter of adequacy" from the Conservation District and a PADEP NPDES construction activities permit for all proposed disturbances over one acre. Approval from the CCCD will be required prior to final plan approval. [2/10/22] ***The Applicant notes this item will be addressed during preliminary planning.***
2. No information has been provided regarding how stormwater runoff from the proposed improvement area will be addressed. The requirements of the Kennett Township Stormwater Management Ordinance will need to be addressed for all disturbed areas. [2/10/22] ***The Applicant notes that this item will be addressed during preliminary planning. The Applicant anticipates subsurface facilities will be provided to manage stormwater runoff.***

### General

1. The project parcel UPI #s should be provided on the cover sheet. [2/10/22] ***The UPI number has been added to the plan. This item is resolved.***

Please contact our office should you have any questions.

Sincerely,

**AECOM**



Stan Corbett  
Associate Vice President, Municipal Department

cc: Seth Beaver, Kendal Crosslands Communities  
Ryan Trees, EIT, RGS Associates  
Amy Ferris, Kennett Township  
Heather Dorsey, PE, AECOM