

## Letters

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26 June 2023

Attention: Councillor S. Sharp  
Chair of Infrastructure & Planning Committee  
P.O. Box 2100, Stn. M  
Calgary, Alberta T2P 2M5

**RE: REGIONAL GROWTH PLAN CONSIDERATIONS  
JOINT PLANNING AREAS – CALGARY & ROCKY VIEW**  
*North Calgary Regional Study Area 1*  
*East Calgary Regional Study Area 2*

Dear Councillor Sharp,

As a landowner in Rocky View County (N½ 20-25-28-W4M), we are eager to develop our property for low-density, cluster style residential lots, supporting retail, and abundant public open space. We have recently learned that the City of Calgary has engaged in strategic planning actions on joint planning areas between the City of Calgary and Rocky View County. These areas are coincident with the Calgary Metropolitan Regional Board (CMRB) Growth Plan areas associated with growth direction initiatives. Our land is not included in either of Areas 1 or 2. However, servicing infrastructure is existing and proposed at our property boundaries. The approved OMNI Area Structure Plan (ASP) is adjacent to our westerly boundary, and it has a servicing strategy in place as part of the approved ASP:

- potable water proposed to run on the shared county road between us: Range Road 285;
- wastewater to connect to the existing line on our east boundary road, Conrich Road; and
- stormwater management, on-site, as is the case for all developments.

All governing planning documents; the CMRB *Growth and Servicing Plans* and the Rocky View County *Plan* define, through policy, supporting growth in areas where infrastructure is existing or planned through approved ASPs:

### CMRB Growth Plan Policies

*3.1.3.1 New development in Preferred Growth Areas shall make efficient and cost-effective use of existing and planned infrastructure through agreements with service providers and connect to municipally owned services, or piped water and wastewater services provided by others.*

3.1.3.2 *New development in Preferred Growth Areas shall 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 agreements and cost sharing with service providers.*

3.1.5.3 *The Rural and Country Cluster Place type is encouraged to be developed in a country cluster residential pattern, in locations where infrastructure and services can be provided.*

#### Rocky View County Plan Policies

5.9 *New country residential area structure plans or conceptual schemes should not be considered unless (i) existing overall country residential areas are not being significantly developed, and (ii) a need has been demonstrated based on the following criteria:*

- a. consistency with the County's population goals;*
- b. opportunity for community input;*
- c. is an orderly, appropriately sequenced development consistent with a desirable pattern of settlement;*
- d. meeting the financial, environmental, community, and infrastructure goals of this Plan; and*
- e. market demand.*

17.1 *New development shall, in accordance with master plans:*

- a. make use of, extend, and enhance existing utility infrastructure where feasible;*
- b. provide water, wastewater, and shallow utility services; and*
- c. provide stormwater systems where necessary.*

17.2 *Allow a variety of water, wastewater, and stormwater treatment systems, in accordance with provincial/federal regulations and County Policy.*

17.3 *Where required, prepare master plans for existing and future water servicing, wastewater collection and treatment, and stormwater management systems, in existing and proposed growth areas.*

- a. Water, wastewater, and stormwater development shall adhere to the relevant master plan.*

17.9 *New residential development shall provide wastewater treatment, in accordance with County Policy, by: a. connecting to, or constructing, regional or decentralized wastewater services; or b. confirming the lot(s) is capable of private wastewater treatment.*

In conclusion, the lands between the two plan areas qualify to be included in the regional studies as they are prime for development. We hear of an existing housing crisis in Canada, in Alberta, and in the Calgary region, and expect this trend to continue as an immigrant-receiving country with a prosperous economy. Therefore, it is incumbent upon the decision-makers to encourage development through its policies that are in place (see above). Please consider amending the regional study boundaries, per the attached diagram, to align with existing growth policies. Thank you.

Sincerely,

DocuSigned by:  
*Alnoor Velji*  
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Alnoor Velji

President. 403-560-3335

**Country Hills Ranch Inc.**

cc *Darrell Grant, Community Planner*

cc *Wes Andrews, Director*

cc *Azim Lakhoo, Director*



# 2023-2026 Full ASP Work Plan

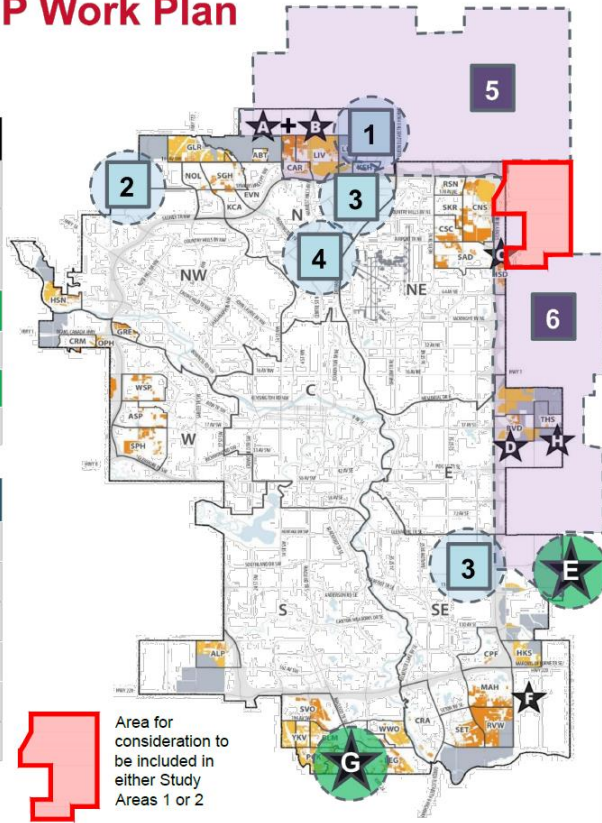
## Requests for New ASPs

<b>A+B</b>	North Regional Context Study - Cells E & F
<b>C</b>	Areas around East Stoney
<b>D</b>	Portion of East Regional Context Study - Cell C
<b>E</b>	Prairie Economic Gateway
<b>F</b>	East Regional Context Study - Cell F
<b>G</b>	West Macleod Residual Lands
<b>H</b>	Portion of East Regional Context Study - Cell C

## Existing ASP Amendments

1	Nose Creek ASP
2	Research and Development Park ASP
3	Existing Industrial ASPs*
4	Aurora Business Park ASP
5	North Calgary Regional Study Area 1
6	East Calgary Regional Study Area 2

\*not all shown on map





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Calgary, AB, T3H 3B6

June 27, 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 July 5, 2023**  
**City Planning Policy Roadmap – Area Structure Plan Update**

This letter has been written on behalf of the landownership group Cells E and F of the North Regional Context Study (Cell E and F Landowners) in response to the above captioned Briefing Report which will be included in the Infrastructure and Planning Committee agenda on July 5, 2023.

#### **Request**

The Cell E and F Landowner Group, respectfully request the following:

- That the Cell E and F Lands be added to the 2023- 2026 Workplan for Area Structure Plans.
- That the Terms of Reference for the Context Study for Joint Planning Area 1 be provided to them for their review.
- That this item be brought before Council as an Item for debate and approval

#### **Rationale**

- Adding the Cell E and F Lands will maintain the housing supply in the north central corridor.
- Adding another ASP to the workplan will provide housing affordability.
- Cell E and F Landowners have been requesting an ASP for two years and some landowners have no other land elsewhere.

#### **Background**

This Briefing Report has been prepared as a follow up to the IPC meeting of February 3, 2022, wherein Administration indicated that requests had been made for the preparation of new Area Structure Plans. The report to IPC indicated that work would be completed to determine the Area Structure Plan sequencing by the end of 2022. The report further indicated that work would be initiated on one Area Structure Plan supporting annexation in the second quarter of 2022 and that work would commence annually on an additional three Area

Structure Plans. The preparation and approval of each Area Structure Plan would take approximately two years each to complete.

The various proponents of the new ASPs met to review the proposed workplan and provided Administration with the following input:

1. In the past, Administration had been able to prepare two Area Structure Plans per year.
2. Area Structure Plans took approximately one year to 18 months to complete as opposed to the two-year time frame envisaged by the City Workplan.
3. Some of the ASP requests were for smaller landholdings. Several of the requests for ASPs for these smaller landholdings could be planned by an amendment to existing ASPs.
4. By combining one amendment or requests for new ASPs for the smaller landholdings with one request for a larger ASP during a single year, all requests for new ASPs could be completed within the four year time frame.
5. The landowners in Cells E and F agreed to combine their lands into a single ASP to eliminate the need to prepare a separate ASP for each area. The lands in both Cell E and F are contiguous and share much of the infrastructure. Moreover, Cell E is relatively small, and it was thought that it would be a better use of resources to prepare one ASP, rather than two separate ASPs for each area.

### **What Has Changed**

At the September 20, 2022 Strategic Meeting of Council, Council requested that new ASPs be subjected to more empirical criteria to determine whether there is merit in approving the initiation of a new ASP. Additionally, the City of Calgary and Rocky View County agreed to cooperate on a new revenue and cost sharing model for the Shepard Lands in Rocky View County (now called Prairie Economic Gateway), effectively suspending the City of Calgary's annexation request for these lands and also removing the need for the City to prepare a new Area Structure Plan for these lands. Instead, the City will need to develop a strategic economic development partnership with Rocky View County.

New Noise Exposure Forecast Regulations have created an opportunity to amend two existing ASPs to allow for the development of residential land uses within lands that were previously industrial in nature,

### **Implications of Changes**

Administration decided to delay the sequencing of Area Structure Plans while they determined the new criteria for the development of Growth Management Applications. Additionally, new criteria were developed to determine the sequencing of Area Structure Plans. The Cells E and F Landowners accepted these new criteria and provided Administration with input regarding these criteria as they related to their landholdings.

This has caused a delay of 6 months to develop the sequencing for new Area Structure Plans. It also appears that no new ASPs will be initiated until the first quarter of 2024, a delay of one year from the schedule first reported to IPC in February, 2022.

### **New ASP Workplan**

The new Workplan calls for the development of only one ASP over the next three years. The February 3, 2022 IPC report indicated that 4 ASPs would be developed over a four year timeframe

The rest of the Workplan is for amendments, the development of Joint Planning Areas and the development of a strategic economic partnership with Rocky View County,

There is a heavy emphasis on the development of Industrial Land, with 6 amendments being proposed.

## Implications of New Workplan

While Administration has indicated that new ASPs could be initiated between now and the end of 2026, it is more likely that new ASPs, beyond the one contemplated in the Workplan, will not be initiated until 2027. This means that less land will be available to build housing across the City. This contrasts with the problem identified in Recommendation #2 of the Housing and Affordability Task Force which indicates that: *housing providers say that the biggest barriers to building more supply is access to, and the cost of, land. Maintaining and increasing land for non-market and affordable market housing is a fundamental step in creating housing affordability. The City can incentivize more housing development by changing processes and prioritizing the use of land.*

If the Cell E and F landowners are unable to initiate an ASP until 2027, it is likely that housing will not be able to start in this important sector of the City until 2031. It should be noted that the adjacent landowners in the Keystone ASP to the south of Cell F have stripped and graded their lands to the boundary of the Cell F lands. The lack of an ASP in this area will serve to artificially delay the development of housing in this sector, reducing the supply of land and continuing to drive prices upward. Artificially reducing the availability of land and the cost of time to obtain entitlements for land are the biggest drivers of the price of land for housing.

There seems to be a preponderance of an emphasis on the development of Industrial Lands. While this is an important economic driver for the City of Calgary, it should be balanced with the development of ASPs for housing developments as well.

The Workplan indicates that it is the equivalent of four ASPs, however, it should be noted that the Prairie Economic Gateway requires a different skillset than is usually required for the development of an ASP. At least three of the amendments are relatively simple.

The requirements for Joint Planning Areas have been known since August 15, 2022. The requirements of the CMRB Growth Plan specifically indicate that the Terms of Reference for the development of a Context Study must indicate how ASPs can be approved while the Context Study is being prepared. To date, the Cell E and F landowners have not received a copy of the Terms of Reference for this work, even though the Growth Plan requires that the Terms of Reference should have been prepared by February 15, 2023.

It is unclear why the amendments noted in the Workplan should take precedence over the development of a new ASP in Cells E and F.

It is also unclear as to why this matter is being brought to IPC as a briefing report instead of it being a matter for Council debate and approval.

Thank you very much for considering the above information. We are available at your convenience should you wish to discuss this matter further.

Sincerely

SITUATED 

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cc: All members of Infrastructure and Planning Committee