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SCOTT FRANCE, AICP
EXECUTIVE DIRECTOR

January 30, 2025

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

Re: MCPC #18-0322-007
Plan Name: 1 Belmont Avenue
(17,700 sq. ft. commercial on approximately 6.76 acres)
Situate: City Avenue (N); Belmont Avenue (E)
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 January 17, 2025. We forward this letter as a report of our review and recommendations.

BACKGROUND

The applicant, KGSB, LLC, proposes to construct three new retail commercial buildings, primarily on an existing surface parking lot. An existing eleven-story, 219,390 square foot office building and an existing parking structure on the property are proposed to remain. The property is located in the township's CAD-RCA City Avenue District – Regional Center Area zoning district.

The proposed new buildings are:

- Building 1 located at the intersection of Belmont Avenue and proposed West Road is a single-story retail building containing 6,000 sq. ft.
- Building 2 located at the intersection of Belmont Avenue and City Avenue is a single-story bank building containing 3,500 sq. ft.
- Building 3 located on the City Avenue frontage of the site is a single-story retail building containing a total of 8,200 sq. ft.

Two new minor roads are shown from St. Asaph's Road and Belmont Avenue. A total of 262 surface parking spaces and 22 on-street parking spaces are shown, in addition to 344 parking spaces in the existing parking structure attached to the office building. A central public gathering space totaling 16,119 square feet in area is shown with frontage on Belmont Avenue and West Road.

Additional improvements shown at this time include widened sidewalks along the City Avenue, Belmont Avenue, and St. Asaph's Road frontages of the site; a public multi-purpose path along the City Avenue and St. Asaph's Road frontages of the site; new internal pedestrian pathways; and stormwater management facilities.

According to the information provided, the applicant is seeking conditional use approval to hold a portion of the minimum required parking in reserve and has provided site plan drawings showing the location of a potential parking garage structure in place of the northern surface parking lot. The parking structure, if constructed, would include 16,500 square feet of additional retail space.

In total, the sketch plan submission includes site layouts for four scenarios: a surface parking lot at the corner of St. Asaphs Road and Belmont Avenue, with or without a roundabout at that intersection, and a parking structure at the corner of St. Asaphs Road and Belmont Avenue, with or without a roundabout at that intersection.

COMPREHENSIVE PLAN COMPLIANCE

The City Avenue District area of Lower Merion Township is identified as a Regional Mixed Use Center in the Future Land Use Plan of the Montgomery County Comprehensive Plan, *Montco 2040: A Shared Vision*. Regional Mixed Use Centers are intensely developed suburban cores with significant retail, office, and residential land uses. The proposed development will activate portions of an existing surface parking lot with new uses and create public amenities such as a central gathering space and improved sidewalks, which is generally consistent with the goal to "encourage development and transformative investment where infrastructure already exists."

The Land Use Element of the 2016 Lower Merion Township Comprehensive Plan identifies the City Avenue District area as a Regional Center which is the primary growth area within the township. The proposed development of single-story commercial buildings amongst surface parking does not appear to significantly advance the goal of the Regional Center "to transform the predominant auto-oriented, office based environment into a more functionally diverse live/work/shop environment and a pedestrian-friendly district." However, the proposed development includes amenities that would improve this prominent property, including streetscape improvements, public gathering space, a bus shelter, and outdoor dining.

RECOMMENDATION

The Montgomery County Planning Commission (MCPC) generally supports the applicant's proposal. 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. Frontage Occupation. Section 155-3.5.B.(1) of the township's zoning ordinance establishes how frontage occupation is calculated. Table 6.6.6 states that the minimum primary frontage required in the CAD-RCA zoning district is 60%. It appears that the applicant may be excluding pedestrianways from the frontage occupation calculation, which is permitted by §155-3.5.B.(1). We noted that the township's definition of "pedestrianway" is: "a public or private linear space or an area where the primary users are pedestrians and that may also accommodate bicyclists." In addition, §155-6.6.B.(4) provides additional standards for what is considered a "pedestrianway" within the CAD-RCA, including that "the pedestrianway shall begin at the curbline." The areas identified as "pedestrianway" on the proposed site plan appear to be short segments of additional pavement that may not meet all of the criteria for "pedestrianway".

   In addition, the Primary Frontage Calculation Chart on Sheet C-103 states that some roads are "not a primary frontage", suggesting that the frontage occupation requirement may not apply to those frontages. However, the township's zoning ordinance broadly defines "primary frontage" as "the frontage of a lot facing onto a public or private street", which would appear to apply to more frontages within the development site.

   Overall, we defer to the township regarding the applicability of this definition and the accuracy of the frontage occupation calculations provided.

B. Minimum Building Height. Section 155-6.6.D.(5) establishes a minimum building height for the entire CAD-RCA district of 2 stories, or 28 feet, and that "the second-story floor area shall be equal to or greater than 75% of the grade-level building area." It appears that the applicant proposes single-story buildings.

C. Maximum Driveway Width. Section 155-6.6.H.(2)(c) of the township's zoning ordinance states that the "maximum driveway width is two lanes and 22 feet unless a dedicated separate left-turn egress lane is required, based on a traffic study." The driveway off of St. Asaphs Road appears to be greater than 22 feet in width.

D. Public Gathering Space Design. Standards related to public gathering space are contained in Table 6.6.5 of the township's zoning ordinance. We noted the following potential design questions related to the proposed public gathering space:
   - "A minimum of 30% of the public gathering space shall be landscaped with trees, shrubs, and mixed plantings with year-round interest." *Sheet 1 of 11 of the landscape plan set states that 17.4% is landscaping.*
   - "One bicycle space shall be provided for every 300 square feet of public gathering space." *The proposed public gathering space size of 16,119 square feet would require 54 bicycle parking spaces. No proposed bicycle parking spaces were identified within the public gathering space.*
   - "Location of a public gathering space adjacent to a parking lot is discouraged." *The proposed public gathering space is directly adjacent to the surface parking lot on several sides.*

E. Development Design & Architecture Standards. Development design standards for this zoning district are contained in §155-6.6.I. of the township's zoning ordinance. We noted the following potential design questions related to the development design standards:

- §155-6.6.I.(5)(a) states that "visual mass of all buildings shall be deemphasized through the use of architectural and landscape elements, including form, architectural features and materials, to reduce their apparent *bulk and volume, to enhance visual quality and to contribute to human-scale development." We encourage the applicant to explore additional design elements to emphasize the human-scale of the development. For example, the large, flat parapet wall faces and flush-mounted signage appear to create more of an auto-oriented appearance. Additional roofline articulation and projecting signs oriented towards the pedestrian realm could be beneficial.*
- §155-6.6.I.(5)(c)[4] states that "the second story and above of primary front facades shall contain a minimum of 20% of the façade as clear windows." *It is unclear if this requirement would apply to the proposed buildings.*
- §155-6.6.I.(5)(c)[5] states that "building corners at intersections of public streets shall be visually emphasized through design features […]." *We encourage the applicant to incorporate additional design features to accentuate the prominent building corner at City Avenue and Belmont Avenue.*

F. Greening Standards. Sheet 1 of 11 of the landscape plan set contains information on how the applicant proposes to comply with the greening standards, as required by §155-6.6.K.(2) of the township's zoning ordinance. However, it appears that the applicant is using some elements of the plan that are required by other sections of the zoning (e.g., public gathering space for a FAR bonus, bike parking) towards the greening standards.

In addition, the tables on Sheet 1 of 11 of the landscape plan refer to an outdated section of the township's subdivision and land development ordinance. Greening standards requirements are now contained in §135-5.5.

G. Street Screens. Section 155-8.4.C.(1) of the township's zoning ordinance states that surface parking "shall be masked from frontages by a building, liner, or street screen." A proposed screen wall is shown on the landscaping plan, but is not shown on the civil site plan.

H. Parking Space Dimensions. Table 8.5.1. of the township's zoning ordinance establishes minimum dimensions for off-street parking. It appears that some of the parking spaces within the northern parking lot do not currently meet these minimum dimensions.

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. Public Gathering Space Design. Future versions of the plans should specify how the proposed public gathering space complies with the public gathering space regulations in §135-4.6.B. of the township's subdivision and land development ordinance.

B. Sidewalk across Driveways. Section 135-4.9.F.(2)(a) requires that "the grade and paving of the sidewalk shall be continuous across driveways." Future versions of the plan should be revised to show the grade and pavement material of the proposed sidewalk extending across all of the proposed driveways, such as the driveways from West Road and North Road into the northern parking lot.

C. Pedestrian Access within Parking Lot. Section 135-4.9.Q.(7) contains standards for pedestrian pathways and crosswalks that apply to all surface parking lots with 10 or more new parking spaces. The proposed site plan does not appear to provide any pedestrian pathways through the northern parking lot.

D. Landscape Plan. We have identified the following comments related to the proposed landscape plan as it relates to standards in the township's subdivision and land development ordinance:

- The landscaping requirements table on Sheet 1 of 11 of the landscape plan set does not appear to contain calculations demonstrating compliance with the buffer requirements around site elements such as dumpsters and loading areas (see §135-5.2.F.).
- The northern parking lot, which appears to be a partial reuse of the existing parking lot, does not appear to comply with the parking lot landscaping design standards, such as the requirement that a planting island of at least 340 square feet in area be provided every 12 parking spaces (see §135-5.3). Sheet C-305 contains an alternative layout for the northern parking lot incorporating additional planting islands. We support this alternative layout that would markedly improve the distribution of the proposed tree canopy and visual appearance of this prominent corner of the site and encourage the applicant to pursue this design. If parking spaces that would be lost with the addition of plantings islands need to be replaced, it appears that additional parking spaces could be provided along the West Road frontage of the northern parking lot.
- Several trees are proposed to be planted in large planters within the public gathering space. We support this innovative design choice, but feel that additional information could be helpful to determine if the proposed planters will provide the required amount of soil volume (see §135-5.8.C.). Irrigation systems or other methods to ensure proper watering of trees in planters may also be beneficial.

VEHICULAR CIRCULATION

A. Intersection of West Road with Belmont Avenue. A new road labeled West Road is proposed to be constructed through the site and is shown intersecting Belmont Avenue less than 150 feet from the proposed roundabout with St. Asaph's Road. It is our understanding that additional development, including the construction of a new road intersecting Belmont Avenue, is being proposed on the adjacent site at 121 E. City Avenue. We strongly encourage the applicant to continue to coordinate proactively with the adjacent property owner, PennDOT, and Lower Merion Township to determine the best location for a new intersection along Belmont Avenue, which is a State road. Such discussions could also explore whether a traffic signal at this new intersection would be warranted and whether a pedestrian crossing could be safely accommodated at this location.

B. Placement of Driveway into Northern Parking Lot. The access driveway into the northern parking lot off of West Road is shown in close proximity to the external road of Belmont Avenue. Given this close proximity, it appears likely that queuing cars on West Road waiting to exit the site could potentially block cars from entering or exiting the northern parking lot at this location.

PEDESTRIAN CIRCULATION

A. Handicapped Parking and Access to Existing Office Building. Several handicapped parking spaces are shown on either side of a pedestrian walkway in the southern parking lot near the entrance to the existing office building. An ADA curb ramp is shown on either side of the pedestrian walkway connecting to a loading zone between ADA parking spaces on the civil plan set; however, no curb ramps in these locations are shown on the landscape plan.

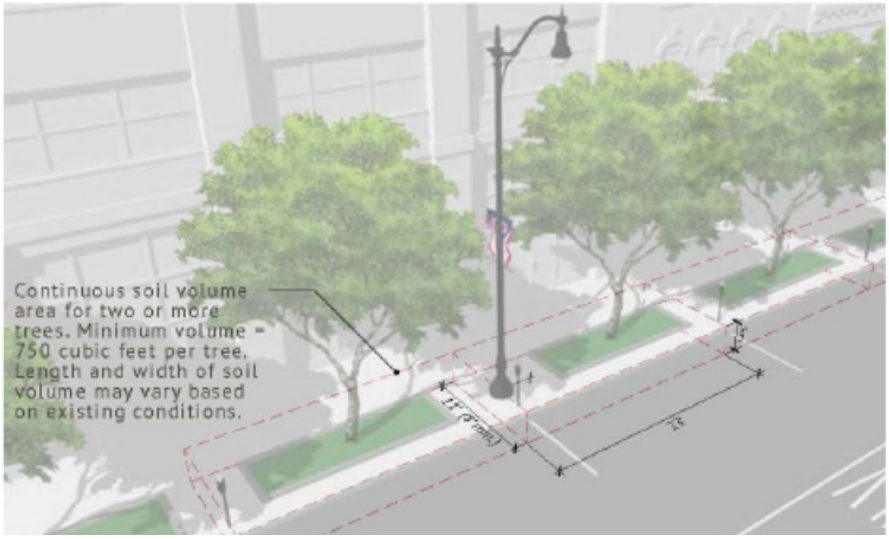
B. Handicapped Parking and Access in Reserve Parking Structure. With regards to the parking structure proposed to be held in-reserve, additional retail space is shown within the parking structure. A single handicapped parking space is shown on the ground floor of the parking structure with additional spaces on upper levels. If plans for the parking garage progress, we encourage the applicant to include an ADA-accessible pathway and marked crossings, if applicable, between the handicapped parking and all proposed retail spaces.

PUBLIC TRANSIT

A proposed bus shelter is shown along City Avenue near the intersection with Belmont Avenue. The township has detailed design guidelines for bus stops and bus shelters in §135-4.9.K. of the township's subdivision and land development ordinance. We encourage the applicant to coordinate with SEPTA and the township to ensure the placement and design of the proposed bus shelter complies with all applicable standards.

STREET TREE PLANTING

We commend the applicant for proposing to plant over 70 street trees to create a cohesive and attractive streetscape throughout the large site. We noted that some street trees are proposed to be planted within landscaped verge strips and other street trees are proposed to be planted in tree pits meeting or exceeding the minimum opening size. However, it is unclear how the minimum soil volume for street trees (§135-5.1.C.(9)) will be provided. In addition, the proposed tree grates must comply with the standards in §135-5.1.C.(9)(a). Alternatively, we encourage the applicant to explore utilizing linear tree plantings areas, as shown in the graphic below from §135-5.8.C. of the township's subdivision and land development ordinance.



FUTURE ROUNDABOUT

The applicant has provided site plans for the intersection of St. Asaphs Road and Belmont Avenue for four scenarios: a surface parking lot at the corner of St. Asaphs Road and Belmont Avenue, with or without a roundabout at that intersection, and a parking structure at the corner of St. Asaphs Road and Belmont Avenue, with or without a roundabout at that intersection. In the development scenario where the parking structure is constructed without a roundabout, it appears that a large landscaped area would be created. If this development scenario progresses, we encourage the applicant to consider creative uses of this area, even if it is temporary. For example, planting this area with a meadow mix could provide additional benefits for pollinators and stormwater management, while also requiring less maintenance in the interim. In addition, the site design in this scenario should consider where pedestrian entrances and walkways to the retail space on the western side of the parking garage would be provided.

ELECTRIC VEHICLE CHARGING STATIONS

The applicant proposes to include seven electric vehicle charging stations in the southern parking lot along the Belmont Avenue frontage. Symbols that appear to indicate electric vehicle charging equipment are shown on the civil site plan; however, these structures are not shown on the landscape plan. In addition, the required screen wall (which is shown on the landscape plan but not the civil site plan) appears to be proposed in the same vicinity. We suggest that the civil site plan and landscape plan be revised to show all proposed improvements in order to determine whether the electric vehicle charging equipment will impact the placement of the proposed screen wall and landscaping in the same vicinity of the parking lot.

BICYCLE PARKING

Several bike racks are shown around the site, primarily along the frontages of West Road and within areas labeled as “pedestrianway” along the City Avenue frontage. We feel that providing bike racks closer to the primary entrances of the proposed commercial buildings would be beneficial, depending on the specific uses proposed. In addition, we encourage the applicant to explore providing bicycle parking for the existing office building.

CITY AVENUE STREETSCAPE

The applicant appears to be providing a unique combination of pathways and streetscape elements and other pedestrian amenities along the City Avenue frontage; however, additional information, such as cross-sections, may be beneficial to understand how the various streetscape elements also relate to the grade on this portion of the site. For example, the civil site plan shows stairs along the City Avenue frontage of Building 2 and several areas of sidewalk that ramp and require handrails.

MULTI-PURPOSE PATHWAYS

We recommend that clearly marked crosswalks be added where any proposed multi-purpose pathway crosses a driveway or new minor street.

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 commercial 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 (#18-0322-007) on any plans submitted for final recording.

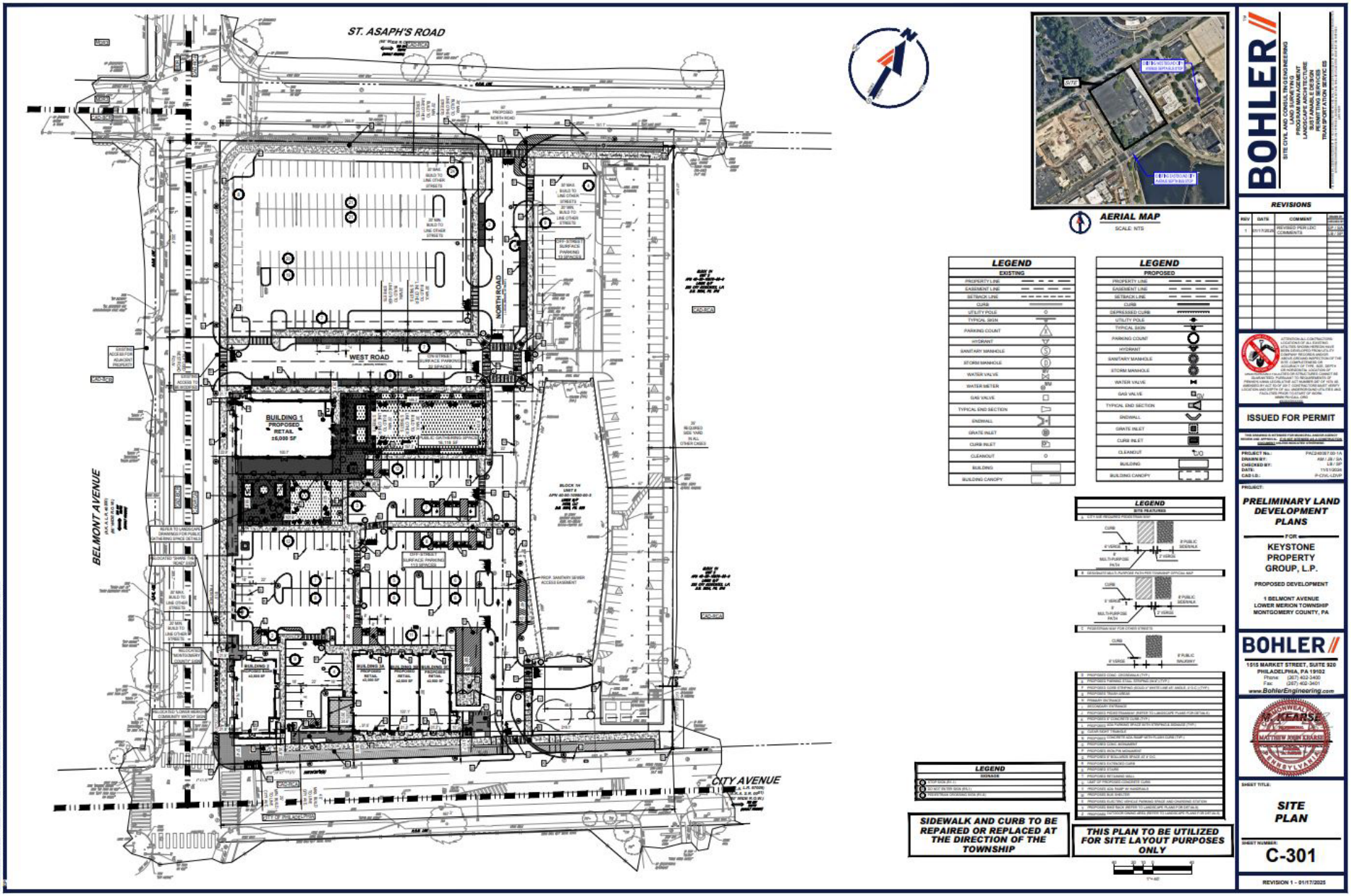
Sincerely,

Marley B Bice

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

c: George Broseman, Applicant's Representative
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
Fran Hanney, Scott Burton, Paul Lutz, PennDOT

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


ST. ASAPH'S ROAD
BELMONT AVENUE
CITY AVENUE
WEST ROAD
NORTH ROAD
BUILDING 1
PROPOSED
RETAIL
±6,000 SF
AERIAL MAP
SCALE: NTS
LEGEND
EXISTING
LEGEND
PROPOSED
LEGEND
SIGNAGE
SIDEWALK AND CURB TO BE REPAIRED OR REPLACED AT THE DIRECTION OF THE TOWNSHIP
THIS PLAN TO BE UTILIZED FOR SITE LAYOUT PURPOSES ONLY
BOHLER
SITE CIVIL AND CONSULTING ENGINEERING
LAND SURVEYING
PROJECT MANAGEMENT
LANDSCAPE ARCHITECTURE
PLANNING
ASSET ANALYSIS & DESIGN
TRANSPORTATION SERVICES
REVISIONS
ISSUED FOR PERMIT
PROJECT No.: PKC240057.00-1A
DRAWN BY: RM / JB / SA
CHECKED BY: LB / SP
DATE: 11/01/2024
CAD I.D.: P-CIVIL-LDVP
PRELIMINARY LAND DEVELOPMENT PLANS
FOR
KEYSTONE PROPERTY GROUP, L.P.
PROPOSED DEVELOPMENT
1 BELMONT AVENUE
LOWER MERION TOWNSHIP
MONTGOMERY COUNTY, PA
1515 MARKET STREET, SUITE 920
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SHEET TITLE:
SITE PLAN
SHEET NUMBER:
C-301
REVISION 1 - 01/17/2025



1 Belmont Avenue
MCPC#180322007

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Aerial photography provided by Nearmap

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