



## MONTGOMERY COUNTY PLANNING COMMISSION

box 311 · norristown · pennsylvania · 19404-0311 · (610) 278-3722  
office location: suite 201 · one montgomery plaza · swede & airy streets · norristown, pa  
FAX (610) 278-3941 · Website [www.montcopa.org/plancom](http://www.montcopa.org/plancom)

December 22, 2000

Mr. Robert A. Ford, Assistant Manager  
Whitemarsh Township  
616 Germantown Pike  
Lafayette Hill, PA 19444-1821

Re: MCPC # 00-330  
Municipality # SLD-9-00  
Plan Name: the Hill at Whitemarsh  
(1 lot/354 dus comprising 5.0 acres)  
Situat: South of fourtown Road and  
West of Thomas Road  
Whitemarsh Township

Applicant's Name and Address  
Whitemarsh Retirement Partners, LLC  
1234 Market Street  
PO Box 449  
Lafayette Hill, PA 19444

Contact: James Garrity  
Phone: (610) 825-8400

Dear Mr. Ford:

We have reviewed the above referenced subdivision/land development and zoning ordinance/map amendments in accordance with Sections 502, 505 and 609 of Act 247, "The Pennsylvania Municipalities Planning Code" as you requested on August 18, 2000. We forward this letter as a report of our review and recommendations.

### **BACKGROUND**

This is a twofold review. It reviews the applicant's proposal for a zoning text and map amendment, but also a submitted Sketch plan for a development that could be constructed if the township approves the amendment. The ordinance and map amendment are for a new zoning district, the CCRC Continuing Care Retirement Community, which is proposed for 94.6 acres at the southwest center of Thomas and Flourtown Roads.

The submitted Sketch plan proposes 354 dwellings units in single family detached, single family quad units or multi-family dwellings. Independent and assisted living, along with skilled care is envisioned. The proposed dwelling units per acre is 3.74. A total of 508 parking spaces are proposed. Parking will be both underground and surface.

Currently this site is impacted by two different zoning classifications and owners. Approximately 41.2 acres of the site is owned by Eugenia Hospital. This land has had the institutional overlay district applied to it. The underlying zoning is AAA Residential. The remaining 52.8 + acres are owned by the Dixon Family and are part of Erdenheim Farm. Presently used as pasture land, this property is also zoned AAA Residential.

## **REVIEW**

Concept. Overall, we are not opposed to this use at this site. We realize that there is a need for this type of housing in the township and that the draft Comprehensive Plan identifies this site as a potential location. However we are concerned about the increase in density, which is proposed to be raised from 1 du per acre to 4. We believe that this increase creates too dense a project for the proposed site. While we realize that some increase may be appropriate, it should be had to benefit the township and, in particular, this area. A reasonable benefit would be to increase the amount of open space preserved as part of this development. A well designed cluster development community, with more preserved open space would be a potential asset for Whitemarsh.

Erdenheim Farm. While only a part of this proposal, we are concerned about the fate of the rest of the farm that hasn't been donated to the Natural Lands Trust. All too often, large land holdings of this type are lost incrementally, a few acres at a time. We suggest that a dialogue begin between the township and the owner regarding the future of the rest of the farm. If requested, we would be willing to assist in this

Proposed Ordinance. We have the following concerns regarding the language of the proposed ordinance.

- Definition: Continuing Care Retirement Community (CCRC)

While defined as such in the Ordinance, this definition does not match the one created by the Commonwealth. The applicant's definition ignores the Commonwealth's criteria for guaranteeing an individual with continuing care the rest of an individual's life or for a period in excess of one year. Typically, as defined by the Commonwealth, an individual pays an entrance fee, enters into a mutually terminable contract and is provided health care for a period of time – usually the remainder of the individual's life. The applicant's definition provides none of this. We note this because the name of the district is somewhat misleading.

Also it should be noted that the applicant's definition states that CCRC communities *may* include independent living units, assisted living facilities and skilled nursing care beds, but doesn't require them. However the use regulations *require* them. Why is there this discrepancy? Also if this ordinance is adopted, we would recommend that independent living units, assisted living facilities, and skilled nursing care be individually defined in the Zoning Ordinance.

- Use Regulation

We recommend that CCRC communities not be allowed by right, but rather by conditional use. This would require a public hearing before the Board of Supervisors and give them the opportunity to place additional restrictions or conditions upon a project that aren't specifically covered in the Zoning or Subdivision Ordinance. Given the impact this district could have on an area, the ability to place additional conditions on these developments could prove beneficial.

- Property Line Setback

We would recommend that the setback from existing residential lots for all dwelling types be increased to 100 ft. Some of the dwellings are allowed to be only 75 ft. from such lots. By moving all setbacks to 100 ft., a larger more dense level buffer could be created. For this project in particular, more of the woodlands that screen the site from the adjacent neighborhood could be saved.

- Density

As we have already stated, we believe that the proposed 4 du's to the acre is too dense. We would recommend about 2 du's, which is still double that of the existing zoning. Perhaps a density bonus could also be added if more open space is preserved.

- Minimum Open Space

Under this Ordinance, 20% of the tract must be preserved as open space. Under the Township's Cluster Regulations, which would apply to this tract, at least 40% must be preserved as open space. If the township approve this district we suggest a percentage closer to 40% be used.

- Breakdown between Independent, Assisted Living, and Skilled Nursing Care

This regulation states that the number of assisted and skilled care beds can't exceed 30% of the total number of independent living units. This is the reverse of most Ordinances and will create primarily an Independent Living Community.

- We recommend the following regulations are added to this Ordinance

- Setback for Accessory Buildings. There needs to be a property line setback added for these structures. We suggest 100 ft. from any existing residential lot or Public Road Ultimate ROW. 50 ft. from any other property line.
- Screening for Loading/Trash Facility. Standards ensuring that these facilities are properly screened from the view of CCRC and adjacent residents should be added to this district.
- Lighting. Standards ensuring that any lighting within a CCRC development won't have a negative impact on adjacent properties need to be added.
- Architectural Standards. Standards need to be devised to prevent the creation of large, monolithic structures. In particular we are concerned about the multiple dwellings which can be as high as 45 ft. or 4 stories. Standards that break up the appearance of these buildings by regulating horizontal wall length and requiring architectural features such as bay windows, vertical and horizontal setbacks, pitched roofs with dormers, etc. should be required to guarantee that these structures have a residential rather than institutional appearance. Also any building of this height should have increased landscaping to mitigate its impact on adjacent properties.
- Viewshed Analysis. A requirement for a viewshed analysis should be added to this district. This would provide information in the form of profile drawings, showing the impact of the development on neighboring properties. This requirement should be placed on any building over two stories in height.

Submitted Sketch Plan. We have the following comments regarding the submitted Sketch Plan.

- Access Drive Location

According to the township's traffic study, extensive road improvements such as turning lanes and a signal, would be required if the proposed access drive remains at the intersection of Thomas and Flourtown. If moved to Thomas Road, in a location near the present entrance, no improvements would be required. While we realize that there might be some sight distance problems along Thomas Road as it relates to this site, we recommend that the access drive be placed along Thomas Road and any necessary safety improvements be made.

- Rear Retention Pond

The creation of this pond will remove lot of the woods which could be used to buffer the development from properties on Kottler Drive. We suggest either moving the pond or changing it to a naturalized, landscaped basin to provide screening for adjacent properties.

- Multiple Dwelling Buildings

In its proposed location, we feel that it could really overwhelm the adjacent residences, especially those on Presidential Drive. Every effort should be made to mitigate this impact. Limiting its size, the use of architectural detailing to provide a residential appearance, increased landscaping and setbacks should all be considered.

- Alternative Sketch Plan *(Editor's note: You will find the County's alternative sketch plan at the end of this document. The developer's sketch plan can be found in the Document Links section of the Erdenheim Farm Development page.)*

We have prepared an alternate Sketch Plan for this development. While retaining the districts proposed density, but encroaching upon more of the farms rear pasture area, we achieved the following:

- Moved the proposed entrance drive to its existing location and preserved some of the existing hedge row visible from Flourtown Road.
- Moved the multiple dwelling farther from the existing neighborhood and placed it as a focal point for the main access drive.
- Kept a 100 ft. buffer along the site's perimeter with the existing neighborhood and Whitemarsh Valley County Club.

We offer this Sketch as example of retaining the proposed density, while decreasing the impact on the adjacent neighborhood and preserving more of the existing woods. We do realize that its implementation would require obtaining more property from the Dixon family. Overall, however, we reiterate our concern that the proposed density is too high and that more open space should be preserved as part of any development scenario at this site.

#### Additional Comments

- Stormwater Drainage

Many of the adjacent properties have trouble with stormwater runoff from the farm. Any development on this site should be designed to alleviate this problem.

- Intersection of Thomas and Flourtown Road

Eventually this intersection should be redesigned to provide better movement along Flourtown Road – which carries the majority of the traffic. The curve should be softened and Thomas Road relocated to "T" into Flourtown Road. The township should begin to plan for this upgrade.

### **RECOMMENDATION**

While we like this concept, we are concerned about the proposed density and low amount of preserved open space. We recommend that the township and applicant work to resolve these in a reasonable manner. We also think if the township is agreeable to this proposal, that our recommended additional regulations be added to the district, along with any others that the township deems appropriate.

Please note that the review comments and recommendations contained in this report are advisory to the municipality and the 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 this 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.

Should the governing body adopt this proposed Zoning Ordinance Text/Map Amendment Section 609 of the Municipalities Planning Code requires that we be sent an official copy within 30 days.

Sincerely,



Nels Sandberg  
Principal Planner

NS/jlj

c: Whitemarsh Retirement Partners, LLC, Applicant  
William F. O'Donnell, Chairman, Township Planning Commission  
Lawrence J. Gregan, Township Manager  
Ross Weiss, Esq., Township Solicitor  
Thomas F. Zarko, PE, Township Engineer

Attachment

