



- 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', is written over the typed name.

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.

<ul style="list-style-type: none"> 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. 	
<p>Review Prepared by Lovatt Planning Consultants Inc.</p>	
<p>3.2 Region-wide Policies</p>	
<p>3.2.1 Principles, Objectives, and Policies</p>	<p>Principle 1: Promote the Integration and Efficient Use of Regional Infrastructure:</p> <ul style="list-style-type: none"> 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. <p>Principle 2: Protect Water Quality and Promote Water Conservation</p> <ul style="list-style-type: none"> 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. <p>Principle 3: Encourage Efficient Growth and Strong and Sustainable Communities</p> <ul style="list-style-type: none"> 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.
<p>3.2.2 Demonstrate collaboration to coordinate with other member municipalities</p>	<ul style="list-style-type: none"> 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.

<p>3.2.3 Water, wetlands and storm water</p>	<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	
<p>3.3.1 Development in the floodways</p>	<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.
<p>3.3.2 Flood protection in flood fringe areas</p>	<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	
<p>3.4.1.1 Intensification and Infill in existing settlement areas in cities, towns, and villages</p>	<ul style="list-style-type: none"> • Not applicable.
<p>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:</p>	<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.

<p>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</p>	<ul style="list-style-type: none"> • Not applicable.
<p>3.4.4 Country Residential Development</p>	
<p>3.4.4 Country Residential Development</p>	<ul style="list-style-type: none"> • Not applicable.
<p>3.4.5 Employment Areas</p>	
<p>3.4.5.1 Employment areas</p>	<ul style="list-style-type: none"> • Not applicable.
<p>3.4.5.2 Connections to transit stations and corridors</p>	<ul style="list-style-type: none"> • Not applicable.
<p>3.5 Regional Corridors</p>	
<p>3.5.1.1 Mobility Corridors</p>	<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.
<p>3.5.2.1 Transmission Corridors</p>	<ul style="list-style-type: none"> • Transmission corridors are identified in Appendix C of the ASP.