

December 13, 2011

Mr. Michael Wylie  
Building & Planning Department  
Lower Merion Township  
Building Regulations & Zoning  
75 E. Lancaster Avenue  
Ardmore, PA 19003

Marc H. Jaffe\*  
Fred B. Fromhold  
David R. Adamst  
Matthew D. Gilbert  
Ji Min Jun

\*LLM in Taxation  
†Also admitted in New Jersey

RE: 480 N. Latches Lane, Merion Station – Zoning Application  
Our File: 3783.009

Dear Mr. Wylie:

Please find enclosed a Zoning Application we are filing on behalf of Saint Joseph's University. The University received approval from the Zoning Hearing Board in Appeal No. 4011 (2006) to use its property at 480 N. Latches Lane ("Maguire Campus") for its accredited educational institution use. The University now seeks special exception approval under Code §§ 155-11 S(2) and 155-11 X to use Windrim Hall for administrative offices. This special exception is being sought without prejudice to or waiver of the University's position that the previous 2006 order of the Zoning Hearing Board permits the proposed administrative use of Windrim Hall without need for any additional special exception approval.

Included with this Application is the Record Plan prepared by Momenee & Associates, Inc. which received Preliminary Land Development Plan approval on March 23, 2011 and recorded on July 12, 2011 as well as a check made payable to Lower Merion Township in the amount of \$1,010, the required application fee.

Please schedule this matter for the next available hearing before the Zoning Hearing Board, which we understand is January 5<sup>th</sup>. Please call if you have any questions or require additional information.

Sincerely,



FRED B. FROMHOLD

**RECEIVED**

DEC 13 2011

**BUILDING DIVISION  
LOWER MERION TOWNSHIP**

cc: Saint Joseph's University

N:\Documents\3783\009\Ltr. to M. Wylie [Zoning Application].doc

**BEFORE THE ZONING HEARING BOARD OF  
LOWER MERION TOWNSHIP, MONTGOMERY COUNTY, PENNSYLVANIA**

<b>IN THE MATTER OF:</b>	:	<b>PROPERTY:</b>
	:	
<b>SAINT JOSEPH'S UNIVERSITY</b>	:	<b>480 N. LATCHES LANE</b>
	:	<b>MERION STATION, PA 19066</b>

---

**ZONING APPLICATION**

---

Saint Joseph's University, by its attorneys, Fromhold Jaffe & Adams, files this application and states:

1. **Name and Address of Applicant.**

Applicant is Saint Joseph's University (the "University"), c/o Mr. Kevin Robinson, Vice President of Administrative Services, 5600 City Avenue, Philadelphia, PA 19010.

2. **Name and Address of Owner of Premises.**

The University owns the premises at 480 N. Latches Lane, Merion Station ("Maguire Campus") which is the subject of this Zoning Application.

3. **Description and Location of Real Estate to be Affected.**

The real estate to be affected by this application is known as Windrim Hall, a building located on the Maguire Campus and fronting on Latches Lane. The Maguire Campus comprises approximately 34 acres with frontages on City Avenue to the southeast, Berwick Road and Raynham Road to the southwest, N. Latches Lane to the northwest and Lapsley Lane to the northeast.

4. **Present Zoning Classification, Improvements and Use.**

The Maguire Campus is located in the R AA and R A Residence Districts and improved with various academic and administrative buildings, playing fields, and driveways and parking areas for the University's accredited educational institution use. These improvements, including Windrim Hall, are depicted on the attached Record Plan prepared by Momenee & Associates, Inc. which received Preliminary Land Development Plan approval on March 23, 2011 and was recorded on July 12, 2011.

5. **Sections of the Code Under Which Relief is Requested.**

The University seeks special exception approval under Code §§ 155-11 S (2) and 155-11 X to use Windrim Hall for administrative offices. This special exception is being sought without prejudice to or waiver of the University's position that the order of the Zoning Hearing Board ("the Board") in Appeal No. 4011 (2006), which permits the University to use the Maguire Campus for its accredited educational institution use, currently permits the proposed use of Windrim Hall without need for any additional special exception approval.

6. **Relief Requested/Reasons for Granting Approval.**

In Appeal No. 4011, the University obtained the Board's approval to use the Maguire Campus for the University's accredited educational institution use. At that time, the University provided testimony that it would use Dupperault Hall (formerly Ryan Hall) and the carriage house immediately to the south of that building to spatially accommodate its administrative offices at the Maguire Campus and that Windrim Hall, located immediately to the west of Dupperault Hall, would continue to be used as a residence. To more comfortably accommodate its administrative office needs, the University now proposes to use Windrim Hall for administrative offices as well and seeks a special exception under Code § 155-115(2) and 155-11x for specific authorization of such use.

With this use of Windrim Hall, the University will remain within the projected number of faculty, staff, and students approved for occupancy of the Maguire Campus in Appeal No. 4011. The University anticipates that Windrim Hall will be occupied by approximately 13 persons, principally between the hours of 8 a.m. and 6 p.m., who will park their vehicles in the gated parking lot to the west of Windrim Hall. The area devoted to administrative offices will

not exceed 10% of the habitable floor area of the principal buildings on the Maguire Campus. The proposed use will have no adverse impact on the public health, safety, or welfare.

7. Witnesses.

SJU expects to offer testimony from approximately 1 or 2 witnesses whose direct testimony is expected to last approximately 20 minutes.

Respectfully submitted,

FROMHOLD JAFFE & ADAMS

By:   
FRED B. FROMHOLD  
Attorney for Applicant

Date: December 13, 2011

