

Appeal of Development Permit DP073108

65 Carlton Drive, Campbell Industrial Park

Presented by:

Gary Acheson

Sarasota Homes + Realty

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Purpose of Appeal

We are formally appealing the approval of Development Permit DP073108

- Core Issue – Static Analysis vs. Foreseeable Reality
- Attendance Assumptions – Unreasonably Low Presented Through Application + TIA
- Failure To Consider Growth + Peak Demand
- Parking Analysis Bases On Incomplete Buildout of the Business Park
- Realistic On-Street Parking Capacity Is Lower than Presented
- Foreseeable Outcome and Concerns – Excessive Parking Overflow
- Critical Omission in TIA – No Pedestrian Traffic Analysis
- DeFacto Change to Campbell Business Park Resulting in Planning Impact Without Proper Consultation and Review Process Being Followed

CAMPBELL INDUSTRIAL PARK MAP

- - INTENDED OVERFLOW PARKING
- 400m



- - Actual overflow parking



Intended Use of Campbell Industrial Park

Campbell Industrial Park was developed by the City of St. Albert around 2007 as a **light industrial park (BP2 zoning)**.



It was designed to support:

- Heavy commercial and industrial vehicle traffic
- Business and operational uses
- Minimal pedestrian activity

A Fundamental Shift in Use



The approved development introduces a use that requires **significant pedestrian activity**.

- This is not consistent with BP2 zoning
- It aligns more closely with BP1 (pedestrian-oriented use)

➔ *This represents a functional rezoning—without going through a rezoning process*

Infrastructure Is Not Designed for This Use



What this development creates

- Significant on-street parking
- Generates high pedestrian traffic
- Pedestrians forced into roadway

This introduces pedestrian volumes the district was not designed to handle

Real-World Traffic Impact (Existing Site)

This is happening today—with a much smaller facility



What This Footage Shows



■ Existing on street parking during worship hours
- 950m

March 27th Study - During gathering on Friday afternoon the traffic increased from 14 parked cars to 158 parked cars.

- Approximately **150+ vehicles** generated during peak times
- Vehicles lining streets and surrounding areas
- Increased congestion in surrounding roadways
- Spillover beyond designated parking areas
- Blocked or obstructed intersections + Emergency infrastructure

The new structure is intended to be 10x this size and parking is already a concern now

➔ *Traffic demand is already exceeding infrastructure capacity*

CAPACITY VS. TRAFFIC REALITY

The projected impact does not align with real-world data.



EXISTING REAL-WORLD DATA

- Current mosque size: **~2,100 sq ft**
- Generated: **Approx. 158 additional parked vehicles**
- Observed: **1.4 persons per vehicle resulting in approx. 220 people in attendance**

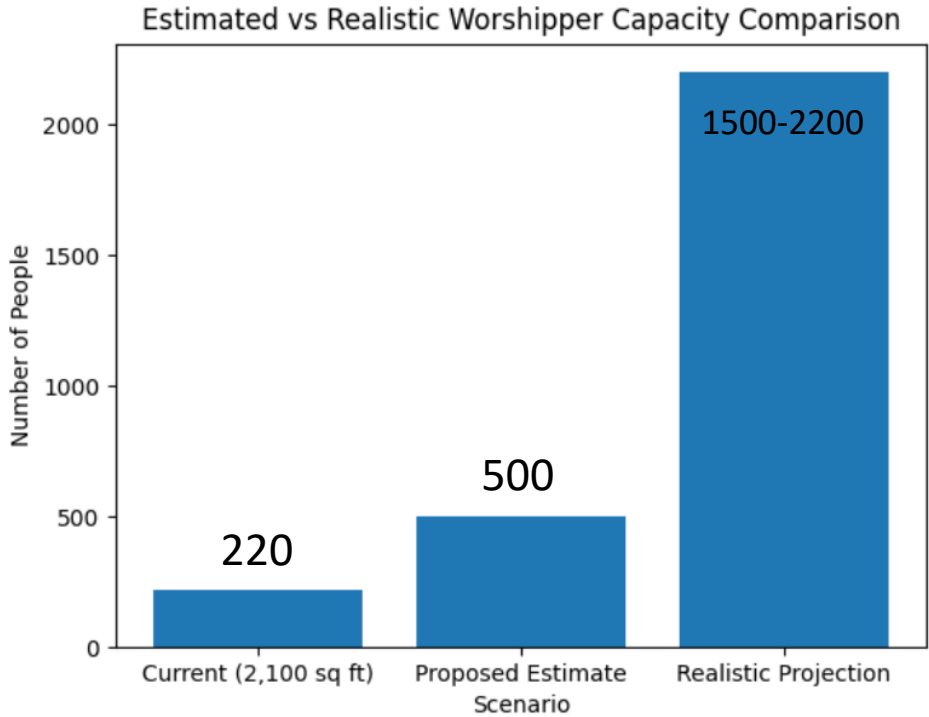


PROPOSED NEW MOSQUE CAPACITY

- 22,000 sq ft building can result in **1,500–2,000 potential occupants** vs. application suggesting **500 max capacity** (based off observation of gathering on March 27th this would result in an approx. estimate of 800 potential vehicles.
- Industry standard: **2–4 worshippers per m²**

The projected traffic does not reflect realistic usage—impact will be substantially higher.

Observed vs Projected Impact



The existing 2,100 sq ft space is already generating approx. 158 vehicles extra vehicles estimating at 1.4 persons per vehicle results in approx. 220 people.

The proposed 22,000 sq ft development is projected at only 500 persons—but based on real-world use, and comparison to the current location sqft we can anticipate upwards of 10x – approx. 2,200 people.

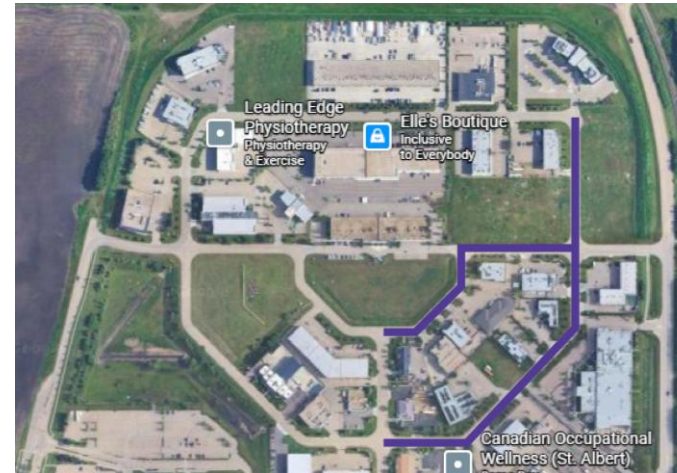
Therefore 500 people appears to be significantly underestimated.(Approx 232 vehicles)

ATTENDANCE ASSUMPTIONS ARE UNREASONABLY LOW

- The TIA assumes a maximum attendance of approximately **530 persons**.
- However, this figure appears **unrealistically low** when compared to widely accepted planning benchmarks:
- Industry guidance suggests approximately **10.76 sq. ft. per person**
- Based on the building size (~22,200 sq. ft.), this indicates a potential capacity of approximately **1,200+ persons**
- Other comparative benchmarks suggest **1,500–2,000 attendees** for facilities of this scale
- While actual attendance may vary, these benchmarks demonstrate that:
530 represents a conservative snapshot, not a realistic upper-bound scenario

DEFICIENCIES IN TRAFFIC ASSESSMENT

This study miss represented the capacity taken in October of 2025 with 22% of vacant land still not developed.



The traffic impact assessment relies on static assumptions and does not account for foreseeable future demand, resulting in a material underestimation of attendance, parking demand and pedestrian impact.

Conclusion:

When realistic assumptions are applied, parking demand exceeds supply and overflow is inevitable.

Predictable Outcomes



The development will likely result in:

- Vehicles parked in front of fire hydrants
- Blocked or obstructed intersections
- Reduced visibility for drivers
- Increased congestion

These outcomes are not hypothetical—they are expected.

Increased Risk Exposure



This situation introduces:

- Elevated risk of collisions
- Increased danger to both pedestrians and drivers
- Potential liability for:
 - Business owners
 - Vehicle operators
 - The City

Immediate Public Safety Concerns



The area currently has:

- No sidewalks (intentional for commercial area)
- No pedestrian pathways
- No protected crossings

Pedestrians would be forced:

- Share space with dump trucks, trailers, commercial vehicles
- Walk between parked cars
- Have direct conflict with traffic

➔ *This creates unavoidable and dangerous interaction*

Infrastructure + Cost Impact



- No sidewalks currently exist
- Would require 5.4km of sidewalks
- Cost = Approx. \$3,000,000
- Only – Approx. 100 legal stalls gained

Significant public cost to support incompatible use.

Seasonal Risk (Critical in Alberta)

Winter conditions significantly increase risk:



- Snow accumulation narrows roadways
- Pedestrians are pushed into driving lanes
- Reduced visibility and longer stopping distances

Impact:

Risk of serious injury or fatality increases substantially.

Emergency Access & Fire Safety Concerns

Excessive street parking is not an inconvenience—it's a safety issue.



DELAYED RESPONSE TIMES

Blocked and narrowed roadways make it difficult for emergency vehicles to reach incidents quickly.

INCREASED RISK TO LIFE & PROPERTY

Every delay can escalate an emergency, increasing potential harm and damage.

OBSTRUCTED FIRE HYDRANTS

Parked vehicles can block critical water access when seconds matter most

LIMITED MANEUVERABILITY

Fire trucks and ambulances require space to operate—congestion restricts their ability to respond effectively

From an Industry Operator

As an operator of tandem dump trucks with trailers:



- Large turning radiuses are required
- Limited visibility is a factor
- Stopping distances are significant

These vehicles are not designed to safely operate in pedestrian-heavy environments.

Procedural Fairness



Concerns regarding the approval process:

- No meaningful stakeholder consultation
- Significant land-use shift without engagement
- Lack of transparency in decision-making

The approval does not include:

- Sidewalks
- Pedestrian safety measures
- Traffic mitigation strategies

Development requiring pedestrian activity was approved without necessary infrastructure.

This Decision Is Permanent



- Once constructed, impacts cannot be reversed
- Sets precedent for incompatible future uses
- Locks in long-term safety and operational challenges

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Requested Outcome

We Respectfully Request Denial of Development Permit DP073108 based on the following:

- Incompatibility of development permit with Campbell Industrial Park BP2 Category
- Capacity mismatch between the site needs and Campbell Industrial Parks ability to serve
- The TIA underestimates the true impact of the development on a foreseeable basis and should not be relied upon as sufficient basis for approval
- DeFacto change to Campbell Industrial Park BP2 Category without proper process

Thank you for your time

1.CORE ISSUE

STATIC ANALYSIS VS. FORSEEABLE REALTIY

The Traffic Impact Assessment (TIA) relied upon by the City contains material limitations in both methodology and assumptions, which result in an underestimation of future demand and impacts.

Specifically, the study:

- Relies on static, point-in-time observations, and
- Does not adequately consider foreseeable future conditions or peak demand scenarios


FAILURE TO CONSIDER GROWTH + PEAK DEMAND

- The TIA evaluates conditions based on a **single moment in time**, rather than:
- Peak attendance periods (e.g., weekly congregational events)
- Future growth of the facility
- Increased attraction over time as the facility becomes established
- A development of this nature should be evaluated based on:
 - 👉 **Reasonably foreseeable peak demand—not minimum or initial use**

PARKING ANALYSIS BASES ON INCOMPLETE BUILDOUT

- The parking analysis is similarly limited by its **point-in-time methodology**:
- Conducted in **October 2025**
- Reflects a business park with approximately **25% undeveloped land**
- This is critical because:
- Vacant lots **do not generate parking demand**
- Future development will:
 - Increase on-street parking demand
 - Reduce available curb space (due to driveways, access points, etc.)
- 👉 Therefore, the study **overstates available parking supply**

REALISTIC PARKING CAPACITY IS LOWER

- Using more realistic assumptions:
- Actual curb usage \approx **8 meters per vehicle** (not 7m as assumed)
- Observed real-world usage closer to **8–9 meters per vehicle**
- Estimated total capacity reduces to approximately **350 stalls**
- Further:
- Typical business park utilization \rightarrow \sim 70% occupancy
- Leaves approximately **100 available stalls** under normal conditions
-  This is **significantly below what the development would require**

FORSEABLE OUTCOME SYSTEMIC OVERFLOW

- Given:
- Higher realistic attendance
- Reduced parking supply
- The foreseeable result is:
- **Parking demand exceeding capacity**
- **Overflow across the entire industrial park**
- Use of:
 - Private property
 - Restricted zones
 - Unsafe or illegal locations
- 🙌 This is not speculative—it is a **predictable outcome of the inputs**
-

CRITICAL OMMISION – NO PEDESTRIAN TRAFFIC ANALYSIS

- The TIA does not include any meaningful analysis of **pedestrian movement**.
- This is a significant omission because:
 - Parking shortages will force users to park **at increasing distances**
 - This generates **distributed pedestrian traffic throughout the park**
 - Pedestrians will travel through:
 - Active industrial roadways
 - Areas without sidewalks or protection
- 👉 The report fails to assess a **key impact directly caused by its own parking assumptions**

RESULTING PLANNING IMPACT – DEFACTO SHIFT

- When properly considered, the development will:
- Generate **high pedestrian activity**
- Create **conflict with large vehicle traffic**
- Functionally shift the area from:
 - **Low pedestrian (BP2)**
 - **To high pedestrian conditions**
- 👉 Without any corresponding infrastructure or planning adjustment

De Facto Change to District Function Without Proper Process

- The approval of this development permit has implications beyond the subject site. By introducing a use that generates **substantial pedestrian activity**, it effectively alters the functional characteristics of Campbell Industrial Park from a **BP2 (Low Pedestrian Traffic)** environment to one that operates, in practice, as a **higher pedestrian traffic area**.
- This represents a **de facto change in land use conditions**, without any corresponding amendment to the Land Use Bylaw or district classification.

CONCLUSION

- Relies on conservative, static assumptions
- Does not reflect realistic capacity or growth
- Overstates parking availability
- Omits pedestrian impacts entirely

As a result, it underestimates the true impact of the development, and should not be relied upon as a sufficient basis for approval

CAPACITY MISMATCH – SITE AND CAMPBELL INDUSTRIAL PARK

- SITE-LEVEL CAPACITY
- CAMPBELL INDUSTRIAL PARK – LEVEL CAPACITY (CRITICAL ISSUE)
- COMPARISON TO APPROPRIATE SCALE DEVELOPMENT
- FORESEEABLE OUTCOME