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May 9, 2025

CVR File No.: 2255-C03

ISL Engineering and Land Services
7909 – 51 Ave. NW
Edmonton, AB T6E 5L9

RE: Review of Area Structure Plan Submission for
Canola Farms Area Structure Plan
NE-7-51-6W4M

Attn: David Schoor,

The County of Vermilion River (the "County") Planning & Community Services Department has reviewed your recent submission titled "Canola Farms Area Structure Plan" (the "Plan"), dated January 2025, prepared by ISL Engineering and Land Services. Please find attached the County's remarks regarding this submission for your consideration. This communication is intended to offer guidance to the applicant in revising the draft Plan.. Review of an Area Structure Plan proposal does not establish in any way, a decision or a guarantee of approval on the part of the County of Vermilion River (the "County").

The text as well as the illustrations (i.e., maps, engineered drawings, figures, photos, or similar) must be consistent in their content and should jointly address each requirement outlined in the attached remarks.

Please make any necessary changes to the Canola Farms ASP document and provide a revised submission of the document for final consideration by the Planning and Priorities Committee. Please submit one (1) hard copy and one (1) digital copy of the revised document.

Prior to submission of the final draft of the Plan, please ensure that Policy PD 007 – Sustainable Planning and Development Requirements has been thoroughly reviewed. Any information required by this Policy should be incorporated or updated within the revised Plan. A copy of Policy PD 007 is attached for reference..

Should you have any questions, please do not hesitate to contact the undersigned at the County of Vermilion River Administration Office.

Regards

Roger Garnett, C.E.T.
Director of Planning & Community Services

CANOLA FARMS AREA STRUCTURE PLAN – Review of Submission

May 9, 2025

Canola Farms Area Structure Plan Review

Upon review of the documents submitted for the Canola Farms Area Structure Plan (the “Plan”) dated January 2025, County of Vermilion River (the “County”) Planning and Community Services Department offers the following comments:

2.0 Policy Context

2.1 Statutory Plans and Land Use Bylaw

- i. The County of Vermilion River Municipal Development Plan section indicates that the County has advised that an amendment is not necessary. The Plan has not indicated when an amendment would be required should future development occur in the quarter section.
- ii. The County of Vermilion River Land Use Bylaw section does not contemplate future residential development, given that the MDP, LUB and this Plan each identify clustering.
- iii. The Plan does not identify the maximum land use intensity for the quarter section. Stronger wording should be used in section 8.2 – Development Staging, “...As no additional residential lots are anticipated...”

3.0 Site Analysis

3.2 Transportation Network

- i. Access to the unsubdivided residential Dwelling must be included, ensuring access to the parcel should further subdivision occur.
- ii. The current County of Vermilion River General Municipal Servicing Standards requirements are not met by the proposed fifteen (15) meter right-of-way, should the access be converted to a service road in the future. Provide clarification to the County as to how the access is to remain in place should a title-holder request conversion to a public road; and who would be responsible to pay the cost of the upgrade. Section 7.1.1 of the Plan indicates that development shall be “...in accordance with...County’s Design Standards...”.
- iii. Provide detailed mapping diagram(s) that demonstrate the location of access point(s) to accommodate agriculture equipment and vehicles, in addition to the current access from Township Road 512.
- iv. Section 6.1 indicates a transportation network, shown in Figure 5, however only the access rights-of-way is indicated. Further clarification is required.

1. How does the Plan accommodate County Policy PD 002 – Access Management Approaches and Policy PD 003 – Access Roads. *(both policies are available on the County's website)*

3.3 Wells, Abandoned Wells & Rights-of-Way

- i. Provide further clarity demonstrating what is to occur should the suspended well(s) be reclaimed. Demonstrate how access to a capped well(s) will be provided for serviceability of the well(s).
- ii. Ensure that reclamation of well(s) is completed keeping in mind future residential growth, given the Plan's proximity to current developed areas and that the Plan is forward-looking.

3.6 Historical and Archaeological Review

- i. Ensure that the Plan is updated using supporting information provided by the Province of Alberta.

3.7 Emergency Services

- i. Provide further clarity to define whether Protective/Enforcement Services is an Emergency Service identified within the Plan.
- ii. The Plan should not contemplate the number of Peace Officers available by the County, nor should the Plan identify the number of RCMP officers. The Plan must show support by Protective/Enforcement Services to the Plan Area, or to the County, and what those services include.

3.8 Health Services

- i. Further context is required to demonstrate what Alberta Health Services provides to the Plan Area.

3.9 Education

- i. Provide and identify any post-secondary education facility(s) and further context regarding the level of education provided by each education facility in the Plan Area.

3.11 Engagement

- i. Provide a map and/or table showing which landowner(s) were contacted as well as the location of the parcel(s). Include those parcel(s) of land that were contacted with no response received.

4.0 Land Use Concept

4.1 Land Use Concept Principles

- i. Diversity
 1. Provide reasoning to demonstrate a situation when a neighbor might seek a solution.
 2. Provide further clarification and/or context on how the Plan will accommodate both land uses identified.
- ii. Mobility
 1. Refer to the remarks provided in Section 3.2 and Transportation Policies above. This is not necessary.

- iii. Place
 - 1. Provide further clarification as to what is meant by "...strong identity..."

5.0 Land Use Policies

5.5 Environmental Policies

- i. The plan should provide direction on when a Biophysical and/or wetland would be required if further subdivision is contemplated.

5.6 Municipal Reserve Policies

- i. How is Municipal Reserve being dedicated and what is the intention of the dedication (e.g., land for playground, green space, environmental reserve, etc.)

7.0 Servicing and Utilities

7.1 Servicing Policies

- i. Identify to what standard water, sanitary and stormwater is to be installed to, and what types of systems are or are not allowed within the Plan Area (i.e., Private septic systems limited to field type systems)
- ii. The plan does not indicate if the current water table supports the current development or what restrictions if further development is suggested as no maximum density has been established other than a suggestion of anticipation.
- iii. Policy 7.1.3 identifies pre- and post-development rates, clarification of how and where surface drainage is occurring and to what standard and rate(s) (e.g., surface water draining across other titled lands, is there easements or natural drainage).
- iv. Surface water is identified that any alteration shall require provincial approval, however the Plan nor the Policies identify how an existing or new subdivision does not drain over other titled property.
- v. Policy 7.6 identifies low-impacting design and then details bioswales, but no other strategy as identified in 7.6(a).
- vi. Stormwater Management Plan is identified, no mapping has indicated the general surface flow pattern.

7.2 Utilities Policies

- i. Policy 7.2.1 identifies the corridors shown on Figure 5, there are no corridors or general servicing area provided on the map.
- ii. Policy 7.2.5(b) identifies sharing utility corridors, the policy should provide how this would be accomplished and who would be responsible for those areas.

8.0 Implementation

8.1 Amendments to the ASP

- i. Identify how the plan may be amended.
- ii. Identify what reporting will be undertaken if the plan is amended.

Planning & Community Services

- iii. Identify how and when the following will be used to inform a future developer and when are these going to be implemented when further development is to occur:
 - 1. Environmental Assessment; and/or
 - 2. Wetlands or biophysical Assessment;
 - a. Geotechnical Report;
 - b. Historical Resource Clearance – to be updated in this document;
 - c. Stormwater Management Plan;
 - d. Infrastructure – Preliminary Engineering (roads, utilities, etc);
 - e. TIA – this will be dependent on maximum density;
 - f. Utility easement and planning;
 - g. How does this plan direct ground water impacts; and/or
 - h. What is the minimum type of septic system.

Roger Garnett

From: David Schoor [REDACTED]
Sent: June 2, 2025 6:07 PM
To: Roger Garnett
Cc: Shawn Jacula
Subject: FW: Canola Farms ASP - File 2255-C03
Attachments: 250602_Canola_Farm_ASP_Final_16879.pdf

Hi Roger, please find attached the updated ASP. We've revised the ASP to reflect the conversation you, Shawn, and I had on May 22, 2025. We haven't received your notes on the amendment process, and if provided we can add it to the ASP later. We also haven't received a word document version of the County's letter which we could have used track our responses to the County's comments. Instead, we list the following as responses:

1. Added text to Section 3.2 to clarify the transportation network.
2. We agreed Section 3.3 did not require edits as AT, the oil company, and landowner will negotiate the remediation of the suspended well.
3. Section 3.6 added to provide clarity about surface drainage in the plan area.
4. Update to Section 3.7 by adding the approval date provided by Alberta's Historic Resources Management Branch.
5. Update to Section 3.9 by adding "The centre provides a range of healthcare services including a 24/7 emergency department".
6. Update to Section 3.10 by adding "Lakeland College".
7. Update to Section 3.12 by adding a text and map describing who responded to requests for comment.
8. Update to Section 4.0 by adding a description of ASP density.
9. Update to Section 4.1 "Land Use Concept Principles" by deleting all text.
10. Update to Section 5.3 by adding clarifying text re: access.
11. Delete former Policy 1 of Section 5.5. The policy read "At the time of subdivision, environmental reserve may be required for land deemed by the County to be unsuitable for development."
12. Section 5.6 revised for clarity.
13. Text in Section 6.1 is deleted for clarify.
14. Section 6.1, Policy 2 is revised for clarity.
15. Section 6.1, Policy 3 is added.
16. Section 6.1, Policy 5 and 6 are deleted. Figure 5 is updated with access locations to address comments.
17. No edits needed to Section 7.0, Policy 1 as the province requires a 90m setback to pump outs.
18. Section 7.1, Policy 2 is revised for clarity.
19. The following is deleted from Section 7.1, Policy 6 "A Stormwater Management Plan (SWMP) may be required at the time of subdivision or development permit stage to detail these designs."
20. Roger to provide list for Section 8.0, Policy 8.1.

David Schoor, MCP, RPP, MCIP | *Development Regulation Lead*

ISL Engineering and Land Services Ltd.

T: 780.438.9000 **C:** 780.233.9835

From: Roger Garnett [REDACTED]
Sent: Saturday, May 10, 2025 7:09 AM
To: David Schoor [REDACTED]
Cc: Shawn Jacul [REDACTED]; Andrea Neufeld [REDACTED]
Subject: Canola Farms ASP - File 2255-C03

Hi David,

Please find attached the letter and comments regarding the review of the submitted Area Structure Plan.

Regards,

Roger Garnett, C.E.T.

Director, Planning & Community Services



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