

TOWN OF COCHRANE

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June 30, 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 2021-04 – Rocky View County Municipal Development Plan.

The Town of Cochrane (Cochrane) has reviewed IREF 2021-04 – Rocky View County Municipal Development Plan (MDP). Upon review of IREF 2021-04 – Rocky View County Municipal Development Plan, the Town of Cochrane is of the opinion the proposed MDP 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 MDP is not consistent with the Interim Growth Plan as follows:

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

The MDP provides a high-level framework for growth as well as some objectives related to regional needs. However, the determination of servicing and infrastructure requirements have been deferred to the ASP planning stage, with no direction or policy guidance for planned sequencing, encouraging higher densities, greater intensity of use, protection of regionally significant corridors. prioritization of growth areas or logical extension of existing infrastructure. Given this and the potential for 'piecemeal' development throughout the County, Cochrane is of the opinion the MDP does not meet this principle or objectives.

- Principle 2 – Objective (c) & Policy 3.2.3

Although the environment is a listed guiding principle of the MDP and the protection of agricultural operations, environmentally sensitive areas and wildlife corridors is listed as an objective in Section 3.5, there is limited policy guidance to support this. There is no inclusion of policy or identification of regionally significant ecological areas or regional collaboration to protect these areas, consideration of impacts on environmental resources within neighbouring municipalities nor any guidance for identification or mitigation planning at the ASP level, aside from one policy on establishing strategies to address source water concerns with other municipalities.

Potentially significant ecological features are included on the Growth Concept Map in Appendix B. However, there is no supporting language on what these features are or their level of significance at a regional or local scale. In addition, there is no policy requirement for these areas to be studied further at the ASP level or beyond. Without the guiding MDP completing some analysis on these features, the future protection of regional scale ecological areas seems unlikely.

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- Principle 3 – Objective (a) (b) (c) (d) (e)

The first Guiding Principle of the MDP is responsible growth that occurs in a fiscally sustainable manner. However, Cochrane disagrees with the Third-Party Reviewer’s interpretation that this Guiding Principle alone constitutes adherence to Principle 3 of the IREF. Principle 3 encourages efficient growth and strong sustainable communities.

The draft MDP does not include logical extension of servicing policy, includes growth areas spread vastly throughout the County, avoids strong policy limiting where growth will occur and does not include prioritization of development area policy. Without these items being addressed by this guiding document it is very possible that settlement areas will not develop in a contiguous pattern throughout the County.

While fiscal sustainability is always an important item for each municipality, it is unclear in the MDP how the goals of financial sustainability will be achieved. Proposed flexible policies are not supporting the objective in the Financial Sustainability section that states: “The financial sustainability of the County is maintained through careful management of growth and development.”

The introduction of the Employment Area Development section speaks to the inclusion of policies that reflect a logical expansion of existing industrial and commercial areas. However, there is no inclusion of priority areas of development or expansion, nor policies relating to logical extension of servicing, servicing plans or consideration of joint planning with adjacent municipalities on roads, shared servicing, etc. There does, however, exist substantial flexibility for commercial or industrial uses to locate outside of the identified Employment Areas without consideration of servicing.

While the Transportation section discusses the need to partner and cooperate with the Province and adjacent municipalities on regional transportation corridors, there is no mention in the Financial Sustainability section of cost sharing of infrastructure, facilities, recreation, etc. at a regional or intermunicipal level.

Further, the addition of new hamlet growth areas rather than prioritizing growth within existing hamlets and requiring additional servicing capacity to do so is not illustrating financial sustainability. When proposed growth is spread out, not prioritized, lacking servicing plans and growth areas are being expanded when many areas have not yet been developed, it is difficult to agree that the draft MDP is achieving the efficient and cost-effective use of land and services that the IREF is targeting.

- 3.2.2 Regional Collaboration

Section 3.2.2 of the IREF identifies the need to “Demonstrate collaboration to coordinate with other member municipalities.” This is to include items such as coordinating planning for land use, infrastructure and service provision, where applicable. Cochrane does not feel that this has been addressed or that adequate policy guidance on this is achieved in the draft MDP, despite partnerships being a guiding principle of the Draft MDP.

Items of concern were still being noted by adjacent municipalities, as well as the Stoney Nakoda First Nations at the time the MDP was first presented to RVC Council. Many of the items noted were IREF related items – consideration and mitigation of impacts on regionally significant infrastructure and services, lacking alignment

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between the draft MDP and existing Intermunicipal Development Plans, creation of new growth areas, requesting additional collaboration and lacking growth management policies within the MDP.

Aside from the Transportation section, policy is lacking as it relates to regional or intermunicipal collaboration. Items such as regional sharing of servicing, transit systems, public services, recreation, environmental protection, interface issues or cost sharing agreements are not addressed within the MDP.

Despite Intermunicipal Development Plans being a higher order plan than the MDP within the planning hierarchy, Section 4.1.2 states that “In preparing area structure plans and/or local plans, the County should consider Intermunicipal Development Plans, Accords and any other statutory plans, which provide direction with respect to intermunicipal gateways, transition and interface; the County should address issues and opportunities through collaboration with the adjacent municipality.”

Given the hierarchy of planning documents and in the spirit of intermunicipal collaboration and regional planning, policies such as this must be “shall” statements.

- General – Lack of MDP Level Guidance

While the MDP identifies both planned and future planning areas, including new growth and hamlet growth areas, there is no guidance within the MDP on future proposed densities, growth management or prioritization of the development or servicing strategies to ensure there is efficient staging of development and contiguous development.

The MDP identifies that areas that have existing ASPs have not been fully developed and are able to accommodate additional growth over the next 20 years. Yet it has also identified additional new growth areas and included policy that allows for new development to occur outside of the identified priority growth areas. We are concerned about the lack of growth management policies to guide these priority growth areas and would prefer to see justification for the additional growth areas included in the MDP.

The MDP also includes many “should” rather than “shall” statement policies that relate to IREF items. Some examples of this include policies that development should conform to adopted statutory plans, statutory planning documents should be completed for employment areas, large scale commercial and industrial developments should locate within an employment area, expansion of employment area boundaries should require an amendment to the statutory plan and even small hamlets that do not have supporting ASPs or conceptual schemes approved should be guided by the MDP.

Additionally, many of the items required within the IREF are deferred to the ASP stage, but are items that “should” be addressed within the ASP. This includes items such as collaboration with adjacent municipalities, inclusion of a land use concept, population estimates, impact on existing services, infrastructure and amenities, provision of parks, open spaces and pathway connections, impacts on the environment and mitigation and regional transit connections. While it may make sense to defer some of these more detailed items to the ASP stage, the MDP must have clear policy guidance ensuring these items are addressed within the ASP.

Understanding the hierarchy of planning documents, the regionally significant location of the residential and employment growth areas and in the spirit of intermunicipal collaboration policies such as those above must be “shall” statements addressed at the MDP stage in order to guide future development of ASPs.

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- General – Timing of MDP Consideration

Cochrane did raise the concern of the timing of the MDP during the formal circulation period some months ago and we remain of the same opinion. While municipalities must remain able to continue planning for their futures, we do feel as though the completion of this MDP is premature given where the Growth Plan is at and the assurance that development will proceed in alignment with regional growth priorities.

We do understand that this current process is the IREF review and not a review of the MDP against the policies of the submitted Growth Plan. We are also aware that the MDP will be required to conform with the Growth Plan within three years of adoption. However, we did want to include this item as we had raised it in the previous comments on the MDP and our concerns regarding the timing and content of this MDP from a regional perspective remain.

Additional growth areas have been added while the need for them has not been demonstrated. Lacking efficient growth management policies calls into question the likelihood of efficient contiguous growth in the region. We believe policies on regional collaboration and environmental protection are not adequate and the draft MDP does not create strong guidance for future planning. We do not feel as though the MDP as drafted aligns with the IREF and adoption of the MDP as drafted will exacerbate the issue when attempting to bring the MDP in alignment with the Growth Plan in the future.

Thank you for the opportunity to review IREF2021-04 – Rocky View County Municipal Development 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 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 MDP 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 MDP and not deferred to future Area Structure Plans. Further, additional analysis and information is needed to support the size and scale of growth this MDP is supporting within the Region.

Sincerely,



Mayor Jeff Genung
Town of Cochrane

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