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Please note that your name and comments will be made publicly available in the Council agenda. Your e-mail address will not be included in the public record.

**I have read and understand the above statement.**

**ENDORSEMENT STATEMENT ON TRUTH AND RECONCILIATION, ANTI-RACISM, EQUITY, DIVERSITY, INCLUSION AND BELONGING**

The purpose of The City of Calgary is to make life better every day. To fully realize our purpose, we are committed to addressing racism and other forms of discrimination within our programs, policies, and services and eliminating barriers that impact the lives of Indigenous, Racialized, and other marginalized people. It is expected that participants will behave respectfully and treat everyone with dignity and respect to allow for conversations free from bias and prejudice.

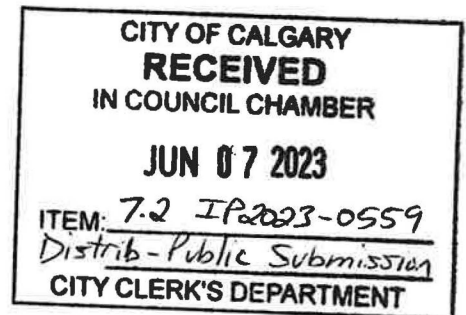
**I have read and understand the above statement.**

First name (required) **Bob**

Last name (required) **Clark**

Are you speaking on behalf of a group or Community Association? (required) **No**

What is the group that you represent?



What do you wish to do?  
(required)

Submit a comment

How do you wish to attend?

You may bring a support person should you require language or translator services. Do you plan on bringing a support person?

What meeting do you wish to attend or speak to? (required)

Standing Policy Committee on Infrastructure and Planning

Date of meeting (required)

Jun 7, 2023

What agenda item do you wish to comment on? (Refer to the Council or Committee agenda published [here](#).)

(required - max 75 characters)

7.2 Citywide Growth Strategy: New Approach to Growth Applications, IP2023-0

Are you in favour or opposition of the issue? (required)

Neither

If you are submitting a comment or wish to bring a presentation or any additional materials to Council, please insert below. Maximum of 15 MB per submission (5 attachments, 3 MB per pdf document, image, video). If you have additional files to attach, email them to [publicsubmissions@calgary.ca](mailto:publicsubmissions@calgary.ca)

Comments - please refrain from providing personal information in this field (maximum 2500 characters)

Attached, please find a letter representing Situated Consulting's comments on the above captioned IPC Item 7.2 as the item relates to landowners with smaller landholdings. Thank you for bringing this matter to the attention of the Standing Committee on Infrastructure and Planning on June 7, 2023.



June 5, 2023

City of Calgary  
Infrastructure and Planning Committee  
City Clerk's Office  
The City of Calgary  
P.O. Box 2100, Station M, Mail Code #8007  
Calgary AB T2P 2M5

**Attn: Councillor Sonya Sharp, Chair**

Dear Councillor Sharp:

**RE: Infrastructure and Planning Committee Meeting June 7, 2023**  
**Item 7.2 Citywide Growth Strategy: New Approach to Growth Applications**

I refer to the above captioned report and have concerns about the introduction of a flat fee for all Growth Applications as it would create a barrier to entry by unfairly limiting the ability of small landowners to prepare a Growth Application. In support of this concern, I wish to bring the following information to the attention of the Committee:

**1. Flat Fee is Not Equitable**

The cost of preparing a Growth Application is approximately the same, regardless of property size. This means that the costs are inequitable for small landowners as they have less property and therefore fewer units over which to bear the cost of this application. A fee which is more proportionate to the size of a smaller landowner's property would serve to recognize this situation.

**2. Financing for the Growth Application Fee**

It is unlikely that this fee and the Growth Application can be financed due to how far in advance of development this process typically occurs. Therefore, a small landowner will likely have to self-finance the fee as well as the cost of the application preparation from within their own resources. A larger landowner can likely finance the application utilizing an existing line of credit supported by a larger landholding or has a rolling list of active projects from which they are able to expense the cost of the Growth Application Fee.

**3. Cooperation with Adjacent Landowners**

It has been indicated that a flat fee system will serve to encourage small landowners to work with larger developers on an application to best maximize return and efficiency on infrastructure. It is unlikely that a large landowner will see the need to cooperate with a small landowner as that would provide for additional competition within the same area and likely add a disproportionate amount of

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value to the small landowner's property with the larger landowner likely paying for the benefit that would be bestowed on the smaller landowner.

#### 4. Consultation with Small Landowners

It is my understanding that no small landowners were consulted when this report was prepared. While BILD Calgary does a very good job of representing the land development industry, it is by its very nature only representative of larger developers who are engaged in the land development business. Smaller owners may not be involved at all with land development issues, the industry at large, or be aware of a new cost base being applied to their land to develop in future. It is recommended that the City engage with small landowners directly in future growth areas to consult with them on the new Growth Application Fee they will incur should they wish to advance their interests to develop their property.

#### Request

To partially offset this situation, it is suggested that the fee be based on an amount that is proportional to the area owned by the landowner. A maximum cap could be set on the fee to recognize that there is a fixed amount of work required for the review of a Growth Application. It is suggested that the fee should be set in consultation with small landowners; however, in the absence of such consultation, the fee could be capped for landholdings that are greater than 16 ha. The fee could be calculated as follows:

\$2040/ha a maximum of \$32,640.

This would mean that landowners, who owned less 16 ha (+/- 40 ac.) would pay an amount that is proportional to their landholdings. The fee would equate to approximately \$100 per unit based on a density of 20 units per hectare.

Thank you very much for considering the above information.

Sincerely

SITUATED 

Situating Consulting



Bob Clark,  
Development and Strategy  
bob@situating.co  
(403) 540-1819

cc: All members of Infrastructure and Planning Committee