

26 Nov 2025

Town of Plainfield Board of Zoning Appeals  
c/o Department of Planning and Zoning  
206 W Main Street  
Plainfield, IN 46168

**Subject: Variance Request for Town of Plainfield Zoning Ordinance Section 4.16.G.3 for Proposed RadiusDC Data Centers at AllPoints 18 and 19**

To the Honorable Members of the Board of Zoning Appeals:

RadiusDC is submitting this petition for a variance from the requirements of the Town of Plainfield Zoning Ordinance, specifically Section 4.16.G.3, in connection with our proposed data center development located at the southeast corner of Smith Road/S 900 E and Allpoints Parkway.

**1. Project Description and Purpose**

RadiusDC is proposing a high-efficiency data center. The design optimizes space utilization while adhering to the critical functional and safety requirements inherent to data center operations. A key component of this design is the placement of essential, large, and heavy electrical equipment, including transformers, medium voltage switchgear, and engine generators for backup power, in a dedicated, screened equipment yard parallel to the main data center building.

**2. The Variance Requested**

We are requesting a waiver of the equipment storage limits and/or location restrictions in Town of Plainfield Code 4.16.G.3 that may otherwise prohibit the placement of more than 10% of building area to be placed in the proposed exterior location. Our equipment yard layout is based on efficiencies with building operations and connections with local utilities. This dedicated area includes support generators during emergencies and the electrical equipment necessary for connections with the local utility providers. RadiusDC requests a waiver allowing up to 50% of building area for Allpoints 18 and 19.

**3. Justification for Hardship (Variance Criteria)**

Indiana law and the Town of Plainfield ordinances require that a variance be granted only upon a finding of practical difficulty or unnecessary hardship, which must meet specific statutory criteria. RadiusDC asserts that the following unique conditions of the property and the nature of the use justify the variance:

- **Unique Physical Conditions:** The highly specialized and heavy nature of data center electrical infrastructure requires ground-level, exterior placement. The sheer size and weight of industrial transformers, switchgear, and engine generators make them uneconomical, impractical, and, in many cases, structurally unfeasible to place on a rooftop or inside the primary structure.
- **Essential Functionality and Public Safety:** This equipment is critical for the continuous and safe operation of the data center, including essential backup power in emergencies and the communications enablement which data centers provide. Exterior placement, within a secured and appropriately screened yard, allows for necessary safety setbacks, proper ventilation, maintenance access, and fire suppression protocols that might be compromised by internal placement.
- **Minimal Detriment to Public Welfare:** The equipment yard will be professionally designed to include comprehensive screening fence to mitigate visual impact on adjacent properties or public rights-of-way. The variance will not be injurious to the public health, safety, or welfare of the community.
- **Consistency with Intent:** Granting this variance allows the development of a state-of-the-art data center, a vital commercial use for the Town of Plainfield, while upholding the general intent of the zoning ordinance to ensure aesthetic standards through the proposed screening measures.

**4. Conclusion** RadiusDC requests the Board of Zoning Appeals approve this variance. The unique operational requirements of a data center present a genuine practical difficulty in adhering to the strict letter of Section 4.16.G.3 for the placement of critical electrical infrastructure. The proposed solution is the only economically viable and functionally sound option, and it includes substantial mitigation efforts to ensure compliance with the spirit and intent of the Town's code.

We are prepared to present detailed site plans and architectural renderings of the screening to the Board at the scheduled hearing.

Sincerely,

Keith Klesner, PE

VP of Development

RadiusDC