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Matthew J. Edmond, AICP
Executive Director

February 12, 2026

Robert A. Zienkowski, Township Manager
East Vincent Township
262 Ridge Road
Spring City, PA 19475

Re: Conditional Use - Pennhurst Data Centers
East Vincent Township - CU-01-26-18783

Dear Mr. Zienkowski:

A conditional use plan entitled "Pennhurst Data Centers", prepared by Langan Engineering and dated October 9, 2025, was received by this office on January 14, 2026. Although our review is not required by Act 247, the Pennsylvania Municipalities Planning Code as amended, our comments are offered as a planning service at the request of East Vincent Township. This review does not replace the need for an official referral by East Vincent Township of a preliminary or final subdivision or land development plan, as required by the Pennsylvania Municipalities Planning Code.

PROJECT SUMMARY:

Location:	North side of Brown Drive and the east and west sides of Commonwealth Drive, north of Dunlap Road (shown on the plan as private roads)
Site Acreage:	124.57 acres
Lots/Units:	Six lots/six structures
Non-Res. Square Footage:	1,381,268 square feet
Proposed Land Use:	Industrial/commercial
New Parking Spaces:	488 spaces
Municipal Land Use Plan Designation:	High Intensity Mixed Use
UPI#:	21-1-91, 21-1-92.8, 21-1-92.10, 21-1-92.9, 21-1-76, 21-1-92.7

PROPOSAL:

The applicant proposes the construction of a data center including six structures (at least five of which are two stories) totaling 1,381,268 square feet, and other smaller structures, a proposed "substation" and 488 parking spaces, in a campus-like setting. The site will be served by public sewer facilities, and an email from the applicant to CCPC dated January 15, 2026 stated that "We have not determined yet if we will utilize public or private water sources." The site is located in the East Vincent Township IMU Industrial Mixed Use District.

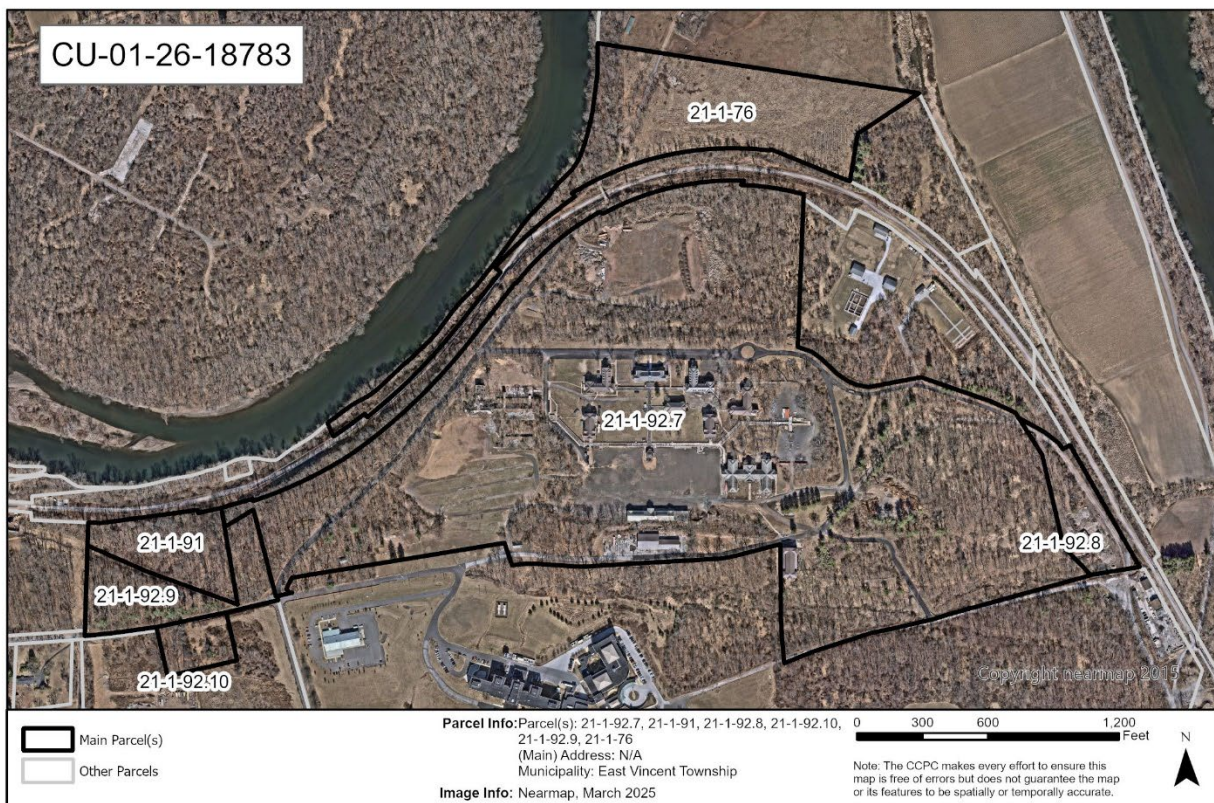
A map note on the plan states that:

“Based on Section 27-2802.3E, a data center use is permitted within the IMU district, provided it receives conditional use approval. Per Section 27-2802.3E, planned commercial developments, including any use authorized in the GI (General Industrial) District is permitted as a conditional use provided that the development meets the provisions set forth for the GI District. Therefore, the GI District requirements are used in the (zoning ordinance bulk and lot requirements) table above. Separately, Section 27-1302.4F states that in the GI district, any lawful purpose may be permitted as a conditional use, so long as it is not explicitly prohibited. This provision allows for data centers, making them a type of use that can then be approved in the IM zoning district under the first rule.”

RECOMMENDATION: East Vincent Township should consider the comments in this letter before acting on the conditional use application.

BACKGROUND:

1. The Chester County Planning Commission previously received several proposed Township Zoning Ordinance amendments relating to regulating Data Center Campus and Data Center Campus Development use by special exception in the IMU – Industrial Mixed Use District, including definitions and related provisions. Our last review of those amendments was forwarded to the Township in a letter dated December 9, 2025 (refer to CCPC # ZA-11-25-18728). We understand that the proposed amendment was not adopted.



LANDSCAPES:

2. This site is located in the **Suburban Landscape** designation of [Landscapes3](#), the 2018 County Comprehensive Plan. The vision for the **Suburban Landscape** is predominantly residential communities with locally-oriented commercial uses and facilities, accommodating growth at a medium density that retains a focus on residential neighborhoods, with enhancements in housing diversity and affordability. Additionally, roads, sidewalks and paths with convenient access to parks and community facilities should be provided.

The proposed data center could be consistent with the objectives of the **Suburban Landscape**, but the Township should carefully consider the comments in this letter and craft changes to the proposed design that can limit the avoidable externalities potentially associated with a data center.

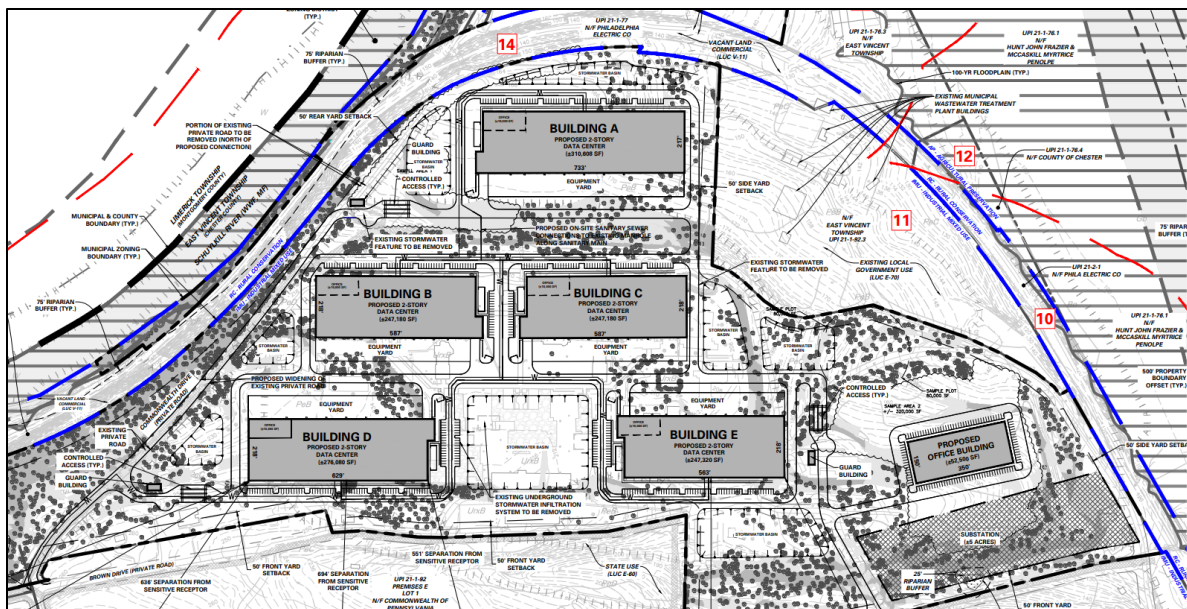
WATERSHEDS 2045:

3. **Watersheds 2045**, the County-wide integrated water resources plan and Act 167 Stormwater Management Plan, indicates the proposed development is located within the Schuylkill River watershed. The **Watersheds 2045** plan's highest priority objectives within this watershed are:

- addressing causes of stream impairments;
- implementing comprehensive stormwater management;
- protecting vegetated riparian corridors and first order streams; and
- expanding water-based recreational opportunities and access.

Watersheds 2045 can be accessed at www.chesco.org/watersheds2045.

Land disturbance and land development activities that occur within Chester County must comply with the **County-wide Act 167 Stormwater Management Plan for Chester County, PA** (August 2022) and the associated Act 167 stormwater management ordinance standards adopted by each municipality.



Detail of Pennhurst Data Centers Conditional Use Plan

PRIMARY ISSUES:

This review of the proposed data center reflects many of the comments in our review letter of December 9, 2025 (CCPC # ZA-11-25-18728), while this letter applies those comments (and other matters) to the current submission.

4. As noted in our review of a previous version of this amendment, data centers have become essential to meet the demands of artificial intelligence, telecommunications, and computer systems, and they are also associated with high energy use, water consumption, noise, building mass, environmental protection, among other concerns. As the Township reviews this conditional use, the Board of Supervisors should be aware that the Pennsylvania Municipalities Planning Code, Section 913.2(a) permits the Board of Supervisors to "...impose reasonable conditions on such proposed facilities and "...attach such reasonable conditions and safeguards, in addition to those expressed in the ordinance, as it may deem necessary to implement the purposes of ...the zoning ordinance." We encourage the Board to consider all reasonable conditions and safeguards as necessary.
5. The Township should note that this proposal is located in the IMU – Industrial Mixed Use District, and also within the "High Intensity Mixed Use" designation in the 2018 East Vincent Township Comprehensive Plan's Map 9, "Future Development Plan". (The East Vincent Township Comprehensive Plan is available at:
https://www.eastvincent.org/vertical/sites/%7B5B8F1E55-6CA8-450E-BB40-12A8385B1313%7D/uploads/EVT_COMP_PLAN_FINAL_VERSION_10-04-2018_v1.1.pdf)

Page 24 in the Comprehensive Plan describes the High Intensity Mixed Use designation as:

"These areas include the "Jones Motors" and "Pennhurst" sites and some adjacent properties. These areas are currently zoned PO-Industrial/Professional/Office Research, Commercial Mixed-Use and Industrial Mixed-Use. Since all these districts promote higher intensity development that include a variety of uses, it is recommended that they be combined into a single zoning district that promotes large-scale planned development that includes residential and non-residential use. The new zoning should also incorporate design standards to insure future development results in high quality streetscapes within a walkable pedestrian scale community."

Also, the area is within the Schuylkill River Heritage Area. As described on page 8 of the Comprehensive Plan:

"This area, which is now referred to as the Schuylkill River Greenways National Heritage Area, covers the Schuylkill River watershed in Schuylkill, Berks, Chester, Montgomery, and Philadelphia Counties. This region is nationally significant for the role that its people, places, and events played during the American, Industrial, and Environmental Revolutions. The Heritage Area provides public drinking water to 1.5 of the 3.2 million people across five counties."

As stated in the East Vincent Township Comprehensive Plan, the IMU District includes a variety of uses (e.g., residential and non-residential). For these reasons, the Township should stress the need for screening and setbacks, especially to the south, to protect nearby residential areas. The existing vegetation on the site, and especially along its perimeter, should be retained to the fullest practical extent.

The policies in the Township's Comprehensive Plan and reflected in the Schuylkill River Heritage Area should guide and inform the Township's review of this conditional use proposal. Specifically, the following issues should be addressed by the applicant:

- A. Sound, Noise and Vibration. The effects of sound, noise and vibration, especially on the nearby veteran's center, should be thoroughly evaluated and mitigated. This may require the preparation of a sound and vibration study. The Township will need to engage a person who is trained and qualified in the use of specialized equipment necessary to establish objective measurements to identify and mitigate these effects.

The provisions relating to noise should specifically include vibrations perceived through the ground, or which may be intermittent. Because it may be difficult to assess compliance during times when sound disturbances may be most noticeable, such as during nights and weekends, or when Township staff may be unavailable to respond to complaints, the applicant should identify a person(s) who will be available on a 24-hour basis to receive and act on sound, noise and vibration complaints. Section 27-2802.2.A. (Prohibited Uses) states:

“Any use which may be noxious or offensive as per § 27-1716 (i.e., “Physical Performance Requirements” in the Ordinance, including Air Quality, Noise and Vibration, as well as Radioactivity or Electrical Disturbances) or by reason of the emission of odor, dust, fumes, smoke, gas, vibration, noise, air pollution, fire and explosive hazards, glare and heat, liquid and solid waste, vibration, radioactivity, or electromagnetic interference, so as to constitute a nuisance.”

The preparation of a sound and vibration study can help address the potential nuisances listed in Section 27-1716.

We also note that the applicant's application of the IMU District's provisions refer to the provisions in Zoning Ordinance Section 27-2802.3.E, (relating to “Planned commercial development”), and further subject to the provisions of Sections 27-1103.2 and 27-1104.2. (i.e., in the GI General Industrial District.) Section 27-1104.2.C. requires that:

“Within a planned commercial development, one individual building may contain up to a maximum of 60,000 square feet of total floor area, except where increased square footage above 60,000 is entirely within an additional story or stories permitted through receipt of transferable development rights as provided in Part 24.”

The applicant should demonstrate how the six, two-story buildings will conform to this requirement.

- B. Environmental Protection. The Township should require the data center operator to provide routine public reports on environmental impacts such as water usage, air quality and noise levels, including regular/continuous monitoring of such impacts. The Township should also consider the potential effects of locating a data center near a floodplain or near the Schuylkill River. (Again, the applicant should address the provisions of Section 27-1716).

The applicant should contact the office of the Chester County Conservation District (telephone #610-455-1360) for information and clarification on erosion control measures. The provisions of the Commonwealth Erosion Control Regulations may apply to the project and may require an Earth

Disturbance Permit or a National Pollutant Discharge Elimination System permit for discharge of stormwater from construction activities. Additional information on this topic is provided online at: <https://www.chesco.org/284/ErosionStormwater>.

The site contains land within the 100 year flood plain. Although it does not appear that any development activity will encroach into the floodplain, we note that the County Planning Commission does not support development in the floodplain, and the Federal Emergency Management Agency and Pennsylvania Department of Environmental Protection regulate filling or development in the floodplain. Development within a floodplain can increase the magnitude and frequency of normally minor floods, and present health and safety problems.

The site contains delineated wetlands. Although it does not appear that any development activity will encroach into the delineated wetland area, the applicant should be aware that placement of fill in wetlands is regulated by the Corps of Engineers in accordance with Section 404 of the Clean Water Act (1977) and the Department of Environmental Protection under Chapter 105 Rules and Regulations for the Bureau of Dams and Waterway Management.

The **Hopewell Big Woods** represents the last large, unbroken forest in southeastern Pennsylvania. This is an exceptional forest with hundreds of plant and bird species, unique wetlands, and clean streams, and provides open space, drinking water, and unique scenic, cultural, and natural resources. Elverson Borough, East Nantmeal, East Vincent, North Coventry, South Coventry, Warwick, West Nantmeal, and West Vincent townships have recognized the value of this area by joining the Hopewell Big Woods Partnership, which seeks to conserve the Woods. *Landscapes3* recognizes the **Hopewell Big Woods** as a natural resource priority protection area. Protecting natural areas helps ensure that the critical functions these areas provide will not diminish due to development. We recommend that as much of the existing wooded area on the site be preserved as possible.

- C. Electricity Use. Data centers are intensive energy users. We suggest that the applicant review how the data center's anticipated electricity demand may affect the capacity of the grid without creating the potential for brownouts or failures. The applicant should discuss how the data center will operate when power from the grid is lost (battery-based backup power supplies may not be adequate for more than short power outages).

Also, the applicant should elaborate on the "substation" shown at the southeast part of the site and should indicate how it will be fueled and supplied. In addition, it may be more appropriate to locate the substation in a more-remote portion of the site to limit any effects on adjacent areas as well as to increase its security.

The applicant should address the estimated impacts on electric rates or power availability for other uses directly attributable to the data center campus. Some other municipalities have attempted to require data center operators to reduce their power demands during periods of excessive demands on the grid, to avoid brownouts or blackouts.

- D. Cooling. The applicant should more-fully address the use of water for cooling the data center, as well as clarify whether public or on-site water will be used. If on-site water will be used, the applicant should clarify whether significant withdrawals from the aquifer will be required. For both public water supply or private wells, the applicant should ensure compliance with Delaware River Basin Commission, state and local regulations and obtain appropriate permits as appropriate.

The Township should ensure that any release of water used for cooling (if a closed-loop system is used, occasional releases may be necessary) will not adversely affect the watershed because such water may be at a higher temperature than that of the receiving water. The applicant should also discuss what will happen if adjacent water wells are affected by the facility's water use. The applicant should also indicate if methods to release excess heat from cooling water may require the use of cooling towers, with their attendant visible plumes of water vapor.

- E. Access and Circulation. The applicant's submission indicated that an earlier traffic study for this site dated May 7, 2021, which reviewed a proposal for a light-industrial development, still adequately reflects the proposed traffic effects of this data center. The applicant should use current information about traffic generated by data centers, and the Township's review of this plan submission would benefit from the preparation of a traffic impact study specifically addressing the potential impacts posed by this project.

The plan indicates that the site fronts on Brown Drive, Commonwealth Drive, and Dunlap Road, which are shown on the plan as private roads. The applicant should elaborate on the adequacy of these access roads. The plan should also address how access will be provided to adjacent Township, Commonwealth of Pennsylvania, Pennsylvania Electric Company, and privately-owned parcels; specific access easements may be necessary.

Water Resources Information

East Vincent Township

Schuylkill River, Schuylkill River Basin

FEMA: n/a

MS4 community: YES

TMDL: Schuylkill River PCB TMDL

Impairments for Schuylkill River:

Fish Consumption: Source Unknown - Polychlorinated Biphenyls (PCBs)

Aquatic Life: Urban Runoff/Storm Sewers - Cause Unknown; Municipal Point Source Discharges -

Cause Unknown; Agriculture - Cause Unknown

Designated uses: Warm Water Fishes - Migratory Fishes

6. The applicant should provide the Township Engineer with a copy of the stormwater report for this proposed development.
7. The proposed substation area includes an unnamed tributary to Schuylkill River. The proposed substation at this location may be subject to risks of flooding and high-water tables. Furthermore, the applicant should review and comply with the Township's riparian buffer provisions (§ 23-312 Riparian Buffers) for the proposed development plan.
8. We recommend the design of proposed stormwater basins be modified to conform more with the natural drainage pattern and existing topography of the site, to limit earth disturbance, and minimize soil compaction. Applying these considerations enhances the potential of the stormwater basins to be a visual amenity. To provide visual interest, the shape of the basins should be as natural looking as practical. The natural topography is usually curvilinear and less "boxy" or geometrically shaped. Creating a variety of slope changes so the sides of the basins undulate also mimics natural conditions.

9. The Schuylkill River's designated use is Warm Water Fishes (WWF), Migratory Fishes (MF) by the state. Increases in impervious cover elevates the risk of thermal degradation in streams, which could impact fish populations. To minimize thermal impacts to the adjacent streams, the applicant should provide details of the types of vegetation to be planted in the basins. If proposed plans do not intend to design and install naturalized stormwater management BMPs, we recommend such plantings to improve nutrient and sediment uptake and improve wildlife and pollinator habitat. The landscape plan should incorporate raingarden seed mix and appropriate water-tolerant native shrubs into the design to promote greater infiltration.
10. Due to the proposed addition of roadways, parking areas, and sidewalks, the applicant should establish a de-icing plan and identify a material storage area that minimizes the volume of de-icing chemicals and pollutants that will directly infiltrate to the groundwater or run off to streams. Reducing chloride runoff from all pavement sources as well as roads is increasingly needed to minimize impacts to receiving waterbody.

Additional Comments:

11. The previously proposed data center amendment that was reviewed by the County Planning Commission included an element regarding a requirement that the proposed data center buildings must be designed and constructed to meet the standards of the US Green Building Council LEED Gold certification program.

It may still be appropriate to encourage the applicant to reasonably strive towards achieving a LEED certification. Applicants can also register with the US Green Building Council at any time to indicate the intent to pursue a LEED certification. Applicants can also apply for pre-certification for projects in the design phase to gain recognition of sustainable goals prior to completion (refer to: <https://www.usgbc.org/leed>).

12. Some data centers operate without significant (or minimal) on-staff personnel and require minimal interior lighting. Additional security and site access concerns should be discussed with the applicant to ensure that only authorized personnel can enter the center and its grounds. The applicant should explain why 488 parking spaces are necessary.
13. The Township's first responders should assess how they will handle emergencies, especially when data centers typically involve electrical equipment, water systems and hazardous materials. The Township should ensure that this proposal provides for in-building coverage for public safety and emergency service radio communications. The applicant should contact the Chester County Department of Emergency Services Technical Division at 610-344-5000 for additional information on this issue.
14. The applicant and the Township should consider relocating the proposed office building (as well as the substation) to an interior portion of the site to increase security, and require all vehicles entering and exiting the site to pass through a guard building with controlled access (three guard buildings are shown, it may be preferable for a single, secure point of controlled access be provided). Perimeter security should also be discussed, such as the use of fences.
15. The applicant and the Township should discuss potential future re-uses of the buildings if they eventually become redundant, as well as discuss the disposal of e-waste.

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Re: Conditional Use - Pennhurst Data Centers

East Vincent Township - CU-01-26-18783

16. The Schuylkill River Trail passes near this site and adjacent areas are located in the RC-Rural Conservation and AP- Agricultural Preservation zoning districts. The Township should stress the need for screening the Trail, and the applicant should elaborate on the area on the plan identified as “RESERVED FOR OPEN SPACE/FUTURE DEVELOPMENT”. Due to the proximity of the Schuylkill River Trail, we recommend that this area be preserved as open space.
17. Because of the buildings’ extensive mass, the applicant and the Township should discuss architectural elements and designs that may help the proposed buildings better fit with the character of the area, such as by using pitched roofs or parapets, compatible colors, arches, awnings, and similar architectural elements.
18. The proposed buildings include large roof areas that may offer opportunities to improve the facility’s long-term sustainability and reduce its reliance on energy from the grid, such as designs that incorporate “green roofs,” “white roofs” and solar photovoltaic energy systems. Green roofs can reduce a building’s stormwater runoff, improve insulation, increase the longevity of the roof system, and reduce heating and cooling costs. White roofs can help reflect solar radiation and also reduce cooling costs. Photovoltaic energy systems can improve the facility’s long-term sustainability and reduce its reliance on energy from the grid. Additional information on green roofs is available at: <https://www.chescoplanning.org/MuniCorner/eTools/05-GreenRoofs.cfm>. Additional information on alternative energy systems such as photovoltaic systems is available at: <https://www.dvrpc.org/EnergyClimate/AEOWG/>.
19. The Township should review how other municipalities regulate data centers:
 - Penn Future prepared a model data center ordinance, at: <https://www.pennfuture.org/datacenters>.
 - The York County Planning Commission also prepared a model ordinance, at: <https://www.ycpc.org/Search?searchPhrase=data%20center&pageNumber=1&perPage=10&departmentId=-1>
 - The Loudoun County data center ordinance is available at: <https://online.encodeplus.com/regs/loudouncounty-va-crosswalk/doc-viewer.aspx#secid-859>

RECOMMENDATION: East Vincent Township should consider the comments in this letter before acting on the proposed zoning ordinance amendment.

We request an official copy of the decision made by the East Vincent Township Supervisors, as required by Section 609(g) of the Pennsylvania Municipalities Planning Code. This will allow us to maintain a current file copy of your ordinance.

Sincerely,



Wes Bruckno
Senior Review Planner

cc: Langan Engineering
Chester County Conservation District
Chester County Water Resources Authority
Pennhurst Holdings DE LLC
Chester County Department of Emergency Services Technical Division