

Analysis of the Draft of the Whitemarsh Township Comprehensive Plan

**Prepared by
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As the summer of 2001 draws to an end, the Whitemarsh Township Residents Association (WTRA) passes the first anniversary of its formation. During this first year, the WTRA was actively involved in responding to several development proposals submitted to the Township. These proposals cited elements of the draft Whitemarsh Township Comprehensive Plan (CP) as providing the justification or rationale for the Township's approval.

Because of deficiencies that this analysis hopes to make clear, the WTRA feels that the current draft of the CP is not yet an effective resource for guiding decisions about development in our Township. Specifically, improvements need to be made in the following areas before it can be considered a document that is truly representative of and sufficiently strong to enforce the will of the community: (1) the document overall needs greater specificity, (2) it needs to articulate how proposed goals will be implemented, and (3) it needs to incorporate the principles of open space and smart growth.

Part of the document's inherent weakness lies in its adherence to an antiquated paradigm -- that future prosperity hinges on development. The focus of the CP needs to be redirected to reflect the true needs and desires of the community -- for open space planning and protection against suburban sprawl.

The original CP, from which the current draft derives, was considered "an ambitious document that is a reflection of a time when the answer to current woes was new construction that was bigger and therefore better." However, as articulated by the WTRA in its *Policy Brief: A Comprehensive Plan and Legislative Agenda for Supporting Smart Growth and Open Space Preservation in Whitemarsh Township*, times have changed. Bigger and better construction is not the answer to the dilemma of proper planning for Whitemarsh. In an era where suburban sprawl is infiltrating and permanently destroying valuable Pennsylvania countryside, it is of paramount

importance that this municipality redirect its focus and emphasize the importance of smart growth and open space preservation.

The following summarizes the WTRA's primary concerns with the draft CP. With cooperative interaction among itself, the Board of Supervisors, the Planning Commission, and other community members, the CP's regulations and language can be improved to provide Whitemarsh with a planning document that effectively advances this community's vision for its future.

ANALYSIS OF THE COMPREHENSIVE PLAN

The following is a brief summary of important chapters within the CP focusing on the regulations and language that the WTRA finds troubling because of an obvious weight toward development and away from open space preservation. Where possible, strategic recommendations have been proffered.

Chapter 3: Natural Features

The ten maps in Chapter 3 effectively inventory the Township's natural resources [excluding wetland buffers] but fail to map, in a correlated fashion, the areas *least* desirable for new development. Further, these maps do nothing to delineate the prime open space conservation areas but instead seem to have been created for the purpose of showing which areas are well suited for future development.

A logical addition to Chapter 3 would be a map of ***Potential Conservation Lands***. On such a map, wetlands, floodplains, slopes exceeding 25%, mature woodlands, wildlife habitats and travel corridors, prime farmland, groundwater recharge areas, greenways and trails, river and stream corridors, historic sites and buildings, and scenic viewsheds would be recorded together. This important tool would help guide all decisions tied to future development and protect the important natural resources that contribute to the uniqueness of Whitemarsh Township.

In understanding that part of the quality of life in Whitemarsh is found in the physical beauty of its open landscapes and their related natural features, mapping and conservation of such features should be a new consideration in the face of all development proposals and should be effectively incorporated into the CP. Such an inventory process could be executed under the guidance of field professionals such as those at the Natural Lands Trust or the Brandywine Conservancy.

Chapter 4: Demographics

The demographic studies in Chapter 4 suggest a pattern of continued growth in Whitemarsh Township. The findings indicate that a new part of that growth is due to the senior sector of society that is living to an older age. However, nothing in these studies accounts for the decline that will later occur when this aging population begins to die off. Therefore, these studies bolster an argument for the need to accommodate a

larger senior population with new development but fail to accurately forecast the surplus in housing following the ultimate demise of the elderly or address other opportunities that are available to those living longer lives. Consequently, the information is weighted in favor of development and fails to justify the sacrifice of open space as a population growth accommodation.

Chapter 6: Goals & Objectives

Land Use:

The stated Land Use goal in Chapter 6 is to promote an orderly pattern of land use that balances the need to utilize land for development with the need to preserve land for recreational and environmental needs. The Plan sets out to create a land use pattern that promotes what the WTRA acknowledges as true quality of life concerns: (1) harmony between residential and non-residential uses; (2) providing for local shopping and employment opportunities; (3) preserving open space and significant natural features; and (4) coordinating development with infrastructure improvements.

Though seemingly ideal, this set of goals is structured for a new and growing community that is inaugurating an original system of well-balanced considerations. However, Whitmarsh Township is *not* a new community. While the Township must allow for the legally permissible growth percentages per year or cycle, the Plan's focus is on growth and development that are extensions of the antiquated growth patterns that have flourished since the 1950s and 60s. According to the principles set forth in the Plan, the Township intends to continue with the pattern that has brought us to today and, in consideration of open space preservation, this is unnecessarily dangerous.

A revised development pattern must be adopted that balances whatever the *true* development needs of the community are with a much-overlooked interest in preserving irreplaceable open space. Doing so would create the missing balance among the quality of life concerns set forth later in this document.

Land Use Specific Objectives:

At a time when density is of such paramount concern in Whitemarsh Township, reference within this section of this chapter to “high-density residential and commercial development within the available infrastructure” demands attention. The CP must clarify what constitutes an “available infrastructure” and an “established area.” It is also important to determine how these locations are to be identified, surveyed, documented and classified. More importantly, in planning the future of this mature community that values open space as an important part of its quality of life, it is of extreme importance to question why “high density development” is a land use category that should even be permitted.

In considering the use of buffer zones as development screens, the CP must indicate under what circumstances, if any, such buffers can be waived. In addition, the creation of buffer zones should be done with strict compliance to environmental and design standards.

The CP must include a definition of “residential cluster zoning.” Since clusters are associated with high-density housing arrangements, perhaps they should only be permitted as part of a Conservation Design Plan where such clusters take up only a small percent of lots that will otherwise remain as open space.

Economic Development & Commerce:

The stated Economic Development & Commerce goal is to provide for a strong and diverse economic base within the Township by promoting commercial, office/industrial, and small-scale business campus development to supplement the community’s commercial needs, create jobs and broaden the community’s tax base. Whitemarsh Township is an established, economically mature community, and the WTRA fails to see how the community’s economic base is *not* strong and diverse or how this chapter’s focus on needed development and employment can be justified. For example, the WTRA believes there needs to be some justification for why the Township should be pursuing development when the statistics contained within the Plan show that Whitemarsh is already a wealthy community facing nothing but anticipated growth. Aside from neighborhood corner stores -- which are an innovation of a bygone era -- we would like to know what Whitemarsh Township commerce *doesn’t* offer to the community that would otherwise justify more commercial development, especially

when considering the numerous commercial and business districts developing in other neighboring townships. If, in fact, the economic base of Whitemarsh is threatened or in decline, the community needs to be shown that more business and commercial development is required and that those needs justify a missing focus on preserving open space.

Natural & Historic Resources:

The stated Natural & Historic Resources goal is to promote the preservation and enhancement of significant natural and cultural resources to maintain the Township's "sense of place." The Plan purportedly sets out to preserve these resources because they help to distinguish the Township and mark its history and quality of life. However, the CP fails to define quality of life and does not specifically identify the Township's natural or cultural resources. For reasons that far exceed merely giving community residents a "sense of place," these resources should be clearly identified, mapped, and preserved because of their historic significance.

Such physical resources are also of great importance because they contribute to the quality of life that has been defined by the WTRA elsewhere in this document. In addition to the community's enjoyment of these resources and what they do to enhance living in Whitemarsh, these are important legacies that survive today and as stewards of Whitemarsh Township, it is our responsibility to properly care for and protect them.

Designation of an historic property, landscape, archaeological site, or district can easily be pursued through the National Register of Historic Preservation process and the Secretary of Interior Standards for Historic Preservation. Working with the appropriate governmental agency would help facilitate such designations and serve to protect the Township's historic resources. In so doing, small pockets of historically significant open space would be protected if the appropriate standards were satisfied.

Conservation Easements are one of easiest and most effective ways for a private landowner to preserve open space. Under the direction a land use attorney or reputable land trust, such as the Brandywine Conservancy, Natural Lands Trust, or Montgomery County Lands Trust, the Township can pursue public-awareness programs

to promote open space partnerships that benefit both the community and private landowners.

Housing:

The stated Housing goal is to encourage the complete range of housing types to meet the needs of the Township within established development patterns and to protect the value of the existing housing stock. The Plan promotes an inventory of marketable “infill” housing types that are to be developed in appropriate locations. The focus here, again, is on more development, more housing, and more housing types – as based on population studies that indicate that Whitemarsh is going to keep expanding until 2020. However, Whitemarsh is only going to expand as far as housing will permit.

The CP should set forth a process by which all of the community’s open space is to be inventoried to help determine what is to be preserved and what left over. Rather than focus on “fill-in” housing that will be tucked into every empty nook in the Township, the CP should shift its focus to preserving as many open nooks and open spaces as possible, while working with the housing type minimums required by law.

As a creative alternative to the excessive development that would undermine the existing quality of life, Whitemarsh could inaugurate the kind of Cooperative Planning that was explained to the Board of Supervisors by the Montgomery County Planning Commission earlier this spring. In such a program, Whitemarsh could partner with an adjacent township and work within combined boundaries to collectively assess how many building types and uses have been satisfied, and allow one township to compensate for the other’s deficiencies – and vice versa.

Chapter 7: Proposed Land Use Plan

The Land Use Plan in Chapter 7 is *set forth* as the barometer upon which the Township measures the need for future growth and development. While this Plan is introduced as the primary defense mechanism for stalling or defeating unwanted zoning or conflicting land uses, it simultaneously invites commercial development, light industry, and the construction of business campuses because of the “healthy demand” for such land use. This presents a self-contradiction. Again, the WTRA wants to know from what source this demand is substantiated in 2001 and how the CP will be utilized to stall development projects that are in conflict. In the face of several major current developments today, the WTRA wonders how the CP can be utilized to delay the development process until equal consideration is given to open space and the wants of developers.

Chapter 7 separates out the six primary land uses in Whitemarsh Township. Other than identifying Erdenheim Farm and the Township’s five golf courses as sites that should be considered for “Open Space Preservation” no plan for open space conservation is set forth as part of the Land Use Plan – which *does* map out the different locations for development/commercial land uses. The issue of open space preservation requires further research, surveying, mapping and regulatory guidance.

To this end, those involved with the planning should consider the programs being administered by the Pennsylvania Environmental Council or Natural Lands Trust that help guide municipal planning and township growth with an special interest in open space preservation.

QUALITY OF LIFE DEFINED

The CP is and should be driven by an overarching interest in the future of this historic farming village and the “quality of life” that both residents and workers cherish in their daily lives. However, nowhere in the tenets of the CP is quality of life defined. Rather, quality of life is sporadically referenced throughout the CP to enhance the arguments for ‘much-needed’ development. The proposed paradigm shift for the CP must begin with a primary understanding of what constitutes “quality of life” in Whitemarsh Township in the 21st century – where development is no longer the guiding force.

In its simplest form, quality of life is a term used to encompass the many features within Whitemarsh Township that make it a desirable place to reside, raise a family, work, and recreate. First, quality of life is reflected in the physical attributes within the community. This includes all visible aspects of the natural, planted, and built environments. In Whitemarsh, there is fantastic appeal in the proximity of open farmland and rolling hillsides to the network of neighborhoods and commercial districts. The people of Whitemarsh have chosen this over other communities because of what they see every time they open their doors, walk along the sidewalks and in open spaces, or drive in their cars. The beautiful setting of this charming suburban community adds exceptional quality to living and working in Whitemarsh Township and offers a wonderful alternative to city living or life in less desirable communities.

As a parallel to the physical beauty that enhances the quality of life in Whitemarsh Township is the predominant absence of suburban sprawl. With the exception of several development projects that have emerged during the past several years, the basic framework of this charming community remains intact and still relatively free of the scars and stresses from unmonitored development. This critical quality of life feature in Whitemarsh Township is of exceptional value and demands careful consideration and preservation in the planning process.

Choices about what community to live in are also influenced by how well a community cares for its residents – as property owners, family people, aging citizens, and workers. In this vein, good quality of life is enhanced in Whitemarsh Township because of the safety and security afforded by strong public and emergency services. Whitemarsh is clean, safe, environmentally responsible and has good water and sewer services. Further, Whitemarsh Township offers excellent public and private education opportunities to children and adults and prides itself on a growing library system. For those who choose to live out their senior years in Whitemarsh, there are a variety of housing and senior care alternatives that can accommodate their needs. Consequently, Whitemarsh is an ideal location for safely raising and educating a family, keeping a home, going to business, and retiring.

Quality of life also encompasses community interests as well. Whitemarsh gives its residents many opportunities to worship together, interact at public facilities and private clubs, and partake of its commercial and recreational offerings. The Township

boasts a wide selection of small retail stores, shopping centers, restaurants, and businesses that service most facets of personal and professional life. The Township has its own parks and recreational facilities and has access to others just beyond the Township limits. As a complement to the abundance of amenities within this Township, Whitemarsh residents also have easy access to the communities of Chestnut Hill, the Main Line, and downtown Philadelphia, making itself the perfect neighbor.

Quality of life is also defined by the economic viability of the community. Demographic studies show that Whitemarsh is one of the three wealthiest communities in Eastern Montgomery County. Therefore, to invest in a home or business in Whitemarsh is currently a sound investment. As insurance that such an investment is and will remain wise, there is security in knowing that the character of this unique and charming community will remain unchanged.

Quality of life is therefore a multi-faceted concept that is delineated by the wants of those who become community members and the attributes within the community that attract them. With regard to the drafting and adoption of a Comprehensive Plan for Whitemarsh Township, the community is at a critical threshold. Given the forces arraying to consume what remains of our open space, the current draft Plan as conceived, will not be strong enough to protect the quality of life that we currently enjoy. However, with intelligent planning and comprehensive self-evaluation, the CP could provide the vision and enforceable standards that will preserve and even enhance the quality of life that epitomizes Whitemarsh Township.

SUMMARY

The WTRA acknowledges that a great deal of time and energy has been spent on the drafting and redrafting of the CP and that it is largely based on a document that was used by the Township for several decades. The CP is a valuable and critical planning tool that must be strengthened and shaped to reflect the community's current wants and needs. In the past several decades, Whitemarsh has grown and changed for the better, and it is imperative that this planning document not only reflect those changes but ensure that these trends continue.

The Whitemarsh Township of 2001 is very different from the Whitemarsh Township of the 1950s or 60s. At that time, it was one of many suburban farming communities on

the brink of change and modern development. Although certain farmsteads and nurseries were ultimately replaced with residential neighborhoods, Whitemarsh has managed to maintain much of its original character when many adjacent communities have smothered that charm with excessive building. Therefore, Whitemarsh is exceedingly valuable because of what it is – a unique suburban community with a high quality of life – and for what it is not – a community destroyed by suburban sprawl. Consequently, the time has come for Township planners to take stock in what is important to the community members of Whitemarsh Township and address it head on in the Comprehensive Plan and supporting documents.

The observations and recommendations set forth above are the result of an analysis of the CP conducted by the WTRA. We hope that sharing these comments will be the first of many opportunities for the WTRA to work proactively with the Planning Commission, the Board of Supervisors, the Montgomery Planning Commission, and other Whitemarsh representatives in helping to produce a planning document that truly represents the community's needs, future goals, and realistic considerations of how we can continue to thrive as one of Eastern Montgomery County's most successful townships.