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JODY L. HOLTON, AICP
EXECUTIVE DIRECTOR

July 24, 2019

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

Re: MCPC #19-0096-001
Plan Name: One & Three Bala Plaza
(1 lot/1,012 du and 1,237,018 sq. ft. commercial on approximately 50.2 acres)
Situate: St. Asaphs Road (north)/Belmont Avenue (east)
Township of Lower Merion

Dear Mr. Leswing:

We have reviewed the above-referenced tentative sketch plan as you requested on April 18, 2019. We forward this letter as a report of our review.

BACKGROUND

The applicant, Bala Plaza, Inc., proposes to consolidate two lots known as One and Three Bala Plaza to create an approximately 50-acre lot and construct eleven new buildings. Three existing office buildings totaling 742,413 square feet are proposed to remain. The property is located in the township's CAD-RCA City Avenue District - Regional Center Area zoning district.

The new buildings are proposed to be constructed in four phases:

Phase 1

- Building "R1-B" located along St. Asaphs Road adjacent to the existing One Bala Plaza building contains 44,813 square feet of retail, 14,000 square feet of restaurant, and 277 residential units with a parking deck below
- Building "C1" located adjacent to Building "R1-B" contains 9,500 square feet of office and 9,500 square feet of retail
- A 168-room hotel with a parking deck below located near the intersection of St. Asaphs Road and Decker Boulevard



Phase 2

- Building “R1-C” located between the existing One Bala Plaza building and St. Asaphs Road contains 21,567 square feet retail on the ground floor and 104 residential units
- Building “R2-C” located between the existing Three Bala Plaza East building and the rear property line contains 148 residential units with a parking garage
- Building “Office North” located to the north of the existing One Bala Plaza building contains 325,216 square feet of office, 24,970 square feet of retail, and 8,000 square feet of restaurant

Phase 3

- Building “R1-A” located near the intersection of St. Asaphs Road and Belmont Avenue contains 28,857 square feet of retail on the ground floor and 107 residential units with a parking deck below
- Building “R2-A” located near the intersection of St. Asaphs Road and Monument Road contains 23,883 square feet of retail on the ground floor with 184 residential units and a parking deck below
- Building “Office North 2” located between the existing Three Bala Plaza West and the rear property line contains 214,878 square feet of office with a parking garage

Phase 4

- Building “Office South” located near the intersection of Belmont Avenue and Righters Ferry Road contains 249,813 square feet of office, 46,703 square feet of retail, and 12, 200 square feet of restaurant
- Building “R2-B” located to the east of the existing Three Bala Plaza East building contains 27,523 square feet of retail on the ground floor and 192 residential units with a parking deck below

A new system of internal roads and driveways is shown connecting to two existing traffic signals along St Asaphs Road at Decker Boulevard and at Kings Grant Drive. The access driveways to the site from Belmont Avenue and Monument Road are shown to be relocated. A total of 675 surface parking spaces and 5,804 structured and below-grade parking spaces are proposed. A 261,950-square foot public gathering space is shown in the center of the site. Two smaller public gathering spaces with rain gardens and bike parking are shown along St. Asaphs Road at Monument Road and at Belmont Avenue.

Additional improvements shown at this time include: widened sidewalks along the St. Asaphs Road, Monument Road, Belmont Avenue, and Righters Ferry Road frontages of the site; a public multi-purpose path along the rear property line connecting Belmont Avenue and Monument Road; stormwater management facilities; and new internal pedestrian pathways.

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, *Montco2040: A Shared Vision*. Regional Mixed Use Centers are intensely developed suburban cores with significant retail, office, and residential land uses. The proposed development 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 is generally consistent with the goal of the Regional Center “to transform the predominant auto-oriented, office based environment into a more functionally diverse live/work/shop environment;” however, we encourage the applicant to coordinate with the township to ensure the proposed configuration of new buildings, streets, and pathways helps to advance the goal to create “a pedestrian-friendly district.”

RECOMMENDATION

The Montgomery County Planning Commission (MCPC) generally supports the applicant’s proposal. However, in the course of our review we identified the following issues that we feel should be addressed prior to moving forward with the land development. 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 township’s Zoning Ordinance that we feel should be addressed as part of any future land development submissions associated with this project:

- A. Maximum Lot Width. Section 155-217.C.(5)(c) of the township’s Zoning Ordinance states that “where additional development is proposed on an existing lot wider than 600 feet, new minor streets shall be constructed to conform to the requirements for a maximum frontage of 600 feet between intersections with public or private access streets.” In addition, §155-217.C.(5)(e) states that “where lots front on more than one street, the maximum lot dimension of 600 feet applies to all street frontages.” The St. Asaphs Road, Monument Road, and Belmont Avenue frontages of the site currently exceed the maximum lot width dimension of 600 feet.

The applicant is proposing to relocate the existing driveways on Monument Road and Belmont Avenue and construct several new internal roadways. However, it is unclear from the information provided whether the applicant intends for the proposed internal roadways to be considered new streets in relation to meeting this zoning requirement. In addition, the applicant is proposing to maintain two existing driveways on to St. Asaphs Road, which are spaced at greater than 600 feet apart; however it is important to note that these existing driveways are located at existing, signalized intersections that appear to be well-spaced between the additional existing signalized intersections along St. Asaphs Road at Monument Road and at Belmont Avenue.

- B. Maximum Driveway Width. Section 155-217.D.(1)(e) 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.” It appears that all of the driveways into the site are greater than 22 feet in width, including the new, relocated driveways from Monument Road and Belmont Avenue.
- C. On-Street Parking. Section 155-217.D.(5)(b) of the township’s Zoning Ordinance states that “on-street parking spaces shall be required on both sides of all newly constructed minor streets.” In addition, §155-217.C.(5)(f) states that “the land area required to provide new streets to comply with the lot width provisions may continue to be counted as lot area for purposes of compliance with this article, provided that the new streets include public on-street parking on both sides of the street.” If the proposed internal

roadways are intended to be considered “minor streets” as it relates to the township’s zoning requirements, then it appears that additional on-street parking may need to be provided in order to meet this requirement.

- D. Drop-off Areas. Several proposed drop-off areas are shown along the proposed internal streets. Section 155-217.C.(2)(d) of the township’s Zoning Ordinance states that “parking lots, driveways, loading/unloading zones and other auto-related areas are prohibited in front of the building.” One exception to this requirement is for “the primary pick-up and drop-off area for hotel guests.” Therefore the drop-off area shown in front of the proposed hotel appears to be permitted. However, we encourage the applicant to explore alternative locations for the other drop-off areas and to ensure that their design and location fits into the larger circulation pattern for the site.
- E. Phasing and Density Increases. According to the information provided on Sheet 1 of 3 labeled “Concept Development Plan,” the applicant proposes to construct the improvements over a series of four phases. It appears that some of the improvements (including public gathering spaces, structured/underground parking, and public multi-purpose pathways) that the applicant proposes to provide in order to qualify for the proposed the floor area ratio (FAR) bonuses needed for the total amount of development, would be constructed during certain phases of the development.

We feel that ideally all of the proposed improvements needed to achieve the desired total FAR should be provided during the first phase of development; however, overall we encourage the applicant to coordinate closely with the township to ensure that all of the proposed improvements are being implemented during, or prior to, the development phase in which the development FAR reaches a level that triggers the need for the additional FAR bonuses being proposed.

- F. Greening Standards. Future versions of the plans should demonstrate how the applicant proposes to comply with the greening standards, as required by §155-217.C.(7) of the township’s Zoning Ordinance.
- G. Development Design Standards. Future versions of the plans should demonstrate how the applicant proposes to comply with the development design standards, as required by §155-217.F. of the township’s Zoning Ordinance.

SITE LAYOUT

The applicant proposes to redevelop the site by adding 11 new buildings with a mix of office, retail, restaurant, residential, and hotel uses; in addition to the 3 existing office buildings on the combined 50 acre site. This level of proposed development has the potential to significantly transform the St. Asaphs Road corridor and the City Avenue District as a whole. Due to the significance of the proposed development we wish to offer two conceptual alternative site layouts (see Attachments B and C) that illustrate the following general site layout comments:

- A. Design of Proposed Road. A series of new internal roads are shown through the site; however, the internal roads are laid out so that several offset intersections between the internal roads are created. We encourage the applicant to consider laying out the site based on a more simplified internal loop road structure. For example, the proposed road that extends from Decker Boulevard effectively bisecting the site could be eliminated by simplifying vehicular access and circulation along an internal loop road. The three existing office buildings that are proposed to remain on the site could then be linked together by a more pedestrian-friendly, green space that could also serve as a central gathering space (as illustrated in Attachment B) or as a green space extension of the retail and residential uses (as illustrated in Attachment C).

Overall, establishing a hierarchy of roads by reducing the number of offset intersections and making the vehicular path through the site clearer could be beneficial and allow for additional public green space and usable pedestrian and bicycle pathways. We recognize that the internal road extending through the site from Decker Boulevard is shown on the City Avenue District Official Map. We support any collaborative efforts between the applicant and the township to refine the proposed street layout on the official map to achieve the most efficient site layout for this large site. MCPC is available to assist with these efforts as well.

- B. Distribution of Uses. Currently, the proposed office buildings are shown towards the rear of the property backing up to existing single-family residential homes as well as an apartment building that is under construction along Righters Ferry Road. In the current proposal, the residential buildings are primarily concentrated along the southern frontage of the site between the existing office buildings and St. Asaphs Road. We feel that concentrating the residential buildings along the rear property line and along Belmont Avenue could create a more appropriate transition between the existing adjacent residential and the higher-intensity mixed-use development.

Both of the attached conceptual site layouts (see Attachments B and C) show residential buildings abutting existing residential to the north along Righters Ferry Road and to the west along Belmont Avenue with a deep, landscaped setback. The office buildings could then be concentrated along St. Asaphs Road. Future residents and office workers could support ground floor retail on the new, walkable internal streets. In general, restaurant and retail spaces should front on the internal streets or green spaces. A hotel could be accommodated on the site either integrated into the retail street frontage of the internal loop road near the intersection of St. Asaphs Road and Kings Grant Drive (as illustrated in Attachment B) or as a focal building near the intersection of St. Asaphs Road and Decker Boulevard (as illustrated in Attachment C).

- C. Public Gathering Space. The applicant proposes to provide two public gathering spaces along St. Asaphs Road at Monument Road and Belmont Avenue, similar to the locations of public gathering space shown on the City Avenue District Official Map. However, these public gathering spaces are outward-facing and disconnected from the proposed buildings internal to the site and therefore will not conveniently serve the recreational needs of future residents and workers on the site. Although these two corner public gathering spaces connect to the proposed multi-user pathway along St. Asaphs Road and could serve as a resting spot for users of the pathway, there are no pedestrian connections shown between the corner public gathering spaces and the proposed buildings. The applicant also proposes a central public gathering space between Three Bala Plaza East and a proposed hotel; however, this green space is bisected by an internal roadway and additional information regarding the proposed landscaping and amenities within the green space is needed in order to understand the purpose and character of the space.

“Bala Plaza Concept Sketch 1” (Attachment B) shows a central green space linking the three existing office buildings and several pedestrian connections across the site. Alternatively, “Bala Plaza Concept Sketch 2” (Attachment C) shows the central gathering space located in the northwestern corner of the center block so that it is oriented to the street adjacent to several retail frontages. In either alternative configuration, a larger, uninterrupted central green space could accommodate larger events such as movie nights, farmers markets, and food truck festivals that could contribute to the livability of the site. In addition, if it is deemed necessary, a pathway through the central green space could potentially be designed to accommodate emergency vehicle access.

- D. Building Height. The current proposed site plan shows the proposed building height on the site ranging between 35 and 150 feet. Some of the tallest buildings are proposed to be located towards the rear of the site backing up to existing single-family residential homes as well as an apartment building that is under construction along Righters Ferry Road. The attached conceptual site layouts include illustrations indicating

a potential redistribution for the proposed height on the site. Lower building heights are shown to the rear of the site as a between the proposed mixed-use development and the existing homes. Slightly taller buildings are shown at entrances to the site from Belmont Avenue and Monument Road, and the tallest buildings are shown along St. Asaphs Road

VEHICULAR CIRCULATION

- A. Driveway Off of Belmont Avenue. The proposed driveway off of Belmont Avenue into the site appears to be proposed to be shifted south from its current location so that it creates a four-way intersection with Llanberris Road. Belmont Avenue is a state road, therefore we encourage the applicant to proactively coordinate with PennDOT and the township to determine the best location for a new intersection along Belmont Avenue and to discuss whether any additional traffic controls may be needed at this location.
- B. Truck Circulation. Future versions of the plans should include a truck turning template demonstrating that large vehicles, including ambulances and fire trucks, can safely access the site.
- C. Drop-Off Circles. Several drop-off circles are shown along the internal roadways. Additional pavement markings, curbing, and other traffic controls may be needed to clearly delineate the direction of traffic flow entering and exiting each drop-off circle.

CONNECTION TO OTHER PROPOSED DEVELOPMENT

We have been notified that the applicant is also proposing a mixed-use development on the property known as Two Bala Plaza located across St. Asaphs Road from this property. The further development of both of these properties with additional residential, retail, office, and public gathering spaces creates an important opportunity to ensure that these two large sites are well connected so that future workers and residents on both sites can access and utilize the amenities on either site.

In particular, we feel that it is important to improve all of the signalized intersections along St. Asaphs Road with high-visibility continental-style crosswalks and pedestrian push-button signals to improve pedestrian connections between the two sites. Improved pedestrian crossings at all intersections, as well as wayfinding signage, would also help to improve pedestrian access to and from the existing SEPTA bus stops located along City Avenue.

LANDSCAPE DESIGN

In general, future versions of the plans should include a detailed landscape plan, including wooded lot calculations. In addition, street trees should be provided along all existing and proposed street frontages.

CONCLUSION

We wish to reiterate that MCPC generally supports the applicant's proposal to construct several new residential, office, and mixed use buildings; however we believe that our suggested revisions will help the development better achieve the township's planning objectives for the City Avenue District – Regional Center Area.

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 (#19-0096-001) on any plans submitted for final recording.

Sincerely,

A handwritten signature in black ink that reads "Marley Bice". The signature is written in a cursive, flowing style.

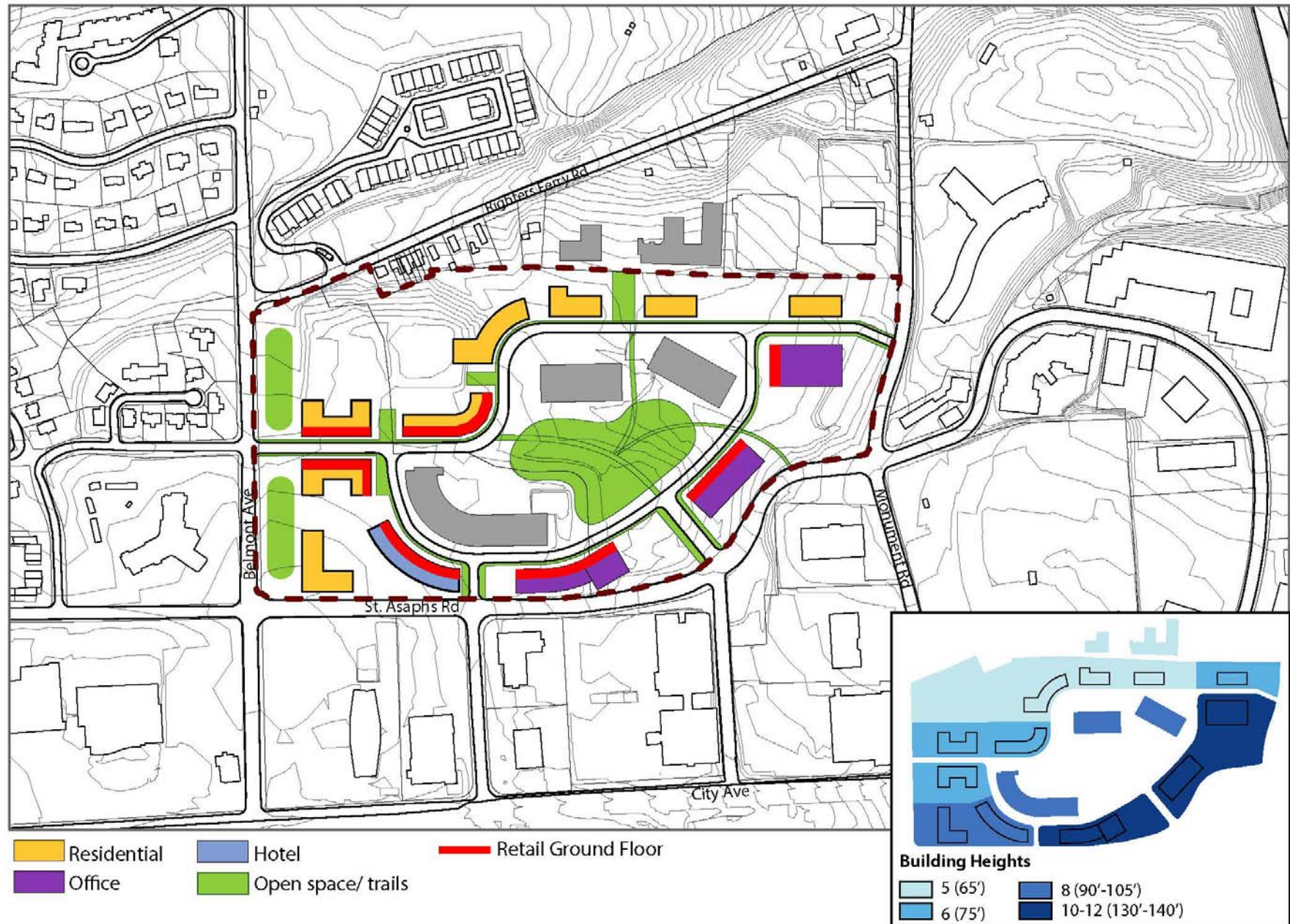
Marley Bice, AICP, Principal Planner
610-278-3740 – mbice@montcopa.org

c: Bala Plaza Property, Inc., Applicant
Alfred R. Fuscaldo, Applicant's Representative
Momenec Inc., Applicant's Engineer
Gilbert P. High, Jr., Esq., Twp. Solicitor
Ernie B. McNeely, Twp. Manager
Edward P. Pluciennik, P.E., Twp. Engineer
Fran Hanney, PennDOT

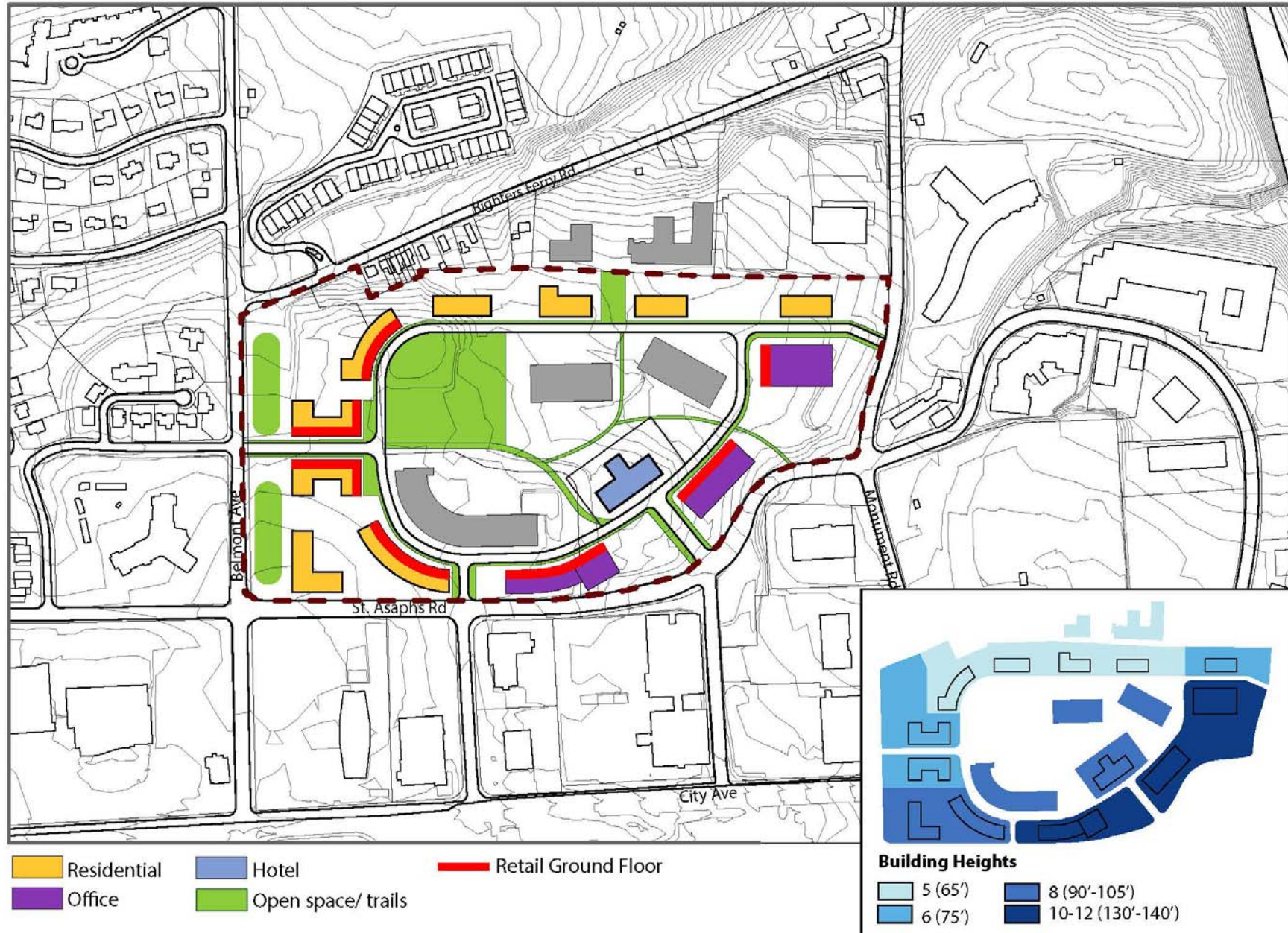
Attachment A: Reduced Copy of Applicant's Proposed Site Plan
Attachment B: Bala Plaza Conceptual Sketch 1
Attachment C: Bala Plaza Conceptual Sketch 2
Attachment D: Aerial Image of Site



Bala Plaza Conceptual Sketch 1



Bala Plaza Conceptual Sketch 2





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Delaware Valley Regional Planning Commission

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