

November 18, 2025

Mr. David Culver  
Land Use General Manager  
NCC Department of Land Use  
87 Reads Way  
New Castle, DE 19720

**RE: White Clay Center Industrial Park  
Major Land Development Plan - Exploratory Submission  
100 White Clay Center Drive  
Newark, DE 19711  
Tax Parcel Numbers 09-021.00-016, 09-021.00-028, 09-021.00-029, 09-021.00-030, 09-021.00-031, 09-021.00-034, and 09-021.00-035  
Verdantas Project #38702**

Dear Mr. Culver:

On behalf of our client, SWC 100, LLC ("Applicant"), we respectfully submit this correspondence in connection with the Exploratory Plan for the proposed White Clay Center Industrial Park ("Application"). Enclosed are the submission requirements as outlined in Appendix 1 of the Unified Development Code ("UDC" or "Code") as shown in Exhibit 1.

The subject property is approximately 44.08± acres, consisting of seven (7) tax parcels located on the south side of Ogletown Road, immediately east of the corporate limits of the City of Newark. The proposed plan contemplates the demolition of seven (7) existing structures and the comprehensive redevelopment of the site as an industrial park consisting of three (3) new buildings with a combined gross floor area (GFA) of approximately 848,300 square feet situated on two (2) parcels.

The site is zoned I (Industrial). The proposed use is defined as *Information Services* (NAICS 51) pursuant to Section 40.33.270.D of the UDC. As you know, this Light Industry use category is permitted *by-right* (i.e., designated with a "Y" in the table) as confirmed in the adopted UDC Table 40.03.110.B. Accordingly, the proposed development fully complies with all applicable use standards and requirements of the UDC.

As a defined *industrial establishment*, parking calculations are based on a minimum of five (5) spaces plus 0.5 spaces per 1,000 square feet of gross floor area (GFA), as required by Table 40.03.522 of the UDC. Note that our research has confirmed that data center parking demand is far less than for other industrial uses of a similar size. See, e.g., "*Parking requirements for all data centers*", Urban Land Institute - ULI Americas data Center Product Council (2024), [https://knowledge.uli.org/-/media/files/research-reports/2024/uli-data-center-whitepaper\\_hm\\_2024-11-12\\_final-final-round.pdf](https://knowledge.uli.org/-/media/files/research-reports/2024/uli-data-center-whitepaper_hm_2024-11-12_final-final-round.pdf). However, if the Department were to disagree with our proposed parking calculations for any reason, our client may seek to perform a PDNA for the Department's consideration and/or otherwise seek any necessary variances as permitted by applicable law.

There are no known deed restrictions that New Castle County is a party. Sanitary Sewer Feasibility is shown on the Exploratory Plan. There are no delinquent taxes or fees for the subject parcels.

Included in the submission is the Traffic Information in accordance with Article 11.

Finally, please note that the Application will comply with Section 40.26.260 of the UDC, which governs site design and architectural standards for large industrial structures.

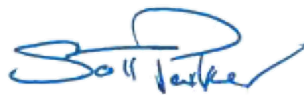
We appreciate the Department's time, attention, and cooperation in reviewing this Application. Should you require any additional information, documentation, or clarification, please do not hesitate to contact me directly.

Sincerely,



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**K. James Taylor, Jr., PE**  
Associate Vice President



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**Scott Parker, PE**  
Senior Project Manager

CC: SWC 100, LLC

# Exhibit 1



*Exploratory plan.*

1. Planning.
  - a. A completed application form.
  - b. The applicable filing fee in accordance with Appendix 2.
  - c. Four (4) folded paper prints at submission. Twenty (20) folded paper prints three (3) weeks prior to: 1) County Council rezoning ordinance introduction; 2) Planning Board public hearing; 3) County Council rezoning hearing.
  - d. One (1) copy of any deed restriction to which New Castle County is a party.
  - e. A wetlands report.
  - f. One (1) print of the most recently recorded subdivision or land development plan for the subject property.
  - g. Site capacity and concurrency calculations.
  - h. A septic system soils feasibility report approved by DNREC. The suitable soils area must be delineated on the plan for verification that the proposed location of the disposal field does not encroach upon any limiting feature (i.e. riparian buffer, wetland, floodplain, lot line, etc.).
  - i. Sewer feasibility plan for plans that contemplate connection to the County sewer.
  - j. All current County taxes, school taxes and sewer service fees must be paid or not delinquent at the time of application.
  - k. Photographic proof of posting and signed affidavit in accordance with [Section 40.31.320](#) of the County Code.
  - l. All other information and items required by [Section 40.31.113](#) of the County Code.
  - m. Digital CAD file for the plan in a format acceptable to the Department.
  - n. If not previously completed as part of a Pre-Application Sketch Plan, a Site Analysis plan pursuant to Appendix 1(3)(K).
  - o. A Conceptual Landscape Plan that generally delineates all planting areas and planting requirements in accordance with this Chapter.
  - p. Conceptual architectural renderings of proposed site development shall be required for all rezonings and major land development plans.
2. Engineering.
  - a. One (1) copy of the exploratory plan.
  - b. The applicable engineering filing fee in accordance with Appendix 2.
  - c. One (1) copy of the engineering exploratory requirements in accordance with the Engineering Submission Requirements in Appendix 1(2)(B).
  - d. One (1) copy of the Department's approved Engineering Checklist—Exploratory Sketch Plan, signed and sealed by the responsible design professional in charge.
3. For land development applications that contemplate connection to County sewer, a letter from the Department of Public Works indicating that sewer capacity is or will be available for the proposed development.
4. The Land Development Improvement Agreement (LDIA) Information Sheet (may be submitted any time prior to recordation). The sanitary sewer agreement will not be executed until the sewer design plan is approved and the required sanitary sewer easements have been recorded.
5. For sewer only plans, the sanitary sewer agreement will not be executed until the sewer design plan is approved and required sanitary sewer easements have been recorded.

