



REPORT TO THE MUNICIPAL PLANNING COMMISSION

April 14, 2022

Agenda Item	
Application No.	18/22
Proposed Development	275-stall campground <i>*expansion of existing campground</i> and 11,050 ft ² community facility/indoor recreation facility
Legal Description	Lot 8 Plan 982 4271 (Pt. NE 01 and SE 12-41-01-W5M) (Sandy Point RV Resort, Gull Lake)
Titled Area	148 acres (60 hectares)
Zoning	Recreational Vehicle Resort 'R-RVR' District
Landowner/Applicant	Delta Land Co. Inc.

BACKGROUND

Delta Land Co. Inc., has applied for a 275-stall campground expansion at Sandy Point RV Resort, for a total campground size of 550-seasonally leased stalls. The campground will occupy approximately 56.3 acres (22.8 hectares) directly north of the existing campground, west of the beach. A site plan is included in the proposed development details attached in **Appendix A**.

The proposed development includes 275-stalls in three phases, although all three phases are intended to be constructed at one time. Three washroom/shower buildings and play areas are proposed (playgrounds/benches/garbage cans). One central volleyball court and horseshoe pit area are also proposed. An 11,050 ft² indoor recreation and community facility is also proposed to host weddings, family events, campground functions, and play soccer, pickleball and archery.

The campground stalls are proposed to be seasonal lease lots for the duration of the summer (May 1 – October 15).

The developer is requesting a relaxation of the road and trail standards. The developer is proposing hard surfaced (recycled asphalt) roads and internal trails, whereas the County's *Land Use Bylaw and Standards Manual* requires paved roads and trails. The proposed construction standard for the regional trail through the adjacent Municipal Reserve has not been provided by the applicant.

The proposed hours of operation are 7 days/week, May 1 – October 15 (weather depending), 7 am to 10 pm.

The campground will be connected to the existing communal water and sewer system, and will provide 50 amp power to each stall.

The proposed development will have 2 resident on-site employees, and 3 non-resident off-site employees.

The developer estimates the proposed campground will generate approximately 50-150 vehicle trips per day, however, this estimate may be low as discussed under the heading of “County Department Circulation”. There are 120 proposed visitor parking stalls in the campground expansion area, as well as 60 proposed parking stalls at the community facility/indoor recreation facility.

The developer proposes two bypass lanes on the main access road, the structure matching the existing road structure.

All trees are to remain except for roadway and parking pad construction.

The developer proposes winter storage for RV units on campground stalls, with all other recreational vehicles such as boats, seadoos, snowmobiles, etc being stored in the on-site storage compound.

The developer indicates the existing rules and regulations are working in a positive manner, as there have been no complaints received by neighbouring residents. However, there were concerns raised during the pre-application community consultation process, as discussed below.

POLICY CONSIDERATIONS

The development is considered a “major campground”, which is a discretionary use under the Recreational Vehicle Resort ‘R-RVR’ District of the County’s *Land Use Bylaw* and requires the approval of the Municipal Planning Commission.

A major campground is defined as an “area which has been planned and improved for the seasonal short term occupancy of more than twenty (20) holiday trailers, motor homes, tents, campers or similar recreational vehicles, and is not used as a year round storage, or accommodation for residential use. Typical uses include tourist recreational vehicle parks, campsites and tenting grounds and recreational activities, such as picnic grounds, boating facilities and playgrounds.”

The applicant of a major campground application shall undertake community consultation prior to an application being made to the County by pre-circulating to adjacent landowners within a 0.5-mile radius (*Land Use Bylaw Policies 3.4(7) and 3.4(7)(a)*). The applicant is required to submit a summary of their community consultation with the application outlining neighbours concerns and how these concerns will be addressed or why they cannot be addressed.

Paved roads and trails are a requirement of the *Land Use Bylaw* and the County's *Standards Manual*. The developer is requesting a relaxation of these standards to hard surfaced (recycled asphalt) roads and internal trails. It is unknown at this time what the intended construction standard is for the regional trail through the adjacent Municipal Reserve.

The property is located in the *Gull Lake Intermunicipal Development Plan (IDP)*. The County's *Land Use Bylaw* requires new campgrounds within the IDP plan area to be located in the Recreational Vehicle Resort 'R-RVR' District or Recreation 'PR' District.

CIRCULATION RESPONSE

DEVELOPER PRE-CIRCULATION

Delta Land Co. Inc. has advised property owners within ½ mile radius of the proposed development. Eleven (11) responses were received during the pre-circulation, attached as **Appendix B** for the Municipal Planning Commissions' consideration.

Concerns received from adjacent property owners include:

Amenities

- capacity of existing and future proposed amenities with additional residents/leaseholders,
- additional congestion at the existing public amenities (beach, boat launch, parking lots),
- additional congestion at the existing developer amenity (marina),
- lack of parking space at the beach and boat launch,
- lack of paved trails to connect internal amenities and create safe opportunities for pedestrian access,
- lack of paved trails to be accessible for all (ie. wheelchair and scooter friendly access),

- lack of paved trails to connect to adjacent communities, namely the Town of Bentley, and create safe opportunities for pedestrian access,
- lack of proposed golf cart paths within the resort,
- inability of the developer to deliver promised and advertised amenities (golf course, clubhouse, swimming pool), while at the same time proposing expansion of the campground,

Traffic

- capacity of existing transportation route with additional traffic,
- developer underestimation of the traffic impact of the proposed 275-stalls,
- non-paved roads in existing campground
- lack of vehicular access points to Range Road 1-1 (both for normal traffic and emergency access)

Safety and Security

- safety and security of existing lots and residents/leaseholders,
- developer compliance with OH&S standards for construction areas,
- safety/evacuation planning,
- fire suppression planning,
- medical emergency planning,

Environment

- environmental impacts of proposed development on lake,
- engineering plans for water runoff,

Water/wastewater system

- ability of the water/wastewater system to handle extra capacity and how that private system will be managed by the developer,

General

- developer accountability and trust,
- inability of the developer to communicate with residents/leaseholders,
- lack of completion to the standards proposed for Phases 1-4 of the campground, and
- lack of developer transparency and developer enforcement of rules in place for seasonal leaseholders.

DEVELOPER PROPOSED MITIGATION

Individual responses were not provided from the developer to the concerned adjacent property owners. The developer's pre-circulation summary included the developer's response to the County regarding concerns as follows.

"Water/Sewer system

- The approved Water/Sewer system has been engineered to be upgraded as required in phases. This past summer during the extreme heat wave the second water well was brought on line and there were no volume issues after that. This addition of the second well has the capacity to supply Sandy Point at full build out as originally engineered. The sewer system also underwent an expansion this past fall to increase capacity to accommodate the additional usage.

Trail Systems within Sandy Point

- The trail system around the perimeter of Sandy Point between the lots and the lake is to be completed to a paved standard at the time phase 5 of the Resort is constructed (As per Lacombe County Development Agreement). At this time the trail is maintained by Lacombe County to a mowed standard. This trail starts at the South corner of the property and extends to the light house. An additional paved trail will be constructed from the beach to the North end of the property at completion of the Campground Expansion. This trail system is owned and operated by Lacombe County and is dedicated as Municipal Reserve Lands.

Lacombe County Main Road & RR11

- The Main access road leading from RR 11 to the lighthouse will have 2 turning lanes added (as shown in the application) to ease congestion turning into the Beach and Campground areas. This was done at the request of Lacombe County.

Emergency vehicle Access/Exit

- The Campground expansion will include the addition of a second entry/exit road as shown in the drawing sent in the package. This allows for numerous access/exits to the Main Road and RR11 including the additional emergency exit road at the South end of the Resort.

Storm Water Management

- An approved, engineered Storm Water Management Report is required in order for Lacombe County to approve the application.

The main concern voiced from our lot owners was the traffic flow into and around the facility. We strongly believe that by adding the 2 turning lanes to the main road will help alleviate congestion around the beach and campground accesses.”

AGENCY CIRCULATION

Lacombe County circulated the application to the Summer Village of Gull Lake, Summer Village of Parkland Beach, and Ponoka County. No comments were received at the time of writing.

COUNTY DEPARTMENT CIRCULATION

The County’s Operations Department was circulated the application, and responded with comments and concerns as follows:

- The developer notes 50-150 vehicles per day during the summer. Operations believes this number to be a low estimate. According to the 7th Edition of the Trip Generation handbook, a conservative estimate would be 4 trips per site, per day. This equates to approximately 1100 trips per day to be expected at peak times.
- The 60 parking stalls for the ‘arched rib structure’ is acceptable, though any further development at the recreation site could affect this moving forward.
- The cross section shown through the lots, roadways, green spaces and trails in the campground is acceptable with the exception that the surfacing needs to be changed to a paved finish from recycled asphalt in order to be consistent with the County’s *Land Use Bylaw and Standards Manual*.
- A cross section for the trail through the Municipal Reserve is still required. The alignment of the regional trail is accepted as shown and is to be built to County standards.
- There is no mention of the amount of visitor parking stalls, though based on the layout being comparable to the first stage of the campground, it appears visitor parking will be adequate.
- The developer has proposed two bypass lanes on the main road into the resort in lieu of a traffic impact assessment (TIA) for this localized area, which Operations accepts to address any potential traffic issues in this area.

The structure is to match the adjacent road structure. A TIA may be required for future development at the resort.

- The developer has provided a stormwater management report for proposed development, however at this time it is considered insufficient as it states the proposed development includes ‘non-paved roadways’ or ‘gravel roads’, while Lacombe County’s standard requires paved roadways.

The County’s Fire Chief was circulated the application, and had no additional comments or concerns with the application providing the Lacombe County standards for roadways within the campground are maintained in order to allow for emergency vehicle access.

ANALYSIS

The proposed campground is considered a discretionary use within the Recreational Vehicle Resort ‘R-RVR’ District, therefore Municipal Planning Commission approval is required.

The proposed campground stalls are intended to replace condo units originally planned within Stage 2 of the overall development. Therefore, this proposed development would not increase the original units approved in the signed Development Agreement for Sandy Point RV Resort. However, Section 29.2 of the existing Development Agreement (October 14, 2010) outlines that the developer acknowledges that the County reserves the right to renegotiate this development agreement prior to the commencement of any development of Stage 2 (the location of this proposed campground development). A further Development Agreement may therefore be required of the developer at this time.

While the lands have been rezoned to accommodate a development similar to the proposed campground, staff are not satisfied with the proposed infrastructure and servicing standards contained within the proposed development application. Primary concerns include increased pedestrian traffic with lack of compensatory measures, undue interference with the amenities of the neighbourhood, non-compliance with the County’s required standards for roads and trails which increases the potential for unsafe interactions between pedestrians and vehicles, and inadequate stormwater management.

The developer has demonstrated a lack of regard and compliance with County requirements. It is noted the developer is currently in non-compliance with Policy 3.1(1) of the Lacombe County *Land Use Bylaw*, which states:

No development other than that designated in section 3.2 shall be undertaken within the County unless an application for it has been approved and a development permit issued.

The proposed development has commenced construction without County approval, demonstrating a lack of regard and compliance with County requirements.

During pre-circulation, adjacent property owners voiced a number of concerns with the proposed development, and the developer has not proposed sufficient mitigative measures to address those concerns.

In addition to adjacent property owner concerns, the Asini Wachi Nehiyawak Traditional Band/Bobtail Descendants (and Heritage Database Consulting Ltd.) has voiced concern with potential archaeological artifacts adjacent to the proposed development, and have requested a delay of approval on the proposed development until the Province of Alberta has completed and delivered their recommendations on the status of the crown archaeological site. The Province of Alberta has indicated that they will be conducting a site inspection in the coming spring months.

Any affected parties may appeal a decision made by the MPC. If appealed, the appeal lies with the Land and Property Rights Tribunal (LPRT), as the proposed development is subject of a licence, permit, approval or other authorization granted by the Minister of Environment and Parks.

STAFF RECOMMENDATION

Staff recommend the Municipal Planning Commission REFUSE the application, for the following reasons:

1. The proposed development does not adequately address planning concerns with increased pedestrian traffic. The increase in pedestrian traffic on local roads has already been noted with previous phases, leading to safety concerns regarding interactions between pedestrians and vehicles. Without the provision of sufficient compensatory measures, which the developer does not propose to undertake, the additional increase in pedestrian traffic from an additional 275-stalls would unduly interfere with the safety of pedestrians.

The community reiterated the planning concerns with inadequate trail systems, increased pedestrian traffic on roadways, and lack of safety for pedestrians during consultation.

2. The proposed development would unduly interfere with the amenities of the neighbourhood. The existing public amenities (beach, parking lots and boat launch) are noted to already be at capacity during the busy summer months with the existing phases. Without the provision of sufficient compensatory measures, the increase in users seen from an additional 275-stalls would create additional congestion at these public amenities and unduly interfere with the use of and enjoyment of the existing public amenities.

The community reiterated the planning concerns with capacity at the beach and boat launch and continued enjoyment of these public amenities during consultation.

3. The proposed development does not comply with the standards for campground roads, internal trails, or regional trails as outlined in both the County's *Land Use Bylaw* and the County's *Standards Manual*, as well as it does not comply with requirements under the existing signed Development Agreement.

Section 6.21 of the County's *Land Use Bylaw* states "*roads shall be hard surfaced or surfaced to the satisfaction of the Development Authority and shall be: (i) 3.05 m (10 ft) in width for one-way traffic; and (ii) 6.10 m (20 ft) in width for two-way traffic*".

Section 6.21 of the County's *Land Use Bylaw* further states "*walkways with a minimum width of 1.62 m (4 ft) surfaced to the satisfaction of the Development Authority shall be provided from all stalls to all service buildings and facilities, refuse areas and recreation areas*".

The County's *Standards Manual* refers to paved road and trail standards: Drawing C-8 - RV Campground Primary Road; Drawing C-9 - RV Campground Arterial, Cul-de-sac or Single Access Road; Drawing F-1 Local Trail; and Drawing F-2 Regional Trail.

The existing signed Development Agreement Schedule C states the following regarding trail condominium common property facilities at Stage 2:

“regional trail link with beach area within Municipal Reserve to northwest edge of plan area in stage two:

- two staging areas including;
 - Two picnic tables,
 - Two park benches, and
 - At least two garbage receptacles”

The proposed roads and internal campground trails are shown as ‘hard surfaced (recycled asphalt)’ on the proposed site plan. The trail within the Municipal Reserve adjacent to Stage 2 does not have a construction standard indicated on the drawings provided, nor does it show amenities such as picnic tables, park benches, or garbage receptacles. It was noted that when requested to add these details to the drawings, the developer wished to proceed with the application as presented without those details. The developer has not provided a satisfactory reason for waiving or relaxing the applicable standards.

The community reiterated the planning concerns with non-paved roads and trails during consultation.

4. The proposed development does not adequately address planning concerns with stormwater management. The developer’s submitted stormwater management report (Technical Memorandum re Sandy Point Stage 2 Stormwater Management, SNC Lavalin, February 8, 2022) was prepared under the assumption the proposed development included ‘non-paved roadways’ or ‘gravel roads’, therefore the stormwater management plan does not sufficiently describe how storm water runoff will be managed in terms of both runoff rates and volumes, and water quality.

The community reiterated the planning concerns with drainage and stormwater management concerns during consultation.

STAFF RECOMMENDATION AS ABOVE

If the Municipal Planning Commission is considering to REFUSE the application as outlined above, staff recommend the following motion be DEFEATED:

That the Municipal Planning Commission approve Development Permit Application No. 18/22 submitted by Delta Land Co. Inc. for permission to develop a 275-stall campground and 11,050 ft² community facility/indoor

recreation facility on Lot 8 Plan 982 4271 (Pt. NE 01 and SE 12-41-01-W5M) at Sandy Point RV Resort on Gull Lake.

ALTERNATIVE

If the Municipal Planning Commission is considering to APPROVE the application, staff recommend the following motion be CARRIED which would allow staff time to develop proposed conditions of approval:

That the Municipal Planning Commission defer Development Permit Application No. 18/22 submitted by Delta Land Co. Inc. for permission to develop a 275-stall campground and 11,050 ft² community facility/indoor recreation facility on Lot 8 Plan 982 4271 (Pt. NE 01 and SE 12-41-01-W5M) to the April 28, 2022 Municipal Planning Commission meeting.

MPC DECISION

PREPARED BY: Cajun Paradis, Senior Planner



REVIEWED BY: Dale Freitag, Director of Planning Services



REVIEWED BY: Tim Timmons, County Manager

