The Land Supply Strategy is a series of targets, strategies and monitoring directions that functions as both:

- a basis for informing the Growth Management Framework immediately, and
- a plan that will continue to evolve as information becomes available, in order to ensure that the Strategy is focussed on outcomes identified by stakeholders.

Elements of this Strategy should, at an appropriate time, be brought into the Municipal Development Plan through an amendment by Council.

Objectives

The objectives of the Land Supply Strategy originate from the land supply principle approved in LPT2011-055:

"Maintain an optimally balanced land supply in developed and developing areas that ensures capacity for growth, consumer choice and competitive residential markets while also ensuring that The City can provide services to support the development of complete communities."

Which were further defined in the Terms of Reference approved in PUD2012-0422:

"Explore the strategic role of land supply. A Land Supply Strategy must be consistent with the direction envisioned in the MDP. The Land Supply Strategy should consider market forces and ensure an adequate land supply is in place to meet the growth needs of the city (MDP, 5.2.3). As a first priority, it should identify generally how to inform the Prioritizing and Sequencing steps within the Framework for Growth and Change. Further, it should address the role of land supply targets, optimizing the link between planning and servicing decisions (MDP, 5.2.5), and supporting development in strategic locations (MDP, 5.2.4). The Strategy should evaluate where land supply sits relative to various municipal objectives and how land supply strategy is relevant to them."

Therefore, the Land Supply Strategy seeks to provide tools to the Sequencing process in the Framework for Growth and Change, which allow for the MDP Alignment List to be reconsidered to respond to market forces, within the vision of the MDP. Specifically, the Land Supply Strategy aims to:

- Ensure capacity for growth of all types, while acknowledging The City's finite capacity to provide services.
- Enable consumer choice and competitive markets to provide a balanced range of choices for users of all development types.
- Ensure The City can provide services to support the development of complete communities in the quickest ways possible.
- Underscore the importance of monitoring sound data to support land supply decisions, including information on anticipated growth and existing capacity.

Any one of the aims identified above should not be considered to be more important than any other.

The Strategy begins with statements that apply citywide, before dividing into sections according to the development type split used by the MDP Alignment List – Developing Areas, Developed Areas, and Industrial Areas.

Citywide

While the Strategy is structured so that land supply is addressed uniquely for each of the Developed, Developing and Industrial Areas, there are important land supply functions that can be addressed at a citywide scale.

The overarching direction for accommodating growth at a citywide scale comes from the MDP. The City is committed to maintaining a minimum 30-year supply of developable land for all uses [MDP 5.2.2 (b)]. Over the next 50-60 years, the MDP calls for endeavouring to accommodate 50 per cent of population growth within the Developed Area of the city, and 33 per cent by 2039 [MDP 5.2.2 (c) and (d)], while also calling for an adequate supply of land to meet the growth needs of the city, and that supports a healthy, competitive land market. [MDP 5.2.3 (a)]. Part 5 also speaks to prioritizing capital investment for growth [MDP 5.2.5 (b)].

As well, one of the principles of the Framework for Growth and Change (and a direction from Part 5 of the MDP) is better alignment among The City's departments that provide the infrastructure required before occupancy (called "Leading Infrastructure"). Historically, "serviced" has been defined as having City water/storm/sanitary infrastructure in place, however there have been instances where this servicing is available, but development is held up by other factors, meaning the area is not truly "serviced". Emergency Services and transportation capacity should be added to this definition.

Based on this, as well as from feedback from internal and external stakeholders, Administration recommends a land supply strategy that:

- expands the definition of "serviced" to include emergency services and transportation access, in order to make it more functional, and
- allocates servicing capacity to encourage areas under construction to continue to build out and achieve faster completion before allocating investment to new areas, thereby shortening the time to complete communities and improving The City's return on investment.

Analysis should be completed over the next year that:

- attempts to provide certainty to industry by communicating infrastructure investment plans effectively as possible, and
- continues efforts to produce a comprehensive, citywide land supply inventory.
- 1. Determine the practicality of a 10 year supply target of planned to be serviced land citywide, as reflected by growth projects identified for funding in The City's 10-Year Capital Plan. *Planned to be Serviced* is defined as areas that have been identified to receive transportation, emergency services, and water/storm/sanitary servicing within The City's 10-Year Capital Plan.

Rationale

 Identifying lands that are scheduled for infrastructure investment within 10 years serves as an indication of development priority to both Administration and industry, based on Council's

- budgetary authority. The 10-Year Capital Plan categorizes projects that are designated for new growth, providing a basis for this analysis.
- Evaluating the servicing potential of the 10 Year Capital Plan will encourage The City to endeavour to make its budgetary planning as aligned and certain as possible, which is itself a key outcome of the Framework for Growth and Change.

Notes

- This new target is untested, and will require analysis to determine if the 10-Year Capital Plan and associated Infrastructure Investment Plans (IIPs) results in ~10 years of serviced land. Administration believes there is a logical connection between the two, and, regardless of the number of "years of supply" of serviced land, it is valuable to determine the amount of land serviced by the 10-Year Capital Plan.
- The intent is to service significant growth in both the Developing Areas and areas that are likely to intensify in the Developed Areas, as identified by information from the MDP Alignment List
- The 10-Year Capital Plan:
 - Is a mixture of projects categorized as maintenance, upgrade, growth, and service, any
 of which may be funded or unfunded. Analysis will be required to determine which of
 these contribute to Planned to be Serviced land.
 - Is a mixture of funded and unfunded projects, and years 2 to 10 of the Plan are subject to change depending on revenue sources (levies, utility rates, property taxes, and grants). Therefore, the Planned to be Serviced results in an indication of servicing only. Optimally, for land supply, Council would consider adjusting capital planning in response to forecasted growth trends once every two years.
 - Is managed differently among The City's departments. Work will be required to align timelines to represent the most accurate information.
- 2. Serviced land supply should be allocated to Local Area Plan areas where no/low additional City investment would be required to accommodate complete community or neighbourhood build-out in a continuous timeframe.

Rationale

- While other strategies speak to adding more or less land supply, this strategy concerns the allocation of it, reinforcing the notion that building out areas should be accommodated with servicing before proceeding with new areas.
- Building in many areas simultaneously has the potential to require similar infrastructure across multiple areas and spread demand more thinly, which can result in longer timeframes for build-out due to the larger infrastructure burden, and raises the potential for intermittent development if infrastructure provision does not keep up with build out rates.
- For Developing Areas, this strategy endorses servicing areas which are larger than the minimum criteria for a neighbourhood, as described in recently approved Area Structure Plans. This is 55-65 hectares. Development at this scale allows for at least one Neighbourhood Activity Centre, and represents an approximate five minute walk distance. Servicing smaller areas can lead to less efficient investment in required infrastructure.

Notes

 'Capacity' refers to additional capacity that may be allocated beyond what is required by existing development, not the original design of the infrastructure.

3. Industry and Administration will work together to report on and make recommendations for the number of *Active Development Areas (ADAs)* citywide to support a healthy, competitive land market. The appropriate number of *ADAs* will be a function of The City's projected annual unit demand and the number of units that can be built annually in a typical area.

Rationale

- Historically, industry has measured Developing Area competition and choice in terms of the number of developing communities. Administration has measured it in terms of capacity for units and population. Both methods have advantages and disadvantages. Industry and Administration have worked on a new term – Active Development Areas – as a way to represent locations of marketable development.
- ADAs generally represent separate land ownership areas comprising all or a portion of a community. They are serviced (water/storm/sanitary, transportation and emergency services) and therefore face no City-funded infrastructure constraints prior to land use approval.
- The appropriate number of ADAs will be determined based upon a formula that divides the forecasted number of units by a constant unit construction level that reflects the physical development constraints. Industry currently estimates this to be about 250 units for single-family.
- ADAs may be located in either Developed or Developing Areas.
- The relationship between the serviced land supply and the number of ADAs is indicative of:
 - how efficiently the serviced land supply is being converted into marketable development,
 - how ownership is consolidated, and
 - the distribution of available supply, by unit type and by location.
- ADAs will be reviewed on an annual basis. It is understood that any recommended actions
 that arise from this work would be considered as part of The City's budget adjustment
 process.

Notes

- A primarily single-family ADA builds a minimum of 125 units per year. Areas which build between 125 and 400 single-family units will be considered ADAs. Areas which build more than 400 units will be considered 2 ADAs.
- Multi-family ADAs will also be reported. Since the dynamics of the multi-family market are different than that for single-family, more work is required to represent their contribution to competition and consumer choice.
- "Budgeted" ADAs can also be monitored. These ADAs reflect the next areas to develop, requiring no further investment from The City.
- Being a new measure, industry and Administration will work together to refine it through the monitoring function in the Suburban Residential Growth document.
- Following a period of analysis to establish baseline conditions, Administration and industry will work together to determine if a new target is appropriate using the ADA concept.

Developing Areas

Over the past several decades, The City's management of land supply in the Developing Areas has endeavoured to maintain targeted supply for Planned Land with Area Structure Plan (15 Years) and Serviced Land with water/storm/sanitary servicing (3-5 years). Both are embedded in the MDP.

The initiation of the Framework for Growth and Change and the Developer Funded Area Structure Plans (ASPs) has changed the status quo. Within the Developer Funded ASP process is a new "development gate", meaning that ASP approval will no longer indicate short term City infrastructure provision. Instead, these new areas will broaden the choices for the Framework as it makes recommendations for City-funded infrastructure. Based on the removal of the "gate" from the ASP, Developing Area land supply targets should instead focus on distributing the services for the land supply – both for serviced land and land budgeted for servicing.

The strategy for Developing Areas is to have a sufficient amount of serviced land that facilitates growth, but not so much that leads to underutilization of infrastructure. The City should allocate capacity in a way that responds to the market, is financially efficient for The City, and helps to advance the vision of the MDP.

Based on this, as well as from feedback from internal and external stakeholders, Administration recommends a land supply strategy for Developing Areas that:

- establishes targets to ensure serviced land supply is available to Developing Areas that supports the MDP, considers The City's financial capacity, and facilitates the market, by committing to minimum serviced supply levels,
- recognizes that Developing Areas development no longer can occur on all edges at all times, but does recognize that choice must exist, and should align with regional policy, and
- encourages a staggered approach to investing in new Local Area Plan areas to avoid multiple areas requiring similar infrastructure at the same time.
- 4. Target a minimum 2-year and maximum 5-year supply of serviced land in the Developing Areas, where the minimum represents higher than anticipated growth and the maximum representing lower than anticipated growth. Serviced is defined as areas with appropriate transportation, emergency services, and water/storm/sanitary servicing.

Rationale

- Administration will plan servicing decisions for the mid-point of the range (i.e., a 3.5-year supply of serviced land). This is based on forecasted population growth over the immediate five year period.
- Expanding the definition of serviced land more closely reflects infrastructure limitations in Developing Areas, as development can be constrained by any one of the above mentioned services.
- The range of 2-5 years using the expanded definition (water/storm/sanitary/emergency services/transportation) is equivalent to the current MDP target (water/storm/sanitary only) of 3-5 years. Water Resources will continue to plan for 3-5 years of water services-only supply. This target has existed since the approval of the current MDP and has served as enough of a cushion to respond to market movements without restricting supply.

- Expanding the definition to include the two additional infrastructure services (emergency services and transportation) means an additional cost per hectare for The City. Therefore, to achieve this higher level of service within a fixed budget will result in less "serviced" land. The benefit is that land indicated as "serviced" will have all leading infrastructure in place and allow developers to service lots unimpeded. The actual inventory should never fall below 2 years, and Administration will plan for the mid-point of the 2-5 year serviced supply range.
- The range of actual land supply is meant to mirror The City's range of population forecasts. The 2-5 year target provides sufficient land to allow The City to respond to higher than anticipated absorption by servicing more land. In other words, the lower limit represents supply for very high growth, and the upper limit represents very low growth.
- Under the 2013 forecast, 1 year of supply for Developing Areas is 435 hectares of land (for 7,764 units). This indicates the Administration will plan for a serviced land inventory of 1,523 hectares (for 27,174 units).
- The use of a maximum 5 years reinforces that a larger supply of serviced Developing Area land can result in a larger City budget risk of underutilized infrastructure, and the triggering of operating costs across a larger area, as more land is opened up for development. Further, a larger inventory of serviced land supply, with no associated change in demand, will result in slower build out rates across all areas. This is undesirable from a Return on Investment perspective and a complete community perspective, as areas that built out faster will more quickly recoup private and public investments and support local amenities.
- Serviced lands in the Developing Area require a City-initiated or Developer-initiated Area Structure Plan prior to development. Estimates for the timeline to develop serviced land from overlay removal and Outline Plan initiation to first house occupancy vary, but generally fall in the range of around 2.5 years. This target can accommodate that range.

Notes

- Changing the definition of "serviced" means breaking with the past on monitoring. This new
 definition will not enjoy the historical record of data that is available for the current definition.
- 5. Endeavour to maintain a minimum of 2 years of serviced land supply in Developing Areas in each of the south and north halves of the city.

Rationale

- The Framework for Growth and Change aims to encourage development in the most efficient ways, but Administration acknowledges the need to facilitate spatial choice. While sectoral minimums can trigger multiple, simultaneous infrastructure investments, and/or annexation, a practice of maintaining a minimum amount of supply to the north and south preserves spatial choice, acknowledges a well-known balance in Calgary's residential development market, and respects the growth corridors identified by regional planning documents.
- The 2 to 5-year target (#4) is the primary target for serviced land. This target provides clarity for industry on servicing distribution and sectoral choice by endeavouring to maintain serviced land in 2 Developing Area sectors in each half (4 in total).
- Servicing of land tends to be initiated in large area amounts, because of catchment and service area delineations. As a result, supply levels in smaller geographies such as halves and sectors are subject to wider variations than the citywide level. This target maintains spatial choice while giving The City flexibility in scheduling.

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Notes

- This target may result in moving ahead with less efficient servicing arrangements in order to preserve spatial choice.
- The definition for "South" and "North" is currently: **South** West, South and Southeast planning sectors, and **North** Northwest, North, Northeast, and East planning sectors.
- The proportion of development to the halves will float with market forces; the target will be set based on the five year forecast established in *Suburban Residential Growth*.
- The target refers to 2 years of supply based on the growth of the particular half of the city, not the entire city. The 2 year supply in each half will be maintained by committing to meet the target with new servicing within two years of a servicing investment in the opposite half.
- Under the current forecast, 1 year of supply is 157 hectares for the North (40% of expected demand) and 278 hectares for the South (60%). This indicates the Administration will, presently, plan for a minimum serviced land inventory of 314 hectares for the North sectors, and 556 hectares for the South Sectors.
- The sum of these two is 870 hectares, which is acknowledged to be below the respective citywide target of 1,523 hectares in Target #1. The City will recommend additional servicing decisions based on the order of projects in the Sequenced List, taking into consideration the balance of supply in the two halves.
- 6. Stagger the initiation of infrastructure investment programs in new Local Area Plan areas in the Developing Areas.

Rationale

 Financial models show The City encounters difficulty when many new areas are initiated at once, leading a number of areas requiring similar servicing at similar horizons. This results in uneven annual budgeting. Effort to stagger initiation will result in a smoother 'cash flow' process for The City.

Notes

This strategy may be refined to a target as part of the Strategy's evaluation process, if there
is a quantitative mechanism that could support this without causing unintended
consequences.

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Industrial Areas

While The City has been monitoring and reporting on available land supply for Industrial Areas for many years, The City has not introduced a target. Through the development of the Strategy, stakeholders from Industrial Areas have identified land supply as a concern, although in different ways than how it has been contemplated for other areas. Administration will continue work to define these concerns, and identify The City's role in addressing them.

Further, the Growth Management Framework intends to allocate time to reconsider how the Prioritizing and Sequencing process is applied to Industrial Areas. The impact of this on land supply management for Industrial Areas will be evaluated

The strategy for Industrial Areas is to have a sufficient amount of serviced land that facilitates growth, but not so much that leads to underutilization of infrastructure. This needs to consider the impact of serviced land supply in the attracting business investment to Calgary. The City should allocate capacity in a way that is responds to the market, is financially efficient for The City, and helps to advance the vision of the MDP.

Based on this, as well as from feedback from internal and external stakeholders, Administration recommends a land supply strategy for Industrial Areas that:

 establishes a target to ensure serviced land supply is available to Industrial Areas that supports the MDP, considers The City's financial capacity, and facilitates the market, by committing to serviced supply level range.

Analysis should be completed over the next year that evaluates:

- whether a geographical split of the serviced land supply target is possible or desirable,
- whether sub-types of Industrial development should be separately targeted (i.e., employment intensive industrial, unserviced industrial) based on the MDP, and
- the impact on land supply of any reconsideration of the Prioritization and Sequencing process for Industrial Areas.
- 7. Maintain a minimum 3 year and maximum 5 year target for serviced land in the Industrial Areas. *Serviced* is defined as areas with appropriate transportation, emergency services, and water/storm/sanitary servicing.

Rationale

- For the first time, a servicing target is introduced for Industrial Areas. This is done to represent the sector's importance to Calgary's economy, and land supply's importance to Industrial development.
- Serviced lands in Industrial Areas require an Area Structure Plan prior to development. Administration will engage Industrial experts to ensure the timeline between approval of ASP and first tenant/owner occupancy is accommodated within the range. There are reasons why a larger supply in years may be supported, including lower overall amount of land per year of supply, and the economic importance of the Industrial sector.

Notes

Stakeholder engagement and research may refine this recommendation over time.

Developed Areas

The Developed Areas represent a new consideration for The City's land supply management. There are two reasons for this – one, until recently the size of the market and the assumption of infrastructure capacity did not warrant close scrutiny of supply, and two, a definition of 'supply' in Developed Areas is relatively elusive, given that it comments on the capacity of land which is already built up. Increases in development activity, questions about infrastructure capacity and direction from the MDP have made understanding Developed Areas land supply a priority.

Planned land supply (land with an approved Local Area Plan) in the Developed Areas has been found to be high. Recent planning efforts which encourage redevelopment and intensification have been completed for many locations in the Developed Areas, and many of these are only beginning to build out. Further, preliminary analysis of available capacity under current land use designations also shows a large amount of unused planning capacity.

The one check on this is the serviced land supply in Developed Areas, for which a comprehensive inventory is not yet available. Today, serviced capacity is evaluated on a case-by-case basis, and most required upgrades are the financial responsibility of the applicant. Administration is beginning to explore ways to identify the status of infrastructure earlier in the process, and smooth out the planning and funding of required infrastructure in order to avoid arresting development in priority locations.

The status of land supply in Developed Areas remains one of a healthy supply of planned land relative to absorption, and an unknown supply of serviced land. More work on understanding both of these as it relates to targets is recommended.

The strategy for Developed Areas is to encourage redevelopment by determining servicing required to continue growth. The City should continue to work with stakeholders to determine the best way(s) to fund required infrastructure in the Developed Areas.

Based on this, as well as from feedback from internal and external stakeholders, Administration recommends further analysis for Developed Areas that:

- works to develop a minimum planned land supply target for the Developed Areas, to ensure planning remains a priority mechanism for encouraging redevelopment and MDP implementation.
- works to develop a maximum number of Transit Oriented Developments (TODs) that The City will invest and the market will support, in order to provide TODs the best chance of developing into complete communities in a shorter period of time,
- evaluates whether further splits within Developed Areas are possible or desirable, and
- continues to determine the most accurate monitoring methods to represent capacity in the Developed Areas.
- 8. Develop a minimum planned land supply target and serviced land supply target in the Developed Areas. *Planned* is defined as areas with a Local Area Plan approved or significantly amended since the implementation of the Municipal Development Plan, and *Serviced* is defined as areas with appropriate transportation, emergency services, and water/storm/sanitary servicing.

Rationale

- Targets for the Developed Areas are encouraged in order to recognize the importance and expected rising share of growth for redevelopment and MDP implementation. However, further collection and analysis of data is required before targets can be recommended.
- The target should be set high enough to ensure there is ample supply to support redevelopment, while not being so high that supply cannot be matched to priority areas.
- Absorption in the Developed Areas is also less predictable (both across locations and over time) so a robust supply is reasonable to facilitate this market.

Notes

- A "minimum 15 to 20 year planned land supply" is being contemplated, to ensure ample supply to support redevelopment, while not being so high that supply cannot be matched to priority areas, or that results in underused infrastructure.
- 9. Develop a target for a number of actively developing Transit Oriented Development locations in the Developed Areas that The City will support with infrastructure investment.

Rationale

- Transit Oriented Development (TOD) is a relatively new concept for Calgary. The foundation of these developments is high quality transit service, coupled with nearby, walkable amenities. Both high quality transit and a walkable area rich with amenities require a concentration of population. Having a large number of TOD locations developing simultaneously reduces the amount of market share available to each (especially for an emerging market) thereby reducing the ability to build out quickly and support the transit and other amenities necessary for a successful TOD.
- The City should maintain a role that reflects the market at any given time, leading to less involvement as the market grows and matures.

Notes

"Up to four actively developing TODs" is being contemplated as a target. The locations should be spread out equitably among both lines of the LRT. Some market analysis work has been completed on this topic to support a target of four. There are approximately four TODs currently under construction, with other activity in various stages of the planning process.

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Monitoring Program

The City has a history of monitoring Developing Area land supply (Suburban Residential Growth) and Industrial land supply (Employment Areas Growth & Change). The practice of monitoring Developed Areas land supply is emerging as part of the Developed Areas Growth & Change document.

Based on this, as well as from feedback from internal and external stakeholders, Administration recommends that the monitoring component of the land supply strategy:

- recognize the value of accurate, timely land supply data,
- recognize that The City's land supply management practices influence the implementation of the MDP, the imagineCalgary vision, and the 2020 Sustainability Direction, and that the Strategy should be evaluated in part based on the results of the metrics in these plans,
- recognize that land supply management impacts The City's financial position, and therefore the Strategy should be monitored with this in mind,
- recognize the need to maintain a dialogue between industry, government, and market/economic development organizations to collectively try to understand general market information.

Analysis should be completed over the next year that:

- initiates the market intelligence group,
- monitors the targets recommended in this Strategy, and
- continues to develop sound monitoring practices for Developed Areas, and maintains sound monitoring practices for Developing and Industrial Areas.
- 10. Monitor residential and industrial land market activity and land market related data that may impact land supply by initiating a market intelligence group with City and industry representatives. Monitoring should include, but not be limited to, the following topics:
 - a. Land Prices
 - b. Housing Affordability
 - c. Income Levels
 - d. Interest Rates, Unemployment and other economic indicators
 - e. Vacancy Rates
 - f. Regional Markets
 - g. Identify major barriers to development

Rationale

- A market intelligence group, including representation from industry, government, and market/economic development organizations, can support dialogue on contentious issues related to land supply.
- Land prices and rents, ability to pay, interest rate environment, unemployment, and vacancy rates are measures often used in the debate over more or less land supply. As there are no perfect causal relationships between land supply and these data, and external impacts on these data are common, these measures should be used in the consideration (but not necessarily the determination) of land supply levels.

- Calgary operates in a regional system, and has historically attracted a high share of both greenfield residential and greenfield industrial markets. As the city grows, it is typical for a rising share of growth to occur in regional municipalities. The City needs to identify key markets that are critical to maintaining its attractiveness as a destination, its economic growth, and its tax base.
- There is a cost/benefit with pursuing markets within the regional context. Benefits include greater economic growth and greater tax revenue, but costs include new capital and operating expenses. There is also the potential for development to be unaligned with the Municipal Development Plan.
- The Calgary Metropolitan Plan and the three Intermunicipal Development Plans identify growth corridors and areas for Calgary and surrounding municipalities. This direction is an evolution from the notion that Calgary can growth on all sides simultaneously, and reinforces a system where growth and growth-related infrastructure are regional matters, best discussed with a cooperative perspective.

11. Monitor topics that are related to The City's management of the land supply, including, but not limited to:

- a. The impact of approving Local Area Plans on the growth targets in MDP 5.2.2.
- b. A record of the unfunded capital infrastructure liability, and unrealized revenue streams, associated with approved Local Area Plans.
- c. Research the role of land supply in the preservation of historical resources (as defined by the Historical Resources Act), with the goal of ensuring that the retention of a resource does not reduce site developability.
- d. The impact of approving Local Area Plans on the city's watersheds, riparian areas, and environmentally sensitive areas.

Rationale for (a)

■ The MDP has a vision for location of growth over the next sixty years — a 50/50 balance between Developed and Developing areas. Therefore, all proposed Local Area Plans should be monitored for how the additional supply provided by the Plan impacts the current balance of land supply, and impacts the ability to reach the MDP target.

Rationale for (b)

When a Local Area Plan is approved, the process begins to coordinate funding for the area's required infrastructure. Keeping a record of this unfunded capital and unrealized revenue will serve as an indicator of how much money is required to realize the visions captured in The City's planned land supply.

Rationale for (c)

It has been suggested that The City should ensure that redevelopment that impacts a historical resource should not reduce the developability of a site, with the goal being to retain these resources while not compromising available development options.

Rationale for (d)

All future growth impacts environmental stewardship, whether it is on protecting the city's
watersheds and riparian areas, or preserving environmentally sensitive areas. This should
be considered in land supply decisions, in coordination with The City's existing
environmental policies.