



FIGURE 4.0

OWNERSHIP MAP



LEGEND

- PRIVATE LANDS
- PUBLIC LANDS



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SCALE - 1:20,000  
ORIGINAL SHEET - ANSI A



September 7, 2018  
1161 106060 KC

FIGURE 11.0

STAGING PLAN



SCALE - 1: 20,000  
ORIGINAL SHEET - ANSI A



December 12, 2018  
1161 106060 KC

# ALTERNATE

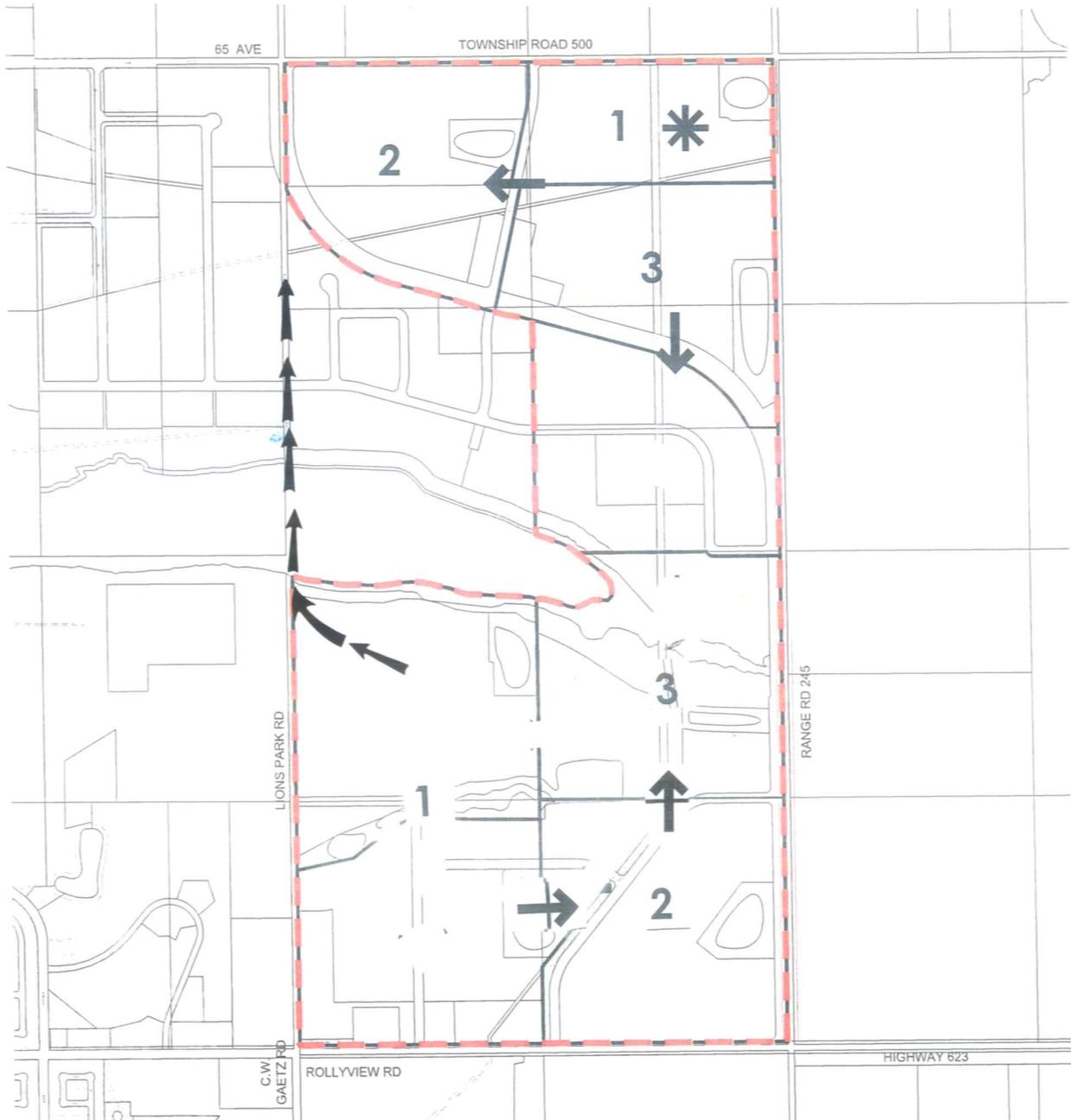
## FIGURE 11.0

## STAGING PLAN



### LEGEND

- \* INITIAL AREA OF DEVELOPMENT
- ← INDICATES THE GENERAL DIRECTION OF DEVELOPMENT
- - - ASP BOUNDARY
- Telford Lake Sewer Crossing



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SCALE - 1: 20,000  
ORIGINAL SHEET - ANSI A



December 12, 2018  
1161 106060 KC

# ALTERNATE

## FIGURE 12.0

## SANITARY SEWER CONCEPT



### LEGEND

- PROPOSED SANITARY SEWER
- - - SANITARY FORCEMAIN
- LIFT STATION
- 300 SEWER SIZE (mm)
- - - ASP BOUNDARY

→ Telford Lake Sewer Crossing



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SCALE - 1: 20,000  
ORIGINAL SHEET - ANSI A



March 29, 2018  
1161 106060 KC

EAST TELFORD LAKE ASP HEARING

LEDUC CITY HALL CHAMBERS – FEBRUARY 25, 2019

MR. MAYOR, Leduc City Councillors, City Administration, Ladies and Gentlemen, my name is Robert Gaetz and I am the owner of the SW ¼ 30 comprising 153.66 acres all of which is included within the East Telford Lake ASP document now before you for passage.

Having been born and raised in Leduc, I am well aware of the land development history of Leduc from the 1960's when my late parents acquired the lands surrounding Telford Lake. I have with me today, Mr. Don Grimble who has a planning degree and engineering background and who worked with my family on the north Leduc Industrial Park north of 65<sup>th</sup> Avenue on both sides of the CPR rail line which was all developed as Urban Cross Section (no swale drainage ways).

I have reviewed all of the four (4) drafts of the ASP document which were March 2018 through to January 2019. Many of my comments and objections were addressed, however, I still have two (2) major problems with the January 2019 document before you; namely the phasing/timing of the proposed path of development and secondly the discriminatory way that servicing standards are addressed as between the lands north and south of Telford Lake.

Firstly on the timing/staging/pace of development contained in Figure 11 of the document, I note that in 2.1 that under the MGA that there must be a "sequence of development proposed". I also note that under 2.2 subsection 4.1 that there is an

overarching guiding principle that the ASP “establish a compact and contiguous development pattern”. Contiguous to me means building out from existing development. This ASP plan does not represent a contiguous development pattern but rather a linear development into leap frog style development to get around a water body namely Telford Lake.

Under section 2.4 and 7.3 there is reference to most of the lands to the south of Telford Lake not being developable within the 35 year time frame of the current plans. I find it highly inappropriate and offensive to have my lands categorized in a municipal plan to be beyond the contemplated time horizon of the plans under discussion. The reference to this timing should be struck from the document.

To effect a compact and contiguous extension of development from existing built up Leduc, the ASP should endeavor to facilitate development generally in an east bound direction concurrently on both the north and south sides of Telford Lake. The lands in the West ½ of Section 30 generally slope to the north to Telford Lake and make its early development both practical and logical. Waiting 35 or more years for land a stone’s throw from Christ the King school, a new church, the Lion’s campground and the expanding Robinson neighborhood seems wrong headed if a practical solution to sanitary sewer servicing can be implemented.

Under section 2.4, the five sustainability pillars including “Smart Growth”, are not achieved by the current plan phasing. For the residents of Robinson and Tribute to have

to wait for more than 35 years for employment and commercial opportunities in their vicinity is, in my opinion, “far from smart”.

In applying some IMAGINATION to this proposed plan, I would like council to consider the following servicing alternative to allow both the lands to the north and south of Telford Lake to proceed in development concurrently in an easterly direction. I have taken the liberty of altering the development phasing map in Figure 11 to consider the two compartmentalized areas to be concurrently phased as Section 1 to 3 on both the north and south sides of Telford Lake.

This can be accomplished by reversing the direction of the lift station shown on NW ¼ Section 30 on Figure 12 of the March 29, 2018 draft to push sanitary effluent in a sanitary sewer line to be augered under Telford Lake for a “mere distance of ¼ mile”. This line will interface with the Harvest Industrial plan and the Lakeside Industrial plan. It is commonly known that industrial sewage flows are a low fraction of residential sewer flows and any capacity issues with the outflow into the Leduc International Industrial line can be engineered into the south Telford Lake lands to allow storage for an after peak hour pump off at night. This practice has been successfully used by the City of Edmonton a prime example of which is the NEST sewer line on 153 Avenue.

The recent placement of the large diameter Millet water line under Telford Lake in this same road allowance has already passed the environmental approvals and also provides a permanent right of way path for this sewer servicing solution. This proposal does not disrupt the servicing and proposed phasing of the lands on the north side of

Telford Lake, however, I must say that the location of the North Telford Lake Phase I does represent somewhat of a leap frog of development. Sewer lines under the North Saskatchewan River in the City of Edmonton have been practical and common.

The benefits of this proposal to the City of Leduc is that it offers:

- a) Choice of location to the industrial market.
- b) More land development competition which always results in quicker aggregate development.
- c) Quicker development offers an enhanced tax base sooner. As an example, my property taxes for the SW ¼ of 30 under provincial legislation amount to under \$400/year. Waiting 35 years to change this seems irrational if it is not necessary.
- d) A more balanced growth in urban form.
- e) The ability for the City of Leduc to grow industrially if ownership interest issues in the early phases of the proposed plan prove to be an impediment to the development launch of this ASP.

My second area of concern is the way in which servicing standards are not applied evenly and fairly on the north versus the south side of Telford Lake. You will find these distinctions on pages 34 and 35 of the ASP document referring to Rural Cross Section (open drainage swales with no curb and gutter) on the north of Telford Lake versus Urban Cross Section (curb and gutter with deep storm sewer pipes), on the south side of Telford Lake.

First for a bit of history. Some 15 or so years ago, the developer of the lands from Airport road south to 65<sup>th</sup> Avenue convinced the City of Leduc to allow Rural Cross Section standards. This resulted in an approximate price advantage of \$250,000/acre compared with City of Edmonton Urban Cross Section industrial lands. This has been the reason for the rapid development of the Leduc International Industrial Park that we see today. I fully support a continuation of Rural Cross Section north of Telford Lake, however, except for the potentially commercial frontage on Rolly View Road. I strongly oppose Urban Cross Section on the balance of the lands south of Telford Lake for the following reasons:

- a) The south Telford Lake lands represent a new or pioneering location for Industrial Development and financially burdening these lands by expensive Urban Cross Section standards will discourage their development in the near, medium and long term and will not serve Leduc's goal of a 60% residential to 40% industrial/commercial tax base goal as stated in Leduc's 2012 municipal development plan.
- b) It should be noted that the Remington Discovery Park north and west of Highways 19 and QE2 are now in the City of Edmonton and are being developed to Rural Cross Section standards. Lands to the south of Telford Lake with imposed Urban Cross Section standards in a pioneering location will not have any hope of being developed and successfully marketed in the face of the "new" City of Edmonton Rural Cross Section standards. It is folly to plan lands for ultimate and inevitable failure.

- c) Leduc's planning department proposed that an upscale Office Park be developed in South Telford Lake with provision for bus stops, bike ways and so on. This is Utopian planning. Leduc is a winter city. People working in industrial parks generally drive vehicles or car pool to work. In any event, should a couple of transit drop off/pick up stops be necessary in the South Telford Lake lands, they could easily be built into a Rural Cross Section plan. No multi-ways through the South Telford Lake industrial are needed as the multi-way through the Lion's Campground Lands provide adequate access to Telford Lake from Robinson and beyond. The first bullet at the top of Page 11 admits that an office/park may not be practical. Having lived and worked through the National Energy Plan years of the early 1980's, nearly no new office towers were built in downtown Edmonton for about 35 years. Currently we are reliving similar market conditions of the 1980's. An office park will most likely not succeed.
- d) My 44 years of experience in the commercial/industrial brokerage business tell me that lands south of Telford Lake will not attract sufficient office space demand to launch, particularly in the face of the competition from the Edmonton International Airport lands and lands fronting QE2 such as Remington's Discovery Park.

The benefits to the City of Leduc in having Rural Cross Section standards south of Telford Lake are:

- a) They provide winter storage of snow in attractive graded and landscaped drainage swales and therefore reducing snow removal costs for the City of Leduc which would negate any potential costs of swale maintenance and may, in fact, provide a net cost benefit to the City of Leduc.
- b) Maintains a land price scenario competitive with other nearby municipalities allowing for a fair share of future development demand and expanding tax base for the City of Leduc.

I would like to point out that in other areas of Leduc, such as the Corinthia Park extension of sewer service into Southfort, there were similar servicing issues as the lands south of Telford Lake and workable solutions were found. The same effort should be made for the lands south of Telford Lake.

In conclusion, the rapid growth of Leduc over the past two decades has resulted from:

- a) Competitively reasonable land costs compared to the City of Edmonton.
- b) Reasonable real estate taxes relative to the City of Edmonton.
- c) Nearby access to three (3) modes of transportation by road rail and air.
- d) A small city feel for raising your family in a safe, friendly and economically progressive environment.

In conclusion, I would ask that council share my views and vision and to refer this plan back to administration for a further review and analysis of my propositions and to

do a potential re-write of portions of the plan to accomplish a better and more practical plan.

Myself and Mr. Grimble are more than happy to try to answer any questions that you may have and I welcome the plan authors to discuss with Mr. Grimble how we can make my proposals work.

Thank you for listening.

## 2.0 PLANNING CONTEXT

### 2.1 MUNICIPAL GOVERNMENT ACT

This ASP has been prepared in accordance with Part 17 of the *Municipal Government Act* (MGA). Per the MGA, an ASP must describe:

- the sequence of development proposed for the area;
- the land uses proposed for the area, either generally or with respect to specific parts of the area;
- the density of population proposed for the area either generally or with respect to specific parts of the area;
- the general location of major transportation routes and public utilities; and,
- may contain any other matters, including matters relating to reserves, as the council considers necessary.

The ASP must be consistent with the IDP in respect of land that is identified in both the ASP and the IDP. The ASP must also be consistent with the MDP.

### 2.2 EDMONTON METROPOLITAN REGION GROWTH PLAN

In October 2017, the Alberta government approved the Edmonton Metropolitan Region Growth Plan (EMRGP). The Growth Plan guides the daily work of the Edmonton Metropolitan Region Board (EMRB), ensuring decisions and programs are integrated to support the long term economic prosperity and quality of life for all citizens of the Edmonton Metropolitan Region.

The Vision and Growth Plan are shaped by seven overarching Guiding Principles:

1. Collaborate and coordinate as a Region to manage growth responsibly.
2. Promote global economic competitiveness and regional prosperity.
3. Achieve compact growth that optimizes infrastructure investment.
4. Ensure effective regional mobility.
5. Recognize and celebrate diversity of communities, and promote an excellent quality of life across the Region.
6. Wisely manage prime agricultural resources.
7. Protect natural heritage systems and environmental assets.

The East Telford Lake ASP supports the EMRGP and facilitates the following objectives:

- 1.1 – Promote global economic competitiveness and diversification of the regional economy.
- 1.2 – Promote job growth and the competitiveness of the Region's employment base.
- 1.3 – Enhance competitiveness through the efficient movement of people, goods and services to, from and within the Region.
- 2.1 – Conserve and restore natural living systems through an ecological network approach.

- 2.2 – Protect regional watershed health, water quality and quantity.
- 2.3 – Plan development to promote clean air, land and water and address climate change impacts.
- 2.4 – Minimize and mitigate the impacts of regional growth on natural living systems.
- 4.1 – Establish a compact and contiguous development pattern to accommodate employment and population growth.
- 4.6 – Prioritize investment and funding of regional infrastructure to support planned growth.
- 5.1 – Develop a regional transportation system to support and enhance growth and regional and global connectivity.
- 5.3 – Coordinate and integrate land use and transportation facilities and services to support the efficient and safe movement of people, goods and services in both urban and rural areas .
- 5.4 – Support the Edmonton International Airport as northern Alberta's primary air gateway to the world.
- 6.2 – Minimize the fragmentation and conversion of prime agricultural lands for non-agricultural uses.
- 6.3 – Promote diversification and value-added agriculture production and plan infrastructure to support the agricultural sector and regional food system.

## 2.3 EDMONTON INTERNATIONAL AIRPORT VICINITY PROTECTION AREA REGULATION

The Province of Alberta's Edmonton International Airport Vicinity Protection Area Regulation (EIAVPA; AR 55/2006) identifies a range of limits on development to address the functional requirements and noise impacts of airport operations. Specific to the plan area, the EIAVPA identifies Noise Exposure Forecast (NEF) contour areas, within which various types of development should be restricted.

The majority of the plan area is affected by the overlay in one of the following contour areas: NEF 25-30, NEF 30-35, and NEF 35-40. These contour areas have increasing restrictions on the types of land uses that are permitted to be located within them. Examples of restricted uses include residences and campgrounds, churches, day cares, schools, and spectator sports facilities.

This ASP recognizes that a restriction on sensitive land uses is required to protect the continued successful operation of the Edmonton International Airport. To conform with the AVPA, this plan carefully considers the NEF contour lines when allocating land uses. As a result, a majority of the plan is designated for industrial type uses, and residential uses are completely omitted.

## 2.4 CITY OF LEDUC/LEDUC COUNTY INTERMUNICIPAL DEVELOPMENT PLAN BYLAW NO. 772-2011, AS AMENDED

In the Fall of 2007, the Councils of the City of Leduc and Leduc County agreed to the collaborative preparation of the Joint Sustainable Growth Study and an Intermunicipal Development Plan (IDP). The Guiding Principles are regional in scope and are based upon five Sustainability Pillars:

- Smart Growth
- Creating Vibrant Communities
- Environmental Stewardship
- Economic Development
- Responsible Governance

In 2017, the IDP was amended to facilitate the business-based land use policies along the east side of the City and around the County's Saunders Lake. The East Telford Lake ASP is located within policy areas B (Saunders/Telford Lake Business) and G (Southeast Business Industrial).

The general purpose and intent of the Saunders/Telford Lake Business Policy Area B is to provide for high quality business, light industrial, and office development with complimentary commercial uses north of Saunders Lake.

Southeast Business Industrial Policy Area G, located south of Telford Lake, is meant to provide for commercial, office, business, and light industrial development. Given servicing constraints, this area is not expected to be developed within the 35-year time horizon of the IDP.

## 2.5 MUNICIPAL DEVELOPMENT PLAN, BYLAW 773-2011, AS AMENDED

In April 2012, the City of Leduc approved the MDP (Bylaw 773-2011). The MDP was subsequently amended in January 2015 (Bylaw 870-2014) and August 2017 (Bylaw 934-2016). The City of Leduc MDP provides a long-term vision and policy direction for growth and development in the city. The MDP determines where growth is most feasible based on such factors as infrastructure, sustainable growth principles, and economic development opportunities. The MDP also addresses the environment; the economy and tourism; social wellness and safety; recreation and culture; governance; and the administration, monitoring, and implementation of the MDP policies.

Several land use policy area designations are identified within the ASP area – Telford Lake Commercial, Office, Light Industrial, and Business Park; Transitional Industrial Use; Open Space and Greenways; and Riparian Areas (see Figure 5: MDP Context).

Telford Lake Commercial, Office, Light Industrial, and Business Park uses are to be developed along the north and south sides of Telford Lake, to ensure the compatibility of development with adjacent parks and natural areas, and to mitigate environmental and visual impacts on Telford Lake and the surrounding riparian areas. The MDP also directs these areas to incorporate low-impact stormwater

## 7.0 IMPLEMENTATION

The implementation of this plan may require amendments to the Land Use Bylaw to create or modify land use districts or overlays to support implementation of the policy directions of this plan.

Outline Plans will be required prior to redistricting and subdivision to ensure that sub-areas are planned to an appropriate level of detail.

Within this plan area, the City of Leduc will require development proponents to assume financial responsibility for the extension of all required municipal utility services, including any initial capital cost. In accordance with the provisions of the *Municipal Government Act*, the City will endeavour to ensure that development proponents receive appropriate compensation from future benefiting developments as they occur, either through the establishment of a levy, cost sharing arrangements, or some combination thereof.

### 7.1 OUTLINE PLANS

#### 7.1.1 Policy

- A. Prior to the approval of redistricting or subdivision that would allow development to proceed, detailed Outline Plans shall be prepared by the applicant and accepted by the City of Leduc. The City, at its sole discretion, may waive the requirement for an Outline Plan.
- B. Outline Plans shall be consistent with the East Telford Lake ASP, and with all adjacent Outline Plans.

### 7.2 LAND USE BYLAW

#### 7.2.1 Policy

- A. Amendments to the Land Use Bylaw may be required to ensure that development occurs as envisioned in the East Telford Lake ASP. The City of Leduc shall be responsible for initiating the amendment process.

### 7.3 STAGING

Development is anticipated to begin in the north of the ASP area, and proceed south and west, as services are extended as indicated in Figure 14: Staging Plan. In general, development will proceed in a manner that is contiguous, logical, and economical with respect to municipal servicing.

Development of individual phases may vary from the actual outline plan, redistricting and subdivision applications, depending on market demand and the aspirations of respective landowners. Should sufficient demand warrant, or engineering design be made more efficient, portions of separate phases may be developed concurrently.

Per Section 5.8 of the IDP, future development within Policy Area G (located south of Telford Lake) is not expected to occur within the 35-year time horizon of the IDP. However, development of the cemetery (Urban Services) may proceed in advance of the full availability of municipal services.

### 5.2.1 Policy

- A. Arterial and collector roadways within the East Telford Lake ASP shall be developed in general accordance with Figure 10: Transportation Plan.
- B. Arterial and collector roadways north of Telford Lake will be designed to a rural standard, unless otherwise specified in roadway planning studies, or where they tie into existing urban standard roadways.
- C. Arterial and collector roadways south of Telford Lake will be designed to an urban standard, unless otherwise specified in roadway planning studies.
- D. As development occurs, the City of Leduc will review opportunities and requirements for public transit. Arterial and collector roadways may, at discretion of the City, be designed to accommodate transit routes and stops. Locations of transit stops and routes will be determined at the Outline Plan stage.
- E. Outline plans shall identify sufficient road right of way to accommodate the roadway requirements identified in the East Telford Lake TIA, or through functional plans. If modifications to roadway standards are required, cross sections shall be approved by the City of Leduc.

## 5.3 LOCAL ROADWAYS

Requirements for local roadways will be determined at the Outline Plan stage.

### 5.3.1 Policy

- A. Local roadway alignments will be identified at the Outline Plan stage and will be designed and developed to a rural standard, in accordance with the City of Leduc Minimum Engineering and Design Standards.
- B. Local roadway alignments will be identified at the Outline Plan stage and will be designed and developed to an urban standard, in accordance with the City of Leduc Minimum Engineering and Design Standards.
- C. Local roadways north of Telford Lake will be designed to a rural standard, unless otherwise specified in roadway planning studies, or where they tie into existing urban standard roadways.
- D. Local roadways south of Telford Lake will be designed to an urban standard, unless otherwise specified in roadway planning studies.

## 5.4 PROCESSIONAL ROUTES

In order to reflect the character of the routes into the Urban Services Area (municipal cemetery) as areas of solemn reflection and respect, to provide space for 'decompression', and to differentiate them from other exclusively industrial/commercial areas, alternative design standards may be applied to applicable Processional Routes.

### 5.4.1 Policy

- A. Notwithstanding Policies 6.2.1 (B) and 6.3.1 (A), roadways indicated in Figure 10: Transportation Plan as Processional Routes, shall be designed constructed, to the satisfaction of the City of Leduc, to ensure their intended function and character. Other roadways, including local roadways, may be identified at the Outline Plan stage.

## 6.0 SERVICING

A Servicing Study outlining the stormwater, sanitary, and water systems for the ASP area, was prepared and submitted under separate cover (Stantec, 2018). This section provides a description of the conceptual servicing schemes, and provides policy direction. All water, sanitary and storm servicing plans will need to be confirmed at subsequent design stages.

### 6.1 STORMWATER MANAGEMENT

Figure 11: Stormwater Servicing shows the proposed stormwater servicing plan. Several stormwater management facilities (SWMFs) are identified based on the existing topography and drainage patterns and the land use and transportation designs. The location and configuration of the proposed stormwater management facilities will be further refined based on the detailed drainage area grading and internal roadway network requirements.

The north area of the East Telford Lake ASP is proposed to be developed to rural standards while the south area is proposed to be developed to urban standards. The conveyance system within each drainage basin will need to be designed based on the local roadway configuration and site grading requirements.

As shown on Figure 11: Stormwater Servicing, three outfalls are proposed to service the ASP area. It is proposed that the south ETL area will be drained to Telford Lake through the two proposed outfalls. For the north ASP area, one outfall is proposed through a tributary located on a privately-owned parcel in the County discharging to Saunders Lake. This cross-boundary drainage will require intermunicipal and/or owner approval. Alternatively, a piped outlet discharging directly to Saunders Lake could be constructed along Township Road 500. Draining the north ETL area to Telford Lake would require pumping and is not recommended.

# DISCOVERY

## BUSINESS PARK

### STAGE 1 - SUBDIVISION PLAN

- LI - LIGHT INDUSTRIAL
- UC3 - URBAN COMMERCIAL
- BUSINESS PARK



- BUILD-TO-SUIT & LAND SALE OPPORTUNITIES
- PHASE I SERVICING TO BE COMPLETED Q4 2018
- FULLY SERVICED INDUSTRIAL/COMMERCIAL LOTS
- FLEXIBLE SIZE RANGES FOR VARIOUS USERS
- HIGH TRAFFIC EXPOSURE ALONG QEII & HWY 19
- PRICING STARTING AT \$550,000 PER ACRE



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recommended in the AVS were considered, and their current validity confirmed based on the changing economic landscape that has occurred in Leduc and Alberta since 2015.

Based on the research conducted through a Regional Economic Development Analysis, and an Economic Diversification Analysis, several key items were determined:

- A large spike in the office vacancy rate over the past several years in the Edmonton Metropolitan Region may prohibit the construction of a Lakefront Corporate Park. A Lakefront Corporate Park should still be considered over a medium to long term phasing schedule, but possibly at a smaller-scale than previously planned.
- Industrial space has continued to be a strong performer from a leasability standpoint in the Edmonton Metropolitan Region, even through an economic downturn.
- Flex industrial / flex commercial space has become a preferred choice of development for many developers and end-user tenants. There may be a greater opportunity for flex space moving forward. Flex industrial and flex commercial space allows for a multitude of uses and tenants to work in synergy with each other.
- The four core economic clusters identified in the 2015 study for the Telford Lake Southern District are viable and have great potential for the East Telford ASP.
- The ICT cluster has better validity to be included within the primary economic clusters of agri-business, advanced manufacturing, and energy, rather than a standalone cluster.
- The sub-sector of agricultural-biotech within the life sciences cluster has better validity to be included within the agri-business cluster (described as "ag-tech"). Other life science sub-sectors such as medical devices, research and development, and pharmaceuticals, would be more optimally located closer to EIA, at the 65th Avenue West priority area.
- The phasing diagram depicted in the AVS for the East Telford ASP Area may require alteration due to varying availability of utilities, including sanitary servicing. The first phase of development will occur where access to sanitary servicing is provided.

These themes were considered and applied in the planning process for the East Telford ASP.

## 2.7 TELFORD LAKE MASTER PLAN

The Telford Lake Master Plan provides a comprehensive plan and strategy for development and management of Telford Lake and the lands that surround it (ISL Engineering, 2010). The five key objectives of the Telford Lake Master Plan are:

- Environmental Protection – protect water quality, habitat and vegetation for visitors and wildlife.
- Multiway and Trails – provide for the extension of the multiway network around the lake.
- Recreation Open Space and Facilities – define and create a series of recreation facilities around the lake.
- Paddling Venue – provide a plan for the establishment of Telford Lake as a regional paddling centre.
- Land Acquisition – define land acquisition requirements and the mechanisms for these acquisitions.

**Written Submission for Public Hearing on February 25, 2019, on  
Bylaw No. 1008-2018 – East Telford Lade Area Structure Plan**

**From:** Bruce A. McCollum  
**Sent:** February-20-19 6:18 PM  
**To:** Sylvain Losier <[SLosier@leduc.ca](mailto:SLosier@leduc.ca)>  
**Subject:** RE: East Telford Lake ASP - Final Draft

Hi Sylvain,

Further to our conversation on February 19/19 regarding my concerns with the proposed ASP which I have outlined herein.

- a) I would like to propose that the south half of our land be classified as Aero Employment under land use. This would provide much more flexibility over time to develop our land. This portion will be accessible from the collector and easy connection to the highway. We do not believe the market will be deep enough to populate the entire property under Flex Business. We are happy with the Flex Business land use on the north half of our land as it relates to the lake and the multiway.
- b) I think that stating in the ASP that our land south of Telford Lake won't be developed for 35 years is a very negative statement. Potential tenants, investors, developers and financial institutions look at that, because the City has said it, and bypass our area to focus on lands north of the lake and north of the airport. This kind of statement is not good for any of the stakeholders.
- c) Designating the land south of the lake as urban cross section will significantly add to the servicing costs and render the serviced sites uncompetitive compared to lands north of the airport and north of the lake.

We hope that the City will appreciate these concerns and consider modifying the ASP in favor of the comments above. Thank you.

Bruce A. McCollum  
President  
**Baramy Investments Ltd.**