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Scott France, AICP
Executive Director

July 14, 2026

Ms. Anne W. Klepfer, Manager
Upper Hanover Township
1704 Pillsbury Road—Box 27
East Greenville, Pennsylvania 18041

Re: MCPC #26-0168-001
Plan Name: Gravel Pike Data Center
(1 lot comprising 37.47 acres)
Parcel ID: 57-00-01282-002
Situate: Gravel Pike/southeast of Ziegler Road
Upper Hanover Township

Dear Ms. Klepfer:

We have reviewed the above-referenced conditional use application in accordance with §500-818 of the Upper Hanover Township Code, as you requested on June 15, 2026. We forward this letter as a report of our review.

BACKGROUND

The applicant, Hanover Development, L.P., proposes to develop the subject parcel with a 150,000-square-foot data center in the Light Industrial (LI) zoning district. The applicant asserts that a data center is allowable as a conditional use in the LI district because it should be considered "light industrial," based on the definition in the Township Code, and is also a "use of similar character" to those otherwise permitted in the LI district.

The application was received at the township on June 9, 2026, before the close of business. Later that evening, the Township Board of Supervisors adopted a zoning ordinance amendment (Ord. 2026-04) which introduced "data center" as a use in the Code and permitted this use only as a conditional use in the Outdoor Storage and Intensive Commercial/Industrial (OS) zoning district. Because the application was received prior to the amendment's adoption, the application is not subject to the terms of the new ordinance.

COMPREHENSIVE PLAN CONSISTENCY

Neither the regional nor county comprehensive plan names "data center" among the future land uses. However, the appropriateness of location can be assessed by considering the industrial nature and the intense impacts associated with this land use. The County's *Data Center Ordinance Guide* (2026) states that in Southeastern Pennsylvania, data centers are "most appropriate in heavy industrial settings, which are typically located away from residential or other sensitive uses" (p. 6).

REGIONAL PLAN

The future land use element of *The Upper Perkiomen Valley Regional Comprehensive Plan* (Regional Plan) places the subject parcel in the Commercial/Industrial Center, where "the dominant uses…are and should continue to be a mix of shopping centers and strip-style development, office parks, and light industrial operations, including manufacturing, processing, warehousing and distribution, and research and development" (p. 160). As the *Data Center Ordinance Guide* recommends that a data center is "most appropriate in heavy industrial settings," a data center proposed in the township would be most appropriate in a location that the Regional Plan identifies for heavy industrial future land uses.

Two areas of the township are assigned the heavy industrial future land use designation in the Regional Plan, and these areas are both zoned in the Outdoor Storage and Intensive Commercial/Industrial (OS) district. (See Attachments A and B.) The OS district generally matches the coverage and boundaries of the Regional Plan's heavy industrial future land use area. While "data center" is not a named use in the previous ordinance, §500-1902.B.6 allowed in the OS district "any other use not permitted within any other district, provided that the applicant shall demonstrate to the satisfaction of the Board of Supervisors that provisions will be made to adequately reduce or minimize any noxious, offensive or hazardous features of such use."

COUNTY PLAN

The county plan takes a broader approach to land use. The future land use element of *Montco 2040: A Shared Vision* places the subject parcel in the Business Area. Business Areas contain a range of potential uses that could include data centers, but the most appropriate location for a data center may depend on additional factors such as known sensory or environmental impacts and its proximity to sensitive uses.

COMMENTS

In the conditional use application, the applicant asserts that the proposed data center is allowed in the LI district as a conditional use because: 1) the proposed data center is a "light industrial" use, based on the Township Code's definition; and 2) it is a "use of similar character" to those otherwise permitted in the LI district. We have reviewed the applicable sections of the Code (§§500-201, 500-1801) and present our comments here:

LIGHT INDUSTRIAL USE (§500-1801.A.)

The Township Code §500-201 defines "industry, light" as "industrial activities which are carried out entirely within an enclosed building and involve no outdoor processes or outdoor storage of primary raw materials"; and "industry, heavy" as "industrial activities which do not meet the definition of 'light industry.'" We acknowledge that the proposed data center—which we consider a heavy industrial use—arguably could meet the Township Code's definition of a light industrial use. However, the distinction may be inconsequential: §500-1801.A. still does not state that a data center is allowable in the LI district.

Section 500-1801.A. names the specific light industrial uses that are permitted in the LI district. Paragraph (4) allows some additional light industrial uses apart from those expressed in paragraphs 1, 2, 3, and 5, "as a conditional use pursuant to the criteria set forth elsewhere in this chapter." Those conditional uses named are "warehousing, storage or wholesale business located within a building as a principal use and/or distribution of products or materials, including transportation depot and truck terminals." The LI district permits specific light industrial uses: "data center" is not identified as a permitted light industrial use in the LI district.

> §500-1801
>
> The following uses are permitted in the LI Light Industrial District:
>
> A. Light industrial.
>
> (1) Manufacturing and processing.
>
> (2) Scientific or industrial research, product development, or engineering facilities.
>
> (3) Printing, publishing, lithography and similar processes.
>
> (4) As a conditional use pursuant to the criteria set forth elsewhere in this chapter, Warehousing, storage or wholesale business located within a building as a principal use and/or distribution of products or materials, including transportation depot and truck terminals. [Amended 6-11-2024 by Ord. No. 2024-04]
>
> (5) Recycling facilities, limited to collection, separation, storage, baling and shipping.

USE OF SIMILAR CHARACTER (§500-1801.D.)

To substantiate that a use is a "use of similar character" to those in §500-1801, Subsection D requires that the applicant provide evidence to the Board of Supervisors that is "sufficient to prove that the proposed operations, magnitude of development, and effects on the environment and vehicular traffic

will be essentially the same as those of uses specifically identified above." In addition to the light industrial uses (subsection A), there are over a dozen other uses that are "identified above" (in subsections B and C). The full list of these other uses can be found in Attachment C of this letter.

> §500-1801.D. Uses of similar character. Uses of similar character to those listed in Subsections **A**, **B** and **C** may be permitted by conditional use only when evidence is provided to the Board of Supervisors sufficient to prove that the proposed operations, magnitude of development, and effects on the environment and vehicular traffic will be essentially the same as those of uses specifically identified above.

Data centers can have substantial impacts, and they may vary dependent upon the design and operations of the facility; the applicant would need to present convincing evidence that any such impacts would be mitigated enough that they would be "essentially the same" as those of uses otherwise permitted in the LI district.

IMPACTS TO CONSIDER

A. Noise/Vibration.

1. Large-scale data centers generate continuous and, at times, intermittent noise (in the case of generators) from mechanical and electrical equipment required to support their 24/7 operations. Primary sources of noise include rooftop chillers, cooling towers, dry coolers, large air-handling units, transformer hum from on-site substations, and backup diesel generators during testing or outages. While much of this equipment produces steady broadband "white" noise, certain components—particularly fans, compressors, and generators—can emit tonal or low-frequency sounds that travel farther and penetrate buildings more readily.

2. In addition to airborne noise, vibration from some data center equipment can transmit through the ground or building structure if not properly isolated. For nearby residential areas, these conditions may result in sleep disturbance, reduced outdoor enjoyment, and other negative impacts. Low frequency sounds also negatively impact wildlife and farm animals, adding farms and conservation areas to the list of adjacent uses to treat with sensitivity.

B. Energy Sources.

1. Large-scale data centers are among the most energy-intensive land uses, with individual facilities often demanding 50 to 100 megawatts of electricity or more—comparable to the consumption of a small city.

2. Some data centers may opt to install their own dedicated power generation plant, called "co-location." While uncertain with the sketch plan, there exists the possibility that this could be a consideration for the data center proposed here. A power generation facility co-located on the same tract of a data center has the potential to be more impactful to nearby uses than the data center itself.

3. Data centers commonly use backup generators to ensure uninterrupted power during grid outages. These backup generators are most often diesel powered. Diesel powered generators are tested regularly and run during power outages: this can be noisy and generate emissions such as NOx, a greenhouse gas and air pollutant that can cause health issues with prolonged exposure.

C. Water Usage.

1. Typical water-based cooling systems use large volumes of water to dissipate the intense heat generated by servers and associated equipment, and individual large-scale and hyperscale data centers may consume millions of gallons of water annually to support cooling operations alone.

2. Co-located power systems most commonly utilize natural gas turbine generators, which also require large amounts of water for power production. Coupled with a water-cooled data center, overall water needs for large-scale and hyperscale data centers can be substantial.

D. Emergency Services.

1. Data centers present unique challenges for emergency management. Issues include data security and the threat of cyberattacks, a large amount of heat-generating electrified equipment and the risk of fire; buildings of great length and/or height, and hazardous materials such as refrigerants and batteries. Local emergency service providers may be unfamiliar with data center operations and the potential hazards involved and should receive training in advance of the data center becoming operational.

E. Electronic Waste.

1. Data centers produce large amounts of electronic waste, as well as batteries and hazardous materials. Servers are replaced with new ones at regular intervals, requiring disposal of large amounts of electronic equipment.

OTHER COMMENTS: SKETCH PLAN

In our review of the submitted sketch plan, we had the following concern:

UTILITIES

A. Gas Line Relocation. The sketch plan indicates that a gas line will need to be relocated to develop the site as indicated. This requires coordination and approval from the utility company, so we acknowledge that this may affect the proposal's feasibility.

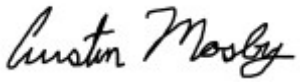
CONCLUSION

In this conditional use review, we considered if the proposed data center could be a conditional use in the LI–Limited Industrial zoning district in Upper Hanover Township. Ultimately, that decision will be determined by the Township Board of Supervisors after consideration of all factors presented in the

hearing process; we believe our recommendations and comments in this letter will help the township advance the future land use vision outlined in the Regional Plan and *Montco 2040*.

This review is informed by the County's *Data Center Ordinance Guide* (2026), published in partnership with Chester County. Please note that the review comments and recommendations contained in this letter are advisory to the municipality and final disposition for the approval of any proposal will be made by the municipality.

Sincerely,

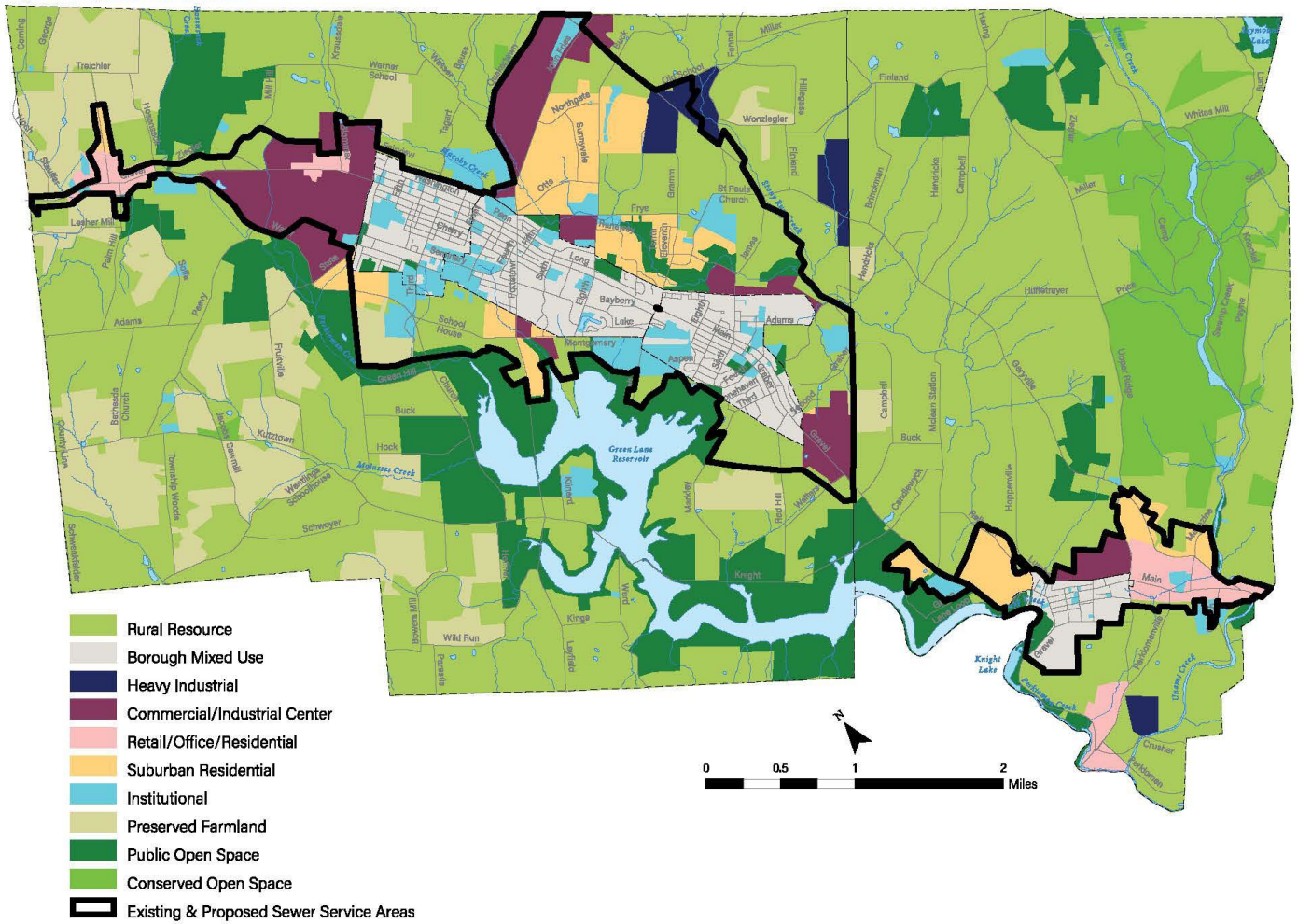


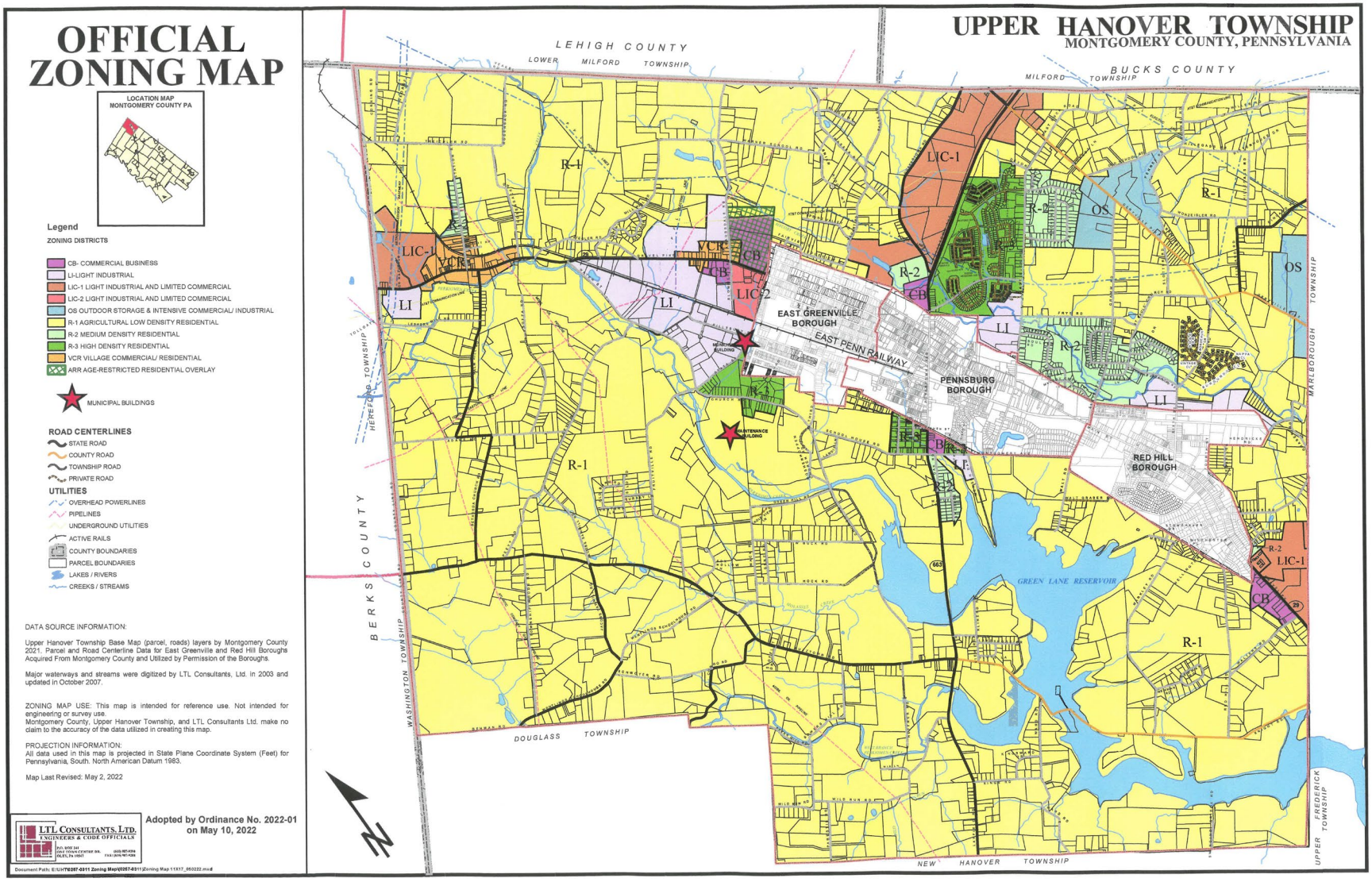
Austin Mosby, AICP
County Planner II
Montgomery County Planning Commission
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austin.mosby@montgomerycountypa.gov

c: Hanover Development, LP, Applicant
J. Edmund Mullin, Esq, HRMML, Applicant's Representative
Richard Fain, Chair, Township Planning Commission

Attachments: A. Township Plan Future Land Use Map
B. Township Zoning Map
C. List of uses from Section §§500-1801.B.– 500-1801C.
D. Aerial Image of Site
E. Site Plan

Figure 79 | *Future Land Use*




OFFICIAL ZONING MAP
LOCATION MAP MONTGOMERY COUNTY PA
Legend
ZONING DISTRICTS
CB- COMMERCIAL BUSINESS
LI-LIGHT INDUSTRIAL
LIC-1 LIGHT INDUSTRIAL AND LIMITED COMMERCIAL
LIC-2 LIGHT INDUSTRIAL AND LIMITED COMMERCIAL
OS OUTDOOR STORAGE & INTENSIVE COMMERCIAL/ INDUSTRIAL
R-1 AGRICULTURAL LOW DENSITY RESIDENTIAL
R-2 MEDIUM DENSITY RESIDENTIAL
R-3 HIGH DENSITY RESIDENTIAL
VCR VILLAGE COMMERCIAL/ RESIDENTIAL
ARR AGE-RESTRICTED RESIDENTIAL OVERLAY
MUNICIPAL BUILDINGS
ROAD CENTERLINES
STATE ROAD
COUNTY ROAD
TOWNSHIP ROAD
PRIVATE ROAD
UTILITIES
OVERHEAD POWERLINES
PIPELINES
UNDERGROUND UTILITIES
ACTIVE RAILS
COUNTY BOUNDARIES
PARCEL BOUNDARIES
LAKES / RIVERS
CREEKS / STREAMS
DATA SOURCE INFORMATION:
Upper Hanover Township Base Map (parcel, roads) layers by Montgomery County 2021. Parcel and Road Centerline Data for East Greenville and Red Hill Boroughs Acquired From Montgomery County and Utilized by Permission of the Boroughs.
Major waterways and streams were digitized by LTL Consultants, Ltd. in 2003 and updated in October 2007.
ZONING MAP USE: This map is intended for reference use. Not intended for engineering or survey use.
Montgomery County, Upper Hanover Township, and LTL Consultants Ltd. make no claim to the accuracy of the data utilized in creating this map.
PROJECTION INFORMATION:
All data used in this map is projected in State Plane Coordinate System (Feet) for Pennsylvania, South. North American Datum 1983.
Map Last Revised: May 2, 2022
LTL CONSULTANTS, LTD.
ENGINEERS & CODE OFFICIALS
Adopted by Ordinance No. 2022-01 on May 10, 2022
UPPER HANOVER TOWNSHIP
MONTGOMERY COUNTY, PENNSYLVANIA
LEHIGH COUNTY
LOWER MILFORD TOWNSHIP
BUCKS COUNTY
MILFORD TOWNSHIP
BERKS COUNTY
WASHINGTON TOWNSHIP
HEREFORD TOWNSHIP
MARLBOROUGH TOWNSHIP
EAST GREENVILLE BOROUGH
PENNSBURG BOROUGH
RED HILL BOROUGH
EAST PENN RAILWAY
GREEN LANE RESERVOIR
DOUGLASS TOWNSHIP
NEW HANOVER TOWNSHIP
UPPER FREDERICK TOWNSHIP
R-1
R-2
LIC-1
LIC-2
LI
CB
VCR
OS

Section 500-1801

B. Offices, services and other nonindustrial businesses.

(1) Corporate headquarters, administrative offices and buildings.
(2) Business, professional, medical and/or dental offices.
(3) Veterinary hospitals and adjunct facilities, including kennels.
(4) Training facilities, technical schools.
(5) Nursery school, preschool or day-care centers.
(6) Emergency services (fire, ambulance and police).
(7) Self-service storage facilities in compliance with § 500-835 of this chapter.
[Amended 9-13-2005 by Ord. No. 2005-10]
(8) Radio or television studios and transmission facilities.
(9) Electric, telephone or gas distribution facilities and/or transmission lines.
(10) Wireless telecommunications facilities in compliance with § 500-833 of this chapter.
(11) Public or private sewer and/or water utilities, including treatment facilities.
(12) Large-scale indoor commercial recreation facilities, such as bowling alleys, tennis and racket clubs, skating rinks, fitness centers, and/or outdoor nonmotorized sports facilities.
(13) Small-scale electrical-power-generating facilities, maximum 100 megawatts, by conditional use in compliance with § 500-1806 herein.
(14) Accessory uses customarily incidental to the uses listed above.

C. Other uses.

(1) Agriculture.
(2) Institutional uses, in compliance with Article XXVI, Institutional Use Regulations, of this chapter.
(3) Recreational uses, in compliance with Article XXVII, Open Space and Outdoor Recreation Regulations, of this chapter.
(4) Accessory uses customarily incidental to the uses listed above.

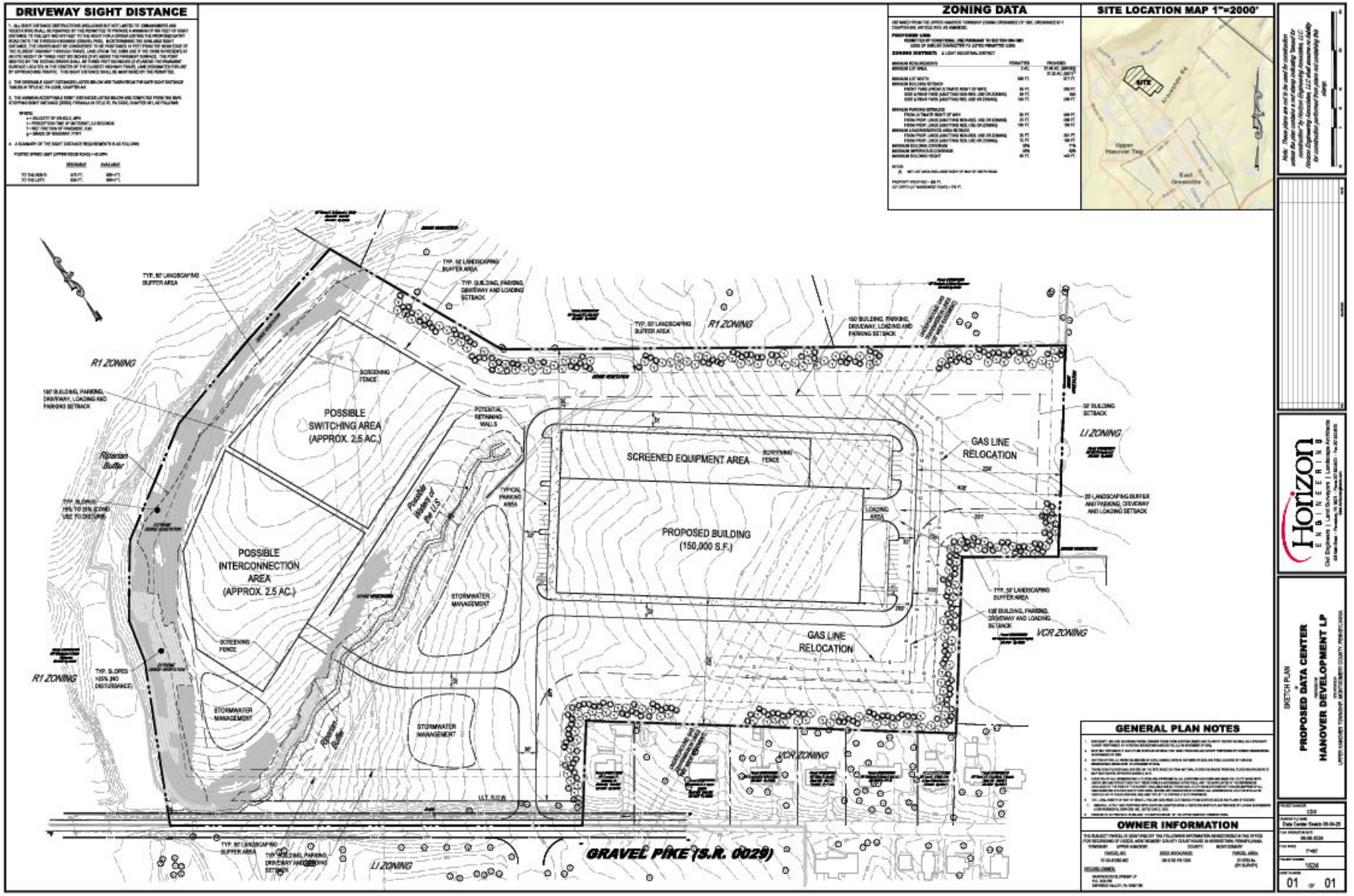


Gravel Pike Data Center
MCPC#260168001

Montgomery County Planning Commission

0 150 300 600 Feet

N


DRIVEWAY SIGHT DISTANCE
ZONING DATA
SITE LOCATION MAP 1"=2000'
SITE
POSSIBLE SWITCHING AREA (APPROX. 2.5 AC.)
POSSIBLE INTERCONNECTION AREA (APPROX. 2.5 AC.)
SCREENED EQUIPMENT AREA
PROPOSED BUILDING (150,000 S.F.)
GAS LINE RELOCATION
GAS LINE RELOCATION
STORMWATER MANAGEMENT
STORMWATER MANAGEMENT
STORMWATER MANAGEMENT
POTENTIAL RETAINING WALLS
SCREENING FENCE
SCREENING FENCE
SCREENING FENCE
TYP. 50' LANDSCAPING BUFFER AREA
TYP. BUILDING, PARKING, DRIVEWAY AND LOADING SETBACK
TYP. 50' LANDSCAPING BUFFER AREA
160' BUILDING, PARKING, DRIVEWAY, LOADING AND PARKING SETBACK
R1 ZONING
R1 ZONING
180' BUILDING, PARKING, DRIVEWAY, LOADING AND PARKING SETBACK
Riparian Buffer
TYP. SLOPES 15% TO 25% (COND. USE TO DISTURB)
Possible Waters of the U.S.
TYP. SLOPES >25% (NO DISTURBANCE)
Riparian Buffer
U.T. S.G.V.R.
TYP. 50' LANDSCAPING BUFFER AREA
TYP. BUILDING, PARKING, DRIVEWAY AND LOADING SETBACK
LI ZONING
GRAVEL PIKE (S.R. 0029)
50' BUILDING SETBACK
LI ZONING
20' LANDSCAPING BUFFER AND PARKING, DRIVEWAY AND LOADING SETBACK
TYP. 50' LANDSCAPING BUFFER AREA
100' BUILDING, PARKING, DRIVEWAY AND LOADING SETBACK
VCR ZONING
VCR ZONING
GENERAL PLAN NOTES
OWNER INFORMATION
SKETCH PLAN
PROPOSED DATA CENTER
HANOVER DEVELOPMENT LP
Horizon ENGINEERING
01 OF 01