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September 12, 2025

Via iWorq Portal Submission

Director Kevin Whaley
Town of Plainfield – Planning
206 W. Main Street
Plainfield, IN 46168

Re: “Metro Air Business Park – Phase 2, Buildings 8 & 9” Project Narrative for Text Amendment to Plainfield Ordinance No. 47-2018

My Client/Tenant:	C.H. Robinson
Property Owner:	Aireit Plainfield DC II, LLC
Facility Address:	4241 Plainfield Road, Plainfield, IN 46231
PUD Ordinance:	47-2018
Parcel ID:	32-09-32-275-003.000-012

Dear Director Whaley:

The undersigned with DREWRY SIMMONS VORNEHM, LLP serves as counsel to C.H. Robinson (“Robinson”), a tenant of a large logistics complex located at 4241 Plainfield Road, Plainfield, IN 46231 (the “Facility”). The Facility falls within the classification found under Plainfield Town Ordinance No. 47-2018 “Planned Unit Development Metro Air Business Park – Phase 2” (the “PUD”). Robinson is formally seeking a Text Amendment to Plainfield Ordinance No. 47-2018. Please consider this Robinson’s Project Narrative statement to be included in its Text Amendment Packet.

Purpose:

Robinson is seeking a Text Amendment for the Facility.¹ Specifically, Robinson is seeking relief from Section IV(C)(5) of the PUD that requires the following: “Dumpsters or trash compactors shall be enclosed by masonry, brick or pre-cast concrete walls...” (the “Dumpster Requirement”). Robinson requests that it be permitted to maintain and operate two (2) trash compactors along the loading docks on the eastern side of the Facility without incurring further effort and expense associated with construction of permanent enclosures. The permanent enclosures, if required, will have a negative, direct impact on Robinson’s use and the overall safety of the Facility.

¹ The Owner, Aireit Plainfield DC II, LLC, has been involved in this process and consents to Robinson seeking this Text Amendment.

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Proposed Text Amendment:

Robinson requests that the Dumpster Requirement language be amended and revised as follows (additional language in red):

*Dumpster Enclosures. Dumpsters or trash compactors shall be enclosed by masonry, brick or pre-cast concrete walls as approximately depicted on the attached Exhibit H. Such enclosed areas shall be subject to the review and approval of the DRC as part of the Detailed Development Plan approval process. **Notwithstanding the foregoing, any parcel within the PUD that immediately borders the property owned and/or operated by the Indianapolis International Airport is not required to meet the requirements as set forth herein so long as the dumpsters and/or trash compactors: 1) are not visible from any public roadway; 2) are located in a yard, staging area, and/or loading dock; and 3) do not otherwise infringe on the overall style, character, and nature of the parcel. The Director, in his/her sole discretion, may require any entity to meet the Dumpster Enclosure requirements.***

The Facility and Compactors:

The Facility is located in Phase 2 of the Metro Air Business Park at 4241 Plainfield Road.² The Facility is east of the Ronald Reagan Parkway and west of the Indianapolis International Airport (property titled/owned under the “Indianapolis Airport Authority;” the “Airport”). In fact, the Facility sits directly adjacent to the Airport’s northern runway and its solar field. The Facility sits directly on the border with Marion County:



² Some documents have an alternative address of **4132 Plainfield Road**. However, 4241 Plainfield Road is the Robinson Facility and is also called “Building 9.”

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The trash compactors are located along two (2) of the loading docks on the eastern side of the Facility. Again, this area is adjacent to the Airport’s runway/lighting systems, the Airport’s solar field, and the White Lick Creek. Thus, it is highly unlikely that any future development will occur on the eastern side of the Facility³ which should alleviate any aesthetic concerns associated with having the compactors onsite sans any enclosures. Below is the area in-question:



Below are photographs of the two (2) trash compactors at the Facility. The compactors are removable (non-permanent) and are affixed to loading docks that were built to receive commercial trailers; thus, the compactors can be removed from the docks to accommodate additional trailers, if necessary. This is crucial to Robinson’s activities at the Facility. Robinson needs the flexibility to remove these compactors to access the docks when there is an increase in demand and/or when other docks are offline.

³ It is worth noting that the vacant parcels directly east/southeast of the Facility (within Hendricks County) are owned by the Airport. It can be assumed that the Airport Authority will retain ownership of these parcels given runway protection zone requirements. The undersigned has not reviewed the runway protection zone requirements for the Airport, but presumes that the Airport has a legitimate interest in limiting development immediately adjacent to the runway.

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Zoning Ordinances:

The Dumpster Requirement in the PUD states as follows:

Dumpster Enclosures. Dumpsters or trash compactors shall be enclosed by masonry, brick or pre-cast concrete walls as approximately depicted on the attached Exhibit H. Such enclosed areas shall be subject to the review and approval of the DRC as part of the Detailed Development Plan approval process.

Permitting the Text Amendment to revise the Dumpster Requirement (for those similarly situated facilities, like Robinson, that directly abut the Airport): 1) does not involve an increase in intensity of the PUD; 2) does not involve the designation of an additional land use; and 3) will not adversely impact the purpose or intent of the overall development.

Robinson’s Position:

Revising the Dumpster Requirement will relieve Robinson and other similarly situated facilities within the PUD from the requirements that are detrimental to its operations. The eastern loading dock of the Facility directly abuts the Airport’s runway zone and solar field. There are no concerns about Robinson “screening” the compactors because they are shielded from public view. This is due to the fact that: 1) the compactors are behind the Facility abutting the runway; 2) the compactors are screened with vegetation near the public parking areas (only after you enter onto Facility property); 3) there are no publicly accessible streets behind the Facility; and 4) the likelihood of future development along the eastern (back) side of the Facility is highly unlikely given that it is extremely close to the runway and owned by the Airport.

To help further illustrate the site and current location of the compactors, please see the attached **Exhibit A** which is a photo array of different angles and locations around the Facility. This array further demonstrates how concealed the compactors’ current locations are from public view. Examples below:

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Robinson takes the position that this Text Amendment will not adversely impact the overall character, nature, and intent of the PUD. First, this request does not involve or require an increase in intensity at the Facility. Second, this request does not involve the designation of an additional land use or request for a change in the zoning classification. And third, this request will not adversely impact the purpose or intent of the Metro Air Business Park Development. The revised

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language, as proposed, is narrowly tailored to just those facilities that directly abut the Airport and its facilities.

Robinson avers that the (perceived) intent of the Dumpster Requirement is for aesthetic and uniformity purposes within the Development. Robinson’s request for relief from the Dumpster Requirement only applies to the eastern loading dock area which is completely out of public view as shown in the array of photographs produced (Exhibit A). There are no concerns about future development along the eastern loading dock because of the extremely close proximity to the Airport’s runway zone. Simply put, this area is an outlier within the Development and there is no perceived harm to other sites or the general public. The request does not violate or interfere with the PUD’s intent.

The compactors are necessary for Robinson’s ongoing operations at the Facility. Robinson needs quick and effective access to the compactors in order to keep operations moving. Enclosing the compactors, if required, will likely hinder Robinson’s ability to use the compactors. They are maintained regularly and are emptied out multiple times per week. Requiring additional masonry and walls around the compactors will unnecessarily hinder Robinson’s ability to access the compactors for their regular pickups. This point is further exacerbated by the fact that the fire suppression intakes to the compactors, wherein fire hoses are fed to put out any fires within the compactor *itself*, are located on the sides of the compactor; if masonry walls were to be constructed around the compactors, this would make access to these fire suppression intakes more difficult. The additional time and effort required to get around the masonry could result in additional loss to Robinson/the Facility that could be mitigated with quick, efficient access to the intakes.

Further, the compactors have been modified to fit within existing loading docks on the site. Robinson does not want to foreclose its ability to use the docks, where the compactors currently sit, for other purposes (i.e.- unloading/loading of commercial vehicles). If Robinson is required to follow the Dumpster Requirement and, in the near future, needs to remove the compactor(s), Robinson will be required to remove all of the installed masonry and other components. This will add significant cost, time, and expense if Robinson is required to install the additional masonry walls around the compactors and later is forced to remove them for spacing within the loading dock.

Lastly, the Dumpster Requirement is costly and outweighs any potential impact. Initial quotes obtained by Robinson to complete the masonry requirements have ranged from approximately \$50,000 to \$75,000+. These costs are significant to Robinson, especially in light of the other points/issues raised in this letter. Along these lines, Robinson would be amenable to further vegetation screening or other less-costly/less-intrusive measures, if necessary.

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Conclusion:

For the reasons stated herein, Robinson requests that the Town of Plainfield approve its requested Text Amendment to permit relief from the Dumpster Requirement to those facilities that meet the criteria as-proposed. Should you have any other questions, comments, or concerns, please do not hesitate to contact our firm at 317-580-4848 or enorris@dsvlaw.com. Thank you.

Sincerely yours,

DREWRY SIMMONS VORNEHM, LLP

/s

Evan M. Norris

cc: Will Kelley, DSV
Maria Zaffke, CHR
Summer Comer, CHR
TJ Sullivan, CHR

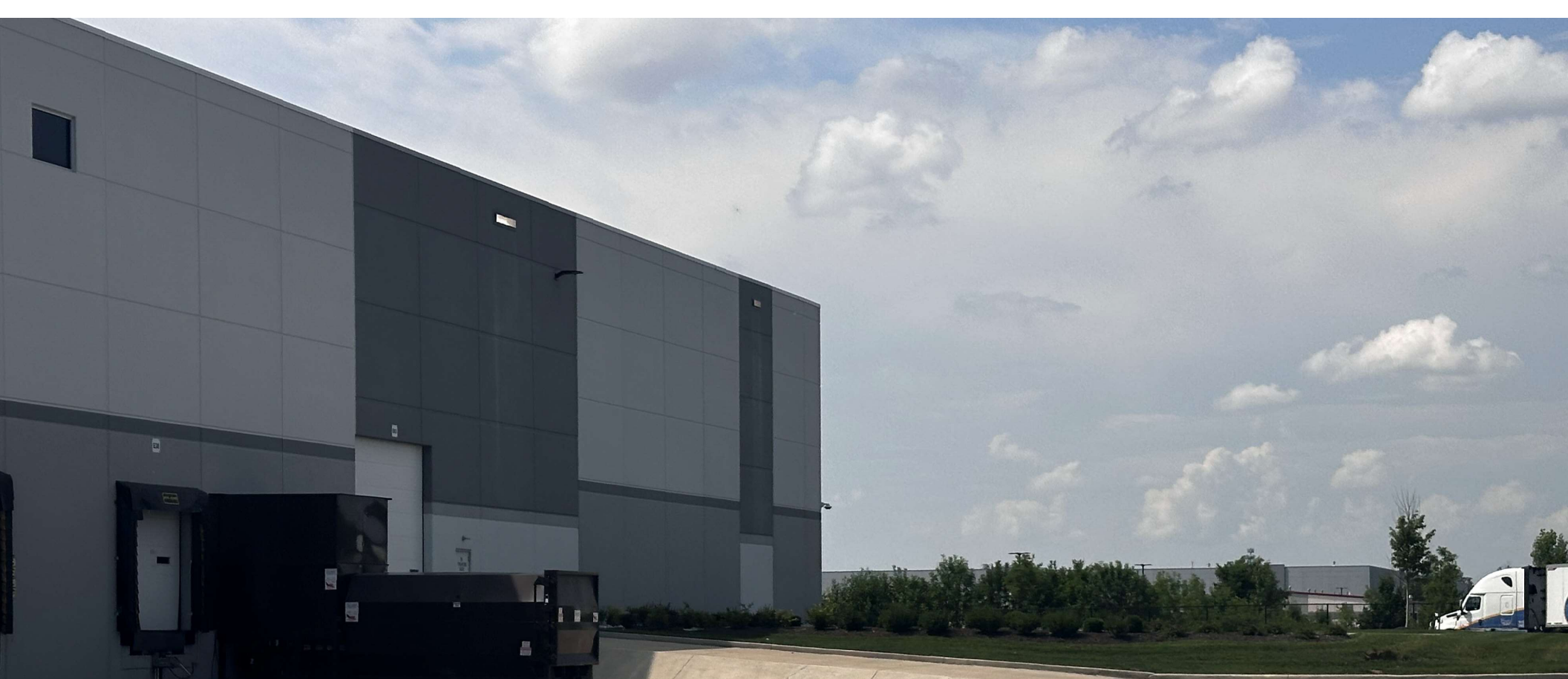
EXHIBIT A



**Around the corner - 200 ft -
No public access**



Further up Plainfield -
Employee parking



End of Yard





Coming inside gate
from parking lot



Inside parking lot - East side from Plainfield Rd



**Opposite view
from inside yard -
no public access**





**View from Stafford Dr
and Plainfield Rd -
looking at front of
building**



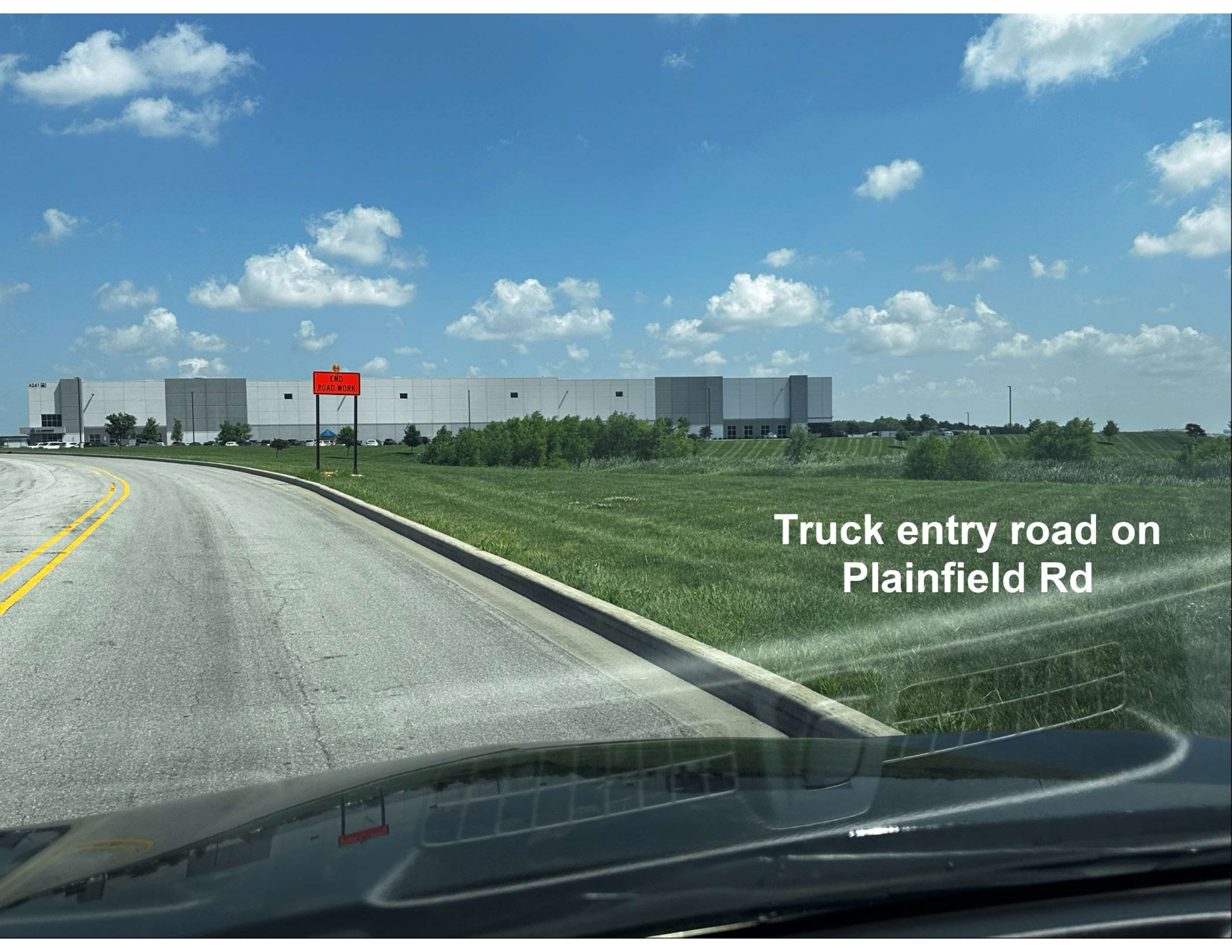
THIS IS NOT AN
ENTRANCE
EXIT ONLY

4241

STOP



Truck Entry from North West side



END
ROAD WORK

Truck entry road on
Plainfield Rd





**View from Knight - Trucking co
next door**

