APPLICATION TO THE ZONING HEARING BOARD OF LOWER MERION TOWNSHIP OF THE FRENCH INTERNATIONAL SCHOOL FOR THE DEVELOPMENT OF ITS UPPER SCHOOL, LOCATED AT 23 WEST CITY AVENUE, INCLUDING THE ADJACENT 6 BALA AVENUE

Pursuant to Chapter 155 "Zoning" of the Code of the Township of Lower Merion ("Code") section 155-107 "Appeals and Applications," The French International School ("Applicant"), files this application:

1. Applicant's contact information is:

   (a) Kathy Kotchick
   Head of School
   French International School of Philadelphia
   150 Highland Avenue
   Bala Cynwyd, PA 19004
   (610) 667-1284
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   (b) Deborah R. Willig, Esquire
   c/o French International School of Philadelphia
   150 Highland Avenue
   Bala Cynwyd, PA 19004
   (215) 656-3666
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2. Applicant is a co-educational school for Pre-K through 8th grades that has been in existence in Lower Merion Township since 1991 at various locations. It currently has two locations. Pre-K through 3rd grades are located at 150 Highland Avenue, in Bala Cynwyd, and 4th through 8th grades are located at 23 West City Avenue, also in Bala Cynwyd.

3. Applicant is the equitable owner of the property located at 6 Bala Avenue, which is adjacent to Applicant's City Avenue property. Applicant files this Application in anticipation of consolidating its City Avenue property with 6 Bala Avenue (the "Property").

4. At City Avenue, Applicant currently has a total of 107 students and 8 full-time and 5 part-time faculty/staff. Zoning Officer, Michael Wylie, issued a Change of Use Certificate, dated March 2, 2006 for 150 students,11 staff members and 40 seat assembly space. Applicants proposed plan anticipates not exceeding 175 students, 18 staff members and 85 seat assembly.

5. The Upper School on City Avenue has a school day that lasts from 8:15 a.m. to 3:15 p.m. (depending on grade), as well as before (7:30 a.m. to 8:00 a.m.) and after school care (3:00 p.m. to 6:00 p.m.). The school day will be the same at the consolidated property.

6. 6 Bala Avenue is located in the R-6A and R-4 Residential Zoning Districts. The City Avenue property is located in the City Avenue District – Bala Village ("CAD-BV").

7. Applicant's proposed plan for the Property includes:

(a) The construction of a new detached one-story 5,840 square foot school building;

(b) The construction of a 350 square foot addition to the existing two-story residence on 6 Bala Avenue to house an elevator and egress stairs for building code compliance;

(c) The addition of a half-court basketball area, table tennis courts and back to back benches for spectators. The relocation of 25 parking spaces, including two ADA parking spaces;

(d) A new two-way driveway off of Bala Avenue which connects with the existing driveway that will be one-way in from City Avenue; and,

(e) The existing Class 2 historic building will remain.

8. USE.

Zoning Officer Michael Wylie confirmed that the educational use at the City Avenue property is permitted under §155-219.B(3)(2).

Applicant respectfully requests a special exception pursuant to section 155-11S(2) as an "Accredited Educational Institutional" for the portion of the Property located at 6 Bala Avenue. Applicant satisfies or will satisfy the following requirements of section 155-11Y:

(a) Subsection (1) by providing a traffic study;

(b) Subsection (2) by providing the data quantifying the intensity of the proposed use;

(c) Subsection (3) not applicable.

(d) Subsection (4) by providing required loading/queuing;

(e) Subsection (5) by providing lighting that is compliant with the Code;

(f) Subsection (6) by providing the buffering subject to the relief requested in this Application; and,

(g) Subsection (7) by satisfying the impervious surface and storm water requirements of the Code.

Applicant requests confirmation that the parking required by the CAD-BV use at City Avenue is permitted at 6 Bala Avenue as part of its Special Exceptions.

9. PARKING.

(a) In 2006, the change of use certificate determined 25 spaces were required for the use per 155-95.AA.

(b) The Adoption of the CAD-BV in 2014 did not include a specific institutional parking standard in Table 6. Thus, the 'other' category of 4 per 1,000 sf applied.

(c) An Interpretation or in the alternative a Variance: To permit the Applicant to utilize the more specific standards of 155-95.AA in lieu of the generic standard of Table 6 as referenced from 155-219.D. (referencing 115-117.D(2)).

(d) Waiver or, in the alternative, Special Exception: 155-95.AA.(4) To waive 50% of the required parking under 155-95.AA(1). Using the formula, Applicant is required to provide 42 parking spaces and proposes 25. When there is an event in the assembly space, the school works with surrounding commercial owners for parking. In addition, the international community (teachers, parents) takes a higher percentage of public transit then other schools). In the alternative, applicant requests to hold the additional 17 parking spaces in reserve pursuant to 155-95.1.

10. BUFFER.

(a) A 20' buffer is provided along the north side and rear property lines of 6 Bala Avenue. These areas abut residential uses. Applicant calculated the buffer based on the building area within the R-6A zone. The CAD-BV does not have a buffer requirement, only R-6A.

(b) 155-11.Y.(6)(c) Waiver, or, in the alternative, Variance: To not provide a buffer, as required by 155-11.Y(6)(a) and 155-114.(D)(2) along the adjacent commercial properties.

(c) Variance: 155-11Y(6) and/or 155-114(D)(2) to allow the existing projection, into the required buffer, of a bay window on the existing dwelling at 6 Bala Avenue.

11. LOADING AND QUEUING:

If required, a variance from section 155-11Y(4) to allow the bus and car drop-off and pick-up in a portion of the Property in CAD-BV.

12. BOUNDARY TOLERANCE:

As a result of 6 Bala Avenue being split zoned between R-6A and R-4, there is a 1% difference in the allowed impervious coverage. Applicant requests a boundary tolerance under section 155-8A to permit a 100' extension of the R-6A district.

13. Previous Zoning Appeals: none.

14. Applicant's Exhibits include:

(a) April 15, 2019 Agreement of Sale;

(b) Applicant's Educational Certificates;

(c) Zoning Officer Michael Wylie's Change of Use Certificate dated March 2, 2006;

(d) Photos of Existing Class 2 Building at 6 Bala Avenue;

(e) Cover Sheet;

(f) Conservation Inventory and Lot Merger Plan;

(g) Demolition Plan;

(h) Proposed Plan;

(i) Reserve Parking Plan;

(j) Vehicle Queue Plan;

(k) Architectural Program Plan;

(l) Landscaping Plan;

(m) Site Lighting Plan;

(n) Photometric Plan;

(o) Traffic Impact Study submitted by McMahon Associates, Inc.

15. Applicant's witnesses could include, but not be limited to, a representative of Applicant, its civil engineer, architect, traffic engineer, landscape architect, lighting engineer, planner and/or appraiser.

16. Applicant estimates that it will take 3 hours to present its case to the Zoning Hearing Board.

Respectfully submitted

COZEN O'CONNOR

By: _____
Ross Weiss, Esquire
Attorney for The French International School