

PUBLIC SUBMISSION FORM



Please use this form to send your comments relating to an upcoming Council or Committee matter, or to request to speak on an upcoming public hearing item.

In accordance with sections 43 through 45 of [Procedure Bylaw 35M2017](#), the information provided **may be included** in the written record for Council and Council Committee meetings which are publicly available through www.calgary.ca/ph. Comments that are disrespectful or do not contain required information may not be included.

FREEDOM OF INFORMATION AND PROTECTION OF PRIVACY ACT

Personal information provided in submissions relating to matters before Council or Council Committees is collected under the authority of Bylaw 35M2017 and Section 33(c) of the *Freedom of Information and Protection of Privacy (FOIP) Act* of Alberta, and/or the Municipal Government Act (MGA) Section 636, for the purpose of receiving public participation in municipal decision-making and scheduling speakers for Council or Council Committee meetings. **Your name and comments will be made publicly available in the Council agenda.** If you have questions regarding the collection and use of your personal information, please contact City Clerk's Legislative Coordinator at 403-268-5861, or City Clerk's Office, 700 Macleod Trail S.E., P.O. Box 2100, Postal Station 'M' 8007, Calgary, Alberta, T2P 2M5.

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?

PUBLIC SUBMISSION FORM



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

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.



P.O. Box 74059, Strathcona
Calgary, AB, T3H 3B6

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

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 

Situated Consulting



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

cc: All members of Infrastructure and Planning Committee



NEW PROCESS FOR GROWTH APPLICATIONS

Use the Right Assumptions

Calgarians for Sensible Growth

THE ASSUMPTIONS



- City funding is needed
- Circular reasoning
- The full costs can be ignored
- Calgary needs more new communities



Assumption #1 **CITY FUNDING IS NEEDED**

"There will always be situations where new community developers require City funded capital and operating investments."



Assumption #1

**CITY FUNDING IS
NEEDED**

FALSE

Don't interfere with the market



Assumption #2
**CIRCULAR
REASONING**

Shifting most growth from
the suburbs to the
Established Area is not
“feasible from a land
economics or physical
logistics point of view”

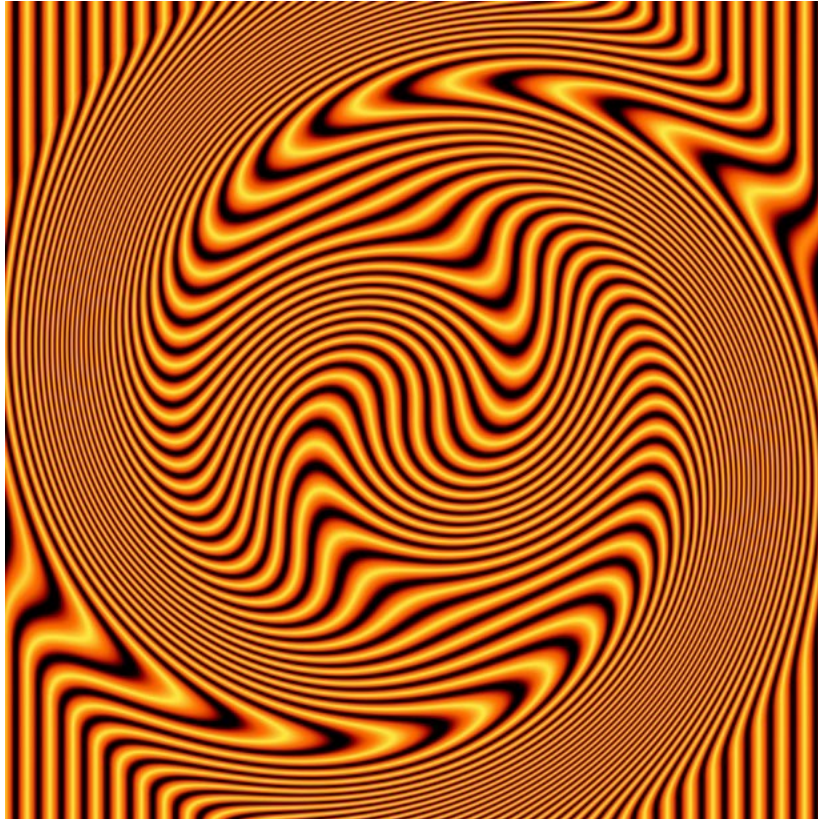
Assumption #2
CIRCULAR REASONING

FALSE

A self-fulfilling prophecy

Years of subsidizing fringe subdivisions have

- Distorted housing economics
- Diverted money needed in the Established Area





Assumption #3

**FULL COSTS CAN
BE IGNORED**

Address climate, resilience,
& other socio-environmental
issues after approval.



Assumption #3

**FULL COSTS CAN
BE IGNORED**

FALSE

Socio-environmental issues have huge financial implications, especially in terms of adaptation & mitigation.



Assumption #4
**CALGARY NEEDS
NEW COMMUNITIES**

Outlying communities like Airdrie, Cochrane, and Okotoks will “steal” people from Calgary if City Council doesn’t approve more subdivisions.

TOO MUCH

Assumption #4

**CALGARY NEEDS
NEW COMMUNITIES**

FALSE

9 – 12 years of serviced
suburban land supply
➔ Target: 3 to 5 years



We drive into the future using
only our rear view mirror

- Marshall McLuhan



IF

you want a new process,
tell the planners to design one
without those assumptions

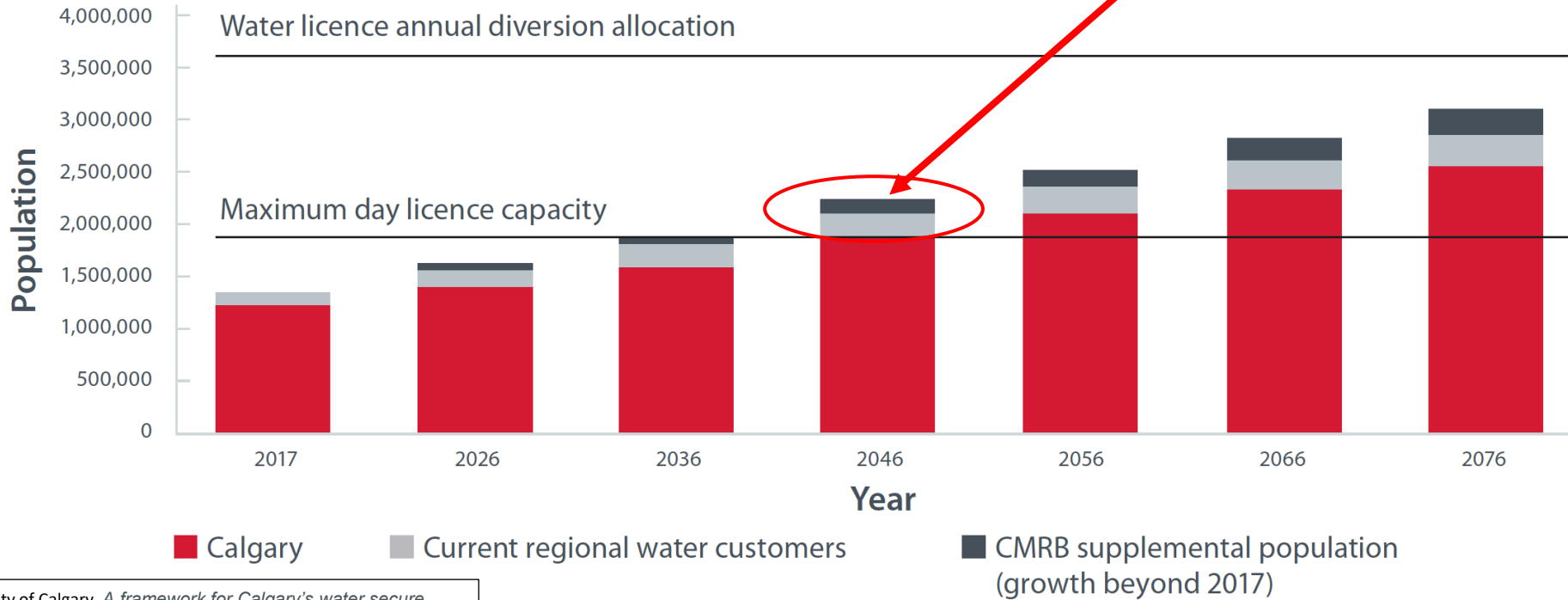


BACKGROUND



Airdrie in 2046

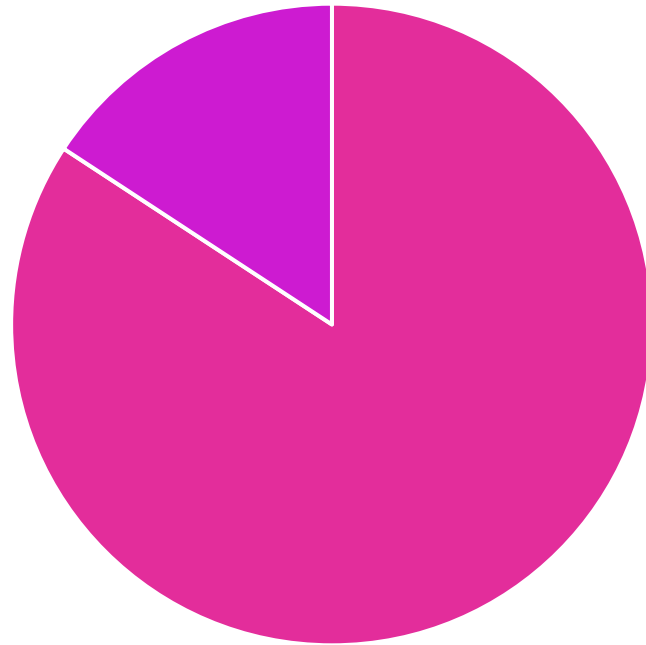
Figure 4. City of Calgary water licence limits



Source: City of Calgary, *A framework for Calgary's water secure future*, 2020, p. 9



Town of Okotoks Water Rights



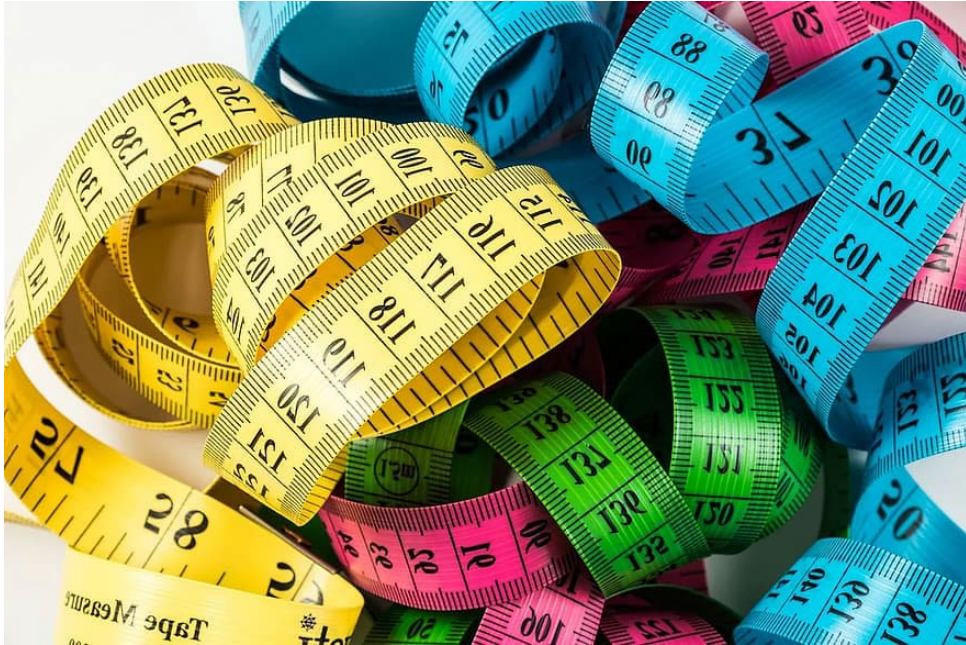
■ Standard Licences ■ Transfers



NEW PROCESS FOR GROWTH APPLICATIONS

Use the Right Thresholds

Calgarians for Sensible Growth



If you can't measure it,
you can't manage it.



CLARITY

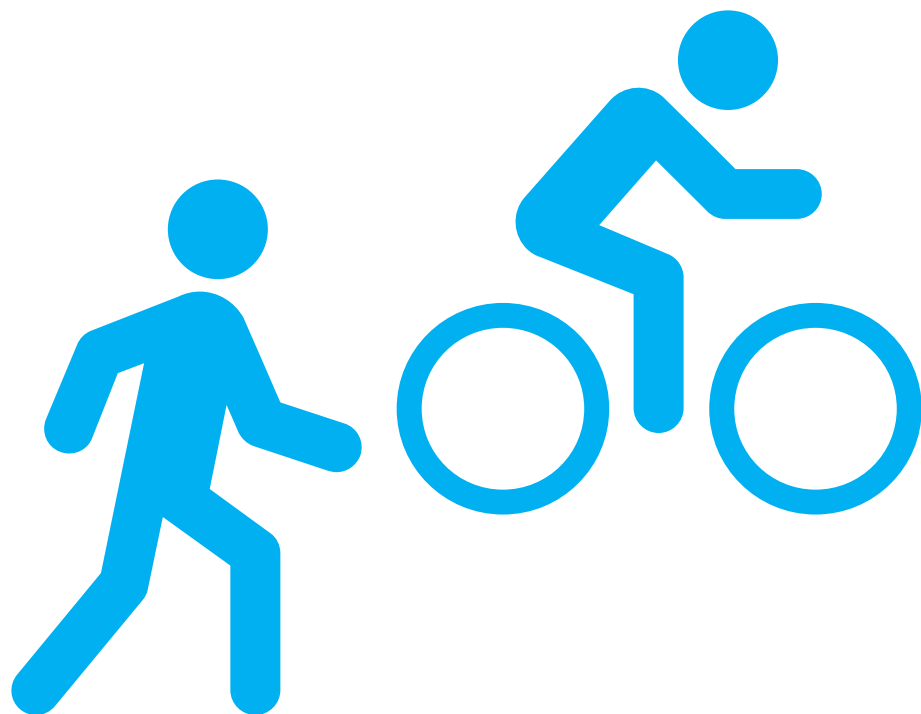
What does The City want?



PASS/FAIL

- Contiguous growth
- Immediately serviceable
- 5A missing links
- New activity centres, main streets, & employment areas

Criteria 1, 2, 5, & 8



DISTANCES THAT ACTIVATE

- Require proximity to activity centres, employment, & public services that allows walking & other active modes.

Criteria 4, 6, & 7



MDP DENSITIES

- Require Activity Centres and Main Streets to meet the densities set out in the *Municipal Development Plan*.

Criterion 5



OPEN & NATURAL

Specify requirements for open space & naturally vegetated lands.

Criterion 9



KEEPING PROMISES

- Set requirements
 - Timelines
 - Acceptable delays
 - Including within applicants control
 - Completion of technical studies
- Set penalties for non-compliance

Criteria 10 - 12



LAND SUPPLY

Only city-wide land supply is relevant

Criteria 13 - 14




PAYBACK

PROPERTY TAXES

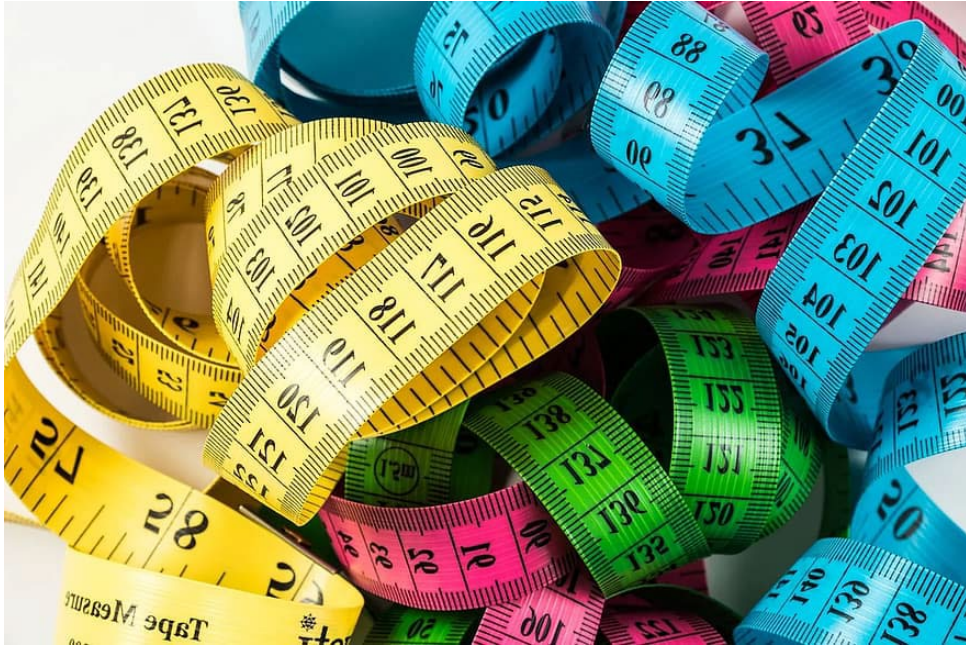
No threshold for cost-
recovery

Criterion 19



WHAT IS SUCCESS?

No thresholds for financial success



If you can't measure it,
you can't improve it.



IF

you want a new process,
tell the planners to create
meaningful, measureable
criteria

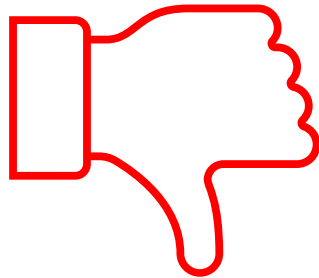
The background features a large, abstract splash of blue and pink ink on a white background. The blue ink is on the left, and the pink ink is on the right, with some overlap in the center. The ink has a fluid, organic appearance with various swirls and textures.

NEW PROCESS FOR GROWTH APPLICATIONS

Ask the Right Question

Calgarians for Sensible Growth

THE WRONG QUESTION



The Planners have done what you asked them to do.

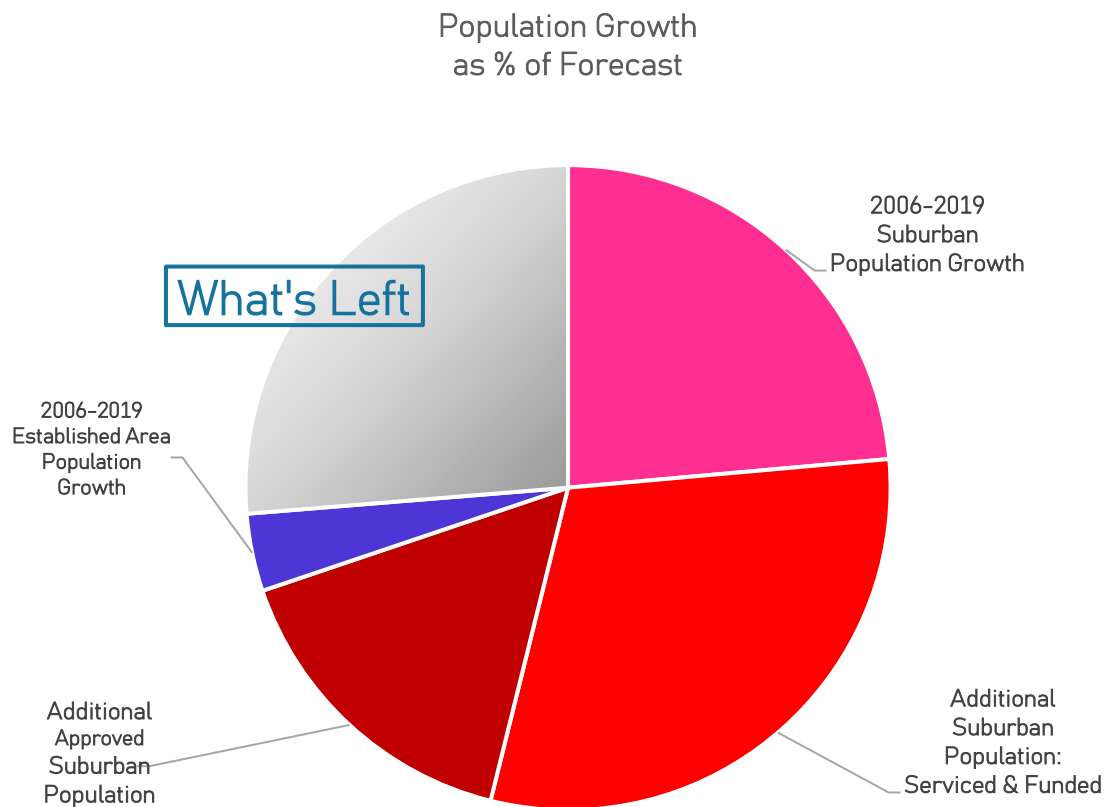
But you've asked the wrong question.

THE RIGHT QUESTION



The right question is:

Does Calgary need more new subdivisions on the fringes?

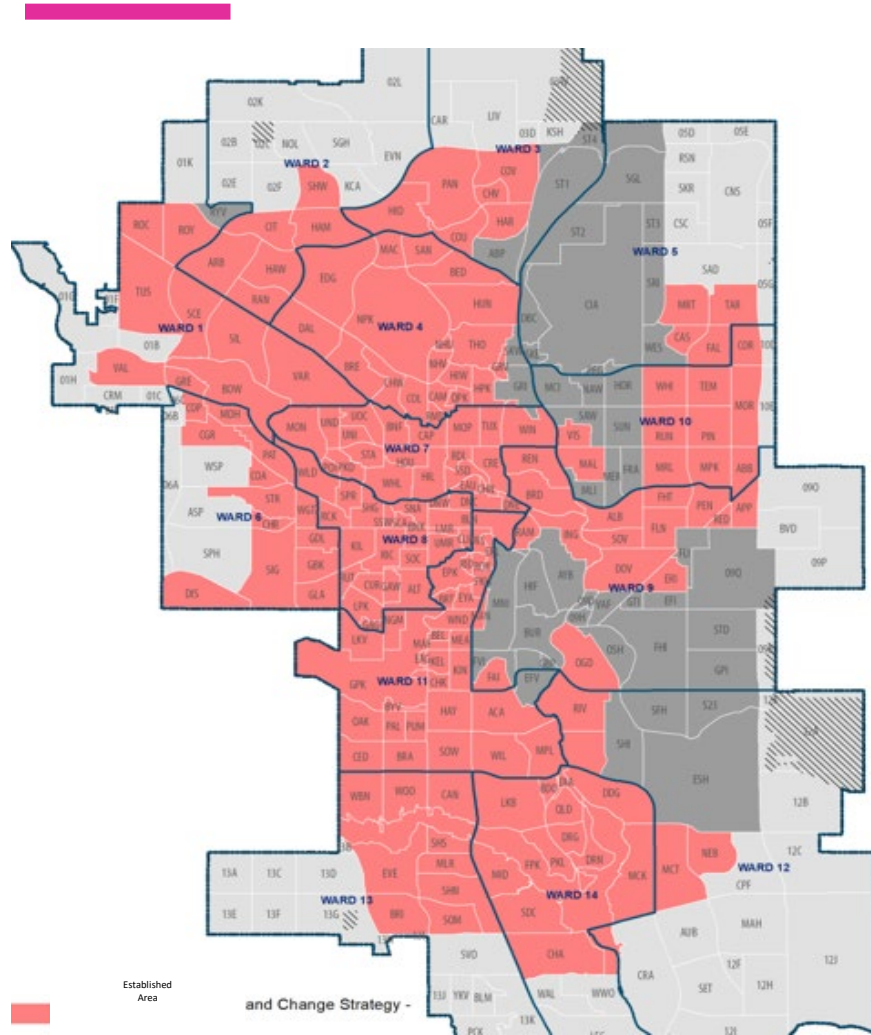


The answer is
NO!

Fringe subdivisions are already approved, serviced, or funded for 70% of future population growth.

Well beyond the *MDP*s 50%.

Source: City of Calgary, [Suburban Residential Growth series](#), 2013-2020



IT'S TIME TO STOP

Declare a moratorium on new subdivisions outside the Established Area.

Put our money back into the communities we already have.

Tell the planners to design a
moratorium that works!

