

Inland Aggregates

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February 21, 2012

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

Dear Ms. Kormos, Senior Development Planner;

RE: Inland Aggregates Submission of Opposition to Proposed Bylaw 01-12

Inland Aggregates a division of Lehigh Hanson Materials Limited ("Inland") is one of the major producers of aggregate products in Alberta. We have made financial investments in Parkland County based on the current version of the Land Use Bylaw that allows natural resource extraction as a Discretionary Use within 304.8m (1000') of the boundary of a multi-parcel residential subdivision. We have recently been advised that natural resource extraction is no longer proposed to be allowed within 304.8m (1000') of the boundary of a multi-parcel residential subdivision as a Discretionary Use.

Inland believes that Parkland County should not amend Land Use Bylaw 20-2009, with Bylaw No 01-12 and rather continue to allow extraction only operations within the buffer adjacent to multi-lot residential subdivisions for the following reasons:

1) Interim Nature of Extraction Processes

- Aggregate extraction is an interim use with a limited timeframe, which the County regulates through the Development Permit process.
- Reclamation returns the land to a use of equal or greater capability than prior to extraction operations.
- Reclamation plans often provide recreation and open space areas for existing and future local residents.

2) County Benefits

- Rural development without employment and economic activities in the County is an unsustainable form of development. In consideration of the responsible and efficient use of land, the County should not provide higher priority to rural residential land use rather than an interim use, such as extraction, which provides economic benefit, good use of a natural resource and long-term development potential of the lands through reclamation.
- The proposed change denies the community the opportunity to make efficient use of the land and local resource.
- Extraction operations provide more local employment opportunities.
- Aggregate extraction increases the economic activity in the local area for business owners, landowners and residents.
- Aggregate extraction adds revenue for the municipality via the C.A.P. which reduces the local tax burden.
- Close to market aggregate extraction reduces haul route distances, as well it lowers the density of trucks on the road system, reduces the deterioration of road infrastructure and the tax dollars required to maintain the roads, lowering costs to the local tax payers.

3) Regulatory Framework

- The restriction of aggregate processing can be distinct from restriction of aggregate extraction.
- Monitoring operating hours for extraction in specified areas can address concerns regarding evening & night time disturbance.
- Denial of extraction activities may decrease rather than promote collaborative communication and engagement amongst operators, regulators and residents.

4) Landowner Rights

- The proposed change denies landowners the right to use property as intended when due diligence and purchase was completed based on existing Land Use regulations.
- By limiting potential uses within 304.8m the County is affecting the value of lands next to any rural residential subdivision that they approve as these are long-term developments that do not go away over time, often becoming more intense in their activities as they mature.
- All industry operating within the County requests and deserves fairness & a level playing field.

Thank you for the opportunity to provide our organization's input on the proposed Bylaw change. I can be reached for any questions or concerns regarding our comments at (780) 423-6326.

Regards,



Trevor Lema
Land Manager