



December 1, 2014

Rocky View County
911 32 Ave NE
Calgary, Alberta
T2E 6X6

Dear Rocky View Councillors,

Re: County Plan Report – Policy and Priorities Committee

The County Plan mandates within itself that annual assessments of its progress must be completed. We are grateful that the Council has been willing to encourage a robust review of the results over this first year.

The review allows for appropriate adjustments and amendments to be made to improve our path towards the vision set out by the Rocky View County Plan:

“Rocky View is an inviting, thriving, and sustainable county that balances agriculture with diverse residential, recreational, and business opportunities.”

Rocky View County is fortunate to have a broad range of both resident and external investment interest. People who are willing to risk assets and capital to develop and build in Rocky View. Of course, like in any jurisdiction, whatever is proposed and eventually approved must meet or exceed the requirements of Rocky View. We submit there is a natural alignment towards the vision for those looking to invest and develop in Rocky View. An inviting, thriving and sustainable County creates value for everyone.

To achieve the common vision of the County Plan, proposals could be assessed against a set of criteria. Those which score highly on this assessment grid should be the ones that will take us most effectively toward accomplishing the vision.

To block or restrict these high-scoring proposals from being considered on their merit, undermines progress towards the vision. We submit that rather than using heavy prejudicial discounting to block proposals, it is better to allow for the best proposals to move us towards realizing the vision to the fullest extent.

The County Plan, in its current form, focuses on limiting growth and, further, takes a prescriptive approach that directs the type and location where that growth will occur. This focus and the culture it creates has contributed to the low 1.5% regional growth to the third quarter of this year; half of the “modest” target set in the Plan (attachment 4). A summary of some excerpts from the County Plan is found listed on attachment 2.

This emphasis on restricting, limiting and directing the type and location has influenced the implementation of the policies and procedures at the County. The County’s Priority Policy chart (attachment 3) is used for the prioritization of area structure plans, and (in practice) any other type of development proposed. This chart/grid is clear. If a proposal does not conform to the designated “nodes” and is for residential versus commercial development then it is heavily discounted by 55 points. If the proposal contributed greatly and scored highest on every other valid criteria it would still get a failing grade of 45 out of 100 possible points.

This approach, sanctioned by continual reference to the County Plan, effectively blocks proposals from consideration, no matter how well they may contribute to the vision.

The County Plan states that Council plays a key role in how implementation of the County Plan will be managed. It states:

“....Council plays a key role in implementing the Plan by setting priorities, providing work direction to administration, and approving actions. Based on the actions summarized below, administration will prepare annual work programs, proposed budgets, progress reports, and other materials for Council review and approval.” (pg107).

Therefore we respectfully submit to Council that amendments be made to the County Plan and implementation policies be modified to allow for full consideration of proposals against the remaining set of values and criteria in the County Plan that truly serve to take us towards the agreed-upon vision.

The intent of these amendments are to provide a context by which development applications across the county can be considered without the inferred bias.

The current language implies that development, particularly residential development is not welcome in the county. Language in the County Plan such as “should not...unless” or “should only” work against the vision. This type of language implies that conclusions are drawn by Administration prior to any evaluation of an application. Effectively, these conclusions all but eliminates the opportunity for Council to make impartial and dispassionate decisions, and instead leaves these decisions and the evaluation process to a small circle within the County Administration. That essentially cuts out our elected officials on decisions that are critical to the County’s future. That isn’t right.

Any and all applications deserve and in fact, under the Municipal Government Act (MGA), require, a full and impartial circulation and review of the application, under the policies of the County Plan and/or other county policies, with a rationale to be provided as to their merits or faults, without prejudice.

Again we reminded Council that the Reeves Task Force majority opinion was opposed to the “drawing of lines” to determine where development “should or should not occur”. The implication is development should be based on the merits it brings to the County.

The County Plan clearly sets out the criteria by which applications will be measured (Sections 5.4, 5.5, 5.7, 5.9, 10.6) but the preceding language in each of these sections derails any application before the case can be made on its merits.

We therefore respectfully request that Council consider making the suggested amendments to the County Plan (see attachment 1) and adjustments to the implementation procedures that allow for full and fair consideration of any proposal that comes to the County.

Yours truly,

A handwritten signature in blue ink, appearing to read "Eric Lowther". The signature is stylized with a large initial "E" and a long, sweeping underline.

Eric Lowther

Executive Director – Rocky View 2020

Attachments 1,2,3,4.

cc: Mr. Kevin Greig - County Manger

cc: Mr. Richard Barss – Senior Planner

Attachment 1 – Amendments

AMENDMENT #1 REGARDING NEW HAMLETS (Pg 16 of 105)

5.4 New hamlet development should ~~not~~ be considered ~~if unless (i) existing overall hamlet residential potential is not being significantly developed, and (ii)~~ a need and rationale for a new hamlet ~~has been~~ can be demonstrated based on the following criteria:

- ~~a. consistency with the County's residential population goals;~~
- b. is an appropriately located development within the existing settlement pattern;
- c. opportunity for community input;
- d. meeting the financial, environmental, community infrastructure goals of this Plan; and
- e. market demand.

AMENDMENT #2 REGARDING NEW HAMLETS (Pg 16 of 105)

5.5. In order to retain rural character and a sense of community, consideration should be given to the ultimate size of a hamlet. To retain these qualities, ~~the County considers the upper population limit of a hamlet community to be in the range of 5,000 – 10,000 residents.~~ Hamlet size shall be determined based on the following criteria:

- ~~a. County residential population goals;~~
- b. existing hamlet population goals;
- c. community input;
- d. local commercial service requirements;
- e. fiscal impact;
- f. infrastructure capacity; and
- g. retaining rural character
- h. ability to support or amend local community and/or regional amenities

AMENDMENT #3 REGARDING NEW HAMLETS (Pg 16 of 105)

5.7. Expansion of a hamlet boundary for residential purposes should ~~only be considered when hamlet development is close to meeting residential capacity.~~ Proposals shall be evaluated on the following criteria:

- ~~a. County residential population goals;~~
- b. hamlet population goals;
- c. community input;
- d. the proposed development represents orderly, appropriately sequenced development;
- e. benefit to the community;
- f. compatibility and integration with the existing area structure plan or conceptual scheme;
- g. fiscal impact and infrastructure capacity;
- h. local commercial service requirements; and
- i. market demand.

AMENDMENT #4 REGARDING NEW HAMLETS (Pg 37 of 105)

~~9.5. In order to retain their rural character, hamlets are not encouraged to grow beyond a population range of 5,000 – 10,000 residents.~~

AMENDMENT #5 REGARDING NEW COUNTRY RESIDENTIAL AREAS (Pg 17 of 105)

5.9. New country residential area structure plans or conceptual schemes should ~~not~~ be considered ~~if unless (i) existing overall country residential areas are not being~~

~~significantly developed, and (ii)~~ a need and rationale ~~has been~~ can be 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.

AMENDMENT #6 REGARDING NEW COUNTRY RESIDENTIAL AREAS

10.6 Where a new country residential area structure plan is ~~needed~~ considered the plan should:

- a. ensure development supports rural character, is well designed, and conforms to current technical servicing requirements and master servicing plans and policies;
- b. propose alternative residential development forms, such as compact residential development, to reduce the development footprint on the rural landscape;
- c. provide for well-designed public gathering places such as parks, open spaces, and community facilities. Gathering places should:
 - i. be safe, accessible, and attractive;
 - ii. be centrally located;
 - iii. respect and enhance community identity and character;
 - iv. encourage social interaction; and
 - v. address the needs of residents of all ages and abilities.
- d. ensure development retains the area's natural features and that buildings are situated to create minimal visual impact on adjoining properties;
- e. provide patterns of development and transportation networks that create linkages between subordinate plans; and
- f. address the following matters:
 - i. future land use concept, population at build-out, and the phasing of development;
 - ii. form, quality, design, and compatibility with existing development;
 - iii. impact on municipal servicing costs and proximity of development to existing road and servicing infrastructure;
 - iv. fiscal impact analysis;
 - v. efficient internal road network;
 - vi. need for institutional uses, open space, recreational areas, amenities, and pedestrian connections;
 - vii. impact on the environment;
 - viii. designing with the landscape;
 - ix. interface design with adjacent agriculture land; and
 - x. other policies of this Plan

AMENDMENT #7 AREA STRUCTURE PLAN AMENDMENTS (Pg 89 of 105)

Remove reference from Sidebar and create new policy as follows:

28.5 A **major amendment** to an area structure plan may be initiated by a development application. In determining whether the application requires a major amendment, the County will consider the following:

- a. existing area structure plan policies including land use, density, and/or form;
- b. a proposed scale and scope change resulting in significant impact beyond the subject lands;
- c. potential to result in similar applications on surrounding lands;
- d. potential need for new or expanded infrastructure.

28.6 A **minor amendment** to an area structure plan is initiated by a development application and in the opinion of the County is:

- a. consistent with the overall intent of the area structure plan and the policies of this plan; and
- b. is minor in nature and may include specific policy or map amendments

Attachment 2 - Sample quotes from County Plan.

- “Rocky View County will **direct** new growth to designated development areas”
- “identifying the **preferred areas for residential growth** for the next 10 to 12 years”
- “ **direct the majority of residential growth** to those areas identified on map one”
- item 5.12 “**direct new multi-lot residential development** to the towns of Crossfield and Irricana and the village of By Sicker”
- 513 “**direct high density forms** of residential development to adjacent urban municipalities”
- 6.1 “**direct new development** areas of existing infrastructure”
- Key Directions...“ **Direct** new multi-lot residential development to existing area structure plan areas, as described in the County Plan.”
- “the County considers the upper population **limit** of a hamlet community to be in the range of 5,000 - 10,000 residents.”
- “Hamlet size shall be determined based on the following criteria:
 - **County residential population goals;**”
- “Commercial development is **limited** to business areas as described in the County Plan.
- “**No more than 3 %** of the regional population over the life of the Plan”
- “...consistency with **the County’s residential population goals;**
- “b. **is an appropriately located development** within the existing settlement pattern;”
- New hamlet development **should not be considered** unless

Attachment 3

COUNCIL POLICY #322 Title: Area Structure Plan Priority Policy

<p align="center">Criteria</p> <p>*When evaluating a proposal the County will consider the vision, principles, goals and policy of the County Plan.</p>	<p align="center">Maximum Points (total 100)</p>	<p align="center">Considerations</p>
<p>Location</p> <p>Is the proposal located in one of the development areas identified in the County Plan?</p> <p>County Plan</p> <ul style="list-style-type: none"> • Principle 1 – Growth and Fiscal Sustainability • Section 5 - Managing Residential Growth • Section 14 - Business Development • Map 1 - Managing Growth 	<p align="center">35</p>	<p>Proposals within identified <i>area structure plan</i> boundaries or identified business areas will score higher</p>
<p>Fiscal</p> <p>Does the proposal support the County's fiscal goal of increasing the non-residential assessment base?</p> <p>Has the proponent demonstrate a market demand for the commercial/industrial development they are proposing?</p> <p>County Plan</p> <ul style="list-style-type: none"> • Principle 1 – Growth and Fiscal Sustainability • Section 6 – Financial Sustainability • Section 14 - Business Development 	<p align="center">20</p>	<p>Feasible commercial and industrial development will score higher</p>

<p align="center">Criteria</p> <p><i>*When evaluating a proposal the County will consider the vision, principles, goals and policy of the County Plan.</i></p>	<p align="center">Maximum Points (total 100)</p>	<p align="center">Considerations</p>
<p>Design</p> <p>Is the proposed design of the residential or business development consistent with the design goals for rural communities? County Plan</p> <ul style="list-style-type: none"> • Principle 4 - Rural Communities • Section 9 - Hamlets • Section 10 – Country Residential Development • Section 11 – Institutional and community land use • Section 12 - Parks, open space, pathways, and trails • Section 14 - Business Development 	<p align="center">10</p>	<p>Proposals that address the country residential, hamlet and business design objectives will score higher</p>
<p>Servicing</p> <p>Is the proposed method of water servicing feasible?</p>	<p align="center">10</p>	<p>Water solutions in order of preference</p> <ol style="list-style-type: none"> 1. Locate within an existing serviced area 2. Extend services from an existing regional private or municipal system 3. Build a regional system
<p>Servicing</p> <p>Is the proposed method of wastewater servicing feasible?</p>	<p align="center">10</p>	<p>Wastewater solutions in order of preference</p> <ol style="list-style-type: none"> 1. Locate within an existing municipal service area 2. Extend services from an existing municipal system <p align="center">OR</p> <ol style="list-style-type: none"> 1. Tie into an existing private system 2. Build a regional system 3. Build a decentralized system (on site disposal)

<p align="center">Criteria</p> <p>*When evaluating a proposal the County will consider the vision, principles, goals and policy of the County Plan.</p>	<p align="center">Maximum Points (total 100)</p>	<p align="center">Considerations</p>
<p>Servicing</p> <p>Will stormwater be managed in a comprehensive manner?</p>	<p align="center">10</p>	<p>Stormwater management in order of preference</p> <ol style="list-style-type: none"> 1. Locate within an existing service area where a master drainage plan exists, conveyance systems are identified and accessible, storage areas exist, and a levy system is in place 2. Provide a feasible regional system with outlets and conveyance systems are identified.
<p>External Change</p> <p>Have other external plans affected the proposed area?</p> <p>e.g. Other municipal plans, regional provincial plans, or annexations</p>	<p align="center">5</p>	<p>Changes to the planning context will score more points</p>

Attachment 4

CALGARY REGION RESIDENTIAL HOUSING PERMITS						
Municipality	2009	2010	2011	2012	2013	Q3 2014
Airdire	816	993	1,070	1,520	1,772	1,063
Banff	1	1	4	8	2	8
Black Diamond	18	22	17	13	13	13
Calgary	5,078	7,054	9,812	9,583	13,712	9,439
Canmore	19	28	34	15	154	104
Chestermere	143	163	128	325	401	342
Cochrane	386	422	357	544	781	712
High River	111	94	85	80	110	69
Irricana	0	1	1	0	0	0
Nanton	2	3	1	4	1	1
Okotoks	39	307	227	235	215	152
Redwood Meadows	0	0	0	0	0	0
Strathmore	156	138	104	87	78	65
Turner Valley	19	9	8	19	21	41
MD of Foothills	128	169	116	154	136	195
Rocky View County	228	285	207	313	252	192
Wheatland County	69	48	52	30	27	62
TOTALS	7,213	9,737	12,223	12,930	17,675	12,458
Rocky View County Proportional Share	3.2%	2.9%	1.7%	2.4%	1.4%	1.5%