

BYLAW 8635 – 2025 – MUNICIPAL DEVELOPMENT PLAN
Comments for Public Hearing on July 10, 2025
Submitted by Rocky View Forward

The June 2025 draft Municipal Development Plan (MDP) being considered at the July 10th public hearing is significantly better than the earlier draft released in May. We thank Administration for listening to residents' concerns and making so many substantive changes in such a short time.

We were particularly glad to see that many of the "should" clauses have been replaced by stronger "shall" clauses. From our perspective, the MDP needs to provide clear direction on the County's intentions for future development in Rocky View. "Shall" statements achieve this objective far more successfully.

Unfortunately, the revised draft still raises serious concerns that we hope council will address at the July 10th public hearing. These concerns focus on the MDP's policies dealing with agriculture, country residential development, highway business hubs, and interim uses.

Agriculture Policies

Why is agriculture no longer part of the MDP's vision for Rocky View?

We do not understand why the MDP's vision no longer refers to the importance of agriculture, especially given that one of the key themes throughout the MDP's public engagement was a strong desire to preserve agricultural land. The "vision" in the County Plan was to "balance agriculture with diverse residential, recreational and business opportunities". The new "vision" sees Rocky View as "home to diverse communities offering a range of rural lifestyles and opportunities for residents and businesses".

This missing reference to agriculture is concerning given that many of the specific policies in the Agriculture section of the proposed MDP raise serious questions about its overall commitment to preserving and protecting the County's agricultural land and agricultural operations.

Why are the acceptable uses on ag land so broad?

Policy 11.6's assertion that "development in agricultural areas shall protect agricultural lands to the greatest extent possible" is seriously eroded by the breadth of uses that the policies then go on to identify as acceptable on ag land.

We understand the logic in working towards consistency between the proposed MDP and the Agriculture Master Plan that is currently being revised. However, the definitions of "agri-business" and "agri-tourism" that have been adopted from the draft Agriculture Master Plan are excessively broad. As a result, these policies risk being used to justify commercial development on ag land that should more appropriately be in areas identified for business development. For example, the definition of "agri-tourism" includes "tourism that generates supplemental income for an agricultural producer".

This is vague enough to include any tourist operation, whether or not it has any connection to the agricultural operations.

These concerns were dramatically accentuated by the addition of Policy 11.14 that had not been part of the previous draft MDP. This policy states that “culture, tourism, and hospitality uses that do not primarily support or involve agriculture may be supported in agricultural areas.” This new policy appears to have come “out of the blue”. We fail to understand its addition since most proposals for developments that fit within this category have been contentious because of their negative impacts on surrounding agricultural operations. It is also not clear how this addition is consistent with the MDP’s overall commitment to protect and preserve ag land.

Why is the MDP encouraging further fragmentation of ag land?

We understand the original motivation for first parcels out, which was to allow farmers/ranchers who were retiring from active ag operations to remain in their communities by subdividing a small parcel from their home quarter section. However, experience demonstrates that this policy has resulted in fragmentation of ag land far beyond the policy’s original motivation.

Given this experience, we fail to understand how permitting second parcels out in addition to first parcels out will avoid even more fragmentation of ag land. Changing their names from “parcels out” to “farmsteads out” will not protect against fragmentation. While we acknowledge that the proposed policies attempt to provide some limitations on second farmsteads out, introducing this possibility can only be supported by those looking to profit from the subdivision of ag land, not those truly interested in preserving family farming/ranching operations.

An agricultural quarter section can already have two houses, each of which can have an accessory dwelling unit. As a result, beyond the third house and accessory dwelling unit that are already available through a first farmstead out, how can further subdivision be needed to preserve an ag family’s ability to maintain their operations?

Country Residential Policies

Why has the MDP ignored consistent feedback on defining country residential communities?

The draft MDP being considered at the July 10th public hearing is better than the previous draft in that it no longer uses the word “clustered” to describe the default form of residential development in country residential communities. However, the elimination of this highly contentious word is the only change that was made.

Policy 8.3 still states that country residential development “should be designed to use land efficiently and to achieve a reduction in the overall development footprint of the community”, with the “permanent retention of a portion of developable land as open space”. That is the definition of clustered development. As a result, the policies have not fundamentally changed even though concerns regarding this policy featured predominantly in the feedback on the previous draft.

These concerns are aggravated by Policy B2.1 which mandates that amended ASPs “shall be directed by the policies of this Plan”. This raises serious concerns for the longevity of the recent changes to the Springbank and Bearspaw ASPs that clearly identify their country residential communities as having parcel sizes no smaller than 2 acres.

We see no problem with continuing the County Plan’s approach which encourages consideration of clustered development. However, insisting that this is the default development form flies in the face of longstanding feedback that emphasizes the importance of preserving the rural character of country residential communities.

For the MDP to reflect the longstanding and consistent feedback on this issue, it needs to define country residential development as having parcel sizes of 2 acres or larger, unless a community-specific planning document provides otherwise.

Business Hubs

Why is the MDP providing for indiscriminate business development along highways?

While we were encouraged by the tightening of the policies for regional business hubs and the removal of the proposed rural business hubs, we still have serious concerns with the policies for highway business hubs.

The overall objectives for business hubs state that these policies are intended to “support strategic business growth”. While the policies for regional business hubs are targeted to achieve this objective, it is not clear how business providing “access to goods and services for the travelling public” fit within the scope of even broadly defined strategic businesses.

These policies will permit commercial development at virtually any intersection or interchange along provincial highways throughout the County. This flies in the face of the MDP’s assertion that it will focus business development into the County’s approved employment areas.

Interim Uses

Why is the MDP encouraging interim uses in all ASPs?

We fail to understand why the MDP proposes to mandate that all new or amended ASPs must include policies to encourage interim uses. To the best of our recollection, interim uses were not part of the MDP engagement and there are no references to it in the “what we heard” reports. As well, this concept was considered and soundly rejected in earlier drafts of the Springbank ASP.

The considerations provided for these uses in Policy B2.6 provide minimal guidance on how such uses will be assessed and what will qualify as an “interim use”. As a result, this policy risks land uses within ASPs that bear little resemblance to the uses identified in the ASP’s land use strategy under the guise that the use is only “interim”.

Sharon M Fulton-Heron

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Spruce Grove, AB T7X 3R9

[REDACTED]
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June 27, 2025

Planning & Development Services

County of Rocky View

262075 Rocky View Point

Rocky View County, AB T4A 0X2

Subject: Request for Municipal Development Plan Amendment and Rezoning of 31-22-27 (east of Indus) from Agricultural to Industrial

Dear Members of Council and Planning & Development Services,

I am writing to formally request an amendment to the Municipal Development Plan (MDP), which is currently being reviewed, and the rezoning of our property located **east of Indus** (31-22-27) from Agricultural (A) to Industrial (I). This change is in response to strong regional economic signals and demand for industrial land.

Strategic Location & Infrastructure Synergy

Our parcel lies adjacent to vital transportation corridors (proximity to Highway 22X/Indus, Canadian Pacific Kansas City Rail “CPKC” access) and is well suited for industrial use. Its strategic positioning minimizes land-use conflict while optimizing infrastructure use and regional economic alignment. The land is approximately 6.1 kilometers from the Eastern border of the City of Calgary and approximately 24 kilometers from downtown Calgary.

We are also located immediately east of Fulton Industrial, which is recognized by the County as a Distinct Community Area.

Industrial Market Demand & Absorption Rates

According to recent market research from Colliers and CBRE on the Greater Calgary Area:

- Net industrial absorption in 2024 reached approximately **4.2 million sq ft**, matching the 10-year average of 3.9 million sq ft.
- Calgary experienced nine consecutive quarters of positive absorption, with vacancy hovering between **3.2 – 5.8%**.
- Our land is directly east of Fulton Industrial, a 525 acre industrial business park.

www.fultonindustrial.ca

Fulton Industrial Park offers affordable industrial lots with many competitive advantages, making it attractive to businesses hoping to locate into Rocky View County. This development has experienced positive momentum in the past few years and the developer expects that they will sell out of their land position in the foreseeable future.

These statistics confirm a **tight industrial land market**, driven by robust demand and limited available inventory—especially in well-located parcels like ours.

Benefits of Rezoning

Rezoning our land to industrial will yield multiple benefits:

1. **Stimulate local economic growth and employment** – attract logistics, manufacturing, and distribution businesses.
2. **Diversify tax base** – non-residential assessment strengthens the County’s financial resilience.
3. **Align supply with demand** – directly mitigate regional shortages in industrial parcels.
4. **Promote efficient infrastructure use** – reduces need for speculative greenfield projects elsewhere.

We will coordinate with County administration on infrastructure upgrades, environmental protection, buffering, and compliance with provincial planning policy.

We respectfully request that the rezoning of this property east of Indus be considered when finalizing this MDP or as a standalone amendment. We would welcome the opportunity to present our case in person and collaborate on ensuring the development complements County and regional priorities.

Thank you for your consideration. We are excited to help support Rocky View County’s evolving competitiveness and prosperity.

Sincerely,

Sharon Fulton-Heron

[REDACTED]
[REDACTED]

June 27, 2025

VIA EMAIL TO: legislativeservices@rockyview.ca

Re: Failure to Consult Bearspaw First Nation in the Creation of Rocky View County's Municipal Development Plan (MDP)

Dear Members of Council,

We are writing to formally express our concern regarding the development and adoption of Rocky View County's Municipal Development Plan (MDP), most recently updated in June 2025.

As Council is well aware, Bearspaw First Nation is an established landholder within the County and has made its intentions clear with respect to the long-term development of its lands in the Springbank area.

Further, we note with disappointment that:

- The MDP fails to reference Bearspaw First Nation or our lands, save for a notation on maps of location of Stoney Nakoda lands and more generically, to First Nations in policy statements, and
- There is no evidence of meaningful consultation with Stoney Nakoda First Nation (or Îyârhe Nakoda), comprising Bearspaw First Nation, Chiniki First Nation, and Goodstoney First Nation, during the MDP's drafting process.

Given Bearspaw First Nation's ambitions to zone its land as fee-simple commercial highway development and/or as an urban reserve, the failure to engage with us during the development of a statutory planning document that directly affects our lands is a failure of process and of good planning practice.

Further, the County's failure to engage with us goes against the Province of Alberta's constitutional duty to consult, as outlined in Section 35 of the Constitution Act, 1982, where actions by municipal delegates have the potential to adversely impact Indigenous interests or delay the realization of Treaty rights or land development goals.

Let us be clear: Bearspaw First Nation's lands are not speculative holdings. We are actively pursuing economic development in line with our inherent rights, Treaty obligations, and modern governance frameworks. To proceed with a long-range Municipal Development Plan without formally acknowledging or integrating these facts is planning in bad faith.

We therefore respectfully request that:

1. Section 10.3 be rephrased to read: "New or amended Regional Business Hubs shall have either of a master site development plan or an area structure plan prior to new development." Bearspaw First Nation's interests in its lands within Rocky View County and its objectives to develop the same should allow for either process to follow, with the County have the option to the further develop the precise, specific rules to apply to each process in future planning and policy documents for this purpose. Bearspaw First Nation's project to develop its lands within the County is a prime opportunity to pilot the application of either process to it. However, the current language used in Section 10.3 is limiting at the outset as it is currently phrased.

2. The County acknowledge, in the language of the MDP, that First Nations are not necessarily *only* Intergovernmental Partners where First Nations have acquired a legal and beneficial interest in lands within the boundaries of land within the MDP. Section 21.0 of the MDP currently only contemplates the County's collaboration with First Nations on the basis that their lands might neighbour or border Rocky View County. There is no express contemplation of the treatment of First Nations when their lands are within the boundaries of Rocky View County and they have the capacity of landholders, and how the County will then respond and work with First Nations.
3. Section 21.0 of the MDP be revised to speak more directly to the special constitutional role and status of First Nations in Canada. Currently, the language of Section 21.0 does not adequately distinguish the unique role of First Nations and rather more generically treats them as akin to Foothills County, a neighbouring municipality to the County. The law of Canada does not support identical treatment.
4. A process of formal consultation be initiated with Bearspaw First Nation regarding all future statutory planning in and around our lands;
5. The Province of Alberta review whether its duty to consult has been triggered by the adoption of the MDP and issue clear guidance to Rocky View County; and
6. No further zoning changes, infrastructure planning, or secondary plans be advanced that may affect Bearspaw lands without direct Nation-to-Nation engagement.

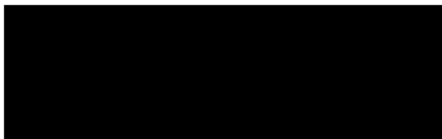
We are open to meeting with County officials in the coming weeks to establish a collaborative path forward and to ensure that Bearspaw's voice is properly reflected in all planning processes moving ahead.

Sincerely,

Rob Shotclose, CEO



Bearspaw First Nation



June 27, 2025

VIA EMAIL TO: legislativeservices@rockyview.ca

Re: Failure to Consult Bearspaw First Nation in the Creation of Rocky View County's Municipal Development Plan (MDP)

Dear Members of Council,

We write on behalf of our development partner, Bearspaw First Nation, to formally express our concern regarding the development and adoption of Rocky View County's Municipal Development Plan (MDP), most recently updated in June 2025.

As Council is well aware, Bearspaw First Nation is a landholder within the County and has made its intentions clear with respect to the long-term development of its lands in the Springbank area.

Further, we note with disappointment that:

- The MDP makes minimal reference to Bearspaw First Nation or its lands, save for a notation on maps of the location of Stoney Nakoda lands and more generically, to First Nations in policy statements, and
- There is no evidence of meaningful consultation with Stoney Nakoda First Nation (or Îyârhe Nakoda), comprising Bearspaw First Nation, Chiniki First Nation, and Goodstoney First Nation, during the MDP's drafting process.

Given Bearspaw First Nation's ambitions to zone its land as fee-simple commercial highway development and/or as an urban reserve, the failure to engage with them during the development of a statutory planning document that directly affects their lands is a failure of process and of good planning practice.

Further, the County's failure to engage with First Nations goes against the Province of Alberta's constitutional duty to consult, as outlined in Section 35 of the Constitution Act, 1982, where actions by municipal delegates have the potential to adversely impact Indigenous interests or delay the realization of Treaty rights or land development goals.

Specifically egregious, policies promised for future engagement and collaboration with First Nations in Section 21.0 of the draft MDP would be meaningful if the current engagement process had followed its own advice, rather than deferring to a future stage / state. The reference to "continued" engagement with First Nations is therefore not encouraging as there has been no engagement initiated by the County in the MDP process to Bearspaw First Nation.

Reference: 21.9 The County will continue to communicate and consult with First Nations neighbours on matters of mutual interest.

Bearspaw First Nation is actively pursuing economic development in line with inherent rights, Treaty obligations, and modern governance frameworks. To proceed with a long-range Municipal Development Plan without formally acknowledging or integrating these facts is planning in bad faith.

We therefore respectfully request that:

1. Section 10.3 be rephrased to read: "New or amended Regional Business Hubs shall have either of a master site development plan or an area structure plan prior to new development." Bearspaw First Nation's interests in its lands within Rocky View County and its objectives to

develop the same should allow for either process to follow, with the County have the option to the further develop the precise, specific rules to apply to each process in future planning and policy documents for this purpose. Bearspaw First Nation's project to develop its lands within the County is a prime opportunity to pilot the application of either process to it. However, the current language used in Section 10.3 is limiting at the outset as it is currently phrased.

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4. A process of formal consultation be initiated with Bearspaw First Nation regarding all future statutory planning in and around our lands;
5. The Province of Alberta review whether its duty to consult has been triggered by the adoption of the MDP and issue clear guidance to Rocky View County; and
6. No further zoning changes, infrastructure planning, or secondary plans be advanced that may affect Bearspaw lands without direct Nation-to-Nation engagement.

We are open to joining meetings with County officials and Bearspaw First Nation in the coming weeks to establish a collaborative path forward and to ensure that Bearspaw First Nation's voice is properly reflected in all planning processes moving ahead.

Sincerely,



Jay Simmons, Director

Bow Water & Land and Durum Capital Inc.

