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Kneehill County  
Box 400  
Three Hills, AB  
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March 4, 2024

**ATTN:** Barb Hazelton, Manager of Planning and Development, Kneehill County

**RE:** Application for land use redesignation from Agriculture and Local Rural Commercial District to Direct Control District 7 and Direct Control District 8 and adoption of a Master Site Development Plan to facilitate the development of a new Integrated Waste Management Facility for lands legally described as the full quarter section of 2-29-24 W4M, excepting the Norquay Road Plan, and SW 1-29-24 W4M.

Dear Ms. Hazelton,

Waste Connections of Canada Inc. (WCC) proposes to develop an Integrated Waste Management Facility (IWMF) in Kneehill County, Alberta. The IWMF is privately operated and includes collection, transportation, processing, recycling, treatment, and disposal of various types of waste generated by businesses, industry, commercial, institutional and agricultural operations, and residential communities. A portion of the IWMF includes a Class II landfills that are subject to strict provincial approvals and ongoing oversight, including posting financial security and filing annual reports. The day-to-day operations for a Class II non-hazardous landfill involve the progressive development of the site over multiple years while striving to maintain agricultural lands where possible.

To facilitate the IWMF, WCC is seeking to redesignate the subject site into two Direct Control (DC) land use districts. DC districts provide Council "direct control" over development. The DC Bylaws' permitted use category lists a number of uses that are principally required to operate a landfill, and are generally approved by Alberta Environment and Protected Areas (AEPA). The discretionary uses category of the DC Bylaws includes uses considered ancillary to the IWMF operation and are generally at the discretion of the municipality to approve. The DC 7 District covers the portion of the site dedicated to the uses required to operate a landfill and its critical infrastructure, including the primary permitted use, a landfill facility, as well as ancillary discretionary uses such as a scale house, administrative offices, recycling collection point, and storage and maintenance buildings. The DC8 District covers the remainder of the site and includes permitted and discretionary uses largely similar to those listed in the DC7 District, but it does not include a Class II Waste Management Facility. Council has the discretion to set the development standard on discretionary uses in both districts. The two DC Bylaws, coupled with a Master Site Development Plan (MSDP), aim to create the planning framework to support the IWMF, while providing Kneehill County with a detailed overview of the proposed uses and processes.

A DC District is a planning tool, subject to Council's direction and control. They are used to regulate specific developments that do not fit into existing standard land use districts. An IWMF is an example of such a unique use. We recognize that Waste Management Facility is listed as a discretionary use in some of Kneehill County's land use districts; however, there are other uses listed in these districts that do not align with the intent of a waste management facility. Therefore, the DC Districts were developed to guide the uses specific to the IWMF. The DC Districts provide some flexibility over the duration of the project, allow for tailored regulations to address the unique uses, and encourage innovation over time as technology

advances. The DC Bylaws also balance the interests of local landowners, the community, and WCC by ensuring that the IWMF meets specific municipal and provincial standards while considering broader public interests. WCC will also establish a Community Enhancement Fund in collaboration with Kneehill County and community members, which will be allocated to services and resources in Kneehill County that serve its residents.

The Master Site Development Plan (MSDP) is another planning tool that outlines a comprehensive framework to describe the components of the project and the approvals pathways. This MSDP provides a detailed breakdown of the municipal and provincial regulatory process to demonstrate how the uses in the two DC Districts will be implemented and managed. For instance, the permitted uses listed in the DC 7 District are those principally required to operate a landfill facility, and generally approved by AEPA with conditions.

Finally, WCC appreciates that waste management facilities are long-term developments of significant tenure. Stakeholders can be certain that WCC is committed to a true community partnership, and will work with local organizations and local businesses, and continually engage with stakeholders to ensure they remain an active partner. WCC values employees, expects the highest standards from the leadership team, and seeks to give back to the local communities where their facilities are located.

Sincerely,  
**Township Planning + Design Inc.**



Kristi Beunder, B.A., M.E.Des.  
RPP MCIP  
Senior Planner / Principal  
**Urban + Regional Planning**

Cc: - Dan Rochette, Waste Connections of Canada