

June 29, 2021

File No.: CMRB IREF 2021-04

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

Dear Mr. Copping:

**Re: IREF Application 2021-04 | Rocky View County
Municipal Development Plan**

Thank you for the opportunity to review the above noted IREF application for a new Municipal Development Plan (MDP) in Rocky View County. The Town has reviewed the application and cannot support this plan as it does not align 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 2021-04.

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.

Rocky View County's MDP is intended to guide the next 20 years of growth in the County, projected to include approximately 5,800 new dwellings and 18,000 persons. The plan has identified priority areas encompassing a land base similar in size to the City of Calgary to accommodate this projected growth. Though the plan identifies priority residential and employment growth areas, it does not provide sufficient guidance to ensure that projected growth is accommodated in a manner that fulfils the principles of IGP. The Town notes that the proposed MDP does not align with the recently approved Growth Plan; however, this objection is focused on misalignment with the following IGP principles:



Specifically, the Town is focusing its objection to IREF 2021-04 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” and Principle 3(a) – “Promote the efficient use of land and cost-effective development”

The priority growth areas identified in the plan are substantive in relation to the anticipated population growth over the plan horizon. The lands identified as priority growth areas rival the land base of the City of Calgary; however the anticipated population growth over the next 20 years is less than 20,000 people. It should be noted that the level of analysis that an urban municipality must go through to justify annexation and planning for new growth areas is significant relative to what has been put forth in this MDP and recent ASP IREF referrals from the County. Before an urban municipality can even prepare an MDP and ASP's for new growth areas, it must first justify the land needed to support future growth through detailed analysis, including but not limited to: population projections, land absorption, servicing analysis and fiscal considerations. The policies and identification of growth areas in the MDP, and deferral of important planning considerations to ASP's and subsequently to local plans, does not demonstrate that this same level of analysis was undertaken to identify priority growth areas.

In particular, the MDP lacks policy that provides clear direction on an appropriate sequence of development within priority growth areas that reflects servicing considerations and substantial build out of existing areas. This clearly demonstrates a lack of integration between land-use and infrastructure planning and does not create the conditions to facilitate orderly development of land that optimizes use of existing infrastructure. Furthermore, the lack of development sequencing in consideration of infrastructure planning could enable an overall dispersed pattern of growth that would not meet the objective of achieving efficient use of land and cost effective development.

Through substantive use of, “should,” “may,” and “where feasible” in policy statements, the MDP also facilitates numerous provisions for new development to be considered outside of priority growth areas without plan amendment and for new growth to occur without the benefit of an area structure plan. For example, policy 2.3.1(b) of the MDP enables Council to allow new residential development outside of priority growth areas without any direction on the scale of development or how these proposals would be evaluated. The use of a “should” statement in policy 2.3.1(e) enables opportunities for residential development to be accommodated without the benefit of an area structure plan. Furthermore, the use of “should” statements in many of the employment areas policies in section 2.4.1 enable abundant opportunities for employment development to locate

outside of priority growth areas and to be accommodated without the benefit of an area structure plan.

For the reasons outlined above, the Town is of the opinion that full implementation of the MDP will not facilitate growth in a manner that achieves Principles 1(a),(b) and 3(c).

- 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”

The MDP does not provide sufficient guidance to facilitate an overall higher density of development or intensity of use, nor does the plan provide a sufficient policy framework to create the conditions for future transit to be considered. Though the residential policy section of the plan does encourage a higher density of development, there is no guidance within the plan relating to expected densities for various forms of development. Furthermore, the lack of clear direction on expected infrastructure servicing levels enables abundant opportunity for dispersed low density development to continue. The stated objective to encourage higher densities is not matched with clear policies to ensure this objective is realized.

The lack of growth management policies in the plan will enable a dispersed and ad-hoc development pattern that will not facilitate the conditions for transit service to be a viable and cost effective option in the future. Transit is mentioned as something that “should” be considered in area structure plans; however there is no overarching policy in the MDP that establishes high level direction for transit planning to inform ASP’s. Furthermore, provisions in the MDP enable population and employment growth without the benefit of an ASP, raising the question of when transit would be considered. Though the transportation policies of the MDP include a statement directing local and regional transit connections be considered in lower order plans, the lack of growth management policies and firm requirement for ASP’s, and the absence of overarching direction for how transit should be consider in these plans does not create the conditions to leverage opportunities for transit service in the future.

For the reasons outlined above, the Town is of the opinion that full implementation of the MDP will not facilitate growth in a manner that achieves Principles 1(c)

- Principle 3(e) “Ensure the provision or coordination of community services and facilities”

The MDP lacks sufficient policy direction to ensure that future growth is supported by the provision or coordination of community services and facilities. Policies in the MDP relating to the provision of community services and facilities

(soft infrastructure) direct the need for these services to be assessed at the ASP stage. As mentioned previously in this letter, the MDP includes provisions for population and employment growth to be accommodated without the benefit of an ASP. Also, it should be noted that in the recent IREF referrals for the North and South Springbank ASP's that the requirement to address the provision of community services and facilities was further deferred to the non-statutory local plan stage.

The MDP does not include a commitment from Rocky View County pursue opportunities for the provision or coordination of community services and facilities (soft infrastructure) and instead defers this requirement to developers, where deemed appropriate by the County. The MDP lacks guidance for when it would be appropriate to require developers to construct or pay for soft infrastructure. This MDP is anticipated to accommodate an increase of approximately 18,000 people over the next 20 years without a clear commitment and overarching policy framework to ensure that community services and facilities are provided.

The lack of a comprehensive framework to facilitate the provision of community services and facilities to support population growth, and deferral of this consideration to ASP's and further to local plans, does not provide the Town with confidence that the full implementation of the MDP will meet principle 3(e) of the IGP.

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 developing the MDP. 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 a 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-effective 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.

The Town appreciates the desire to provide flexibility in the MDP to consider unique proposals that may provide a benefit to the County and broader region; however this must be balanced with appropriate direction to ensure that full implementation of the MDP will achieve the principles and objectives of the IGP. The approach of providing for maximum flexibility to accommodate market demand, lack of growth management policies, and continued deferral of consideration of hard and soft infrastructure provision

to lower order plans does not provide certainty that the full implementation of the MDP will achieve the principles and objectives of the IGP.

For the reasons stated in this letter, The Town of Okotoks objects to CMRB Administration's recommended approval of IREF 2021-04.

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