



**PLANNING COMMISSION  
STAFF REPORT**

**Prepared by:** Kevin Small, AICP, RLA  
**Date:** December 30, 2025  
**Meeting Date:** January 8, 2026

**General Information**

***Applicant:*** Bel Air Marketplace, LLC

***Owner:*** Harford Mall Business Trust (c/o CBL)  
Shops at Harford Mall LLC

***Status of Applicant:*** Equitable Interest in Property Ownership

***Location:*** 600 to 696 Belair Road – Baltimore Pike/US Route 1- Business  
and Maryland Route 24 (Harford Mall)

<b><i>Lot/Building Size:</i></b>	Parcel 1946	Lot A1	25.45 acres	358,832 square feet
	Parcel 1946	Lot A2	04.43 acres	59,864 square feet
	Total Commercial		29.38 acres	418,696 square feet
	Parcel 1946	Lot A3	03.93 acres	249 multi-family units

***Requested Action:*** The Applicant requests:  
1. A Site Plan and Landscape Plan approval for the development of four buildings totaling 11,663 square feet  
2. Modification of the existing Special Development approval for the Mixed-Use Center

***Zoning:*** B-3, General Business

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**Existing Land Use:** Mixed-Use Center

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**Surrounding Land Use & Zoning:** The project area is part of the Harford Mall Redevelopment project. The adjoining Town properties are zoned B-3 (General Business) to the north, east, west and south of the site. The adjoining Harford County properties to the west, across N. Tollgate Road, are zoned B-3 (General Business). The properties to the north across Boulton Street are commercially developed and commonly referred to as the Harford Mall Annex. The properties to the east and across MD Route 24 are developed as a shopping center (Bel Air Town Center) and a small townhome residential community. The properties to the south across Baltimore Pike are developed as a shopping center (Tollgate Marketplace). The properties to the west are a mix of retail and service uses.

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**Comprehensive Plan:** The 2022 Bel Air Land Use Plan shows the project area and the surrounding land designated as *Commercial*. The land in Harford County to the west is designated as *Medium Intensity* in the current Land Use Plan.

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**Zoning History:** A Mixed-Use Center is permitted as a Special Development in the B-3 General Business district. The Harford Mall has been modified several times since its initial construction in 1972.

- Phase I – 2022, Shops at Harford Mall (removal of Sears bldg.)
- Phase II – 2024, Residences at Harford Mall (conversion of the shopping center use to a mixed-use center)
- Phase III – 2025, Harford Mall commercial

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**Applicable Regulations:** Applicable sections of Chapter 165 Development Regulations:

- Article III (Sect. 165-32. B-3 District);

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- Article VII (Sect. 165-51. Parking and Loading & Sect. 165-53 Performance Standards and Development Guidelines);
- Article VIII Landscaping Standards (Sect. 165-54 through Section 165-61);
- Article XI Permits and Procedures (Sect. 165-82 Building Permit);
- Article XII Appeals; Variances; Special Exceptions; Special Developments (Sect. 165-94 Special Developments);
- Article XVI Subdivision and Site Development (Sect. 165-117 through 165-118);
- Permitted Use Tables, Table 3-6 & 3-7, Commercial Uses; and,
- Lot Requirement Tables, Table 165-32, B-3 General Business

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**Public Utilities & Services:** Public utilities are currently provided to site. Bel Air Volunteer Fire Company and Bel Air Police Department provide fire, EMS and police protection.

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**Transportation:** The Harford County Transit Link runs the Bel Air Circulator (Orange Line), which has a stop at the Harford Mall near the northeast corner of the existing mall. This stop is also a transfer stop for the Blue Line and Green Line. Tollgate Road is classified as a Major Collector on the Harford County Road Classification Map. Boulton Street is a Town street and an Urban Collector. MD Route 24 is an Expressway. Belair Road (U.S. Rte. 1 Business or Baltimore Pike) is a Principal Urban Arterial. There are two existing signalized entrances to the site along Boulton Street. One opposite the Mall Annex and one opposite the intersection with Gateway Drive.

Approval for Phase II proposes to eliminate the eastern most entrance along Boulton Street and relocate an unsignalized access closer to MD Route 24 providing right-in/right-out/left-in access. The development site also has right-in/right-out access to Baltimore Pike.

The applicant submitted a Traffic Impact Analysis (TIA) for this development as part of Phase III and comments from the Town were issued on November 20, 2025. Harford County and the State have comments attached to this letter that must be addressed.

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***Environmental  
Assessment/Physical  
Characteristics:***

There are no mapped environmentally sensitive areas in proximity to the proposed development. The site has been developed for many years. The site is gently sloping down from the center of the Harford Mall toward each outer boundary line. There is no forest on the site. The perimeter of the site has some street trees, and some of the access aisles have trees and shrubs. There are few, if any, landscape islands within the parking area.

The site was developed in the 1970's, prior to enactment of the first Bel Air Storm Water Management guidelines in 1984. SWM "redevelopment" requirements apply.

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***Landscaping, Lighting  
& Amenities:***

The plan has proposed replacement site lighting. Landscaping is required in accordance with Article VIII and the applicant has submitted a landscape plan for the proposed development. Open Space for the project is satisfied through a payment for a fee-in-lieu of \$176,500 as required by the previous development approval. No Public Amenity is required for this phase beyond the phase III conditions of approval.

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***Performance Standards:***

The general performance standards in Section 165-53.B apply. Other specific performance standards also apply:  
Mixed-Use Center – Section 165-53.I(2)(g)  
Service Use – Section 165-53.I(1)  
Retail Use – Section 165-53.H(1)  
Restaurant – Section 165-53.I(2)(l)

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**Architectural Review:** Architectural elevations and renderings in color of all sides of the proposed buildings have been submitted for review. A copy of the Town architectural consultant comments is attached.

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**Analysis:**

The Applicant is requesting Site Plan and Landscape Plan approval to construct two (2) buildings totaling 11,663 square feet of commercial space within the project area of the Harford Mall. This will be the fourth Phase of re-development for the mall which revises phase II and phase III previously approved by the Town. Final Site and Landscape Plans have been submitted and approved by the Town, so this phase is considered apart from the previous phases and supersedes the improvements shown on those plans where applicable. This submission is an alteration to the existing Mixed-Use Center and requires modification of the existing Special Development approval.

The proposed project is reviewed in aggregate so all parcels and buildings within the Harford Mall project area and must meet the criteria for a Mixed-Use Center. The performance standards for Mixed-Use Centers are attached to the application along with criteria for applicable new uses. The first three Phases are approved and are not subject to any amendment or revision by the Planning Commission.

**OVERALL SITE**

The existing Harford Mall project area as described above encompasses several buildings including the Shops at Harford Mall near Tollgate Road, the former Macy’s furniture store and the Mall itself. The current building area of the Harford Mall is 496,337 square feet of commercial space. Phase II of development will add 249 multi-family dwelling units. Phase III development proposes demolition of the Macy’s building/mall (172,228 sf) and adds 82,924 square feet of new development resulting in 407,033 commercial square feet.

The proposed Phase IV development of two (2) buildings adds the following:

- |                                    |                            |
|------------------------------------|----------------------------|
| • Building 400 (restaurant/retail) | 5,256 square feet          |
| • Building 500 (restaurant/retail) | 6,407 square feet          |
| Subtotal                           | 11,663 square feet         |
| <b>Total</b>                       | <b>418,696 square feet</b> |

Town code requires that a minimum of fifty (50) percent of the total development area must be commercial space (based on the Comprehensive Plan designation). The space utilized by the previously approved multi-family use is 264,120 square feet. When interior mall corridor spaces are removed (39,485 sf), the proposed development will result in 379,211 square feet of commercial space which provides for a minimum of 59 percent commercial space. Interior mall corridor space is also removed from the total commercial space required for parking resulting in the following:

- Commercial space remaining after Phase II & III 407,033 square feet
- Corridor space remaining in mall subtracted (39,485 square feet)
- Additional commercial space added as part of phase IV 11,663 square feet
- Space applied to parking calculation @ 3.5sp/1000sf **379,211 square feet**

Parking is located throughout the project area which must total a minimum of 3.5 parking spaces per 1000 square feet for the commercial area equaling 1,327 spaces required for 379,211 square feet. 1,368 parking spaces are provided which exceeds the code requirement by 41 spaces. The Phase II (residential) approval required the abandonment of 34,307 square feet of commercial space within the mall to meet the minimum parking requirement. More than this amount of space is proposed for removal as part of Phase III rendering this requirement unnecessary. However, this condition must remain in effect until the demolition of Macy's construction of the Phase III occurs. Handicapped spaces meet ADA requirements, however, the spaces shown within Phase IV do not have any van accessible spaces. The applicant is encouraged to address this at the hearing.

### SITE

The applicant appears to have addressed internal pedestrian connections required by the special development criteria by adjusting the proposed internal parking lot sidewalks shown on the east/west link from building 600 to 300. One minor adjustment is recommended to improve pedestrian connectivity as shown on Exhibit A by adjusting handicapped striped area to coordinate with a more direct pathway from building 600 to 500.

The configuration of the service area was a concern to staff given its overwhelming size and awkward design. However, the placement of numerous refuse/recycling for several buildings within the development will require more room for maneuverability that is provided by the proposed layout. However, additional screening is needed to visually separate the service area from the public portion of the development. Staff is recommending 6'-0" screen walls matching others in material and design flank the access to provide the needed barrier for the service area.

Since buildings 500 and 600 must use the refuse/recycling bins located within the service are, pedestrian access is recommended as shown on Exhibit A.

The submitted Site Plan shows exterior patios adjacent to each proposed commercial building. However, more detail is needed if the applicant intends to acquire special development approvals for outdoor dining in the future. No Outdoor Dining & Bar service uses are considered part of the current request.

### PREVIOUS APPROVALS

#### Shops at Harford Mall – 05P-21-01-SP/SD/SB (Phase I)

- Architectural Performance Agreement (September 5, 2023) – Bond for possible architectural improvements to the southwest façade of the Harford Mall. This document has been renewed for an additional three (3) years and will expire September 5, 2028.
- Off-site intersection improvements at Gateway & Boulton and at North Tollgate & Baltimore Pike have been completed, inspected and approved.

#### Residences at Harford Mall – 11P-23-03-SP/SD/SB (Phase II)

- A Final Site Plan and Final Landscape Plan have been approved. Revised architectural exhibits are required prior to submission for building permit.
- Substantial construction must be initiated prior to January 4, 2027, in order to vest the approved plans. No extension of approvals is available.
- Off-site road improvements along Boulton Street between Tollgate & MD Route 24 and intersection upgrades at Tollgate/Baltimore Pike are required prior to Final Use & Occupancy permit.

#### Commercial at Harford Mall – 06P-25-01-SP/LP/SD/SB (Phase III)

- A Final Site Plan and Final Landscape Plan have been approved. Revised architectural exhibits are required prior to submission for building permit.
- Substantial construction must be initiated prior to July 17, 2027, unless extended by the Planning Commission.
- Off-site road improvements must be completed prior to Use & Occupancy permit.

### LANDSCAPE

The applicant has submitted a Landscape Plan for review and comments are graphically provided on Exhibit A including addition of interior shrubs and street trees along with trees along the access drive and within the parking area. The proposed landscape is consistent with the design of the overall center. Final Landscape Plan should include all proposed area lighting.

### FOREST CONSERVATION

A Declaration of Intent regarding existing forest and potential clearing for the entire development was previously provided to the Town and approved.

### ARCHITECTURE

The applicant has provided color elevations and renderings of the architecture for the proposed buildings. Comments from the Town architectural consultant are attached. The proposed buildings appear to be consistent with the Phase III renderings, however, a few of the descriptors do not match. The proposed Phase IV indicates smooth stucco in places where the previous phase describes EIFS, the current submission proposes decorative block where the previous phase smooth face architectural block. These inconsistencies must be addressed by the applicant at the hearing. The center must be in harmony in material, design, color and massing. Be advised that as users are identified for each building, any significant change in site design or architecture will require a new review by the Planning Commission.

A comprehensive signage plan is attached to the review package. This proposal appears to be in harmony with the architecture and within the limits of the code. It is suggested the applicant consider coordinating with the Town to identify interior drive aisles so patrons can easily navigate the development and emergency services can respond without possible confusion. In addition, staff questions the use of 'Derby Place' as an identifier.

### TRAFFIC

The review of anticipated traffic impact from this development is ongoing in coordination with the County and the State. The required study was submitted as part of Phase III and comments from the Town were provided to the applicant for review. The Business US 1 & MD 22 Multi-Modal Corridor Study commissioned by the Town and County will also be consulted as part of any review for this development.

### MIXED-USE

Mixed-Use Centers are a special development and must meet performance standards as outlined in Section 165-53.I(2)(g). The architecture must be in harmony with the rest of the development and with the neighborhood as much as is practicable. Internal vehicular and pedestrian traffic must be designed to minimize conflicts and to mitigate potential impact to patrons or residents. Security, loading, unloading, and recycling/refuse must be organized between owners and

coordinated with the Town. A Development Agreement was executed between the property owners as part of the Phase II (residential) approval. All previous conditions of approval for Phase I, II and III still apply.

### MASTER PLAN

The Town code does not require a master plan be submitted showing anticipated future development. However, the applicant has taken comments from the Planning Commission and provided a sketch showing anticipated development in future phases. This concept is illustrative in nature and does not obligate the applicant to any future design. A pedestrian connection concept plan is also provided for review.

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### **Recommendations:**

#### Comprehensive Plan

The proposed use meets the provisions of the 2022 Comprehensive Plan as required by Town Code Section 165-19.

#### Site Plan

At a minimum, approval of the preliminary Site Plan is conditioned on the following:

1. Prior to Building Permit Application, submission of a Final Site Plan for signature incorporating comments from this staff report, and comments from:
  - a. Bel Air Volunteer Fire Company pending
  - b. Harford County Health Department pending
  - c. Harford County Soil Conservation District pending
  - d. Bel Air Public Works comments dated December 18, 2025
  - e. Town Architectural consultant comments dated December 30, 2025
2. Prior to approval of utility construction drawings, applicant must address comments from Maryland American Water Company.
3. Prior to signature of Final Site Plan, revision of the Site Plan based on Exhibit A dated December 30, 2025.
4. Complete all site work on the Final Site Plan prior to issuance of the final Use and Occupancy permit:
  - a. Construction of required improvements outlined in the Town Traffic Impact Analysis conditional approval letter dated November 20, 2025

- b. Landscape installation.
5. Coordination of utility placement, easements and rights-of-way with the Department of Public Works prior to building permit issuance.

### Landscape Plan

At a minimum, approval of the Landscape Plan is conditioned on the following:

1. Prior to Building Permit issuance, submission and approval of the Final Landscape Plan incorporating comments from this staff report and the following:
  - a. Adjustment of street trees, revision to interior parking lot planting and drive access based on Exhibit A dated December 30, 2025, prior to signature of Final Landscape Plan.
  - b. Addition of proposed area lighting.

### Special Development for the Mixed-Use Center

The Special Development for Mixed-Use Center is based upon the following findings of fact that the applicant has adequately demonstrated adherence to Section 165-53.I(2)(g):

- [a] The applicant has provided a unified arrangement of buildings, service areas, parking, signage and landscaping.
- [b] The architecture, site design, lighting and signage incorporate consistent design and theme elements and materials, massing and facade design for the project that is in harmony with the character of the neighborhood.
- [c] The internal circulation system is be designed to minimize through traffic and traffic conflicts within the project.
- [d] Safe pedestrian movement and the provision of pedestrian walks within the parking lot and surrounding the building perimeter is considered in the design.
- [e] All proposed establishments have vehicular service access either from an individual service drive, space or from a common service yard. All loading, trash removal, compaction or similar activities are segregated from public areas and screened from public view.
- [f] Signs to identify the use of an occupant will be designed as part of the architectural design of the building. Proposed signage is conditioned for approval of the preliminary plan and is subject to review and approval by the Planning Commission.
- [g] Directional and informational signs will be adequately provided, and design coordinated.

- [h] Center management is responsible for providing on-site security service.
- [i] A traffic and/or parking study was submitted and is under review.
- [j] The owners of all lots have executed and recorded a Development Agreement with the Town providing that all owners acknowledge and agree to be bound by performance standards as an overall scheme of development, outlining all shared elements, granting reciprocal easements to permit each owner to access any other owner's lot or parcel of land for the purposes of compliance with the Town Code and for either remediating any zoning violation or to comply with the Town Code for the purposes of any approvals sought by any of the owners of the lot and agreeing that the Town shall permit enforcement of any portion of the Town Code upon one or more owners of any lot or parcel of land contained within the Mixed Use Center scheme of development.



Kevin L. Small, AICP, RLA  
Director of Planning & Community Development

**Attachments:** Application with description, annotated performance standards  
Agency Comments  
Site Plan (exhibit 1)  
Overall Site Plan – Mixed-Use Center (exhibit 2)  
Landscape Plan (exhibit 3)  
Architectural Elevations & Renderings (exhibit 4)  
Master Plan (exhibit 5)  
Pedestrian Plan (exhibit 6)  
Signage Plan (exhibit 7)  
Auto Turn graphic (exhibit 8 & 8A)  
Exhibit A – recommended changes to Site & Landscape Plan



# TOWN OF BEL AIR

## DEPARTMENTS OF PLANNING AND PUBLIC WORKS

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## MEMORANDUM

To: Kevin Small, Director of Planning

From: Buddy Haight, Associate Engineer

Date: December 18, 2025

Subject: Site Plan Review – Harford Mall Redevelopment phase 4

A review has been made of the Plan SP provided by Fredrick Ward Associates, dated 12/11/2025 for the above referenced project. The following comments are provided as a guide for revisions:

No Comment

Should you have any questions regarding these comments, please feel free to contact me.

Cc: DPW file

# Paul D. Edmeades

ARCHITECT / PLANNER  
AIA



Town of Bel Air  
Department of Planning  
Mr. Kevin I. Small, Director  
705 E. Churchville Road  
Bel Air, Maryland 21014

December 30, 2025

RE: Design Review  
Harford Mall – Mixed Use Lifestyle Center  
600 Belair Road / Baltimore Pike

Dear Mr. Small:

The following is a response to your request to review the design aspects of the submittal for the proposed development of Phase 4 of a mixed use lifestyle center at the existing Harford Mall site. The overall proposal is to build a new mixed use center at the east side of the current mall site which is currently occupied by the former Macy's Department Store. I received a site plan and design drawings for the proposed design. The documents I received are as follows:

1. Site Plan Harford Mall Redevelopment Phase 4: Sheet SP 1 of 1 prepared by Frederick Ward Associates and dated December 11, 2025.
2. Harford Mall Master Plan prepared by SJC Ventures and dated June 26, 2025
3. Site Plan: Pedestrian Circulation Phase III and IV undated
4. Elevations of Building 400 prepared by Maryland Architect David Yung and undated.
5. Elevations of Building 500 prepared by Maryland Architect David Yung and undated
6. Packet of information titled Harford Mall Redevelopment containing the following: Site Plans, Access and Connectivity Plans, Greenspace Plans, Screening Information, Building Materials Information, and small scale versions of the Elevations for Building 400 and Building 500 Undated

The proposed design involves the construction of Building 400 and Building 500 in Phase IV of the one-story mixed use lifestyle center. The two buildings total 11,663 SF. The project will aid in the redevelopment of the existing shopping center into a mixed use center. The new buildings are effectively articulated with complementary materials. The varying mass articulation highlights areas of the building to create a harmonious composition. The new buildings will create a lively part of the multipurpose center development that will complement the existing facility. Please note that this analysis is based on the Planning Commission's prior approval of the Phase 1 and Phase 3 development sections.

The proposed project is located in a B3 General Business District and must comply with the Bel Air Development Regulations as follows:

1. Article III §165-32 B-3 General Business District: See item by item analysis below.
2. Article VII Performance Standards
  - a. §165-53 A & B General Performance Standards. See item by item analysis below
  - b. §165-53 H (1) Retail Use Performance Standards. See Item by item analysis below.
  - c. §165-53 H (2) (d) Shopping Center Performance Standards. See item by item analysis below
3. Article XVI §165-118E Landscape and Amenity Design. Comments on this article are not a part of this visual architectural analysis.
4. Article VIII Landscaping. Comments on this article are not a part of this visual architectural analysis.
5. Article XI Permits. Comments on this article are not a part of this visual architectural analysis.
6. Article XV Signs. Comments on this article are not a part of this visual architectural analysis.
7. Article XVI Subdivision and Site Development. Comments on this article are not a part of this visual architectural analysis.

Article III §165-32 B3 General Business District.

#### A. Purpose

1 The proposed development is Phase IV of a mixed use development which will complement the existing commercial uses and will further improve the mixed use development at Harford Mall in accordance with the Town of Bel Air Comprehensive Plan.

2. The development is located on Boulton Street at the intersection with Maryland Route 24. It is a part of the Harford Mall development which is located on major transportation corridors to downtown Bel Air. The new development is designed to further transform the Harford Mall Complex into a Mixed Use Development

#### B. General Regulations

1. Special Regulations There are no home occupations in the development
2. The development with its fine grained massing and curb appeal will enhance the visual approach to the Town
3. Comments on street trees is not a part of this visual architectural analysis
4. Comments on any sign plan are not a part of this visual review.

### C. Site Design Standards

(1) Comments on the access permit are not a part of this visual Review.

(2) The proposed architecture will complement and improve the existing environment. It will establish a new attractive development along Boulton Street. The buildings appear to ensure visual privacy and sunlight for adjacent structures.

(3) There are no special street views from these proposed buildings. The proposed buildings will employ numerous massing and façade variations which are appropriate.

#### (4) Building Design, Height, and Massing

(a) The building will continue an aesthetic that will complement the existing architecture in the area. Architecturally harmonious materials, texture, and treatment is used for all exterior walls.

(b) The rear façades and all façades of both buildings are of finished quality.

(c) The style of the buildings is appropriate for the site. They will improve the aesthetic design of the area which has been dominated by the existing mall buildings for many years. They create a refined design that will take their place in the design vocabulary of the area with its scale and detailing.

(d) The buildings are effectively articulated with many building offsets and recessed areas. The building façades are modulated and meet the 40 foot requirement.

(e) The flat roof forms are compatible with the predominant flat roofs of the adjacent structures.

(f) The nature of the glass is not indicated on the submission. The architect should verify that the glass is not reflecting or mirrored. If the glass is tinted, the Zoning Administrator will need to review the glazing.

(g) The building is effectively articulated. The buildings are designed to provide contrasting colors to highlight the various elements of the architectural composition. The articulation is both horizontal and vertical to effectively highlight the various aspects of the building.

(h) The adjacent residential zoned district is across Route 24 from the proposed buildings and, therefore, stepdown requirements for the building are not necessary.

#### (5) Fencing and Screening

(a) A decorative fence and screen wall are indicated to screen the buildings. The design of the screen wall and decorative fence are appropriate.

(b) In reference to the service areas, it appears the dumpster areas are appropriate for Building 400, but attention needs to be given to the servicing of Building 500.

(c) Rooftop mechanical equipment appears to be screened

#### (6) Lighting and Security

(a) Decorative lighting: Decorative lighting is not a part of this visual review.

(b) Parking Lot Lighting: Parking lot lighting is not a part of this visual review.

(c) Security Alarms: Security alarms are not a part of this visual review.

(7) Vehicular and Pedestrian Access: Vehicular and pedestrian access are not a part of this visual review

D. Special Regulations: Refer to Article VII § 165-53 Performance Standards (See item by item analysis below)

E. Analysis of density, lot area, width, height, and yard requirements are not a part of this visual review.

#### Article VII §165-53. Performance Standards

A.Purpose: The proposed development will comply with the requirements regarding the purpose of the Performance Standards

#### B. General Performance Standards

##### (1) Performance Standards for all Districts

- (a) Pedestrian sidewalks are not a part of the visual review
- (b) Applicant confirmation of code conformance is not a part of the visual review
- (c) The size of the site is not a part of the visual review
- (d) Protection of pedestrian areas is not a part of the visual review
- (e) The walkway system is not a part of the visual review
- (f) Demonstration that the proposed use will be safe and not create a nuisance is not a part of this visual review
- (g) Identification of noise generating uses is not a part of this visual review
- (h) Vehicular access to the site is not a part of this visual review
- (i) The proposed project does not adjoin a historic structure.
- (j) The buildings are architecturally compatible and complement the proposed development. The proposed buildings will fit into a unified mixed use development to replace the existing Harford Mall. The two buildings will be an integral component of the revised complex. The buildings are acceptable in quality, texture, finish, size, shape, style, rooflines, and materials
- (k) Rooftop mechanical equipment appears to be screened.
- (l) With reference to fences and screen walls refer to the comments above.
- (m) Noise compliance with the regulations is not a part of this visual review
- (n) Comments on landscaped areas are not a part of this visual review.
- (o) Comments on use setbacks and separations are not a part of this visual review.

##### (2) Guidelines

- (a) Green building elements are not a part of this visual review
- (b) The proposed buildings will complement the proposed development of the Harford Mall site. They will further an aesthetic which will bring new life to the existing site. The shape, style, color, and materials are appropriate for the proposed new buildings and will complement the overall development.

Article VII §165-53

H. Performance Standards for Retail Uses

(1) Performance Standards

- (a) The location of the buildings is suitable for the type and scope of development proposed. They will be part of the redevelopment of the Harford Mall Site.
- (b) The proposed development is across Route 24 from a residential zone. The area along route 24 requires a 22 foot setback which complies with the required buffer of 10 feet.
- (c) Comments on amenities are not a part of this visual architectural review.
- (d) Identification of accessory uses is not a part of this architectural review.
- (e) The service areas in the complex appear to be screened from public view.
- (f) The development is within 500 feet of a residential district, but that district is across Route 24 from the project. Route 24 should provide adequate isolation from refrigerator trucks.

Article VII §165-53

H. Performance Standards for Retail Uses

(2.d) Shopping Center Performance Standards

- (a) The two buildings will be a part of a unified arrangement of buildings, parking, and landscaped areas.
- (b) The architecture and site design will incorporate consistent design elements. Comments of lighting and signage are not part of this visual review.
- (c) The materials, massing, and façade design of the two buildings will be a part of the development that replaces the huge mass of the existing Harford Mall. They will provide a contrast to the huge mass of the existing Harford Mall Complex building and complement the design elements in Phase1, Phase 2, and Phase 3 of this development.
- (d) Comments regarding internal traffic circulation systems are not a part of this visual review.
- (e) Comments regarding safe pedestrian movement are not a part of this visual review.
- (f) All establishments in the complex have vehicular service access from individual service areas or common service yards.
- (g) Attention must be given to the service area for Building 500. As proposed this building is not adequately served by a service and dumpster area.
- (h) Comments on the Development Agreements are not a part of this visual review.
- (i) The proposed development is across Route 24 from a residential district. Route 24 provides an effective separation and therefore no buffer yards are required.
- (j) Comments on signage are not a part of this visual review.
- (k) Comments on directional and informational signs are not a part of this visual review
- (l) Comments on security service are not a part of this visual review
- (m)A traffic study is not a part of this visual review
- (n) Comments on vehicular access to the site are not a part of this visual review

Mr. K. Small  
December 30, 2025  
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Article XII §165-94

C. Special Development Conditions for Approval

Comments regarding the Special Development Conditions of Approval are the purview of the Planning Commission and are not a part of this visual review.

Based on my analysis, I feel that the proposed Phase 4 of the Harford Mall Redevelopment complies with the Town of Bel Air Development Regulations. The Planning Commission should verify the issues that are raised in this analysis as a part of their review.

Please note that these comments concern only the visual aspects of the design proposal submitted. Other requirements of the development regulations are not a part of this review. All building code analyses, life safety code analyses, other code analyses, and constructability analyses are specifically excluded from this visual review. In addition this review does not include structural, mechanical, electrical, plumbing or other engineering services.

If you have any questions please call me.

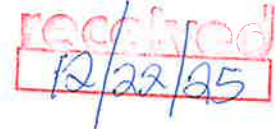
Sincerely,



Paul D. Edmeades, RA, AIA, NCARB

December 22, 2025

Mr. Kevin Small  
Department of Planning and Community Development  
705 E. Churchville Rd  
Bel Air, Maryland 21014



Dear Mr. Small:

Thank you for the opportunity to review the Site Plan for the Harford Mall Phase 4 redevelopment located on US 1 in Bel Air, Harford County. The Maryland Department of Transportation, State Highway Administration (MDOT SHA) has completed their review of the plan submittal below and is pleased to respond.

**Harford Mall Phase 4 Redevelopment**  
**600 Belair Rd, US 1**  
**Case Number: 01P-26-02-SP/SD/SB**  
**Harford County**

The MDOT-SHA has reviewed the Site Plan for the proposed Harford Mall Phase 4 Redevelopment, and we have the follow comment:

1. SHA will require a Traffic Impact Study for review to determine potential impacts to the SHA roadway network. We request that the Town of Bel Air not issue any permits for this site until the SHA has approved the TIS and all SHA off-site improvements required have been completed to the satisfaction of SHA.

Should you have any questions please contact Ms. Teresa Eller at 410-229-2424 or 1-866-998-0367 (in Maryland only) extension 2424, or by email at ([teller@mdot.maryland.gov](mailto:teller@mdot.maryland.gov)).

Sincerely,

*Teresa Eller for,*

Claudine Myers  
Metropolitan District Engineer  
State Highway Administration - District 4  
Baltimore and Harford Counties

