Growth Plan Update Task Force

Agenda

Monday, May 16, 2016
1:00 p.m. – 5:30 p.m.
La Cite Francophone – Hall Jean-Louis Dentinger
8627 rue-Marie-Gaboury (91 Street), Edmonton

Meeting Objective:
To obtain feedback and direction on the outstanding areas of Policy included in Draft 1.0 and the draft implementation Plan to inform Draft 2.0 of the 2016 Growth Plan.

Agenda Items

1. Call to Order – Mayor Roxanne Carr, Chair
2. Chair Opening Remarks
3. Approval of Agenda – Mayor Roxanne Carr, Chair
4. Approval of Minutes of April 13, 2016 – Mayor Roxanne Carr, Chair
5. Debrief: External Stakeholder Consultation – Hassan Shaeen (verbal)

   Recommended Motion: That the Growth Plan Update Task Force accept the report on the External Stakeholder Consultation as input to inform Draft 2.0 of the Growth Plan.

6. Debrief: Feedback from Municipalities on Draft 1.0 – Sharon Shuya

   Recommended Motion: That the Growth Plan Update Task Force accept the feedback submitted by member municipalities as input to inform Draft 2.0 of the Growth Plan.
7. **Outstanding Policy Areas Discussion - Chapter 4** – *Melaine Hare/ Barry Huybens*

   a. Greenfield Density Targets  
   b. Rural Growth  
   c. Metropolitan Structure

   **Recommended Motion:** That the Growth Plan Update Task Force endorse the direction of the policies for the Greenfield Density Targets, Rural Growth and Metropolitan Structure to inform Draft 2.0 of the Growth Plan.

8. **Coffee Break**

9. **Implementation Plan - Chapter 5** – *Melaine Hare/ Barry Huybens*

   a. Transition Plan  
   b. Implementation Tools  
   c. Roles & Responsibilities

   **Recommended Motion:** That the Growth Plan Update Task Force endorse the draft Implementation Plan to inform Draft 2.0 of the Growth Plan.

10. **Next Steps** – *Sharon Shuya*

    a. Meeting Schedule  
    b. Draft 2.0

11. **Adjournment**

    **Next Meeting Date:**  
    *June 29, 2016*  
    La Cite Francophone – Hall Jean-Louis Dentinger  
    8627 rue-Marie-Gaboury (91 Street), Edmonton  
    8:30 a.m. – 4:00 p.m.
Growth Plan Update Task Force

Wednesday, April 13, 2016
8:30 a.m. – 4:00 p.m.
La Cite Francophone – Hall Jean-Louis Dentinger
8627 rue Marie-Anne-Gaboury (91 Street), Edmonton

Members:
Roxanne Carr, Strathcona County (Chair)
Lisa Holmes, Town of Morinville (Vice Chair)
Don Iveson, City of Edmonton
Gale Katchur, City of Fort Saskatchewan
Nolan Crouse, City of St. Albert (alternate)
John Schonewille, Leduc County
Ralph van Assen, Village of Warburg

Provincial Liaison:
Victoria Brown
Joe Petrie

Regional Technical Advisors:
David Hales
Greg Hofmann
Clayton Kittlitz
Peter Vana

Strategic Advisor:
Barry Huybens

Regrets:
Peter Ohm

Consultants:
Melanie Hare, Urban Strategies
Hassan Shaheen, ISL Engineering & Land Services

CRB Staff:
Malcolm Bruce, CEO
Neal Sarnecki, Project Manager
Sharon Shuya, Project Manager
Stephanie Chai, Project Manager
Loreen Lennon, Communications Manager
Leslie Chivers, Operations Manager
Brandt Denham, GIS Coordinator
Amanda Borman, Executive Assistant
Lisa Saskiw, Administrative Assistant

Guests:
Grant Bain, Leduc County
Camille Berube, Town of Beaumont
Teaka Broughm, City of St. Albert
Laura Bruno, UDI-Edmonton Region
Lindsey Butterfield, City of Edmonton
Gibby Davis, City of Edmonton
Cathy Ducharme, Strathcona County
Jordan Evans, Leduc County
Susan Evans, Sturgeon County
Troy Fleming, City of Fort Saskatchewan
Tom Flynn, Sturgeon County
Ryan Hall, Strathcona County
Steve Hill, Lamont County
Greg Krischke, City of Leduc
Jeff Laurien, Municipal Affairs - GOA
Marnie Lee, Strathcona County
Corey Levasseur, City of Spruce Grove
Sylvain Losier, City of Leduc
Katie Mahoney, City of Fort Saskatchewan
Craig Mahovsky, Sturgeon County
Eleanor Mohammed, Town of Beaumont
Bonnie Riddell, Strathcona County
Dana Smith, City of Leduc
Pamela Steppan, Strathcona County
Lynette Tremblay, City of St. Albert
Patty Walker, City of Fort Saskatchewan
Michael Walters, City of Edmonton
Janna Widmer, Strathcona County
Wayne Woldanski, Lamont County
1. Call to Order

Chair, Mayor Roxanne Carr called the meeting to order at 8:30 a.m.

2. Chair’s Opening Remarks

3. Approval of Agenda

   Motion: That the Growth Plan Update Task Force agenda of April 13, 2016 be approved.
   Moved by: Mayor Lisa Holmes, Town of Morinville
   Decision: Carried unanimously

4. Approval of Minutes, February 18, 2016

   Motion: That the Growth Plan Update Task Force minutes of February 18, 2016 be approved, as amended.
   Moved by: Mayor Nolan Crouse, City of St. Albert
   Decision: Carried unanimously

5. Debrief: Board Meeting March 10, 2016 Discussion

6. Debrief: Municipal Feedback

   Motion #1: That the Growth Plan Update Task Force accept the feedback from Capital Region municipalities as information to inform the Growth Plan Update 2.0.
   Moved by: Mayor Ralph van Assen, Village of Warburg
   Decision: Carried unanimously

   Motion #2: That the Growth Plan Update Task Force support the planned Board Engagement of one-on-one meetings and the development of a workshop for Municipal Administration to ensure understanding of the Growth Plan 2.0.
   Moved by: Councillor John Schonewille, Leduc County
   Decision: Carried unanimously


   Motion: That the Growth Plan Update Task Force accept the feedback from Capital Region Board CAOs as information to inform the Growth Plan Update 2.0.
   Moved by: Councillor John Schonewille, Leduc County
   Decision: Carried unanimously

8. Coffee Break

   Mayor Carr relinquished the Chair to facilitator Barry Huybens in order to continue to lead the Task Force through agenda item #9.
9. Growth Plan 2.0
   a. What’s Changing with the Growth Plan?
   b. Review of Draft 1.0 – Policies & Implementation Plan

   **Motion:** That the Growth Plan Update Task Force endorse the DRAFT Growth Plan Policies with the noted changes to be used as the basis for further engagement of CRB municipalities and regional stakeholders in the preparation of Draft 2.0 of the Growth Plan 2.0.
   **Moved by:** Councillor John Schonewille, *Leduc County*
   **Decision:** Carried unanimously

10. Lunch

    Victoria Brown and Joe Petrie left at 12:00pm.

    Facilitator Barry Huybens relinquished the Chair back to Mayor Carr following discussion.

11. Special Study Area: Sturgeon County

    It was approved by unanimous consensus that the Growth Plan Update Task Force receive the Sturgeon County update by Mayor Tom Flynn as information.

12. Next Steps
   a. Project Workplan
   b. Board to Approve Table of Contents – April 14, 2016

13. Adjournment

    It was agreed by unanimous consensus that the Growth Plan Update Task Force meeting be adjourned.

    Meeting adjourned at 4:18 p.m.

    **Next Meeting:** The Growth Plan Update Task Force requested CRB Administration search for another meeting date to address outstanding Policy areas and the Implementation Plan. (TBD in May)

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Task Force Chair, Mayor Roxanne Carr
April 28, 2016

Growth Plan Update Task Force
Capital Region Board
#1100 Bell Tower, 10104 103 Ave.
Edmonton, Alberta
T5J 0H8

Attention: Mayor Roxanne Carr, Capital Region Board, Growth Plan Update Task Force Chair
Email: roxanne.carr@strathcona.ca

Re: Edmonton Metropolitan Region – Growth Plan: Toward a Complete Region (March 24, 2016 Draft) – Town of Beaumont Review

Thank you for the opportunity to review the March 24, 2016 draft of the above mentioned plan. Based on the information provided and the discussion at the April 12, 2016 Growth Plan Update Task Force meeting, the Town of Beaumont has included feedback on specific sections of the plan and has attached this information in Appendix A – Town of Beaumont Feedback - Capital Region Growth Plan 2.0.

As you will see in the attachment, the Town believes that additional work is required on important matters related to minimum density targets, agriculture, and clarifying decision-making responsibilities. We believe that the proposed minimum density of greater than or equal to 50 du/nrha needs additional discussion as we do not feel that these targets are realistic for all municipalities within the metropolitan area. As you are aware, this more than doubles our existing target Priority Growth Area Ce of 25-30du/nrha. Other specific details related to these matters are included in the attachment. The Town is also not supportive of the CRB taking on other responsibilities relating to approvals of plans that are not included under the Capital Region Board Regulation.

The Town appreciates the process that the CRB is utilizing in updating the Growth Plan. We look forward to continued participation and opportunities to provide feedback. Should there be any questions or if you require additional details regarding the above, please do not hesitate in contacting the undersigned.
Sincerely,

Camille Bérubé, B.A., FCCUI
Mayor

ks/ml
L_CRB Edmonton Metropolitan Region - Growth Plan Response

cc. Councillor Kathy Barnhart, Capital Region Board Alternate
Malcolm Bruce, Chief Executive Officer, Capital Region Board
Sharon Shuya, Growth Plan Project Manager, Capital Region Board
Marc Landry, Chief Administrative Officer
Dave Dmytryshyn - General Manager, Planning and Infrastructure
Eleanor Mohammed - Director, Planning and Engineering

Attachment: Appendix A - Town of Beaumont Feedback - Capital Region Growth Plan 2.0
Appendix A – Town of Beaumont Feedback - Capital Region Growth Plan 2.0

Feedback from the Town of Beaumont is highlighted in **yellow**

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<tr>
<td>5</td>
<td>Global Economic Competitiveness:</td>
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<td>…Within the resource based economy, there is also opportunity to encourage regional economic diversification focusing on opportunities to diversify based on our economic strengths…</td>
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<td>Why are we only focusing on diversity within a resource based economy? Why are we not looking at greater innovation for this region as there is more potential?</td>
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| 9      | Table: Accommodating Growth in the Policy Tiers – Rural Area (1st bullet) |
|        | Encourage new growth in existing towns, villages and hamlets in the Built Up Urban Area and plan and develop contiguous Greenfield Areas to optimize servicing capacity and transportation connections |
|        | Hamlets are considered to have built-up area – the plan encourages new growth and contiguous greenfield growth to optimize services. Building these out does not optimize regional services and encourages bedroom communities, especially because they have a minimum greenfield density of 15 to 20 du/ha. |
|        | The Town understands why this approach is being proposed and requests that the Capital Region Board (CRB) consider the following implications: |
|        | - Greater costs for oversizing and building out regional infrastructure to adequately service these hamlets |
|        | - The lower density requirements could be more encouraging for developers to develop in these areas as opposed to the metropolitan areas therefore creating new ‘bedroom communities’ and further expanding the challenges we are facing |
|        | - Reinforces auto-dependency in the region |
|        | - Greater volume on regional roads from longer distances travelled |
|        | - Greater urban pressures (e.g. dogs impacting livestock, complaints about agricultural spraying, etc.) and costs for the surrounding agricultural lands |
|        | - Greater difficulty and costs in establishing a regional transit system |
Table: Accommodating Growth in the Policy Tiers – Rural Area (1st bullet) (Continued)

- Creates the 'bedroom communities' or 'commuter towns' of tomorrow, characterized by:
  - Low or little employment available in the community
  - The need for long commutes to larger towns or cities for services and employment
  - Poorer quality of life for residents in terms of community interaction, walkability, and social services
  - Higher residential taxes and costs for services
  - Long-term residents priced out of their communities due to the arrival of new wealthier residents.

Suggested solutions:

- Population growth in the rural portions of the Counties should be encouraged to locate in existing approved urban areas or the closest village, Town or City.

Planning for Prosperity and Competitiveness across the Planning tiers – Metropolitan Area (5th bullet)

Is "promoting the growth in the agricultural sector, including urban agriculture and opportunities for local food production and distribution" meant for the undeveloped agricultural leftovers (or islands)? What will happen with these lands? Being surrounded by urban uses will make them less viable for agricultural uses and they will face tremendous urban pressures (i.e. dogs from nearby residences stressing or potentially injuring livestock and complaints about agricultural spraying, etc.). Agricultural land owners will be placed in an unfair position where they cannot farm their lands or sell their lands.

Policy 1.3.1

The movement of people, goods and services to, from and through the region in keeping with its role as a gateway to Northern Alberta and Canada will be promoted. This includes movement by air, road and rail with a focus on the following transportation infrastructure corridors and adjacent lands:

- Edmonton International Airport;
- West Canamex Corridor/ Highway 16;
- Edmonton/ Calgary (Highway 2); and
- Fort McMurray (Highway 63)

Provide clarity on the West Canamex Corridor/ Highway 16 reference.
### Policy 1.3.1 (continued)

The regional corridors identified are larger than the Capital Region; they are more the scale of the North Saskatchewan Region. The Growth Plan should focus on how we get goods and services to these larger corridors, along our important regional corridors; how we develop them and support them. It would also be useful to have agreements between neighboring municipalities for heavy vehicle corridors. Examples of important corridors specific to our region include (which essentially feed the larger corridors that are referenced):

- Highway 2
- Highway 60
- Highway 19
- Highway 625
- Highway 21

### Objectives 1

*Minimize the impacts of regional growth on natural living systems*

Should we be integrating growth with natural systems and minimizing impacts; an ecological network approach?

### The Natural Living Systems Section in General

The North Saskatchewan Regional Plan covers lands from Banff all the way to Lloydminster. Its scope is far greater than the Capital Region and will not cover important local intermunicipal initiatives (existing and potential). The supporting Environmental Management Frameworks will include: Air Quality Management Framework; Surface Water Quality Management Framework; and a Biophysical Management Framework. These frameworks examine cumulative effects management, setting triggers and limits, versus setting environmental policies specific for municipalities.

An Environmental Master Plan for the Capital Region would satisfy the implementation measures for the Natural Systems Policy Area (Page 23).

- Plans such as a Capital Region Environmental, Open Space and Parks Master Plan could address:
  - Intermunicipal/regional policies to keep our local environment and ecological systems healthy
  - Identify and map region’s natural living systems that should be preserved
  - Identify and mitigate the impact of regional infrastructure
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<tr>
<td>19-24</td>
<td>The Natural Living Systems Section in General (Continued)</td>
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<td></td>
<td>▪ Minimize local fragmentation and identify important areas for habitat connectivity</td>
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<td>▪ Identify areas for intermunicipal ecological restoration</td>
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<td>▪ Regional commitments for protecting water and air quality in the region</td>
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<td>▪ Climate Change Adaptation</td>
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<td>▪ Local regional watershed management (to include the smaller watersheds in the region)</td>
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<td>▪ Integrated Regional Open Space and a greenways/trails system plan</td>
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<td>▪ Eco-Industrial requirements</td>
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<td>▪ Eco-tourism, Culture and Recreation</td>
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<td>▪ Measures for Low Impact Development</td>
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By deciding on regionally significant environmental, parks and open space policy as the Metropolitan Region, it provides certainty for stakeholders and developers. It also ensures that there is a level playing field between neighbouring municipalities; preventing those with less stringent environmental policies to attract more development.

20  

**Objective 4**

*Plan development to promote clean air, land and water and address climate change impacts.*

There is an expectation to address climate change impacts – do we have collective climate change data for the region? If not, how do we plan for it? Who would lead an impacts and adaptation study for the Metropolitan Region?

22  

**Policy 2.4.1**

*Land use patterns and regional infrastructure that reduce energy consumption and greenhouse gas emissions will be promoted to improve the region’s ambient air quality and the resiliency of regional infrastructure to withstand climate change impacts and natural hazard risks.*

This Policy confuses climate change mitigation and adaption. Mitigation reduces Green House Gas (GHG) emissions and energy consumption, adaptation is what builds resilience to climate change impacts. We won’t build resilience only by reducing GHGs and energy consumption, there needs to be actions to adapt (to climate change impacts) in infrastructure, building standards, etc.
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| 22 | Policy 2.4.4  
Proactively managing and monitoring ambient air quality in the region should be considered a high priority in the preparation, approval and implementation of regional and municipal statutory plans and transportation master plans to support the health and integrity of natural living systems and human health.  
How will this policy be implemented? Monitoring Air Quality is a Provincial responsibility, with the support of regional airshed groups, some municipalities, and industry. Most municipalities in the Capital Region do not have the capacity to measure air quality impacts when planning land or transportation. |
| 22 | Policy 2.4.5  
The Province’s Capital Region Air Quality Management Framework will provide guidance managing and monitoring ambient air quality in the Edmonton Metropolitan Region.  
The Province’s air quality management frameworks do not provide direction to municipalities. |
| 26 | Table: Regional Levels of Services in general  
This table is not from a regional perspective, it enters into municipal jurisdiction by naming specific land uses – is it meant to suggest uses that can occur in each policy tier or restrict? |
| 34 | Objective 4  
Plan and accommodate rural growth in appropriate locations and with a sustainable level of servicing  
Phrases/words like ‘appropriate locations’ and ‘sustainable’ are being used; How will these words be defined to provide clarity for all stakeholders? They will be used differently among member municipalities. |
<p>| 34-37 | The term ‘urban community’ is being used - for consistency should it be ‘urban centre’ or ‘built-up area”? |</p>
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| 38     | **Policy 4.4.2**  

*In the Rural Area, growth will be planned to be accommodated in the Built Up Urban Area and Greenfield Areas in towns, villages and hamlets in contiguous pattern and compact form to optimize existing and planned infrastructure and servicing capacity, and meet the intensification targets and minimum greenfield densities in Schedule 5 and Table: Density and Intensification Allocation by Tier and Community on page xx.*  

A density requirement of 15-25 d/ha for rural areas and hamlets does not create the 'compact' form that this policy is promoting. |
| 41     | **Implementation of this Policy Area: The Role of the CRB is to: Future Studies and Initiatives**  

The CRB should work with Developers (i.e. UDI, etc.) to help municipalities as a whole to develop strategies that will help implement the density and intensification requirements. This could include sharing best practices from other, denser communities with similar characteristics as the Capital Region, alternative financial models, and other incentive examples. |
| 45     | **Policy 5.1.1 (c)**  

*The regional transportation system shown conceptually on Schedules 9A through 9C: Transportation System will be planned and developed to:*  

c. Provide an efficient system of regional truck routes and over-dimensional corridors to ensure the effective and efficient movement of goods into and out of areas of significant industrial, commercial and agricultural activity;  

By regional truck routes, do we mean ‘heavy vehicle’ routes, not just dangerous goods? Will this be individual agreements between municipalities or is the CRB going to provide these routes in the updated growth plan? If would be helpful to have a regional approach, businesses would have a much easier time moving their goods across the region. Movement is not just needed in significant industrial, commercial and agricultural areas – deliveries with large and heavy trucks occur across the entire region. |
| 49     | **Implementation of this Policy Area: The Role of the Member Municipalities is to: Regional Context Statements and Municipal Statutory Plans (7)**  

*Complete Transportation Master Plans that demonstrably align with the Edmonton Metropolitan Region Growth Plan, and refer these plans to the CRB for review and comment.* |
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<td>49</td>
<td>Implementation of this Policy Area: The Role of the Member Municipalities is to: Regional Context Statements and Municipal Statutory Plans (7) (Continued)</td>
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<td>Section 632(3)(a)(iv) Municipal Government Act (MGA) requires that a Municipal Development Plan must address the provision of the required transportation systems either generally or specifically within the municipality and in relation to adjacent municipalities. As the Municipal Development Plan is a statutory document (required by the MGA) and the Transportation Master Plan is not, would it not just be easier to write a directive/provide the scope in the new Growth Plan for regional transportation to be included in the Municipal Development Plan? Adding more plans to the review process increases costs and demands on capacity for the CRB.</td>
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<td>52</td>
<td>Policy 6.1.2 (b)</td>
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<td>In the Metropolitan Area, following the completion of a land evaluation and site assessment tool and the adoption of the Regional Agriculture Master Plan, lands identified as priority agricultural lands will be preserved and responsibly managed to ensure the agricultural land supply is available to support long term local food production, diversification and growth of the region's agri-economy. Other prime agricultural lands in the Metropolitan Area may urbanize over time where necessary to accommodate regional growth in a manner consistent with the Vision, Principles, Objectives and Policies of this Growth Plan.</td>
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<td>If lands are identified as priority in the Metropolitan Area, it may not mean that they are realistically viable. Agricultural land owners could be placed in an unfair position where they cannot farm their lands or sell their lands. The price point on these lands will make them unaffordable for uses such as market-gardens or other small-scale agricultural uses. Most agricultural uses are trending towards 'super farms' – larger swaths of collected farm land in order to make a profit.</td>
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<td>52</td>
<td>Policy 6.2.3 (e)</td>
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<td>Mitigation measures are implemented to protect adjacent agricultural lands and operations from the near neighbour impacts of urban growth.</td>
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<td>What kind of mitigation measures can be implemented to protect adjacent agricultural lands and operations from nearby neighbourhood impacts of urban growth? Who will be responsible for implementing the mitigation measures? Is this entering into the realm of compensation, similar to that required in the Alberta Land Stewardship Act?</td>
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<td>Draft Schedule 3: Major Employment Areas</td>
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<td>This may need to be updated in the other maps as well: The natural living systems layer is missing the Saunders Lake area.</td>
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<td>Draft Schedule 9A: Transportation Systems – Regional Roads</td>
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<td>It is unclear what a 'Regional Arterial' and a 'Regional Expressway' are — they need to be defined.</td>
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<td>Depending on the definition of 'Regional Arterial', Beaumont may not want it through the centre of Town. The preference would be to have regional traffic on appropriate roadways around the community.</td>
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<td>There is also an unnamed Regional Arterial that traverses north-south between Beaumont and Highway 21 that we believe should be identified.</td>
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<td>Draft Schedule 5: Density Intensification Allocation by Tier and Community</td>
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<td>The minimum density, of greater than or equal to 50 du/nrha, needs additional discussion as it may not be realistic for all municipalities within the metropolitan area. This more than doubles the existing minimum target of 25 du/nrha in Priority Growth Area Ce. With an increase in density requirements, there are additional considerations that need to be addressed in the Growth Plan, including:</td>
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<td>a) The need for certainty in the region - municipalities will be required to update their plans and implement the revised density requirements immediately;</td>
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<td>b) The 'Growth Hamlets' should not be encouraged. This will just displace the low density development like Beaumont currently has to new 'bedroom communities' with lower density requirements (15-20 du/nrha), thereby not encouraging compact development in the region and promoting sprawl;</td>
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<tr>
<td>c) The CRB should commit to working with the development community to help local developers adjust their current models to accommodate the new density requirements;</td>
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<td>d) If a higher density is utilized for the municipalities in the metropolitan area, the density requirements for Towns outside of the Metropolitan Area should also be adjusted to a higher density target as well.</td>
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<td>'Growth hamlet' needs to be added to the glossary — it's defined on page 39 – 4.4.3.</td>
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Malcolm Bruce  
Chief Executive Officer  
11000 Bell Tower  
10104-103 Avenue  
Edmonton, AB T5J 0H8  

The City of Fort Saskatchewan continues to have significant concerns and questions regarding several areas of the proposed Growth Plan 2.0. In particular, we would like to draw your attention to the following matters:

Minimum Density for Greenfield Development

Methodology

We have questioned the methodology in determining the minimum density of 50 du/nrha and are unsatisfied with the response provided. Based on our review of planning documents for new Edmonton communities, the planned densities range from 30-40 du/nrha, with 2 exceptions. The community of Desrochers has a planned density of 44 du/nrha, however this area includes an LRT station. The other community of Goodridge Corners has a planned density of 41.8 du/nrha and was a City initiated project. As such, how was 50 du/nrha deemed to be an acceptable minimum to apply to all municipalities within the metropolitan area?

Implementation

The proposed minimum is double our existing target of 25-30 du/nrha. Without any regard for phasing over time, this is overly aggressive and unrealistic. Policy planning documents may specify a new minimum density, however support from the community will be required for successful implementation. We also need the developers and home builders committed to planning for and building a variety of housing types. We support establishing a new minimum, however it should be realistic and attainable.
Provision of Services

Successful communities involve more than just establishing a density minimum. Clear direction has not been given as to how the provision of services will be balanced with the proposed intensification. In particular, as it relates to parks, recreation, emergency and public transit services. Consideration should be given to the existing regulatory framework and whether it allows municipalities to adequately service such communities.

Development of Towns and Hamlets

The lower density targets in towns and hamlets may be more appealing to developers and builders. This may result in more new development within towns and hamlets, directing growth away from the metropolitan area. Growth in towns and hamlets will result in demand for significant infrastructure requirements such as schools and health care services. Given the associated inefficiencies, directing growth to major urban areas is ideal.

Intensification Target

It is our understanding that Edmonton currently has an infill rate of 13%, which includes downtown development. If the largest city in the region is unable to achieve 15%, how will our community do so? We appreciate that the 15% target is aspirational, however it is extremely aggressive and unrealistic.

Further, details regarding how municipalities encourage intensification would be helpful. Redevelopment or infill development can be difficult to implement due to matters such as costs, market demands and lack of community support. As such, specific tools such as potential changes to policy and zoning bylaw documents would be of assistance.

Alberta's Industrial Heartland Buffer

Section 4.7.1 speaks to the requirement for a risk assessment for all new developments within this buffer area. We request that this section be removed or reworded as the requirement should be to the discretion of municipality and determined on a case by case basis.

Agriculture

Section 6.2.3 sets criteria which needs to be satisfied in order to develop prime agricultural lands. We support that such land needs to be contiguous, however, we have concerns with the requirement to meet population and employment forecasts. Given these are forecasted numbers, we request that this section be reworded to provide more flexibility. While we support the discussions regarding agricultural land preservation, it must be done within the context of the impact on urban growth and that the discussion needs to have a balance.

As the Growth Plan will have significant implications at the municipal level, we are requesting careful consideration of our comments and concerns.

Respectfully,

Gale Katchur
Mayor
OFFICE OF THE CITY MANAGER

April 29, 2016

Mr. Malcom Bruce
CEO, Capital Region Board
#1100 Bell Tower,
10104-103 Avenue,
Edmonton, AB, T5J 0H8

Dear Mr. Bruce:

Subject: Edmonton Metropolitan Region Growth Plan 1.0 - City of Leduc comments

The City of Leduc has initiated preliminary review and analysis of the draft Edmonton Metropolitan Region Growth Plan (EMRGP) to help us better understand the potential implications for our city as well as to produce constructive feedback as outlined in this letter. The attachment accompanying this letter contains our rational. The City of Leduc hopes that this submission will help strengthen the regional conversation that will lead to version 2.0 of the EMRGP.

In regards to EMRGP 1.0 the City of Leduc would like to share the following:

1. Edmonton Metropolitan Regional Structure (EMRS) (schedule 1 in the EMRGP) is falling short in terms of major employment area identification in the vicinity of Edmonton International Airport.
2. Edmonton Metropolitan Regional Structure (EMRS) introduces some flexibility by containing three tiers, but requires additional nuancing to respect municipal character and local context.
3. Schedule 5, Density and Intensification, is too prescriptive and does not consider local context. Municipalities need to be empowered and accountable in order to achieve the regional goals, but this should not be done to the detriment of autonomy and local innovation.
4. Policy area 5 Transportation Systems, contains language that takes away autonomy from municipalities in terms of infrastructure classification and planning. This concerns the City of Leduc.
5. Agricultural policy discussion so far has been challenging. We need to elevate the discussion to the future of this important industry instead of solely focusing on its land implications. Furthermore, adopting the EMRS prior to developing the Regional Agricultural Master Plan and the Land Evaluation and Sites Assessment (LESA) tool could lead to lost opportunities.

T 780.980.7177 F 780.980.7127 1 Alexandra Park Leduc, Alberta T9E 4C4
6. Planning horizon needs clarification as a different time horizon has been introduced in conversation along the process. City of Leduc believes in the benefit of having a 50 year visions.

7. The implementation section of the EMRGP will need to contain tools or identify tools that will be developed to facilitate the implementation.

Thank you for your consideration of our interests; if you have any questions, please do not hesitate to call me directly or Mike Pieters, GM of Planning & Infrastructure at: 780-980-7151.

Sincerely,

Paul Benedetto, CLGM
City Manager
780-980-7130

Attachment

/Ilg
C:
Attachment – EMRGP comments on draft 1

1. Edmonton Metropolitan Regional Structure (EMRS) – major employment areas

The City of Leduc strongly believes that EIA should be designated as a major employment area in addition to being both an economic and a transportation asset of great significance. We have little doubt that with thousands of employees on site and a multi-billion dollar GDP impact, EIA meets the EMRGP definition for “a major employment area”.

It is our understanding that approved ASP’s as of October 2014 were used as the basis to define employment areas. We strongly believe that this provides an incomplete picture and could eliminate opportunities for the region. **We request the following changes to schedule 1 contained in the EMRGP:**

a. 65th Avenue corridor (south of EIA): The City of Leduc’s 2012 MDP that was approved through the CRB’s REF process, identified the 65th Avenue corridor as future employment (currently blank in the draft schedule 1). This should be recognized in EMRGP schedule 1.

b. Telford Lake area: the City of Leduc has recently adopted an industrial ASP in the vicinity of Telford Lake (Lakeside Industrial – December 2014) and will be initiating another ASP this year to plan the remnant area around Telford Lake in accordance with the Aerotropolis concept. Therefore, we strongly believe that the Telford Lake area should be included as part of the logical extension of the existing Leduc Business Park and part of the major employment area as it will host significant employment within the next 30 years.

c. West side of the EIA: The experience learned by other jurisdictions pursuing Aerotropolis development and all indicators that our independent, third party analysed when we did the Aerotropolis Viability Study, pointed towards an enormous potential for employment creation on the west side of EIA between the 65th Avenue extension and Highway 19. Furthermore, with the recognition of 65th Avenue as a significant part of the future regional transportation network, the expectation is that it will be built prior to the 30 to 50 year time frame. Therefore, it can be reasonably expected that economic forces will see strategic regional employment expand along the corridor and west of the EIA. **The EMRGP needs to recognize this potential and protect it** from incompatible land usage and lesser, productive type of development. This potential will need further investigation and perhaps using a special study area designation would be more prudent.
It is important to recognize the role of EIA in our Economic Competitiveness Policy area, but we must not forget the role of the surrounding lands, including Nisku and the Leduc Business Park which are also part of the major employment areas as they constitute the largest business park of its kind in Canada.

2. Edmonton Metropolitan Regional Structure (EMRS)

The City of Leduc supports the concept of having a tiered EMRS established for the purpose of defining the applicability of each policy contained in the EMRGP. This could be enhanced by having nuances within each tier to preserve the distinctive character of each municipality without jeopardizing the regional goals. For example, the City of Leduc has looked to other metropolitan regions to see if they used a single density standard for greenfield development for the entire metropolitan area and we failed to find one. There are, without doubt, higher densities in communities closer to the core of the metropolitan area and where amenities and infrastructure are conducive to that type of build form, but municipal character seems to be preserved.

Another element of concern that illustrates the lack of local context consideration by the EMRS, is the aspirational target for Urban Centre which is 100 dwelling units per net residential hectare. Being subject to the provincial Airport Vicinity Protection Act (AVPA) Regulation, it is impossible for the City of Leduc to even come close to this target.

3. Density and intensification – greenfields

The City strongly supports the removal of the maximum density target in greenfields as it will enable innovative development projects like the Crystal Creek community (160 acres) in Leduc. Crystal Creek will host a much higher proportion of services, amenities, and higher residential densities than anywhere else in the City of Leduc because the local context will be conducive to such build form. Furthermore, it will help with the goal of reducing the regional footprint and ensure we are more sustainable.

As for the mandatory minimum target proposed for the metropolitan area (50 dwelling units per net residential hectare), the preliminary analysis we conducted revealed that this target is not achievable for the City of Leduc in the short or medium term as it would require drastic measures that are simply unrealistic. We have strong concerns that, should this requirement becomes mandatory, it would simply sterilize our community’s growth and force developers to exploit currently approved ASP’s at lower densities (30 unites/ha).

The current trends, our servicing capacities, and our anticipated transit level of service growth lead us to believe that our next round of new communities have
the potential to exceed the current density target for our PGA (25-30).

Therefore, the City of Leduc’s administration would be in support of having an initial minimum density requirement for the City of Leduc that would be between 35 to 40 units per net residential hectare which could be adjusted with each review of the EMRGP (expected every 8-10 years). A target of net 50 dwelling units per net hectare is likely a worthwhile long term goal, but getting there will require a graduated approach.

Finally, greenfield density is an area of the EMRGP where the City of Leduc believes that nuancing within the tier would be beneficial. Because the City of Leduc’s proposed target should be 35-40 in our opinion, it does not mean that all other municipalities should automatically be designated the same. It is possible that other communities within the metropolitan area may have the building typologies (current mass and densities of neighbourhoods), the necessary transit service in place or available in a near future, a market conducive to this type of neighbourhood, and the infrastructure to support, in the short-medium term, a density of 50 units per hectare. In these circumstances, they should strive to meet or exceed this target. The key here is that municipalities should be benchmarked in relationship to their local context and capacities, not measured against artificial standards or targets.

Density and intensification – intensification target

We understand that this will be aspirational, but the City has some serious concerns about a 15% target for Leduc and an Urban Centre Density Target of 100 du/nrha. We have looked into our opportunities for intensification, redevelopment, repurposing, and mixed-use development and have found they are extremely limited. Please be assured that the City of Leduc is committed to tackle this important aspect of growth management, but certain factors are undeniable:

a. We have severely limited intensification capacity in our core because of the provincial Airport Vicinity Protection Area regulation (AVPA) as the AVPA’s most restrictive contours impact 44% of our city’s area. The AVPA ensures that land uses around the EIA are protected so that the airport can operate unhindered as a globally competitive airport and a regional economic driver. The trade-off is that it severely limits redevelopment and intensification in Leduc, as the most restrictive Noise Exposure Forecast (NEF) contours affect the bulk of our mature core neighbourhoods, including our downtown. The EIA is a significant regional asset. The City of Leduc understands that the integrity of the EIA must be preserved well beyond the time horizons contemplated in the EMRGP.

b. The City of Leduc’s total housing stock is generally quite young, with an overall average age of 21 years. Only 4% of our housing stock is 50
years or older, and the majority of those older dwellings are within the highly restrictive 30 NEF+ contours.

c. We have few vacant lots within mature neighbourhoods.

These factors will make it very hard to reach that proposed target of 15%. **Furthermore, we fail to see how the municipalities will be capable of forcing growth in the built-up areas.** We could use incentives to stimulate intensification, but we cannot foresee a means (e.g. regulatory) to deny development in planned greenfield areas where ASP’s are in place (City currently has 6 quarter sections planned for future residential in greenfields).

Being an aspirational target, the municipalities will be required to monitor and report on a yearly basis the intensification activities. **The EMRGP fails to define the purpose and intent of monitoring and reporting.** Is this for the purpose of adjusting targets to the respective local context or for reward/punitive measures? Also, it is important to note that the proposed definition of the Built-Up Urban area could alter the yearly result as it will account for fringe development as intensification because registered subdivision plans are to be included. Therefore, all developments on vacant, but registered lots will not count for greenfield development, if we understand the methodology correctly.

Finally, as per the greenfield comments above, nuancing is also very important for this type of development if we truly want to work towards achieving a reduced footprint. **Urban communities with older housing stock and infrastructure, no AVPA restrictions, strong transit services, and market opportunities to support intensification, should be required to aim for the highest intensification possible.** Through the work that we are currently doing, the monitoring that we will undertake as part of the EMRGP implementation and our upcoming MDP review; we are hope to be able to define an appropriate intensification target for Leduc and continue to “raise the bar”. We are hoping that other member municipalities will conduct similar exercises and that the EMRGP will enable us to choose the tools and the means to accommodate the appropriate level of intensification for our communities.

4. Transportation systems
The City of Leduc believes that the best outcomes are attained when municipalities work together to ensure a high level of integration of land use planning and infrastructure planning while meeting regional priorities much like the IRTMP. That responsibility resides with the municipalities that have jurisdiction on land use within their own corporate boundary. We agree with the language of policy 5.5 which depicts the role of the CRB as to facilitate the dialogue at the regional level. However, our interpretation of policy 5.3 is that the CRB would have increased responsibilities in matters that are of municipal
jurisdiction, and that is concerning to us as the prime role should be enabling and facilitating regional coordination.

As for roadway classification, we strongly believe that CRB should not be identifying regional roadways classifications, they should be taking those classifications from the regional members and having meetings to discuss where there are conflicts. The CRB respect the autonomy of municipalities to classify roadways within their own boundary. Otherwise, there is a real risk of conflict. For example, 65th Avenue is depicted as an expressway in schedule 9A. However, the City of Leduc has it designated as an industrial arterial, which enables this piece of infrastructure to function as an adequate support for economic development at and surrounding EIA. This enabled its high scoring within the transportation priority list. This would not be the case with expressway status where the access that is critical to economic development would have been much more limited.

5. Agriculture policy

This policy area is a very complex one. It seems that so far, the conversation has been centered on the land use component of agriculture with conversation about who can build where and how much. Indeed, the land use component is a big part of agriculture, but it is not the only part. We need to elevate the conversation about how this region can position itself as a globally recognized food producer. The EMRGP policies need to better recognize the delicate relationship between providing food, providing shelter and providing employment. We question the EMRS distribution of future residential areas within the metropolitan area in relation to employment nodes under the objective of having people working closely to where they are living? Is the EMRS truly achieving this?

Having an Agricultural Master Plan for the region as well as having a land evaluation and site assessment tool is a good idea in principle. However, until we know and understand the criteria and their weight that will be used in this tool, it is challenging to fully comprehend what it could mean for a city such as ours, when we are surrounded by great soil. Furthermore, there might be a risk of lost opportunities if we establish the metropolitan area prior to knowing where the prime agricultural lands are and how we want/can enhance the agri-food and agri-business economy. To our understanding, there does not seem to be a mechanism to adjust, if necessary, the tiered structure once the Regional Agricultural Master Plan (RAMP) is completed and there is no timeline associated with the enabling of LESA or the RAMP.

The glossary appears to differentiate solely, the priority, prime agricultural lands from the prime agricultural lands by the weight attributed to the land by LESA.
Therefore, we anticipate that LESA will be a trade-off monitoring and evaluating tool that will help make land use decisions (not make the decisions) in regards to keeping lands for agriculture or designating it for something else. Any clarification on this would be appreciated.

6. Time horizon

The time horizon associated with the evolution of the growth plan has been somewhat confusing and needs to be clarified. Does the growth plan have a 30 year or a 50 year time horizon? In conversation thus far, we have explored and discussed different horizons. Confusion is also added by the fact that we are measuring certain elements such as population and employment with the 2044 timeline, which is 28 years away.

We believe that there is merit in having a 50 year vision as many critical infrastructure and land use investments are the result of several years of planning and strategizing. Looking at the Edmonton International Airport’s current successes is the proof that looking a few decades ahead is beneficial. Furthermore, by having a mechanism to review the EMRGP at regular intervals (8-10 year cycle), will enable the region to act and adjust as necessary the policy framework to meet our long term vision.

7. Implementation

Regional context statements could be useful, but considering the requirement to amend the MDP within 3 years, we are not sure that they are necessary. Instead, maybe the ERMGP could contain/identify tools such as a checklist for municipalities to facilitate MDP reviews in order to achieve compliance or maybe tools suggestions for intensification.

From the City of Leduc’s experience, Inter-municipal Development Plans (IDP) have been a successful planning tool as they contain more localized and detailed information about adjacent municipalities and their interface than the EMRGP. The use of IDP’s in implementing the regional growth plans needs to be given greater consideration in the implementation tool box.
Dear Mr. Bruce:

Re: Draft 1 Growth Plan Update Feedback

In response to your April 20th email, Parkland County would like to provide the following comments on the first draft of the Growth Plan:

1. Chapter 3 Framework for Growth, section 3.2 under Agricultural Viability, “maintaining agricultural viability requires managing growth to protect prime agricultural lands from development, preventing fragmentation of the land base.” Statement about preventing fragmentation is representative of Parkland County’s total agricultural picture. This comment needs to be amended to say “preventing fragmentation for the purposes of accommodating non-agricultural uses in proximity of agricultural areas.” Parkland County has many viable agricultural producers and specialty / value added products that are located in agricultural areas on smaller parcels. The issue is when urban and country residential developments encroach on agricultural areas and increase the conflict between these uses.

2. Chapter 3 Framework for Growth, section 3.2 under Compact and Contiguous Development – this paragraph needs to also include the need for mixed use developments combined with compact and being contiguous. Compact and mixed use developments reduce the distance and number of trips made and contribute to more complete communities.

3. Schedule 1 (the map of the Edmonton Metropolitan Regional Structure) needs to highlight and indicate that once Strathcona County determines their next growth area, then the one not chosen should be removed from the map. Both are not needed to meet the Region’s growth needs. Removing it will allow agriculture to continue in that area and eliminate speculation that it will be development for urban uses.

4. Chapter 3 Framework for Growth, section 3.2 under Edmonton Metropolitan Regional Map – Rural Centres bullet. The issue is that “Rural Centres” are not well defined in the definitions or in roles and functions. Case in point is that it does not include Hamlets under Rural Centres. In the region some Hamlets are old towns that are no longer incorporated. They serve the same function and have the same attributes as Villages and smaller towns. Entwistle for example is very similar to Wabamun yet Wabamun is defined and shown as a Rural Centre, yet Entwistle is comparable in size, function and attributes, and not recognized only because it is no longer incorporated. Then we have the Summer Village of Seba Beach and it is not even on the map despite being similar to both the others. This needs to be reviewed across the region.

5. Policy 1.3.1 needs include Highway 43 as this is an important trade route connecting Alaska and the north. Also The CNR mainline runs straight through the entire region and connects to the rest of the Country, yet not mentioned as a corridor or important transportation infrastructure.
6. Schedule 5: Density and Intensification Allocation by Tier and Community – Under Growth Hamlets and Other Hamlets it is not clear as to who will determine one from the other. Will this be left to the Counties to determine?

7. Policy Area #2 Natural Living Systems – There is nothing in this chapter or anywhere else that identifies impacts of Climate Change and how our long-term regional planning has a direct impact on this and subsequently our Natural Living Systems.

8. Policy 4.7.1 requires to be amended. Safety and Risk Management is based on identification of the risk and managing the risks on site in the case of heavy industrial, and separation in the case of non-industrial uses. Management Plans are based on the cumulative risk of industry and that risk profile defines the separation distances and what uses should be how far back based on international standards. Policy 4.7.1 is unclear as to what type of land use is to be evaluated for risk. The policies in the existing Regional Growth Plan are much more accurate and should be maintained.

9. Policy 4.7.2 fails to recognize the Strathcona Industrial Area (which is not part of the Heartland) and is one of Canada’s largest petro-chemical clusters.

10. Section 4.7 “Implementation of this Policy Area” – It talks about intensification and refers to schedule 5, yet for Rural Centres and Metro Areas there is no target for employment density.

11. Schedule 9c should include Highway 22 as a high load corridor down to Drayton Valley and Highway 627 as a heavy haul highway.

12. Under Policy Area 6 – Agriculture - it is important to highlight that the CRB needs to prepare an Agricultural Master Plan before it implements the Land Evaluation and Site Assessment tool. Understand what you’re trying to protect before you try and protect it. Also the regional plan needs to consider the work being done by the Counties as part of their master plans in order to ensure a consistent approach. The other reason is because the County master plans have gone through extensive discussions with agricultural producers. This is important to ensure a viable future agricultural industry.

If you require clarification on any of our comments, please contact our office. We look forward to receiving the second draft toward the end of May.

Yours truly,

[Signature]

Rod Shaigec
Mayor

Copy: Parkland County Council
Rob McGowan, Interim CAO
Peter Vana, GM, Development Services
Dear Mr. Bruce:

Re: Draft Growth Plan 2.0

The City of St. Albert would like to thank you and the Growth Plan Task Force for the work you’ve done on the Growth Plan Update and for the opportunity to provide feedback as part of the process.

We have outlined some initial questions and concerns below with some corresponding recommendations for your consideration.

Context Setting

The Plan seems to be missing some key context-setting elements that would help keep it grounded and connect the various policy tiers. It is unclear, based on the policies in the draft Plan, what problem(s) we are trying to solve. Is it exclusively urban sprawl? Is it preventing loss of agricultural land? Is it managing growth responsibly? What was the agreed upon problem at the outset of this project?

Secondly, the Plan is missing a visionary element. What are we, as a region, aspiring to 30 years from now? What are the desired outcomes? Is it simply to be a higher-density region? Again, discussions leading up to this project suggested it was to be globally competitive – economically and with respect to quality of life. Section 3.1 references “2064 Vision and Guiding Principles” but they are not included in the current draft.
Recommendation: Clearly define the problem(s) we are trying to solve and the 2064 Vision and Guiding Principles for the region to ensure a clear connection is made between the policies and the vision.

Densification

The draft Growth Plan 2.0 appears to be focused on a densification and intensification approach. Are we confident this approach will solve our problem (once it’s been clearly defined)? If so, have we done our due diligence in examining what other comparable regions have used this approach – and to what resulting successes or failures? Similarly, have we explored the risks and implications of taking such an approach in our planning? And subsequently, have we explored how to mitigate those impacts? For example, intensification has impacts on our existing infrastructure – do the policy tiers account for this?

Given these impacts, does the Growth Plan 2.0 provide enough flexibility to municipalities to align their planning with best practices in order to mitigate the negative affects of intensification? For example, what options do municipalities have if their current infrastructure cannot support the targeted increased density? Alternatively, do the municipalities have flexibility in where and how to apply the density targets based on existing and planned infrastructure or ASPs?

Recommendation: a) Perform a risk assessment and develop a mitigation strategy (and policies) relevant to the region’s unique attributes; b) Provide enough flexibility for municipalities to be able to direct growth where it makes sense while still meeting an overall target (i.e. instead of requiring every ASP meet 50du/nrha, attribute the target to the overall greenfield area of the municipality).

Economic Development

One of the main premises of the Growth Plan Update was a desire to create an economically competitive environment that would foster job creation and increased investment. However, the current draft Growth Plan 2.0 has strong residential policies and lacks the same strength in other areas, namely economic development. The policies in the Economic Competitiveness & Employment section are the most ambiguous in the draft Plan and require further detail and direction. For example:

1) This section lacks clarity on how the “Major Employment Areas” were chosen and whether/how each municipality’s employment lands factor in. The City of St. Albert, for example, has identified employment lands through the MDP which are not yet developed and not identified within the Growth Plan 2.0 – will those be supported?
2) This section states that employment growth in a broad list of sectors will be “encouraged”. However, there is no detail as to how they will be, what is required of municipalities and what industries will be targeted for what areas. Currently no direction or parameters provided to municipalities about how they can and should develop employment areas.

3) Are the employment policies aligned with the rest of the objectives and policies in the plan? For example, are we aligning the intensification plans with the employment plans to develop combined living and work places to reduce commute-in, commute-out traffic? Additionally, why is the intensification target for “urban centres” measured in du/nrha instead of jobs + people? Policy 4.5.3 directs urban centres to provide a balanced mix of uses including residential, commercial, institutional, cultural and entertainment. Jobs + people would provide an appropriate flexibility to meet intensification that balances the existing and future land uses.

4) With respect to the objective “attracting and retaining a skilled workforce by providing diverse housing options in proximity to jobs”, is the inverse also true? Is providing jobs in proximity to existing housing also supported? For example, St. Albert provides a key support to economic development within the region through housing. Inversely, support for employment lands within St. Albert would help bring jobs in close proximity to existing housing.

Recommendation: a) Include more detailed identification of employment areas to include employment lands and suggested uses based on location, transportation and transit corridors and employment growth projections; b) Give equal consideration to targeted employment growth as targeted population growth.

Thank you for your consideration of these issues. We look forward to discussing them further and participating in the upcoming consultation process.

Sincerely,

Patrick Draper
City Manager

cc: City Council
    Senior Leadership Team
    Capital Region CAO’s
May 4th, 2016

Capital Region Board
#1100 Bell Tower, 10104 - 103 Avenue
Edmonton, AB T5J 0H8

Attention: Malcolm Bruce, Chief Executive Officer

Strathcona County would like to thank you for the opportunity to provide comments on the first draft of the Capital Region Growth Plan 2.0. Below is a list of items we are providing comments on or are looking for clarification on. The comments have been organized into Primary Comments, Primary Concerns, Additional Comments and General Comments. Strathcona County requires a response to each of the Primary Comments and Primary Concerns listed below.

The County is in agreement with the concepts of “centres”, complete communities, compact growth, as well as the Metropolitan Structure. We note that our municipality already follows a similar model to the Metropolitan Structure in our Municipal Development Plan (MDP). Our MDP directs growth to the Urban Service Area and Hamlets and protects Agricultural lands (Agricultural Large Holdings Policy Area) and Environmentally Sensitive lands (Beaver Hills Moraine Policy Area).

The Additional Comments and General Comments below are provided to highlight questions and clarification requested by Strathcona County in understanding the intent and implementation of the policies in this document. Given the importance of this document and its impact on land use planning and the future of our municipality a detailed review was conducted. It is anticipated that the Administrative workshops as well as a planned “toolkit” will assist in answering most of the Additional Comments and General Comments listed; however, Strathcona County would appreciate consideration in providing clarification within the document itself where the CRB considers it appropriate.

Primary Comments

1. Schedule 1: Edmonton Metropolitan Region to 2044 - the draft document indicates that the Metropolitan Area lines are not growth boundaries and are conceptual policy lines. The lines "provide direction as to where policies...apply within each of the three policy tiers..." Given the interpretation provided, lands outside of the Metropolitan Area are part of the Rural Area and the Rural Area Tier policies apply. Strathcona County therefore has the following comments with respect to Schedule 1:

- As per previous correspondence to CRB Administration from Strathcona County Land Development Planning regarding this map, an area north of Point Aux Pins Creek and south of Range Road 540 (north Bremner) has been located within the Rural Area where the Rural Area Tier policies will apply. This area is identified as part of Priority Growth Area (PGA) ‘F’ in the current Capital Region Growth Plan approved by the Province in 2010. Prior to the Capital Region Growth Plan, this area has been identified as Urban Reserve in Strathcona County’s MDP since 2007. In this regard, a decision was made by Strathcona County Council confirming the Urban Reserve identified in our MDP and the existing PGA as Strathcona County’s next area for growth on March 22, 2016. It is therefore necessary that the entire Urban Reserve area...
be identified as part of the Metropolitan Area and subject to policies applied to the Metropolitan Area Tier.

- Colchester has been identified as a Potential Metropolitan Area. Strathcona County Council made a motion on March 22, 2016 for Administration to provide land use options regarding the Colchester area as part of the ongoing MDP update. It is expected that this information will be presented to Council in the fall of 2016. In this regard, Strathcona County has concluded that the Colchester area can be removed from the Metropolitan Area at this time.

- We have an area identified within text and on a map in our MDP adopted in 2007 called the Development Expansion Area. This area is located south of Highway 16, north of the CNR tracks, east of Highway 21 and west of Highway 824. This area is identified in our MDP for future commercial, light industrial and public service land uses and an Area Concept Plan is currently in progress. In order to ensure efficient use of infrastructure north and south of Highway 16 for future development occurring in Bremner, it is necessary that this area be included as part of the Metropolitan Area.

- Given that the Metropolitan Area lines are not growth boundaries and are conceptual policy lines, a process or criteria should be defined in instances where lands within the Rural Area need consideration to become part of the Metropolitan Area.

2. Major Employment Areas - Schedule 1: Edmonton Metropolitan Region to 2044 and Schedule 3: Major Employment Areas needs to include lands within the North of Yellowhead Area Concept Plan and the West of 21 Area Concept Plan as major employment areas. These are statutory documents that have identified large tracks of land for industrial and commercial development. As discussed above, the Development Expansion Area also needs to be identified as a Major Employment Area.

3. Rural Centre - Ardrossan needs to be identified as a Rural Centre given it functions as a Rural Centre and meets the criteria for a Rural Centre as per the table on Page 26 Regional Levels of Service. Ardrossan is technically a Hamlet but functions as a Rural Centre in Strathcona County similar to how Sherwood Park is technically an Urban Service Area but functions as an Urban Centre.

4. Greenfield Density - Schedule 5 identifies a minimum Greenfield Density for Sherwood Park and Bremner at 50 du/ nrha. Strathcona County has concerns with this target number as it is a substantial increase from the density targets in the current Capital Region Growth Plan. It is also not understood how this target is to be achieved over a large area. There are concerns that 50 du/ nrha would not be supported by market conditions. Given that previously approved ASP’s in the Capital Region encompass large populations and areas which may have a 10 to 20 year supply of land or more, new ASP’s trying to build out at 50 du/ nrha would be put on unequal footing with previously approved ASP’s building out at substantially lower densities. Strathcona County supports a target density of 35 du/ nrha for all urban communities within the Metropolitan Area based on technical work and community consultation completed as part of the Bremner Growth Management Strategy. As can already be observed in new areas of Sherwood Park such as Salisbury Village and Emerald Hills, Strathcona County will continue to encourage future development to achieve greater densities where appropriate.
Consideration should be given as to how Growth Plan 2.0 will achieve compact development and complete communities for the region when incorporating the lifespan of previously approved ASP’s. In addition, clarity is needed regarding how density targets and policies will be applied when amendments are made to previously approved ASPs (i.e.: what type of amendment would trigger the change to the new density target).

5. Intensification Targets - Schedule 5 identifies an Intensification Target for Sherwood Park at 17.5%. It is necessary that any reference or policy regarding Intensification Targets be removed from the Growth Plan. Direction on how much, when, and where intensification and infill should occur are conversations that need take place at the municipal level between Council and the community and residents affected.

6. Infrastructure Master Plans – Strathcona County has determined that it is necessary to remove any reference to or policy requiring Infrastructure Master Plans to be sent to the CRB. There is concern with local autonomy as well as timing, capacity and understanding of the local context for CRB to review these documents.

**Primary Concerns:**

1. Prime Agricultural Lands - Policy 6.1.2 (b) - clarification is requested as to how this policy will be implemented with respect to other policies regarding compact and contiguous development such as policies 6.2.3. and 4.3.3. LESA should not be identifying lands within the Metropolitan Area as Priority Prime Agricultural Lands as this would not support compact contiguous development.

Policy 6.2.2 – it is noted that residential growth within towns, villages and hamlets was not listed as non-agricultural uses in this policy but is included in the definition. Please clarify the intent of this policy.

Policy 6.3.1 - Please clarify how this policy is to be implemented and how it relates to Priority Prime Agricultural Land as well as subdivision. Strathcona County continues to use its MDP to preserve the majority of CLI identified Class 1 Prime Agricultural Land as Agricultural Large Holdings Policy Area which limits the subdivision and fragmentation of agricultural lands to only two (2) parcels per quarter section.

With respect to Schedule 10: Agriculture Lands, a substantial portion of Prime Agricultural Lands are also identified as Alberta’s Industrial Heartland Major Employment Area. There are concerns with respect to the language regarding the preservation of Prime Agricultural Lands and the potential impact this language could have on development in the Alberta’s Industrial Heartland. For example on page 13, Side Bar Table: Planning for Prosperity and Competitiveness Across the Policy Tiers – Rural Area – “encouraging job Growth...located away from Agricultural Prime Lands...” Language surrounding these competing concepts needs to be revisited to ensure it does not detrimentally impact potential job and economic growth within the Alberta’s Industrial Heartland.

Strathcona County is also currently updating the Heartland Area Structure Plan to provide land use direction and to support the continued growth and prosperity of this area. This update has included substantial consultation with major employers and stakeholders in the area. Additional layers of policy from the Growth Plan 2.0 should
be carefully considered to ensure they do not adversely affect the work municipalities, stakeholders and organizations have completed.

2. Beaver Hills Biosphere and Natural Living Systems - Strathcona County requests a meeting with CRB Administration to address how the Beaver Hills Biosphere designated by UNESCO has been incorporated into the policies of this document. The components and context of the Biosphere does not fit with the current definition of Natural Living Systems or the policies proposed in this section that will impact this area. Given the amount of work the Beaver Hills Initiative has undertaken to obtain the UNESCO designation, special consideration should be given to ensure it is properly identified and addressed if it is to be incorporated into this document.

Strathcona County also has concerns regarding the policies with respect to Natural Living Systems and Key Wildlife and Biodiversity Zones as identified on Schedule 6: Natural Living Systems and their potential impact on the Alberta Industrial Heartland. Strathcona County requests information as to how the Key Wildlife and Biodiversity Zones were identified.

3. TOD Centre - Strathcona County notes that there has been no TOD centre located for its municipality and would like additional information regarding how TOD centres were identified. As well, previous CRB documents have identified a long term LRT connection to Strathcona County's Urban Service Area. Clarification is requested as to why this is no longer the case in Growth Plan 2.0.

4. Country Residential - aside from Policy 4.4.4 regarding infill and buildout of existing country residential areas, the plan appears to lack policy surrounding country residential development. Although the Briefing Note identifies Table 3: Minimum Average Country Residential Density, the draft Growth Plan itself does not. Schedule 5 identifies Rural Area and a target that "varies" It is understood from private industry that for Strathcona County if the density was increased above 50 parcels per quarter section under the current Growth Plan, it would make country residential development more viable. Please clarify whether the intent of the plan is to not identify country residential targets.

5. Regional Context Statements - although an example was provided on what a Regional Context Statement could look like, the amount of information identified in the Implementation of each Policy Area appears considerably more than just a few pages of text. This requirement may be onerous in terms of time and money for municipalities. Strathcona County finds this requirement repetitive and redundant when this work can be completed as part of MDPs and other statutory documents. As well, Regional Context Statements have no standing within the Municipal Government Act.

6. Policy 4.1.2 and the definition of Urban Communities - clarification is requested with respect to the use of the term Urban Communities in this context and the definition provided. In addition, Strathcona County requests that its use as an example be removed from this definition. An update to our MDP is currently being conducted whereby the terms community and neighbourhood will be identified in the context of our municipality.

7. Additional Studies - it is noted that the intent was to move away from multiple documents for the Growth Plan 2.0; however, the document itself outlines a number
of additional studies and work yet to be completed such as an Agriculture Master Plan, Regional Infrastructure Master Plan and the Regional Integrated Open Space Master Plan. There is concern regarding the timing of these additional documents and how they will be integrated into the Growth Plan 2.0 if at all.

Additional Comments:

Chapter 3 Framework for Growth

1. Page 7 - 3.3 Edmonton Metropolitan Region Structure – Policy Tiers - the definition of Rural Area should include Major Employment Areas as the Alberta’s Industrial Heartland is a Major Employment Area within the Rural Area.

2. Please consider defining the term rural working landscape used throughout the document and within definitions.

3. Review and consideration may need to be given to the identification, definitions, and policies associated with Major Employment Areas and whether Urban Centres should also be identified as Major Employment Areas.

Strathcona County may define Sherwood Park’s Urban Centre to include the County Hall, Community Centre and surrounding businesses, an area that employs hundreds of people. Further to this, please see comments regarding Policy 1.2.1 under Policy Area #1 Economic Competitiveness and Employment.

Chapter 4: Regional Policies

4. Page 11 – 4.2 (5) Interpreting the Policies – “all statutory plans must comply with the minimum greenfield densities...” the phrase “all statutory plans” is noted here in interpretation as well as in Schedule 5; however, Chapter 5 indicates otherwise given the grandfathering clause as discussed above. The intent should be clarified here and in Schedule 5. Further to this section, the third sentence appears to contradict the first and Schedule 5 in that “member municipalities are encouraged to meet (not required) or exceed the minimum Greenfield density...” It is understood the Greenfield density is required, not just encouraged.

Policy Area #1 Economic Competitiveness and Employment

5. Page 13 – Side Bar Table: Planning for Prosperity and Competitiveness Across the Policy Tiers – Rural Area – “Focusing commercial, industrial, institutional and office development in Rural Centres ...” It may not be appropriate to focus all types of industrial development within Rural Centres given the potential in-compatibility of land uses. For example, medium industrial and heavy industrial development in the Rural Area for Strathcona County is predominantly focused within the Alberta’s Industrial Heartland, not within Rural Centres.

In addition, Strathcona County is currently working on the Development Expansion Area which contemplates industrial and commercial development within the Rural Area, but not within a Rural Centre.

6. Page 13 – Side Bar Table: Planning for Prosperity and Competitiveness Across the Policy Tiers – Rural Area – “fostering recreation activities and promoting recreational corridors” – please identify and define the term recreational corridors.
7. Policy 1.2.1(a) encouraging intensification of Major Employment Areas and increasing employee density in areas with multi-modal transportation access in the Metropolitan Core and Metropolitan Area. Intensification is not defined but Intensification, Urban is. Consideration should be given to whether the term Urban Intensification fits within the context of this policy. This policy may be more appropriately aimed at Urban Centres in the Metropolitan Area.

8. Policy 1.2.1 (e) - "promoting job growth in areas within close commuting distance to where people live" Please explain how close commuting distance is defined. Similarly please clarify with respect to Policy 1.4.1.

9. Policy 1.2.2 and 1.2.3 - it is unclear how the supply of land to accommodate employment is to be identified and calculated. Clarification is requested as to whether Strathcona County is to define this, or if this is in reference to the Schedules that identify Metropolitan Area lines, Major Employment Area boundaries, and or Urban Centre boundaries. Until it is clarified how the supply of land is defined, Strathcona County is unsure how to implement these policies.

10. Policy 1.2.5 - please define: Municipal Comprehensive Assessment, employment uses as well as non-employment uses. Please clarify if conversion to non-employment uses includes land, whether land for agriculture, parks, trails, environmental reserve would be considered non-employment use or if non-employment is restricted to only residential uses or structures. Please clarify the context and intent of this policy with respect to policies 1.2.1 and 1.4.1.

11. Policy 1.3.1 - this policy should identify which schedule or map where these important corridors are identified. Corridors to and from Strathcona Industrial and the Alberta's Industrial Heartland should also be identified in this list.

12. Policy 1.3.2(b) - "in accordance with...Schedule 4: Infrastructure and Energy Corridors..." Strathcona County understands this schedule to be conceptual only and that further work will be completed in collaboration with Strathcona County to identify regional energy corridors. Please consider revising "in accordance with" to "as conceptually shown on Schedule 4: Infrastructure and Energy Corridors" to ensure the policy confirms the intention of the alignments in Schedule 4 to be interpreted as conceptual.

13. Policy 1.3.2 (e) - please describe and define the components of and requirements for a "Business Case" identified in this policy.

Policy Area #2 Natural Living Systems

1. Please see primary comments and concerns with respect to the Beaver Hills Biosphere and Wildlife and Biodiversity Zones within this section.

2. Policies in this section seem to be using phrases and terms that are undefined making their intent and implementation difficult to understand. The glossary for defined terms provides little clarity. For example: Ecological Network as defined needs clarification regarding the term semi-natural landscape elements. The phrase "best management practices" in multiple contexts provide little guidance. For example 2.1.2 - please define or provide reference to "ecological design best
practices" in Alberta to clarify how the CRB will be evaluating this policy. Similarly, "conservation tools" should be defined or referenced in 2.2.2.

3. Policy 2.1.1 - the wording of this policy and other policies within this section may need to be revisited with respect to the jurisdiction and capacity of the CRB and its Administration. For example "prior to the approval of regional infrastructure..." The CRB would not be considered the final approving authority regarding regional infrastructure such as Provincial Highways. Further clarification is needed as to whether it is expected that these technical studies will be submitted to the CRB for review and if CRB Administration will have the technical expertise to provide comment. It should be made clear that the municipality has the authority to determine the appropriate technical study needed and its content. Also the word "required" in this sentence may not be appropriate as it has not been determined that conservation buffers, flood zones and development setbacks are needed until the appropriate technical study has been completed.

4. Policy 2.3.1(d) – Provincial Wetland Policy should be referenced here. Wetlands can be altered or removed if approved by Alberta Environment and compensation is provided in accordance with the Provincial Wetland Policy.

5. Policy 2.4.4 - monitoring of ambient air quality is not a function of Municipal Statutory Plans.

6. Role of the CRB – 1(a) page 23 – the CRB, and member municipalities do not have jurisdiction to implement policies with respect to Provincial and National Parks.

Policy Area #3 Communities and Housing

1. Page 25 Complete Communities and Policy Tiers – "...in the Metropolitan Area, the elements of a complete community might be provided throughout a municipality..." This statement appears confusing with respect to policy 3.1.4 whereby Greenfield development is to be planned as a complete community in and of itself.

2. Page 25 Regional Level of Service – "The concept of complete communities is closely aligned with the concept of levels of service..." Policy 3.1.3 Greenfield in Rural Areas does not identify any services in the criteria listed.

3. Policy 3.1.3 (c) and 3.1.4 (d) - please define interconnected street network and active transportation.

4. Policy 3.1.5 - please provide clarification with respect to the implementation of this policy and how sufficient would be determined in this context.

5. Strathcona County does not necessarily agree with the Role of member municipalities – 14 – page 31 “acquire land for the development of non-market housing” this role does not appear to align with Strathcona County’s Final Report and Recommendations from the Mayor’s Task Force on Community Housing.
Policy Area #4 Land Use and Infrastructure

1. Page 33 third paragraph “A significant share of growth in the Rural Area will be accommodated in hamlets, towns and villages...rather than dispersed across the rural countryside.” Policies under Objective 4 may not provide the direction needed to achieve this statement given the substantial amount of country residential lands still currently available and the lack of policies surrounding density targets in the Rural Area.

2. Please refer to Primary Comments and Concerns regarding intensification targets.

3. Policy 4.3.3 (d) – clarification is requested as to how this policy is applied and works together with Policies 6.2.1 and 6.2.2. Greenfield is defined as an area for future urban growth. 6.2.1 and 6.2.2 do not speak to urban growth, but utilities, employment areas and infrastructure. Clarification is requested as to whether a Greenfield area would be rejected in the Metropolitan Area or Rural Area if it is within an area identified as Prime Agricultural Land but meets all of the other criteria listed in 4.3.3. Alternatively, consideration could be given to deleting 4.3.3(d) if the intent is a repetition of Policy 4.3.4.

4. Please clarify the interpretation of 4.3.3(c) as capacity can be built/ constructed.

5. Policy 4.5.2 – clarification is requested on what is meant by pedestrian and cycling facilities and whether this is in reference to transportation infrastructure or amenities / services, and how pedestrian and cycling facilities differ from active transportation.

Policy Area #5 Transportation Systems

1. Policy 5.1.2 (a) – the interpretation of this policy is not clear. If the interpretation is that road widening and additional lanes are solutions, with respect to Built-Up Areas this policy may not be in keeping with current trends in transportation planning. Current trends have indicated that increasing road infrastructure (road widening / additional lanes) does little to relieve traffic congestion long-term. In fact, this may be counterproductive when attempting to increase alternative transportation modes, density and achieve compact development. Consideration should be given to the concept of Complete Streets, road “diets” and other related transportation trends.

2. Policy 5.2.2 – the emphasis on Park and Ride facilities located at or in proximity to LRT stations and other major transit stations is in direct competition with the concept of Transit Oriented Development. Park and Ride facilities sterilize land which could be developed as higher density walkable neighbourhoods. Further consideration and policy development should be given to these competing concepts.

3. 5.2.3 – more emphasis should be given to this policy as discussed above regarding Complete Streets with respect to Policy 5.1.2.

4. Policy 5.3.1 and 5.3.2 – please clarify the intent and implementation of these policies and what is meant by “actively managed”
Policy Area #6 Agriculture

1. Clarification is requested regarding the definition of Prime Agricultural Lands. In the definition only CLI is defined claiming CLI Class 1, 2, and 3 are Prime; however, the definition then indicated LSRS (which is not defined) will be utilized and Schedule 10: Agricultural Lands uses LSRS. Only LSRS Class 2 and 3 are shown and considered Prime. Although LSRS may utilize the CLI classification to some degree, clarification should be provided on how these different rating systems are being used to define and implement policies regarding Prime Agricultural Lands in this document. If CLI is not being utilized, we question why it is being defined for Prime Agricultural Lands.

2. Policy 6.1.1- this section may need to be revised as including “Priority” when referencing Prime Agricultural Lands. For example: “...long term, Priority Prime Agricultural Lands will be identified, prioritized and preserved...” and “...the identification of Priority Prime Agricultural Lands will be achieved through...”

3. Policy 6.1.1 (b) – clarification is requested as to the implementation of this policy with respect to the “utilization of existing Agricultural Master Plans for prioritizing Prime Agricultural Lands.”

4. Please see Primary Comments and Concerns for remaining policies on Agriculture in this section.

Chapter 5: Implementation

1. Page 57, 5.2.1 (4) and Page 58 5.2.2 and 5.6 - if the CRB is going to be requesting data from member municipalities, further clarification and definition is needed regarding the expected content of Annual Reports and key performance measures (KPIs) and municipal data on growth to ensure the proper tools and protocols are in place to track the information.

2. Please see Primary Comments and Concerns for comments on Regional Context Statements, Additional Studies and referral of Infrastructure Master Plans.

General Comments:

1. Strathcona County has general concerns regarding the language of the policies which are intended to support the overall vision of the Growth Plan 2.0. More specifically at times the direction and interpretation of the policy is unclear given the words and or phrases used. For example:

   a) The word Conversion is used in Policy 1.2.5; however only the Conversion of Agricultural Lands is a defined term but is likely not the proper term to use in the context of Policy 1.2.5.

   b) Policy Tier – this definition appears to lack clarity when used in context such as Policy Area #3 Objective 1. Within the document, Policy Tier appears to be defined as areas consisting of the Rural Area, Metropolitan Area and Metropolitan Core as depicted on Schedule 1: Edmonton Metropolitan Region to 2044.
c) Intensification, Urban is a defined term but urban intensification is not found within the document. The term intensification is found in the document. Policy 1.2.1 (b) may be an instance where the term intensification is used but the definition for urban intensification may not be appropriate.

d) Policy 4.3.3 – Planned Lands is not a defined term but Planned Areas is.

e) Other examples have been provided in the Additional Comments above.

2. Consideration should be given to removing the word “permitted” used throughout this document. The word permitted often implies that something will inevitably be approved, which may not always be the case. For example:

   a) Policy 4.4.4 – “In the Rural Area, country residential development will only be permitted...” further study and investigation would be required to determine if a proposed country residential subdivision should be permitted.

3. The use of words such as promote, encourage, foster and aspirational provide little direction for implementation. Generally the use of these terms underscores implementation of policies as they do not prescribe requirement and in some instances read like objectives. Consideration should be given to strengthening the language to ensure municipalities and the development community work toward implementing the policies of this Plan.

4. Sidebar Tables – It is unclear how these tables are to be utilized. Consideration should be given to explaining in the text their purpose; it appears they should be interpreted as additional policies. Sidebar Tables should also be numbered so they are easily referenced.

Glossary:

1. There are definitions (the same definitions) for Rural Area as well as Rural Area Tier. If there is a distinction please clarify.

2. Hamlet - is defined as an “unincorporated Urban Community...” however the term incorporated Hamlet is used within definitions such as the definition for Rural Area and Rural Area Tier. Please define incorporated Hamlet vs Hamlet; or alternatively a suggestion would be to define and use only the term Hamlet and state the definition “As per the Municipal Government Act”.

3. Metropolitan Area (or Metropolitan Area Tier) – This definition should include and acknowledge portions of the Metropolitan Area (Tier) within counties and specialized municipalities not just cities and towns.

4. The terms Urban Community, Incorporated and Urban Community, Unincorporated are not used within the Growth Plan document itself. Reference to the Municipal Government Act may be sufficient to explain terms used in this document and also within The Act.

5. Please consider defining the term Redevelopment. It is a term that is used but not defined.
6. The definition for infill, urban being only on vacant lots should be revisited. Strathcona County, Edmonton, and St. Albert have all defined the term infill in a similar fashion but different from the term defined here:

Strathcona County: “refers to instances where the number of dwelling units increases on a lot.”
St. Albert: “is the process of developing vacant or underused parcels, or redeveloping existing or underused buildings, in an established neighbourhood.”
Edmonton: “Residential infill is the development of new housing in established neighbourhoods.”

7. Please consider defining the term Entertainment Use found throughout the document.

8. Please consider defining the term age-friendly found within Policies 3.1.3 and 3.1.4.

9. Residential Density, Low, Medium, High - consideration should be given to how these terms are currently defined by municipalities in the region, and how these definitions will affect urban municipalities and land use mix. To not limit housing mix and enable variation in housing opportunities, Strathcona County uses density ranges to define these terms. Also, consideration should be given to recent changes in the building code which may push the boundaries of four stories versus six stories as the distinction between medium and high density.

10. Freestanding Community - clarification is requested regarding this definition as it relates to the definition of urban community.

11. Fragmentation of Agricultural Lands is a defined term but not a term found within the document. Consideration should be given to defining only the term fragmentation (example - divided or separated into smaller pieces or parts) and providing clarification or context within the document (related to agriculture, environment or Greenfield) for ease of use.

Strathcona County would like to thank you again for the opportunity to provide comments on the draft Growth Plan 2.0. The purpose of our detailed review was to provide you with some constructive feedback in your final preparations of the Plan and we hope our comments are of assistance to you. Please feel free to contact us if clarification is needed regarding any of the comments in this letter. We look forward to your response and future discussions regarding the finalization of Growth Plan 2.0.

Sincerely,

[Signature]

Stacy Fedechko, RPP MCIP
Director, Planning and Development Services
Strathcona County
April 29, 2016

Sharon Shuya
Manager of Regional Projects and the Growth Plan Update
Capital Region Board
#1100 Bell Tower, 10104 — 103 Avenue
Edmonton, Alberta
T5J 0H8

Email to: sshuya@capitalregionboard.ab.ca

Subject: Draft One of Growth Plan 2.0 - Sturgeon County Comments

In the context of the April 13, 2016, Growth Plan Update Task Force meeting, I would like to share a summary of Sturgeon County’s comments and observations on Draft One of Growth Plan 2.0. While generally supportive of this initiative, we note the following:

Agriculture

- We note the recent meeting with member counties, the Board’s Chair, the City of Edmonton, and the Capital Region Board’s Chief Executive Officer, to begin the process of addressing concerns with the proposed agricultural policy area. We appreciate these efforts, and look forward to their result.

Economic Competitiveness and Employment

- We note that the Sturgeon Industrial Park and the Alberta’s Industrial Heartland, both designated as Major Employment Areas, reside outside of the Metropolitan Policy Tier. We request a clarification that the ability to develop these areas, or any other Major Employment Area that may fall outside of the Metropolitan Policy Tier, will not be affected by inclusion in the Rural Policy Tier.

- As noted during the April 13, 2016, Task Force meeting, we request that the Task Force include the current sand and gravel extraction areas nearby Villeneuve as resource extraction areas in the Edmonton Metropolitan Regional Structure map. For your reference, the Calahoo Villeneuve Sand and Gravel Area Structure Plan found at http://www.sturgeoncounty.ca/Services/PlanningDevelopment/AreaStructurePlans/tabid/193/Default.aspx, and please do not hesitate to contact Sturgeon County for more details.

- We appreciate the support for employment growth, the promotion of economic development, and job growth in relation to the Alberta’s Industrial Heartland Area, regional airports such as Villeneuve, agricultural producers, resource extraction companies and other industries in rural areas as noted in several portions of Draft One.
Natural Living Systems

- Upon review of the Schedule 6: Natural Living Systems, it appears that the Environmental Sensitive Areas for Sturgeon County incorporate element from both the County’s previous Municipal Development Plan (MDP) (1996) and its current MDP (2014) ESA delineation. Please incorporate only to the current MDP (20134) delineation, and do not hesitate to contact The County’s Community and Regional Planning Department for any additional clarification.

- We note that many of the environmental policies refer to existing Provincial and Federal Regulations, or are aspirational in tone. We suggest that there is an opportunity for the CRB to provide additional direction regarding the environment by developing policies, much like the policies incorporated or anticipated for the Agriculture Policy Area, for incorporation in the Natural Living Systems Policy Area (i.e. development of a Regional Environmental Master Plan and a Land Assessment tool).

- We suggest that policy 2.4.4 be expanded to a consideration of the items listed as well as “leading and emerging best practices” in terms of the use of renewable energy resources.

Integration of Land Use and Infrastructure

- We note the use of the phrase “growth hamlets” and suggest that the Task Force consider defining the phrase in the Glossary to differentiate a “growth hamlet” versus other hamlets, or removing the phrase. We also note that there are significant differences in real growth potential between various hamlets that might suggest having a range of density targets that are reasonable and achievable for all.

- Noted in the April 13, 2016 Task Force Meeting presentation (Defining Greenfield Areas – Page 23), Greenfield Area locations are not identified for the Hamlet example. Sturgeon County suggests that hamlets should have opportunities for Greenfield Growth, in keeping with the same criteria to the Towns and Villages within the Rural Area Tier.

- We note in the section entitled “Accommodating Growth in the Policy Tiers” that growth in rural areas will include accommodation through the “infill and build out of existing Country Residential areas.” We suggest that the Task Force consider adding encouraging “intensification” and the concept of “responsible growth” to the statement as another means of bring these developments in alignment with the overall regional densification goal and of enhancing their sustainability in a responsible manner.

- We request that the Sturgeon Valley be identified within Table 5 with density targets to be determined through the current work on the Sturgeon Valley Study Area.

- We recommend that the policies clearly articulate the role and responsibilities of the municipalities within each policy tier to address the question of whether, for example, the Counties have any role or responsibility in the planning and/or the development within the Metropolitan Area, and, if so, what that role might be.
Transportation Systems

- We request that the Task Force identify Highway 2 north of St. Albert, Ray Gibbon Drive, and transportation corridors associated with the Alberta’s Industrial Heartland as regionally significant transit corridors.

- We note that policy 5.2.1 speaks to encouraging a transportation modal shift away from individual automobile use. We caution that this policy may look different in a rural area and may, to provide an example, be more in the nature of park-and-ride centres. We also note that the Task Force may wish to list funding for rural transportation and transit through the province’s transit strategy (which is currently under development) as advocacy opportunities.

- We note that the potential for lifeline transportation is noted in rural areas. We appreciate the clarification that speaks to possibilities rather than an expectation or requirement. To clarify further, we recommend that the Task Force consider reviewing and removing the notional lifeline bus service lines on the Edmonton Metropolitan Regional Structure map where none exists today, and amending the table entitled “Regional Levels of Service” to by adding “where feasible,” or “as appropriate” to the mention of lifeline transportation services relating the Rural Policy Areas.

- In Section 5.4, the policies do not seem to address the statement for Objective 4. Policies in this section reflect access to the airport, and it is hard to determine how these policies will “Support EIA as northern Alberta’s primary air gateway to the world.” Sturgeon County suggests that the policies be rewritten to reflect this objective, or the objective is changed to reflect the policies.

- As noted in our comments following the CAO consultations, we suggest that there may be areas with poor soil conditions or topography that are unsuitable for supporting the agricultural industry or where the area that have been disturbed through commercial or other activity on which development may be reasonable and can be shown to be responsible growth as defined in plan’s Glossary. We note that this issue may be addressed through the development of the proposed Land Evaluation Site Assessment Tool.

General Comments

- As a municipality’s transportation and infrastructure plans should align with its Municipal Development Plan (MDP), and that the intent is that MDPs be aligned with Growth Plan 2.0 and submitted to the REF process, we recommend that there is a separate review of transportation, infrastructure plans is redundant, and that this requirement be removed from Growth Plan 2.0.

- We suggest that the proposed period for MDPs to be brought into compliance with Growth Plan 2.0 may not be practical given the anticipated need for the creation, approval, and implementation of the proposed Agriculture Master Plan and associated tools, as these elements will inform many member municipalities’ proposed amendments. For this reason, we suggest that the period to bring municipal MDPs into compliance with Growth Plan 2.0 begin upon the approval of the Agriculture Master Plan and associated tools.
• We appreciate the refinement related to the cost sharing of public investments for regionally significant infrastructure projects as now providing for the identification of regional infrastructure projects to assist communities seeking to participate in collaborative and coordinated funding.

• In terms of the current draft's definition of "growth," we suggest that the Task Force remove the reference to growth as being the consumption land for urban-style development and that consideration be given to broader aspects of growth such as economic and community development.

• Understanding that Growth Plan 2.0 is a work in progress, we suggest that the document is challenging to read and the framework is hard to interpret. The aspirational nature of the majority of the policies does not easily lead to measurable actions, which could render it difficult to determine how to implement the policies at a municipal planning level. Further, there are many cross-referenced (sometimes redundant) policies, objectives and statements, which demonstrate the plans completeness; however, Sturgeon County recommends that prior to the next submission, that the team spend some time considering the presentation of the document with an eye to making it more accessible and user friendly.

We would like to express our appreciation for the continued hard work and dedication to all those involved in this important initiative, and we look forward to its continuing success.

Sincerely,

Peter Tarnawsky
CAO

cc. Sturgeon County Council
May 3, 2016

Mr. Malcom Bruce
Chief Executive Officer
Capital Region Board
11000 Bell Tower
10104-103 Avenue
Edmonton AB T5J 0H8

Dear Mr. Bruce:

The Town of Stony Plain adds its concerns and questions regarding several areas of the proposed Growth Plan 2.0 update. In particular, the Town draws the Board’s attention to the following:

Minimum Density for Greenfield Development

Methodology
As already noted by the City of Fort Saskatchewan the Town concurs with the apparently unfounded rationale in determining the minimum density target of 50 du/ha. The Town is also unsatisfied with the response provided by the Board’s Technical Planning Committee. Our Administration’s review of planning documents for proposed Edmonton communities confirmed that the anticipated residential densities typically range between 30-40 du/ha, with just 2 exceptions. Further, a City of Edmonton initiated project, the community of Goodridge Corners, has a planned density of only 41.8 du/ha.

Hence, the Town of Stony Plain adds its request for clarification as to how 50 du/ha was determined to be a realistically achievable minimum to apply to all municipalities within the metropolitan area?

Implementation
As with most communities within the Metropolitan Region the proposed minimum density is double the Town’s existing target of 25-30 du/ha and is not realistic in the opinion of the Town. Updated statutory planning documents may establish a new – greater – minimum density, however, support from the Town’s existing community and Developers will be required for any implementation. The Town of Stony Plain supports the establishment of a new minimum density target; however, it must be realistic and attainable given our context within the Region.

Servicing
I agree that successful communities involve more than just establishing – and maintaining – a minimum density. Direction has not been given as to how the provision of services will be balanced with the proposed intensification (in reality greater than 100% for my community). In particular, as it relates to parks, recreation, and emergency services.

.../2
Additionally, the Town is concerned that such a significant increase in density may not be supported by the Town’s existing and planned physical infrastructure. It is unclear whether the Technical Planning Committee has considered the servicing aspects of the increased density and cost implications (either to construct or retrofit existing systems).

Consideration should be given to the existing regulatory framework and whether it allows municipalities – with their development partners – to properly service significantly denser residential communities.

Development of communities outside Metropolitan Area
The Town is also concerned that lower density targets in towns and hamlets may be more appealing to developers and builders. This may result in more new development within towns and hamlets, directing intended growth away from the metropolitan area.

Inadvertently directing more significant growth to towns and hamlets could result in demand for significant infrastructure requirements such as schools and health care services – outside of the Metropolitan areas. Given the associated inefficiencies, directing growth to major urban areas is ideal.

Intensification Target
The Town understands that Edmonton currently achieves an infill rate of 13%, which includes all new downtown development. While the 15% target may be too easily dismissed as aspirational it is an aggressive target and not likely to be achieved by our suburban members.

Redevelopment or infill development can be difficult to implement due to matters such as costs, market demands and lack of community support. As such, specific tools proposing potential changes to policy and districting (to achieve these infill targets) would be of assistance.

Agriculture
Section 6.2.3 establishes criteria which need to be satisfied in order to develop prime agricultural lands. The Town agrees that such lands need to be contiguous; however, we have concerns with the parallel requirements to meet population and employment forecasts. Given these are forecasted estimates the Town also requests that this section be reworded to provide greater flexibility.

While the Town supports discussions regarding the importance of agricultural land preservation, it should be balanced against the need to for continued responsible urban growth.

As this new Growth Plan will have significant implication for all municipalities in the Capital Region the Town seeks due regard for its comments and those from all members expressing similar concerns.

Sincerely,

Mayor William Choy

cc: Town of Stony Plain Council
    Tom Goulden, Town Manager, Town of Stony Plain
    Paul Hanlan, General Manager, Planning & Infrastructure
Summary of Municipal Feedback Prior to April 25, 2016

2016 Growth Plan

Sharon Shuya, Project Manager Capital Region Board
4/29/2016
The following table provides a summary of the comments and feedback received from Municipalities regarding the content under development for the 2016 Growth Plan from December 2015 – April 25, 2016. All municipalities have received a letter of acknowledgment and confirmation that the Task Force would be reviewing and considering the feedback as it works through the process of updating the 2010 Growth Plan. The original letters from each Municipality were provided to the Task Force on April 13, 2016. On April 13, 2016, the Task Force directed CRB Administration to prepare a summary of the themes contained in the letters, which is provided below along with a Status of the feedback.

<table>
<thead>
<tr>
<th>Date Received/ Municipality</th>
<th>Issues &amp; Concerns (Theme)</th>
<th>Response / and addressed in the Plan</th>
</tr>
</thead>
<tbody>
<tr>
<td>February 12, 2016</td>
<td>Land Supply Analysis – suggests the rural land need is exaggerated in their case.</td>
<td>Opportunity to address during Municipal Admin sessions in June</td>
</tr>
<tr>
<td>Sturgeon County</td>
<td>Land Supply Analysis – suggests the rural land need is exaggerated in their case.</td>
<td>Opportunity to address during Municipal Admin sessions in June</td>
</tr>
<tr>
<td></td>
<td>Metropolitan Structure – noted CFB inside Metro Area.</td>
<td>Addressed in Draft 1.0 - CFB is located within Rural Area on Metropolitan Structure – March 2016</td>
</tr>
<tr>
<td></td>
<td>Agricultural Working Paper – requested clarification as to why</td>
<td>The Consultants used information that was readily available as examples. The intent is to create the</td>
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<td></td>
<td>Sturgeon County and Lamont County were not included in CR Analysis.</td>
<td>true picture of the Ag sector for the region through a Regional Ag Master Plan</td>
</tr>
<tr>
<td></td>
<td>How the unique needs of Sturgeon Valley will be addressed.</td>
<td>Special Study Area created in January, Task Force is awaiting recommendations from Sturgeon County,</td>
</tr>
<tr>
<td></td>
<td>Compact and Contiguous Growth and how will demand for</td>
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<td></td>
<td>future urban land (for greenfield areas) be evaluated? Suggest Urbans need to</td>
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<td></td>
<td>demonstrate intensification of built-up areas prior to expanding into Ag Lands.</td>
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<td></td>
<td>Communities &amp; Housing expressed concern about being able to</td>
<td></td>
</tr>
<tr>
<td></td>
<td>achieve growth in the Hamlets.</td>
<td>Growth should be directed “growth” Hamlets and not all Hamlets</td>
</tr>
<tr>
<td></td>
<td>Concern about the lack of recognition of rural residential.</td>
<td>Addressed in Draft 1.0 – Land Evaluation &amp; Site Assessment Tool and Ag Master Plan to inform further</td>
</tr>
<tr>
<td></td>
<td></td>
<td>policy direction</td>
</tr>
<tr>
<td></td>
<td>Agriculture concern we are rushing into prescriptive Ag policies before we have</td>
<td>Addressed in Draft 1.0 –to prepare an Ag Master Plan to inform any policy direction. Counties are also</td>
</tr>
<tr>
<td></td>
<td>prepared an Ag Master Plan.</td>
<td>working with CRB Administration to prepare a Project Charter to ensure work can begin as soon as the</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Board approves the project terms of reference and budget</td>
</tr>
<tr>
<td></td>
<td>Transportation – concern that rural transportation needs are not</td>
<td>Addressed in Draft 1.0</td>
</tr>
<tr>
<td></td>
<td>addressed and wants clarification.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Economic Competiveness &amp; Employment – Location of Industry in the Rural – looking for</td>
<td>Addressed in Draft 1.0 – Land Evaluation and Site Assessment Tool and Ag Master Plan</td>
</tr>
<tr>
<td></td>
<td>clarification as to municipal role</td>
<td></td>
</tr>
</tbody>
</table>

Growth Plan Update Task Force
Page 49 of 106
<table>
<thead>
<tr>
<th>Date and Source</th>
<th>Feedback</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>April 7, 2016</td>
<td><strong>Regional Ag Master Plan</strong> – reiterated the importance of convening a meeting to start the process of creating a Regional Ag master Plan expressed concern about moving forward.</td>
<td>Addressed April 13, 2016 with initial meeting with the Counties and Edmonton and a commitment to prepare a Project Charter for the Board’s consideration by the time the 2016 Growth Plan is presented for approval.</td>
</tr>
<tr>
<td>Sturgeon County</td>
<td><strong>Country Residential</strong> - requests consideration for new CR be allowed in rural area with poorer soil conditions.</td>
<td>Task Force is discussing May 16th, 2016</td>
</tr>
<tr>
<td>April 13, 2016</td>
<td><strong>Expansion of Employment Areas</strong> – requests consideration for future contiguous expansion of designated major employment areas onto lower quality soils beyond the boundaries identified in Growth Plan 2.0.</td>
<td>Addressed in Draft 1.0</td>
</tr>
<tr>
<td></td>
<td><strong>Definition of infill of CR</strong> relating to existing CCRA’s should allow for subdivision as a means of intensification consistent with the overall regional goal.</td>
<td>Policy Direction is to continue with current targets of 129 lots per quarter section (CCRA) and 50 lots per quarter section for (Traditional CR)</td>
</tr>
<tr>
<td></td>
<td>Seeks clarification that the <strong>definition of fragmentation</strong> for lands which currently allows for smaller parcels to be created and retained for ag uses should not be considered ‘fragmentation. Need to provide clarity.</td>
<td>To be determined through Land Evaluation an Site Assessment Tool and Ag Master Plan</td>
</tr>
<tr>
<td></td>
<td><strong>Grandfathering of existing plans (ASP’s) and (IDP’s)</strong> – need to understand how municipalities address the possibility of Stat Plans being misaligned until MDP is updated and what impact any potential misalignment may have on conferred development rights.</td>
<td>Addressed in Draft 1.0 with the proposal of Regional Context Statements (under consideration by Task Force) See Legal Opinion dated April 21, 2016</td>
</tr>
<tr>
<td></td>
<td>Does not support <strong>Regional Context Statements</strong> (in 2 Years) if MDP’s are required to be updated in 3 years.</td>
<td>Task Force discussing May 16th, 2016</td>
</tr>
<tr>
<td></td>
<td>Does not support CRB reviewing <strong>municipal master plans</strong>, believe unnecessary, onerous and costly.</td>
<td>Task Force discussing May 16th, 2016</td>
</tr>
<tr>
<td></td>
<td>Suggest revising <strong>definition of growth</strong> to remove reference to consumption of rural lands for urban development. Believes growth can be accomplished in different ways including Densification and Intensification.</td>
<td>Addressed in Draft 2.0</td>
</tr>
<tr>
<td></td>
<td>Looking for clarification on ‘<strong>eco-industrial principles</strong>’ and how the principles are to be balanced with the need to locate heavy industrial away from large populations.</td>
<td>Addressed in Draft 2.0</td>
</tr>
<tr>
<td></td>
<td><strong>Clarification of life-line transit in rural areas</strong> to ensure the plan</td>
<td>Addressed in Draft 2.0 – Policy direction to reflect planning for life</td>
</tr>
<tr>
<td>Date</td>
<td>Location</td>
<td>Concern</td>
</tr>
<tr>
<td>----------------------</td>
<td>-------------------</td>
<td>--------------------------------------------------------------------------</td>
</tr>
<tr>
<td>February 17, 2016</td>
<td>Strathcona County</td>
<td><strong>Time frame for the Plan – 30 versus 50 years</strong></td>
</tr>
<tr>
<td></td>
<td></td>
<td><strong>Clarification regarding Country Residential Development</strong> – Will the existing zoned areas be permitted?</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Will all county residential now be 50 lots per quarter section instead of CCRA? What is the definition of ‘unsub divided’ as it would apply to an infill of existing CR?</td>
</tr>
<tr>
<td></td>
<td></td>
<td><strong>Clarification is required as to what is expected for servicing when we are encouraging growth of Hamlets?</strong></td>
</tr>
<tr>
<td></td>
<td></td>
<td><strong>Clarification is required between what is a rural center versus a Hamlet?</strong></td>
</tr>
<tr>
<td></td>
<td></td>
<td><strong>Clarification is required to support implementation of ‘complete communities’ when we reference “appropriate to the size and scale of community”</strong></td>
</tr>
<tr>
<td></td>
<td></td>
<td><strong>Implementation concern about how to address parking and infrastructure under compact complete communities. Looking for general guidance on how to address.</strong></td>
</tr>
<tr>
<td></td>
<td></td>
<td><strong>Development Expansion Area – looking for clarification as to the Standing of this MDP under Growth Plan 2.0.</strong></td>
</tr>
<tr>
<td></td>
<td></td>
<td><strong>Gap in the Plan regarding direction on Recreation Tourism in Rural Area.</strong></td>
</tr>
<tr>
<td>February 17, 2016</td>
<td>Leduc County</td>
<td><strong>Metropolitan Area – clarification as to the ‘extent of the area designated for Bremner growth node and looking for explanation as to why? And the future representation of Colchester as part of Metro Area?’</strong></td>
</tr>
<tr>
<td></td>
<td></td>
<td><strong>Land Supply Analysis from December 11, 2015 – wants to understand the assumptions supporting the analysis. Believes land consumption for Edmonton and Beaumont is higher than should be. (Slide 7)</strong></td>
</tr>
<tr>
<td></td>
<td></td>
<td>In the process of completing a Growth Study and believe the CRB analysis underestimates Leduc County’s growth. TBC once the Study is completed.</td>
</tr>
<tr>
<td></td>
<td></td>
<td><strong>EIA needs to be recognized as a major employment area and</strong></td>
</tr>
<tr>
<td>Consideration for plans for Aerotropolis.</td>
<td>Disagrees with adopting a <strong>REF like process for reviewing Infrastructure Plans.</strong></td>
<td>Addressed in Draft 1.0 – proposal to have CRB be added to the list of Stakeholders for review and comment only</td>
</tr>
<tr>
<td>Requests consideration be given to mandating of IDP’s to ensure Intermunicipal collaboration.</td>
<td><strong>Maximum Densities</strong> – consideration should be given to remove the notion of a maximum and suggest REF’s should be reviewed against regional infrastructure maps (which would address the problem).</td>
<td>Addressed in Draft 1.0 <strong>Greenfield Density Targets are presented as minimums with no ceiling</strong></td>
</tr>
<tr>
<td><strong>Employment Areas</strong> – policy should not be prescriptive, forecasts need to consider flexibility.</td>
<td><strong>Ag Lands</strong> – request no specific direction be taken until Ag Master plans – Leduc and Parkland are completed as well as the Regional Ag Master Plan. Any policies in the GP 2.0 need to ensure development and land and land conversion minimizes the impacts on productive ag lands.</td>
<td>Addressed in Draft 1.0</td>
</tr>
<tr>
<td></td>
<td>Check the definition of “urban community, unincorporated”.</td>
<td>Addressed Glossary to define “East Vistas”</td>
</tr>
<tr>
<td>Requests stronger language is needed ‘encouraging intensification is not good enough before urbans consider greenfield for development.</td>
<td>Does not support – no new CR as CR is important to housing choice.</td>
<td>Task Force discussing May 16&lt;sup&gt;th&lt;/sup&gt; 2016</td>
</tr>
<tr>
<td>Ag Policies – need to be stronger to put Ag Land on equal footing with other land use categories. Need to expand the criteria for premature conversion of Prime Ag Lands to include the impact on farming, the ag industry, and food supply chain. Also ties to regional Ag Master Plan that does not have a time frame.</td>
<td><strong>Greenfield Density Targets</strong> – need clarification on the methodology to determine proposed 50du/nrh within Metro Area.</td>
<td>Task Force discussing May 16&lt;sup&gt;th&lt;/sup&gt; 2016</td>
</tr>
<tr>
<td><strong>Greenfield Density Target Implementation</strong> – consideration needs to be given to phasing in of the target over time. Direction is needed as to how to address the provision of services to support the higher densities.</td>
<td><strong>Directing Growth to Hamlets</strong> – impact on infrastructure and</td>
<td>Task Force discussing May 16&lt;sup&gt;th&lt;/sup&gt; 2016</td>
</tr>
<tr>
<td>Feedback Request</td>
<td>Status / Details</td>
<td></td>
</tr>
<tr>
<td>---------------------------------------------------------------------------------</td>
<td>----------------------------------------------------------------------------------</td>
<td></td>
</tr>
<tr>
<td>Ensure growth does not create new towns, etc.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Intensification Targets</strong> – understand they are aspirational, but need details on how to implement; suggestions for tools and best practices would be helpful.</td>
<td>Under consideration for Draft 2.0</td>
<td></td>
</tr>
<tr>
<td><strong>AIH Buffer</strong> – needs to be left to the discretion of the Municipality, need to understand the implication for development - see schedule 7.</td>
<td>Consistent with 2010 Growth Plan</td>
<td></td>
</tr>
<tr>
<td><strong>Agriculture</strong> – looking for flexibility on the conversion of ag lands for development.</td>
<td>Addressed in Draft 1.0</td>
<td></td>
</tr>
<tr>
<td><strong>Regional road shows in June</strong> – clarification on intent?</td>
<td>Addressed in 1 on 1 meeting with the Mayor and Administration on May 2, 2016</td>
<td></td>
</tr>
</tbody>
</table>

End of Document
Agenda & Objectives

Task Force Direction on

1. Plan Targets
   - Greenfield
   - Intensification
   - Rural Growth

2. Metropolitan Regional Structure to 2044
   - Metropolitan Area delineation

3. Implementation Plan
   - Transition
   - Tools
   - Roles & Responsibilities
   - Resourcing
1. Plan Targets

- Greenfield Densities
- Intensification Targets
- Rural Growth
Plan Targets

What are we trying to achieve?

- Compact and responsible growth
  - Quality of place and good urban design
  - Increased transportation choice
  - Integration of use and development
- Anticipate the region of the future
  - Aging demographics
  - Housing diversity
- Targets are tools to achieve Principles and measure and monitor progress
Some support for the minimum greenfield residential density of 50 du/nrha within Metro Area

Concern raised whether increase to 50 du/nrha from current minimum densities of 25-30 du/nrha is achievable

Reconsider Metro Area’s single target for greenfield density with potential of a graduated approach across Metro Area

Interest in a transitional or stepped approach to targets

Concern about when and to what Targets would apply

Consider increasing proposed minimum of 25 du/nrha to 30 du/nrha for Morinville and Devon

Reconsider the application of intensification allocation and rural centres target to villages and hamlets

---

### Minimum Greenfield and Intensification Targets

**What We Heard:** Task Force Meeting & Directions

**Targets Presented to Taskforce April 13, 2016**

<table>
<thead>
<tr>
<th>Urban Communities by Tier</th>
<th>Minimum Greenfield Residential Density (du/nrha)</th>
<th>Intensification Allocation Target (% dwellings to Built-Up Areas)</th>
<th>TOD Centres Density Target (people+jobs/gha)</th>
<th>Urban/Rural Centres Density Target (du/nrha)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Metropolitan Core</td>
<td>n/a</td>
<td>100%</td>
<td>140-160</td>
<td>n/a</td>
</tr>
<tr>
<td>Metropolitan Area</td>
<td>≥ 50</td>
<td>varies</td>
<td>varies</td>
<td>varies</td>
</tr>
<tr>
<td>Edmonton</td>
<td></td>
<td>25%</td>
<td>140-160</td>
<td>n/a</td>
</tr>
<tr>
<td>St. Albert</td>
<td></td>
<td>17.5%</td>
<td></td>
<td>100</td>
</tr>
<tr>
<td>Sherwood Park</td>
<td></td>
<td>15%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Fort Saskatchewan</td>
<td></td>
<td>10%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Leduc</td>
<td></td>
<td>0%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Stony Plain</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Beaumont</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Spruce Grove</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Bremner/Colchester</td>
<td></td>
<td></td>
<td></td>
<td>75</td>
</tr>
<tr>
<td>East Vistas</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Rural Area</td>
<td>varies</td>
<td>varies</td>
<td>n/a</td>
<td>varies</td>
</tr>
<tr>
<td>Towns</td>
<td>≥ 25</td>
<td>varies</td>
<td>n/a</td>
<td>varies</td>
</tr>
<tr>
<td>Devon</td>
<td></td>
<td>7.5%</td>
<td></td>
<td>75</td>
</tr>
<tr>
<td>Morinville</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Calmar</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Lamont</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Bon Accord</td>
<td>≥ 25</td>
<td>n/a</td>
<td></td>
<td>50</td>
</tr>
<tr>
<td>Bruderheim</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Gibbons</td>
<td></td>
<td>5%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Legal</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Redwater</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Villages</td>
<td>≥ 20</td>
<td>5%</td>
<td>n/a</td>
<td>35</td>
</tr>
<tr>
<td>Growth Hamlets (tbd)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other Hamlets (tbd)</td>
<td>≥ 15</td>
<td>2.5%</td>
<td>n/a</td>
<td>25</td>
</tr>
</tbody>
</table>
How Minimum Greenfield Target Works

**Greenfield:** Area for future urban growth located outside of existing built-up areas of previously planned areas

- All new statutory plans for future urban areas will be required to meet minimum greenfield density targets.
- All existing statutory plans would be grandfathered at current approved densities.
- Any existing statutory plan that is amended should strive to have the amendment increase the plan’s overall planned density.
- Any existing statutory plans amended to include new urban areas (i.e., expanding plan to include an adjacent quarter section), will require the new portion of the plan to meet minimum greenfield density targets.
- New minimum density has considered current planned densities and requires all municipalities to be substantially more compact in future plans.
- Defined minimum density as well as policies which encourage longer term higher “aspirational” target.
- Ongoing monitoring will be key (planned and as built) to determine future targets at next GP Update.
## Recommended Greenfield Density Targets

<table>
<thead>
<tr>
<th>Urban Communities by Tier</th>
<th>Current CRGP Minimum Density (du/nrha)</th>
<th>Remaining Residential Land Supply (years)</th>
<th>Approved New/Major Amended Residential Plans since 2010*</th>
<th>RECOMMENDED Greenfield Density Targets</th>
<th>Alternative Greenfield Density Targets</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>Plan du/nrha du/nrha % change du/nrha % change</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Metropolitan Area</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Edmonton</td>
<td>30</td>
<td>30-40</td>
<td>Decoteau 34</td>
<td>50</td>
<td>47%</td>
</tr>
<tr>
<td>St. Albert</td>
<td>20-30</td>
<td>Range Road 260</td>
<td>38</td>
<td>45</td>
<td>18%</td>
</tr>
<tr>
<td>Strathcona County (urban)</td>
<td>≤ 10</td>
<td>Cambrian Crossing</td>
<td>33</td>
<td></td>
<td>36%</td>
</tr>
<tr>
<td>Leduc County (W of QE2)</td>
<td>unknown</td>
<td>n/a</td>
<td>n/a</td>
<td></td>
<td>n/a</td>
</tr>
<tr>
<td>Beaumont</td>
<td>&lt; 10</td>
<td>Beau Val Park/Beaumont Lakes (south expansion)</td>
<td>31</td>
<td>40</td>
<td>29%</td>
</tr>
<tr>
<td>Fort Saskatchewan</td>
<td>&lt; 13</td>
<td>Southfort</td>
<td>27</td>
<td>40</td>
<td>48%</td>
</tr>
<tr>
<td>Leduc</td>
<td>25-30</td>
<td>Brightwell</td>
<td>30</td>
<td>40</td>
<td>33%</td>
</tr>
<tr>
<td>Leduc County (E of QE2)</td>
<td>&gt; 30</td>
<td>East Vistas</td>
<td>27</td>
<td></td>
<td>48%</td>
</tr>
<tr>
<td>Spruce Grove</td>
<td>20-25</td>
<td>West</td>
<td>28</td>
<td></td>
<td>43%</td>
</tr>
<tr>
<td>Stony Plain</td>
<td>&gt; 30</td>
<td>Fairways North</td>
<td>26</td>
<td></td>
<td>54%</td>
</tr>
<tr>
<td>Rural Area</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Devon</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>30</td>
<td>n/a</td>
</tr>
<tr>
<td>Morinville</td>
<td>&gt; 30</td>
<td>two conceptual schemes</td>
<td>24</td>
<td></td>
<td>25%</td>
</tr>
<tr>
<td>Other Towns</td>
<td>&gt; 30</td>
<td>n/a</td>
<td>n/a</td>
<td>25</td>
<td>n/a</td>
</tr>
<tr>
<td>Villages and Growth Hamlets (tbd)</td>
<td>&gt; 30</td>
<td>n/a</td>
<td>n/a</td>
<td>20</td>
<td>n/a</td>
</tr>
<tr>
<td>Other Hamlets (tbd)</td>
<td>unknown</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
</tr>
</tbody>
</table>
What Greenfield Density Looks Like

Applying 30-40 du/nrha Greenfield Density, Leduc West ASP

![Graph showing percentage of dwelling types approved vs proposed densities.](image)

- **Low Density (20 du/ha)**
- **Medium Density (85 du/ha)**
- **High Density (200 du/ha)**

**Approved at 29 du/nrha**
- Low Density, Single Detached Housing
- Medium Density, Row Housing
- High Density, Low Rise Apartment

**Proposed at 35 du/nrha**
- Low Density, Single Detached Housing
- Medium Density, Low Rise Apartment
- High Density, Medium Rise Apartment

**Proposed at 40 du/nrha**
- Low Density, Single Detached Housing
- Medium Density, Medium Rise Apartment
- High Density, Medium Rise Apartment

Task Force Meeting: May 16, 2016

Growth Plan Update Task Force

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What Greenfield Density Looks Like

Applying 35-40 du/nrha Greenfield Density, Spruce Grove West ASP

<table>
<thead>
<tr>
<th>Dwelling Types</th>
<th>Approved at 29 du/nrha</th>
<th>Proposed at 35 du/nrha</th>
<th>Proposed at 40 du/nrha</th>
</tr>
</thead>
<tbody>
<tr>
<td>Low-Med Density (25du/ha)</td>
<td>80%</td>
<td>50%</td>
<td>40%</td>
</tr>
<tr>
<td>Med- Hi Density (90du/ha)</td>
<td>10%</td>
<td>50%</td>
<td>20%</td>
</tr>
</tbody>
</table>

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Growth Plan Update Task Force

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What Greenfield Density Looks Like

Applying 50 du/nrha Greenfield Density, Desrochers and Descoteau in Edmonton

![Graphs showing the percentage of dwelling types in Desrochers NSP and Descoteau ASP.](image)
Rural Growth
Rural Growth

What We Heard: Task Force Meeting & Directions

- Consider where Centres and intensification targets are applied in rural areas (villages?)
- Consider increasing the targets in Sub-Regional Centres
- Retain a density target for Country Residential (CR)
- Consider potential for new CR in some areas
- Need to be consistent in terms of ‘responsible growth’ across the region
- Need a mechanism to address regional issues in the appropriate context (Special Study Areas)
Country Residential Housing

- Supply is ample and demand is waning for country residential lots
- Total approx. 6,200 registered country residential lots in Parkland County alone (1975-2012)
  
  *Parkland County Community Scan & Analysis, 2015*

- 61% of country residential land *unabsorbed* (2009)

  *CRB, 2009 Regional Land Supply Analysis (previously unpublished)*
Status of Country Residential (CR) Land Supply by County

- Only ~230 ha unabsorbed lands between Sturgeon and Lamont, suggesting criteria-based approach to CR approvals
- High amounts of unabsorbed lands in Leduc and Parkland, suggesting pre-designation approach to CR approvals
- Strathcona County is nearing full build-out of its pre-designated lands
- **Conclusion:** amount of supply far exceeds recent demands at regional level, though not universal to all counties (Lamont, Sturgeon)

<table>
<thead>
<tr>
<th>County</th>
<th>Latest Available Known* Country Residential Land Supply (ha)</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Absorbed</td>
<td>Unabsorbed</td>
</tr>
<tr>
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<td>8,858</td>
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<td>3,014</td>
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<tr>
<td><strong>Total</strong></td>
<td>28,596</td>
<td>45,156</td>
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Country Residential

Recommendation:
- Maintain current draft policy: CR to be accommodated within existing zoned or land use permissions
  - Consistent with Principles and Objectives (compact development, responsible growth, minimize fragmentation and conversion of agriculture)
  - Decreased demand and significant supply at the regional level
  - Distinct circumstances such as Sturgeon Valley can be addressed through Special Study Areas

Alternative:
- Consider new CR through conditional provisions
  - Not before 90% built out of existing CR
  - Conservation of Prime Agricultural Land
  - Viable servicing
  - Subject to Board approval
Recommended Targets

- Refined minimum greenfield targets for Metro Area, Devon and Morinville
- Villages and Growth Hamlets have greenfield targets only, while no targets applied to Other Hamlets
- Intensification allocation target for Devon and Morinville increased to 10%
- Country residential maximum density of 50 units per quarter section

<table>
<thead>
<tr>
<th>Urban Communities by Tier</th>
<th>RECOMMENDED Minimum Greenfield Residential Density (du/nrha)</th>
<th>ASPIRATIONAL Intensification Allocation Target (% dwellings to Built-Up Areas)</th>
<th>ASPIRATIONAL TOD Centres Density Target (people+jobs/gha)</th>
<th>ASPIRATIONAL Urban/Rural Centres Density Target (du/nrha)</th>
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<tr>
<td>Metropolitan Core</td>
<td>n/a</td>
<td>100%</td>
<td>140-160</td>
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<tr>
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<tr>
<td>St. Albert</td>
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<td>Strathcona County (urban)</td>
<td>45</td>
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<td>30</td>
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<td>Bruderheim</td>
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<td>Villages</td>
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<td>Other Hamlets (tbd)</td>
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</table>
Discussion and Questions

Targets and Rural Growth

- Do you agree with recommended targets (Greenfield, Intensification, Centres)?
- Do you agree with Country Residential Densities?
- Do you agree with recommended policy approach to new Country Residential?
- What other considerations/refinements need to be undertaken?
2. Metropolitan Regional Structure to 2044

-Delineation of the Metropolitan Area
Metropolitan Area

What We Heard: Task Force Meeting & Directions from April 13th Discussion

- Support for Metropolitan Area delineation to reflect compact development patterns, consistent with the approach to the GP 2.0 Update Vision, Principles, Objectives and Policies
- Need consistency in terms of illustrating compact development pattern; if one PGA gets to be shown, they all should be considered
- Reconcile growth nodes of Bremner and Colchester against County Council decision
- Discussion on Bremner:
  - Bremner should be shown as the full PGA
  - Bremner should be shown to reflect the Bremner Growth Strategy (area required to accommodate growth to 2044)
- Confirmation that the Metropolitan Structure tiers/lines are policy lines not growth boundaries
- Need for policy to reinforce that Metropolitan Area line would not preclude growth beyond Metropolitan Area; Need for appropriate process and criteria to consider extending Metropolitan Area line in the future
- Discussion that Metropolitan Area line would be reviewed at the next Growth Plan Update and can be refined at that time
Metropolitan Area

Planning Considerations to determine Metropolitan Area

- Consistent with the Growth Plan Vision, Guiding Principles and Objectives
- Ensure all municipalities are treated fairly and have ability to grow in a responsible manner
- Consistent and align with GP 2.0 approach and determined land need
- Addition of clear articulation that Metropolitan Area may be updated and provide flexibility for future growth and reflect outcomes from Agriculture Master Plan – (policies added)
- Metropolitan Structure tiers/lines are policy lines not growth boundaries
- Outcome of requested legal opinion: legal rights for development are only granted through zoning not PGAs
Project Team’s Recommendation:
Metropolitan Area to reflect compact development pattern to 2044

The size and shape of the Metropolitan Area will be updated following Strathcona County’s approval of the Bremner Area Concept Plan.
Discussion and Questions

Metropolitan Area

- Does the Task Force agree with the Project Team’s recommendation of the delineation of the Metropolitan Area? (Slide 21)
- If no, what planning considerations require further discussion?
3. Implementation Plan –

- Transitioning from existing to new Growth Plan
- Implementation Tools
- Roles and Responsibilities
Implementation

Desired Outcomes

1. Clarity on the transition between the existing and new Growth Plan
2. Understanding of the recommended tools and actions to implement the Growth Plan Principles, Objectives and Policies
3. Recommendations from the Task Force on the above
Transitioning from existing to new Growth Plan

- Existing Statutory Plans
- Municipal Development Plans
- Regional Context Statements
Existing Statutory Plans (other than MDPs)

Recommendation:
That the CRB recommend to the Province that Statutory Plans (other than MDPs) in effect at the time that the Growth Plan is adopted by the Province are grandfathered.

Rationale:
- Same approach to existing Growth Plan (Sections 19(5) and 23 of the CRB Regulation)

Notes:
- The evaluation of amendments to existing statutory plans would look for movement towards achieving Principles, Objectives and Policies of the Growth Plan
Regional Context Statements

What is a Regional Context Statement?

- Analysis of current MDPs against the Principles, Objectives and Policies of the Growth Plan
- Documentation of where MDPs align, and where future changes are required to be brought into conformance
- Indication of how the MDP will be brought into conformity within three years, where conformance does not currently exist
- Example provided - Victoria, B.C.
Regional Context Statements

Recommendation:
That Members submit a Regional Context Statement to the CRB for information within one year of the Growth Plan being adopted by the Province

Rationale:
- Identify where member MDPs conform with the Growth Plan, and where future changes are required
- Recognition that MDPs are the primary mechanism for municipalities to implement of the Growth Plan

Notes:
- Regional Context Statements would be adopted through Resolution by Council
- Would not apply to Members under 3,500 population without an approved MDP
Municipal Development Plans

Recommendation:
That the CRB recommend to the Province that conformance to the Growth Plan through MDPs must be achieved within three years of the adoption of the Growth Plan by the Province

Rationale:
- Recognition that MDPs are the primary mechanism for municipalities to implement the Growth Plan
- Critical to the success of Growth Plan
Municipal Development Plans

Notes:

• Section 19 of Regulation establishes the framework for conformance of all statutory plans to the Growth Plan. The above recommendation applies to MDPs only.

• Would not apply to Members under 3,500 population without an approved MDP

• Conformance can be achieved through updates or new MDPs
Discussion and Questions

Transition from existing to new Growth Plan

Is the recommended approach to transition reasonable?

- Existing statutory plans
- Regional Context Statements
- Municipal Development Plans
Implementation Tools

REF

- Non-statutory plans
- Referral of Master Plans
- Amendments to the Growth Plan
- Updates to the Growth Plan
- Monitoring and Reporting
Regional Evaluation Framework

Recommendation:

- That recommendations to the Province for amending REF reflect the following:
  - Overall intent of REF remains the same
  - **Submission criteria** are improved to extend screening of regionally significant amendments to MDPs and IDPs
  - **Evaluation criteria** reflect the Principles, Objectives and the embedded Policies of the new Growth Plan
  - **Evaluation criteria** reflect measurable targets (e.g. minimum greenfield densities and aspirational targets)
  - **Redundancies** in the evaluation criteria **are removed**
  - Clarity that the *role of population and employment forecasts* are a tool, **not an evaluation criteria**
Regional Evaluation Framework

Rationale:

- REF is the mechanism to evaluate the implementation of the Growth Plan through statutory plans (Section 20 of the Regulation)
- There is room for improvement to determine which plans, and amendments are regionally significant
- Address concerns raised by Members (e.g. forecasts)
- There are redundancies in the evaluation criteria (evaluation against Section 11 of the Regulation) that can improve the evaluation process

Notes:

- REF is adopted through Ministerial Order by the Province
- CRB can only provide recommendations on amendments to REF
Non-statutory plans

Recommendation:
That the CRB recommend to the Province that future growth within the Region be accommodated through statutory plans or conceptual schemes for all Members, as part of the MGA review

Rationale:
- Since REF only applies to statutory plans (Section 20 of the Regulation), they are the only mechanisms by which the CRB can evaluate the implementation of Principles, Objectives and Policies of the Growth Plan
- Addresses concerns with respect to the use of non-statutory planning documents (e.g. Outline Plans) to accommodate growth
Referral of Master Plans

Recommendation:
That Members include the CRB in the circulation of draft Master Plans (Transportation Master Plans and Agriculture Master Plans) for comment.

Rationale:
- Ensures integration of land use and infrastructure
- Implements (in part) Section 17 of the Regulation

Notes:
- Circulation is not for approval, CRB administration will respond with comments by letter
Amendments to the Growth Plan

Recommendation:
Not required.

Rationale:
- Enabling procedure currently exists within the CRB Regulation

Notes:
- Bylaws to enable amendments have not been enacted by the CRB to-date
Recommendation:
That the CRB conduct an interim 5-year review of the Growth Plan

Rationale:
• Reflect any significant changes to Plan Maps and Schedules
• Integrate outcomes of CRB work items (e.g. Agriculture Master Plan, updates to IRTMP)
• Reflect emerging information from monitoring

Notes:
• Based on available census (federal and municipal) data
• Review and update population and employment forecasts
• Analyze outcomes of annual monitoring and the effects to the Plan
Recommendation:
That a comprehensive review of the Growth Plan be undertaken every 10 years, with work beginning at the 8-year mark

Rationale:
- Formal review cycle enables the Board to develop appropriate work plans and budget cycles
- Evolution of policy framework to reflect changes in growth patterns, economy, outcomes of the Growth Plan

Notes:
- Terms of Reference for comprehensive review would be determined by the Board
Monitoring and Reporting:

Recommendation:
That the CRB produce an annual monitoring report, and that data from Members be in a standard format.

Rationale:
- Standard set of indicators and format will improve analysis and understanding of growth within the Region
- Regular reporting to track progress will enable a data base to be built that will inform outcomes of Growth Plan
- Emerging trends can be identified

Notes:
- CRB Regulation establishes requirement for Members to provide data
- CRB will determine list of indicators consistent for all Members
- List of indicators is under development
Discussion and Questions
Implementation of the Growth Plan

Is the recommended approach to implementation tools reasonable?

• REF
• Non-statutory plans
• Amendments to the Growth Plan
• Updates to the Growth Plan
• Monitoring and Reporting
Roles and Responsibilities

- CRB
- Member Municipalities
- Government of Alberta
- Resourcing Plan
Role and Responsibilities
Capital Region Board

- Review statutory plans submitted under REF
- Review and receive Regional Context Statements as information
- Provide comment on Transportation Master Plans
- Produce annual monitoring report
- Work plan and budgeting for interim and comprehensive reviews
- Facilitate future work items including, but not limited to:
  - Agriculture Master Plan
  - Updates to IRTMP
  - Regional Housing Plan
- Collaborate with stakeholders and advocate for Regional priorities related to Objectives of the Growth Plan
Role and Responsibilities
Member municipalities

✓ Submit Regional Context Statement
✓ Update Municipal Development Plan
✓ Implement Growth Plan Principles, Objectives and Policies through statutory plans and Master Plans
✓ Submit relevant statutory plans and amendments for review under REF
✓ Refer Transportation Master Plans to CRB for comment
✓ Submit data on indicators
✓ Define built-up urban areas, centres, growth hamlets and staging of greenfield areas
Role and Responsibilities
Government of Alberta

✓ Consider recommendations submitted by the CRB (e.g. amendments to the Capital Region Board Regulation and REF)

✓ Collaborate with the CRB on implementation of the Growth Plan Principles, Objectives and Policies

✓ Support regional agriculture, infrastructure, transportation and housing priorities, and outcomes of future work (e.g. Agriculture Master Plan)

✓ Consider Growth Plan policy framework when planning investments and funding, including but not limited to:
  ▪ Transportation
  ▪ Health
  ▪ Education
  ▪ Cultural amenities
  ▪ Housing
Resources to Implement the Growth Plan

- In this Growth Plan review there is a need to identify the resources required to implement the GP 2.0
- CRB to collaborate and advocate with Member Municipalities to address these resource requirements
## Resources to Implement the Growth Plan

<table>
<thead>
<tr>
<th>Deliverable</th>
<th>Responsibility</th>
<th>Existing or New Responsibility</th>
<th>Resource Magnitude</th>
<th>Expected Timing</th>
<th>Anticipated Funding Source</th>
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<td>CRB</td>
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<td>Major</td>
<td>&gt;2 Year</td>
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<td>Minor to moderate</td>
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</table>
What will happen after the Plan is adopted by the Board?

Plan Approved by Board October 2016

Plan adopted by Province in 2017

Municipalities to prepare Regional Context Statements within 1 year to express how MDP conforms to GP or will be brought into conformity within years

Annual Monitoring of Plan

MDPs to be updated within 3 years

Interim Review of Growth Plan at 5 Years

GP Update every 10 years (starting in 8 years)
**Task Force Motion**

**Recommended Motion:**
That the Growth Plan Update Task Force endorse the direction of the policies for the Greenfield Density Targets, Rural Growth and Metropolitan Structure to inform Draft 2.0 of the Growth Plan.
**Task Force Motion**

**Recommended Motion:**
That the Growth Plan Update Task Force endorse the draft Implementation Plan to inform Draft 2.0 of the Growth Plan.
April 21, 2016

Attention: Leslie Chivers

Capital Region Board
1100 Bell Tower
10104-103 Avenue
Edmonton, AB T5J 0H8

Dear Sir:

Re: Impact of New CRB Growth Plan

This letter follows our phone discussion on April 19, 2016. You have asked that we confirm our opinion regarding the legal status of a new CRB Growth Plan once approved by the Minister. This question arises in the context of municipalities which have prepared new statutory plans or amended statutory plans to bring the plans into compliance with the present CRB Growth Plan. It is possible that the new Growth Plan will revise the provisions applicable to some lands, with the result that existing statutory plans are not consistent with the new Growth Plan. Those revisions could have the impact of requiring downzoning of lands, with the result that the Lands would have less development potential than under the current CRB Growth Plan.

The MGA provides that the Growth Plan once approved, prevails over statutory plans and bylaws to the extent of any conflict or inconsistency. If the land use potential of certain lands is reduced by reason of the new Growth Plan the provisions in the new Growth Plan would prevail. The exception to this would be if a landowner has obtained subdivision approval or a development permit in accordance with the plans and bylaws in place prior to the approval of the new Growth Plan.

Provisions of Part 17.1 of the MGA and in the Capital Region Board Regulation are intended to preclude any claim or cause of action being advanced by reason of anything done pursuant to the approval of the Growth Plan by the Minister.

The sections in the Act that are relevant to the question you raise are Sections 708.13, 708.19, 708.2, 708.21, 708.22. These provisions specify that no cause of action, nor claim for compensation arises by anything done in accordance with Part 17.01 of the Act. Section 708.22
specifies that nothing done in accordance with Part 17.1 constitutes an expropriation or injurious affection for the purposes of the Expropriation Act or otherwise. This provision is specifically directed at statutorily removing any basis for a claim for loss of value caused by the implementation of the provisions of a Growth Plan by member municipalities.

Section 27 and 28 in the CRB Regulation contain similar provisions.

In addition, Section 654(3) makes clear there is no right to obtain subdivision approval. It is always discretionary.

The type of restrictions on land use that could arise by reason of the provisions in the revised Growth Plan have been viewed by the Courts as land use restrictions, which by their nature are discriminatory in the treatment of various parcels of land and which do not give rise to claims for compensation by reason of down zoning or loss of potential future development options. The Alberta Courts gave consideration to restrictive land use provisions when the Alberta Government imposed the Restricted Development Areas around Calgary and Edmonton in the early 1980’s for the purpose of protecting the lands which are now the Anthony Henday Drive and Stony Trail. The Court found that such land use regulation enacted by a government or municipality acting within its jurisdiction and in good faith, does not give rise to a right to compensation. The provisions in the MGA and the CRB Regulation reinforce this interpretation. (We do note that in the case of the lands restricted by the RDA legislation, the province eventually had to buy the land—that type of issue does not arise in the case of the CRB Growth Plan.)

As long as the Growth Plan and therefor the applicable land use bylaw provides for at least one use that can be made of land, such as the existing use, the planning regime that so restricts the use would, in our opinion, not be open to successful challenge by a landowner. Nor would it give rise to any valid cause of action or claim for compensation for such a landowner.

Yours truly,

REYNOLDS MIRTH RICHARDS & FARMER LLP

PER:

SHEILA MCNAUGHTAN, Q.C.
SCM/mln

1600882
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<th>MDP Bylaw No.</th>
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<th>Date of Last Amendment</th>
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</tr>
<tr>
<td>Spruce Grove</td>
<td>C-711-09</td>
<td>July 12, 2010</td>
<td>February 22, 2016</td>
<td>10 years</td>
<td>Minor update underway</td>
</tr>
<tr>
<td>St. Albert</td>
<td>15/2007</td>
<td>2007 or 2008</td>
<td>March 21, 2016</td>
<td>5 years</td>
<td></td>
</tr>
<tr>
<td>Stony Plain</td>
<td>2489/D&amp;P/13</td>
<td>March 10, 2014</td>
<td></td>
<td>5 years</td>
<td></td>
</tr>
<tr>
<td>Strathcona County</td>
<td>1-2007</td>
<td>May 22, 2007</td>
<td>November 5, 2015</td>
<td>5 years</td>
<td>Underway</td>
</tr>
<tr>
<td>Sturgeon County</td>
<td>1313/13</td>
<td>April 22, 2014</td>
<td></td>
<td>5 years</td>
<td>2019</td>
</tr>
<tr>
<td>Thorsby</td>
<td>exists but old (bylaw no. and dates of adoption and latest amendment are unknown)</td>
<td></td>
<td></td>
<td></td>
<td>Currently considering MDP update</td>
</tr>
<tr>
<td>Wabamun</td>
<td>06-2010</td>
<td>May, 2010</td>
<td>2011</td>
<td>5 years</td>
<td></td>
</tr>
<tr>
<td>Warburg</td>
<td>94/09</td>
<td>October, 2009</td>
<td></td>
<td>3 years</td>
<td></td>
</tr>
</tbody>
</table>