

TOWN OF COCHRANE

101 RancheHouse Rd.
Cochrane, AB T4C 2K8
P: 403-851-2500 F: 403-932-6032
www.cochrane.ca



August 20, 2019

Attention: Liisa Tipman

Calgary Metropolitan Region Board
Suite 305, 602 - 11 Avenue SW
Calgary, AB T2R 1J8
ltipman@calgarymetroregion.ca

Re: Town of Cochrane Response to CMRB IREF Application 2019-03 – Rocky View County

Dear Ms. Tipman,

The Town of Cochrane (Cochrane) has reviewed Rocky View County amendments to their Municipal Development Plan (County Plan), the Calgary Metropolitan Region Board (CMRB) Interim Regional Evaluation Framework (IREF) report and the City of Calgary's challenge to IREF 2019-03. Upon the review of these documents, Cochrane has significant concerns with the amendments proposed and their implications to the regional planning process currently being undertaken by the CMRB and its members. As such, Cochrane would like to confirm its support for the City of Calgary's challenge.

Cochrane appreciates the desire of CMRB municipalities to proceed with planning initiatives in advance of the completion of the Growth Plan. However, we recognize that all development proposals must ultimately comply with the requirements of the Growth Plan, once complete.

Understanding that Rocky View County is scheduled to complete a comprehensive review and update of their County Plan in 2020, we feel that the proposed amendments are premature and should be completed within the scope of the larger project, not in isolation with limited opportunity to evaluate and understand the impact upon the Calgary region and the Town of Cochrane. These concerns are reflected in the CMRB Administration report which states *'the ability to review IREF 2019-03 in terms of its impact on the principles, objectives and policies of the IGP and IREF is limited.'*

While the IGP and IREF provide an interim framework to evaluate proposed amendments such as IREF 2019-03, it is understood that these documents will be refined through the Growth Plan process in accordance with the CMRB regulation. This regulation requires a comprehensive, integrated regional land use plan that includes the identification of growth areas, density and other requirements that may alter the policies around location, scale and type of growth and development in the Calgary region. Until such time as this is complete, Cochrane believes amendments of this nature are premature.

The Town of Cochrane also remains concerned that Rocky View County appears to be trying to establish a policy framework to allow for business development outside of previously established Area Structure Plan (ASP) boundaries in advance of the completion of the Growth Plan. Not only is this also premature, the use of technical studies and levies does not address the overall impact of growth and development within the adjacent ASP area to the same extent as an ASP amendment.

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It is important to note that planning through statutory plans has already been established in the CMRB Regulation, the IGP and IREF as an important mechanism to implement the principles, objectives and policies of the Region. The proposed amendments allow the County to approve business development and significant growth in the absence of an ASP or ASP amendment process, where regional partners will not be provided an opportunity for input or to evaluate the impacts upon their communities or the region. This directly circumvents the regional planning process and is not in keeping with the goals and objectives of the CMRB and its membership.

According to Section 3.2.2 of the Interim Growth Plan, *'municipalities should collaborate planning for land-use, infrastructure, and service provision with other member municipalities, where appropriate.'* The County circulated the proposed amendments to Cochrane and subsequently met following the receipt of a letter of concern on April 26, 2019. Following a meeting between the Town of Cochrane and Rocky View County on May 13, 2019, the County made no efforts to address the concerns raised, provide justification for the proposed amendments, or explore collaborative solutions to these issues.

Cochrane provided Rocky View County with a second letter on May 31, 2019, outlining our outstanding concerns and requested that this matter be brought to the next Intermunicipal Committee (IMC) meeting in accordance with the provisions of the RancheHouse Accord, an established dispute resolution process between the Town of Cochrane and Rocky View County. This request was not acknowledged by the County and their proposed amendments to the County Plan were subsequently approved the day prior to the scheduled IMC meeting.

Cochrane does not believe this is in keeping with the spirit and intent of the IGP, nor Section 3.2.2 which states that *'as a requirement, member municipalities shall demonstrate collaboration to coordinate through various mechanisms,'* including dispute resolution protocols.

In closing, the Town of Cochrane remains committed to the CMRB Growth Plan process and collaborating with our regional partners to ensure a strong and healthy Calgary region. Therefore, Cochrane supports the City of Calgary's challenge to IREF 2019-03 as the proposed amendments to the Rocky View County Plan are premature and will have significant implications to the regional planning process currently underway.

In the spirit of collaboration, Cochrane also recommends the CMRB Board direct CMRB Administration to review and evaluate the policy gaps identified through the consideration of these proposed amendments by Rocky View County and that these gaps be formally addressed through the following:

1. Discourage amendments to individual Municipal Development Plans prior to the completion and adoption of the finalized Regional Growth Plan for the Calgary Metropolitan Region.
2. Ensure that the finalized Growth Plan and Regional Evaluation Framework clarifies the type, amount, location and scale of development that may occur adjacent to, or outside of, the boundaries of an Area Structure Plan. Proposals for business development outside of established Area Structure Plan areas should be discouraged prior to the completion of a finalized Growth Plan.
3. Establish new requirements for more robust and meaningful engagement outcomes between member municipalities prior to IREF applications being submitted to the CMRB for formal consideration.

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Cochrane remains committed to the purpose and intent of the Calgary Metropolitan Regional Board to develop a long-term plan for managed, sustainable growth in the Calgary Region through collaborative relationships.

Regards,

A handwritten signature in black ink, appearing to read "Jeff Genung". The signature is stylized and fluid.

Mayor Jeff Genung
Town of Cochrane

cc

Chris Sheard, Board Chair, CMRB
Town of Cochrane Council
Dave Devana, CAO
Suzanne Gaida, Deputy CAO
CMRB Mayors and Reeves