



**Architects | Designers | Planners**

1218 Chestnut Street  
5th Floor  
Philadelphia, PA 19107  
267.804.7040

July 18, 2024

**Bonnie N. Flynn, PP, AICP, CFM**  
**Director of Planning & Community Development**  
**Plainsboro Township**  
**641 Plainsboro Road**  
**Plainsboro, NJ 08536**

**RE: Princeton HealthCare System, a New Jersey nonprofit corporation**  
**d/b/a Penn Medicine Princeton Health**  
**Planning Review for Consistency with Redevelopment Plan for**  
**Cancer Center & Imaging Center**

Dear Bonnie,

The following planning report was prepared on behalf of Princeton HealthCare System, a New Jersey nonprofit corporation d/b/a Penn Medicine Princeton Health ("PMPH") regarding its site plan application for the proposed Cancer Center & Imaging Center ("Project") on the PMPH Campus in Plainsboro, New Jersey ("Site").

The purpose of this report is to provide a summary relative to the Project's consistency with the *Amended Redevelopment Plan for the Princeton HealthCare System at Plainsboro Site* ("Redevelopment Plan"), adopted by the Township on March 13, 2013.

## **1.0 Summary**

By building a new Cancer Center & Imaging Center ("CCIC"), PMPH seeks to transform the delivery of community-based cancer care by offering compassionate care enhanced by the highest level of clinical and research advancements.

PMPH previously submitted and received approval for a 6-level parking structure and temporary surface parking area, and now seeks approval to construct a 4-story, 154,559-square-foot CCIC, together with certain renovations to the existing Fitness Center and various site improvements.

As elaborated further in this report, it has been determined that the Project is consistent with the Redevelopment Plan and does not seek any deviations from the same.

## **2.0 Overview**

For several years, the Township sought to redevelop the formerly named FMC Corporation site located on Route 1 between the Millstone River and Scudders Mill Road. Following the site's designation as an "Area in Need of Redevelopment," the Township adopted a redevelopment

plan in 2008, and after amending the redevelopment designation to include what is known as the “crescent” parcel (identified as HAD on Exhibit A, below), the Township adopted an amended redevelopment plan in 2013.

These redevelopment actions crystallized the Township’s vision for the site, by providing the framework for orderly, planned redevelopment to create a world class healthcare-oriented mixed-use complex. The Redevelopment Plan provides for eight (8) sub-districts, several of which are at least partially developed, including the Hospital Medical Office Complex (“HMOC”), Hospital Auxiliary District (“HAD”) and Office Residential Complex (“ORC”), as depicted on **Exhibit A** below.

**Exhibit A. Aerial Map**



Overlay of the several sub-districts derived from Figure 6: Redevelopment Area Land Use Plan of the Redevelopment Plan, on an aerial map depicting existing conditions as of March 13, 2013

The approved development of the HMOC sub-district includes the following improvements:

- 231-bed, 636,000 SF hospital;
- 48,000 SF fitness center;

- 146,870 SF of medical office space;
- Co-generation facility;
- Surface parking areas;
- Stormwater management facilities; and,
- **1,161-space, six-level free-standing parking garage (approved in 2023).**

Across Hospital Drive, the HAD sub-district includes the following improvements:

- Auxiliary surface parking area, **including its recent expansion;**
- Maintenance building; and,
- Stormwater management facilities.

Across Punia Boulevard, the ORC sub-district includes the following improvements:

- 105-unit, 98,750 SF, 3-story assisted living facility; and,
- **304-space temporary porous pavement parking area – long term (approved in 2023)**

A 324 space temporary gravel parking area was also approved for this location but is not required based on the construction schedule; therefore, it will not be built.

#### **Applicant's Proposal**

The Redevelopment Plan anticipated a future phase of development within the HMO sub-district to include a two-story addition to the existing hospital building, consisting of approximately 322,000 square feet, and a 93,000-square-foot addition to the existing Medical Office Building, for a total of 415,000 square feet, as well as structured parking.

PMHP has reviewed the medical needs of the area and determined that, to address the evolving needs of the region, there is a strong need for a separate Cancer Center including imaging services as is proposed in this application.

Following internal meetings and coordination with Township staff, PMHP determined that the development of the Project would be in two (2) phases – that is, two (2) separate site plan applications – in an effort to carefully manage construction of the CCIC and to limit interruptions to the existing operations of the overall healthcare campus.

The first site plan application for the parking garage, temporary surface parking area, and related site improvements received site plan approval from the Planning Board on August 21, 2023, as memorialized in Resolution No. P23-03. At the time of approval, the "Future Proposed Cancer Center" was located directly to the east of the Hospital Tower and was anticipated to result in 151,555 square feet of additional Gross Floor Area<sup>1</sup> on the HMO campus.

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<sup>1</sup> Based on the Plainsboro Township Land Use Ordinance and long-standing interpretation of same, "Gross Floor Area" is the square footage of a building used for zoning compliance purposes, i.e., for determining a project's floor area ratio and amount of required parking. Gross Floor Area does not include non-active areas such as mechanical/electrical/plumbing (MEP), penthouses, and similar systems portions of a building, as well as areas committed to permanent storage and enclosed parking. All other active areas of a building are included in Gross Floor Area.

This second phase site plan application is for the final design of the proposed CCIC, certain renovations to the existing Fitness Center, and supporting site improvements. The CCIC is now proposed to be located directly east of the Education Building, utilizing a portion of the footprint of the existing former Fitness Center space. The proposed addition is four (4) stories in height with a mechanical level and is comprised of 154,559 square feet of Gross Floor Area. The construction of the CCIC in this location requires the demolition of a portion of the fitness center containing 12,000 square feet of Gross Floor Area, resulting in a proposed overall net increase in Gross Floor Area of 142,559 square feet on the hospital campus.

The new location of the CCIC results in a design which provides separate unique Cancer Center and Imaging Center entries, more convenient surface parking and garage parking for the benefit of the Imaging Center as well as more convenient and less disturbance to the existing surface parking area for the benefit of the Cancer Center.

#### **Summary Findings**

After a detailed review of the Project's site plan, architectural plans, various reports, internal meetings with PMPH's other professional consultants, and coordination meetings with Township staff, we have concluded that the Project is consistent with the Redevelopment Plan.

No deviations are required. All aspects of the Project comply with the goals and objectives of the Redevelopment Plan (Section 2), plan elements (Sections 3 & 4), specific design guidelines and standards (Section 5), and other applicable provisions (Sections 6 through 12) contained in the Redevelopment Plan, as described in greater detail on the following pages.

More specifically, the Redevelopment Plan anticipated additional floor area to be constructed within the HMOC sub-district, and the Project continues further development of a "single, integrated and comprehensively designed" health care campus adapting to the needs of the community, through infill, high-quality / world-class development. The slight relocation of the CCIC building represents an improvement over what the project team previously presented to the Planning Board, including maintaining much of the existing network and circulation systems, providing for logical main entry points located closer to parking facilities – including the parking garage, maintaining the existing public park and common open space – including providing a "front door" to Punia Boulevard and the Green Corridor beyond, and preserving more of – and providing more natural sunlight to – the existing Healing Garden and courtyard area(s).

Additionally, the Project is in compliance with the Land Use & Bulk Regulations, and Design Guidelines & Standards. The Project continues to be in compliance with the overall FAR and impervious surface coverage limitations for the entire Redevelopment Area. While there will be slight modifications to the surface parking areas, additional buffering screening, and landscaping will be provided. The reduced surface parking areas in favor of the new building footprint creates opportunities for green roofs, and therefore, improved stormwater management. Further to that point, certain green building design strategies as suggested in the Redevelopment Plan have been incorporated. The Project remains compliant with parking

requirements; in coordination with Township staff over the past year, the project team has carefully managed/phased construction of parking facilities to limit interruption of services.

### **3.0 Planning Review**

#### **Section 2: Relationship to Local Objectives**

**Goal 1 | Coordinated Redevelopment** - The Redevelopment Plan, by its very nature, encourages future redevelopment of the Site. The proposed Project, which is coordinated with the existing facilities, is part of the already contemplated expansion so that it works with the existing healthcare campus. Sustainability will be addressed through a variety of measures, including Green Infrastructure elements.

**Goal 2 | Productive Land Uses** – The Redevelopment Plan anticipated the additional floor area to be constructed, and the medical office use is permitted, within the HMOC sub-district. No changes are proposed to the preserved open space. By the very nature of the CCIC, the Project also addresses the needs of the Township and the region.

**Goal 3 | Complementary Uses** - The proposed CCIC generally serves as an extension of the main hospital tower and is complementary to the other medical and residential healthcare uses within the overall campus.

**Goal 4 | Proper Circulation** - There are no changes to the main roadway network or public transportation that already exist within the overall healthcare campus. Access to the existing roadway network will be provided through the existing access driveways, with minor modifications to surface parking areas, to provide for improved drop-off areas as well as additional loading areas. Connections to existing pedestrian pathways will be provided and will be consistent with the standards in the Redevelopment Plan.

**Goal 5 | Gateway** – The proposed Project will consist of high-quality materials, complementing the existing architecture, maintaining the aesthetically-pleasing gateway into Plainsboro that presently exists.

**Goal 6 | High-Quality Development** – The proposed Project will utilize an interesting and varied architectural design and materials that are compatible with the high-quality design of the overall healthcare campus.

**Goal 7 | Environmental Sensitivity** – The proposed Project is sensitive to the environment by converting a portion of the surface parking area into a building that can provide for stormwater management, and the proposed development will comply with the maximum permitted 60% impervious coverage. There are no changes proposed to the open space and the proposed development is not located within the 100-year floodplain of the Millstone River. The project is in an already developed area - proposed improvements do not disturb any environmentally

sensitive areas. Further, the project is utilizing LEED guidelines for the most conservative, sustainable design where possible.

**Goal 8 | Passive Recreation** – The proposed Project is planned within already-developed or planned redevelopment areas as contemplated in the Redevelopment Plan. Passive recreational activities in the floodplain and wetland transition areas are provided within the existing public park located on the south side of Plainsboro Road. No changes are proposed to the existing park.

**Goal 9 | World-class Destination** - The proposed Project allows for the healthcare campus to adapt to the needs of the community, allowing it to remain as a world-class destination for the Township and the region.

**Goal 10 | Advance Planning Goals** – The proposed Project implements Smart Growth planning objectives held by various agencies by facilitating development and redevelopment within planned areas, preserving open space, and providing additional services within the overall health care campus that serve the needs of the community.

**Goal 11 | Plainsboro Road Sensitivity** – The proposed Project is planned within already-developed or planned redevelopment areas as contemplated in the Redevelopment Plan. The historic tree-lined environment of Plainsboro Road will remain and will not be impacted.

### **Section 3: Amended Redevelopment Area Land Use Plan**

**3.1 Overall Plan** - The proposed Project is in compliance with the overall FAR (0.35) and overall impervious surface coverage (55%) requirements.

**3.2 The Hospital/Medical Office Complex (HMOC)** – The proposed CCIC is situated within the overall HMOC sub-district, which is “to be developed as a single, integrated and comprehensively designed” healthcare campus and are being implemented in order to “accommodate expansion and changes” to the healthcare campus as it adapts to the needs of the community and the changing healthcare therapeutic technology.

**3.2.1 Permitted Uses in the HMOC** – “Medical offices, which may include diagnostic, treatment and medical procedure facilities for private physicians, other healthcare practitioners and their employees, whether or not having staff privileges at the hospital” are permitted principal uses in the HMOC sub-district. The proposed CCIC building is permitted.

**3.2.2 Area, yard and building requirements for the HMOC** – The proposed CCIC building complies with the bulk requirements.

### **Section 4: Redevelopment Area Circulation and Open Space Plan**

**4.1 Redevelopment Area Circulation Plan** – There is generally no impact to the overall circulation of the healthcare campus. The system of automobile, bus, truck, bicycle and pedestrian circulation is generally being maintained, with the proposed CCIC to be located on the east side

of the Education Building, between the existing P2 and P3 parking areas, each center utilizing existing driveways off Punia Boulevard with some modifications to provide specific parking and drop-off areas for each.

As further detailed in the Supplemental Submission, the proposed Cancer Center generally faces south, and therefore utilizes the existing southerly driveway off Punia Boulevard and a portion of the P2 parking area will be reconstructed to provide for a patient drop-off area and pedestrian access. Additionally, the proposed Imaging Center generally faces north, and therefore utilizes the existing northerly driveway off Punia Boulevard and a portion of the P3 parking area will be constructed to include a patient drop-off area and ambulette parking area. Finally, the P4 parking area will be reconfigured to create a landscaped island and new sidewalk to facilitate safer traffic flow at the north drop-off area and accommodate grade changes.

4.1.1 Required Primary Streets – The existing roadway network is being maintained. No new streets are required.

4.1.2 Secondary Roadways and Driveway – The secondary driveway network is being maintained, with some modifications to interior parking areas.

4.1.3 Transit – No changes to the bus routes or bus stops are proposed. From the existing bus stop, there will be walkways to each of the CCIC entries.

4.1.4 Bus Rapid Transit (BRT) Stop – No changes to the BRT Stop are proposed.

4.1.5 Bicycle and Pedestrian Connections within and outside the Redevelopment Area – The existing walkways will be maintained. Pathways to the existing walkways and proposed main entries to the CCIC are proposed for improved pedestrian circulation. Additionally, under Design of Bikeways and Walkways, the proposed pathways will be six (6) feet in width, at minimum. No new bike paths, combined bike path/walkways, or in-street bike lanes are proposed.

4.2.1 Public Park – No changes to the Public Park are proposed.

4.2.2 Private and Common Open Space – No changes are proposed to the healing gardens and educational gardens associated with the existing hospital building. Additional landscaping, including shade trees, ornamental trees, and foundation plantings are proposed at the main entries of the CCIC, on the east side between the proposed building and Punia Boulevard, and within the proposed landscaped islands. These features, in combination with the proposed CCIC that will be constructed within existing parking areas, will provide visual relief to existing impervious surfaces and will serve as appropriate and efficient use of land.

4.2.3 Common Open Space: the Green Corridor – No changes to the Green Corridor are proposed, and existing pedestrian crossing will be maintained.

4.2.4 Water Feature and Berms – No changes to the water feature and berm are proposed.

## **Section 5: Redevelopment Area Design Guidelines and Standards**

**5.1 Hospital/Medical Office Complex (HMOC)** – *Figure 16. Conceptual Site Plan for Overall Redevelopment Area* depicts the planned hospital/medical office complex. The location of the proposed CCIC allows for the bed tower to remain as “the signature building of the hospital complex” and without visual intrusion to the “concave façade facing Plainsboro Road and the Millstone River beyond.” The proposed building will utilize part of the former Fitness Center area (at the eastern end of the existing Medical Office Building), and will provide for a “front door” to Punia Boulevard, opposite the developments on the west side of Punia Boulevard and the Green Corridor.

The proposed building complies with the bulk requirements and, relative to this subsection, allows for the existing hospital tower to continue to comply with the standards related to Orientation, Massing, Horizontal Articulation, Materials, Building Loading, Bicycle Facilities to be maintained. As for Structured Parking, the approved Parking Garage is intended to accommodate the parking needs of the proposed CCIC, as contemplated by the Redevelopment Plan to occur within the HMOC sub-district to accommodate any additional development of the HMOC site beyond 10,000 square feet.

**5.2.1 Parking Ratios** – As noted in the prior site plan application, the combination of the approved Parking Garage, a portion of the approved Temporary Parking Lot, and modifications to various surface parking areas provide the required number of parking spaces, prior to, during and after construction of the same.

It is noted that compliance with the parking requirements for the CCIC do not include the existing or recently-added parking spaces in the HAD District, as required by the Redevelopment Plan.

From a practical perspective, PMPH has undertaken a parking study to evaluate the actual observed peak parking demand at the current campus as well as anticipated parking demands for the Project. The study includes a detailed parking evaluation considering the various phases of construction and utilities work associated with the Project. Ultimately, the study shows that the parking requirement(s) contained in the Redevelopment Plan is more than adequate, and that the parking currently provided, combined with the additional parking spaces to be constructed, will meet and exceed the parking needs of the Site.

**5.2.3 Surface Parking Design** – Various site improvements associated with the proposed CCIC will include some modification to the surface parking lots, for which landscaping, including shade trees, foundation plantings, and a new landscaped island are proposed, in addition to landscaping associated with the proposed building itself.

**5.3.1 Mechanical and Utilities** – As noted in the Project Narrative, the proposed CCIC is designed to have an upper “Mechanical Level” that is wrapped with a metal panel system, where air handlers provide the building with fresh air. Therefore, all roof-top mechanical equipment will be fully screened from view.

**5.3.2 Telecommunications Equipment** – No additional telecommunications equipment is proposed.

**5.4.1 Green Building Design** – This section encourages but does not necessarily mandate that progressive green design features and strategies be considered. Notwithstanding that, a comprehensive sustainability plan, incorporating Green Infrastructure elements, has been incorporated into the proposed Project, including designing the building to potentially achieve LEED Gold, strategically incorporating green roofs over each entry canopy and the LinAc Vault structure, as well as a porous pavement system with underground storage in the parking areas. It is also noted that there will be a decrease in motor vehicle surface areas of approximately 20,000 square feet.

**5.4.2 Green Lighting Design** – Any new lighting will be LED cut-off light fixtures that comply with the "Dark Sky" standards that reduce energy use and minimize glare and nighttime light pollution, consistent with existing light fixtures throughout the Site.

**5.5 Signage** – The Site presently contains a comprehensive exterior wayfinding sign network, including monument signs, vehicular directional signs and parking entry directional signs. Most of the monument signs and several vehicular directional signs will remain without any structural changes. Two (2) signs will be relocated enough to allow for the expansion of pedestrian walkways. Any revisions and new signage will include additional content as needed to enable clear wayfinding to the proposed CCIC and to the relocated Physical Therapy entrance. Signage will be consistent within the framework of the Redevelopment Plan, will be high quality, and will complement the overall design character of the redevelopment area.

**5.6 Street Design** – No new streets are proposed. Any reconstructed streets will comply with the Redevelopment Plan.

**5.7 Landscape Design** – The landscape design of permanent site improvements will comply with the Redevelopment Plan, including those provisions pertaining to building landscaping and trees.

**5.8.1 Utilities** – Utility connections associated with the proposed CCIC will comply with the Redevelopment Plan. All connections will be made to the existing utilities within the Site.

**5.8.2 Stormwater** – The stormwater management design will comply with the most recent Township Ordinance and will include various Green Infrastructure elements such as porous pavement with underground detention.

**5.8.3 Solid Waste and Recycling** – No new exterior enclosures are proposed; the solid waste and recycling will be managed through the existing hospital loading dock. Generally speaking, solid waste and recycling procedures have been operationalized since its opening.

#### **Section 6: Redevelopment Plan Phasing**

It is noted that the Redevelopment Plan anticipates redevelopment to occur in phases, with Phase 3 referring to expansion of the existing hospital building, including structured parking. The proposed Project is consistent with the anticipated phasing.

### **Section 7: Redevelopment Actions**

This section generally pertains to permitted actions that may be undertaken by the Township and generally does not provide for specific actions to be undertaken by PMPH as part of this Project. Certain linkages encouraged by the Township are either in place or are ongoing.

### **Section 8: Plan Consistency Review**

This section generally pertains to the required statements as to the Redevelopment Plan's consistency with other plans, such as those of adjacent municipalities, Middlesex County and the State, as required by the Local Redevelopment and Housing Law ("LRHL") at N.J.S.A. 40A:12A-1 et seq. There are no specific analysis or actions to be undertaken by PMPH as part of this Project. This application does not change conclusions of this Section of the Redevelopment Plan.

### **Section 9: General Provisions**

This section provides for general or specific provisions pertaining to applications for development submitted to the Township for review, as follows:

9.1 Easements – The proposed Project will not be building on any Township easements.

9.2 Site Plan and Subdivision Review – Various supplemental plans and information as required by the Redevelopment Plan are provided under separate cover.

9.3 Amended Redevelopment Plan and Existing Zoning – This subsection indicates that the zoning standards promulgated by the Redevelopment Plan supersedes the underlying zoning standards of the Township. There are no specific analyses or actions to be undertaken by PMPH as part of this Project.

9.4 Adverse Influences – The proposed CCIC is a permitted principal use and will comply with performance standards contained in the Redevelopment Plan.

9.5 Non-Discrimination Provisions – This subsection indicates that there shall be no restrictions on various protected classes. There are no specific analyses or actions to be undertaken by PMPH as part of this Project.

9.6 Duration of the Plan – This subsection indicates that the Redevelopment Plan is in effect for a period of 35 years beginning from the date of its approval. There are no specific analyses or actions to be undertaken by PMPH as part of this Project. The Redevelopment Plan remains in effect.

9.7 Deviation Requests – This subsection outlines the procedure to allow for the Planning Board to grant deviations from the regulations contained within the Redevelopment Plan. The proposed Project does not require any deviations.

9.8 Affordable Housing – Generally any nonresidential construction associated with a nonprofit hospital is exempt from the imposition of the non-residential development fee set forth in the “Statewide Non-residential Development Fee Act” at N.J.S.A. 40:55D-8.1 to 8.8.

9.9.1 Availability of Utilities – This subsection indicates that utility agencies have already indicated that they have the capacity and are willing to serve. There are no specific analyses or actions to be undertaken by PMPH as part of this Project.

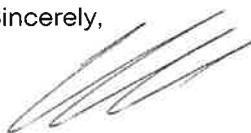
9.9.2 Sanitary Sewer System Assessment – This subsection indicates that sufficient sanitary sewer capacity exists to accept and treat additional flow resulting from the anticipated phasing in the Redevelopment Plan. PMPH will obtain Treatment Works Approval reconfirming adequate sanitary sewer capacity before constructing the CCIC.

10 Other Provisions – This section provides for a number of statements and offers guidance for the redevelopment of those portions of the Site not yet redeveloped or completed, requiring that applications are to be submitted for approval to the Planning Board. By virtue of submission of this application for development, PMPH is in compliance with this section.

11 Redevelopment Agreement(s) Required – The Applicant has previously entered into a Redevelopment Agreement.

12 Procedure for Amending the Approved Plan – This section provides for the procedure necessary in order to further amend the Redevelopment Plan. There are no specific analyses or actions to be undertaken by PMPH as part of this Project.

Sincerely,



Chris S. Cosenza, AICP, PP, LEED AP

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