



LETHBRIDGE
CHAMBER of COMMERCE®

Response to South Saskatchewan Regional Plan Resolutions

Issue

The Lethbridge Chamber of Commerce has been invited to submit recommendations in response to the 100k Kitchen Table Conversation survey administered by the City of Lethbridge in regards to City positions on concepts such as Neighbourhood Design Systems, Urban Footprint, and Compact City. These topics follow from the South Saskatchewan Region Plan's recommendations for Efficient Land Use in Urban Areas.

Background

The South Saskatchewan Regional Plan

The Government of Alberta's South Saskatchewan Regional Plan (SSRP) was approved on July 23, 2014, and became effective on September 1, 2014.

The SSRP establishes a long-term vision for the South Saskatchewan Region and aligns provincial policies at the regional level to balance Alberta's economic, environmental and social goals. The regional plan also includes strategies for responsible energy development, sustainable farming and ranching, forest management, and nature-based tourism.

The government's intention is that this regional plan makes a clear statement about the region's long-term commitment to conservation, protection of watersheds, sustaining biodiversity and sensitive habitats, and to the continued growth and prosperity of southern Alberta.

However, it is clear that the document includes a great deal of latitude in interpretation and common sense and universal precedence informs us that interpretations of the document will inform local policy development at the Municipal and Regional level. Lethbridge is required to be compliant by 2019.

As such, it is important for the Lethbridge Chamber of Commerce to go on record in response to some of the inquiries posed by the City of Lethbridge in their 100k survey as pertains to the concepts flowing out of the SSRP's position on Efficient Land Use, and ultimately the updated Municipal Development Plan in 2019.

The Lethbridge Chamber of Commerce Recommends

Our developed response below will touch on 3 points contained within the SSRP which have found expression in the 100k survey disseminated by the City of Lethbridge, which bear directly on the business community in Lethbridge, Alberta. The responses below do not constitute the entirety of the Chamber's position on these issues, and we reserve the right to develop our responses in reaction to developing policies as they emerge and begin to interact with our sphere of influence. The broad-reaching and intersectional nature of many of the recommendations included in the SSRP necessitates that the Chamber's position on emerging issues remains fluid.

This document will deal with the SSRP's recommendations for 1.) Neighbourhood Design Systems, 2.) Urban Footprints and 3.) Compact Cities.

Section 1: Neighbourhood Design Systems

Overview: The neighbourhood design system proposed for Lethbridge follows the 'live, work, shop, and play' model – a system that seeks to create opportunities in each distinct neighbourhood for each category. Notably, this means that each designated neighbourhood must have a commercial district embedded within it to provide for the surrounding area. There are 38 identified neighbourhoods in the city.

Observations and Implications:

- With a population of 100,000, 38 distinct neighbourhoods will yield an average neighbourhood population size of 2,632 people.
- The live, work, play model is a great model for communities where transportation between neighbourhoods is not convenient. This is not the case in Lethbridge. The small size of our city, and the ease of transportation, means that everything is convenient, and locals are not driven by necessity to the businesses in their neighbourhoods.
- The small population size of individual neighbourhoods also means that thriving commercial areas in each designated neighbourhood are simply not possible, with the distinct exception of certain staple businesses (i.e. Liquor stores, gas stations).
- Enforcing a model where commercial spaces are created in every neighbourhood, despite lack of demand, creates a cycle of failing businesses. There are prime examples in numerous locations around town. Because of the ease of transportation around town, small community businesses compete directly with all businesses around town.

Recommendations:

- 1.) The City of Lethbridge should pursue a balanced approach to the live, work, shop, play model, understanding that every community cannot have a commercial district with thriving businesses, and that attempting to impose this model on communities will only create a cycle of failed businesses.
- 2.) In the ideal model, every community might not have a commercial district. Commercial districts instead will be placed on main corridors where they are easily accessible from multiple communities. This allows the businesses to pull customers from a larger catchment area while still providing a central hub for local neighbourhoods where people can shop and work.
- 3.) 'Work' should include new models of business, including high-tech, work-from-home, and broad band businesses. With the proper infrastructure and zoning in place, new technologies can satisfy the live, work, shop, play model without the negative effects of imposing commercial zones on every residential area.
- 4.) Place multi-family near commercial/work areas, providing easier access to work/school.
- 5.) Provide for and/or regulate a downtown business mix that balances daytime and evening customer profiles, so areas are not all open in the day and vacant in the evening.

Section 2: Urban Footprint

Overview: A key objective of the SSRP is to limit urban sprawl with the underlying assumption that this is an intrinsically good objective. It is our opinion that the guidelines of the SSRP regarding reducing Urban Footprints were built out of the experiences of large cities like Calgary and Edmonton and that the same restrictions would not be beneficial to the Lethbridge business community at this point in history.

Observations and Implications:

- The notion that urban land is wasted land is a false assumption. Urban use of land is not a waste of land, rather it's a higher, more intensive, use of land from an economic standpoint.
- The laws of supply and demand dictate that if you limit urban expansion, the real costs of living within the city will rise. Therefore, the benefit gained from limiting that expansion needs

to outweigh the negative effects of rising land, house, business, and living costs. Limiting urban expansion in Lethbridge would make life more expensive for a population that is already suffering from a high incidence of poverty.

- In very large cities suffering from endemic urban sprawl, traffic congestion, and the need to build and maintain affordable public transit, there are distinct benefits to limiting this expansion. However, the same conditions do not exist here in Lethbridge.
- Lethbridge wants and needs to grow as many of the chief economic advantages offered by our city involve physical expansion and the attraction to our city of new businesses and industry. Capital costs are relatively cheap in southern Alberta, making it an attractive destination for new and existing businesses to set up shop.
- Businesses no longer need to be in large urban centres in order to profitably conduct commerce. Lethbridge offers cheap land, cheap building costs, and cheap overhead while providing comparable services, infrastructure, and a quality of life that is comparable – or superior – to large cities.
- Restricting urban growth would severely limit our competitive advantage at a time when Lethbridge does not suffer any of the ill effects of urban sprawl.

Recommendations:

The Lethbridge Chamber of Commerce recommends that the City of Lethbridge take the view that urban growth is not intrinsically negative, but rather that urban growth becomes a problem only after a certain point when complicating factors begin to mount. The City should take a long view, planning to address and curtail urban sprawl at such a point where negative factors begin to increase, while taking advantage of urban growth to leverage our competitive advantage in the short-term.

Section 3: Compact City

Overview: Another key objective of the SSRP is to increase the density of cities as part of the strategy of limiting urban sprawl. While the Chamber of Commerce has already established that limiting the urban footprint in Lethbridge is not at present a desirable goal, there are areas of the city where increased densification would contribute to the health of businesses in those areas.

Recommendations:

The Lethbridge Chamber of Commerce recommends increasing density in the following areas:

- North of Highway 3 to 5th Avenue North, and from Scenic Drive to the 13th Street Corridor.
- The areas immediately around the University of Lethbridge.
- The areas immediately around Lethbridge College and Enmax Centre.
- The areas around the commercial business zone at the south end of Mayor Magrath Drive.

General Point

The City of Lethbridge should focus on increasing densification in areas where there is a *natural demand*. The nature of a city like Lethbridge, with an efficient transportation network, small land area, and convenient, affordable, land on the periphery, dictates that there are not many natural opportunities for densification. Forcing densification on an area where there is NOT a natural demand only multiplies inefficiencies and leads to further complications. Anywhere where there is a large business area or a post-secondary school is an ideal place for densification.

Lethbridge should not be blinded by the false assumption that limiting urban growth and increasing density is intrinsically good. By doing so, Lethbridge will miss out on opportunities to bring in new business and will not be able to effectively leverage our competitive advantage of cheap land and cheap overhead.