

**Written submissions – proposed Bylaw 32-2012 Acheson Industrial Area Structure Plan**

Below is a list of written submissions received in regards to proposed Bylaw 32-2012, the Acheson Industrial Area Structure Plan.

**Received: October 3, 2012**

**Via: e-mail**

Paul Hanlan  
Manager Planning  
Parkland County

cc Parkland Council Members

Paul,

Two of my main concerns regarding this draft of the Acheson Industrial Area Structure Plan are the Wagner water recharge zone and traffic flow on RR265 Spruce Valley Rd & 270 Sand Hills Rd.

With the added Industrial development of the lands west of RR265 this will put an additional burden upon the intersections of RR270 and RR265. How does the County plan on handling this? you have told us the Dept. of highways will be putting in an interchange at RR265. The dept. of highways cannot get half the work done they promise now; we all know the interchange is 25 years away at best. In the interim several companies will be requesting development in the area, whether this council or the next someone will allow the development to take place if it is listed as a possibility within the Area Structure Plan. This is when the transportation problem will arise, there is no way you will get large truck traffic safely onto highway 16A from the intersections of 265 or 270. If you close off the intersections then local residential traffic will be trapped, if you leave it open it will be catastrophic.

What logical answer does planning have ?

Building industrial development on the water recharge zone for the Wagner Natural Area west of RR265 is also a bad idea, this will eventually destroy the Wagner natural Area; not to mention Big Lake. Yes, I have heard the argument that rezoning this area industrial will allow better control over the usage. This is flawed logic, if you provide the basis for development someone will come along put in the water/sewer infrastructure eventually and want to develop the area, and yes a council in the future will allow it. Paving over and building upon the land no matter how it is done will not allow the ground water to migrate to the Wagner Natural Area with the same nutrients and natural flow mother nature allows. We have all witnessed similar development ideas that have failed to provide the results expected by the planners. Parkland County presently has 10,000 acres of industrial zoned land in Acheson to develop, how do the residents benefit by paving and building over the water recharge zone for the Wagner Natural Area and possible damaging this delicate eco-structure.

I would ask you to Please rethink this component of the Acheson Industrial Area Structure Plan, zone this area eco-sensitive no development allowed.

This is like the Joni Mitchell song **“They paved paradise and put up a parking lot”**

Regards,

Business owner Acheson & Area Resident Millham Gardens

---

October 22, 2012

Martin Frigo  
Senior Planner – Long Range,  
Planning & Development Services  
Parkland County

53109A Hwy 779  
Parkland County, AB  
T7Z 1R1

Dear Sir;

**RE: PUBLIC HEARING  
ACHESON AREA STRUCTURE PLAN**

I would like the opportunity to speak at the Public Hearing on November 6<sup>th</sup>, 2012, pertaining to the Acheson Area Structure Plan.

I plan to speak from an email dated June 12, 2012, addressed to you and attached to this letter for ease of reference.

I support the proposed Acheson Area Structure Plan posted October 10, 2012 on the Parkland County website, subject to comments on the attached email.

In particular, I would like to cooperate with the County but require the ability to sub-divide the front 10 acres (the buffer zone) from the subject lands and rezone Country Residential, the same as the Milham Gardens properties.

Sincerely,



**From:**  
**Sent:** Tuesday, June 12, 2012 10:16 AM  
**To:** 'phanlan@parklandcounty.com'; 'mfrigo@parklandcounty.com'  
**Subject:**

GOOD MORNING GENTLEMEN

RE: LEGAL DESCRIPTION  
MUNICIPAL DESCRIPTION  
37.01 ACRES  
PARKLAND COUNTY TAX ROLE

LEGAL DESCRIPTION  
MUNICIPAL DESCRIPTION  
40.01 ACRES  
PARKLAND COUNTY TAX ROLE

LEGAL DESCRIPTION  
MUNICIPAL DESCRIPTION  
40.00 ACRES  
PARKLAND COUNTY TAX ROLE

I am the sole owner of the above three properties.

I am looking for a "potential solution" for the separation buffer solution in the proposed new Acheson Area Structure Plan

Outlined below are some ideas for consideration.

I think it very unfair to use all or a portion of my three parcels of land as a buffer between the residences in Milham Gardens and future industrial development to the east.

As I understand Parkland County requires about 160 to 200 meters buffer Zone east of Spruce Valley Road.

I, of course, would like no buffer zone on my property; I would like the full opportunity to sell all or portion thereof for agricultural or in due course industrial.

Two parcels of the land I own are located immediately across the road from Milham Gardens – 52421 and 52425 – RR 265. The home property [REDACTED] – RR 265 is not located across from Milham Gardens.

I provide for your consideration a potential solution that is a win/win solution for all parties.

1. Create a buffer zone on these two properties of say 160 – 200 meters, east from Spruce Valley Road - allow the buffer zone on each property to be subdivided into two parcels of land ranging in size for 3 to 7 acres each – taking advantage of the existing homes, the existing mature planted trees and contours of the land. These four new smaller parcels would have a caveat on title telling the existing and future landowners that these properties are the buffer zone to Milham Gardens and that the County does not intend any additional separation buffer zone between them and the future industrial lands to the east. A caveat / restricted covenant on title for these individual residential properties would also state that these residential properties remain residential in nature (single family dwellings only), with no potential in the future for redistricting to other uses (i.e. commercial, industrial etc). If future landowners would want to sell, the land would need to be redesignated back to agricultural.

2. Take the remaining acreage of approximately 30 acres on each property and consolidate into the remaining parcel of land 52419 – RR 265 – the resultant parcel of land would now be the existing 37 acres plus 30 acres (52421 – RR 265) plus 30 acres (52425 – RR 265) for a total of 97 acres approximately that are designated in the ASP as future business industrial. Place a caveat or restricted covenant on title for those that follow that the future development of those (industrial) lands immediately to the east of the new subdivided lots will have to provide a berm, screening and landscaping of some type as required in the ASP to soften the transition to industrial. This new industrial parcel would also need to comply with all policies in the ASP since it would remain in the ASP boundary.

Access to the new industrial lot would be through the existing road access for 52419 – RR 265.

3. Consideration to changing the zoning from agricultural to country residential should be considered for the new subdivided properties that form the Millham buffer.

4. Under this proposal, the County may want to consider removing the newly created lots from the ASP boundary. This would facilitate compliance with the current ASP (i.e. no new residential subdivisions required), yet still maintain an adequate buffering from future industrial development. The new subdivided lots may be considered as an extension to Millham Gardens.

5. Access for the newly subdivided lots would need to be finalized with Parkland County. The landowner / developer would need to work closely with Engineering Services to ensure all newly formed residential parcels have appropriate access onto Spruce Valley Road. Currently each of the three existing parcels noted above have two access onto Spruce Valley Road.

Thank you for your consideration to the foregoing, I look forward to meeting and discussing these ideas when convenient.









October 25, 2012

Attention: Martin Frigo,  
Senior Planner.

Parkland County  
53109A SH779,  
Parkland County, AB  
T7Z 1R1

Re: Feedback on the Acheson Industrial Area Structure Plan Draft October 2012, version 9 and a request for Public hearing presentation.

Dear Sir:

As per your letter of October 15, 2012, I am forwarding you our concerns on the above study.

I further formally request the scheduled opportunity to speak to these issues at the public hearing Tuesday November 6, 2012 and trust this letter will serve as confirmation of that request.

As a landowners and representatives of a long standing Parkland county family, who now finds themselves in the effective study area, I find several areas very concerning and potentially very detrimental to our holdings.

As I outlined to you I have discussed these concerns with neighboring land owners and they share these concerns.

I summarize concerns in 3 areas:

**1. The study is unfairly waited to the advantage of the large developer. It unfairly restricts the opportunity of existing small land owners through prohibitive policies and standards.**

The overall direction of land use evolution to the Industrial commercial segment is self evident and not disputed. This has been underway for several decades and is regularly escalating in pace.

However, there are many types of industrial commercial needs and activities that need to be addressed and they are ignored in the ASP.

To assume and create long term policy on a basis that all Industrial and Commercial customers require, or must have, full external servicing capacity eliminates a large segment of potential users who would otherwise be attracted to the study area.



Self contained serviced Industrial Commercial developments can be used to serve the small to mid sized industrial player, as well as the larger player who may simply need land holding versus a full menu of costly unneeded services.

These types of partial serviced developments are in widespread use and can be attractive, exciting compliments to an Industrial commercial area. They serve as growth opportunity venues for newer, entry players. They are cost affordable.

The existing study, with its focus on the need for Full Serving prior to development ignores this critical segment and the immediate opportunity and business need they present.

By focusing on the narrow segment of Fully Serviced development the Acheson study creates a Barrier to Entry to new business in the defined study area.

To my reading, the requirement for full water, sewer, gas and electricity PRIOR to any re development potential seems blatantly calculated to impose an unrealistic financial burden on the small developer. It effectively bars their entry to the industrial commercial market place and openly favors the large existing developers. This is “deep pocket” favoritism to large developers at the expense of existing county landowners and potential exciting new players.

## **2. Proposed Staging policy is too simplistic and does not recognize existing uses and precedents.**

There are a number of situations where small industrial commercial enterprises have already entered into the study area. They exist today as commercially viable business entities and set a precedent on the immediate land use. In our case they are immediately beside us and have dictated the use, eliminated other potential uses.

Where this has occurred and been **previously recognized and approved by the county** it should be recognized in the study and serve as existing planning basis precedent for the quarter or section.

The study proposes large scale” staging” which effectively means long term stagnation of any development immediately adjacent to industrial used lands outside of large developer’s hands.

A better way would be to incorporate their standing, and accept complimentary development that would bring all the land holding in the immediate proximity to a higher level of development. This is true staging development versus the arbitrary time thresholds suggested in the study.

## **3.. The study, by aligning itself to the existing Acheson large development model and players, is failing to recognize for fairness to existing land owners.**

It is far too short sighted to allow this to be addressed as” more - of- the- same” development to the existing Acheson development business district.

The requirement for full water, sewer, gas and electricity PRIOR to any re development potential seems blatantly calculated to impose an unrealistic financial burden on the small developer. It effectively bars

their entry to the industrial commercial market place and openly favors the large existing developers. This is “deep pocket” favoritism to large developers at the expense of existing county landowners and potential exciting new players.

There is a logical, fair compromise to this that allows for staged servicing development and recognition of the legitimate industrial commercial segments that use and benefit from this approach.

Further, the servicing requirements outlined in the study could serve to greatly slow down the expansion and development of the Parkland industrial commercial segment forcing business out of the county and leaving large tracks of land unused and uneconomic for generations. This would be a travesty for many existing land holders and force them to sell at uneconomic levels to larger developers or abandon land holdings. The implications on the county could be prolonged periods of stagnant development while other counties capitalize on the need with a broader spectrum of options.

I would close by saying that if these issues can not be resolved I would like to see our property removed from the study area.

[REDACTED]  
[REDACTED]  
[REDACTED]

Landowners. Parkland County.

CC: Paul Hanlan, RRP, MCIP Manager Planning and Development

CC: Paul Vincent, Chief Administration Officer

CC: [REDACTED], President Nelson Environmental Ltd.

CC: [REDACTED], Landowner Parkland County

Hello Martin,

First of all we would like to extend our sincere appreciation to Parkland County staff for meeting with us on several occasions to discuss the pending Acheson Industrial Area Structure Plan and its impact on Osborne Acres.

We have had a chance to review the new Acheson Area Structure Draft and would like to offer the following comments on behalf of Osborne Acres Residents Association.

**Osborne Acres Residents support:**

1. the need to maximize the growth and reap the profits of this prime location for the benefit of all Parkland residents
2. the commitment Parkland County has made in protecting the Wagner Natural Area and its recharge zone in this draft of the ASP
3. We endorse the Study Area A designation, Wagner Natural Area is too significant to risk development that will destroy the sensitive environmental gem that is our neighbor. We must proceed with due care and caution to protect this area for future generations.
4. We fully support independent studies and assessments by qualified hydrologists and related professionals as proposed in the ASP for the Study Area A
5. We support the concept of a regional trail network- connectivity between natural areas and reserves is insightful and a gift to future generations. This concept may be supported by Acheson businesses to improve the work experience of the growing numbers of employees within Acheson as well as country residential families.
6. Amenities like a trail system may help attract more “discerning businesses” to Acheson which in turn would provide a higher revenue stream to Parkland County
7. We overwhelmingly support the landscaping requirements for all new businesses along with more attention given to highway frontage properties. An overlay will ensure the Acheson area have curb appeal from all major transportation routes – put the Park back in Parkland would be a goal to strive for.
8. We appreciate the commercial/ industrial overlay that exists in and around Osborne Acres
9. We support the provision for visual screening for industrial properties facing or impacting residential uses to minimize land use conflicts.
10. We welcome the idea of water and sewer services to our subdivision.
11. We are pleased to have the agricultural open space buffers around Osborne Acres restated in this draft of the ASP and added west of Spruce Valley Road
12. We appreciate the attention placed on storm water management and its impact to Osborne Acres- particularly monitoring Morgan Creek to ensure it flows at pre development rates. We welcome any assistance with Storm water management that impacts Osborne Acres
13. We support maintaining low laying kettles and depressions and where possible storm water areas being managed as naturalized wetlands is a worthwhile objective.
14. We support reducing the amount of impervious materials as part of the development process to maximize groundwater infiltration.
15. We enjoy the two natural municipal reserves that are within our subdivision and are pleased to see them recognized and support them remaining open spaces. They provide a wild life corridor for all kinds of animals and birds that share our habitat.
16. We look forward to working with Parkland County on a naturalization project on the M/R to the east of our subdivision around the Panatoni storm water pond. We would like to see this parcel of land used for a passive recreational area for all who live and work in Acheson.
17. We encourage changes to the transportation corridors throughout the Acheson Industrial Park-
18. We are pleased that ASP recognizes and addresses nuisance issues such as light sound dust and noise pollution and its negative impact in the Acheson area. Giving strong guidelines for all pollution sources including lighting for all new development helps to reduce the conflict between land uses.

## **Outstanding Concerns of Osborne Acre Residents**

### **Traffic Safety in Osborne Acres**

1. Transportation infrastructure is severely lagging behind the manic development witnessed in Acheson-
2. This was identified as a looming problem in the 1997 ASP but we have not seen the implementation of the traffic corridors proposed in 1997 to deal with the expected and desired growth in Acheson. With industrial development infilling right around Osborne the traffic issues are a getting closer to our homes with each passing project.
3. Hi Way 60 and Northview Road is a very dangerous intersection for Osborne Acre residents who must enter and exit at this location.
4. Northview Road itself has become a heavy traffic corridor and the road surface is destroyed by the industrial vehicles usage. It was not constructed to withstand the heavy loads. We currently have construction traffic driving all the way west down Northview Road and exiting on the dirt trail that is RR 264 going south to access the PTI building site.
5. Traffic safety at Northview Road and the Vander well corner is of utmost concern. Near misses at this corner are a daily occurrence where large commercial vehicles view the stop sign as a suggestion only.
6. Industrial traffic racing through our subdivision to shortcut to a major highway is a constant threat for family members who walk, ride and run on the road in front of our homes.
7. We have school buses that cannot get to their waiting students, with trains blocking Hi way 60 and Spruce Valley Road for extended periods of time.
8. Emergency vehicles could be delayed access to our rural homes.

**The proposal from local residents is to follow the suggestions outlined in the 1997 ASP. By removing a portion of Northview Road and exiting Osborne residents via RR 264 to 531A may help reduce some of the safety issues outlined above. If RR 264 was landscaped with boulevard trees to help designate the entrance to our residential subdivision, industrial traffic maybe alerted and diverted.**

**We need a concrete plan/ time line to mitigate the traffic safety issues that are escalating with each new development permit and the volume of traffic it brings. This issue on the east end of the subdivision will be mirrored to the west as Acheson blooms. We need to find a solution to protect the character and safety of our subdivision residents.**

We ask that the planners review these issues and offer an alternate entrance /exit into our subdivision that does not have us competing with the industrial traffic for a share of the road.

### **Traffic Concerns for Acheson**

1. We are concerned about the volume of traffic that will exit onto Spruce Valley Road if all new road proposals in the ASP are installed prior to the interchange on Spruce Valley Road is completed.
2. We are concerned about the safety of entering onto Hiway 16A from Spruce Valley Road- there is a small hill that obstructs the sightline to the east and no significant merge lane heading west which will present traffic issues if the volume increases as proposed in the ASP
3. Anthony Henday has changed the way traffic flows down 16A- it is a continuous flow of traffic that makes merging on and off highway 16 A difficult
4. Closing the exit ramps at the old weigh scales should not occur until such time that alternate exits from the Industrial Park are constructed.

5. Poor transportation corridors may be deemed a disadvantage when prospective buyers investigate the Acheson Area and witness the grid lock that is created when frequent trains block Highway 60.

## **Water**

1. We request Parkland County look at storm water management as it impacts Osborne Acres. Morgan Creek is changing dramatically as it is being used as a major drainage course for the industrial development upstream.
2. One neighbor on the east end of the subdivision is also noting an increase in water /flooding their property.
3. We welcome the idea of bringing sewer and water to our subdivision- we question why the sewer line does not run the full distance of Osborne Drive.
4. As noted in the ASP, Osborne Acre residents rely on wells for our water- the quality and quantity of our water is changing.
5. We ask that Parkland County use some of the revenue from the ever so profitable Acheson Industrial Park to remedy this situation for its long time residents.
6. We are entitled to safe drinking water and had it prior to the industrial development that has occurred all around us.
7. Pollution into the aquifers from industrial neighbors is a safety risk for those of us who rely on well water for drinking

## **Labeling or Signage of our Residential Subdivision**

Our industrial neighbors are often surprised a residential subdivision lurks behind the bluff of trees. Once made aware people live nearby they are often very thoughtful of our existence- we need assistance from Parkland County to clearly labeling our subdivision to avoid land use conflicts.

## **Enforcement**

Enforcement of the 1997 plan was disappointing as discussed at length at our meetings with Parkland Staff – how will this be rectified by Parkland staff and council as we move forward? Does the County have the staff to enforce Acheson Industrial Area Structure Plan and the policies and concepts it mandates?

## **Study Area A**

At one time Serviced Cluster Residential Subdivision was proposed for the lands west of Spruce Valley Road. Will Parkland County investigate this possibility in the proposed study?

## ***Expectations moving forward***

*Osborne Acres has been negatively impacted by the rapid industrial development that envelopes us.*

*With each new development, we are facing an increase in heavy industrial traffic, congested rural roads with parked construction vehicles, more noise, more lights, odors from plant sites, silty water being pumped into our ravines and downstream yards by eager developers anxious to dry there work site- garbage in our ditches and the list goes on. These issues are moving closer and closer to our homes.*

***We need Parkland County to reinvest some of the tax dollars from Acheson back into Acheson.***

*The entirety of Parkland County benefits from the revenue of this industrial park- residents of Osborne Acres have been negatively impacted in every way possible - from safe traffic corridors to safe drinking*



water. We need a commitment from Parkland County staff and Council to mitigate some of these issues for residents in this very old subdivision.

*Diane Kelly for Osborne Acres Residents Association.*

Oct 26/2012

To Town Council:

I phoned the county on Oct 10 to discuss my plans for a r.v. storage park on my property, the development officer suggested that I talk to Martin Frigo on the following Monday. On Monday Oct. 15 I met with Martin who indicated that the current land zoning is agr (agg restricted) and I would need county approval for this sort of development however the future zoning of the property will be under "study area B" to be discussed at town council Nov 6/2012 and possibly passed Nov 30/2012 he indicated that this will make things more challenging to develop a R.V. storage yard because the land will be more restricted for the next 20 or so years. He suggested that we have a meeting with his boss and other development and planning staff to discuss feasible ways to have my R.V. storage yard approved.

My wife and I met with the four County staff on Wednesday October 24/2012 Martin Frigo, Paul Hanlan, Tracy McKay and Ruth Sider were present. I was asked how I am going to be able to meet their regulations for fire suppression and office space and I explained that I will be able to use my home office and provide a dugout for adequate water for fire suppression. The topic of services came up and they indicated that since 1997 any development on the property will require full city services installed by the developer. no matter what the nature of the development. We discovered that the closest city sewer line is 1.5 miles away and developers close to the sewer line refuse to pay for the infrastructure so it is not moving any closer. We also discussed that the city of Edmonton also has a say in what is permissible and the traffic that my 100 unit storage yard might be unacceptable with the current highway and road design and construction. I mentioned that I would be willing to remove the storage lot when the land is ready for more serious development. They explained that the study area B is not the zoning, the land will stay zoned agr and called study area b and in fact all that the liable "study area b" means is that it is the land that the city and county want kept clear of development until they have discovered the best use for it and developed the proper infrastructure to support the proper development of it, they also mentioned that there is a possibility that the city may want to annex the property in 20 or so years and would want it free of development. According to them the label "study area" provides no real change from its current zoning agr and the 1997 requirement to service the property. however should I wish to dispute the restrictions on my land they implied that now would be the time.

I have several issues with the county's actions and plans. First of all this land is my family's biggest asset it is extremely important to us, I found out about this October 15/2012 was told to meet with them Oct 24/2012 and gained a very vague understanding of what this all means for us at that time, based on this loose understanding I am expected to gather my thoughts perform my due diligence and submit my argument by October 29/2012 (5 days) I also work full time. I feel like I have no time for my due diligence in this matter that affects our future and is important to us this makes me extremely angry!

The next problem is that under the current bylaws and due the proximity to services it is not feasible to develop any lands in this area for any sort of small business and the land is not zoned for any sort of large development, the only way that a small business would be permitted to develop the property would be to flip the bill for all of the infrastructure to the property considering that my R.V. storage would generate \$25k a year profit I find this to be a unrealistic expectation considering that there is really no practical need for treated water and sewer in this type of business. I understand that if the

county allows me to do it everybody will want the same right but our land is unique because a large developer who would consider paying for the infrastructure considering the benefit of a large development is not permitted. Which brings me to my next concern the marketability of the property the land it is no doubt a buy and hold piece of property, with most speculative property's you get the privilege of some optional temporary income to help with debt service it is my understanding that comparable property's in the immediate area have the option of generating some in term income other then farming off of there purchase where as here 1.5 miles away from sewer and zoning that permits **absolutely nothing** that is realistic. I know from trying to sell one of my 40 acre parcels this is a huge deal to developers.

I completely understand that the City of Edmonton and the County of Parkland would like to see our land uninhibited and ready for the development that works best for them when the time comes. However I feel that this area is in a unique situation due to its location and the proximity to services and in my opinion the landowners need to have some rights and provisions so that they can have options open to them weather it be small business to help pay the taxes or some competitiveness in the local real estate market. I feel like my hands are completely tied I can't use the land and I can't get rid of it to move on to different opportunity's. I also think that a other town council meeting is necessary to allow some time for me and my neighbors in these study areas to better understand the situation and express other concerns on the matter. In my opinion there has to be some give and take, the 20 or so years it may take to find a appropriate use is a extremely long time to be locked in this predicament!!

Sincerely,

[REDACTED]

Opening greetings and intro of self (Pat Clayton, Past Pre. WNAS)

Picture #1. Cartoon

I open by stating that the WNAS supports bylaws 32 and 33-2012, with caveats. We have worked with Parkland Council and their Administration on a friendly footing since 1983 and have taken part in all Open Houses and Planning sessions.

Brief history. The land known as the Wagner Natural Area was purchased from Bill Wagner in the 1960s by a consortium of bird lovers and outdoor enthusiasts who included the late Edgar T. Jones. It was then turned over to the Province which declared it a Natural Area in 1976, recruited the Society as Stewards and then leased it to the Society in 1983. So we think worth noting here is that Wagner Natural Area was widely acknowledged for its intrinsic worth long before the Acheson Industrial Area was more than a gleam in Council's eye.

Picture #2. Recharge Area

Bylaw 32. Boundaries of AASPlan#9. Changing the Acheson boundaries westward to Atim Road was rejected 5 years ago following a public uproar. This 2012 change of the same area to Special Study Area "A" gives hope to WNAS. We are confident that additional scientific study will confirm the scientific work that has already been done by Dr. Ben Rostron of the U of A and look forward to this confirmation. Hopefully monies can be found to extend the study area outside the current boundary so that everyone will know what is at stake. (Dr. Rostron's colleague will expand on this)

This recharge area, as defined in the AADrainage Plan, is extremely important to the health and viability of the fen. The Society has emphasized again and again that this is a fact and those who choose to ignore the implications and go ahead and develop within its known boundaries have to abide by any restrictions eg. Land covered by Bylaws 44 and 45 -2009.

The Society has a proprietary water license which is reason enough for it to protect the fen's interest (My colleague will expand on this)

Studies carried out by accredited hydrogeologists will also be essential for areas already marked as Industrial before any future below surface work is carried out - infrastructure such as roads, water lines, sewer, footings for buildings and major power pole lines. The Society has a vital interest in checking that these studies are professionally carried out. Alberta Transportation has been known to change its straight line routes in the past when presented with more acceptable alternatives

In addition to our concerns about groundwater, please note that Parkland's 2004 Land Acquisition criteria include areas that perform a vital environmental, ecological or hydrological function such as aquifer recharge; Contain significant, rare or endangered species; Provide an important linking function and permit the movement of wildlife over considerable distances; Have histories of significant research.

All of these apply to Wagner even if it is not privately held but is instead a valued area of Crown land. The Study Area could confirm this to Council's satisfaction and hopefully to future protective action.

Picture #3 Acheson West

When Council follows the Capital Regional Board's designation of Acheson as a priority Growth Area and zones land accordingly, the map makers lose sight of the intrinsic value of green

spaces in an Industrial setting. This Google 2008 air photo map showing the industrial landscape of West Acheson (with Consor development to the west as still brown ploughed land). It is the kind of gravel and concrete desert most people would not like to see. This is truly "sterilized" land. The much abused Morgan Creek, which runs through Wagner, is the remaining green strip into which surplus water is allowed to pour - notice there is no water retention ponds in this older part of Acheson West.

It has taken much hard work and persuasion on the part of the Society to ensure that all other more recent developments in the Acheson area have suitable water retention and screening ponds.

Picture #4 Map pg 70 draft #9

Another area that is classed as Industrial is the strip along TWP RD 531A which is fen land, wet and low lying with some rare plants. Why is it Industrial when anyone in their right mind can see that just wouldn't work being too narrow and backing onto the Osbourne Acres Buffer with difficult access on to the road.?

Bylaw 33. Cleaning up the plethora of outdated bylaws regarding actions in what is now the expanded Acheson Area,

Easel: Aerial View of Wagner

Regarding 33-2012 Item 10 ( c ) we were pleased to see that the 80 acres we know as the Nature Conservancy's Wagner Natural Area Extension has been reinstated as part of the Natural Area. It had a bylaw, 02-2006, acknowledging its existence as an Outdoor Recreation Area - same as Wagner and a part of Wagner. In 2009 in changing from ODR to Conservation Area , Bylaw 20 - 2009, it quietly disappeared from the County maps and was apparently re classed as Residential It isn't even suitable for agriculture or residential. It is this kind of appearance and disappearance without warning that has the Society concerned about future promises of protection and the worth of the Natural Area to the image of the County. Sorry to sound so negative but as a Society we have been burned too often to have any lasting faith in promises. Constant vigilance on our part will still have to be the order of the day or we may wind up with this.

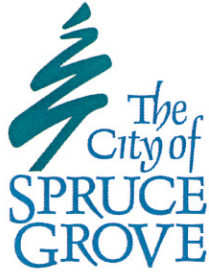


Picture #1 Cartoon again

I repeat. The Wagner Natural Area Society is in favour of Special Study Area A as we feel that, with proper oversight, it gives the best chance of protection to the Natural Area while allowing for some non intrusive development in the future..

Thank you for your time and patience in listening to our presentation.

\*\*\*\*\*



October 29, 2012

Parkland County  
Planning & Development Services Branch  
53109A SH 779  
Parkland County, AB, T7Z 1R1

Attention: Martin Frigo

**Re: Proposed Bylaws 32-2012 (Adoption of the Acheson Industrial Area Structure Plan) and 33-2012 (Amendments to the Municipal Development Plan Bylaw 37-2007)**

Thank-you for your 12 October 2012 referral of proposed bylaws 32-2012 and 33-2012. The City of Spruce Grove appreciates the opportunity to comment on the proposed changes as a significant area of land in the tri-municipal region is impacted. While the City is supportive of some elements of this ASP and recognizes that an attempt was made to incorporate feedback it provided to Parkland County administration on earlier drafts, some concerns remain.

*Interface with Spruce Grove & Wagner Natural Area*

- The City welcomes the ASP's focus for joint planning of the boundary interface areas and the designation of area adjacent to Spruce Grove as Special Study Area A. The City looks forward to working with Parkland County to ensure an appropriate transition between residential and non-residential land uses and adequate protection of the Wagner Natural Area.
- The City was pleased to see the draft ASP identify protecting the Wagner Natural Area and its recharge area as a priority. This is a significant provincial resource.
- Given the sensitivity of Wagner to changes in water level, the City would encourage the County to delay industrial development within the known recharge area as long as possible. This includes the area adjacent to Spruce Valley Road which is currently identified as 'S2-Near Development' in the plan. Slowing down any development in this area will ensure the County has adequate time to undertake the required environmental studies to ensure Wagner remains a sustainable natural area.

### *Land Use Patterns and Staging*

- This is an extremely large plan area. The absence of detail regarding future land use (or specific precincts for different types of development) combined with the large area designated as 'Industrial Commercial' makes it challenging for adjacent communities to gain any understanding of how this area will develop in the long run. Language within the plan references this area as containing light and medium industrial as well as supporting commercial and retail uses. These are dramatically different uses that place different demands on services and the flow of users and employees. It is uncertain how these two land uses will be integrated and where each type of development will be directed. The City would welcome further definition in this regard to allow us to provide informed comment on the proposal.
- Related to this, given the long-term nature of much of the planned development (based on the phasing plan and constraints) and the lack of definition within the Industrial Commercial designation, the City would support land within phases S3 and S4 being designated as Industrial Holding. This would clearly indicate that the intention is for these areas to eventually develop as industrial and/or commercial uses while reinforcing the long-term nature of this development. This change would more accurately reflect the anticipated land use patterns over the next five years (when the next ASP update is anticipated) while enabling the County to focus on being "market ready" in priority areas.
- The City also would benefit from further clarification in the ASP around the objectives, application, and timing of the Acheson Highway Frontage and Osborn Acres commercial overlays.

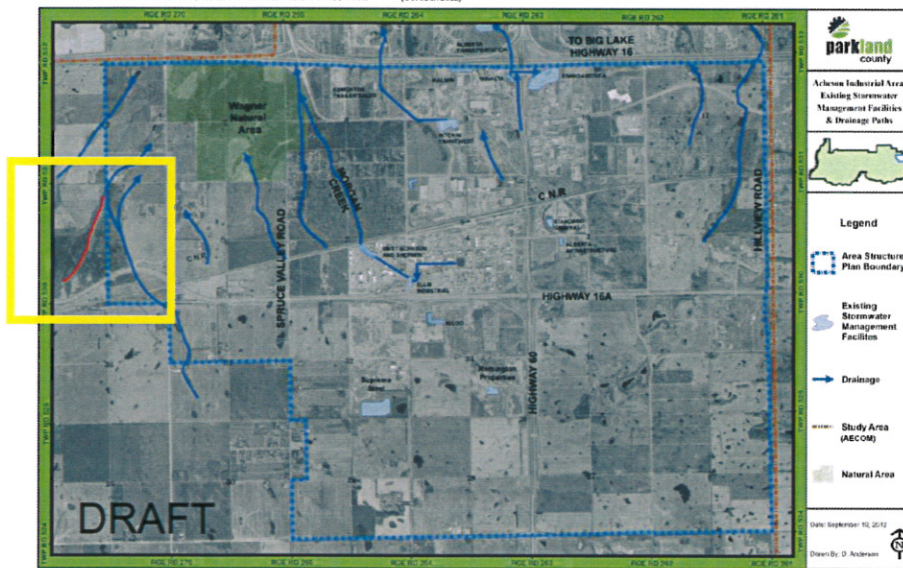
### *Links to Other Plans*

- At this point it is unclear within the ASP what changes (if any) will be made to the Land Use Bylaw and current districting as a result of this plan. Further clarification around future district changes would provide the City better opportunity to comment on potential impacts.
- The City is supportive of the decision to refer the draft ASP to the Capital Region Board. Acheson is both a major employer in the region and home to a significant conservation area.

### *Required Edits & Omissions*

- The discussion on the Pioneer Lands Area Structure Plan (Section 2.3) references a build out of 37,000 units with a population of 10,500 (p.9). The correct figures are 4,364 units and 12,764 residents.
- While the existing SWMF and Drainage Paths map includes drainage patterns outside the ASP boundary, an important drainage route from Spruce Grove's eastern forest stand is excluded. We would appreciate you incorporating the change illustrated on the next page.

FIGURE 9 – EXISTING STORMWATER MANAGEMENT FACILITIES AND DRAINAGE PATHS (OCTOBER 2012)



### CRPWSC Discussion Points

As you are aware, the City of Spruce Grove acts as manager and system operator for the Capital Region Parkland Water Services Commission (CRPWSC). From this perspective, we offer the observation below for your consideration.

- The lack of detail on future use within the Industrial Commercial designation poses a challenge for the Commission in projecting future water use demands. Further clarity around the types, intensity and timing of industrial and commercial development within this area would enhance the Commission's ability to plan for future infrastructure needs or even comment in an informed manner.

We acknowledge the proposed bylaws are still in the process of being finalized and thank you for the opportunity to comment on these through the public hearing process. The City of Spruce Grove looks forward to continuing this discussion and working together to jointly plan for our fringe area.

Please do not hesitate to contact me with any questions or concerns about these comments.

Sincerely,

David Hales, RPP, MCIP  
General Manager, Planning and Infrastructure  
[dhales@sprucegrove.org](mailto:dhales@sprucegrove.org)

cc: Doug Lagore, CLGM, City Manager  
Amber Nicol, RPP, MCIP, Sustainability Planner  
Spruce Grove City Council





# Brazeau County

7401 Township Road 494, P.O. Box 77, Drayton Valley, Alberta T7A-1R1  
PHONE: (780) 542-7777 - FAX: (780) 542-7770  
[www.brazeau.ab.ca](http://www.brazeau.ab.ca)

October 31, 2012

Sheryl Cammidge, Planning Clerk, Planning & Development Services  
Parkland County  
53109A HWY 779  
Parkland County, AB T7Z 1R1

Dear Ms. Cammidge

**RE: Proposed Bylaws 32-2012 – Adoption of the Acheson Industrial Area Structure Plan and  
33-2012 - Amendments to the Municipal Development Plan Bylaw 37-2007**

---

Thank you for referring proposed Bylaws 32-2012 and 33-2012 to our municipality for comment. Brazeau County has no concerns with the amendments as proposed.

If you have any questions or concerns, please contact the Planning and Development Department at 780-542-2667.

Yours truly,

Laurie Johnson  
Planning and Development Manager

LJ/nc

cc: Marco Schoeninger, Chief Administrative Officer  
John Evasiuk, Director of Public Works and Infrastructure