

**Calgary Metropolitan
Region Board**

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Jordon Copping
Chief Officer
IREF #2021-03

Dear Jordon,

This letter represents the official response from the City of Airdrie for IREF Application **2021-03**.

On review of the application information provided and the review conducted by the third-party consultant (**Situated Consulting**) as well as CMRB Administration, the City of Airdrie confirms that we take a position of **objection** to this application and present a **challenge** to the CMRB recommendation for approval.

The rationale for our **objection** to the application and the **challenge** to the CMRB recommendation is included under separate cover as part of this submission.

Sincerely,



Peter Brown

Mayor, City of Airdrie
403.948.8820
mayor@airdrie.ca

carbon copy –

City of Airdrie Council
CMRB Mayors and Reeves
Chris Sheard, CMRB Chair
Paul Schulz, City of Airdrie Chief Administrative Officer

enclosed –

Rationale for IREF Objection and Challenge to CMRB
Administration



Objection to IREF 2021-03 (South Springbank ASP)

Interim Growth Plan Alignment Review –

Airdrie supports regional planning and the opportunities available within the context of this IREF application to improve regional efficiency and environmental protection for the betterment of all within the Calgary Metropolitan Region (CMR). Further, the City of Airdrie supports RVC in the desire to update land use planning, provide a range of housing choices and integrate open space into development.

However, the City of Airdrie does not concur that the proposed South Springbank Area Structure Plan (SS-ASP) aligns with the Interim Growth Plan (IGP), per the alignment review below:

Section 2, Principle 1(a)

The South Springbank ASP does not promote the integration of land use and infrastructure planning.

Per **Map 12: Servicing** of the SS-ASP, all servicing from the western and eastern portions of the plan are brought to the north-central point to cross into the North Springbank ASP in lieu of seeking an intermunicipal solution for greater overall efficiency.

Airdrie appreciates that there is a portion in the NE corner of the plan in Special Study Area 1 that indicates that wastewater will flow to Calgary. However, there is no policy support to indicate that this has been arranged with Calgary – and this provides an opportunity for intermunicipal servicing arrangements that will improve the fiscal efficiency of this development area and the region overall.

Section 2, Principle 1(c)

This ASP accommodates marginally higher average densities, but at an overall average of less than one unit per acre. At this density rate, appropriate pipe servicing is difficult to justify economically and converts much more land than would otherwise be required to accommodate the population coming to this portion of the region. The SS-ASP does not identify areas for substantial concentration of people and employment.

Section 2, Principle 2(a)

The SS-ASP fails to manage risks to water quality by including Policy 19.14, which permits direct wastewater dispersion, regardless of the amount of treatment, as long as it is not directly discharged into the Bow or Elbow Rivers.

Section 2, Principle 3(a)

This ASP does not promote the efficient use of land or allow for cost-effective development. Though laudable, we contend that the preservation of up to 60% of the developable area for open space may fail to create an economy of scale that will allow the piped and efficient servicing suggested for portions of the plan.

Further, Airdrie notes that the plan area size, at 13,200 acres is larger than the area annexed by Airdrie in 2012 (12,640 acres), and which required significant justification for County and provincial approval. This substantial plan area proposes to accommodate only 14,600 people.

Finally, Airdrie notes that the plan identifies that servicing arrangements for individual development areas will only be assumed by the County on confirmation that the servicing operation has reached the “break even” point. Recognizing local autonomy, this creates a risk for uncompleted and unregulated servicing arrangements without defined expiry within the region and for private development interests.

Section 3.2.2

The SS-ASP does not demonstrate that there has been coordination between RVC and adjacent municipalities for required services. There is no demonstration of either coordinated land use/service planning, or appropriate intermunicipal agreements.

Further, there is no demonstration of coordination with school boards serving this development area. The combined population of the North Springbank and the South Springbank ASP (SS-ASP) would necessitate between nine and 11 elementary schools and up to two high schools based on typical student generation demand in the region. There is no provision of school sites in either ASP and no evidence of coordination with any of the school boards to provide required reserve land or cash-in-lieu to accommodate these requirements.

Section 3.2.3(a)

Airdrie notes that the SS-ASP includes a policy allowing for wastewater discharge regardless of the level of treatment, as long as it is not directly discharged into the Bow River or Elbow River. This does not meet the intent of the IGP policy to protect source water quality throughout the region.

Section 3.4.1.2

Airdrie does not concur with the interpretation of the third-party reviewer. We contend that this section of the IGP applies to proposed intensification and infill of existing settlements in hamlets and other unincorporated urban communities in the rural context, such as in the context of North Springbank and South Springbank.

Per this interpretation, the SS-ASP fails to achieve the efficient use of land, higher density in central core areas, higher density residential or mixed-use in core areas, mix of uses including services and facilities, and efficient use of infrastructure required for intensifying or infilling existing settlement areas in hamlets or unincorporated urban communities within rural municipalities.

Airdrie further notes that Section 7.33 of the NS-ASP allows “local plans” (more detailed plans) within the ASP to extend their boundaries where the context requires to achieve better planning. This has the potential implication of creating a “de facto” expansion of the ASP boundaries if “local plans” found at the border of the ASP extend beyond the boundary of this IREF application.

Ultimately, Airdrie submits that there is an opportunity to work with all Calgary Metropolitan Regional Board (CMRB) members to address the portions of this IREF application which we believe do not meet the requirements of the IGP.