



Friday, June 25, 2021

IREF Application #: 2021-03

Attention: Liisa Tipman

Calgary Metropolitan Region Board
Suite 305, 602 11th Avenue SW
Calgary, Alberta, T2R 1J8
ltipman@calgarymetroregion.ca

SUBJECT: City of Calgary Challenge to CMRB Recommendation of Approval for Interim Regional Evaluation Framework Application 2021-02 Rocky View County: South Springbank Area Structure Plan

Dear Ms. *Liisa* Tipman,

The City of Calgary (Calgary) has reviewed the Rocky View County (County) South Springbank Area Structure Plan (the Plan), as well as the Calgary Metropolitan Region Board's (CMRB) Administration Recommendation and Third Party Review. The City of Calgary appreciates The County's efforts at early engagement starting in 2018, and the progress shown to contemplate a range of housing types. However, the Plan proposes a significant amount of population growth without addressing the associated adverse impacts to infrastructure and services. The proposed Plan is inconsistent with the Interim Growth Plan (IGP), and as such, Calgary is challenging the Plan and provides the following rationale:

Source Water Protection and Proper Service Provision

The proposed Plan does not provide adequate mitigation measures and policies to address potential adverse impacts to regionally significant transmission infrastructure (IGP Policy 3.5.2.1 c.), such as Calgary's Water Treatment Plants. The proposed Plan does not require outlining the cumulative impacts (including a baseline assessment), ensuring a proper level of servicing (including how piped services will be provided for the plan area prior to local plan approval) and phasing. Without these and other key measures noted in our circulation responses, along with a strengthened alignment with higher order Provincial and Regional plans, the proposed Plan will create risks to major drinking water sources for the region (IGP objective 2.a.).

Transportation Impacts

The full build out of the Plan will lead to a significant need for new or expanded major infrastructure. The Third Party Review did not consider the Network Analysis for the proposed Plan. The City's review of the Network Analysis found considerable adverse impacts to *regionally significant mobility corridors* and insufficient mitigation measures to address the impacts (IGP Policy 3.5.1.1 c.). This does not protect the function of regionally significant mobility corridors (IGP objective 1.d.).

Transit Provisions

The proposed South Springbank Area Structure Plan defers planning for transit to local plans. Without holistic transit planning at the Area Structure Plan level, it is unclear how a viable network can be created and how transit can be accommodated within the Plan area, where appropriate. Transit connections to employment areas (IGP 3.4.5.2), community nodes (IGP objective 1.c., 3.d.) or other high activity areas should be addressed in the Plan in order to promote the integration of land-use and infrastructure planning (IGP objective 1.a.).

Impacts to Community Services and Facilities

The proposed Plan does not mitigate adverse impacts of the proposed growth on community services and facilities as per IGP Policy 3.2.3 d. Again, responsibilities are deferred to local plans; an approach that does not identify the impacts of incremental growth. This does not “ensure the provision or coordination of community services and facilities” as per IGP Objective 3: e. The City and County do not have a cost-sharing agreement in place to address community services and facilities.

Planning without guiding policy

By deferring the resolution of key issues, such as servicing, cost sharing and impacts to regionally significant mobility corridors to Local Plans, the majority of critical planning efforts are excluded from review by the CMRB. This goes against the purpose of regional planning.

The approach to *defer* is not *provision*. It does not provide sufficient policy guidance and controls to promote the integration of land-use and infrastructure planning (IGP objective 1.a.). Also, without stronger policy guidance, the provision of community nodes is less likely to be successful (IGP objective 1.c & 3.d.).

Calgary recognizes that there are some aspects of the proposed type of development that compliment diversity in the region. However, Calgary remains concerned that the scale, type and location of development, upon full build out of the Plans, will create significant adverse impacts to regional infrastructure, regionally significant corridors and community services and facilities in Calgary and the region. Both Springbank Area Structure Plans combined anticipate a total forecasted population of over 32,000 within a development type that is auto-dependent, not properly serviced, and located within the watershed that provides drinking water sources to the region. While the Plan advances higher density than what has occurred in the area, from a regional perspective, it is questionable whether this amount of population growth within this type of development is an efficient use of land overall (IGP principle 3.a).

Collaboration to Coordinate

The intermunicipal collaboration policies limit mitigation based on “adjacency” rather than “impact”. Excluding non-adjacent applications of concern circumvents the IGP’s minimum requirements for ASPs to collaborate within 1.6 km of a neighbouring municipality (IGP policy 3.2.2.) and further excludes the primary planning efforts from regional review and guidance. This goes against the purpose of the IGP and regional planning.

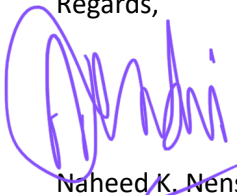
Calgary appreciates the County’s earlier engagement efforts. However, Calgary received the County’s potential administrative amendments close to the County’s February 22 public hearing date. In our view, the late changes did not leave sufficient time for intermunicipal discussions - a circulation requirement of the Rocky View County – City of Calgary Intermunicipal Development Plan (IDP) policy 15.1.5. Instead, the County gave the item second reading. Calgary again requested mediation to resolve outstanding issues, but instead the County chose to advance the application to the Board. We don’t believe these actions *demonstrate collaboration to coordinate* as per IGP policy 3.2.2. The amendments made were

not comprehensive enough to resolve concerns Calgary raised in our comment letters dated January 8 2021 and June 8 2020, and our municipalities have yet to conduct mediation.

In closing, the Interim Regional Evaluation Framework states that “the Board must consider whether approval and full implementation of the statutory plan would result in development that is consistent with the Principles, Objectives, and Policies of the IGP.” Calgary has identified areas where the Plan is not aligned to the IGP and that the rationale for approving the proposed Plan does not reflect the intent of the IGP and the IREF process.

It would be helpful to see adverse impacts addressed at the Area Structure Plan level, policy controls to protect drinking water sources and regional infrastructure, proper servicing in place, mitigation measures, intermunicipal agreements in place, and a more systematic approach to growth management. While Calgary is not able to support the South Springbank Area Structure Plan, we are willing to discuss the amendments, further review the associated technical documents, and work towards solutions that address our earlier identified issues. We hope that the County will step forward to partner on solutions.

Regards,



Naheed K. Nenshi
Mayor
The City of Calgary

Cc: Intergovernmental Affairs Committee, The City of Calgary

Councillor Carra
Councillor Chahal
Councillor Demong
Councillor Farkas
Councillor Gondek
Councillor Wooley

CMRB Representatives, The City of Calgary

Councillor Carra
Councillor Chahal

City of Calgary Administration

Chris Arthurs, Acting Deputy City Manager, Deputy City Manager’s Office
Kelly Cote, Manager, Intergovernmental & Corporate Strategy
Neil Younger, Senior Strategist, Intergovernmental & Corporate Strategy