

July 5, 2017

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RE: LDA17-0136 Land Development Application for ASP, Text Amendment (Edmonton Energy and Technology Park)

Thank you for providing us with the opportunity to comment on the amendments to the Edmonton Energy and Technology Park Area Structure Plan and the creation of a new Medium Industrial Zone. As articulated in Sturgeon County's Municipal Development Plan, Sturgeon County envisions future links between the Edmonton Energy & Technology Park (EETP) and established industrial areas in Sturgeon County.

1. Alberta Industrial Heartland (see Neighbourhood J of MDP). Sturgeon County became a founding member of the Alberta Industrial Heartland in 1998. Approximately 9,886 ha of designated and zoned heavy industrial land exists in the area.

2. Sturgeon Industrial Park (see Neighbourhood I of MDP). Sturgeon County established the industrial park in the early 1970's. Approximately 486ha of designated and zoned medium industrial land exists in the area.

Over the last four decades, extensive land use planning, infrastructure investment and depopulation has occurred in the above planning areas to provide conditions necessary for the petrochemical industry to establish and flourish. Given both the scale and location of EETP in relation to expanding communities (both urban and rural) and already zoned industrial lands in Sturgeon County (10,372ha), Sturgeon County's position is that any amendments to the EETP ASP must adhere to the Growth Plan's policies and principals related to planning and growth management (see below for specific examples).

It remains a priority of the Growth Plan to maintain an adequate supply of employment types, minimize regional development footprints, ensure efficient provision of infrastructure networks and to support regional economic development partnerships. It is understood that merging the existing EETP manufacturing and logistics land use precincts to a new medium industrial land use precinct is intended to provide increased flexibility for industrial development in the plan area. Given that subsequent development approvals will be implemented solely through the land use precincts, Sturgeon County notes that there currently exists little policy or certainty at the Area Structure Plan level as to the scale or density of development that could be established near existing communities in Sturgeon County and to already designated heavy and medium industrial zoned lands. This is noted in the EETP ASP itself (Section 11.2) in that *'this area will require a new type of process for the review of zoning applications. Zoning applications in EETP will require a coordinating technical report to be in place to address this detail shortfall, which will take the form of a technical report'*. Given the circumstances noted above, there is currently

no way to evaluate the full local or regional impact of future non-residential developments along Sturgeon County's shared boundary.

### **Intermunicipal Planning Considerations**

In consideration of diverse land use patterns, transportation networks, drainage basins and environmental networks outside of jurisdictional boundaries, it is noted that previously, the City of Edmonton has either completed or initiated joint planning studies along shared boundaries with both Strathcona County and Parkland County to better understand potential impacts from proposed developments (see City of Edmonton/Strathcona County joint planning study completed in 2012 and City of Edmonton/Parkland County study currently in progress). These joint planning studies typically extend 1.6km into each municipality. From a general land use planning perspective, Sturgeon County stresses the importance of an appropriate transition between established communities in Sturgeon County and the medium industrial precinct. Any new commercial and industrial developments should provide adequate consideration to neighbouring residences within Sturgeon County. To provide additional assurance to existing and future residents of the area, additional policies in Section 7.3 'Medium Industrial Precinct' or in Section 10.4 'Land Use Compatibility' would be helpful to provide context of medium industrial lands abutting existing communities in Sturgeon County. As an example, policies may refer to maximum development thresholds of specific uses within a 1.6km interface of the ASP boundary. Alternatively, there may be opportunities for expanding the public consultation area (currently at 60m) for proposed Technical Report Sub-Areas in Section 11.2 (Sub-Areas H, I, P Q and R on Figure 23), along with assurances that comments from Sturgeon County will be considered during this proposed new type of process for the review of zoning applications. *Sturgeon County seeks consultation on additional design guidelines, land use compatibility policies and the proposed zoning application processes to ensure that appropriate site planning will be considered in respect to this above noted interphase area.*

### **Growth and Employment Projections**

In reference to the supply of industrial lands in the northeast portion of the Edmonton Metropolitan Region, it is stated that the EETP ASP area (5,218ha) represents approximately two-thirds of the City of Edmonton's vacant industrial land and that over the 2021-2026 time period, EETP is forecasted to capture 43% of the City's industrial demand. It is also stated that EETP is expected to absorb 19% of the demand for heavy industrial lands from 2016 to 2026. In reference to the City of Edmonton's employment projections to 2044 (increase of 344,967 from 2014 to 2044), the total projected employment population of EETP (85,289) would account for approximately 25% of the City of Edmonton's employment growth leading to 2044. While it is understood that the Growth Plan employment and population projections (Schedule 1) are general guides only, they are typically used to quantify scale and aspiration in relation to future residential and non-residential development. *Sturgeon County seeks clarity on the correlations between the EETP employment projections outlined in the ASP and the City of Edmonton employment projections outlined in Schedule 1 of the Edmonton Metropolitan Region Growth Plan.*

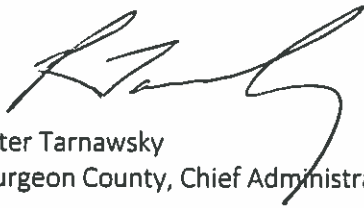
### **Functional Planning and Energy Corridors**

Pipeline systems mentioned in the EETP ASP outline future priority corridors to connect EETP with Alberta's Industrial Heartland. While the ASP acknowledges the required coordination with the Province, AIH and affected municipalities, Sturgeon County stresses that alignments outlined in Schedule 8B of the Edmonton Metropolitan Region Growth Plan linking EETP with AIH are conceptual only. *Sturgeon County seeks clarity on the additional*

*functional planning and intermunicipal engagement that will be needed to support these conceptual alignments and additional clarity of the subsequent statutory plan amendments that would be required.*

At this time, Sturgeon County is hopeful that we can collectively develop additional policy (at the ASP level or within the tentatively defined Technical Report Sub-Areas identified in Figure 23) to improve collaboration and communication regarding land use planning along the 10km shared boundary of the EETP plan area. We are hopeful that doing so will allow for Sturgeon County to support a refined version of the proposed EETP ASP text amendments. We are available for further discussions with City of Edmonton Administration to address these outstanding issues.

Sincerely,



Peter Tarnawsky  
Sturgeon County, Chief Administrative Officer

Cc: Sturgeon County Council  
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