

June 25, 2021

File No.: CMRB IREF 2021-03

Jordan Copping
Chief Officer
Calgary Metropolitan Region Board
305, 602-11 Avenue SW
Calgary, AB T2R 1J8

Dear Mr. Copping:

**Re: IREF Application 2021-03 | Rocky View County
South Springbank Area Structure Plan**

**Please note that the following comments apply to IREF 2021-02 and 2021-03; however as per the CMRB IREF challenge process these comments are being submitted separately for each IREF application.*

Thank you for the opportunity to review the above noted IREF applications for the North and South Area Structure Plans (ASP's) in Rocky View County. The Town has reviewed the applications and cannot support these proposals, as they are not in alignment with the principles and objectives of the Interim Growth Plan (IGP). As such, the Town of Okotoks objects to CMRB Administration's recommended approval of IREF 2021-02 and IREF 2021-03.

The IGP was created to enable continued growth in the region prior to the adoption of the Growth Plan and Servicing Plan. The intent of the IGP is to provide guidance to promote appropriate development, efficient use of land, and efficient use of regionally significant infrastructure in a manner that does not compromise the long term sustainability of the region. The principles and objectives articulated in the IGP were supported by member municipalities and provide high level guidance for regionally significant plans that reflect the aspirations and priorities for the future of the Calgary Region.

The North and South Springbank ASP's will have an impact on the use of land and infrastructure in the Calgary region as they collectively encompass over 10,000 hectares of land with a projected population of approximately 25,000 people. The Town commends Rocky View County in its efforts to create overarching plans for the Springbank area; however, these plans do not provide sufficient policy direction to



ensure the implementation and full build out of the plan areas will meet the overarching principles of the IGP. Specifically, the Town is focusing its objection to IREF 2021-02 and 2021-03 based on misalignment with the following IGP principles:

- Principle 1(a) (b) – “Promote the integration of land-use and infrastructure planning” and “Optimize the use of existing infrastructure when accommodating growth”

These plans will guide the long-term development of more than 10,000 hectares of land accommodating the equivalent of a small city in terms of population. Though the plans provide a high level framework for intended future land uses there is no clear direction on an appropriate sequencing of development based on availability of existing infrastructure, the logical and cost effective extension of existing infrastructure, and substantial build out of existing areas. Instead, the plans enable opportunities for local plans to be accepted throughout the plan areas, with no apparent sequence, if proponents can demonstrate that it can be serviced, whether it be piped, communal or privately serviced. It should be noted that for an urban municipality to pursue annexation, of a much smaller land area, they are expected to undertake detailed analysis of growth needs in terms of population projections, absorption rates, and infrastructure analysis to justify land needs.

Given the lack of clear direction on the sequence of development as it relates to the optimization and/or logical extension of existing infrastructure, and substantial build out of existing areas, the Town is of the opinion that the plans as presented do not meet the intent of Principles 1(a) and (b)

- Principle 3(a) – “Promote the efficient use of land and cost effective development”

In their recommended approval of these plans, CMRB administration noted that “efficient use of land” was considered in the context of the plan area and not the broader region. Based on that assumption, CMRB administration determined that the plans did promote the efficient use of land as higher development densities were proposed than in the existing plans for the area. The Town of Okotoks disagrees with CMRB Administration’s assessment and is of the opinion that efficient use of land should be considered in the context of the broader region. The IGP was developed to guide sustainable growth patterns throughout the region and the principles of the plan should be measured in the context of the region as a whole, and not within individual plans.

Though these plans enable a slight increase in density there is no firm policy direction to ensure these higher densities are realized as the plans build out. Instead, the plans provide opportunities for areas identified for higher density development to be developed in a lower density traditional country residential form. The full built out of this plan could result in a land base larger than most

urban municipalities within the region that is occupied by low density country residential development that would not facilitate the economies of scale necessary for piped servicing. Furthermore, the plans propose to convert approximately 50 – ¼ sections of agricultural land to business and residential uses without a clear phasing strategy that requires substantial building out of existing areas and optimization of existing infrastructure before allowing new areas to develop.

- Principle 1(c) and 3(e)– “Encourage higher densities, greater intensity of use, the provision of community nodes, and the leveraging of transit service, where applicable” and “Ensure the provision or coordination of community services and facilities”

The intent of these principles is to ensure that plans for regionally significant population growth facilitate the creation of complete communities and provision or coordination of community services and facilities. At full build out these plans will accommodate up to 25,000 people; however, the plans do not include a comprehensive framework to provide access to community services and facilities such as recreation, libraries and schools, either through cost sharing agreements with adjacent municipalities, or County facilitated provision of these services. Instead, these matters are largely deferred to local plans that may not be subject to regional review. It is the Town’s position that these matters should be addressed at the ASP stage to ensure there is sufficient guidance to ensure community services and facilities are provided to support population growth in these areas.

Though these plans do enable opportunities for modest density increases through country residential infill, cluster residential and villa condo developments, these development forms are not required in the plan and traditional country residential development can be considered throughout the plan area. These plans do not provide sufficient direction to ensure higher densities are achieved over the build out of the plans, nor do they provide a comprehensive framework to ensure community services such as recreation, schools and libraries are provided for.

It is noted that some adjacent municipalities have expressed concerns over a lack of collaboration to coordinate planning for land-use, infrastructure, and service provision in preparing these plans. On this note, the Town would like to highlight the positive collaborative relationship we have with our neighbour, Foothills County, on a number of mutually beneficial servicing matters. The Master Shared Servicing Agreement between Okotoks and Foothill County facilitates a fair and equitable sharing of costs related to the delivery of certain hard and soft services that benefit both municipalities and is model of intermunicipal collaboration in the province. The Foothills/Okotoks Regional Water Project is another example of two municipalities working together to facilitate a more cost effectively delivery of potable water to its residents than if this

initiative was pursued individually. Additionally, the Town of Okotoks and Foothills County jointly own a regional recreation centre and have recently initiated an intermunicipal transportation analysis to assess the impact of a number of medial closures on Highway 2.

For the reasons stated above, The Town of Okotoks objects to CMRB Administration's recommended approval of IREF 2021-02 and 2021-03.

Sincerely,

A handwritten signature in blue ink, appearing to read "M. Rockley", with a horizontal line underneath.

Matt Rockley
Deputy Mayor

cc: Greg Clark, Board Chair
CMRB Mayors and Reeves
Okotoks Town Council
Elaine Vincent, CAO
Jeff Greene, Community Growth, Investment and Sustainability Director