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SCOTT FRANCE, AICP
EXECUTIVE DIRECTOR

November 17, 2025

Ms. Riley McGrath, Zoning Officer & Planning Coordinator
Upper Dublin Township
370 Commerce Drive
Fort Washington, Pennsylvania 19034

Re: MCPC #24-0146-003
Plan Name: Conditional Use Application for Promenade East at Upper Dublin
Upper Dublin Township

Dear Ms. McGrath:

We have reviewed the above-referenced Conditional Use as you requested on October 17, 2025. We forward this letter as a report of our review.

BACKGROUND

The applicant, BET Investments, is applying for Conditional Use approval for the "Promenade East at Upper Dublin" project located on the former Prudential property. The project consists of the proposed redevelopment of the property as a mixed-use development consisting of a mix of commercial, office, and residential uses. The existing three-story parking garage and 230,000-square foot office building in the northern portion of the property will be retained. The vacant office complex in the southern portion of the property is currently being demolished. In addition to the retained structures, the proposed mixed-use development proposed to contain 101,000 square feet of retail space, 50,000 square feet of additional office space, two restaurant pads, a 100-room hotel, a senior assisted living facility, 606 apartment units, 160 stacked townhouse units, and a police sub-station building to be operated by the township.

The project also includes open space areas for public use, a park, and amenities for the residents including a pool, clubhouse and rooftop park. A pedestrian network of sidewalks and walking trails will provide connections within the project and will also connect to the existing Promenade and the Enclave.

Parking will be provided in the existing 3-story parking garage, new 5-story parking garages wrapped on 3 sides by residential apartment buildings, and surface parking, for a total of 3,984 parking spaces.

The proposed mixed-use development would consist of residential, office buildings, and retail with frontage on Welsh Road. The development is planned to be accessed from a future Turnpike interchange, once complete, which would connect through the property to Welsh Road. There is an existing portion of the Cross County Trail which would be extended as part of the pedestrian network throughout the site.

The property is currently zoned OC - Office Center. The zone allows for mixed use development when approved by the Board of Commissioners as a conditional use, subject to the requirements and criteria of § 255.61.1.

COMPREHENSIVE PLAN COMPLIANCE

MONTCO 2040 – The proposal is generally consistent with *MONTCO 2040: A Shared Vision*, which designates the area as the "Business Area" future land use category. Business Areas are concentrations of employment-oriented land uses, such as offices, research facilities, and industrial parks. Most office-oriented Business Areas are located near highway interchanges. The primary uses in these areas might include large offices or concentrations of offices, and research and development facilities. Secondary uses might include small-scale retail and service businesses, higher-density residential uses that are on the periphery of the area, among other supportive businesses. Development should be designed to accommodate significant automobile and truck trips, make it easy for employees to walk to public transportation, and control the impact of potential noise, light, and pollution on nearby residences.

Upper Dublin Comprehensive Plan – The proposal is generally consistent with the Upper Dublin Comprehensive Plan to redevelop the area as a commercial land use category; located in the OC - Mixed Use Commercial future land use category, which includes areas targeted for commercial development. In Upper Dublin this includes office development and small-scale to medium-scale retail.

RECOMMENDATION

The Montgomery County Planning Commission (MCPC) generally supports the applicant's proposal; however, in the course of our review we have identified the following issues that the applicant and township may wish to consider prior to conditional use approval and official land development submissions. Our comments are as follows:

REVIEW COMMENTS

FUTURE TURNPIKE ACCESS EASEMENT:

A. While the plan does indicate an area for a "Future Turnpike Access Easement" on the southern frontage of the property, the majority of a future interchange appears like it could be accommodated in the Turnpike right-of-way. However, we would encourage the property owner to coordinate with the Turnpike Authority and set aside a larger right-of-way area in conjunction with the township for future Pennsylvania Turnpike access, as well as ensure that the stormwater management basins in this area are designed so that they can remain with any future highway connection construction.

B. Additionally, for the development to have turnpike access, the turnpike ramp system must connect to a publically-owned road. Therefore, the township must own some roadway that connects Route 63 (Welsh Road) and the Turnpike, and the connection should be reasonably straightforward. The proposed development plan does not identify which streets, through the development, would be public. The applicant should make clear that there is publicly owned access to and from the Turnpike and clarify that process of how the Turnpike will get access to public roads that they will control. We recommend the applicant coordinate with the PA Turnpike Commission, PennDOT and the township on public access roads.

PARKING

A. Number of Parking Spaces. The applicant is proposing 3,984 parking spaces in 3 parking garages and surface parking lots. According to the conditional use site plan, only 3,314 parking spaces are required. Therefore, the proposed plan provides an excess of 669 parking spaces. The excess parking provides unnecessary impervious surface which could lead to increased heat island effect, pollutants from stormwater runoff and empty parking lots with minimal landscaping. We encourage the applicant to reduce the number of proposed parking spaces to be closer to the number of required parking spaces. This may be accomplished by removing some surface parking areas where appropriate and adding green parking lot standards to reduce runoff and mitigate urban heat island effects. An alternative to reducing the number of spaces could be to identify and donate the excess parking in reserve. Extra parking could then be built if/when proven necessary.

CONCEPTUAL SITE PLANS

A conceptual conditional use site plan, open space plan, stormwater management plan and landscape plan were submitted. A planning report was also submitted with descriptions of the potential development. As part of the conditional use plan approval, we are providing general comments that we feel are critical to address early in the plan review process prior to official preliminary submittal review.

The planning report titled "The Promenade East at Upper Dublin Mixed-Use Development," dated October 17, 2025, offered the following statement regarding compliance with conditional use criteria §255-61.1.

OC - Office Center District Conditional Use Criteria §255-61.1 - A Mixed-Use Development shall comply with the following requirements and criteria (as amended by Ord. No. 25-1400):

A. The development shall consist of a harmonious selection of uses and groupings of buildings, service and parking areas, circulation and green areas, ***planned and designed as an integrated unit, in such a manner as to constitute a safe, efficient and convenient center*** and encourage the use of green building technologies and sustainable design features.

APPLICANT RESPONSE:
The Project is a mixed development of residential, commercial and office uses, neighborhood open space and amenities, along with required parking and service areas. The Project is designed with a common architectural theme and using design elements that minimize the overall scale with visual building breaks and step-backs of the building facades. ***The proposed plan is configured to mitigate the visual impact of parking typically found in suburban developments.*** *Commercial parking has been distributed around the buildings and existing parking garage to provide safe and efficient access, while residential parking is centralized in internal parking garages, private driveways and shared surface parking. The development will incorporate numerous green building technologies and sustainable building practices including; green roofs, structured parking, electric vehicle charging stations, bike racks, and wetland replacement areas.*

1. *Mix of Uses*. We commend the applicant for incorporating a variety of uses in the overall development and strictly meeting the requirements regarding the mix of uses in the development standards.

2. *Development Pattern*. Even though the appropriate mix of uses is apparent on the entire property, the development pattern appears to be typical of suburban commercial developments as seen in many neighboring municipalities. It does not appear to be ***"planned and designed as an integrated unit, in such a manner as to constitute a safe, efficient and convenient center"***. It appears to be a collection of uses grouped together throughout a large property surrounded by large surface parking lots. For example, the commercial/retail uses are grouped together into suburban style strip retail development

pattern located within surface parking lots. The office space use is in a separate building rather than integrated above the commercial/retail areas. We encourage the applicant to explore a more integrated walkable mixed-use center design like the original promenade development with ground floor non-residential and residential or office space above making for a more walkable, compact pedestrian friendly development.

3. *Vehicular Circulation*. The proposed development consists of many surface parking lots and drive aisles in place of a hierarchical street network. There is no continuity of road network or continuation of the "main street" from the Promenade, which we understand is interrupted by an existing building that will remain, nor is there a street hierarchy that could be used to define the streetscape and help drivers navigate through the development. We recommend the applicant reconsider a hierarchical street system that would create a more navigable development overall.

4. *Pedestrian Circulation and Sidewalks*. There appears to be a robust network of paths and sidewalks throughout the development. However, the alignment of many of the sidewalks zig-zag their way through parking lots and the rest of the development which creates confusing wayfinding for pedestrians and potential conflicting with vehicular traffic in parking lots. This pattern of walkways may discourage nearby residents from walking to their internal destinations. We encourage the applicant to investigate alternative hierarchical street and parking layouts to make the development more pleasant pedestrian environment.

B. Cross County Trail. We commend the applicant for the addition of a 10-foot wide path all along Welsh Road and looping a path around the back of the property. Key recommendations focus on the trail crossing at the intersections at Welsh Road and Blair Mill Road and at Welsh Road and Computer Avenue.

1. *Trail Crossing at Welsh and Blair Mill Road.* The feasibility study recommends removing the slip lanes at the intersection of Welsh Road and West Prudential Drive to create a safer trail crossing, and if possible, narrow the entry road. The sketch plan shows a wide driveway entrance with slip lanes at the intersection of Welsh and Blair Mill Roads, where the trail is proposed to continue along Welsh Road. As shown in the sketch plan, the intersection is too wide to cross safely, and has limited pedestrian/bicycle refuge opportunities. With this configuration of the driveway entrance, we suggest moving the trail crossing back from the intersection to the narrower portion of the driveway where there would be fewer vehicle travel lanes to cross and a sufficient pedestrian/bicycle refuge area.

2. *Trail Crossing at Welsh Road and Computer Avenue*. In the proposed sketch plan, a user of the trail would have to make three crossings in order to cross Welsh Road and continue the trail along the PA Turnpike side of Computer Avenue. The feasibility study recommends that traffic signal upgrades should consider trail crossings on all four legs of the intersection at Welsh and Blair Mill Roads. However, future possible replacement of the Welsh Road bridge over the Turnpike could obviate the need for at-grade crossings at Welsh Road, since a trail could potentially be incorporated under the bridge. In addition, a curb bump-out could be considered for the northeast corner of the Computer Avenue and Welsh Road intersection to reduce pedestrian crossing times on Welsh Road.

3. *Shade Trees*. We commend the applicant for showing more street trees on the concept landscape plan along Welsh Road and the Cross County Trail.

4. *Trail Alignment*. The applicant is showing a 10-foot wide path along Welsh Road and around the entire perimeter of the property. This is a great loop system that will allow users to use the sections of the trails that are most comfortable for their ability.

5. *Fitness Center Location.* The fitness center is currently sited in the center of the development with no relationship the trail system being incorporated at the perimeter of the site. We encourage the applicant to find an alternative location with a more direct connection to the trail system to tie-in to the recreation/fitness aspect of the use.

C. Stormwater Runoff. The conceptual stormwater plan appears to depict long distances to traverse for water to reach naturalize basins and discharge points. Water traveling these long distances over surface parking and impervious surfaces will pick up pollutants and could have adverse effects on the natural environmental systems. We encourage the applicant to find additional areas for localized stormwater management BMPs such as rain gardens or bio-retention facilities to help mitigate these potential pollutant effects.

D. Neighborhood Open Space. Several of the "open spaces" used in the calculation for the neighborhood open space requirement are parking lot islands or along access driveways. We encourage the applicant to incorporate more useable public neighborhood open space.

E. Affordable Housing. New market-driven development presents an opportunity to discuss affordable housing as part of the development plan for the future. The county encourages all municipalities to consider housing affordability with inclusionary zoning that provides a bonus for a small percentage of affordable units built into the overall residential component. The county and MCPC recommends inclusionary units and can work with the municipality to provide resources towards facilitating the management of inclusionary units.

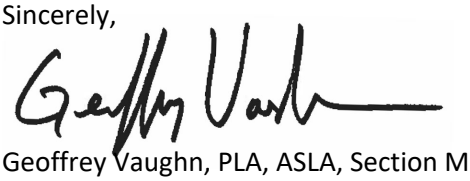
CONCLUSION

We wish to reiterate that MCPC generally supports the applicant's proposal but we believe that our suggested revisions will better achieve Upper Dublin's planning objectives for the mixed-use developments in the Office Center District.

Please note that the review comments and recommendations contained in this report are advisory to the municipality and final disposition for the approval of any proposal will be made by the municipality.

Should the governing body adopt this proposed zoning ordinance amendment, Section 609 of the Municipalities Planning Code requires that we be sent an official copy within 30 days.

Sincerely,



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c: BET Investments, Applicant
Carrie B. Nase-Poust, Esquire., Applicants Representative
Kurt Ferguson, Township Manager
Michael J. Cover, Chair, Upper Dublin Planning Commission
Tom Fountain, P.E., Upper Dublin Township Engineer
Patrick Stasio, Upper Moreland Township Manager
William T. Gildea-Walker, Horsham Township Manager