

TOWN OF COCHRANE

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June 25, 2021

Jordan Copping, Chief Officer

Calgary Metropolitan Region Board
Suite 305, 602 11 Avenue SW
Calgary, AB T2R 1J8

Dear Mr. Copping,

This letter represents the official response from the Town of Cochrane for IREF Application 2021-03 – Rocky View County South Area Structure Plan.

The Town of Cochrane (Cochrane) has reviewed IREF 2021-03 – Rocky View County South Area Structure Plan (SSASP). Upon review of IREF 2021-03 – Rocky View County South Area Structure Plan (SSASP), the Town of Cochrane is of the opinion the proposed ASP is not in alignment with intent of the Calgary Metropolitan Region Board (CMRB), its mandate, or the principles and policies of the CMRB Interim Growth Plan (IGP). As such, the Town of Cochrane is submitting a challenge to the CMRB Administration's recommendation for approval.

The CMRB was established based on the understanding that impacts of growth extend well beyond municipal boundaries. Additionally, a strategic collaborative approach to managing growth at a regional scale offers significant benefits to individual municipalities and the region as a whole. This underlying foundational principle of the CMRB is reflected in its mandate to:

- promote the long-term sustainability of the Calgary Metro Region
- ensure environmentally responsible land-use planning and growth management
- coordinate regional infrastructure investment and service delivery
- promote the economic well-being and competitiveness of the region, and
- strive towards consensus regarding matters before the Board

The formation of the CMRB and the establishment of its mandate in 2018 represented a marked shift away from individual planning and growth management in isolation of regional neighbours. Alternatively, it pressed member municipalities to consider planning and development from a regional context, to ensure regional interests are considered and achieved in addition to those of individual municipalities.

The South Springbank Area Structure Plan (ASP) proposes a framework for the development of approximately 5,336 ha (13,187 ac) and a population of approximately 14,600 people. Independently, a proposal of this size, scale and type of development is regionally significant. However, it is necessary to acknowledge the other proposed ASPs within the region when considering this application.

The proposed North Springbank Area Structure Plan (NSASP) is located directly north of the SSASP and covers approximately 5,261 ha (13, ac) and planned population of 20,000 people. The proposed Elbow View Area Structure Plan (EVASP) is located directly south of the SSASP and covers an approximate 890 ha (2,200 ac) and a planned population between 10,000 to 18,000 people. Together, the three proposed area structure plans cover a total unbroken continuous area of approximately 11,487 ha (28,385 ac) and an estimated total population of 52,600 people.

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The size and scale of the three proposed area structure plans forms a significant regional footprint given the proposed planned population and the amount of land it includes. At 52,600 people, the proposed cumulative population is larger than all but two of the other member municipalities and will nearly triple the population of the applicant municipality. For context, Cochrane's land area is approximately 3,179 ha (7,855 ac) and has a current population of about 32,000 people and an estimated population of 58,000 people at full build out of planned areas.

The NSASP is not consistent with the Interim Growth Plan as follows:

- Principle 1 - Objectives (a) (b) (c)

The SSASP provides a high-level framework for future land use as well as some objectives related to regional needs. However, the determination of servicing and infrastructure requirements have been deferred to the local planning stage, with no direction for planned sequencing or logical extension of existing infrastructure. Also, there seems to be a lack of collaboration on the coordination of regional infrastructure and services. Further, with a plan area of 5,336 ha (13,187 ac) and an average density of approximately 1 unit/ac, the Plan does not encourage higher densities or a greater intensity of use. Given this and the potential for 'piecemeal' development throughout the Plan area, Cochrane is of the opinion the SSASP does not meet this principle or objectives.

- Principle 3 – Objective (a)

Cochrane disagrees with CMRB Administration and the Third-Party Reviewer's interpretation of efficient use of land and the position to consider this objective relative to existing development in the Plan area. This interpretation fails to consider efficient use of land in the broader regional context, which is necessary given the proposal is regionally significant. The intent of the IGP is to provide guidance on future growth within the region through a regional lens. As such, the principles and objectives of the plan should be evaluated in the context of the region and not relative to specific locations within individual plans.

Although the Plan accommodates a slight increase in density of a traditionally low-density country residential development type, the proposed SSASP will accommodate approximately 14,600 people within 13,187 acres of land at a density of 1.11 unit/ac. This results in an urban level population in an area larger than most urban municipalities within the region (i.e. this area is 1.7 times larger than Cochrane) at a density significantly lower than all urban municipalities in the region, including hamlets, with no certainty the development would occur at a scale to justify piped servicing. Also, there is no policy direction on items such as growth management, prioritization of growth, logical servicing extensions, or contiguous sequential development. Given this context, it is difficult to conclude the NSASP meets the principle of promoting efficient use of land and cost-effective development.

- General – Lack of ASP Level Detail and Guidance

The ASP lacks sufficient policy guidance and details and defers many important requirements of the IGP to the local planning stage. This includes growth management, sequencing of development, determination of servicing, densities, detailed land use, provision of community service and recreational amenities, planning around existing transmission corridors, and identification of environmentally significant lands. It is important these items and details are included in the ASP, as it is the statutory planning stage that confirms compliance with the IGP principles and objectives.

Thank you for the opportunity to review IREF2021-03 – South Springbank Area Structure Plan. In recognition of the need to consider all growth and development from a regional context and ensure the best outcome for the Calgary Metro

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Region, the Town of Cochrane objects to the Third-Party Review and CMRB Administration's recommendation to approve the IREF.

Cochrane appreciates the desire of CMRB municipalities to proactively plan for growth in their respective jurisdictions. To bring the proposed SSASP into alignment with the IGP it is the opinion of the Town of Cochrane the above noted items would need to be addressed in the guiding ASP and not deferred to future non-statutory local level plans. Further, additional analysis and information is needed to support the size and scale of this ASP and the other proposed ASPs that together form a significant contiguous development footprint within the Region.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeff Genung', is written over a light blue horizontal line.

Mayor Jeff Genung
Town of Cochrane

cc Cochrane Town Council
 Greg Clark, CMRB Chair
 Mike Derricott, CAO Town of Cochrane