

Interim Regional Evaluation Framework (IREF) CMRB Administration Recommendation	
Member Municipality	Rocky View County
Application Name	Elbow View Area Structure Plan
IREF Application Number	2021-16
Type of Application	Area Structure Plan
Municipality Bylaw #	Bylaw C-8111-2020
Date of Complete Application	August 6, 2021
Date Application Circulated	August 12, 2021
Date of CMRB Administration Recommendation	September 9, 2021
CMRB Recommendation	
That the Board REFUSE IREF Application 2021-16, the Rocky View County Elbow View Area Structure Plan.	
<ul style="list-style-type: none"> • IREF Application 2021-16 is for the proposed Elbow View Area Structure Plan (Elbow View ASP) with a plan area including approximately 890 ha (2200 acres) of land. The Elbow View ASP provides a framework for the development of a new community with approximately 10,000 to 18,000 people at dwelling units per net acre ranging from 3.5 to 7.5. • The Elbow View ASP was previously submitted as IREF application 2021-10. CMRB Administration recommended refusal of application 2021-10 and the application was withdrawn by the applicant, Rocky View County. • Rocky View County Council approved several changes to the ASP. A redline version of the updated ASP was included with the IREF 2021-16 application to inform Board members of the changes made to the plan. • The changes to the Elbow View ASP generally focus on requiring future local plans to be appended into the ASP making them statutory in effect, requiring a multi-phase water servicing strategy with the first local plan, and adding clarifying details around the transportation aspects of the ASP (see below for further details). • The third-party consultant review, completed by Lovatt Planning Consultants, found the application to be not consistent with the Interim Growth Plan (IGP) and the IREF. • CMRB Administration finds IREF Application 2021-16 to be not consistent with the principles and policies of the IGP and Section 6.0 of the IREF and recommends refusal of the application. 	
Attachment	
<ul style="list-style-type: none"> • Third Party Consultant Review, Lovatt Planning Consultants 	

1.0 Background

Rocky View County has submitted an Interim Regional Evaluation Framework (IREF) application for a new Area Structure Plan, the proposed Elbow View Area Structure Plan (Elbow View ASP), Rocky View County Bylaw C-8111-2020.

The Elbow View ASP was submitted to the CMRB through IREF under Section 4.1(b) which requires municipalities to refer “all new Area Redevelopment Plans (“ARPs”) and Area Structure Plans (“ASPs”) proposing employment areas and/or 50 or more new dwelling units” to the Board. The Elbow View ASP provides a framework for the development of approximately 10,000 to 18,000 residents on 890 ha (2200 acres) of land with net dwelling units per acre ranging from 3.5 to 7.5 upa.

CMRB Administration notified CMRB members of IREF Application 2021-16 on August 12, 2021.

The Elbow View ASP was previously submitted as IREF Application 2021-10, which received a recommendation of refusal from CMRB Administration and was subsequently withdrawn by Rocky View County. The full recommendation provided by CMRB Administration and the third party report for IREF Application 2021-10 can be found at www.calgarymetroregion.ca/2021-10.

1.1 Changes to the Elbow View ASP

As noted above, the Elbow View ASP is a new statutory plan for a greenfield, New Freestanding Settlement Area. The Elbow View ASP provides a framework for the development of approximately 10,000 to 18,000 residents on 890 ha (2200 acres) of land with dwelling units per net acre ranging from 3.5 to 7.5 upa.

Rocky View County has changed some aspects of the proposed Elbow View ASP since it was submitted as IREF Application 2021-10. As described in the cover letter for IREF Application 2021-16 (see pages 1-2), these changes are as follows:

- *A new policy has been added requiring that Local Plans must be appended to the ASP; such ASP amendments would necessitate referral to the CMRB for review and consideration with respect to the IGP and IREF. This would allow further consideration of the Plans alignment with the IGP with respect to servicing, population and density at each planning stage*
- *A new policy has been added such that as part of the initial Local Plan application, a multi-phase water servicing strategy shall be required and developed through a collaboration between the applicant, the County, and other relevant stakeholders. This amendment is intended to provide additional certainty around the timing and comprehensive nature of the water servicing strategy for the area. By appending Local Plans, as discussed above, and inclusion of this policy further clarifying that a water servicing strategy will be required at first Local Plan with a full, multi-phase plan to be implemented through each Local Plan stage. Additional wording has been proposed within both the text of the water servicing section and Policies 21.2 and 21.3 to improve*

clarity and to strengthen connection between policy and supporting technical studies.

- *Additional text was added to Section 20 to further clarify requirements for further transportation planning to be in accordance with the supporting Transportation Servicing Study.*
- *Details around transportation requirements, timing, and implementation are detailed in the supporting study; however, the CMRB Administration review did not find sufficient connection between policy of the ASP and the supporting technical studies. Again, additional wording has been proposed within both the text of the transportation section and Policies 20.2 and 20.11 to improve clarity and to strengthen connection between policy and supporting technical studies.*

2.0 Third-Party Evaluation

CMRB Administration retained Lovatt Planning Consultants to evaluate the application with respect to the IREF requirements. The Lovatt Planning Consultants evaluation (attached) reviewed the proposed Elbow View ASP in relation to the objectives of the Interim Growth Plan (“IGP”) and the evaluation criteria of the IREF. Lovatt Planning Consultants found IREF Application 2021-16 to be **not consistent** with the objectives of the IGP and IREF.

3.0 CMRB Administration Comments

3.1 Consistency with the IGP and IREF

As outlined in third-party review, and in consideration of its own review of IREF 2021-16 application materials, CMRB Administration finds IREF Application 2021-16 to be **not consistent** with the objectives of the IGP and IREF and provides the following rationale. As IREF Application 2021-16 is generally the same ASP document as was submitted under 2021-10, many of the comments provided by CMRB Administration continue to apply. The full recommendation provided by CMRB Administration and the third party report for IREF Application 2021-10 can be found at www.calgarymetroregion.ca/2021-10.

3.1.1 Location, Scale and Type

A stated purpose of the IGP, see Section 1.4, is to identify matters of regional significance related to proposed development by addressing the following:

- Location – What is the relationship and impact on the function of existing and planned regionally significant corridors and adjacent municipalities?*
- Scale – What is the scale of the proposed development and the potential impact on regional infrastructure?*
- Type – What type of development is proposed and what should the statutory plan address?*

The development proposed within the Elbow View ASP is significant in scale, with a plan area of 890 ha (2200 acres) of land. At the writing of this report, the Elbow View ASP plan area is the largest greenfield ASP ever submitted to the CMRB IREF process for

approval in either a rural or urban area. The proposed development is planned for a greenfield area with no existing services or infrastructure within the plan area itself to service or support the future population, which ranges from 10,000 to 18,000 people. Although the ASP plan area is adjacent to an area of existing country residential development, it is not contiguous with built areas where there is a high level of existing service provision for utility servicing, recreation, community services or other services.

3.1.2 Efficient and Cost-Effective Use of Existing Infrastructure

As highlighted in the IGP, given the location, scale, and type of the proposed Elbow View ASP, the planned development has a high degree of regional significance and a high potential for impact of regional corridors and infrastructure, including potential impacts on transportation corridors, waterways, and community infrastructure. Given this, it is important to ensure the plan provides the Board with sufficient detail about what is being proposed for future development to ensure the proposal is consistent with the policies of the Board.

As noted in the IGP, Section 3.4.3.1, New Freestanding Settlement Areas shall, “d. make efficient and cost-effective use of existing and planned infrastructure through agreements with service providers, and connect to municipally-owned or franchised water and wastewater services; e. provide access to existing or planned community services and facilities; or make efficient and cost-effective use of existing and planned community services and facilities through applicable municipal agreements with service providers at the appropriate time.”

CMRB Administration finds the level of detail presented in the plan and policies of the Elbow View ASP, including a wide range of densities and population, a very general proposed land use plan, and options for future servicing, insufficient to determine if the proposed Elbow View ASP is consistent with Section 3.4.3.1 d) and e) of the IGP.

3.1.3. Mitigating Impacts on Regionally Significant Infrastructure

Through policy 3.2.3 d), the IGP requires that all statutory plans shall “provide mitigation measures and policies to address identified adverse impacts on existing or planned regional infrastructure, regionally significant corridors, and community services and facilities.” Many planning details, such as those around water servicing, wastewater servicing, and the integration of land use and infrastructure, are deferred to future local plans.

Although technical studies for the Elbow View ASP, which were not submitted to the IREF and have not been reviewed in detail by CMRB Administration, provide an overview of the **feasibility** of several servicing options, CMRB Administration cannot weigh the appropriateness of those options without a clear understanding of which option is being proposed. As an example, Section 22 Wastewater Servicing of the ASP notes that there are three options for wastewater servicing:

- *Option 1: on-site collection with on-site treatment, returning to the Elbow River;*
- *Option 2: on-site collection with off-site routing for treatment via the HAWSCo facility, and treated effluent returning to the Elbow River in the County; and*

- *Option 3: on-site collection with off-site routing for treatment via the Bonneybrook facility, returning to the Bow River in The City of Calgary.*

All of these options for wastewater servicing may be feasible, but CMRB Administration cannot determine if the proposed Elbow View ASP policies appropriately mitigate any regional impacts from the wastewater servicing strategy given no one servicing approach is presented in detail and integrated with the land use strategy.

In a similar way, water servicing is not clearly defined for review by the Board. As noted in the covering letter provided by Rocky View County, “a new policy has been added such that as part of the initial Local Plan application, a multi-phase water servicing strategy shall be required and developed through a collaboration between the applicant, the County, and other relevant stakeholders.” The regional impact of building a new water servicing system, a proposed strategy presented in Section 21 Water Servicing of the ASP, could be significant and should be given due consideration.

CMRB Administration does not accept that the first future local plan is an appropriate planning stage to determine plan-wide strategies for a proposed community of this size and scale, especially given the role of the IREF process to review statutory plans in their entirety and provide recommendations to the Board on the proposed development as a whole. Although ASPs are high-level frameworks and must accommodate flexibility, they must also be a clear guide to what’s being proposed and provide the Board with an opportunity to review the application in sufficient detail to be confident that regional concerns and considerations are effectively addressed.

3.1.4 Appending future Local Plans into the ASP

Changes made to the Elbow View ASP since its submission as IREF Application 2021-10 include a provision to require future local plans to be appended into the Elbow View ASP. This would allow the Board an opportunity to review further details around land use and servicing as they would be submitted through IREF or REF as ASP amendments. As noted in the IREF Alignment Statement provided by RVC, “policy will be implemented through the creation of statutory local plans, which will provide the next layer of integrated land-use and infrastructure planning, establishing specific boundaries and locations for land uses and infrastructure components set out at a high level in the ASP. All statutory local plans will be informed by additional technical studies, which are mandated by the ASP policies” (see page 2).

CMRB Administration appreciates the willingness of Rocky View County to refer local plans for the area to the CMRB Board in the future. This would allow the Board the opportunity to ensure consistency with the IGP or the Growth Plan at future stages of planning. However, as noted above, the proposed Elbow View ASP does not itself contain sufficient detail to determine if the overall development is consistent with the IGP. As previously stated, although ASPs are high-level frameworks and must accommodate flexibility, they must also be a clear guide to what’s being proposed and provide the Board with an opportunity to review the application in sufficient detail to be confident that regional concerns and considerations are effectively addressed.

4.0 Recommendation

That the Board **REFUSE** IREF Application 2021-16, the Rocky View County Elbow View Area Structure Plan.

IF the Board chooses to approve IREF 2021-16, CMRB Administration recommends that it be approved with the following advisement:

- 1. As stated in policy 3.1.12.1 of the Board-approved Growth Plan, "Area Structure Plans and Area Redevelopment Plans and amendments to Area Structure Plans and Area Redevelopment Plans submitted to the CMRB after approval of the Growth Plan by the Board and before the Growth Plan is approved by the Minister shall be brought into alignment with the Growth Plan within one year of approval of the Growth Plan by the Board."*
- 2. As stated in Policy 3.1.12.2 of the Board-approved Growth Plan, "If a member municipality determines that a Regionally Significant amendment is required to bring an Existing Area Structure Plan or an Existing Area Redevelopment Plan into alignment with the Growth Plan, the amendment shall be referred to the Board for approval through Regional Evaluation Framework."*

The IREF approval for 2021-16 does not remove or supersede the requirement for the Rocky View County Elbow View Area Structure Plan to comply with policies 3.1.12.1 and 3.1.12.2 of the Growth Plan by May 21, 2022.



**Lovatt
Planning Consultants Inc.**

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August 20, 2021

**Jordon Copping, Chief Officer
Calgary Metropolitan Region Board
305, 602 11 Ave SW
Calgary, Alberta T2R 1J8**

Dear Mr. Copping:

Reference: **IREF 2021-16 - Statutory Plan Evaluation of the Rocky View County
Elbow View Area Structure Plan**

The proposed Elbow View Area Structure Plan is not consistent with the objectives of the Calgary Metropolitan Region Interim Growth Plan being schedule A to Ministerial Order MSL 091/18.

Attached is our Third Party Consultant Evaluation report for the captioned statutory plan referral from Rocky View County.

Sincerely,
LOVATT PLANNING CONSULTANTS Inc.

O. Lovatt, RPP, MCIP
Principal

Attachment: IREF 2021-16

Interim Regional Evaluation Framework (IREF) Third Part Review

Member Municipality	Rocky View County
Application Name	Elbow View Area Structure Plan as amended
IREF Number	2021-16
Type of Application	New Amended Area Structure Plan
Municipality Bylaw #	C-8111-2020 as amended
Date of Application	August 6, 2021
Date of Third-Party Review Report	August 17, 2021

Findings

That the Rocky View County Elbow View Area Structure Plan is **not consistent** with the Interim Growth Plan MSL: 091/18.

Efficient Use of Land:

*Land is a limited non-renewable resource, and so it should not be wasted.
Land-use decisions should strive to reduce the human footprint on
Alberta's landscape.*

Alberta Land Use Framework

Summary of Review

- Rocky View County has resubmitted an application to approve the amended Elbow View Area Structure Plan (ASP) to the Calgary Metropolitan Region Board (CMRB) for an Interim Regional Evaluation Framework ("IREF") review.
- The proposed ASP promotes creation of a 900 hectare (2,200 acre) hamlet bounded on the north by the Elbow River and the south by the Tsuut'ina Nation. The Plan area is bisected from east to west by Highway 8.
- The ASP proposes a density range to a maximum of 7.5 units per net acre (18.5 units per net hectare) for the residential area with a total population at build-out of 18,000 persons. Some 64 percent (1,400 acres) of the Plan area is proposed to be primarily single family residential developments with duplex/semi attached, and medium density housing types (@7.5 units per net acre an eight unit apartment building would occupy more than an acre of land while a four duplex unit would also occupy an acre).
- A centrally located linear commercial corridor extending north/south with two village centres located at either end of the corridor includes Core, Commercial and Village Centre type uses that are defined by the ASP (Figure 01).
- An initial application was withdrawn after negative IREF evaluations. The significant plan short falls cited were:

- The lack of integration between land use and density provisions of the proposed ASP with the water, sanitary sewer and transportation servicing requirements to be developed in the future. With consideration for the large Plan area, servicing capacity, land use and residential density must be inter-related in space and time to optimize *a limited non-renewable resource*.
- The ASP defers critical municipal servicing matters to a non-statutory level of planning.
- The land use and population density proposed by the ASP is not an efficient use of land.
- In response to the negative evaluation the proposed ASP was amended as follows:
 - *A new policy has been added such that as part of the initial Local Plan application, a multi-phase water servicing strategy shall be required and developed through a collaboration between the applicant, the County, and other relevant stakeholders.*
 - *Additional text was added to Section 20 to further clarify requirements for further transportation planning to be in accordance with the supporting Transportation Servicing Study.*
 - *A new policy has been added requiring that Local Plans must be appended to the ASP (making local plans statutory).*
- The amended ASP clarifies the transportation and water servicing intentions of local plans and provides surety that local plans will be statutory; however the amended plan does not address the necessary integration of land use with municipal services. The amended ASP does not address the fundamental principle of encouraging the efficient use of land. As well, a hamlet should be appropriately scaled as required by the Interim Growth Plan.
- The Elbow View Area Structure Plan is not an efficient use of land and is not scaled appropriately. It is therefore is **not consistent** with the CMRB Interim Growth Plan.

Review Prepared by

Lovatt Planning Consultants Inc.

3.2 Region-wide Policies

3.2.1

Principles, Objectives, and Policies

Principle 1: Promote the Integration and Efficient Use of Regional Infrastructure:

- The location and capacity of water and waste water systems and their integration with regional systems will not be confirmed until after residential densities and land uses for the entire 900 hectare ASP is adopted.
- As such, the efficiency of the ASP in terms of providing municipal services also cannot be confirmed.

Principle 2: Protect Water Quality and Promote Water Conservation

- The proposed ASP requires that a Water Shortage Response Plan be prepared at a later time.
- Also the ASP requires that a Master Drainage Plan for the entire Plan area be submitted by an applicant at the time of an initial local plan.

	<p>Principle 3: Encourage Efficient Growth and Strong and Sustainable Communities</p> <ul style="list-style-type: none"> • The low average residential density is contrary to ensuring that settlement areas are planned and designed to encourage higher densities as encouraged by numerous policies in the Interim Growth Plan. • Community design elements include a diversity of housing types, identification of development typologies, and promotion of low impact developments. However, there is a disconnect between the development typologies proposed and the maximum density allowed. Multi-storey residential and mixed use developments are typically associated with net residential densities of 14.0 units per acre and greater. • Hamlet development should be appropriately scaled.
<p>3.2.2 Demonstrate collaboration to coordinate with other member municipalities</p>	<ul style="list-style-type: none"> • The City of Calgary commented on the ASP. The City does not support the ASP due to the potential significant transportation, servicing and stormwater impacts to the City. The amended ASP adds an Objective to <i>Work with Alberta Transportation for timing of required upgrades</i>, but does not include the City in those discussions. • The amended ASP does not address the city of Calgary's contention that the type of development being contemplated is not in keeping with the Rocky View County Plan and belongs in neighbouring urban municipalities.
<p>3.2.3 Water, wetlands and storm water</p>	<ul style="list-style-type: none"> • The amended ASP provides that a water servicing strategy be prepared as part of the initial local plan. • The amended ASP did not address the status of wetlands or stormwater planning.
<p>3.3 Flood Prone Areas</p>	
<p>3.3.1 Development in the floodways</p>	<ul style="list-style-type: none"> • Not applicable.
<p>3.3.2 Flood protection in flood fringe areas</p>	<ul style="list-style-type: none"> • Not applicable.

3.4 Development Types	
3.4.1 Intensification and Infill Development	
3.4.1.1 Intensification and Infill in existing settlement areas in cities, towns, and villages	<ul style="list-style-type: none"> • Not applicable.
3.4.1.2 Intensification and Infill of existing settlement areas in hamlets and other unincorporated urban communities within rural municipalities shall be planned and developed:	<ul style="list-style-type: none"> • Not applicable.
3.4.2 Expansion of Settlement Areas	
3.4.2.1 Expansion of settlement areas in a contiguous pattern	<ul style="list-style-type: none"> • Not applicable.
3.4.2.2 Expansion of settlement areas with 500 or greater new dwelling units	<ul style="list-style-type: none"> • Not applicable.

<p>3.4.2.3 Rationale for expansion of settlement areas that do not meet all components of Policy 3.4.2.1 and 3.4.2.2</p>	<ul style="list-style-type: none"> • Not applicable.
<p>3.4.3 New Freestanding Settlement Areas</p>	
<p>3.4.3.1 New freestanding settlement areas</p>	<ul style="list-style-type: none"> • Not applicable.
<p>3.4.3.2 New freestanding settlement areas with 500 or greater new dwelling units</p>	<ul style="list-style-type: none"> • Not applicable.
<p>3.4.3.3 Rationale for new freestanding settlement areas with 500 or greater new dwelling units that do not meet all components of Policy 3.4.3.2</p>	<ul style="list-style-type: none"> • Not applicable.
<p>3.4.4 Country Residential Development</p>	
<p>3.4.4 Country Residential Development</p>	<ul style="list-style-type: none"> • Not applicable.
<p>3.4.5 Employment Areas</p>	
<p>3.4.5.1 Employment areas</p>	<ul style="list-style-type: none"> • Not applicable.

<p>3.4.5.2 Connections to transit stations and corridors</p>	<ul style="list-style-type: none"> • Not applicable.
<p>3.5 Regional Corridors</p>	
<p>3.5.1.1 Mobility Corridors</p>	<ul style="list-style-type: none"> • Not applicable.
<p>3.5.2.1 Transmission Corridors</p>	<ul style="list-style-type: none"> • Not applicable.