

To: Xin Deng, Planning Services, Rocky View County
From: Rocky View Forward
Date: April 26, 2019

Subject: Proposed Amendments to the County Plan

Rocky View Forward is a resident advocacy group that represents 300 – 400 families across the County. Rocky View Forward does not support any of the proposed amendments to the County Plan scheduled to be considered at the public hearing on May 28, 2019. Decisions on their appropriateness should be deferred until the comprehensive review of Rocky View's entire municipal development plan. The reasons for our position are outlined below.

Amendments #1 & #2 – Revising Policy 5.5 and Deleting Policy 9.5

As described in the County's material, these amendments will remove the population targets for hamlets and have hamlet populations determined by the relevant Area Structure Plans.

Rocky View Forward believes that these amendments are pointless and introduce potential bias into the overall review of the County Plan that is scheduled to begin very soon.

None of Rocky View's hamlets are close to the population ceilings specified in the County Plan. Since the County Plan's provisions are not a binding constraint anywhere in the County, the amendments are unnecessary.

Langdon is the only hamlet in Rocky View that is even close to the County Plan's target of 5,000 – 10,000. At about 5,500 residents, Langdon is still well within the County Plan's range. In any case, Langdon's population is set by its ASP at 13,000, a ceiling already higher than the County Plan guidelines. Langdon's population ceiling was set in exactly the way this amendment proposes – as part of its ASP. So, why is the amendment needed?

Given this reality, Rocky View Forward can see no rationale for rushing these amendments through. They should be left to the full review of the County Plan. To do otherwise biases that review.

The hamlet population targets support the County Plan's objectives to encourage moderate growth and to balance urban and rural demands in the County. To remove one of the policies that support the current Plan's objectives at this point signals that Council may have prejudged the relevance of these objectives. The continuing appropriateness of these objectives will be a critical part of the County Plan review. A review of population projections and anticipated growth rates is a key component of any review of the municipal development plan.

If Council wants unbiased, objective input from residents and other stakeholders on what Rocky View's future municipal development plan should look like, these amendments should be deferred until they can be reviewed in their proper context.

Amendments #3 & #4 – Revising wording for location of business development

These amendments are described as providing flexibility to locate business development adjacent to, but outside of, existing business areas in approved Area Structure Plans.

Rocky View Forward believes that these amendments should not be supported because they erode the core purpose of the County Plan. The fundamental rationale for a municipal development plan is to identify how development should proceed in the municipality. If that plan then allows business development outside of identified areas, what is the purpose of a municipal development plan?

To enshrine the ability to override the County Plan's land use policy disregards key requirements of the Municipal Government Act. Section 632(3) clearly states that a municipal development plan "must address the future land use within the municipality."

These amendments would permit business development in any location for which Council felt an applicant made a justifiable argument. This fails to meet the test of having the municipal development plan address and identify future land uses for assessing land use applications.

These amendments also send an extremely negative message to landowners who "played by the rules" and own land within approved ASP business areas. The County has identified their property as land that will be developed before land outside of the ASP areas.

These amendments, if passed, will disadvantage these landowners. The message will be that the County doesn't value its commitments and that there is no benefit to following the rules. Rocky View Forward believes that this would be a very damaging message to overall business confidence in the County. What business will want to invest in Rocky View if its competitors, who ignore the County's rules, can gain advantages over them by locating on cheaper land outside of the approved business areas?

If the existing business areas are no longer suitable, the comprehensive review of the County Plan is the appropriate time to re-examine this issue. As with the hamlet amendments, there is no pressing need to fast-track these amendments when a thorough review is scheduled so soon.