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MONTGOMERY COUNTY
PLANNING COMMISSION

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SCOTT FRANCE, AICP
EXECUTIVE DIRECTOR

January 12, 2026

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

Re: MCPC 25-0150-003
Plan Name: Waverly Heights
(36 dus on approximately 61.8 acres)
Situate: Waverly Road (north)/east of Youngs Ford Road
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 December 18, 2025. We forward this letter as a report of our review.

BACKGROUND

The applicant, Waverly Heights LTD, proposes to demolish 7 existing villa units within the Waverly Heights retirement community and construct 2 four-story apartment buildings with a total of 24 units in their place. Additionally, an addition to the Blair apartment building containing 12 additional units is also proposed. Parking is proposed to be located primarily within the new buildings; however, seven surface parking spaces are also shown along the driveway to the Blair building addition. Additional improvements shown at this time include an expanded amenity space between the Andrews apartment building and Carlton Commons. The property is located in the township's IH-1 Institutional Housing 1 zoning district. A sketch plan for this proposal was previously reviewed in a review letter dated August 8, 2025.

COMPREHENSIVE PLAN COMPLIANCE

The Land Use Element of the 2016 Lower Merion Township Comprehensive Plan identifies this property as Institutional. The township comprehensive plan recognized that the need for expansion of existing elderly housing facilities was likely to be high in the next 25 years.

In addition, this area of the township is identified as a Suburban Residential Area in the Future Land Use Plan of the Montgomery County Comprehensive Plan, *Montco 2040: A Shared Vision*. Primary uses in Suburban Residential Areas include less dense multifamily and single-family attached uses. Residential development in Suburban Residential Areas should match the character and type of housing found in the immediate neighborhood and recreation facilities and central open space should be provided.

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 final plan approval. Our review comments are as follows:

REVIEW COMMENTS

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 property:

A. Maximum Grade of Driveways. Section 135-4.9.P.(8) establishes a maximum permitted grade for driveways. The proposed driveway to the Blair apartment building addition has a proposed slope in excess of 11% for the section of the driveway closest to the garage entrance. In addition, a slope of 9.9% is indicated for the driveway from Copeland Way to Proposed Hybrid Apartments 2. We defer to the township engineer regarding the feasibility of this driveway slope and compliance with Section 135-4.9.P.(8) depending on how the proposed use is classified.

B. Driveways Longer than 200 Feet. Section 135-4.9.P.(10) contains additional standards for driveways which exceed 200 feet in length.

LANDSCAPE PLAN

A. Shade Tree Calculations. The shade tree calculation on Sheet L1 appears to only take into account one side of the frontage of Copeland Way. Section 135-5.1.B.(1) states that shade trees or large

canopy trees shall be required along both sides of all existing streets or common driveways serving five or more residential units.

B. Screening of Site Elements. Section 135-5.2.F.(5) requires that electrical transformers be screened using the screening buffer standards. Two new transformers were identified on Sheet L2, including one along the frontage of Copeland Way and one to the north of the Blair building addition. In addition, it was noted that the transformer shown to the north of the Blair building addition is located in conflict with an existing tree that is not shown to be removed.

   In addition, the location for a proposed 40-foot x 15-foot generator is indicated on Sheet C-303. This facility is not shown on the landscape plan; therefore it does not appear that the screening buffer required around such site elements (Section 135-5.2.F.(5)) is being provided.

C. Stormwater Basin Plantings. Previous submissions noted that the existing stormwater management basins may be modified, if warranted, to accommodate the proposed development. If any changes to the existing stormwater management basins are proposed, additional plantings may be required to comply with Section 135-5.6.

D. Parking Lot Greening. The applicant's vehicular use area (VUA) calculations as indicated on Sheet L2 do not appear to include the vehicular driveway off of Copeland Way to Proposed Hybrid Apartment 2.

   Section 135-5.3.C.(3) of the township's subdivision and land development ordinance requires a minimum design canopy coverage of 85% of the designated interior landscaping area within the vehicular use area. There do not appear to be any canopy trees proposed within the planting areas adjacent to the designated vehicular use area.

E. Minimum Species Diversity. Section 135-5.8.A.(6) establishes minimum species diversity requirements. Based on the plant schedule provided on Sheet L2, it appears that the applicant is not meeting the minimum species diversity requirements for all plant types. For example, 613 groundcover plantings of a single species are proposed where a minimum of 12 different species is required.

F. Relationship to Sight Triangles. Section 135-4.9.P.(9) of the township's subdivision and land development ordinance requires that sight distance be determined where new driveways intersect with existing roads. The applicant's letter dated December 16, 2025 responding to the conditions of approval (#25 – Driveway) states that sight distance and sight triangles are provided on the landscape plan; however, this information was not able to be located on the landscape plan.

   In addition, the applicant states that the driveway leading to the Blair Addition is existing and therefore a sight distance calculation is not provided for that driveway; however, we suggest that the sight triangle at the existing driveway still be shown on the landscape plan in order to ensure any proposed landscaping is located properly relative to the sight triangle.

G. Tree Protection Fencing. The location of tree protection fence is shown on Sheet L2; however, it appears that grading is proposed within the required tree protection zone (as defined in §101-3 of

the Natural Features Conservation chapter) of several existing trees proposed to remain to the east of Proposed Hybrid Apartment 2.

H. General Landscaping Comment. We noted that the amount and location of landscaping shown to be proposed is not consistent between the landscape plan and the landscaping shown in the exterior renderings submitted. For example, the architectural renderings show trees planted between the terraced retaining walls; however, these trees are not shown on the landscape plan. We encourage the applicant to ensure consistency between all materials submitted and evaluate their proposal to ensure they are maximizing landscaping.

SITE GRADING AND RETAINING WALLS

Areas of steep grading are shown on the proposed grading and drainage plan. A slope in excess of 19% is proposed to the north of the Blair apartment building addition. This grading appears as if it may cause stormwater runoff to be directed towards the existing villa units to the north, therefore additional drainage improvements may need to be considered in this area.

The applicant's letter dated December 16, 2025 responding to the conditions of approval (#18 – Retaining Walls) states that "no retaining walls exceed four (4) feet in height." However, the applicant's code relief form dated December 15, 2025 states that "retaining walls (maximum 8 FT) are also proposed to minimize steep slope areas where feasible." The maximum height of the retaining walls proposed should be clarified as additional requirements apply to any retaining walls exceeding 4 feet in height. Additional information may also be needed regarding the height and material of the proposed retaining walls in order to determine compliance with Sections 155-4.4.E.(3) and 155-3.7 of the township's zoning ordinance.

ELECTRIC VEHICLE CHARGING STATIONS

Two of the proposed surface parking spaces are shown to be reserved for electric vehicle charging; however, the location of the electric vehicle charging equipment does not appear to be shown. Future submissions should include the location of any physical equipment and utility connections needed to serve these electric vehicle charging spaces in order to determine if any conflicts with proposed retaining walls or landscaping would be created.

PARKING

Four existing parking spaces off of Copeland Way, to the north of Proposed Hybrid Apartment 1, are shown to remain on the site plan but shown to be removed and replaced with street trees on the landscape plan. We suggest that this discrepancy between the plan sets be addressed and any parking and landscaping calculations be adjusted accordingly.

STORMWATER MANAGEMENT

A large underground stormwater basin is now shown to the east of the Blair Building addition. There is very little information shown for this portion of the site, including existing and proposed grading, and any landscaping that is proposed to be removed or planted.

CONCLUSION

We wish to reiterate that MCPC generally supports the proposed development; however, we believe that our suggested revisions will better achieve Lower Merion Township's planning objectives for elderly housing 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 (#25-0150-003) 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: Waverly Heights LTD, Applicant
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. Historic Preservation Planner
Holly Colello, Twp. Planner
Sarah Carley, Twp. Planner
Angela Forney, Twp. Planning Technician

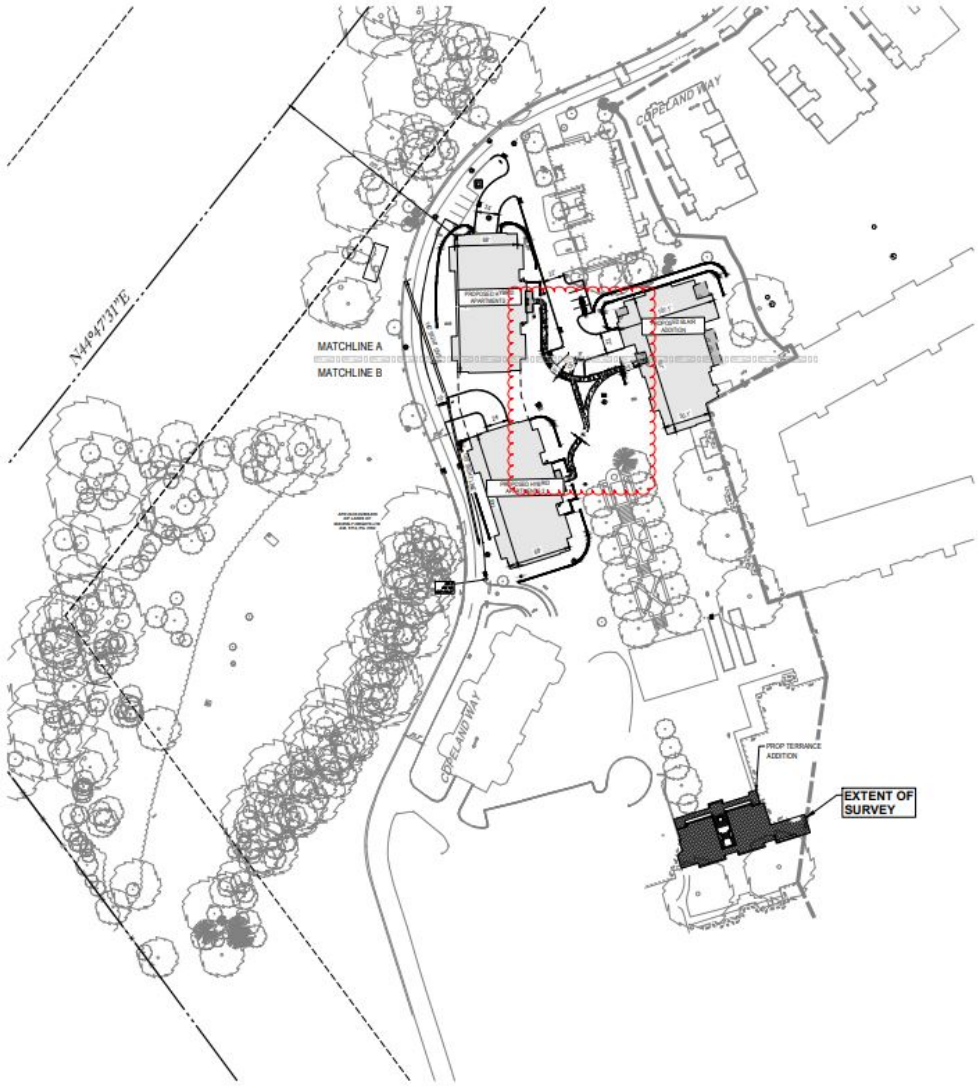
Attachment A: Reduced Copy of Applicant's Proposed Site Plan
Attachment B: Aerial Image of Site

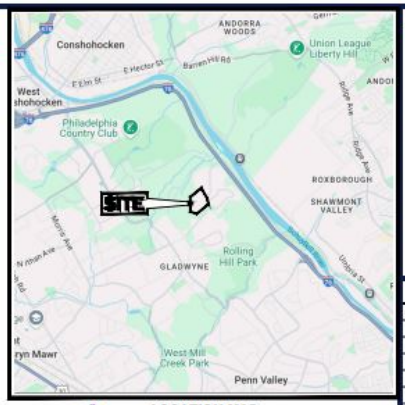
AVERAGE BUILDING HEIGHT CHART			
	BLAIR ADDITION	HYBRID APARTMENT 1	HYBRID APARTMENT 2
AVERAGE PROPOSED GRADE	335.98	306.53	316.67
ALLOWABLE BUILDING HEIGHT BY ORDINANCE	40 FT	40 FT	40 FT
MAXIMUM BUILDING HEIGHT	39.5 FT	37.8 FT	39.0 FT

PARKING REQUIREMENTS

ITEM	CODE	PERMITTED	PROPOSED
MIN STALL SIZE (90 DEG STANDARD SPACE)	§ 155-6.5.1	9' X 18'	9' X 18'
MIN AISLE WIDTH (TWO WAY)	§ 155-6.1	22'	22'
MIN NUMBER OF STALLS	§ 155-6.1	33*	70
MIN ELECTRIC VEHICLE PARKING	§ 134-4.9	**	10

* 1 PER STAFF + 0.5 PER ASSISTED LIVING UNIT + 1 PER INDEPENDENT LIVING UNIT: 28 NEW INDEPENDENT LIVING UNITS + 6 STAFF = 34 PARKING SPACES REQUIRED.
** 20% OF REQUIRED SPACES TO BE EQUIPPED FOR ELECTRIC VEHICLE SPACES + 7 ELECTRIC VEHICLE SPACES REQUIRED





LOCATION MAP
SCALE: 1" = 2,000'
SOURCE: GOOGLE MAPS

ZONING TABLE

ZONE: IH1 INSTITUTIONAL HOUSING 1
EXISTING USE: CONTINUING CARE FACILITY
PROPOSED USE: CONTINUING CARE FACILITY

APPLICANT / OWNER INFORMATION

APPLICANT:	WAVERLY HEIGHTS 1400 WAVERLY HEIGHTS GLADWYNE, PA 19035
PROPERTY OWNER:	WAVERLY HEIGHTS LTD 1400 WAVERLY ROAD GLADWYNE, PA 19035

BULK REQUIREMENTS

ITEM	CODE	PERMITTED	EXISTING	PROPOSED
MIN LOT AREA	§ 155-6.4.F	25 AC	61.81 AC	NO CHANGE
MIN LOT WIDTH	§ 155-6.4.K	150.0'	1,417.8'	NO CHANGE
MAX IMPERVIOUS COVER	§ 155-6.4.K	32.3%*	27.3% (754,333 SF)	28.3% (782,858 SF)
MAX GROSS DENSITY	§ 155-6.4.F	6 DWELLINGS PER ACRE	3.53 (216 INDEPENDENT LIVING UNITS / 61.81 AC)	4.06 (247 INDEPENDENT LIVING UNITS / 61.81 AC)
ASSISTED LIVING UNITS	§ 155-6.4.F	25% MINIMUM, 65% MAXIMUM	99 (65%)	99 (40%)
MIN YARD SETBACKS				
FRONT YARD	§ 155-6.4.F	150'	150'	NO CHANGE
SIDE YARD	§ 155-6.4.F	150'	156.6'	NO CHANGE
REAR YARD	§ 155-6.4.F	150'	247.3'	225.4'
MAX PERMITTED HEIGHT	§ 155-6.4.F	2 STORIES UP TO 40'	68'-6" **	NO CHANGE
MIN PARKING SETBACKS				
FRONT	§ 155-6.4.F	20' BUFFER	91.3'	NO CHANGE
SIDE	§ 155-6.4.F	20' BUFFER	160.4'	NO CHANGE

* PER CODE SECTION 155-6.4F(3)(E), A LOT LEGALLY IN EXISTENCE ON THE EFFECTIVE DATE OF THIS CODE WHICH BECAME NONCONFORMING OR WITHIN 5% OF THE MAXIMUM IMPERVIOUS SURFACE PERMITTED, TO SUCH IMPERVIOUS SURFACE PROVISIONS MAY EXPAND THE IMPERVIOUS SURFACE ON SUCH LOT BY UP TO 5%. THEREFORE, THE SITE IS PERMITTED 27.3 + 5 = 32.3%
** PROPOSED BUILDINGS 1 AND 2 AND PROPOSED ADDITION WILL BE MAXIMUM 45 FT HIGH

LEGEND
PROPOSED

BUILDING
BUILDING BELOW
LANDSCAPE AREA
SIDEWALK
RETAINING WALL
CONCRETE CURB
FLUSH CURB
FENCE
SETBACK LINE
LIMIT OF DISTURBANCE
ACCESSIBLE SYMBOL
SIGN
PARKING COUNT
YARD DRAIN
INLET

LEGEND
EXISTING

BUILDING
RETAINING WALL
CONCRETE CURB
FLUSH CURB
FENCE
GUIDE RAIL
PROPERTY LINE
R.O.W. LINE
ADJACENT PROPERTY LINE
EASEMENT LINE
SETBACK LINE
ACCESSIBLE SYMBOL
CONCRETE MONUMENT/ IRON PIN
SIGN
PARKING COUNT
AREA LIGHT
TREE
DRAINAGE INLET
STORM/SANITARY MANHOLE
WATER/GAS VALVES
ROOF DRAIN/CLEANOUT
FIRE HYDRANT
UTILITY POLE W/ LIGHT
UTILITY POLE

BOHLER
SITE/CIVIL AND CONSULTING ENGINEERING
LAND SURVEYING
PROGRAM MANAGEMENT
LANDSCAPE ARCHITECTURE
SUSTAINABLE DESIGN
PERMITTING SERVICES
TRANSPORTATION

REVISIONS

REV	DATE	COMMENT	CHKD

ATTENTION ALL CONTRACTORS:
LOCATIONS OF ALL EXISTING UTILITIES SHOWN HEREIN HAVE BEEN DEVELOPED FROM UTILITY COMPANY RECORDS AND/OR FIELD LOCATIONS. PRIOR TO THE START OF THE SITE CONSTRUCTION OR ANY EXCAVATION, THE CONTRACTOR IS RESPONSIBLE FOR CONTACTING ALL UTILITY COMPANIES FOR THE EXACT FIELD LOCATION OF ALL UTILITIES. THE CONTRACTOR IS RESPONSIBLE FOR THE PROTECTION AND SUPPORT OF ALL UTILITIES AND STRUCTURES IN THE VICINITY OF THE WORK AREA. THE CONTRACTOR SHALL NOTIFY ALL UTILITY COMPANIES IN ACCORDANCE WITH PENNSYLVANIA ACT 187 OF 1996 AS AMENDED BY ACT 50 OF 2017. CONTRACTORS MUST VERIFY LOCATION AND DEPTH OF ALL UNDERGROUND UTILITIES AND FACILITIES PRIOR TO START OF WORK.
811 PA ONE-CALL SERIAL #: 20253000000

THIS DRAWING IS INTENDED FOR MUNICIPAL AND/OR AGENCY REVIEW AND APPROVAL. IT IS NOT INTENDED AS CONSTRUCTION DOCUMENTS AND SHOULD NOT BE CONSIDERED.

PROJECT No.: PAC240213.03-0A
DRAWN BY: KBH
CHECKED BY: AA
DATE: 12/15/2025
CAD I.D.: P-PRLIM-LDVP

PROJECT:
PRELIMINARY LAND DEVELOPMENT PLANS
FOR
WAVERLY HEIGHTS
PROPOSED DEVELOPMENT
1400 WAVERLY ROAD
GLADWYNE, PA 19035
LOWER MERION TOWNSHIP

BOHLER
1515 MARKET STREET, SUITE 920
PHILADELPHIA, PA 19102
Phone: (267) 402-3400
Fax: (267) 402-3401
www.BohlerEngineering.com

COMMONWEALTH OF PENNSYLVANIA
LICENSED
MATTHEW JOHN KRAMER
PROFESSIONAL ENGINEER
PENNSYLVANIA

SHEET TITLE:
OVERALL SITE PLAN
SHEET NUMBER:
C-302
ORG. DATE - 12/15/2025



Waverly Heights
MCPC#250150003

Montgomery County Planning Commission

0 250 500 1,000 Feet

N