



February 3, 2021

Rocky View County Offices
262075 Rocky View Point
Rocky View County, AB, T4A 0X2

To: Ms. Theresa Cochran
Executive Director, Community Development Services, Rocky View County

Mr. Dominic Kazmierczak,
Manager, Planning Policy, Rocky View County

Re: [Rocky View County's North Springbank and South Springbank Area Structure Plans](#)
The City of Calgary's submission to Rocky View County's Public Hearings

Dear Ms. Cochran and Mr. Kazmierczak:

This letter is intended to provide The City of Calgary's Administration position on Rocky View County's proposed North Springbank Area Structure Plan and South Springbank Area Structure Plan.

At this time, The City of Calgary does not support the North Springbank Area Structure Plan and the South Springbank Area Structure Plan due to significant transportation, servicing, and stormwater impacts that could cause detriment to The City of Calgary.

More specifically (and as previously detailed in The City of Calgary's letters of January 8, 2021 and June 8, 2020), The City of Calgary has the following five concerns with the proposed North Springbank Area Structure Plan and South Springbank Area Structure Plan. The following comments are applicable to both Plans:

1. Addressing impacts on Calgary infrastructure and services

The plans project an estimated 32,490 people will live in this area. The City of Calgary is concerned with the significant amount of growth proposed, due to the limited policies to mitigate detrimental impacts to City of Calgary services and infrastructure and the lack of cost-sharing for required upgrades and increased usage. The plans do not provide an approach to respond to the cumulative impacts of the proposed growth, rather defers the responsibilities to the Local Plan. This approach only addresses infrastructure, rather than

community services, such as recreation, and does not provide an approach that explores cost-sharing (where appropriate) between the municipalities. The draft plans do not align with the Interim Growth Plan, specifically; Principle 3, Objective e. of the Interim Growth Plan states “Ensure the provision or coordination of community services and facilities”. Currently, our municipalities do not have a cost-sharing agreement in place to address this. **Additional policy is required to ensure that growth in Rocky View County does not detrimentally impact infrastructure, services and facilities provided by The City of Calgary.** The City would request that the County commit to meaningfully alleviate the potential impacts on The City of Calgary.

2. Need to identify priorities for growth

The draft land use scenarios provide for a large amount of growth within the plan areas adjacent to sensitive regionally significant infrastructure. There is an apparent lack of growth management policies within the plans, Rocky View County noted that the build out will be driven by market conditions. This approach will lead to fragmented development scattered throughout the plan area that will have lasting cumulative effects on water supply, servicing arrangement, and offsite transportation impacts. **This suggests that there is a need for further growth management policies directing development and servicing in a comprehensive manner.**

3. Source Water Protection

The City acknowledges that Rocky View County is in full agreement that source water protection is an important consideration for the region. The Calgary Metropolitan Region Board’s Interim Growth Plan requires that mitigation measures and policies be provided to address potential adverse impacts to regionally significant infrastructure such as the Bearspaw Water Treatment Plant. Without additional details outlining the cumulative impacts (including a baseline assessment), how piped services will be provided for the plan area prior to local plan approval, phasing and strengthened alignment with higher order Provincial and Regional plans, The City cannot support the plans and has concern about how development could have detriment to a major source water supply for our region.

Further concerns are detailed in our letter of January 8, 2021. In our view, the proposed Municipal Development Plan is not in alignment with the principles of the Interim Growth Plan as there could be large impacts on regional infrastructure, source water quality, and promotes inefficient use of land. **Additional policy is required to support the sustainability of our region’s long-term drinking water supply.**

4. Transportation Impacts

The full build out of the North and South Springbank Plan areas will result in the need for significant need for new or expanded major infrastructure in both Rocky View County and The City of Calgary. A significant amount of development is proposed to be located along Calgary’s western boundary where they are expected to impact Calgary’s transportation system. The plans do not provide an approach to respond to the cumulative impacts of the

proposed development and does not propose or establish a cost-sharing framework between the municipalities that is mutually agreeable to fund infrastructure necessary to support the proposed development. The City is concerned with the resulting traffic impacts identified in the Network Analysis including excessive traffic volumes that are not supported by an appropriately sized highway and road network. **Additional policy is required to ensure that development proposals consider and mitigate the cumulative impacts on The City of Calgary's transportation network.**

5. Special Planning Areas

The City of Calgary would request further discussion and collaboration on building policies for special planning areas, and urban interface areas. There continues to be limited policies for these areas leading to a large amount of uncertainty. **The City is requesting further Administrative meetings to clarify intent and provide additional policy language for these areas.** Strengthening of policies for these areas would be beneficial to both Rocky View County and City of Calgary while providing greater certainty for residents and developers in both municipalities.

If it is understood that Rocky View County Administration may be considering bringing forward amendments to the Plan to address the concerns outlined in this letter. However, given the outstanding concerns identified in this and previous letters (attached), The City of Calgary does not support the approval of either the North or South Springbank Area Structure Plans. We would ask that our municipalities work together to resolve these issues in a meaningful way. **Therefore, The City of Calgary would request that Rocky View County not give second reading to either Plan but rather direct Administration to work with The City of Calgary' Administration to resolve the above identified concerns.** A short delay would enable our Administrations to continue to work together to resolve these outstanding issues in a meaningful, mutually beneficial manner.

Should Rocky View County Council give Second Reading to the North Springbank Area Structure Plan or the South Springbank Area Structure Plan, The City of Calgary would request that (in alignment with our jointly adopted Intermunicipal Development Plan) Rocky View County agree to enter into mediation to resolve the identified concerns.

Thank you,



Christine Arthurs, BA MEDES (Planning) RPP, MCIP
Acting General Manager
Deputy City Manager's Office
The City of Calgary

Attachments (2)

cc: Stuart Dalgleish, General Manager, Planning & Development, The City of Calgary
Kelly Cote, Manager, Intergovernmental & Corporate Strategy, The City of Calgary