

Regional Evaluation Framework (REF)

CMRB Administration Recommendation

Member Municipality	Foothills County
Application Name	Heritage Crossing ASP, Heritage Pointe Hamlet Growth Area, and Hamlet Growth Area Expansion
REF Application Number	2024-02
Type of Application	Area Structure Plan, Hamlet Growth Area, and Hamlet Growth Area Expansion
Municipal Bylaw #	34/2023
Date Application Circulated	March 27, 2024
Date of CMRB Administration Recommendation	April 26, 2024

CMRB Recommendation

That the Board **REFUSE** REF Application 2024-02, the Foothills County

- designation of the Hamlet of Heritage Pointe as a Hamlet Growth Area,
- approval of the proposed Heritage Crossing Area Structure Plan (ASP) as a Masterplan Community and Residential Community, and
- expansion to a Hamlet Growth Area necessary to accommodate the Heritage Crossing Area Structure Plan.

- REF Application 2024-02 is for a new Area Structure Plan in Foothills County, the Heritage Crossing Area Structure Plan (Heritage Crossing ASP). The Heritage Crossing ASP would allow for the development of a maximum of 163 units on approximately 36 acres of net developable lands. The development in the Heritage Crossing ASP would include a fully serviced residential neighbourhood with a variety of housing forms intended to integrate into the existing hamlet of Heritage Pointe.
- The proposed ASP includes the connection and expansion of existing Heritage Pointe piped water and wastewater services consistent with Preferred Growth Areas policies 3.1.3.1 to make "efficient and cost-effective use of existing and planned infrastructure."
- As part of REF 2024-02, Foothills County proposes to identify the hamlet of Heritage Pointe as a Hamlet Growth Area (a Preferred Growth Area) and expand the Hamlet Growth Area to include the proposed Heritage Crossing ASP area. This would facilitate the development of the proposed Heritage Crossing ASP.
- CMRB Administration finds that identifying Heritage Pointe as a Hamlet Growth Area is not consistent with Growth Plan policy 3.1.8.5. a) and e) and is therefore not consistent with the Growth Plan.

3.1.8.5.a) The proposed boundary of the Hamlet Growth Area boundary is contiguous with the boundary of the City of Calgary.

3.1.8.5 e) The proposed Hamlet Growth Area is an existing built area and larger than 260 ha.

- CMRB Administration finds that the Masterplan Communities Placetype proposed in REF 2024-02 is not consistent with the Growth Plan's Preferred Placetypes policy 3.1.2.1 e) and the Growth Plan definition of the Masterplan Community Placetype. The proposed ASP as presented does not include access to the local services, neighbourhood amenities, and commercial uses that characterize Masterplan Community, which is defined as "a Greenfield Development characterized by its comprehensive and integrated approach to land use" (Growth Plan Glossary, page 96-97). Because REF 2024-02 does not clearly identify how the proposed ASP would integrate with the existing community of Heritage Pointe and potential additional future growth areas (if applicable) to create a complete community, REF Application 2024-02 is not consistent with Growth Plan policy 3.1.2.1 e) or the definition of Masterplan Community.
- Similarly, CMRB Administration finds that the application is not consistent with Growth Plan policy 3.1.8.3 b) which provides requirements for future growth located in Hamlet Growth Areas. The proposed Heritage Crossing ASP, which has been identified as the only future growth in the Hamlet Growth Area, does not "identify a mainstreet or mixed use node where employment and mixed use development will be focused" as required in Growth Plan policy 3.1.8.3 b). Because REF Application 2024-02 does not clearly identify how the proposed Hamlet Growth Area as a whole, including future growth areas, would address these policies, REF Application 2024-02 is not consistent with Growth Plan policy 3.1.8.3.b).
- The third party consultant review, completed by Lovatt Planning Consultants found the application to be inconsistent with the Growth Plan.
- CMRB Administration finds REF Application 2024-02 to be inconsistent with policies of the Growth Plan and recommends the application for refusal.

Attachment

- Third Party Review, Lovatt Planning Consultants

1.0 Background

Foothills County has submitted a Regional Evaluation Framework (REF) application for the Proposed Heritage Crossing ASP. As part of REF Application 2024-02, Foothills County is proposing to identify Heritage Pointe as a Hamlet Growth Area (a Preferred Growth Area) and expand the Hamlet Growth Area to include the proposed Heritage Crossing ASP.

The proposed Heritage Crossing ASP, Bylaw 34/2023, was submitted to the CMRB through REF submission criteria 4.1 (c) which requires municipalities to refer to the Board all new Area Structure Plans and Area Redevelopment Plans. The Heritage Crossing ASP would allow for the development of a maximum of 163 units on approximately 36 acres of net developable lands. The proposed development in the Heritage Crossing ASP would include a fully serviced residential neighbourhood with a variety of housing forms that integrate into the existing Hamlet of Heritage Pointe.

CMRB Administration notified CMRB members of REF Application 2024-02 on March 27, 2024.

2.0 Consistency with the Growth Plan

2.1 Third Party Review

CMRB Administration retained Lovatt Planning Consultants to evaluate the application with respect to the REF requirements. The third party review evaluated REF Application 2024-02 in relation to the goals, objectives, and policies of the Growth Plan. Lovatt Planning Consultants found REF Application 2024-02 to be inconsistent with the Growth Plan. The attached third party review provides an overview of the consistency of REF Application 2024-02 with all Growth Plan policies.

2.2 CMRB Administration Review

In consideration of the Foothills County REF submission and the third party review, and in consideration of its own review of REF Application 2024-02 materials, CMRB Administration finds REF Application 2024-02 to be inconsistent with the goals, objectives, and policies of the Growth Plan. CMRB Administration notes that the lack of integration between the planning concepts for the Heritage Crossing ASP, the Heritage Pointe Hamlet Growth Area, and additional future growth beyond the proposed ASP (if applicable) makes it difficult to review the application as one community under the policies of the Growth Plan. As a result, CMRB Administration was not able to adequately review some policies related to placetypes, complete communities, and requirements for Hamlet Growth Areas. These areas are noted below.

3.0 REF Application 2024-02 Overview

The following provides an overview of key Growth Plan policies applicable to this REF application. See the attached third party review report for an overview of the consistency of REF Application 2024-02 with all Growth Plan policies.

3.1 Heritage Pointe Hamlet Growth Area (Preferred Growth Area)

REF Application 2024-02 proposes to identify Heritage Pointe as a Hamlet Growth Area, which is a Preferred Growth Area. The supporting rationale for establishing Heritage Pointe as a Preferred Growth Area was provided by the application in the [REF Application 2024-02 Growth Plan Alignment Statement](#). No additional mapping, planning concepts, or similar documentation was provided in support of the Hamlet Growth Area application.

Growth Plan policy 3.1.8.5 states that: "*Rural municipalities may propose new Hamlet Growth Areas. When evaluating the merits of creating a new Hamlet Growth Area the Board must consider how the proposed Hamlet Growth Area:*

- a) *is not contiguous to an Urban Municipality, with a recommended minimum distance from the existing boundary of an Urban Municipality of two kilometres;*
- b) *has potential for urban-style development of the Preferred Placetypes and Employment Areas;*
- c) *has existing or planned services of water, wastewater and/or Stormwater servicing with a preference for the potential for full municipal servicing;*
- d) *has access to existing major transportation networks;*
- e) *has a land area of 260 hectares (640 acres) or less;*
- f) *has an existing main street or potential for a main street, or mixed-use node where employment and mixed-use developments can be focused;*
- g) *may have an existing urban or Hamlet development pattern; and*
- h) *is necessary to meet established growth pressure and market demand."*

Upon review of the information provided, REF Application 2024-02 is not consistent with Growth Plan policy 3.1.8.5. a) and e). Heritage Pointe is contiguous with the City of Calgary boundary and is therefore not consistent with Growth Plan policy 3.1.8.5 a). As noted in REF Application 2024-02, "the existing Hamlet of Heritage Pointe exceeds the land area of 260 hectares (640 acres)" (REF Application 2024-02 Growth Plan Alignment Statement, page 4) and is therefore not consistent with Growth Plan policy 3.1.8.5 e).

Under Growth Plan policy 3.1.8.2, "Foothills County does not require Board approval for the location of the three Hamlet Growth Areas provided the locations meet the criteria for new Hamlet Growth Areas established in the Growth Plan. Once the three Hamlet Growth Area locations are established by Foothills County they will be considered as Preferred Growth Areas in accordance with the Growth Plan. Hamlet Growth Areas in Foothills County must comply with all other policies of the Plan including 3.1.8.5." Because REF Application 2024-02 is not consistent with Growth Plan policy 3.1.8.5 a) and e), it is also not consistent with Growth Plan policy 3.1.8.2. After reviewing the policies of the Growth Plan related to establishing Hamlet Growth Areas, the hamlet of Heritage Pointe requires Board approval to become a Hamlet Growth Area given its size and location.

3.2 Complete Communities

As per Policy 3.1.2.1 "The Preferred Placetypes shall consist of the following three Placetypes: *Infill and Redevelopment, Masterplan Communities, and Mixed-use/TOD. The Preferred Placetypes shall be planned and developed as complete communities that provide:*

- a) *compact, contiguous development that makes efficient use of infrastructure and services;*
- b) *a diverse mix of housing types;*
- c) *Density in accordance with the associated Placetype definitions;*
- d) *Interconnected street network and urban form to support active transportation and transit;*
- e) *access to local services, neighbourhood amenities, and commercial uses;*

- f) access to local institutional and recreational services and/or enabling use of existing regional facilities in other municipalities where municipal agreements are in place; and*
- g) high quality parks, trails and open spaces that connect to regional trails where appropriate.”*

Creating complete communities is central to achieving the benefits identified in the Growth Plan. As noted in the Growth Plan in Section 3.1.2. Preferred Placetypes, “the Preferred Placetypes are development forms that, when used as the dominant development forms, improve environmental and fiscal outcomes and create opportunities for efficient infrastructure and servicing. Their use is key to the Growth Plan and should be used in all Preferred Growth Areas.”

Reviewing the proposed Heritage Crossing ASP in absentia of a planning concept for the entire Hamlet Growth Area and expansion area makes it difficult to establish if the proposed development supports the development of a complete community as per Growth Plan policy 3.1.2.1. As noted in the third party review, “Foothills County is proposing the undocumented division of the [Heritage Crossing ASP] Plan area into Masterplan and Residential Community Placetypes. The CMRGP does not contemplate Masterplan Community Placetypes as being 82 residential units devoid of commercial, civic and employment areas.” (Third Party Review, page 2). The REF Application 2024-02 Growth Plan Alignment Statement argues that access to local services, amenities and commercial uses is provided by the existing hamlet of Heritage Pointe: “the existing Hamlet of Heritage Pointe contains a central commercial shopping plaza, including the Heritage Pointe Fire Hall and community recreational facilities, as well as undeveloped Municipal Reserve and lands owned by Foothills County. The subject lands within the ASP are located directly south and within walking distance of the central commercial node.” CMRB Administration finds that REF Application 2024-02 does not include sufficient information about the integration of the Heritage Crossing ASP and the Hamlet Growth Area to determine if these areas would function as a complete community when viewed as a whole.

In addition, insufficient information is provided to appropriately determine if the requirements of future Hamlet Growth Areas policy 3.1.8.3 are met. Policy 3.1.8.3 b) states that “future growth in Hamlet Growth Areas shall...b) identify a main street or mixed-use node where employment and mixed-use development will be focused.” No main street or mixed-use node is identified in the Hamlet Growth Area future growth (i.e. the proposed Heritage Crossing ASP). Although the Growth Plan Alignment Statement notes that “the existing Hamlet of Heritage Pointe contains a central commercial shopping plaza” this is not clearly identified as a mainstreet or mixed-use node for the Hamlet Growth Area in REF Application 2024-02. No additional future growth has been identified in REF Application 2024-02 that would accommodate a mainstreet or a mixed use node beyond the proposed ASP. As such, REF Application 2024-02 is not consistent with Growth Plan policy 3.1.8.3.b).

3.3 Proportions of Preferred Placetypes

Growth Plan policy 3.1.4.1 c) requires that municipalities should achieve 60% Preferred Placetypes for new planned residential development in Hamlet Growth Areas. This means up to 40% of the new planned residential development in Hamlet Growth Areas can be in the Residential Community Placetype. As noted in the REF Application 2024-02 Growth Plan Alignment Statement, approximately 50% of the proposed new planned residential development in the Heritage Crossing ASP is Masterplan Community Placetype (see the REF Application 2024-02 Growth Plan Alignment Statement, pages 2 and 3).

REF Application 2024-02 commits to offsetting the deficit of Masterplan Community Placetype in a Preferred Growth Area in the future, stating that "Foothills County acknowledges the proportion of Preferred Placetypes required under policy 3.1.4.1 and is committed to offsetting the proposed Residential Community through future dedication of a minimum of 40 additional dwelling units within a Preferred Placetype either within the Hamlet of Heritage Pointe or another Hamlet Growth Area" (REF Application 2024-02 Growth Plan Alignment Statement, page 3). This is consistent with Growth Plan policy 3.1.4.2.b) which allows member municipalities to meet the requirements for the allotment of Preferred Placetypes in Preferred Growth Areas across the entire municipality. How the placetypes will be balanced across the municipality is to be presented in forthcoming Municipal Development Plan updates which must be approved by the Board. These are due by August 2025 as required by the policies of the Growth Plan. CMRB Administration finds that REF Application 2024-02 is consistent with Growth Plan policy 3.1.4.1 c) and 3.1.4.2.

3.4 Minimum Required Densities

The REF Application 2024-02 Growth Plan Alignment Statement identifies that proposed Heritage Crossing ASP includes a mix of the Masterplan Communities Placetype and the Residential Communities Placetype. The Heritage Crossing ASP does not identify the locations of placetypes within the ASP but does note that "Heritage Crossing is designed to meet the Residential Community Placetype criteria in accordance with the policies of the Growth Management Plan 3.1.4.4." (Heritage Crossing ASP Section 2.2.2 Calgary Metropolitan Region Growth Plan, page 9). Placetypes are only identified in general terms in the Growth Plan Alignment Statement ("The ASP proposes a maximum of 163 dwelling units with 81 units allocated within the Residential Community Placetype and a density of 3.5 dwelling units per acre, and 82 units within the Masterplan Community preferred placetype and a density of 6.0 dwelling units per acre" (REF Application 2024-02 Growth Plan Alignment Statement, page 2). The third party review report identifies a potential miscalculation of ASP densities, which are required to be a minimum average density of 15 dwelling units/hectare (6 dwelling unites/acre) for the Masterplan Community Placetype in Hamlet Growth Areas as per Growth Plan policy 3.1.2.2 c), and a minimum average density of 8.5 dwelling units/hectare (3.5 dwelling unites/acre) for the Residential Community Placetype in Hamlet Growth Areas as per Growth Plan policy 3.1.4.4.c) (see Third Party Report, summary page). CMRB Administration does not feel

it has sufficient information to determine if the proposed Masterplan Community Placetype and Residential Community Placetype densities are consistent with Growth Plan policy 3.1.2.2.c) and 3.1.4.4 c) because the location of the placetypes is not presented within the ASP and only an average density is provided.

4.0 Recommendation

That the Board **REFUSE** REF Application 2024-02, the Foothills County

- designation of the Hamlet of Heritage Pointe as a Hamlet Growth Area,
- approval of the proposed Heritage Crossing Area Structure Plan (ASP) as a Masterplan Community and Residential Community, and
- expansion to a Hamlet Growth Area necessary to accommodate the Heritage Crossing Area Structure Plan



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April 16, 2024

Jordon Copping, Chief Officer
Calgary Metropolitan Region Board
305, 602 – 11th Avenue SW
Calgary, AB,
T2R 1J8

Dear Mr. Copping:

Reference: **REF# 2024-02 for the Heritage Crossing Area Structure Plan in Foothills County**

Please find attached the third-party evaluation of the Heritage Crossing Area Structure Plan.

It is our opinion that the proposed statutory plan is not consistent with the goals, objectives and policies of the Calgary Metropolitan Region Growth Plan, being Schedule A to Ministerial Order MSD:064/22.

Olga Lovatt, RPP
Principal

LOVATT PLANNING CONSULTANTS Inc.

A handwritten signature in blue ink, appearing to read 'O. Lovatt', is written over a faint, larger version of the signature.

O. Lovatt,

REGIONAL EVALUATION FRAMEWORK (REF)

THIRD-PARTY REVIEW

Member Municipality	Foothills County
Application Name	Heritage Crossing Area Structure Plan
REF Number	2024-02
Type of Application	New Area Structure Plan
Municipality Bylaw #	34/2023
Date of Third-Party Review Report	April 16, 2024

Findings

That the Foothills County Heritage Crossing Area Structure Plan is **not** consistent with the goals, objectives and policies of the Growth Plan, Schedule A to Ministerial Order MSD:064/22.

Summary of Review

The L shaped 15.83 hectare Heritage Crossing Area Structure Plan area is located adjacent the south boundary of the Hamlet of Heritage Pointe. The ASP *provides the framework to guide development over time and achieve the vision for Heritage Crossing as an integrated and economically viable community.*

The Hamlet of Heritage Pointe is being proposed as one of three Foothills County’s Hamlet Growth Areas with the Heritage Crossing Area Structure Plan proposed as an Extension of a Hamlet Growth Area.

The land use concept designates 7.07 ha of the Plan area with three kinds of dwelling units: seniors’ bungalows (20 units), a semi-detached villa product (62 units), and the traditional single family home (81 units) for a total of 163 units.

5.93 hectares (37.5%) of the Plan area is dedicated as public open space (MR+ER+PUL). Open spaces are designed to provide buffers from adjacent uses and roadways. A comprehensive network of trails is included within open space areas to enhance mobility options. The Plan area does not include *retail, commercial, civic and recreational amenities* that characterize Masterplan Communities. Table 3 of the ASP predicts a population of 440 and a density of 11.17 dwelling units/hectare. Using the Regional Density Methodology that removes 0.36 hectares of dedicated Regional Open Space yields a regionally adjusted density of 11.5 dwelling units/hectare. This density is greater than the minimum 8.5 dwelling units/hectare required for a Residential Community Placetype, but less than the 15.0 dwelling units/hectare required for a Masterplan Community Placetype. Including the significant amount of open space within the Plan area skews the Regional Density Methodology calculation and misrepresents the number of units per hectare.

Sanitary Sewer and water service is to be provided to the Plan area from the Hamlet of Heritage Pointe by a private contractor.

The review found that the Heritage Crossing Area Structure Plan is **not** consistent with the goals, objectives and policies of the Growth Plan.

Review Prepared by

Olga Lovatt, RPP
Principal
Lovatt Planning Consultants Inc.

Part A: REF Review

The purpose of the REF review process is to confirm the alignment of statutory plans or statutory plan amendments with the goals, objectives, and policies of the Growth Plan. The following tables provide a summary of the third party review findings. Growth Plan policy areas that are “not applicable” to this REF application have been marked accordingly.

3.1 Blueprint for Growth

<p>3.1.1 Region-Wide Policies</p>	<ul style="list-style-type: none"> • The Plan area is within the City of Calgary/Foothills County Intermunicipal Development Plan. • The area is not within Calgary’s Future Growth Areas as designated in the City of Calgary/Foothills County Intermunicipal Development Plan. • Referral comments from the City Calgary state that: <i>Alignment to the Growth Plan should be explored further as this application progresses.</i> As well, the lack of continuity of a road segment was noted.
<p>3.1.2 Preferred Placetypes</p>	<ul style="list-style-type: none"> • Foothills County is proposing the undocumented division of the Plan area into Masterplan and Residential Community Placetypes • The CMRGP does not contemplate Masterplan Community Placetypes as being 82 residential units devoid of commercial, civic and employment areas. • The adjusted regional density of 11.5 dwelling units/hectare does not meet the 15.0 dwelling units/hectare required for a Masterplan Community Placetype.
<p>3.1.3 Preferred Growth Areas</p>	<ul style="list-style-type: none"> • New development is serviced with sewer and water and has access to community facilities and services in the adjacent Hamlet of Heritage Pointe. • No employment areas are within the Plan area.

<p>3.1.4 Placetype Targets for Population Growth</p>	<ul style="list-style-type: none"> • Hamlet Growth Areas are required to achieve a minimum proportion of a Preferred Placetype of 60%. However the challenge to the validity of the Masterplan Community Placetype means that the Plan area does not include an area of a Preferred Placetype. • <i>Heritage Crossing is designed to meet the Residential Community Placetype criteria in accordance with the policies of the Growth Management Plan 3.1.4.4.</i> The residential density of 11.5 dwelling units/hectare proposed by the ASP exceeds Residential Community Placetype minimum average residential density. • ASP policies limit the number of units per acre: <i>no greater than 4.55 dwelling units per acre (upa) across the Plan Area.</i> • The Masterplan Community Placetype minimum residential density is 15.0 dwelling units/hectare (6.0 upa)
<p>3.1.5 Rural and Country Cluster Placetype</p>	<ul style="list-style-type: none"> • N/A
<p>3.1.6 Rural Employment Area</p>	<ul style="list-style-type: none"> • N/A
<p>3.1.7 Location Criteria for Placetypes</p>	<ul style="list-style-type: none"> • The Residential Community Placetype must be located within a Preferred Growth Area. The Hamlet of Heritage Pointe is not a Preferred Growth Area (3.1.8 below).
<p>3.1.8 Hamlet Growth Areas</p>	<ul style="list-style-type: none"> • The Plan area does not <i>identify a main street or mixed-use node where employment and mixed-use development will be focused</i> as required for new growth in Hamlet Growth Areas. • The north boundary of the Hamlet of Heritage Pointe was established in 1992. It is now contiguous with the south boundary of City of Calgary and therefore does not meet the first of eight merits for the Boards consideration for creating new Hamlet Growth Areas. • The Hamlet of Heritage Pointe has the <i>potential for urban-style development of the Infill and Redevelopment Preferred Placetype</i>
<p>3.1.9 Joint Planning Areas</p>	<ul style="list-style-type: none"> • The proposed ASP is not within a Joint Planning Area.

<p>3.1.10 Existing Area Structure Plans and Area Redevelopment Plans</p>	<ul style="list-style-type: none"> Heritage Crossing Area Structure Plan is a new Area Structure Plan.
<p>3.1.11 Municipal Development Plan Updates</p>	<ul style="list-style-type: none"> A concurrent Municipal Development Plan amendment is required to designate of a portion of the Plan area as a Masterplan Community and name the Hamlet of Heritage Pointe as a Hamlet Growth Area.
<p>3.1.12 Exceptions to the Policy</p>	<ul style="list-style-type: none"> Although many Growth Plan policies are compromised by the approval of the ASP, the proposal has merit in that urban residential densities infill a low residential density exceedingly fragmented area. <i>Focusing new residential growth into development forms which will better support the CMRB Regional Vision and Growth Plan objectives is illustrated by the proposed ASP.</i>

3.2 Economic Wellbeing

<p>3.2.1 Municipal Development Plans</p>	<p>See 3.1.11above. The proposed ASP includes a network of trails within and links to external pedestrian walkways to support active transportation.</p>
<p>3.2.2 Regional Transportation Planning Support for Economic Wellbeing</p>	<p>Not applicable to individual statutory plans for the purposes of REF.</p>
<p>3.2.3 Agricultural Economy</p>	<p>Not applicable to individual statutory plans for the purposes of REF.</p>

3.3 Protect and Enjoy the Environment	
3.3.1 Flood Prone Areas	N/A
3.3.2 Environmentally Sensitive Areas	One of the Objectives of the ASP is <i>to foster long term preservation of environmentally and historically sensitive areas</i> . However, the ASP concludes that no environmentally sensitive areas existing within the Plan area.
3.3.3 Climate Change	Not applicable to individual statutory plans for the purposes of REF.

3.4 Water Stewardship	
3.4.1 Watershed Protection	Not applicable to individual statutory plans for the purposes of REF.
3.4.2 Stormwater Management	Not applicable to individual statutory plans for the purposes of REF.
3.4.3 Water Efficiency	Not applicable to individual statutory plans for the purposes of REF.
3.4.4 Collaboration and Governance	Not applicable to individual statutory plans for the purposes of REF.

3.5 Shared Services Optimization	
3.5.1 Transportation & Transit Corridors	Alberta Transportation and Economic Corridors Department - <i>Request the TIA for the Heritage Cross ASP to include analysis of the Highway 2A at Dunbow Road and the Highway 2 @ Dunbow Road intersections to ensure the highway can accommodate the proposed development.</i> The proposed ASP does not include provisions for transit.
3.5.2 Energy and Utility Corridors	No indication within the proposed ASP of a pipeline that appears to parallel Dunbow Road as shown on Schedule 4 CMRGP.
3.5.3 Planning and Protection for Regional Corridors	Not applicable to individual statutory plans for the purposes of REF.
3.5.4 Recreation	Not applicable to individual statutory plans for the purposes of REF.

Part B: Consistency with applicable Context Study

As per Growth Plan policy 4.1.1.3, “prior to the incorporation of outcomes of Context Studies within amendments to the Growth Plan, the Board must consider approved context studies in its decision-making.”

1. Is any portion of the plan area of the statutory plan or plan amendment within a Joint Planning Area?
 Yes No
2. If yes, has a Context Study been approved by the Board for this Joint Planning Area?
 Yes No
3. If yes, please complete the appropriate Context Study review template and attach to this third party review.