

July 5, 2008

Honourable Ted Morton  
Minister of Sustainable Resource Development  
Legislature Office, 420 Legislature Building  
10800 – 97<sup>th</sup> Avenue  
Edmonton, AB T5K 2B6

Dear Minister Morton:

**Re: Government of Alberta's Draft Land-use Framework – Alberta Association Canadian Institute of Planners (AACIP) Perspective**

Further to your recent request for Albertans to comment on the Draft Land-use Framework, I wish to provide you with formal representation of the Alberta Association Canadian Institute of Planners (AACIP), Alberta's professional association representing over 750 planners working across the Province.

We offer first our congratulations for having completed this endeavour to reengage the Government of Alberta in land-use deliberations. It is appropriate and necessary for Alberta to set direction, limits and guidance on how the province will develop from a land-use perspective. The Land-use Framework will play a critical role in planning the future of Alberta. It will set the tone and direction for development through its implementation at both municipal and provincial levels.

While our members have taken great individual efforts to participate in the creation of the Land Use Framework, my intention is to formally communicate our Association's response to the Public Feedback Survey. Our intention is to:

1. Identify useful and practical elements of the Land-use Framework
2. Identify areas to strengthen the draft Land-use Framework to meet the desired outcomes established in the Framework.

Should you wish to explore the contents of this submission further, please do not hesitate to contact me at 780-437-2913.

We very much support planning efforts that seek the social, environmental and economic success of Alberta's communities. Thank you for your efforts to provide this to Albertans, present and future.

Sincerely,



Brian J Kropf, ACP MCIP  
President

Attachment

CC. Dave Bartesko, Alberta Sustainable Resource Development  
Gary Buchanan, AACIP President Elect

# AACIP Response to Public Feedback Survey

## ***Question 1. Overall strategies in the Framework do not outline a plan to address the land-use issues and challenges facing Alberta***

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AACIP does not support this statement. While the draft Framework describes a method to address land-use issues and challenges facing Albertans, the draft Framework does not define specifically desired outcomes that can be measured. Without a defined end in mind, a plan is not in place, nor is it possible to implement.

Notwithstanding the above, it is crucial to recognize the policy shift that brings the Government of Alberta back into the land-use discussion in Alberta. It is appropriate for the Government of Alberta to set expectations on land-use and set provincial policy expectations to ensure our growing economy is sustained in balance with Albertans' social and environmental goals (p. 3 LUF).

Alberta risks being overwhelmed by the scope and pace of growth activity (p. 7 LUF). It is noted that the growth indicators do not contemplate the implications of continued oil sand production, reaching upwards of 5 million barrels of oil per day. The Framework does not contemplate where growth will occur in Alberta and the various land-use demands that will result from the growth. Many growth demands, the provincial picture they paint, should be established in the Framework to ensure they are implemented in each regional plan. The Framework is a distinct opportunity to ensure that Government of Alberta policy is integrated with itself at a provincial scale, before integrated with itself at the narrower regional scale.

The draft Framework describes “Where We Want to Be” through a vision statement and desired outcomes (p. 9 LUF). The intentions described here are appropriate. The success of the Framework will reside in the Government of Alberta’s ability to determine whether or not these outcomes have been met. Targets must be established to measure success. While it is implied that such targets will be established by the regions, it is imperative that a true collective expectation be determined against which the regional plans should be held accountable. The regional plans as a group must be integrated to meet measurable targets.

Explicitly state from an Alberta perspective where growth will and will not occur. This should be an “Alberta” discussion. To effectively manage growth across Alberta, there is an opportunity to state:

- where growth will / will not occur
- how much growth is expected
- the kinds of growth is expected where

- what preparations are each region expected to make to accommodate growth
- what resources are needed to accommodate growth
- what are the priorities for assigning resources to accommodate growth

***Question 2. Strategy 1 – The regional planning approach will integrate provincial policies at the regional level, provide the context for land-use decision-making within the region, and reflect the priorities of each region***

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The creation of regional plans is positive, as is clearly articulated integration of provincial policies at a regional level. The Framework will be most successful if provincial policies are integrated at a provincial level first to establish clear expectations for the respective regions. A balance between Provincial and regional priorities needs to be sought – heading in to the process the Government of Alberta should establish benchmark targets. When regional plans emerge, we will see if they collectively meet the target. Without provincial targets, AACIP is not in agreement with the statement.

The use of watersheds to guide regional planning is strongly supported.

***Question 3. Strategy 2 – The Framework strikes the right balance between provincial leadership and local decision-making***

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AACIP supports this statement with the following caveat: land-use planning governed by the Municipal Government Act, and Section 692, afford rights to the public and land owners that ought to be maintained for consistency in the regional planning process.

The draft Framework proposes final approval of regional plans rests with Cabinet but is silent on how the public will be involved in the creation and adoption of regional plans. The Framework will be both more credible and successful if it sets clear, consistent standard processes to allow all Albertans opportunities to provide input into the regional plans. This expectation should be embedded in the Framework. The Land-use Secretariat should at a minimum, and consistent with the MGA, advertise, hold and attend a series of public hearings in various locations in each region once a draft regional plan is prepared. The intention of this effort is to ensure that affected parties are given the opportunity to speak or provide submissions on a draft regional plan prior to a decision being made by Cabinet.

It is recommended that once measurable outcomes are defined for Alberta as a whole that those also be shared with the public in the same manner; Alberta outcomes constitute the “Alberta Plan”.

Clearly delineating the roles of provincial, regional and local levels of government will be necessary to facilitate success. The size of the regions, which is necessary to ensure a regional perspective, results in a challenge to ensure appropriate representation on regional advisory councils. Their membership will need to include various competing interests to ensure credibility and success.

***Question 4. Strategy 3 – The cumulative effects approach considers the total impact of development, over time, in decision-making. It determines the capacity of the land and the environment to support the effects of all activities and identifies thresholds for the air, land, water and biodiversity. A cumulative effects approach will help manage the combined impacts of development on air, land, water and biodiversity***

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The cumulative effects management approach is essential to understanding if the stated outcomes for Alberta are met. The significant weakness of the draft Framework is that Alberta-wide outcomes are described without indicators of success – no targets are established (p. 13-14). We will not know if Alberta, or the regions collectively, have collectively met its outcomes or not.

This weakness will result in:

- Inconsistent regional definitions of cumulative effects
- Inconsistent regional targets and thresholds
- Inconsistent regional expectations and measures of sustainability
- Erosion of the benefits of cumulative effects management

The opportunity for the Framework is for Alberta to set targets against which regional work will be assessed. This may well include different expectations for the regions, hence the need for the bigger provincial picture, but ultimately this is necessary to effectively manage cumulative effects.

This effort is **THE** key to achieving provincial sustainability if targets are established. All other components of the Frameworks should align to the targets to ensure success.

**Question 5 and 6. Strategy 4 – The Framework identifies effective approaches that will encourage conservation and stewardship on public and private lands**

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Without established targets it is difficult to evaluate whether this statement is appropriate.

Notwithstanding the above, the principle of reducing fragmentation of agricultural land, and its conservation, is positive. It is not clear what the result will be without a target. It should be noted that guidance around growing urban centres and the growth exurban development is appropriate. The above comment applies to natural areas as well.

It is noted that the tools mentioned for private and public land stewardship useful tools. Their success in meeting provincial outcomes (p. 13, 14 LUF) resides in establishing the desired end (target) to guide decision making. Establishing provincial targets is crucial to successfully meeting provincial outcomes.

**Question 7. Strategy 5 – An integrated information system is needed to support land-use planning, decision-making and research**

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A province wide information and knowledge system will be very useful to both planners and decision makers at municipal, regional and provincial levels. This notion is supported. It is noted that the Framework will not be successful without the establishment of measurable targets for Alberta.

**Question 8. Strategy 6 – The intent of the draft Framework is to strike a meaningful balance that respects the constitutionally protected rights of Aboriginal communities and the interest of all Albertans**

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AACIP welcomes the recognition in the draft Framework of the needs of Aboriginal peoples. This recognition needs to be accompanied by measurable outcomes to ascertain at a future date whether the outcomes have been met. It is also noted that there is an opportunity to provide guidance to urban Alberta with respect to Aboriginal communities.

**Question 9. Overall, do you feel the draft Framework addresses the land-use issues facing Alberta today? What, if any, land-use issues were not addressed in the draft Framework?**

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Without targets associated with provincial vision and desired outcomes, it is not possible for the Government of Alberta to manage the growth pressures that Alberta is experiencing. There are provincial choices to make. They do not reside distinctly within regions. Overall expectations of what will happen where, and in what manner, are not established.

The growth is demanding that Albertans consider what it desires for its future urban centres. The growth also demands that Albertans consider how our land-use erodes the health of agricultural and natural systems, as well as economic and social systems. It is appropriate for the Government of Alberta to delineate areas where development will occur (and not occur) from a provincial perspective.

It would be appropriate to make the connection between economic health of Alberta with diversification of economic activity.

**Question 10. Overall, how easy or difficult did you find the draft Framework to understand?**

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The presentation of the material is fairly easy to understand. The true meaning of the draft Framework, and the intentions of the Government of Alberta, would be best communicated with targets.

Some additional definitions in the glossary would be useful for the reader, and assist with consistent interpretation:

- “effects”
- “heavy industrial”
- “metropolitan plan”
- “nuisances”
- “upgraders”
- “world scale”

The implementation of the Framework needs some clarification, specifically with respect to the effect on municipal planning. A graphic representation (Gantt chart perhaps) would be useful to clarify expectations so municipalities can plan accordingly.