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Attention: Jordon Copping
Calgary Metropolitan Region Board
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EMAILED ONLY

RE: Town of High River comments on IREF Applications 2021-02 & 2021.03 (Rocky View County)

Dear Mr. Copping

Thank you for providing the Town of High River with the opportunity to comment on IREF Application **2021-02 & 2021.03** (Rocky View County North and South Springbank ASPs).

Our comments are divided into two sections as follows:

- a. North Springbank Area Structure Plan ((NSASP))
- b. South Springbank Area Structure Plan (SSASP)

a. North Springbank Area Structure Plan

It is the Town of High River's understanding that Rocky View County is proposing a new Area Structure Plan for North Springbank.

- o The North Springbank Area Structure Plan (NSASP) area boundary is generally defined by the Bow River to the north, Highway 1 to the south, the City of Calgary to the east, and Range Road 40 to the west.
- o The proposed NSASP supersedes portions of the Central Springbank Area Structure Plan, adopted in 2001, and all of the North Springbank Area Structure Plan, adopted in 1999.
- o The NSASP provides a framework for the development of approximately 5,261 ha (13,000 ac) with a planned population of 19,969 people.
- o The proposed NSASP includes a range of residential, business, and mixed-use forms including infill and cluster country residential, live-work and villa condo, business commercial and industrial, and institutional and community service uses.
- o Business commercial and industrial uses are generally located along the Range Road 33 and Highway 1 corridors within the NSASP plan area.

While the Town of High River would **not** like to challenge the submission, the Town would like to raise some concerns to Rocky View County regarding the proposed NSASP which may include:

1. The proposed NSASP does not provide an answer to Objectives 1.a. of the Interim Growth Plan (IGP), which states: "*Promote the integration of land-use and infrastructure planning*". The large plan area is without sufficient provisions linking land-use and infrastructure, and inadequate growth management policies to minimize impacts on the environment.

Objective 1. c. of the IGP states: *“Encourage higher densities, greater intensity of use, the provision of community nodes, and the leveraging of transit service, where applicable”*.

The proposed NSASP does not provide clear guidance for future transit and defer planning for transit to local plans. Without inclusive transit planning at the ASP level, all future attempts to address such concern would be costly and may not provide the most efficient and sustainable option. The proposed ASP should at least provide high level information regarding how this objective could be addressed and the details could be finalized at the implementation stage.

2. Section 3.2.3.d Region-wide Policies of the IGP states: *“provide mitigation measures and policies to address identified adverse impacts on existing or planned regional infrastructure, regionally significant corridors, and community services and facilities”*.

Large scale developments within any proposed ASP that may have impacts on the existing or the planned regional or sub-infrastructure, must be supported by a comprehensive analysis regarding any negative impacts. In addition, should any adverse impacts be recognized, mitigation measures for rectifying these impacts should be incorporated early in the process. Currently, the proposed NSASP does not provide this type of analysis and information.

3. Section 10 - Future Expansion Area of the proposed NBASP states *“In the future, the lands straddling the Highway 1 corridor are considered to be appropriate principally for commercial uses and a natural expansion of the Regional Business Area defined around Springbank Airport within the Municipal Development Plan”*.

The proposed NBASP indicates that to ensure the area within the ASP grows in a sustainable manner, with an orderly transition from agricultural land use to business and residential land uses, it has identified lands where expansion of the Plan area may occur. At the same time, it is not clear as to why the proposed NSASP could not initiate and/or complete any technical studies for supporting the inclusion of such lands within the Plan area.

Including large portions of lands in the NSASP for potential future development without completing any technical studies, may leave door wide open for conflicts among adjacent municipalities, which may compromise the anticipated regional collaboration efforts.

Based on best planning practices, an ASP should not be processed and/or approved prior to completing critical technical studies to ensure suitability of the land and to minimize future conflicts among regional member municipalities.

4. Section 3.2.2 of the IGP states *“Municipalities should collaborate to coordinate planning for land-use, infrastructure, and service provision with other member municipalities, where appropriate”*.

Although policy 15.1.a Reserves, of the proposed NSASP indicates reserves and environmental reserves would be dedicated to the County as public land during the subdivision process. This statement contradicts section 3.2.2 of the IGP, as the NSASP fails to illustrate collaboration with various stakeholders including school boards.

This section, in its current content and format, clearly indicates that there has not been any sort of coordination with the school boards regarding their interests and potential future needs.

Taking into consideration the proposed planned population for this plan area (19,969 people), the proposed NSASP should have consulted the school boards and must have included adequate school sites at the ASP level.

Based on best planning practices, school sites must be identified in the early planning stage, while details and final sizes of identified potential school sites could be finalized at the subdivision stage.

In addition, lack of consultation with key stakeholders including the school boards, does not support the above highlighted section of the IGP.

b. South Springbank Area Structure Plan (SSASP)

It is the Town of High River's understanding that Rocky View County is proposing a new Area Structure Plan for South Springbank.

- The proposed South Springbank Area Structure Plan (SSASP) is generally defined by the Elbow River to the south, the City of Calgary to the east, and Range Road 34 to the west. The north boundary of the SSASP abuts the south boundary of the North Springbank Area Structure Plan. The SSASP does not include Highway 1 corridor.
- The proposed SSASP supersedes, in part, the Central Springbank Area Structure Plan, which was adopted in 2001.
- The proposed SSASP provides a framework for the development of approximately 5,336 hectares (13,187 acres) of land with a planned population of 14,600 people.
- The proposed SSASP intends to maintain the existing residential character of the South Springbank area with a focus on country residential infill and cluster development, with community and institutional uses focused along Range Road 33.
- There are also four special areas within the SSASP and one urban interface area.

While the Town of High River would **not** like to challenge the submission, the Town would like to raise some concerns to Rocky View County regarding the proposed SSASP which may include:

1. Section 9. Special Planning Areas, of the proposed SSASP, indicates that, there are four Special Planning Areas identified within the Plan area.

Policy 9.4 b) of the proposed SSASP states: *“collaborative engagement with The City of Calgary shall begin at an early stage to allow sufficient time to coordinate any joint planning initiatives and to address any cross-boundary issues and opportunities”*.

Taking into consideration, the proximate location of these special planning areas to the city of Calgary, contiguity to major transportation corridors, and with the potentiality for accommodating higher density of development, require greater collaboration with the City of Calgary.

In its current form, the SSASP has clearly indicated that *“detailed land use planning is not possible at this time, until further collaboration with the City of Calgary is undertaken to coordinate land use planning endeavours and to determine the appropriate transition from an urban to country residential development form”*.

Although the proposed SSASP highlighted the importance of completing such collaboration with the City of Calgary, the SSASP fails to illustrate and/or provide reasons that led to not undertaking such approach at the ASP level.

Including these four special planning areas in the SSASP without completing detailed planning and/or collaboration with the City of Calgary at this stage and leave it for the future circumstances may not be the best approach for supporting regional collaboration.

2. Section 3.2.2 of the IGP states *“Municipalities should collaborate to coordinate planning for land-use, infrastructure, and service provision with other member municipalities, where appropriate”*.

Although policy 15.1.a Reserves, of the proposed NSASP indicates reserves and environmental reserves would be dedicated to the County as public land during the subdivision process. This

statement contradicts section 3.2.2 of the IGP, as the NSASP fails to illustrate collaboration with various stakeholders including school boards.

This section, in its current content and format, clearly indicates that there has not been any sort of coordination with the school boards regarding their interests and potential future needs.

Taking into consideration the proposed planned population for this plan area (19,969 people), the proposed NSASP should have consulted the school boards and must have included adequate school sites at the ASP level.

Based on best planning practices, school sites must be identified in the early planning stage, while details and final sizes of identified potential school sites could be finalized at the subdivision stage.

Lack of consultation with key stakeholders including the school boards, does not support the above highlighted section of the IGP.

Please do not hesitate to contact the undersigned should you have any questions or concerns.

Regards,



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