



Interim Regional Evaluation Framework (IREF) CMRB Administration Recommendation

Member Municipality	Rocky View County
Application Name	Elbow View Area Structure Plan
IREF Application Number	2021-10
Type of Application	Area Structure Plan
Municipality Bylaw #	Bylaw C-8111-2020
Date of Complete Application	May 28, 2021
Date Application Circulated	June 3, 2021
Date of CMRB Administration Recommendation	July 9, 2021
CMRB Recommendation That the Board REFUSE IREF Application 2021-10, the Rocky View County Elbow View Area Structure Plan.	
<ul style="list-style-type: none"> IREF Application 2021-10 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 net dwelling units per acre ranging from 3.5 to 7.5 upa. The proposed Elbow View ASP contemplates the following (see page 26 of the Elbow View ASP): <ul style="list-style-type: none"> The majority of the plan area is identified as residential, providing for primarily single detached housing with some small-scale community supportive retail, low and medium density forms of housing, recreation and community amenities Core areas are planned provide social and commercial nodes, promoting active and pedestrian-oriented experiences connected to, mixed use development and low-to-medium density housing. A commercial area are planned to act as the entranceways to Elbow View, supporting local and regional commercial and employment opportunities. Parks and open space are planned to form ecological, recreational, and functional connections throughout the new community. As stated in the Elbow View ASP, "This ASP is a multi-decade development vision, as such density and population ranges presented herein ensure the necessary flexibility for the Plan to adapt over time" (see page 26 of the Elbow View ASP). 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 2021-10 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 at net dwelling units per acre ranging from 3.5 to 7.5 upa.

CMRB Administration notified CMRB members of IREF Application 2021-10 on June 3, 2021.

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 2021-10 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 2021-10 application materials, CMRB Administration finds IREF Application 2021-10 to be not consistent with the objectives of the IGP and IREF and provides the following rationale.

3.1.1 Deferral of land use and servicing details to non-statutory local plans

The policies of the Elbow View ASP defer details of planning and servicing for the ASP to local plans. As stated in the Elbow View ASP, "for brevity, this document uses the term local plan to refer to a conceptual scheme or master site development plan" (see page 5 of the Elbow View ASP). It is also noted in definitions provided in the Elbow View ASP that conceptual schemes and master site development plans are non-statutory plans (see page 5 of the Elbow View ASP).

As further detailed in the sections below, important details about how the Elbow View ASP will develop and how the impacts of development will be mitigated are not included within the Elbow View ASP. The process of determining these details was deferred to local plans to be determined in the future. As local plans are non-statutory plans, the Board will not have the opportunity to review details around planning and servicing concepts in the future to determine if they are in alignment with the goals, objectives and policies of the IGP.



3.1.2 Lack of Details around Consistency with Encouraging Efficient Growth and Strong Sustainable Communities and Freestanding Settlement Areas

1. Objectives of IGP Principle 3: Encourage Efficient Growth and Strong and Sustainable Communities and Section 3.4. New Freestanding Settlement Areas Policies promote mix of uses, mobility choices, the provision and coordination of community services and facilities, efficient use of land, a mix of uses, community nodes, and efficient and cost-effective use of infrastructure.
 - Although ASPs are higher-level frameworks, Map 07: Land Use Strategy of the Elbow View ASP does not provide sufficient detail to determine how land use and infrastructure are integrated. As noted in the plans, land use components of the residential land uses, core, and commercial areas are to be determined at the local plan stage. Details about the location and provision of land use, infrastructure, density, community services and facilities, and mobility choices are deferred to non-statutory local plans through the policies of the Elbow View ASP.
 - The population range for the proposed development varies significantly, noted as being between 10,000 and 18,000 people. As stated in the Elbow View ASP, "This ASP is a multi-decade development vision, as such density and population ranges presented herein ensure the necessary flexibility for the Plan to adapt over time" (see page 26 of the Elbow View ASP). The flexibility inherent in the plan, with no general allocation of dwelling unit and employment numbers, wide ranges in density (net density range from 3.50 - 7.50 upa), and no density ranges provided for certain development areas, makes it difficult to understand the form of development being proposed and its potential impacts relative to the requirements of the IGP noted above.
 - Transportation and land use concepts are shown together on Map 11: Transportation; however, Section 20 of the Elbow View ASP notes that there will be "additional technical reporting required at time of local plans, upon determination of major network alignments." Without determined major network alignments being presented in the plan, it is difficult to understand the association between land use and transportation within the ASP.

As local plans are non-statutory and will not be reviewed by the Board in the future, the Board will not have the opportunity to confirm that Elbow View ASP is consistent with Principle 3 and the Policies in Section 3.4. New Freestanding Settlement Areas of the IGP.

2. IGP policy 3.4.3.1 e) states that new freestanding settlement areas shall be planned to "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 services providers at the appropriate time."
 - The location and provision of community and institutional uses is deferred to the local, non-statutory planning phase as per Elbow View ASP Policy 18.1 which



states that "Local plans shall support recreation, culture, institutional, and community uses in accordance with the recommendations of applicable County standards, guidelines, and plans."

As local plans are non-statutory and will not be reviewed by the Board in the future, the Board will not have the opportunity to confirm that Elbow View ASP is consistent with Policy 3.4.3.1 e) of the IGP.

3.1.3 Lack of Sufficient Detail and Technical Review within the Elbow View ASP

The policies of the Elbow View ASP defer significant details around land use and servicing matters future non-statutory local plans. Although technical studies were undertaken, their general purpose was to review options for water and wastewater, stormwater and transportation. As described in the Council Report submitted as part of IREF 2021-10 (see page 4), four technical studies were prepared to support the ASP:

- Water and Wastewater Servicing Options Study;
- Desktop Environmental and Historical Baseline Assessment;
- Stormwater Servicing Options Study; and,
- Transportation Servicing Options Study.

As noted in the Council Report submitted with the IREF 2021-10 package, "the studies identify future infrastructure needs and required upgrades to support the proposed land uses based on preliminary assumptions" (see page 4). CMRB Administration cannot confirm that the preliminary assumptions underpinning the technical studies are sufficient to assure the Board that any potential adverse impacts of the proposed development are mitigated within the ASP, especially given the amount of planning and servicing detail that is deferred to the non-statutory local plans. This is particularly apparent around regional transportation corridors and water quality.

CMRB Administration and the third-party IREF consultants do not review the specific conclusions and mitigation strategies presented in professionally completed technical studies, but it is important these studies be conducted, as appropriate. Technical review of proposed development confirms that there is a clear and technically-sound transportation and servicing strategy in place and that the ASP includes policies that mitigate material impacts to regionally significant systems.

As noted in the third-party review, "The ASP defers critical municipal servicing matters to a non-statutory level of planning level of planning. Municipal infrastructure development is not integrated with the land use strategy and therefore is **not consistent** with the CMRB Interim Growth Plan" (emphasis original) (see page 2 of the third-party review).

1. IGP Policy 3.4.3.1 d) notes that new freestanding settlement areas shall be planned to "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."

- The Elbow View ASP does not provide a single approach to water and wastewater servicing, but rather it presents 3 options for wastewater servicing and defers



much of planning for water servicing to local plans. Options are shown on Map 12: Water and Waste Water Servicing Options.

Given the lack of a single preferred servicing option for water, wastewater and for stormwater, along with associated supporting technical analysis on a preferred option, CMRB Administration cannot confirm that the requirements of the IGP are being met.

2. Principle 2, Objective A of the IGP notes that member municipalities will work to ensure that new statutory plans will "manage the risks to water quality, quantity, and drinking water sources in accordance with federal and provincial legislation and regulation."
 - As noted in Section 21 Water Servicing, details around water licensing, the alignments and extents of the water servicing system, water network analysis and water shortage plan have been deferred to local plans. It is not clear if the proposed development will sufficiently manage the risks to water quality, quantity or drinking water sources as required by the IGP.
 - As described in Section 21 Water Servicing, the Elbow View ASP will be developed with "all water servicing infrastructure, including treatment, meeting standards required by the Province at time of local plans" (see page 64). It is unclear if the options presented will meet provincial requirements once more details are known and, as this information is deferred to local plans, there will no be further opportunities to confirm consistency with the IGP.
 - There is no stormwater management plan/master drainage plan for the site that would support a better understanding of how any impacts to water quality from the proposed development will be mitigated. Policy 24.1 of the Elbow View ASP states that "At time of initial local plan, the applicant shall submit a Master Drainage Plan for the entire Plan area." Although such technical studies are not specific requirements of the IGP, they do serve to assure the Board that a coordinated plan for managing the adverse impacts of stormwater on water quality have been adequately considered.

Given the lack of a single preferred servicing option for water, wastewater, and stormwater, along with associated supporting technical analysis that outlines how any adverse impacts to regional systems are to be mitigated, CMRB Administration cannot confirm that the requirements of the IGP are being met. In addition, as local plans are non-statutory and will not be reviewed by the Board in the future, the Board will not have the opportunity confirm that Elbow View ASP is consistent with Principle 2, Objective A of the IGP.

3. The IGP states member municipalities will work to ensure that new statutory plans and amendments to existing statutory plans address the following Principles and Objectives, including Principle 1 Objective D: "Protect the function of regionally significant mobility and transmission corridors." Furthermore, Policy 3.5.1.1.c) of the IGP states that proposed statutory plans shall "provide mitigation measures and



policies to address identified/potential adverse impacts on regionally significant mobility corridors.”

- Highway 8 is a regionally significant mobility corridor that bisects the Elbow View ASP. Although the ASP is supported by a Transportation Servicing Options Study, CMRB Administration cannot confirm that this study provides mitigative measures for a preferred transportation option and how this study relates to the policies provided in the ASP.
- The Elbow View ASP does speak to the need for traffic impacts assessments but defers them to future planning work that is non-statutory. Policy 20.5 notes that “A transportation impact assessment shall be required as part of the local plan preparation and/or subdivision application process, where applicable.” As discussed in the third-party report regarding policy 3.5.1.1 of the IGP, “A traffic impact assessment is required to determine the impact of new residential and commercial development on Highway 8” (see page 5 of the third-party report).
- The population range for the proposed development varies significantly, noted as being between 10,000 and 18,000 people. As stated in the Elbow View ASP, “This ASP is a multi-decade development vision, as such density and population ranges presented herein ensure the necessary flexibility for the Plan to adapt over time” (see page 26 of the Elbow View ASP). The flexibility inherent in the plan, with no general allocation of dwelling units and employment numbers, wide ranges in density (net density ranges from 3.50 - 7.50 upa), and no density ranges provided for certain development areas, makes it difficult to understand if the impacts of the development on regionally significant mobility corridors are fully understood and mitigated.

As local plans are non-statutory and will not be reviewed by the Board in the future, the Board will not have the opportunity confirm that Elbow View ASP is consistent with Principle 1 Objective D of the IGP and policy 3.5.1.1 of the IGP.

3.2 Efficient Use of Land

In the IGP, efficient use of land is defined as, “a pattern of land-use that minimizes over time the amount of land required for development of the build environment and may include, as appropriate to the local context, walkable neighbourhoods, a mix of land uses (residential, retail, workplace and institutional), multi-modal transportation access, and efficient and cost-effective servicing” (see IGP Glossary).

- There is insufficient detail presented in the Elbow View ASP to review the integration of land use and infrastructure, mix of uses, mobility choices and community services and facilities and other considerations highlighted in the IGP.
- There are insufficient metrics or criteria provided in the IGP to determine how much density or what mix of uses could or should be defined as “efficient use of land” when considered along with the Region’s diversity of community forms. The IGP provides that efficient use of land is “as appropriate to the



local context" and may include "walkable neighbourhoods, a mix of land uses (residential, retail, workplace and institutional), multi-modal transportation access, and efficient and cost-effective servicing." In its recommendation, CMRB Administration must also consider the IGP's additional objective to "recognize and complement the Region's diverse community visions and desired scales of development" (IGP Principle 3, Objective B).

- Given that the IGP does not provide clear criteria to define "efficient use of land" and development must be considered "as appropriate" to the local context, CMRB Administration has relied on member municipalities to outline how proposed developments offer an efficient use of land as appropriate to the local context. This is done in recognition of diverse community visions and desired scales of development.
- Notwithstanding the above, the population for the proposed development ranges significantly, noted as being between 10,000 and 18,000 people. The flexibility inherent in the Plan, lack of general allocation of dwelling units, and a wide range of densities/development types, makes it difficult to determine if there is, indeed, an efficient use of land proposed.

3.3 Demonstration of Collaboration to Coordinate (IGP Policy 3.2.2)

Section 3.2.2 of the IGP requires, at a minimum, that municipalities "demonstrate collaboration to coordinate" on new Area Structure Plans or amendments to existing Area Structure Plans within 1.6 km of a neighbouring municipal boundary or an agreed upon notification area between member municipalities. The ASP amendment area boundary is located adjacent to the Rocky View County's municipal boundary with Rocky View County.

IREF Application 2021-10 is consistent with the requirements of Policy 3.2.2. As described in the IREF Alignment Statement provided by the Rocky View County, "Section 5 [of the ASP] details the Intermunicipal Engagement process with The City of Calgary, which included three separate video conferences and presentations, and several emails and letters" (see page 12 of the Rocky View County's IREF Alignment Statement). The IREF Alignment Statement also notes that "Section 27 of the ASP (Intermunicipal Coordination and Cooperation) can be considered a statutory instrument that details further planning and communication requirements for local plans, redesignations, and subdivision as they arise in the ASP area" (see page 11-12).

The City of Calgary's concerns were not addressed. The Council Report submitted by Rocky View County as part of the IREF 2021-10 application includes a letter of objection from the City of Calgary. The City of Calgary notes that, "At this time, The City of Calgary does not support the Elbow View Area Structure Plan and the due to the potential significant transportation, servicing, and stormwater impacts that could cause detriment to The City of Calgary" (see page 11 of the Rocky View County Council Report). The letter from the City of Calgary includes additional information outlining



and describing their concerns (see pages 11 to 19 of the Rocky View County Council Report).

4.0 Recommendation

That the Board **REFUSE** IREF Application 2021-10, the Rocky View County Elbow View Area Structure Plan.

IF the Board chooses to approve IREF 2021-10, 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 2021-10 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.



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June 3, 2021

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

Dear Mr. Copping:

Reference: IREF 2021-010 - 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.

A handwritten signature in blue ink, appearing to read 'O. Lovatt'.

O. Lovatt, RPP, MCIP
Principal

Attachment: IREF 2021-10

Interim Regional Evaluation Framework (IREF) Third Part Review

Member Municipality	Rocky View County
Application Name	Elbow View Area Structure Plan
IREF Number	2021-010
Type of Application	New Area Structure Plan
Municipality Bylaw #	C-8111-2020
Date of Application	May 28, 2021
Date of Third-Party Review Report	June 3, 2021

Findings

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

Summary of Review

- Rocky View County has submitted an application to approve the Elbow View Area Structure Plan (ASP) to the Calgary Metropolitan Region Board (CMRB) for an Interim Regional Evaluation Framework ("IREF") review.
- The proposed ASP applies to over 900 hectares (2,200 acres) 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 will create a "new freestanding settlement area" which is defined as a development type in the Interim Growth Plan (IGP).
- Some 68 percent of the Plan area is proposed to be primarily single family residential developments with duplex/semi attached, and medium density housing types.
- Total population is forecast at build-out to ranges widely from 10,000 to 18,000 persons. The ASP proposes 2.5 to 7.0 units per gross acre (6.2 to 17.3 units per gross hectare) for the residential area but does not provide similar density measure for the Village Centres, Core or Commercial.
- The ASP proposes that primarily single family residential development surround a linear commercial corridor extending north/south with two village centres located at either end of the corridor.
- Core, Commercial and Village Centre type uses that are defined by the ASP (Figure 01).
- Securing an adequate supply of water for the entire area is downloaded to the creation of the first local plan. A new water intake in the Elbow River basin and treatment plant is proposed.
- The same local plan will be required to determine a viable wastewater treatment system for the entire ASP area as well as a master drainage plan. Detailed assessment of the transportation system will also be completed as part of the initial local plan.

- The ASP defers critical municipal servicing matters to a non-statutory level of planning level of planning. Municipal infrastructure development is not integrated with the land use strategy and 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 this ASP is adopted.
- As such, the efficiency of the ASP in terms providing municipal services also cannot be confirmed.
- Given the size of the Plan area it is considered prudent that confirmation occur.

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 be submitted by an applicant at the time of an initial local plan for the entire Plan area.

Principle 3: Encourage Efficient Growth and Strong and Sustainable Communities

- 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.

3.2.2

Demonstrate
collaboration to
coordinate with other
member
municipalities

- 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.
- Calgary has stated that the type of development being contemplated is not in keeping with the County Plan and belong in neighbouring urban municipalities.
- Although not a member municipality the Tsuut'ina Nation was provided engagement opportunities including a site visit.
- Examples of collaboration with the Tsuut'ina Nation are evident in the ASP.



3.2.3 Water, wetlands and storm water	<ul style="list-style-type: none"> Deferring the source water to the initial local plan is contrary to the requirement that all statutory plans shall protect the quality and quantity of source water. Determining the extent of Crown ownership of wetlands is to be done at the local plan level.
3.3 Flood Prone Areas	
3.3.1 Development in the floodways	<ul style="list-style-type: none"> The Flood Fringe and Floodways for the Elbow River are illustrated on a map and are referenced in an appropriate policy.
3.3.2 Flood protection in flood fringe areas	<ul style="list-style-type: none"> The proposed ASP includes policies to include flood protection measures.
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.
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	<ul style="list-style-type: none"> Not applicable.
3.4.3 New Freestanding Settlement Areas	
3.4.3.1 New freestanding settlement areas	<ul style="list-style-type: none"> The mix of uses proposed for the plan area are: <ul style="list-style-type: none"> Residential at 64 % Core at 2% Commercial at 2% Natural environment at 11% Parks and Open Space at 13% Public Utility Lots at 8% The 1,400 acres of contiguous single family residential development is not an <i>efficient use of land</i>.
3.4.3.2 New freestanding settlement areas with 500 or greater new dwelling units	<ul style="list-style-type: none"> Designated commercial areas propose office and retail development typologies to support local employment. Transit planning is to be done at the local plan level.



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	<ul style="list-style-type: none"> Not applicable.
3.4.4 Country Residential Development	
3.4.4 Country Residential Development	<ul style="list-style-type: none"> Not applicable.
3.4.5 Employment Areas	
3.4.5.1 Employment areas	<ul style="list-style-type: none"> Not applicable.
3.4.5.2 Connections to transit stations and corridors	<ul style="list-style-type: none"> Not applicable.
3.5 Regional Corridors	
3.5.1.1 Mobility Corridors	<ul style="list-style-type: none"> Highway 8 is shown as a Level 2 Highway in the IGP. A traffic impact assessment is required to determine the impact of new residential and commercial development on Highway 8.
3.5.2.1 Transmission Corridors	<ul style="list-style-type: none"> Transmission corridors are identified in Appendix C of the ASP.