

Jim Majewski  
Community Development Director  
Lower Makefield Township  
1100 Edgewood Road  
Yardley, Pa. 19067

May 24, 2024

**Re: Preliminary/Final Plan for the Wright Farm Major Subdivision  
(Woodbury Road Investors) - T.M.P. 20-016-012**

Dear Mr. Majewski:

The Lower Makefield Township Environmental Advisory Council (EAC) has completed its review of the Preliminary/Final Plan for the Wright Farm Major Subdivision.

The proposed 47 detached homes on a 50.3 acre parcel of land are the maximum number allowed by ordinance. The subdivision is bordered by Yardley-Newtown Road to the south and I-295 to the east and is zoned R-1. There are no resource protected lands on the property.

The house lots will generally be a half-acre in size, though some will be up to 0.75 acres. In total, 11.4 acres of open space are proposed, most of it bordering Yardley-Newtown Road or I-295.

The following submissions were reviewed:

- Preliminary Plan for the Woodbury Grove Investors Proposed Single Family Detached Residential Development, 74 sheets (March 27, 2024)
- Transportation Impact Assessment (dated March 28, 2024)

Below are our comments on the submittals.

**1. Proposed Open Space**

The 11.4 acres of proposed open space is located on the perimeter of the site along Yardley-Newtown Road or I-295, or around a stormwater management facility on the western border. While this land technically qualifies as open space, there are locations on the site that better achieve the spirit and purpose of open space as it is defined in the ordinance:

“An area of land or of water, or a combination of land and water, within a development site designed and intended for the use or enjoyment of residents.”

To that end, we suggest the property surrounding the existing house be considered as open space. Sheet 5 shows there are many trees in the immediate vicinity, some with trunk diameters approaching 4 ft in diameter. After the existing

home is demolished, the surrounding trees could be left intact. The trees could form the foundation of a small, 1+ acre open space parcel at that location. Benches, playground equipment, etc. could be added to this a small community park.

If necessary, open spaces proposed along Yardley-Newtown Road, I-295, and on the west side of the property could be reconfigured to allow for additional building lots to compensate for the lost lots due to this park.

As currently designed the development lacks imagination or innovation (ex. it has no amenities or community gathering areas). Adding this small park would make the new neighborhood more desirable benefiting both the developer and the residents.

## **2. Violation of Type 2 Buffer Requirement**

The parcel being developed borders Yardley-Newton Road for approximately 1,700 ft. This road is classified as an arterial road in the Township's 2019 Comprehensive Master Plan Update. Therefore, a type 2 reverse frontage buffer is required per 200-73(C).

The buffer design and plant materials needed for the buffer are given in 178-82(C). Planting requirements for type 2 buffer:

<u>Plant Type</u>	<u>Plant</u>	<u>Size</u>	<u>Quantities</u>
<i>Shade Trees</i>		14 ft. min. ht.; 3 in min. caliper	50 trees/1,000 ft
<i>Evergreen</i>		6 ft. min ht.	55 trees/1,000 ft
<i>Ornamental flowering trees</i>		8 ft. min. ht.; 2.5 in min caliper	10 trees/1,000 ft
<i>Shrubs</i>		3 ft min.	150 shrubs/1,000 ft

A type 2 buffer should also be placed along the property's 1,000 ft border with I-295. We note that Torbert Farm development across I-295 from the Wright Farm is in a similar situation and proposed type 2 buffer landscaping along I-295.

Type 2 buffers should be added to the landscaping plan.

## **3. Type 1 Buffer Needed on the Border with Existing Farmland**

To the west and north of the proposed development is existing farmland. The remaining Wright Farm is the west and Farmland Preservation property to the north. Sixteen of the homes in the development will have backyards directly adjacent to the farmland.

Chapter 200-73(C) also requires a nonresidential/residential separation buffer be provided wherever a nonresidential use abuts a residential use. This is the situation on the west and north of the development. The farming activities (plowing, application of fertilizers/herbicides/pesticides, etc.) that will be occurring

directly next their backyards and approximately 80 ft from the homes make a barrier with a type 1 buffer appropriate.

#### **4. Tree Replacement Requirement**

The preliminary plan shows approximately 31 trees with a trunk diameter 10 inches or greater are going to be cut down at the site. Therefore, Section 178-85.H(4)(a) concerning replacement trees must be addressed in the application. The submitted preliminary plan does not.

#### **5. Traffic Assessment**

Traffic congestion is a concern to the EAC for a variety of reasons such as air quality. Review of the submitted traffic assessment suggests the traffic volumes at the Newtown-Yardley Road/Township Line Road intersection were underestimated in the submitted traffic assessment for the following reasons:

- The assessment's existing traffic at the intersection were based on single March 2024 traffic counts for each of the three peak traffic periods (a.m., p.m., Saturday). These counts are shown in Figure 2.

More comprehensive traffic counts were taken for the Prickett Preserve at Edgewood's December 11, 2020, *Transportation Impact Study*. These counts were taken in June 2019. Figures 3A and 3B in this study show the existing a.m. and p.m. peaks at the intersection much higher than those assumed in the Wright Farm traffic assessment. For example, the Wright Farm traffic assessment counted 4,730 vehicles traveling through the Newtown-Yardley Road/Township Line Road intersection during the p.m. peak, the Prickett Preserve counted 5,914 vehicles (25 % higher).

The applicant should provide an explanation on why a.m. and p.m. peak traffic levels at this location are significantly lower in March 2024 than in June 2019. If no explanation can be provided, the Prickett Preserve traffic count data should be used in this traffic analysis.

- Figure 3 of the *Transportation Impact Assessment* shows their estimate of the additional traffic generated from the Prickett Preserve at Edgewood development that will travel through this intersection. These volumes are significantly lower than those shown in the Prickett Preserve at Edgewood's *Transportation Impact Study* - Figure 4C [Total New Trip Assignment]. It seems reasonable to assume that the Prickett Preserve development would have more accurate estimates of the traffic they will generate than the Wright Farm development.
- Traffic generated by the proposed 78 home Torbert Farm development was not included in the traffic analysis.

The level-of-service analysis for the Newtown-Yardley Road/Township Line Road intersection should be redone with more accurate background traffic levels.

The Project Leader for this evaluation is EAC member Alan Dresser. Thank you for your attention to this matter.

Sincerely,  
LMT EAC

C: Matt Ross, BOS  
Dan McLoone, Community Development  
Isaac Kessler, Township Engineer (RVE)