

Three Sisters: one Banff, or two or three?



Lost in the dense and often confusing details regarding the Three Sisters development project in Canmore is the sheer magnitude and scale of the current proposal compared to earlier proposals. Their earlier proposals, spanning 1998 to 2013, called for adding the equivalent of one Banff (ie., 2,729 residential units). The current Three Sisters proposals, when “bonusing” is included, would be well over two Banffs, and when combined with their existing Stewart Creek residential units, three Banffs. That’s a massive amount of development for an ecologically sensitive area with extensive undermining.

In 2013, there were about 2500 unbuilt residential units remaining, and 1500 visitor units (eg., hotel rooms). Here’s a [2013 RMO article](#) in this regard. These numbers were derived from the allowed maximum units in Section 14.9.2.4 of Bylaw DC 1-98, which governs development on Three Sisters lands. As a footnote, the 2009 Three Sisters Master ASP plan by [East West Partners](#) was significantly smaller (about one Banff total, including Stewart Creek).

What happened in 2013? With impressive financial acumen and alchemy, Three Sisters acquired their own now-[bankrupt project](#) back for [\\$12.5 million](#), pennies on the dollar, after which their residential building ambitions dramatically increased, and their promised commercial projects vanished (ie., their five-star hotel and a conference center).

Fast forward to now: Three Sisters’ proposed residential units have increased from about 2500 in 2013 to between 4000 and 7150 in 2021. So, a 57% to 180% increase in residential units from 2013. Both totals are well over the maximum limit of 3447 residential units specified in Bylaw DC 1-98 (sorry about all the numbers but they are

important). The 7150 total is inclusive of an unspecified number of “bonused” market-based “affordable ownership” units, and “bonused” units for energy efficiency and climate change-related improvements.

Regarding affordable housing, keep in mind that in 2013 the owners proposed [5% perpetually affordable housing](#) (ie., true affordable housing not just market-based relatively “affordable ownership”). And regarding energy efficiency, much of the “bonusing” (ie., 20 to 90% better than Alberta’s existing building code) does not even achieve BC’s current building code ([Table 44 - Building codes](#)).

The equivalent of one Banff at Three Sisters is hard enough to imagine but two or three is unfathomable, and for whose benefit? The impacts on our environment (wildlife corridors, parks and carbon footprint), our infrastructure (eg., increased road and bridge congestion), our tax rates (due to an anemic commercial tax base), our community values, and lastly, our quality of life would be profound and permanent.

	Stewart Cr.	Residential units	Total
1998 (DC 1-98)	925	2522	3,447
2009 (EWP)	925	1770	2,695
2013 (PWC)	925	2549	3,474
2021 (min.)	925	4000	4,925
2021 (max; bonusing)	925	7150	8,075

1 Banff = [2,729 residential units](#)

2 x Banff = 5458 residential units

3 x Banff = 8187 residential units

TSMV plan	Residential units	Visitor units (eg., hotel rooms)
1998 DC 1-98 (legal framework)	2522	1500
2004 TSMV - Resort Centre ASP	0	1,330 to 2,525
2004 TSMV - Stewart Creek	925	20
2009 TSMV Master ASP (EWP)	1700	?
2013 TSMV ASP (PWC)	2549	1500
2020 TSMV - TSV ASP (3000 to 5000*)	4000 to 7150*	450 to 700*
2020 TSMV - Smith Creek ASP (1000 to 2150*)		
	----- 4,000 to 7150	
* with bonusing		
EWP = East West Partners		
PWC = PricewaterhouseCoopers		

Appendix

Appendix

[Three Sisters Village ASP](#)

[Smith Creek ASP](#)

[Bylaw DC 1-98](#)

[2013 ASP AREA STRUCTURE PLAN](#)

Three Sisters Village ASP

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Table 1 Three Sisters Village Unit and Density Projections

(with bonusing)

Plan Area: 169 Ha Plan Area Density: 15 - 30 UPH Population: 5,500 to 10,000 Residential Unit Range: 3,000 - 5,000			
	Minimum	Maximum	% of Plan Area
Residential District	40 ha	45 ha	25-30 %
Estimated Range			
Townhouse Units	1,300	2,700	
Apartments Units	800	1,000	
Tourist Homes Units	400	500	
Village Centre	2500 5 ha	4200 10 ha	3-6%
Estimated Range			
Tourist Homes Units	500	800	
Visitor Accommodation / Hotel Rooms	250	450	
Recreation District	0 ha	0 ha	0-0%

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5.2 Land Use Concept



1. The Land Use Concept (Map 9) shall be considered by the Approving Authority as conceptual when reviewing future planning applications within Three Sisters Village. Boundaries of the land use concept and open space designations shown on the map are meant to be illustrative only and may vary to accommodate planning, design or engineering considerations at more detailed stages within the planning process.
2. The minimum number of residential units permitted within the Plan Area is 3,000. An additional 2,000 units are permitted to a maximum of 5,000 units, when bonusing is applied. Residential units for the purpose of this policy includes tourist homes.

The above 3,000 "minimum" conflicts with Bylaw DC 1-98, which allows only a further 2522 residential units on Three Sisters land (ie., TSV and Smith Creek combined).

Smith Creek ASP

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2. The number of residential units permitted within the Plan Area is 2,150. At the time of Land Use Redesignation, the maximum number of units that can be achieved without **bonusing** shall be established.

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Table 1 Smith Creek Unit and Density Projections

Plan Area: 154 Ha | Plan Area Density: 5 - 15 UPH | Population: 2,175 to 4,500 | **Residential Unit Range: 1,000 - 2,150**

	Minimum	Maximum	% of Plan Area
Residential District	65 ha	70 ha	40-45%
Estimated Range			
<i>Low Density Units</i>	600	1250	60-75%
<i>Accessory Dwelling Units</i>	200	400	
<i>Medium Density Units</i>	200	500	25-40%
Commercial District	3 ha	5 ha	2-3%
Industrial District	12 ha	15 ha	8-10%

Bylaw DC 1-98

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Note: the 3,447 maximum limit applies to all Three Sisters land (ie., all ASPs combined)

Section 14.9.2.4 - Total residential units

14 DIRECT CONTROL DISTRICTS

14.9.2.4 Total Residential Units

The total number of Residential Units within this District shall not exceed 2,847 units except where Residential Units are provided in lieu of Timeshare Units allowed under Subsection 14.9.2.5.

In any case, the total number of Residential Units and Timeshare Units shall not exceed **3,447** units.

14.9.2.5 Total Timeshare Units

The total number of Timeshare Units within this District shall not exceed 600 units.

Where Timeshare Units are not proposed, an equivalent number of Residential Units, in

The above snip is from Canmore's current land use bylaw.

The land use bylaw is a governing document used to direct building and development projects within the community.

“A [bylaw](#) is defined as a law made by a local authority in accordance with the powers conferred by or delegated to it under statute. A municipal bylaw is no different than any other law of the land, and can be enforced with penalties, challenged in court and must comply with higher levels of law.”



BYLAW 2018-22

A BYLAW OF THE TOWN OF CANMORE, IN THE PROVINCE OF ALBERTA, TO PROHIBIT OR REGULATE AND CONTROL THE USE AND DEVELOPMENT OF LANDS AND BUILDINGS

Revised April 1, 2020

The Council of the Town of Canmore, in the Province of Alberta, duly assembled, enacts as follows:

1: TITLE

1.1. This bylaw shall be known as the “Revised Land Use Bylaw.”

2: PROVISIONS

Section 14.9.2.4 regarding total residential units for Three Sisters is found in “Direct Control Districts” which specifically governs development in Three Sisters.

14 DIRECT CONTROL DISTRICTS

14.9 THREE SISTERS RESORTS DC DISTRICT [1-98DC; 16(Z)2001DC; 18(Z)2002 DC; 15(Z)2002 DC; 34(Z)2003 DC; 36(Z)2004 DC; 07(Z)2006]

14.9.1 Definitions

14.9.1.1 Business Park

A Business Park contains clean, employment generating land uses that are not predominantly oriented to the retail sale of goods and personal services. Uses such as offices, arts studios, cultural establishments, business services, research and development facilities, health clinics, light manufacturing and light fabrication industries will be appropriate uses in Business Parks. Retail stores over 200m² (2,153 sq. ft.) and uses such as factory retail outlets and warehouses with large retail sales outlets shall not be allowed in Business Parks.

14.9.1.2 Entry-Level Housing Units

Entry-level housing units are residential lots or multi-family housing units intended for full-time residential use which meet the following requirements:

2013 ASP AREA STRUCTURE PLAN

[Link](#)

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The 2013 Three Sisters ASP was consistent with Bylaw DC 1-98 (ie., about 2,500 units remaining)

1.1 ASP PREPARATION AND PROJECT BACKGROUND

In 2004, the Town of Canmore approved the Resort Centre and Stewart Creek ASPs. The Resort Centre ASP provides for between 1,330 to 2,525 resort accommodation units and a maximum of 175,108 sq. ft. of commercial space. The Stewart Creek ASP provides for a maximum of 925 residential units and 350,000 sq. ft. of commercial space. Sites 7, 8, and 9 do not have an approved ASP at this time but there are approvals provided in Bylaw 1-98 (DC) (as amended) for 150 visitor accommodation units and 250,000 sq. ft. of commercial/retail. In total, there are a maximum of 4,049 units comprised of 2,549 residential units and 1,500 visitor accommodation units remaining to be constructed on the undeveloped TSMV lands.

In addition, as part of the ASP approvals in 2004, the majority of the lands identified as the "Along Valley" and "Across Valley" wildlife corridors, some 176 hectares (434 acres) have been accented

10.2 PROVIDE 5% OF TOTAL RESIDENTIAL UNITS AS PERPETUALLY AFFORDABLE HOUSING

10.2.1 OBJECTIVES

- a) Perpetually Affordable Housing (PAH) units within the Plan Area will provide housing for those full time residents unable to afford market housing in Canmore.
- b) Perpetually Affordable Housing may be integrated within market developments, located on a distinct parcel(s) within the Plan Area, or may be located in an alternative location outside the Plan Area.