

Town of Bentley / Lacombe County Annexation
ANNEXATION APPLICATION & NEGOTIATION REPORT

*Prepared for the Alberta Land and Property Rights Tribunal pursuant to
Section 118 of the Municipal Government Act, RSA 2000, Chapter M-26,
as amended*



***Prepared by the Town of Bentley with assistance from
Parkland Community Planning Services***

June 2024



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EXECUTIVE SUMMARY

The Town of Bentley is located within Lacombe County, 19 kilometres west of the QEII highway. While the Town's population has been stable over many years, a desire for continued viability has led the Town to work collaboratively with Lacombe County to develop sustainable and economical future growth.

The Town and County have developed an Intermunicipal Development Plan (IDP) in 2009 which was updated in 2018, followed by a new Southeast Bentley Area Structure Plan to create opportunities for commercial and industrial development. This ASP was adopted by Lacombe County in November 2023, and it defines the area that is the subject of this annexation proposal. The County recognizes the Town's need for annexation.

The Town of Bentley Annexation Application and Negotiation Report has been prepared in accordance with Section 118 of the *Municipal Government Act (MGA)*. This report provides understanding and rationale for the Town's proposed need for annexation, presents the direction for long-term future growth,

The Town proposes to annex approximately 92 hectares comprising titled lands and a non-titled road allowance. The Town submitted its Notice of Intent to Annex to Lacombe County in March 2024. Letters and information about the Town's proposed annexation were sent to the affected landowners, stakeholders and referral agencies.

This process effectively started with the adoption of the updated IDP in 2018. The Town of Bentley subsequently applied for Alberta Community Partnership funding in 2021 to prepare the Area Structure Plan and undertake the annexation process. The Town is a member municipality of Parkland Community Planning Services, and PCPS has served as the planning consultant.

This project has been overseen by the Bentley/Lacombe County IDP/ICF Committee comprised of council members from each municipality.

Extensive public engagement has been part of the process from the beginning. Including the public hearing for the Southeast Bentley Area Structure Plan, there have been four public meetings, two online surveys, and numerous meetings and conversations with members of the public and the landowners.

The Town continues to work collaboratively with Lacombe County to ensure the annexation process and Intermunicipal Development Plan is successful in sustaining its long-term planning visions. While this annexation process was planned as part of the project that started in 2021, commencement of the annexation process began in January 2024. Over the course of the past four months, the two municipalities have undertaken one-on-one landowner meetings and public consultation initiatives and engaged in negotiation discussions.

The Town and County have reached an agreement on the terms for annexation. This report sets out the terms of the annexation agreement, including the agreed upon conditions and the proposed effective date of January 1, 2025, for the annexation.

INTRODUCTION

The Town of Bentley is requesting approval of this annexation application to be able to address the community's long-term future commercial and industrial growth needs in a rational and orderly fashion. The addition of lands to the Town has been the topic of mutually beneficial discussions between the Town of Bentley and Lacombe County. Consultations with landowners, the general public and other local authorities were undertaken as part of the overall process to discuss the proposal and to identify concerns along with means of addressing impacts.

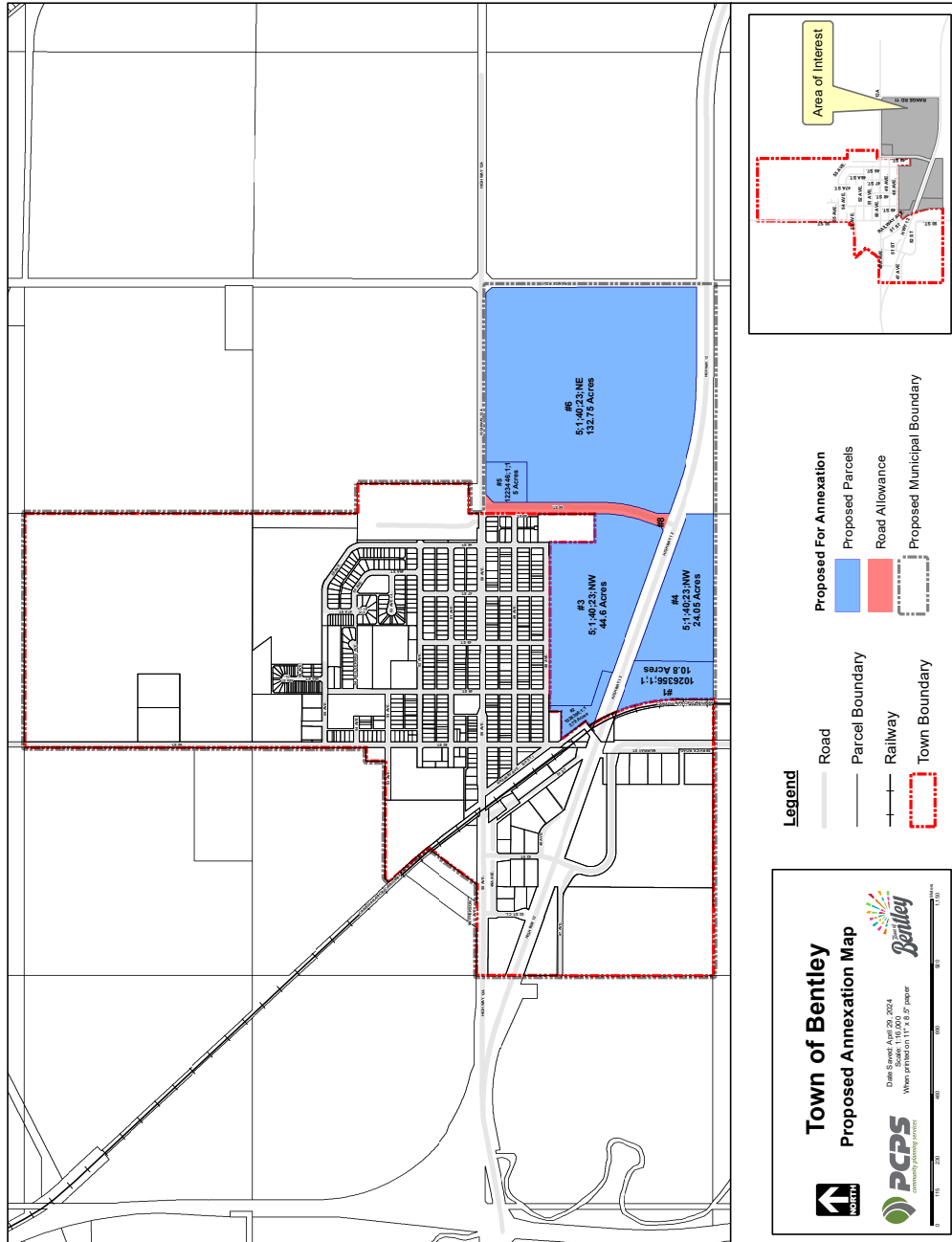
The purpose of this Annexation Report is to document the process that has been followed and formally present the Town's request to the Province. It includes:

- A description of the lands proposed to be annexed in this application;
- The Town of Bentley's reasons for pursuing the annexation application;
- Background on historic population and economic development efforts in Bentley;
- A description of the relationship between the annexation proposal and approved statutory plans;
- A description of the intended uses proposed for the annexation lands and the ability to extend municipal services;
- A list of the matters agreed upon and those on which no agreement was reached between the Town of Bentley and Lacombe County;
- A description of the consultation process for landowners, the general public and other local authorities that was used in the negotiations and in preparing the annexation application;
- A summary of the views expressed during the consultation process with landowners, the general public, and other local authorities;
- Actions proposed by the Town of Bentley in response to issues raised through the consultation process;
- A financial analysis of the impact of annexation on the Town of Bentley and Lacombe County; and,
- An overview of compliance with the annexation principles established by the Municipal Government Board/Land and Property Rights Tribunal.

LANDS PROPOSED FOR ANNEXATION

The Town of Bentley and Lacombe County have agreed to the annexation of lands as identified in Figure 1. The total amount of land proposed to be annexed is approximately 221 acres (89 hectares) of titled lands, plus non-titled road allowances and rights of way.

Figure 1: Town of Bentley Annexation Area



The lands proposed to be annexed are described below through legal descriptions, approximate areas and their general location relative to the present Town boundaries. The areas proposed to be annex include approximately 89 ha of titled land and approximately 2.7 ha of road right-of-way. A copy of the annexation map identifying each owner with the corresponding parcel of lands is included in Appendix A. Appendix B includes current copies of the land title for each of the proposed annexation parcels.

REASONS FOR ANNEXATION

There are four primary reasons for the Town's proposed annexation. These reasons relate to the implementation of key directions of the Town of Bentley / Lacombe County Intermunicipal Development Plan and the practical planning considerations for positioning the Town to plan for and attract a range of commercial and industrial developments.

1. Collective Vision

The Annexation Area is within the Urban Expansion Boundary described on Map 2 of the Town of Bentley / Lacombe County Intermunicipal Development Plan. This proposed annexation reflects the logical next step for what was already agreed upon and set as the future vision through extensive intermunicipal collaboration.

The Town of Bentley/Lacombe County Intermunicipal Development Plan includes clear policies intended to support commercial and industrial development in the Bentley area, and to pursue joint initiatives in this regard.

An Area Structure Plan for the Annexation Area (the Southeast Bentley Area Structure Plan) has already been prepared and adopted by Lacombe County. The lands remain under County jurisdiction at this time.

The proposed annexation represents a logical expansion of the urban area of the Town. Residential development is expected to occur on lands in the north part of Bentley that are currently within the Town boundary, and on lands currently within the County to the north of Highway 12A in the future. The areas south of Highway 12A to the east of the Town, and along Highway 12 in the south are planned for commercial and industrial uses, in proximity to transportation corridors.

This is reinforced by external factors. Highway 12 carries more than 6,000 vehicles per day in the Bentley area, while the Government of Alberta has commissioned a functional planning study for the twinning of Highway 20 from Sylvan Lake to Rimbey and passing just west of Bentley, to accommodate future growth in the region. Additionally, there has been significant growth in Sandy Point (Lacombe County), Blackfalds, Lacombe, Red Deer, and Sylvan Lake, which points to an opportunity to leverage both residential growth and commercial and industrial growth.

2. Competitive Commercial Land Supply

While the Town has a generous supply of land intended for future residential development, it has no large blocks of land available to attract commercial development that require various parcel sizes. Based on a 2021 commercial land inventory, there are only five parcels available for commercial development. These parcels are located along the Town's main street within its downtown core. Moreover, the location and size of these parcels constrains the size and type of development that can be accommodated within the Town's traditional commercial area, leading to lost opportunities.

These constraints have affected the ability of the Town to attract a share of the economic growth in central Alberta. The Town recently experienced this in recent years when it was unable to accommodate a culinary school and bakery due to the shortage of its commercial land supply. The Annexation Area will provide the Town a competitive land supply to attract commercial development.

In particular, the proposed annexation creates a significant opportunity to attract highway commercial development in proximity to Highway 12, a form of development which is not suited for the downtown.

3. Industrial Land Supply

The Town has a very limited supply of industrial land for development. The ability to attract industrial development depends on the availability of designated and serviced blocks of lands of varying sizes. However, the Annexation Area can accommodate a well-planned industrial area that provides flexible parcel sizes to attract industrial development at various scales. The Annexation Area would also provide the Town the opportunity to respond to industrial proposals within the region.

4. Preparation for Future Planning and Development

A detailed area structure plan (ASP) to guide the development of the annexation area was developed in 2022 and 2023 and was approved and adopted as Bylaw 1397/23 by Lacombe County Council in November 2023. This process was guided by the Town of Bentley/Lacombe County Intermunicipal Committee.

Background work included an environmental review, along with servicing and transportation studies.

The development of the plan included public meetings in November 2022 and June 2023, an online survey, numerous meetings and conversations with landowners and interested individuals, and a statutory public hearing held in October 2023.

The planning process has been funded through an Alberta Community Partnership (ACP) grant, with Parkland Community Planning Services acting as a planning consultant to the Committee. The Town of Bentley is the managing partner for the grant. It was the stated intention of the parties from the beginning for the Town of Bentley to apply to annex the area that is now the subject of the ASP.

The Southeast Bentley Area Structure Plan is presently a statutory plan of Lacombe County. Should the annexation be successful, the ASP would receive some minor amendments and be recommended for re-adoption as a statutory plan of the Town of Bentley.

If the annexation is not successful, the ASP would remain as a County planning document, and a Joint Economic Area (JEA) agreement between Town and County would be pursued, consistent with the 2018 Intermunicipal Development Plan.

In summary, the proposed annexation would provide the Town with the commercial and industrial land inventory needed to attract new economic activity and to support the long-term viability and sustainability of the community and meet the growing needs of the central Alberta region. The area proposed for annexation is suitable for commercial and industrial development, adjacent to the Town, and can be readily serviced.

RELATION TO STATUTORY PLANS

The proposed annexation is consistent with the overall direction and policies of the Town of Bentley/Lacombe County Intermunicipal Development Plan, the Town of Bentley Municipal Development Plan, and the jointly developed Southeast Bentley Area Structure Plan approved by Lacombe County. The policies of each of these documents pertaining to annexation are summarized below.

The focus of this annexation proposal is land for commercial and industrial development, with accommodation for cemetery expansion and a possible community recreation area. The Summersault Area Structure Plan provides a significant area for residential growth on the north side of Bentley.

Town of Bentley / Lacombe County Intermunicipal Development Plan

Adopted in December 2018, the Intermunicipal Development Plan (IDP) represents an update of an IDP originally adopted in 2009, and contains several goals and policies that provide direction for future expansion of the Town of Bentley.

The Economic and Joint Development policies of the IDP promote economic development by both municipalities, and requires both municipalities to work together to ensure a strong and stable diversified local economy. This is to be done by providing “a suitable inventory of lands for commercial and industrial development which includes a range of choice in terms of parcel sizes and servicing.”

The IDP is considered a very high-level policy document based on a thirty-year timeframe. The IDP anticipates the creation of Concept Plans and Area Structure Plans consistent with the IDP.

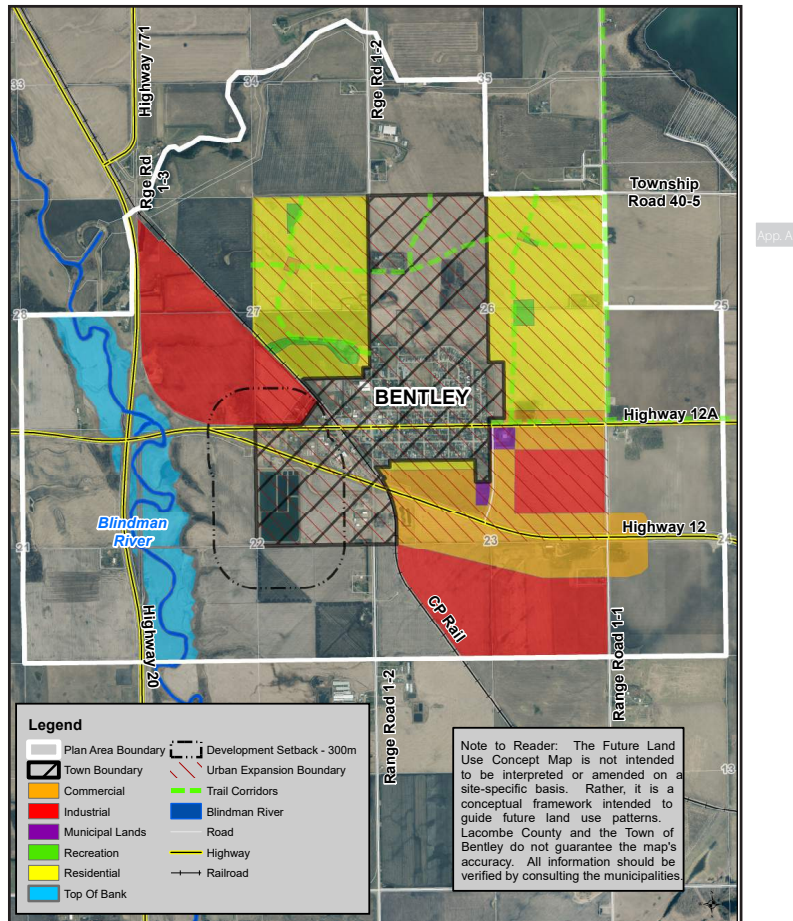
Land Use Patterns

The Future Land Use Concept of the IDP identifies areas for long term development in proximity to the Town of Bentley. This includes areas for future annexation by the Town, and areas for future industrial and commercial development within Lacombe County. These are shown in Figure 2.

At the present time, there are no plans for commercial and industrial development in the portion of the growth area reserved for the County. The Area Structure Plan approved in 2023 was to include the SW and SE of Section 23, but the landowners in this area were very clear on their long-term desire to continue to farm and live on the land as they do now, and the proposal was amended to remove these quarter sections.

Figure 2: Future Land Use Concept – Map 2 of Intermunicipal Development Plan

MAP 2 - FUTURE LAND USE CONCEPT MAP



Environmentally Sensitive Areas

There are no environmentally sensitive areas within the annexation area.

Background work for the Southeast Bentley Area Structure Plan showed wetland areas in the Southeast of Section 23; however, this quarter section was not included in the Area Structure Plan and is not part of the annexation area.

Municipal and Environmental Reserves

The Southeast Bentley Area Structure Plan describes future stormwater management, trails, and a potential community park within the annexation area. The details of these areas will be worked out through the subdivision and development processes.

Economic Development

The IDP recognizes the desire of the Town and County to promote a strong, diversified and sustainable economy that will provide employment opportunities and support community growth. To this end, the two municipalities agree to promote economic development within the IDP area, recognizing the needs of both municipalities and the area economy. This entails providing a land base and land use pattern capable of supporting a range of appropriate economic activities and the establishment of sustainable assessment bases capable of supporting desired levels of municipal services.

Specific policies of the IDP pertaining to the economic development goal include:

- Both municipalities shall work together to ensure a strong and stable diversified local economy within the broader regional economy;
- The Town and County shall ensure that the Plan provides a suitable inventory of lands for commercial and industrial development which includes a range of choice in terms of parcel sizes and servicing.
- The Town and County shall work together to explore areas of mutual interest. Where an area of mutual interest has been identified, the Town and County may consider negotiating a Joint Economic Agreement (JEA) respecting the orderly and coordinated provision of services and facilities to the area. This agreement may also outline a mechanism for the equitable distribution of tax revenue between each municipality respecting the lands within the identified area.
- While a broad range of commercial and industrial uses and development is desirable, those uses and developments which may detract from the community's character, quality of life for area residents or unduly impact the environment may not be permitted.
- The Town and County shall endeavor to work together to develop joint development initiatives, economic initiatives or other partnerships that are beneficial to both municipalities.

Urban Expansion and Annexation

The IDP sets out broad parameters for the two municipalities on how proposals for the expansion of the Town boundaries will be addressed. Specific policies include:

- Both municipalities shall protect those lands identified within the proposed Urban Expansion Boundary on the *Map 2 - Future Land Use Concept* from land uses and developments that might interfere or conflict with future urbanization.
- The Town shall not pursue annexation of any land it cannot economically and reasonably service.

- Either municipality or a landowner may put forward an annexation proposal or request. In the case of an annexation proposal by a landowner, the landowner shall simultaneously notify both municipalities in writing.
- Where annexation is proposed by either municipality, affected landowners shall be notified prior to the general public.
- Annexation proposals shall be reviewed by the Intermunicipal Committee prior to submission of a Notice of Intent to the respective Councils and the Municipal Government Board.
- If deemed necessary, a joint meeting of the two Councils shall be held to discuss the rationale for the annexation.
- In determining the appropriateness of an annexation proposal the following criteria, among others, shall be taken into account and documented in a supporting report:
 - a) Justification of the need for additional land based on projected growth rates reflecting historic trends or anticipated economic stimulus;
 - b) Availability and cost of providing municipal services including consideration of economies of scale related to the financing of municipal service extensions;
 - c) Adequacy of transportation system and ability to expand to accommodate demands resulting from annexation including consideration of economies of scale related to the financing of transportation infrastructure;
 - d) Landowner interest in pursuing development and as high a degree of concurrence among affected landowners as possible;
 - e) Measures to mitigate the impacts of annexation relating to such aspects as change in taxation levels, service provisions and treatment of and continuation of existing, approved uses and development;
 - f) Consistency with adopted statutory plans; and
 - g) Logical extension of jurisdictional boundaries including consideration of long-term responsibilities for maintenance and service delivery and the establishment of rational planning units.

Intermunicipal and Joint Economic Agreements

The Intermunicipal Development Plan (Policy 4.0) encourages collaborative economic development.

The goal of this policy is “To enhance economic opportunities by providing areas for a variety of development opportunities which may lead to a basis for future joint development by the Town and County of select areas that may be of mutual benefit and interest.”

Key policy directives include the following:

- Both municipalities shall work together to ensure a strong and stable diversified local economy within the broader regional economy.

- The Town and County shall ensure that the Plan provides a suitable inventory of lands for commercial and industrial development which includes a range of choice in terms of parcel sizes and servicing.
- The Town and County shall work together to explore areas of mutual interest. Where an area of mutual interest has been identified, the Town and County may consider negotiating a Joint Economic Agreement (JEA) respecting the orderly and coordinated provision of services and facilities to the area. This agreement may also outline a mechanism for the equitable distribution of tax revenue between each municipality respecting the lands within the identified area.
- While a broad range of commercial and industrial uses and development is desirable, those uses and developments which may detract from the community's character, quality of life for area residents or unduly impact the environment may not be permitted.
- The Town and County shall endeavor to work together to develop joint development initiatives, economic initiatives or other partnerships that are beneficial to both municipalities.

This language is reflected in the policies of Section 20 the Town of Bentley Municipal Development Plan, entitled "Intermunicipal Cooperation", which also provides policies respecting annexation.

Town of Bentley Municipal Development Plan

The current Town of Bentley Municipal Development Plan (MDP) was adopted in 2016 as By-law 188/2016.

Community Vision

The MDP is based on a broad community vision of the type of community Bentley wishes to become. The vision statement reads:

"As we look to the future we see the Town of Bentley as a community that offers residents a high quality of life that grows in a sustainable manner, that is safe, clean, attractive, friendly and family-oriented. The community benefits from its strategic location building on its strengths of being proactive in planning for economic growth in an environmentally responsible manner. Bentley celebrates community spirit where citizens are actively involved in shaping and guiding the future of the Community."

The Goals for the future of Bentley are:

- Responsible environmental management, socially, culturally and economically sustainable for future generations.
- A safe, liveable, and socially responsible community with a range of housing options and an attractive urban environment.
- A strong business district and the development of commercial and industrial areas which meet and service the needs of Bentley and district.
- The provision of safe, orderly, efficient and reliable transportation, infrastructure and public utilities throughout Bentley.
- Sustainable community, recreational, institution services and facilities which meet the needs of community and district residents.

- Public participation and collaborative planning with group agencies, institutions and governments to ensure accountability and transparency.
- Mutual respect and mutual recognition of the short and long term aspirations of the Town and Lacombe County

Annexation

The Bentley MDP provides policy direction on future urban expansion and annexations. These provisions include:

- The Town should avoid a large and complex annexation in favour of annexations involving smaller amounts of land occurring on an as-needed basis where the annexation area can be serviced with a logical and cost-effective extension of existing road and servicing networks.
- The periodic need for urban expansion through the annexation process should be logical and consistent with the policies of this Plan. Annexation shall be undertaken in a positive, orderly, timely and agreed-upon process where there is a clear and present need and development is expected to occur within a five (5) year period.
- The need for community expansion should be demonstrated, to the satisfaction of the County, that the conversion of rural land for urban expansion in areas adjacent to the Town is timely and will protect existing rural land uses from premature conversion to urban forms of development. Annexation shall follow legal boundaries or natural features to avoid creating a fragmented pattern of land ownership and should as much as possible have the support of the current landowners.
- Where it is necessary to expand the boundaries of the Town, expansion should be well-integrated with the existing community infrastructure and directed away from large acreages of prime farmland and livestock operations. Where growth warrants the expansion onto adjacent agricultural lands, the land requirement of the Town will take precedence over any existing agricultural use of these lands.

The proposed annexation fulfills these policy objectives. The proposed annexation is readily serviceable by way of extensions from the existing Town systems in a phased manner from west to east, is based on quarter section boundaries, avoids a fragmented pattern of landownership, and the policies of the Area Structure Plan ensure and promote continued agricultural use of the land until urban development occurs. While the area is large relative to the small size of the Town and would obviously provide more than a 5-year land supply, it involves only two primary parcels of land in one ownership and is supported by Lacombe County as a location for future commercial and industrial development to benefit the region. Further, the landowners are supportive, with their only concern being that the area will not fully develop for at least 25 years.

Southeast Bentley Area Structure Plan

The Southeast Bentley Area Structure Plan was a joint initiative of the Town of Bentley and Lacombe County, started in 2021. The Plan was completed and adopted by Lacombe County Council in November 2023.

The lands that are subject of this annexation proposal represent the entirety of the lands designated for future development by the Area Structure Plan. In addition to commercial and industrial uses, there are lands set aside for public uses including stormwater management, trails, cemetery expansion, and a possible community park. The existing Bentley District Fire Department is located within this area. Figure 3 to this report is the Future Land Use Concept from the Area Structure Plan.

If this annexation proposal is approved, the Area Structure Plan would be re-adopted, with appropriate modifications, as a statutory plan of the Town of Bentley.

RELATION TO HISTORIC AND PROJECTED POPULATION GROWTH

History and Regional Context

Bentley was founded as a community in 1901 with the establishment of a post office, and was incorporated as a village in 1915. The Lacombe Northwestern Railroad arrived in 1917, and the first railway station and the Alberta Pacific Grain Co. elevator were opened in 1918. Bentley was granted Town status in 2000.

Bentley plays a role as a local service centre. Located 19 kilometres west of the QEII Highway northwest of Red Deer, it is advantageously situated within the central Alberta. It is situated among of a number of communities that have experienced significant growth in recent decades, and which are poised for further growth as Alberta’s population continues to expand, especially in proximity to the Highway 2 Corridor.

Historic Population Growth

Over the 50-year period between 1961 and 2011, Bentley’s population grew from 608 persons to 1,132 persons (municipal census figures).

This equates to an annual average growth rate of 1.25% using a straight-line linear calculation method over the 50-year period.

From the 1960s through the 1980s, Bentley’s population grew at a modest but steady rate.

Over the past decade, the population has been stable, declining slightly, with the 2021 federal census showing a population of 1,042. This has occurred alongside an aging of the population and an attendant decline in average household size – meaning that fewer people live in the same number of dwellings.

Table 1: Town of Bentley Population: 5 Year Intervals

Town of Bentley Population: 5 Year Intervals			
Year	Population	Year	Population
1961	608	1991	841
1966	660	1996	930
1971	647	2001	1010

1976	722	2006	1094
1981	825	2011	1132
1986	874	2016	1078 (StatsCan)

Sources: Alberta Municipal Affairs Official Population Lists, StatsCan, PCPS

Historic Changes in Density and Household Size

There is a slight trend towards smaller average household size (number of persons within a single dwelling unit) within Bentley. The 2021 figure of 2.21 can be considered very low. Going back to 1991, the average was 2.58. This suggests an aging population and fewer young families, as well as a reflection of broader societal changes including lower fertility rates and increasing numbers of single person households.

Table 2: Changes in Average Household Size

Changes in Average Household Size				
Year	2021	2016	2011	1991
Population	1042	1078	1073	840
Dwellings	471	463	469	325
Average Household Size	2.21	2.33	2.29	2.58

Source: Statistics Canada Census Data

Demographic Analysis

Bentley's experience is not significantly different from many other small rural communities with an aging population and a lack of physical growth. It is not declining, but not growing either. This has implications for service provision, for municipal taxes, and the future of the community. There is sufficient land for residential growth, but uptake has been very low. There is general agreement, certainly between Town and County Council members, that commercial and industrial development is needed to create jobs and give more people a reason to move to Bentley. At the same time, Bentley has significant opportunities due to significant traffic volumes on Highway 12, and its location within a growing region that includes increasing recreational development just a few minutes to the east.

The annexation area comprises about 80 ha (200) acres of land with commercial and industrial potential. If this land was developed at 8 acres per year, it would represent a 25-year land supply. Over a 35-year period, 5.7 acres per year would be developed.

At the same time, the Town has within its boundaries approximately 80 ha of undeveloped land for residential development, also representing a long-term land supply. This includes a Town-owned and serviced subdivision with lots currently for sale. Four out of 21 lots have been sold, and interest is increasing.

Future growth, especially in this regional context, cannot be effectively forecast on the basis of historical growth. Growth projections are, at best, a guess to form a basis for designating a supply of land for urban land uses.

Instead, the annexation area has been chosen because of its contiguity with the existing built-up area, its access to and visibility from Highway 12, its suitability for development including moderate slopes and ability to be serviced, and a lack of fragmented ownership. The location and size of this area also complement the residential land supply. Development of one will result, over time, in the development of the other.

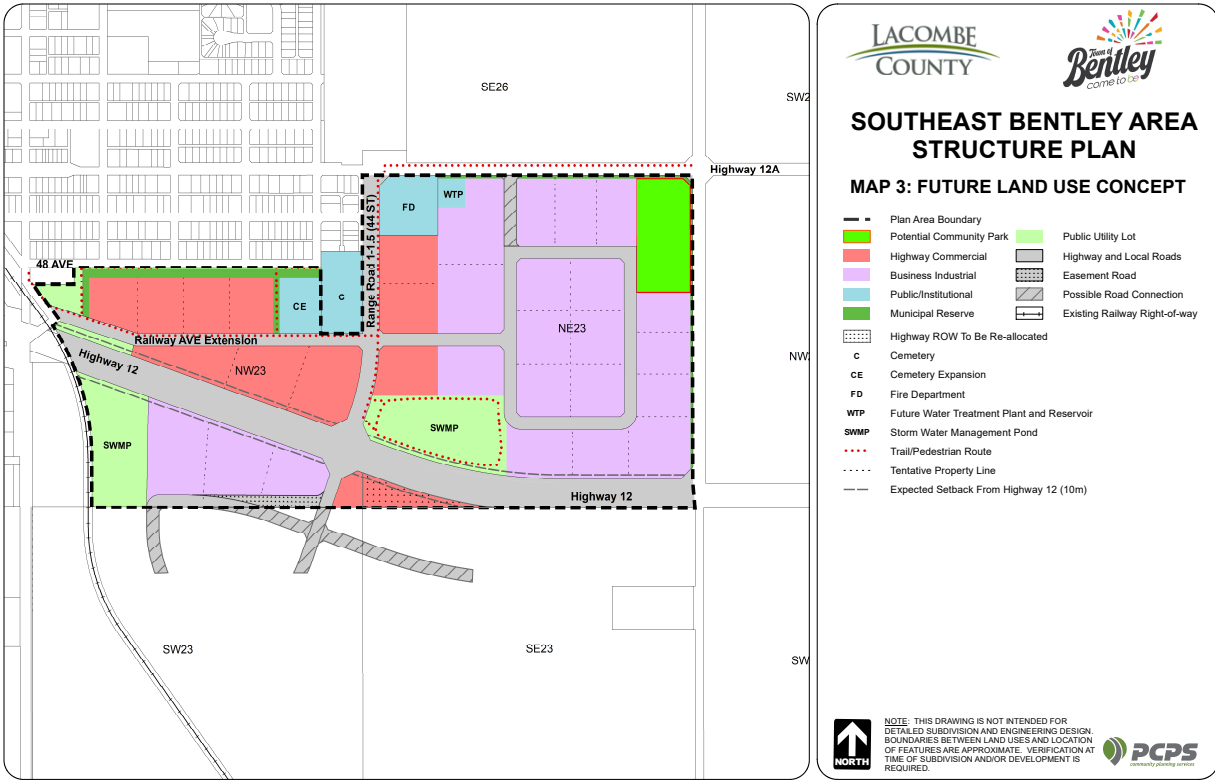
The designation of this area for future urban uses represents the creation of an opportunity to develop lands for commercial and industrial uses in an orderly and cost-effective manner. In the meantime, the policy framework clearly and unambiguously encourages its continued cultivation, meaning that farmland will not be prematurely taken out of active production.

RELATION TO DESIRED GROWTH DIRECTION AND FUTURE LAND USES

Future Land Uses

Figure 3 is the Future Land Use Concept Map from the Southeast Bentley Area Structure Plan. It illustrates the long term intended land uses for the proposed annexation area in relation to the current Town boundaries. If annexation is approved, it is the Town of Bentley's intention to amend its Municipal Development Plan to reflect the general patterns that are shown.

Figure 3: Map 3 from the Southeast Bentley Area Structure Plan



Planned Capacity to Accommodate Growth

The proposed annexation area is expected to provide space for commercial and industrial growth over the next 35 years.

The total Plan Area as shown in the SE Bentley Area Structure Plan is 103.11 hectares. Of this area, 19.08 ha is shown as intended for commercial development, and 42.31 ha is intended for business industrial development, for a total of 61.39 ha, or just over 200 acres.

Over 35 years, this area would accommodate an average of 0.54 ha of commercial development and 1.2 ha of industrial development per year.

The Town has sufficient land designated for residential growth for the short to medium term, on the north side of the community. The lands subject of this annexation proposal are to provide opportunities for commercial and industrial development to provide employment, tax revenue, and to attract new residents to the community.

Direction of Growth

The selection of a growth direction generally to the south and east of the Town’s present boundaries results from several factors. These include:

- The ability to provide contiguous boundaries and logical units of land for the planning and orderly development of future commercial and industrial areas, along with the ability to create a buffer from residential uses within the community;
- A selection of future commercial sites to serve the travelling public and the local and regional population in proximity to Highway 12 where commercial can be successful;
- Providing opportunities for future industrial development and employment lands for the long term in a location that caters to industries needing access to the Provincial highway network.

ABILITY TO EXTEND MUNICIPAL INFRASTRUCTURE AND SERVICES

An assessment of the ability to extend municipal infrastructure into the proposed annexation areas was undertaken by the Town's engineering consultant. The results of their conceptual engineering are described below.

Water

The Town water distribution system can be extended to service the proposed annexation areas.

At this time, it is understood that the Town of Bentley's water system can accommodate new users for the next 20 years at an annual growth rate of 3%.

Wastewater

The Town of Bentley has an existing sewage lagoon system in the southwest corner of the town. It also has capacity to handle 20 years of growth at an annual rate of 3%.

The annexation area lies above the existing developed area of the town. This will minimize capital and operating costs associated with pump or lift stations for sewage collection.

Storm Drainage

All of the proposed annexation lands can be serviced with a municipal storm drainage system that includes a proposed stormwater management facility at 44 Street and Highway 12 and an existing stormwater facility to the southwest. Drainage from the area will continue to be directed under Highway 12 west to the Blindman River.

Transportation

Highway 12 forms a bypass, and was built relatively recently. Recent traffic counts reveal annual average daily traffic (AADT) of over 6,000 vehicles per day, based on 2023 Alberta Transportation data. Highway 12 connects Bentley to Highway 2 (QEII Highway) and the City of Lacombe to the east, and Sylvan Lake and Rimbey to the west.

Highway 12A runs through centre of Bentley, and forms its main street. It also connects the community to Aspen Beach and Gull Lake to the east. This alignment includes a paved trail that is currently maintained by the Town.

44 Street connects Highway 12A and Highway 12. This is the only portion of roadway to be assumed by the Town as a consequence of annexation.

The Southeast Bentley Area Structure Plan anticipates that Railway Avenue will be extended as the commercial area develops.

The Area Structure Plan also show future internal road networks in a conceptual manner, to be constructed as development proceeds.

Finally, the Area Structure Plan includes provision for multi-use walking and cycling trails for recreation and as alternative transportation.

MATTERS AGREED UPON BETWEEN THE TOWN & COUNTY

Over the course of five months between January 2024 and May 2024, the Town and County have met on three occasions to discuss the Town's annexation proposal. The following matters have been agreed upon between the Town and County.

Annexation Lands

The lands to be requested to be annexed to the Town of Bentley are those lands shown on Figure 1 and as described in Appendix A.

Effective Date of Annexation

The date that will be requested as the effective date of the annexation is January 1, 2025.

Compensation for Loss of Municipal Property Tax Revenues

Lacombe County is not seeking any compensation for loss of municipal property tax revenue.

Capital Debentures

There are no capital improvements in the annexation area that are subject to compensation.

Nature of Tax Arrangement for Affected Landowners

The Town of Bentley and Lacombe County have agreed that affected landowners will be offered a thirty-five (35) year arrangement to mitigate the impact of annexation on the municipal portion of their property taxes. This arrangement will see annexed lands continue to be assessed and taxed as if they were still in Lacombe County for up to 35 years following the effective date of annexation. This is based on the expectation that the annexation area could reasonably meet commercial and industrial land needs for 35 years or more.

Further, it was agreed that the arrangement described above will stop once a property owner starts to develop their property at an urban density, or subdivides their lands, or connects to municipal water and/or wastewater services supplied by the Town of Bentley. Appendix C contains a more detailed description of the details of the proposed approach to municipal taxes for the annexed lands.

Initially, the municipalities proposed a 25-year tax arrangement. However, at a meeting at their home on April 18, 2024, the landowners expressed concern that it will take longer than 25 years to build out the annexation area. They are in the business of farming, and will continue to farm or rent to other farmers for the foreseeable future. For them, there is a principle at stake – the land should be taxed at rural rates until it is no longer farmed. It was explained to the owners that the Land and Property Rights Tribunal seeks certain, time-specific conditions, and the 25-year tax agreement had been formulated on this basis. It was emphasized to them that the annexation was not being pursued to gain a benefit from taxation of agricultural land, but to facilitate urban growth. It was also explained that the Town and the County are not opposed to a tax agreement that is not time-specific, and the owners were invited to make their concerns known to the LPRT when the annexation application is made.

The Intermunicipal Committee reviewed the comments from the landowners, and revised their direction to provide a 35-year property tax arrangement.

MATTERS NOT AGREED UPON BETWEEN THE TOWN & COUNTY

There are no matters related to the proposed annexation that have not been agreed upon between the Town of Bentley and Lacombe County. Mediation and dispute resolution efforts were not required.

CONSULTATION PROCESS WITH LANDOWNERS

Communication and consultation with the affected landowners began in with background work for the Southeast Bentley Area Structure Plan (ASP) in 2022. Apart from Town and Town/County owned sites, there is one affected landowner, comprised of four individuals from one family.

The Chief Administrative Officer of the Town of Bentley has been in regular communication with the landowners since the beginning of the ASP creation process. Background documents and the proposed plan were shared with them, and they were notified of the various public meetings held during the plan creation process, and of course formally notified of the statutory public hearing held by Lacombe County Council in November 2023.

They did not attend the public hearing, but submitted a letter for Council's consideration regarding development needs and location of residential versus commercial/industrial land uses in the Plan Area and within the Town. There was no objection in principle to the Area Structure Plan.

A letter was mailed to the affected landowners, including the Notice of Intent to Annex. This letter is contained in Appendix D.

On April 18, 2024, a meeting was held with the landowners at their home to discuss the proposal and the tax agreement with them.

A written response (email) from the landowners is contained in Appendix G.

An open house/public was also held on April 18, 2024, in Bentley. The landowners were made aware of the open house through the letter and through a number of personal communications. The landowners chose not to attend the open house/public meeting.

CONSULTATION PROCESS WITH THE PUBLIC

The Town and County hosted multiple open houses/public meetings during the creation of the Southeast Bentley Area Structure Plan, where annexation was frequently mentioned and understood to be an end goal of the process. In addition, a public meeting/open house was held in Bentley at the Agricultural Society building on April 18, 2024. The public was notified of the April 18 public meeting through advertisements in the Town's monthly Neighbourhood Notes, Lacombe County's news publication, the Lacombe Express, the Rimbey Review, at the Town Offices and on both the Town and County's websites.

The first open house for the creation of the Southeast Bentley Area Structure Plan was held on November 16, 2022, at the Town of Bentley. It was an opportunity for the public to view information boards displayed and to gather information about the proposed ASP. This was followed up with an open house/public meeting on June 29, 2023, to present the draft ASP, and a statutory public hearing held by Lacombe County Council in November 2023. Every engagement with the public included Town and County logos and staff presence, emphasizing that this initiative dealt with land in the County, but both municipalities were directly involved.

The purpose of the open house was to provide information about the Town's proposed annexation and to gain feedback from the public. An online and paper survey were also administered.

The April 18 public meeting included a presentation of the Town's proposed annexation. The public was invited to discuss and ask questions about the annexation process with Town and PCPS staff and Town Council. The public was invited to submit written comments on the annexation proposal, including via an online survey. About 20 members of the public attended. In addition to the Town's Chief Administrative Officer and a representative from Parkland Community Planning Services, the Town of Bentley Mayor and Council members were present. Lacombe County was represented by the CAO and two members of County Council.

VIEWS EXPRESSED BY THE PUBLIC AND TOWN'S RESPONSES

Comments and concerns discussed with the public at the open house/public meeting on April 18, 2024, are summarized below:

- The public asked about taxation of farmland, and was advised that the Town and County have discussed a tax agreement to hold taxes at the rural rate as long as it is being farmed, for a specified period of time
- There was a question about zoning of annexed land; it is expected that the Town would amend its Land Use Bylaw to put these lands into an Urban Reserve district to limit uses to agricultural activities until urban development occurs

- Concerns were expressed about land use compatibility for residents along 48 Avenue; this was addressed by referencing policies in the Southeast Bentley Area Structure Plan, including provisions for a buffer strip from future commercial uses.

Further to the public meeting, a total of 66 responses were received to an online survey using Survey Monkey, including a number of paper submissions. This represents about 6% of the Town's population.

1. Do you support commercial and industrial growth for Bentley through the proposed annexation?

Yes – 74%

No – 8%

Mixed feelings/unsure – 18%

2. Do you have any concerns about the proposed annexation?

Yes – 32%

No – 56%

Mixed feelings/unsure – 12%

3. If you answered yes to Question 2, please describe your concerns.

- *Of course tax increase for our residential while we wait for the benefit of a bigger tax base.*
- *Location. I feel it is going to be a eyesore for a community, as you drive by it'll look industrial and less appealing to stop by our lovely community*
- *Who's paying for this?*
- *With increasing our industry comes with crime and business not following community bylaws. We contract our peace officer program to lacombe county who is stretched thinly covering a large area.*
- *Would be concerned about pulling bussiness away from downtown. Also concerned about noise pollution from the area straight south of Bentley. (If turns into truck stop. M)*
- *Plan the development so that it encourages the continual usage of down town business facilities*
- *Concerned about it not being done properly like the last residential expansion which was an obvious failure*
- *Direct impact of the residents who live on 48 street.*
- *Safety. Air quality. Pollution. Noise. Dust.*
- *Hoping to avoid chain restaurants in the commercial development*
- *What happens to the price of the homes that will be across from that?*
- *The value of my home dropping and my property taxes increasing. The crime commercial/industrial businesses draw in.*
- *Will the business owners be local Or foreign. ?*
- *Bentley is known for its quiet lifestyle. Why ruin a good thing*
- *My only concern is: who will own the property after annexation. As long as the current owner is properly compensated for the use or purchase of their property, then I will vote for the annexation.*
- *Need a guarantee that it won't be a complete failure like the subdivision on the north side of town. Taxpayers can't be on the hook again.*

- *Traffic*
- *Taxes*

4. Is there any other information that you would like to have to better understand this proposal?

Yes – 35%

No – 65%

5. If you answered yes to Question 4, please describe:

- *How are improvements to the annexed land to be paid for?*
- *Would increasing our economy lead to proper law enforcement.*
- *Just have as much information available as possible on a timely matter*
- *Will there be any incentives to attract developers to begin development in the annexed land?*
- *Not willing to pay any additional taxes. Crazy how much we pay already*
- *A proposed timeline*
- *Where exactly is the commercial growth going to be and will it take away from people coming to the downtown core?*
- *More transparency. Better communication with residents directly affected. Ie. Those living on 48 ave*
- *I'd like to know ideally what types of business you're hoping to have in there and what the plan is for encouraging development and businesses to want to be there*
- *Well there be a privacy fence or up asking the exit to separate the industrial from the housing asking that stretch?*
- *What type of business ?*
- *Just as much information as positive*
- *Costs, up front and down the road to the ratepayers of the Town of Bentley. Zoning regs.*
- *An explanation of annexation versus appropriation.*
- *What you plan to build on this property.*
- *More in re business to come*
- *Just more info about this proposal*
- *Who will develop*

Demographic Questions (select all that apply to you):

Are you:

- A Town resident – 49 respondents*
- A County resident – 16 respondents*
- A business owner in Bentley – 10 respondents*
- Someone who works in Bentley – 11 respondents*
- A non-resident – 0 respondents*

Survey Analysis

The survey response, at about 6% of the population, appears to represent a good cross-section of the population.

In response to Question 1, fully 74% support commercial and industrial growth through annexation. Very few said no, but 18% said they were unsure.

In response to Question 2, which asked if they had concerns about the proposed annexation, 56% said no, but 32% said yes and 12% were unsure.

The follow up comments (Question 3) revealed a range of concerns.

Some are based on a lack of knowledge of the planning and annexation processes. Will the business owners be local or foreign? Who will own the property after annexation? The simple answers are we don't know, and the current owners will continue to own the property until they choose to sell.

There were concerns about new commercial affecting the downtown, and impact on the residents on 48 Avenue – both of which were addressed through the Southeast Bentley Area Structure Plan process.

The residents along 48 Avenue will lose their view of an open field to the south. Along with this loss of view comes the prospect of commercial development with its land use impacts. This was considered when the Area Structure Plan was developed. The ASP includes specific policies requiring proponents to design new sites to minimize the impact on nearby residential uses, and includes a strip of Municipal Reserve Land to provide an open space buffer between residential and commercial.

There were also concerns expressed about whether this initiative would be successful, based on the time it has taken for the residential subdivision on the north side of town to see housing construction occur.

In response to Question 4, 35% wanted more information.

Again, the follow up comments to Question 4 showed some concerns that have been addressed through the Southeast Bentley Area Structure Plan process. These included questions such as, "Where exactly is the commercial growth going to be and will it take away from people coming to the downtown core?", and "What do you plan to build on this property?" Another question related to development standards – "Will there be a privacy fence to separate the industrial from the housing . . .?" The ASP answers these questions, and includes provisions for site development standards.

Also, one respondent asked for "an explanation of annexation versus appropriation (sic)." The difference between annexation and expropriation was clearly described during the public meeting on April 18. This question, along with multiple requests for "just as much information as possible" points to the need to continue to communicate.

Others are concerned about how the improvements to the land will be paid for, that taxes will go up, whether incentives will be offered to attract developers, and what types of businesses the Town is hoping to see.

Conclusion

A clear majority of respondents (74%) expressed support for the annexation proposal. A very small number (8%) declared themselves opposed. A good number of respondents did, however, express concerns. From a review of the comments, their reservations are generally not based on opposition to the annexation, but reasonable concerns about taxes, costs to the Town, land use compatibility, development financing, and how to promote new development, along with a desire for as much information as possible.

CONSULTATION PROCESS WITH OTHER LOCAL AUTHORITIES

Referral letters regarding the Town's proposed notice to annex lands from Lacombe County was sent to various agencies and stake holders, such as the local school authorities and Alberta Transportation in March 2024. Information about and an invitation for the April 18 public meeting were included as well as the map identifying the lands being considered for annexation. Appendix E contains the letter and materials sent to other local authorities, along with the distribution list.

A follow-up email was sent on May 7, 2024, requesting a written response from those agencies and stakeholders who had not yet responded.

VIEWS EXPRESSED BY OTHER LOCAL AUTHORITIES AND TOWN'S RESPONSES

This section summarizes the views of other local authorities. Copies of the correspondence received by the Town are contained in Appendix F.

Alberta Environment

No concerns to the proposed annexation.

Alberta Transportation

No objections in principle to the proposed annexation. However, the following comment was made:

- In the "Town of Bentley Annexation Areas" map, Highway 12 right-of-way should not be included in the lands to be annexed.
- The map shown in the Intent to Annex has been amended to remove the Highway 12 right-of-way.

ATCO Gas

ATCO Gas holds the franchise for the distribution of natural gas within the Town of Bentley and will be expected to provide this utility service within the annexation area.

No response has been received to date.

Wolf Creek School Division

No concerns. Development may increase school busing needs in the future.

GLDC Gas Co-op

The Gull Lake and Deer Creek Gas Co-operative, which serves the rural area around Bentley, advised of a blanket easement across the Angus lands that will need to be replaced with a utility right-of-way (URW) to address an existing gas pipeline on the eastern and northern edges of the NE of 23.

This matter can be addressed by the Town and the landowner when the land is subdivided for sale and development.

The Co-op notes that the Town of Bentley's franchise agreement with ATCO Gas requires all gas customers within the Town to be served by ATCO. GLDC anticipates that ATCO will seek to have GLDC enter into an interim gas supply agreement. The Co-op has advised that it will do so, but only for its two existing customers, and only for a definite length of time to be specified in the agreement.

This will need to be in place as of the effective date of annexation.

EQUUS REA

Equus Rural Electrification Association, operating within Lacombe County, has confirmed that it has no concerns about the proposed annexation.

Fortis

Fortis Alberta holds the franchise for the distribution of electricity within the Town of Bentley and will be expected to provide this utility service within the annexation area.

Their response is included in Appendix F.

North Red Deer River Water Services Commission and North Red Deer Regional Wastewater Services Commission

The Water Commission supplies water from the City of Red Deer to portions of Lacombe and Ponoka Counties, and to the Town of Blackfalds, the Town of Ponoka, and the City of Lacombe. The Wastewater Commission transfers wastewater from portions of Lacombe County, the Town of Blackfalds and the City of Lacombe to the City of Red Deer for treatment.

Operations are handled by the City of Lacombe under contract with the Commissions.

These commissions are not directly affected by the annexation proposal. However, these regional water and wastewater services may be an option to be evaluated when the Town of Bentley needs to expand its treatment systems in the future.

Letters have been received stating that the Commissions have no concerns with the proposed annexation.

LANDOWNER RESPONSE

As there is only one private landowner (comprised of four members of one family), no questionnaire was administered.

A representative for the Town met in person with the four owners at their residence on April 18, 2024.

In an email on behalf of the landowners, Jean Angus stated:

“I believe that the Town of Bentley is annexing way more acres than will be used as Commercial and Industrial land in the next 25 years. Therefore, I would like the Town of Bentley to guarantee that any land that is still being farmed will continue to be taxed at the same mill rate as it would have been taxed had it remained in the County of Lacombe.”

FINANCIAL ANALYSIS OF PROPOSED ANNEXATION

The Town and County have reviewed and considered the potential financial impact of annexation on the two municipalities. The tables presented below contain the financial indicators that were considered as part of this assessment.

Table 6 shows the effects of the proposed annexation on Lacombe County.

Table 6: Comparative Financial Indicators: Lacombe County

Item	Lacombe County	Annexation Area	Per cent of Total
Population	10,343	0	0
Dwelling Units	5,055	0	0
Land Area (ha)	291 390	111.35	0.038%
Municipal Roadways (km)	2 193.08	0.83	0.038%
Total Equalized Assessment	\$7,359,656,657	\$55,300	0.00075%

Note: 2024 Data retrieved from Municipal Affairs

Table 7 shows the effects of the proposed annexation on the Town of Bentley.

By all measures the impact on Lacombe County is comparatively small, typically measured as a fraction of a percent. The impact to the Town of Bentley is more significant in percentage terms and by all measures is positive.

The difference in assessment and taxation is negligible for Lacombe County, and very small for the Town of Bentley. The assessed value of the area as farmland is just \$55,300. However, the annexation area represents a 45% increase in land area for Bentley, and its real value to the Town will be found in future commercial and industrial development.

Table 7: Comparative Financial Indicators: Town of Bentley

Item	Town of Bentley	Annexation Area	Per cent of Total
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Population	1,078	0	0
Dwelling Units	427	0	0
Land Area (ha)	247	111.35	45%
Municipal Roadways (km)	15.35	0.83	5.4%
Total Equalized Assessment	\$113,445,040	\$55,300	0.049%

Impact on Select Financial Indicators	Without Annexation	With Annexation
Lacombe County – Equalized Assessment Per Capita	\$711,559	\$711,553
Town of Bentley – Equalized Assessment Per Capita	\$105,236	\$105,287

Note: Data retrieved from Municipal Affairs Profiles

Lacombe County has not requested municipal tax compensation from the Town of Bentley.

The most significant immediate additional annual operating costs absorbed by the Town of Bentley from the annexation area will be maintenance of 44 Street.

It is the opinion of the Town of Bentley that the additional operating expenses resulting from taking over responsibility for 44 Street will not have an adverse effect on the Town’s overall financial capacity.

RELATION TO ANNEXATION PRINCIPLES

The following section addresses the annexation principles that have been established under MGB Order 123/06. Each principle is listed below and is followed by a brief response describing how the proposed annexation meets the principle.

Principle 1: *Annexations that provide for intermunicipal cooperation will be given considerable weight. Cooperative intermunicipal policies in an intermunicipal development plan will be given careful consideration, weight and support so long as they do not conflict with Provincial policies or interests.*

Response: The proposed annexation is a key component of implementing the agreed upon framework in the Town of Bentley / Lacombe County Intermunicipal Development Plan. This proposal also follows the creation of an Area Structure Plan as an intermunicipal initiative that was adopted by Lacombe County Council in November 2023.

Principle 2: *Accommodation of growth by all municipalities (urban or rural) must be accomplished without encumbering the initiating municipality and the responding municipality’s ability to achieve rational growth directions, cost effective utilization of resources, fiscal accountability and the attainment of the purposes of a municipality described in the Act.*

Response: The proposed annexation reflects an intermunicipal understanding that provides for long term growth opportunities for both the Town and the County. The area is contiguous with the Bentley urban area, and readily serviceable. The background work for the Southeast Bentley Area Structure Plan included the two quarter sections to the south, with the view that Lacombe County would oversee the long-term development of that area. Lacombe County chose to remove those quarter sections from the Plan Area due to objections from the landowners; however, the potential for long term industrial development within the County remains. Further, Lacombe County has other areas designated for industrial growth.

Principle 3: *An annexation or annexation conditions should not infringe on the local autonomy given to municipalities in the Act unless provisions of the Act have been breached or the public interest and individual rights have been unnecessarily impacted.*

Response: The proposed annexation and annexation conditions does not infringe on the ability of either the Town or County to manage land use and govern within their boundaries.

Principle 4: *An annexation must be supported by growth projections, availability of land within current boundaries, consideration of reasonable development densities, accommodation of a variety of land uses and reasonable growth options within each municipality (initiating and responding municipality).*

Response: The proposed annexation reflects a need for additional lands to accommodate long term commercial and industrial growth to support the long-term viability of a small urban centre. While it cannot be based on historical growth, this annexation is supported by the municipalities based on increasing economic opportunity in within central Alberta, and Bentley's location on the Highway 12 corridor. It does not preclude future opportunities for the accommodation of commercial and industrial uses by the responding municipality, in accordance with the Intermunicipal Development Plan.

Principle 5: *An annexation must achieve a logical extension of growth patterns, transportation and infrastructure servicing for the affected municipalities.*

Response: The proposed annexation is based on logical growth patterns that reflect the ability to accommodate the needs of various lands uses and an efficient extension of roadways and municipal water and wastewater systems. It is contiguous to existing fully serviced development, and can be readily accessed from the provincial highway corridor.

Principle 6: *Each annexation must illustrate a cost effective, efficient and coordinated approach to the administration of services.*

Response: The proposed annexation involves lands that can be readily serviced with municipal infrastructure in a cost-effective manner. There are no residences or privately-owned buildings within the area.

Principle 7: Annexations that demonstrate sensitivity and respect for key environmental and natural features will be regarded as meeting provincial land use policies.

Response: Background studies for the Southeast Bentley Area Structure Plan included a Biophysical and Wetland Assessment. There is no occurrence of rare or sensitive species within the Plan Area. The area to be annexed is comprised almost entirely of cultivated farmland, plus a stormwater management facility owned by the Town.

Principle 8: Coordination and cost-effective use of resources will be demonstrated when annexations are aligned with and supported by intermunicipal development plans, municipal development plans, economic development plans, transportation and utility servicing plans and other related infrastructure plans.

Response: The proposed annexation is consistent with the Town of Bentley / Lacombe County Intermunicipal Development Plan and the Town of Bentley Municipal Development Plan, and the Southeast Bentley Area Structure Plan adopted by Lacombe County Council.

Principle 9: Annexation proposals must fully consider the financial impact on the initiating and responding municipality.

Response: The financial impact of this proposed annexation has been considered. It does not pose a significant impact on either municipality. The tax revenues from farmland without buildings are modest, and the maintenance costs caused by the assumption of the 44 Street road allowance are expected to be readily absorbed by the Town.

Principle 10: Inter-agency consultation, coordination and cooperation is demonstrated when annexations proposals fully consider the impacts on other institutions providing services to the area.

Response: The proposed annexation involved consultation with other local authorities. No impacts have been identified, apart from the fact that the local gas co-operative will lose two customers to ATCO Gas, which holds the franchise for the Town of Bentley.

Principle 11: Annexation proposals that develop reasonable solutions to impacts on property owners and citizens with certainty and specific time horizons will be given careful consideration and weight.

Response: The proposed annexation includes requested conditions to mitigate the municipal tax impact on affected landowners based on a clear time horizon.

Principle 12: Annexation proposals must be based on effective public consultation both prior to and during any annexation hearing or proceedings.

Response: The proposed annexation involved public consultation throughout the process, beginning with the creation of the Southeast Bentley Area Structure Plan that started in 2022. Future development and

annexation have been discussed at four public meetings, have been the focus of two online and paper questionnaires, and have been the subject of many conversations within the community.

Principle 13: *Revenue sharing may be warranted when the annexation proposal involves existing or future special properties that generate substantive and unique costs to the impacted municipality(s) as part of the annexation or as an alternative to annexation.*

Response: No long-term revenue sharing has been requested by the responding municipality, and none is proposed.

Principle 14: *Annexation proposals must not simply be a tax initiative. Each annexation proposal must have consideration of the full scope of costs and revenues related to the affected municipalities. The financial status of the initiating or the responding municipality(s) cannot be affected to such an extent that one or the other is unable to reasonably achieve the purposes of a municipality as outlined in section 3 of the Act. The financial impact should be reasonable and be able to be mitigated through reasonable conditions of annexation.*

Response: The proposed annexation is motivated by a desire for future commercial and industrial growth to support the financial sustainability of the Town of Bentley. Current property taxes from the land proposed to be annexed are modest (municipal portion of \$444 in 2023 at the County rate), and do not represent an incentive to annex. The financial impact on Lacombe County is negligible, and the Town of Bentley will incur very little in the way of new costs until the land is developed for urban uses.

Principle 15: *Conditions of annexation must be certain, unambiguous, enforceable and be time specific.*

Response: The proposed annexation includes a request for a 35-year property tax agreement with conditions that are certain, unambiguous, enforcement and time specific.

CLOSURE AND REQUESTED OUTCOMES

Based on negotiations with Lacombe County and responses to concerns raised by landowners, the Town wishes to pursue annexation of the lands shown on Figure 1 and listed in Appendix A.

The Town is seeking annexation of these lands because:

- The lands are needed to accommodate the Town's long term commercial and industrial land needs and provide for long term commercial and industrial growth opportunities;
- The subject areas are serviceable with extensions of municipal water, wastewater and storm drainage systems;
- The lands are contiguous with the Town's boundaries and represent a logical extension of the Town's jurisdiction;

- The annexation area reflects the Town of Bentley / Lacombe County Intermunicipal Development Plan, the County-approved Southeast Bentley Area Structure Plan, and agreement reached by the Town and County in the annexation discussions.

The Town requests the following:

1. That the lands described in Appendix A be annexed to the Town of Bentley;
2. That the effective date of Annexation be January 1, 2025;
3. That the conditions pertaining to the assessment and taxation of annexed lands as outlined in Appendix C of this report be attached to the Order-in-Council giving effect to annexation.

CERTIFICATIONS

A copy of the resolution by Town of Bentley Council authorizing the annexation application and certifying the Negotiation Report as accurate and a copy of the resolution by Lacombe County Council accepting the Negotiating Report are attached as Appendix H.