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March 4, 2012

Parkland County
Planning and Development
53109A HWY 779
Parkland County, Alberta T7Z 1R1

Attention: Christina Kortmeyer, RPP, MCIP
Planning Officer



Dear Ms. Kortmeyer,

Re: Fawn Meadows Outline Plan and Accompanying Bylaws

The following is a summary of changes that have been made to the Fawn Meadows Outline Plan and the proposed Bylaws to amend the Parkland County Municipal Development Plan, Jackfish Mayatan Lakes Area Structure Plan and Land Use Bylaw. Commentary and response is also provided to the Parkland County letter dated February 22, 2012.

It is our understanding that we cannot submit an amended bylaw as first reading has been given, so our response to the bylaw recommendations from Administration is limited to amending the draft bylaws as they currently stand prior to consideration of second reading.

Outline Plan:

The amendments are in accordance with discussions and correspondence received from Parkland County since and including 2010.

Except for cosmetic amendments, documentation highlighting the changes made to the Outline Plan are provided as an attachment to this Plan. Each change is referenced by section number. Note that due to the extent of the proposed amendments, referencing items by page numbers will vary between this version and previous versions.

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Jackfish Mayatan Lake Area Structure Plan:

A question was brought forward in the report to Council (February 2012) regarding mini-storage. It was noted that the mini-storage was currently limited to industrial and warehousing type land use districts and that the proposed use would not be appropriate within a country residential setting in the opinion of Administration. In this regard, it should be noted that the primary objective for the mini-storage was to store motor homes, boats and to provide additional storage space for residents rather than cluttering up the residential sites within Fawn Meadows. To meet this objective, it is proposed that the "mini-storage" be amended to read "residential-storage".

Within the Outline Plan, it is now clearly stated that this storage area will be limited to Fawn Meadows residents and the condominium association. We hope that this amendment will suffice to address traffic and/or commercial concerns arising from this land use. Should Parkland County have a modified wording that would in your opinion, better satisfy our objective, we have no objections to doing so.

All references to "villas" have been changed to "duplex" within the Outline Plan, which should satisfy the concerns of Administration on that matter. The same may be done with the applicable statutory plan and bylaw amendments.

Changing the wording of "senior citizen residential residence" to "supportive living complex" does not pose a problem for the developers of Fawn Meadows.

Amending the water/sewer statement from "In accordance with the requirements of Alberta Environment and Parkland County" to read "all sanitary sewer systems shall meet provincial and Parkland County regulatory and setback requirements is not an issue for the developer of Fawn Meadows. It is assumed that Parkland County will not require a standard that conflicts with provincial standards and provincial licensing requirements.

The issues of parcel density, parcel size and communal servicing is addressed later in this letter.

Municipal Development Plan:

It is noted that the February 2011 report from Parkland County Administration states that the recreational, commercial and residential-storage uses were not considered in the plan. Each of those uses are described in the Outline Plan, both in written form and graphically. It is our position that any further description would be best suited as part of a development permit application. If the reference was towards water/waste-water, this issue has now been addressed appropriately within the text of the Outline Plan.

Regarding the issue of a minimum of 10% of the common lands to be set aside for common space recreational lands, that is not an issue for our client. As can be easily found on the tentative plan provided, much more than 10% of the land is already given for open space and recreational use. The approach taken by Parkland County in the past of placing a deferred reserve caveat on applicable lands as part of the subdivision process may be appropriate at that time for Fawn Meadows.

Land Use Bylaw:

It should be noted that Parkland County's first suggested approach to be taken with respect to zoning (land use district) issues was to create a specific Direct Control District, as is done in surrounding municipalities such as Sturgeon County, Lac Ste. Anne County and the City of Edmonton. This was later changed to a recommendation that the current country residential district format used by Parkland County, with the appropriate amendments, be applied to Fawn Meadows. Due to the nature of Fawn Meadows, this has required an extensive list of amendments.

As a contractor to the Developer, we are unable to fully place ourselves in the perspective of the Parkland County Planning Department to determine with accuracy what the Department would desire for wording and content. On this basis, any suggested rewording by Parkland County that will still accommodate Fawn Meadows in its intended fashion will be acceptable to our client.

- It is suggested that based upon feedback received that mini-storage be amended to read "residential-storage". The definition of mini-storage provided in the proposed bylaw would have to also be appropriately reworded, unless of course Parkland County determines that a definition is not required.
- As per the other bylaws, all references to "villas" may be reworded to read "duplex".
- Regarding lot areas, if desired, the minimum lot area for all uses would be more or less the minimum lot area provided on the tentative plan. Similarly, the maximum lot area would be the largest lot area on the tentative plan (provided). Our approach was to leave this type of lot area to the discretion of the subdivision authority, but any lot area range that provides for the lot descriptions in our submitted tentative plan is acceptable to our client.
- The parcel coverage provided are appropriate for Fawn Meadows as it has been envisioned and designed. The intent is to greatly reduce the amount of private lot space to an extent which would be reasonable for the desired target market. This leaves much more of what would be lot area in a traditional subdivision to common lands which would be maintained and cared for by the condominium associations. Our target market is empty nesters up to supportive living residents. With no children on-site, this market desires a minimum amount of yard and home maintenance responsibilities. In reviewing Fawn Meadows it must be remembered that this is not a traditional subdivision, and in our view should not be compared to traditional or cluster subdivisions designed for family occupation.
- In our view the building pocket requirements are quite clear. Perhaps a solution would be to delete the building pocket from the bylaw as it will also be included as part of the applicable condominium regulations and bylaw. Another approach, if desired, would be for Norcan Group Inc. to prepare an example illustration that would perhaps better explain the building pocket regulation.

- Regarding parking regulations, it is noted that the updated January 2012 proposed land use provisions for Senior's Housing in the City of Edmonton is 0.4 parking stalls per sleeping unit and 0.7 per dwelling unit. It is noted that resident parking within the complex is not as clearly addressed in the draft bylaw as it could be. All single, semi, and duplex dwellings will have a full 2.0 parking stalls per dwelling. It is recommended that Parkland County consider adopting the City of Edmonton standard of 0.4 parking stalls per sleeping unit within the complex as an addition to the proposed bylaw amendment. The City of Edmonton contains a large number of supportive living developments and so their standards would be well worth considering.

Other Comments:

The Outline Plan and the public process to date have stressed the idea that Fawn Meadows is not a traditional or even a typical cluster subdivision. It is a relatively new concept in providing senior and elderly housing to rural residents as an alternative to having them live in an urban area. There are many supportive living facilities in urban settings. Fawn Meadows is possibly a first for rural Alberta.

Fawn Meadows would be far more comfortable a home for rural residents of Parkland County to live in rather than having to abandon their farms or acreages and leave their lifelong home for the city. Response from our open houses has made it clear that people in the surrounding area of Fawn Meadows appreciate the vision and opportunity it will provide when they themselves have to move to a smaller and less maintenance

The complex for supportive living is designed for adults that are pretty much past the driving part of their lives. This is why little resident parking is required and why a community shuttle/bus service is proposed.

Fawn Meadows is not designed nor an appropriate place for family living. The target market, empty nesters to pre-extended care adults don't require or desire large lots and yards which in turn require a great deal of time spent on yard maintenance. Having the lots not much larger within the multi-unit condominium properties results in minimizing the amount of time and effort for residents in home maintenance and yard care while still proving a very real rural setting as a place to live.

It is noted in Parkland County's Administrative report that a communal system for water and waste-water servicing, though appropriate in environmentally sensitive areas and for seasonal use, would not be appropriate for full time use in non environmentally sensitive areas. Being used full time will result in a more robust system than would be installed in a seasonal use location. Also, being used full time allows for a better quality safety and compliance regime as opposed to having the system abandoned for half of the year. On this basis, is there an environmental related reason for Parkland County to not support this proposal? If so, we are prepared to have our engineering consultants respond and address that concern.

Finally, there are a few items of note in the February 22, 2012 letter from Parkland County that requires a response for clarification purposes:

- The Outline Plan has been revised to accommodate/address concerns put forward by Parkland County,
- The fire protection proposal for Fawn Meadows does not include the use of grey water. The only proposed use for grey water is to have it applied for ground water recharge in accordance with an Alberta Environment license.
- It is very premature to obtain a provincial approval for a fire protection plan at this time when the respective buildings have not been designed. For structural fire protection.

Should you have any questions or if you require further information on this project and our response to the Parkland County Administration reports, please do not hesitate to contact us at your earliest convenience.

Yours truly,

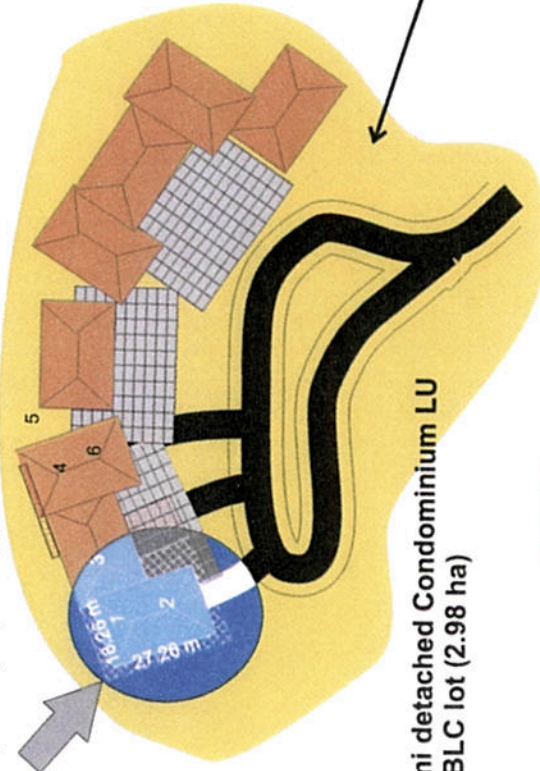
Richard Neufeld

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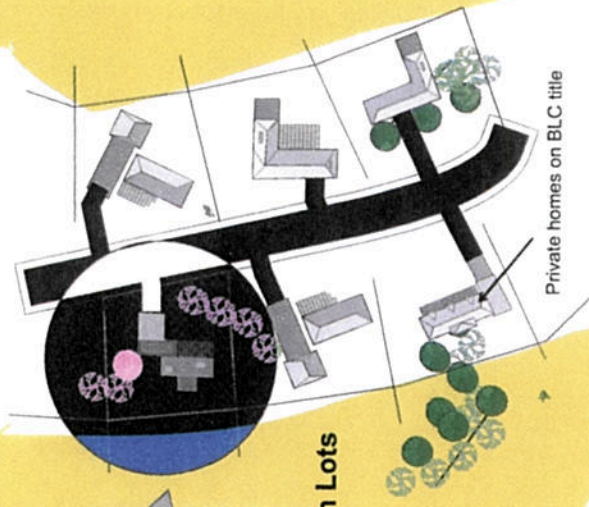
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Building Area (2 LU + garage) = 490.7 m²
 Attached exterior amenity = 273.0 m²
 Total site area = 763.7 m²
 Site coverage building only = 64%



24 Semi detached Condominium LU
 on 1 BLC lot (2.98 ha)

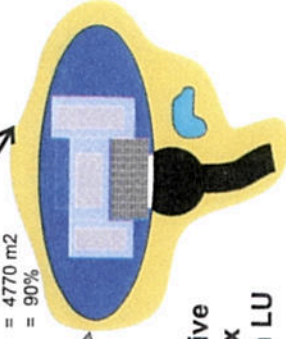
Building Area (1 LU + garage) = 298.0m²
 Lot area = 4600.0 m²
 Site coverage building only = 7%



SF Residential
36 Bareland Condominium Lots

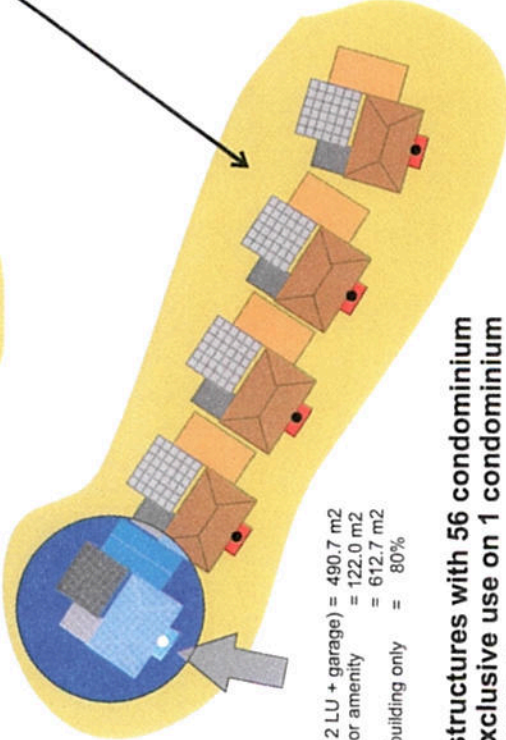
Common Lands

Building footprint = 4270 m²
 Attached exterior amenities = 500 m²
 Total Site Area = 4770 m²
 Building Coverage = 90%



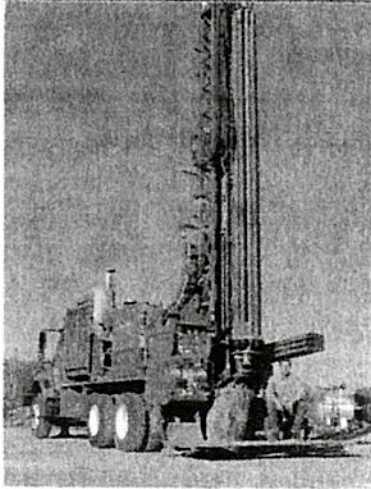
Seniors Supportive
Living Complex
140 condominium LU

Building Area (2 LU + garage) = 490.7 m²
 Attached exterior amenity = 122.0 m²
 Total site area = 612.7 m²
 Site coverage building only = 80%



28 Duplex structures with 56 condominium
titles c/w exclusive use on 1 condominium
lot (3.96 ha)

Site Development Details

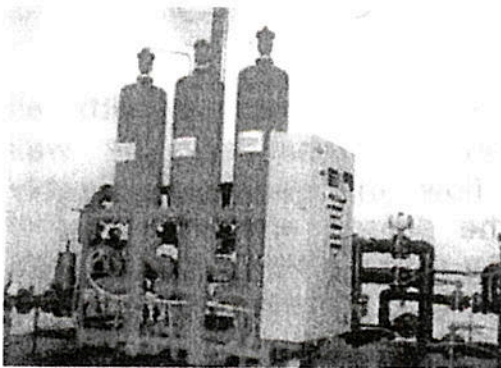


surrounding water wells or other licenses within the aquifer. Fawn Meadows requires considerably less water, 178.4 m³ (39,242.5 gallons) per day. These volumes are based on a 378 litres/day (83 gallons/day) on a per capita basis.

The water and wastewater systems will have limited capacity. Water for domestic use will be provided by two wells located on-site with a treatment and distribution system. This system will supply water to all dwellings on a year round basis.

Commercial use water will result in an additional use volume of 9.83 m³/day (2,162.3 gallons). This represents approximately 1.5% of the sustainable yield.

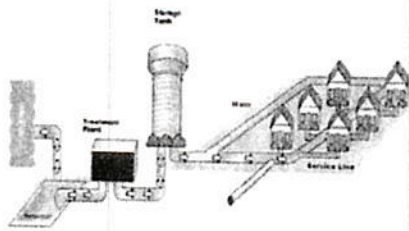
(waste-water treatment)



Wastewater will be serviced by septic tanks located on each lot. The effluent from each septic tank will be pumped to a constructed wetland treatment facility and the treated effluent being disposed of by soil absorption methods.

The wastewater treatment process can be divided into three categories; collection, treatment and disposal. The collection system will consist of the "Septic Tank Effluent Pumping" (STEP) system. The effluent treatment and disposal system is presented by Jacques Whitford NAWA in the appendix.

Two groundwater wells have been installed on the property. The first well was dug on June 12, 2008 to a depth of 73 metres (240 feet) with



a 17.8 cm. (7 in.) well casing. This well is located in the proposed commercial area in the southwest corner of Fawn Meadows.

The second larger well was dug on May 13, 2009 at a depth of 84.4 metres (277 feet) with a 25.4 cm (10 in.) casing. This production well is located near the proposed south-central storm pond.

The larger well is intended to be the primary water supply well.

(pump test results)

Each well utilizes water from the Horseshoe formation. The wells are 244 metres (800 feet) apart.


A 72 hour pump test with a 24 hour recovery period evaluation was performed on the wells. The predicted radius of influence is 1,038 metres (3,405 feet) from the production well, with the primary drawdown radius being approximately 244 metres (800 feet).

(sustainable yields)

It is assumed that as with all residential communities, the well water flow will vary considerably with the season and the time of day. An average flow rate of 0.124 m³/min (27.3 gallons/minute) is expected.

Fawn Meadows residential use will only require approximately 27% of the sustainable yield that is available at peak flows. Commercial flows will add a further 1.5% water usage for a total use of 28.5% of the overall sustainable yield.

(fire supply) Fire protection will be provided by using storm-water retention ponds as "fire ponds". A dry hydrant and access point for a tank truck will be provided with sufficient storage to meet minimal fire standards.

Section 3.4: - Mini-Storage par. (reworded to read as)	<p>The resident-storage area will be fenced with chain link fencing and be no more than 20,000 sq. metres (4.95 acres) in area. The area will be managed out of the commercial centre under condominium association bylaws and regulations. Use of the resident-storage area will be restricted to Fawn Meadows residents and the Fawn Meadows Condominium Board.</p> 
General	All references to "mini-storage" changed to "resident storage".
Section 4.2)	The Direct Control proposal has been changed to a modified country residential district.
(general)	Villa references have been changed throughout to Duplex. Related changes as a result have also been made.
Site Coverage	Site coverage has been updated and/or clarified.

July 2010	Revised
REF: <ul style="list-style-type: none"> A. Preserve and Protect the Environment <ul style="list-style-type: none"> 2nd paragraph 	Natural water features will be protected through the implementation of environmental protections areas including Environmental Reserves and Environmental Conservation Easements.
<ul style="list-style-type: none"> Identify, Protect and Prioritize Lands for Regional Infrastructure 	Not applicable.
<ul style="list-style-type: none"> Minimize Regional Footprint <ul style="list-style-type: none"> amend entire section 	(reworded, see below)
<i>B. Concentrate New Growth Within Priority Growth Areas</i>	
Most new growth shall occur within Priority Growth Areas.	The requirement is not an absolute as it says "Most" rather than "All". As the land is located outside of the metro-Edmonton area, this land is a good candidate for consideration.
Priority shall be given to accommodating growth in major employment areas and in locations that meet at least three of the following four criteria:	
a. Existing and proposed multi-mode movement corridors, including transit nodes	
b. Adjacent to existing and proposed major employment areas	The proposal will benefit by accessing local employment from area residents. It is not a major employment area, however, only a few persons are required.
c. Redevelopment and intensification opportunities within existing urban areas	
d. Locations that utilize existing infrastructure and servicing capacity or logically and efficiently extend that infrastructure	
Land Use: Minimize Regional Footprint	Put in the first entry "(iii) The CRB shall review...." and replace it

		<p>with</p> <p>"The land is not within a priority growth area"</p> <p>Blank out all other entries in this section.</p>
LAND USE ISSUE:		COMMENT
<i>C. Allow Growth Outside of Priority Growth Areas</i>		
(i) Allow development outside of the Priority Growth Areas if the following criteria are met:		
a. It is contiguous to existing development		The land is contiguous to multi-parcel country residential subdivisions.
b. It follows the principles and policies of this plan related to the form of development		It follows the said principles.
c. The level of services provided is appropriate to the form of development		The level of service is appropriate.
d. Development in this area will not adversely impact the provision of regional infrastructure required to service the Priority Growth Areas		The development does not require any additional regional infrastructure in excess of what is already located within the area.
(ii) Growth generated by new development should conform to the principles and policies of the CRB plan.		It does conform.
(iii) All municipalities shall be allowed to grow. The cumulative amount and impact of growth outside of the Priority Growth Areas shall be monitored by the CRB.		The impact is minor and in most cases comparable to existing country residential subdivisions.
(iv) Development on or near municipal boundaries shall be compatible and consistent with the policies of the Plan and shall not impede the sustainable delivery of infrastructure.		Not near a municipal boundary.
LAND USE ISSUE:		COMMENT
<i>D. Support Expansion of Medium and Higher Density Residential Housing Forms</i>		

(i) New residential developments shall provide a greater proportion of higher density residential units.	The supportive living complex is higher density and provides a large portion of the residential opportunities within Fawn Meadows.
(ii) Support innovative housing designs and/or built forms within new and existing residential neighbourhoods.	A number of housing requirements within Fawn Meadows will ensure that it is apart from typical country residential neighbourhoods.
(iii) Greenfield developments shall make provision for a mixture of uses including a diversity of housing forms, community services, local retail and employment opportunities.	A diversity of land uses is provided within Fawn Meadows.
(iv) Transit accessibility must be included in the design of all new developments.	Senior's and supportive living residents will have bussing access from Fawn Meadows to urban areas.
(v) This Section does not apply to country residential developments.	Fawn Meadows is accurately regarded as country residential.

LAND USE ISSUE:	COMMENT
<i>E. Support Cluster Country Residential Development</i>	
(i) Country residential uses shall be allowed in designated areas in a clustered form in order to preserve environmental or open space features. Such developments shall utilize communal water and sanitary services. Private communal services may be allowed at the discretion of the Municipality.	Fawn Meadows is a cluster type development which conforms with this objective.

LAND USE ISSUE:	COMMENT
III. STRENGTHEN COMMUNITIES	
<i>A. Create Inclusive Communities</i>	
(i) Encourage and support the establishment of social infrastructure throughout the region.	Fawn Meadows will allow communities to stay together by providing an opportunity for the elderly in the community to remain in the community for a much longer time prior to being forced to move to urban areas for more active care.
(ii) Support initiatives to improve the livability of communities.	Having the elderly remain in the community makes a community much more livable.

(iii) Integrate uses with adjacent developments to improve connectivity and accessibility to local parks, open space, commercial, and community services.	Basic services are available within Fawn Meadows. The lands are adjoining the provincial highway network and is close to the Town of Stony Plain. Bussing service for supportive living residents will be provided.
(iv) Encourage co-location and/or shared use of compatible public service infrastructure, such as education facilities, parks and civic uses.	As much of the land is within a bare-land condominium setting, shared use is emphasised within Fawn Meadows.

LAND USE ISSUE:	COMMENT
IV. INCREASE TRANSPORTATION CHOICE	
<i>B. Support the Expansion of Transit Service in Various Forms</i>	Not applicable.
(i) Expand and extend the level, quality and range of public transportation options available to serve the region.	Not applicable.
(ii) Direct public infrastructure investments to the transit corridors and transportation projects that support regional growth plan policies.	Not applicable.
(iii) Support expanded transit options through investment in alternative transit methods (e.g. designated transit lanes, high-occupancy vehicle (HOV) lanes, and park and ride facilities).	Not applicable.
(iv) Support multi-modal transportation options by providing multi-use streets sufficient to accommodate bicyclists, motorists and pedestrians.	Not applicable.
(v) Support public transportation options that are environmentally friendly and safe.	Not applicable.

LAND USE ISSUE:	COMMENT
<i>B. Maximize Utilization of Existing Infrastructure</i>	
(i) Identify methods to share, consolidate or co-locate infrastructure, such as water and wastewater services, between municipalities to improve	Not applicable.

efficiencies and minimize infrastructure costs.		
(ii) Utilize energy efficient or green building technologies when upgrading or constructing new infrastructure.		May be applied within this site.

LAND USE ISSUE:		COMMENT
VI. SUPPORT REGIONAL ECONOMIC DEVELOPMENT		
<i>A. Ensure a Supply of Land To Sustain a Variety Of Economic Development Activities</i>		
(i) Ensure an adequate supply of land is available for future development of the region's industries and support further diversification of the regional economy.		Not applicable.

LAND USE ISSUE:		COMMENT
<i>B. Attract and Retain Individuals and Families with a Diverse Range of Skills to the Capital Region to Satisfy the Region's Economic Development Goals</i>		
(i) Provide a wide variety of agricultural, commercial, industrial, institutional, research and other employment opportunities to attract and retain a diverse range of people.		Not applicable.
(ii) Provide a wide variety of social, educational, recreational and cultural amenities to attract and retain a diverse range of people.		Not applicable.

LAND USE ISSUE:		COMMENT
<i>C. Support Regional Prosperity</i>		
(i) Support efforts to place economic development opportunities in the most appropriate location in the region.		Not applicable.
(ii) Promote the concept of a "borderless" region and support efforts to place economic development opportunities in the most appropriate		

location in the region for the benefit of all. The purpose of this policy is to promote rational land use choices and efficient delivery of infrastructure and public services, not to limit healthy competition among municipalities to attract economic development.	
(iii) Designate areas to support industrial, manufacturing, trading, and transportation activities and services located in the region.	Not applicable.
LAND USE ISSUE:	COMMENT
<i>D. Position the Capital Region Competitively on the World Stage</i>	
(i) Support and retain vibrant, inclusive communities that attract a diverse range of people to the region.	Fawn Meadows is unique in providing a supportive living opportunity to rural Alberta.
(ii) Provide a wide variety of employment opportunities throughout the region.	Not applicable.
(iii) Support healthy, inclusive, sustainable communities throughout the region.	Not applicable.
(iv) Provide high quality social, educational, recreational and cultural amenities to attract and retain a diverse range of people.	Not applicable.

OTHER TEXT CHANGES

Groundwater Supply (pg. 22): amend to read
<i>(potable water requirements)</i> ¹ A potable water evaluation was prepared by Stantec ² in June 2009 (see appendix). A daily water flow of 662 m ³ (145,619 gallons) is available with a corresponding flow rate of 0.46m ³ (101 gallons) per minute without adversely impacting

¹ All references in this Outline Plan are in metric & imperial measurements.

² The original Stantec report was updated in 2012 by SD Consulting Group.