



WHITPAIN TOWNSHIP
MONTGOMERY COUNTY
COMMONWEALTH OF PENNSYLVANIA

OFFICE OF THE SUPERVISORS

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July 21, 2005

Mr. Rocco Wack, Acting Borough Manager
Ambler Borough
122 East Butler Avenue
Ambler, PA 19002-4476

Re: Proposed Amendment to the Ambler Comprehensive Plan

Dear Mr. Wack:

Pursuant to your letter of July 1, 2005 concerning the amendment of the Amber Borough Comprehensive Plan, as a contiguous municipality to Amber, Whitpain Township Board of Supervisors urges the Ambler Council **not** to adopt the proposed amendment to its Comprehensive Plan as outlined in your letter. As Whitpain Township understands the proposed amendment to the Ambler Borough Comprehensive Plan, the amendment will change the language of the Plan to read as follows:

"High density residential (HDR) is shown where existing apartment complexes are located and for an undeveloped area north of Butler Avenue between Maple Avenue and the Upper Dublin Township border. Multi-family development (apartments) at a density between 60 and 70 units per acre is proposed"

Your letter indicates that Ambler Borough Council intends to consider the adoption of the Comprehensive Plan as above described, when it also considers an amendment to the Zoning Ordinance of the Borough which will permit the implementation of the Kane Core Development Company proposal. On March 18, 2005 Whitpain Township wrote to Council (see copy of our prior letter attached) urging Council to defer the adoption of a zoning ordinance amendment which would permit the construction of a 17-story structure containing 381 residential units and underground parking until the regional concerns of such a massive project and the impact upon the communities of Ambler, Whitmarsh, Upper Dublin and Whitpain could be ascertained and plans made to accommodate those pressures. We are unaware of any analysis of those issues by the Council or the Borough Planning Commission at this time. Certainly, no efforts have been made to share either the analysis of those concerns or the resolution of any of them.

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A review of Chapter III of the Municipalities Planning Code (hereinafter “MPC”) indicates what should be included in a Comprehensive Plan. The provision §301(d) of the MPC urge a municipality to identify those areas where growth and development will occur

“..so that the full range of public infrastructure services, including sewer, water, highways, police and fire protection, public schools, parks, open space and other services can be adequately planned and provided as needed to accommodate growth”.

Further, in §301.2 of the MPC, concerning the preparation of a comprehensive plan, municipalities are directed have their planning agencies (Ambler Planning Commission) to

“..make careful surveys, studies and analyses of housing, demographics, and economic characteristics and trend; amount, type and general location and interrelationship of different categories of land use; general location and extent of transportation and community facilities; natural features affecting development; natural, historic and cultural resources; and the prospects of future growth in the municipality”.

When contemplating an amendment to a comprehensive plan, especially one of this magnitude (an increase in density with the high density residential district of approximately 300%), we believe that the same studies should be undertaken by the planning agency of the Borough before the consideration to adopt such an amendment. Whitpain Township is unaware that any such studies have been undertaken by the Ambler Planning Commission or any consultants engaged on its behalf. If such studies have been made and they support such a change in the density of high-density residential use within the Borough, then we have not been made aware of them and the same has not been shared with Whitpain Township.

Whitpain Township Board of Supervisors renews its opposition to the adoption of either the proposed amendment to the Ambler Borough Comprehensive Plan or the proposed amendment to the Zoning Ordinance. In our letter of March 18, 2005 addressed to Council we set forth multiple concerns about the project and its regional effects upon not only Ambler Borough, but also upon Whitmarsh Township, Whitpain Township and Upper Dublin Township, as follows:


- 1) traffic impact on regional roads
- 2) building height
- 3) environmental impacts on the floodway
- 4) sanitary sewer impacts
- 5) fire and safety concerns

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Thereafter, in our correspondence we recited the specifics of those concerns. There would be no purpose in setting for the details of these concerns in this correspondence. These items still have not been addressed. No studies have been done, or if completed by anyone, have not been provided to Whitpain Township to allay its concerns.

In light of the foregoing, we would urge the Council not to adopt the Comprehensive Plan amendment and not to adopt the Zoning Ordinance amendment that would permit the construction of a 17-story project on the property located on the undeveloped area north of Butler Avenue, between Maple Avenue and the Upper Dublin border.

Very truly yours,


Phyllis C. Lieberman
Whitpain Township Manager

c: Upper Dublin Township
Whitemarsh Township