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SCOTT FRANCE, AICP
EXECUTIVE DIRECTOR

April 22, 2025

Mr. Christopher Leswing, Director of Building & Planning
Building & Planning Department
Township of Lower Merion
75 East Lancaster Avenue
Ardmore, PA 19003

Re: MCPC #24-0256-002
Plan Name: 55 Ardmore Avenue
(48 du/1 lot on approximately 0.9 acres)
Situate: Ardmore Avenue (E); north of School Lane
Lower Merion Township

Dear Mr. Leswing:

We have reviewed the above-referenced land development plan in accordance with Section 502 of Act 247, "The Pennsylvania Municipalities Planning Code," as you requested on March 17, 2025. We forward this letter as a report of our review.

BACKGROUND

The applicant, HumanGood, proposes to construct a four-story multifamily building containing 48 units on the site of an existing township parking lot. The proposed building will share vehicular access from Ardmore Avenue (which is a PennDOT road) with an existing multifamily building located between the proposed building and Ardmore Avenue. Additional improvements shown at this time include 34 surface parking spaces, internal pedestrian pathways, landscaping areas, site lighting, and an underground stormwater infiltration basin. In addition, seven surface parking spaces are proposed near Ardmore Avenue that would be for township permit parking. The property is located in the township's MDR2 – Medium-Density Residential 2 zoning district. This proposal was previously reviewed in a review letter dated December 2, 2024.

COMPREHENSIVE PLAN COMPLIANCE

This property is identified primarily as Town Center in the Future Land Use Plan of the Montgomery County Comprehensive Plan, *Montco 2040: A Shared Vision*. Town Centers are traditional downtown areas with a mix of retail, institutional, office, and residential uses. Primary uses include high-density residential development next to traditional downtown areas. The proposed development specifically advances the goal to "support housing choices and opportunities to meet the needs of all people."

The Land Use Element of the 2016 Lower Merion Township Comprehensive Plan identifies this property as Public Land in the Future Land Use Map. In addition, the Lower Merion Township Comprehensive Plan identifies the Ardmore area as a Traditional Main Street commercial area typology. Traditional Main Streets are pedestrian-oriented, fine-grained, and include shared parking facilities, centralized municipal parking, and unique public gathering spaces. Apartments as stand-alone structures are considered appropriate when located on side streets.

RECOMMENDATION

The Montgomery County Planning Commission (MCPC) generally supports the applicant's proposal and we commend the township for working to advance ways to expand affordable housing in the township. In particular, the proposed development appears to be a logical expansion of the existing Ardmore House development. However, in the course of our review we have identified the following issues that the applicant and Lower Merion Township may wish to consider prior to moving forward. Our review comments are as follows:

REVIEW COMMENTS

ZONING ORDINANCE COMMENTS

Based on the information provided, we have identified the following items related to the Lower Merion Township Zoning Ordinance that we feel should be addressed as part of any future land development submissions associated with this proposal:

A. Tree Replacement. Section 155-7.5.C. contains standards for tree replacement when more than 25% of the existing viable trees having a caliper of six inches or greater are removed. The Landscape Compliance Chart on Sheet 10 indicates that no replacement trees are proposed. Alternatively, the applicant proposes to plant the required replacement trees at a different location, as described in §155-7.5.C.(8).

B. Maximum Driveway Width. Section 155-8.5.C.(1)(a) states that driveways in the MDR2 zoning district are limited to 12 feet in width. The shared driveway from Ardmore Avenue is wider than 12 feet; however, this appears to be an existing condition.

C. Bicycle Parking. Table 8.7.1. lists the minimum bicycle parking requirements based on the proposed land use. Multifamily residential developments with more than 20 units require 0.5 short-term and 0.5 long-term bicycle parking spaces per unit, therefore 24 short-term and 24 long-term bicycle parking spaces are required. A note on Sheet 1 states that the applicant proposes to provide 8 short-term and 6 long-term bicycle parking spaces.

SUBDIVISION AND LAND DEVELOPMENT ORDINANCE COMMENTS

Based on the information provided, we have identified the following items related to the township's subdivision and land development ordinance that we feel should be addressed as part of any future land development submissions associated with this proposal:

A. Sidewalk across Driveways. Section 135-4.9.F.(2)(a) requires that "the grade and paving of the sidewalk shall be continuous across driveways." The sidewalk along Ardmore Avenue does not extend across the driveway; however, this appears to be an existing condition.

B. Parking Layout. We have identified the following comments related to parking layout:

- Section 135-4.9.Q.(2)(b) requires that "parking spaces designed for the exclusive use by disabled persons shall be installed in all parking lots as close and convenient to building entrances as is reasonable." Four of the six proposed handicapped parking spaces are shown across the driveway from the building entrance. The applicant may wish to explore if some of these handicapped parking spaces could be relocated closer to the building entrance.
- Section 135-4.9.Q.(3)(a) requires that "parking shall not be permitted along driveways which serve as the entrance(s) or exit(s) to parking areas with a capacity of 50 vehicles or more. A minimum driveway length of 50 feet shall be provided between the road ultimate right-of-way line and the first parking space or internal driveway intersection in parking lots with 50 vehicles or more." The shared driveway serves as the entrance/exit to a parking area with more than 50 parking spaces and parking along the driveway appears to be located closer than 50 feet from the right-of-way of Ardmore Avenue.
- Section 135-4.9.Q.(3)(c) requires that "up to 30 parking spaces may only be located in a dead-ended parking area, only if a suitable turnaround area is provided at the closed end."
- Section 135-5.3.F.(3)(b) requires that "all parking rows must be terminated by a planting island." The section of four proposed parking spaces on the northeast frontage of the proposed building is not terminated by a planting island.
- Section 135-5.3.D.(1) requires a 10-foot wide perimeter landscape buffer "for vehicular use areas of any size which are located in the side or rear setback of a property, or otherwise abut an adjacent property where no right-of-way intervenes." However, since access is proposed to be shared with the adjacent Ardmore House property, §135-5.3.D.(2) may apply.

C. Electric Vehicle Charging Stations. Section 135-4.9.R. contains requirements related to electric vehicle charging stations. Future submissions should demonstrate compliance with this section.

D. Landscape Plan. We have identified the following items related to the applicant's proposed landscape plan, as it relates to the township's subdivision and land development ordinance.

- Standards for landscaped buffers, including where they are required and minimum planting requirements for different types of buffers are located in §135-5.2. Specifically, we noted:
  - A softening buffer is required where residential use is proposed adjacent to multifamily. The landscape compliance chart indicates that the applicant proposes to use Option 2 for the softening buffer. Note #1 for Table 5.2.2. states that "the softening buffer Option 2 can be utilized when large canopy trees greater than 24 inches are proposed to be preserved within the 100 linear feet. In all other cases, softening buffer Option 1 should be installed." Therefore, it appears that Option 2 is not applicable to this portion of the site and the applicant should show compliance with softening buffer Option 1 or the Limited Area Buffer.
  - It appears that additional buffers may be required that are not taken into account in the landscape compliance chart. For example, Table 5.2.1. requires a filtering buffer where residential use is proposed adjacent to commercial. A portion of the parking lot abuts a commercial property zoned Village Commercial.

    - A screening buffer planting is required to screen certain site elements such as electrical transformers and generators from off-site. Some landscaping and a screening wall appears to be shown around portions of these site elements; however, it is unclear if the proposed landscaping complies with the screening buffer requirements.
    - Note #3 in Table 4.2.2. MDR2 Dimensional Standards of the township's zoning ordinance states that "where a lot abuts a property zoned LDR or MDR1 at the side or the rear, the lot shall include a buffer of 20 feet in width." The southernmost parking space along the southeastern property line appears to encroach into this buffer. Parking within zoning-established buffer areas is prohibited by §135-5.2.D.(5) of the township's subdivision and land development ordinance.
- Planting islands within the parking lot are required to be at least 340 square feet. Several of the proposed planting islands do not appear to meet this minimum size. [see §135-5.3.F.(3)(c)]
- Bioretention elements are required to be incorporated into the parking lot design of new vehicular use areas with more than 20 parking spaces [see §135-5.3.F.(5)].
- The calculation for additional plantings [see §135-5.4.A.(3)] in the landscape compliance chart appears to be missing the required multiplier. Therefore, it appears that 67 shrubs would be required, which is less than the proposed 58 shrubs.
- According to the landscape compliance chart, the applicant is requesting multiple waivers related to the minimum native species [see §135-5.8.A.(5)] and minimum species diversity [see §135-5.8.A.(6)] requirements. Specifically, we noted:
    - None of the 53 proposed evergreen shrubs are proposed to be native species. We feel that there are examples of native, evergreen shrubs that could potentially be added to the plant list.
    - Less than 10% of the proposed 821 herbaceous perennial plants are proposed to be native species. We feel that there are examples of native, herbaceous perennial plants that could potentially be added to the plant list.
    - Only two species of evergreen tree are proposed. We feel that there are examples of additional evergreen tree species, including native species, that could potentially be added to the plant list to increase plant diversity.
- Table 5.8.2. specifies minimum plant size and spacing at time of planting for different plant types:
    - Some of the evergreen trees are proposed to be 4-foot tall at time of planting where a minimum height of 8-feet at time of planting is required
    - The size at time of planting of shrubs is specified on Sheet 9 in terms of container size, rather than the minimum height required in Table 5.8.2.
- Additional information may be needed to demonstrate minimum soil volume per tree for any planting areas 1,000 square feet or less in area [see §135-5.8.C.(1)].

LANDSCAPE DESIGN

We wish to offer the following general suggestions regarding the proposed landscape design, recognizing the challenges inherent with the constrained planting areas within the site:

- A row of shrubs is proposed to be planted along the southeastern property line adjacent to existing residential. This row of shrubs appears to be planted on top of a stormwater pipe. We suggest that the position of the shrubs be shifted or the applicant confirm that the proposed depth of the stormwater pipe is such that the shrub plantings will not conflict with it.

- It appears that a tree next to the proposed handicapped parking along the eastern property line is shown to be planted on top of a portion of the proposed underground infiltration basin. Depending on the design and proposed depth of the infiltration basin, this tree location may not be ideal.

EXISTING RETAINING WALLS

We noted that there appear to be existing retaining walls on three sides of the property. It is unclear from the information provided if the proposed development will impact any of the existing retaining walls.

CONCLUSION

We wish to reiterate that MCPC generally supports the proposed development; however, we believe that our suggested revisions will better achieve the township's planning objectives for multifamily residential development.

Please note that the review comments and recommendations contained in this report are advisory to the municipality and final disposition for the approval of any proposal will be made by the municipality.

Should the governing body approve a final plat of this proposal, the applicant must present the plan to our office for seal and signature prior to recording with the Recorder of Deeds office. A paper copy bearing the municipal seal and signature of approval must be supplied for our files. Please print the assigned MCPC number (#24-0256-002) on any plans submitted for final recording.

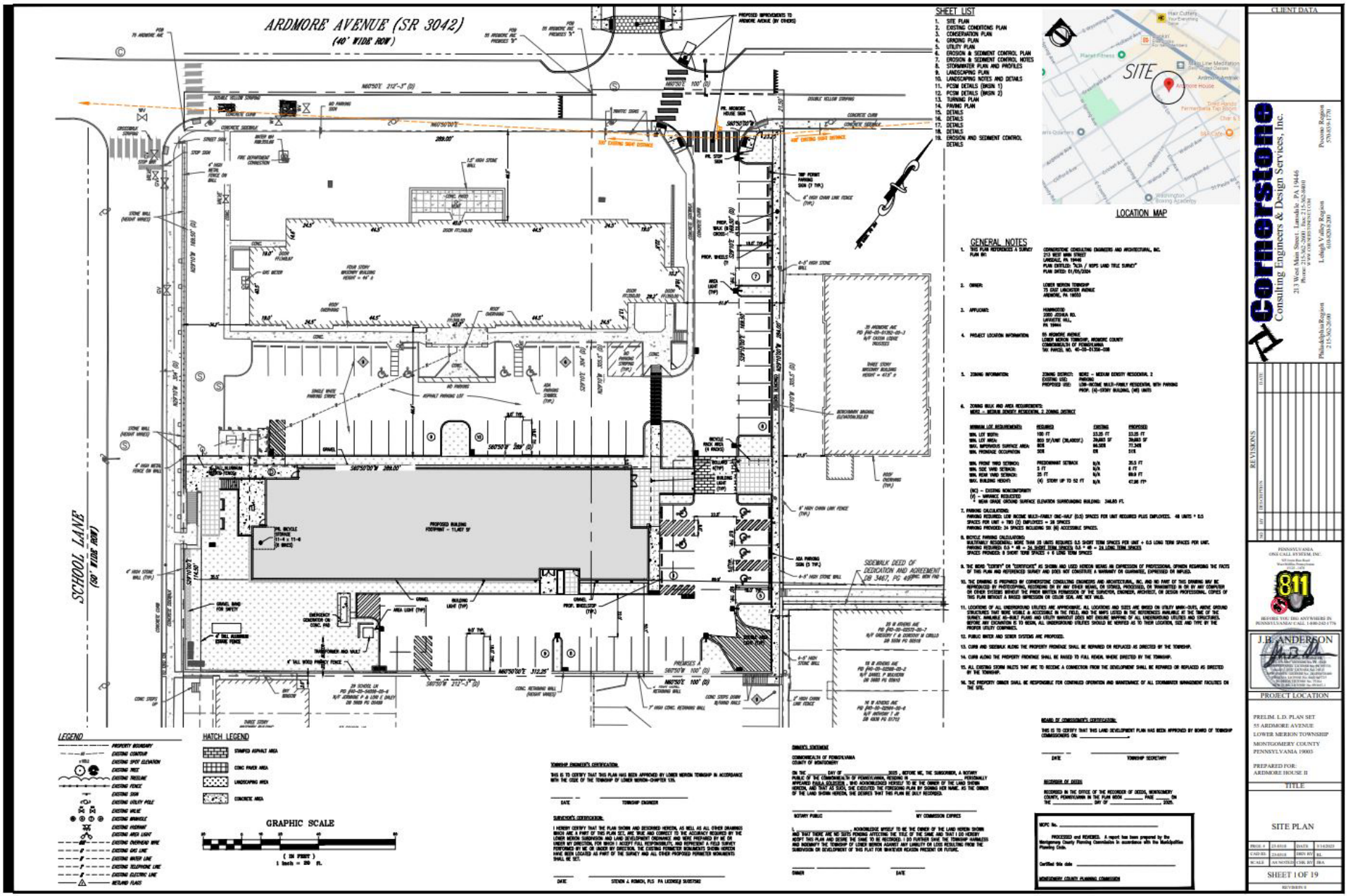
Sincerely,

Marley B Bice

Marley Bice, AICP, Community Planning Assistant Manager
610-278-3740 – marley.bice@montgomerycountypa.gov

c: Vidhi Anderson, Applicant's Representative
Cornerstone Consulting, Applicant's Engineer
Gilbert P. High, Jr., Esq., Twp. Solicitor
Ernie B. McNeely, Twp. Manager
Jody Kelley, Twp. Secretary
Joseph Mastronardo, P.E., Twp. Engineer
Charlie Doyle, Twp. Asst. Dir. of Planning
Colleen Hall, Twp. Senior Planner
Greg Prichard, Twp. Hist. Preserv. Planner
Holly Colello, Twp. Planner
Sarah Carley, Twp. Planner
Hope Viviani, Twp. Planning Technician
Scott Burton; Paul Lutz; Fran Hanney, PennDOT

Attachment A: Reduced Copy of Applicant's Proposed Site Plan
Attachment B: Aerial Image of Site


ARDMORE AVENUE (SR 3042)
(40' WIDE ROW)
SCHOOL LANE
(50' WIDE ROW)
SHEET LIST
1. SITE PLAN
2. EXISTING CONDITIONS PLAN
3. CONSERVATION PLAN
4. GRADING PLAN
5. UTILITY PLAN
6. EROSION & SEDIMENT CONTROL PLAN
7. EROSION & SEDIMENT CONTROL NOTES
8. STORMWATER PLAN AND PROFILES
9. LANDSCAPING PLAN
10. LANDSCAPING NOTES AND DETAILS
11. PCSM DETAILS (BASIN 1)
12. PCSM DETAILS (BASIN 2)
13. TURNING PLAN
14. PAVING PLAN
15. DETAILS
16. DETAILS
17. DETAILS
18. DETAILS
19. EROSION AND SEDIMENT CONTROL DETAILS
SITE
LOCATION MAP
GENERAL NOTES
LEGEND
HATCH LEGEND
GRAPHIC SCALE
SIDEWALK DEED OF DEDICATION AND AGREEMENT
DB 3467, PG 489
PROPOSED BUILDING FOOTPRINT - 11,467 SF
CLIENT DATA
Cornerstone
Consulting Engineers & Design Services, Inc.
213 West Main Street · Lansdale, PA 19446
Phone: 215-362-2600 · Fax: 215-362-8400
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PROJECT LOCATION
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55 ARDMORE AVENUE
LOWER MERION TOWNSHIP
MONTGOMERY COUNTY
PENNSYLVANIA 19003
PREPARED FOR:
ARDMORE HOUSE II
TITLE
SITE PLAN
SHEET 1 OF 19



55 Ardmore Avenue
MCPC#240256002

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Aerial photography provided by Nearmap

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