

Changes to the Growth Plan Update from City of Edmonton Feedback

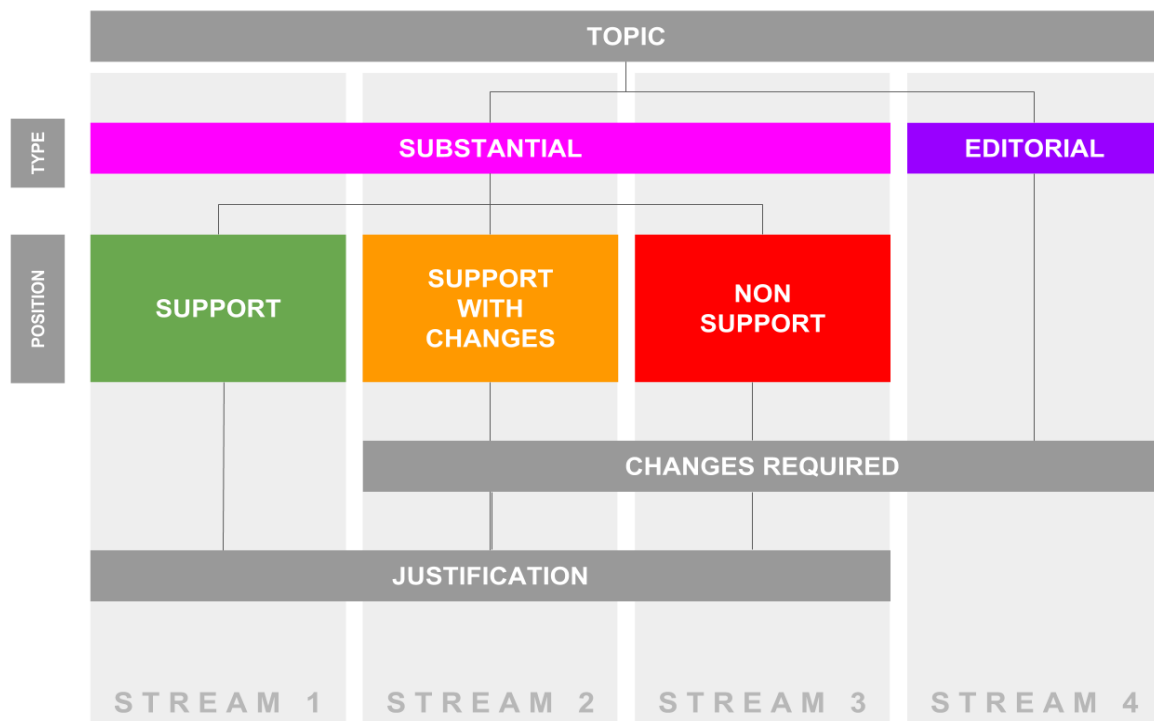
SUMMARY

On June 29, 2016, following direction from Council, the City of Edmonton's feedback on Draft 2.0 of the Growth Plan Update was shared with Capital Region Board administration.

The following is a summary of the changes requested and the subsequent action taken. The topics and justification remain as they were found in the original submission with notes on how they were address below.

Where changes were made that align with City of Edmonton feedback, they are represented in **BLUE**. Where changes weren't made in alignment with City of Edmonton feedback, they are in **RED**.

Where there have been changes in referencing information (i.e. policy number, page number), those have been updated to reflect what is in the Final Draft.



STREAM 1

TOPIC: INTENSIFICATION, TOD, CENTRE DENSITY TARGETS

REFERENCE: Policy Area 4, Schedule 6

PAGES: 59

TYPE: SUBSTANTIAL

POSITION: SUPPORT

JUSTIFICATION: This is a new addition in the Growth Plan Update and is not currently considered within the current Growth Plan, which focused only on greenfield density targets. These density targets for intensification, transit-oriented development and centres are meant to be aspirational. This means that municipalities will progress towards meeting these targets over the timeframe of the plan and they will not be used as a measurement of compliance for new statutory plans.

The proposed intensification target for the City of Edmonton is 25% of new dwellings to be located within the build-up area (as of 2015). This calculation is slightly different than the target used in *The Way We Grow* but this generally aligns with the intent and direction taken by the City of Edmonton.

The application of these targets to other urban areas in the region will help ensure that all Capital Region Board members are working towards compact growth.

The creation of these targets provides direction to member municipalities that compact growth should occur not only in greenfield areas, but also in existing neighbourhoods. By incorporating density targets for transit-oriented development, it also ensures that transit investments will see improved returns by having greater population within close proximity.

CHANGE MADE: No changes were requested by the City of Edmonton. It is noted that the Alternate Approach (5 dwelling units lower) was approved as the preferred option by the Capital Region Board on July 14, 2016. The minimum greenfield density target for the City of Edmonton is 45 du/nrha.

TOPIC: COUNTRY RESIDENTIAL

REFERENCE: Policy B.4.4.4

PAGES: 60

TYPE: **SUBSTANTIAL**

POSITION: **SUPPORT**

JUSTIFICATION: Policy B.4.4.4 restricts all country residential land to that which was designated or zoned through municipal bylaws as of 2015. Research completed as part of the Growth Plan Update suggests that previously designated and zoned Country Residential lands provide for more than 70 years of supply. This oversupply suggests that further designation/zoning of Country Residential land in the region is not necessary at this time. Recent studies show that 61% of designated/zoned Country Residential land has not yet been absorbed in the region, which equates to 45,156 ha of land.

The Growth Plan Update no longer considers Country Cluster Residential Areas that are found in the existing Growth Plan.

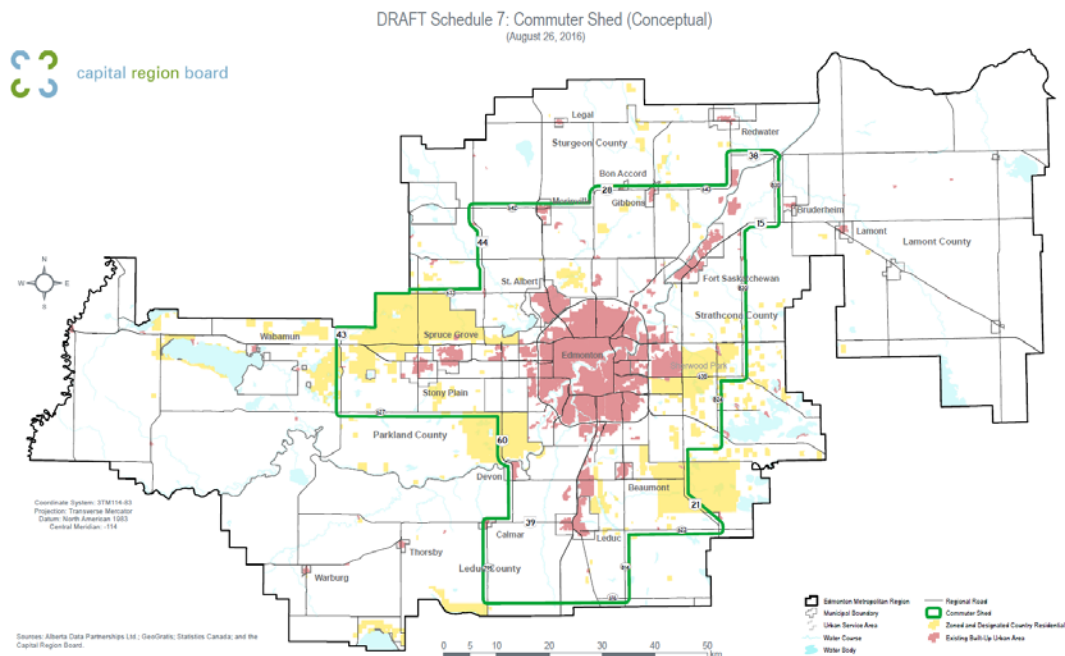
Country Residential development causes significant fragmentation of land which can have impact on agricultural and natural land uses. This can also encumber future urban growth. Restricting any new Country Residential prevents further fragmentation, especially in the context of an oversupply. Ideally, the region could pursue reductions in designated/zoned Country Residential lands given the extent of the oversupply, but that would be challenging to achieve.

CHANGE MADE: No changes were requested by the City of Edmonton. However, a varied approach was selected by the Growth Plan Update Task Force on how to address Country Residential. This was based on concerns raised by the Counties in the region.

A series of conditions are applied to the creation of new Country Residential development.

Changes to the Growth Plan Update from City of Edmonton Feedback

- 90% of existing Country Residential lots must be absorbed.
- Lots proposed are not on prime agriculture land
- Does not exceed 50 parcels per quarter section
- Does not exceed a municipalities 5 year land supply
- At least 2.0 miles (3.6km) from the boundary of an urban municipality in the Rural Area
- At least 3.0 miles (4.8km) from the boundary of an urban municipality in the Metropolitan Area.
- Can be serviced without piped water and sewer.
- Environmental and technical studies will be completed when lots are proposed on or adjacent to natural living systems.
- Proposed Country Residential shall be accommodated through a statutory plan that is subject to the Regional Evaluation Framework process.
- No new net Country Residential will be considered within the commuter shed as defined by the following map.



TOPIC: ALIGNMENT WITH GROWTH PLAN

REFERENCE: Policy C.5.1.2 and C.5.1.3

PAGES: 85

TYPE: **SUBSTANTIAL**

POSITION: **SUPPORT**

JUSTIFICATION: One of the weaknesses of the existing Growth Plan was that there were no specific mechanisms or timelines for municipalities to come into compliance. The Growth Plan Update proposes two mechanisms to ensure compliance. The first is Regional Context Statements. These would be adopted by Councils to state how they intend to come into compliance with the Growth

Plan. A Regional Context Statement must be adopted within 1 year of Provincial approval of the Growth Plan.

The second piece is Municipal Development Plans. All municipalities required to have a Municipal Development Plan will need to bring them into compliance with the Growth Plan within three years of Provincial approval. This can be completed either through an amendment of the Municipal Development Plan or through a regular comprehensive review if it falls within the appropriate timeframe.

These two mechanisms provide additional certainty that the Growth Plan will be implemented at the municipal level and that the principles of the plan will truly help guide growth in the region.

TOPIC: NON-STATUTORY PLANS

REFERENCE: Section C.5.2.2

PAGES: 86

TYPE: SUBSTANTIAL

POSITION: SUPPORT

JUSTIFICATION: Within the existing Growth Plan, there are requirements for certain statutory plans to be reviewed and approved to ensure compliance. This helps maintain consistency with municipal planning documents and the regional Growth Plan. In some past instances, municipalities have used non-statutory planning documents to accommodate growth, which are not subject to review by the Capital Region Board.

The draft Growth Plan Update includes a recommendation to the Province to require that growth within the region be captured within a statutory plan. Should this be implemented, it would be a positive step to closing a loophole where circumventing the requirements of the Growth Plan was possible by using non-statutory plans.

TOPIC: REFERRAL OF NON-STATUTORY MASTER PLANS

REFERENCE: Section C.5.2.3

PAGES: 86

TYPE: SUBSTANTIAL

POSITION: SUPPORT

JUSTIFICATION: The draft Growth Plan Update would require that certain non-statutory master plans be referred to the Capital Region Board for comment. Plans included in this consideration would be agriculture master plans and transportation master plans. The referral process would allow the Capital Region Board administration to review and provide comment on alignment with the Growth Plan. No formal approval process is included.

This approach allows for feedback to be provided by the Capital Region Board to ensure consistency with the Integrated Regional Transportation Master Plan and

the Regional Agriculture Master Plan (to be developed). This process also respects the autonomy of municipalities to implement their own planning documents.

TOPIC: SPECIAL STUDY AREAS

REFERENCE: Section C.5.2.4.2

PAGES: 87

TYPE: **SUBSTANTIAL**

POSITION: **SUPPORT**

JUSTIFICATION: The application of Special Study Areas allows municipalities to work sub-regionally to address areas that require special policy considerations within a specific geographic area. Each special study will need to be initiated through the Capital Region Board and be consistent with the principles of the Growth Plan. This is a helpful tool for situations where the policy tiers in the Growth Plan are not able to address the complexity that may exist.

The first area to be considered is Sturgeon Valley north of Edmonton. Work is currently underway between Sturgeon County, City of St. Albert and City of Edmonton on the Sturgeon Valley Special Study Area. The outcomes of this work is expected to ultimately be captured within the Growth Plan in the future.

CHANGE MADE: No changes were requested by the City of Edmonton. Based on a suggestion of Sturgeon County, a specific reference to the Sturgeon Valley Special Study Area has been added to the Final Draft as Policy B.4.4.5.

Additional details on Special Study Areas in general were added as Policy C.5.2.4.2. This Policy includes parameters of what shall be completed for consideration of a Special Study Area.

TOPIC: FUTURE GROWTH PLAN UPDATES

REFERENCE: Section C.5.2.5

PAGES: 88

TYPE: **SUBSTANTIAL**

POSITION: **SUPPORT**

JUSTIFICATION: Current Capital Region Board regulation requires the update of the Growth Plan every 5 years. The completion of the current review will take nearly two years to complete. To prevent a cycle of nearly constant review, the draft Growth Plan Update proposes to have a five year interim review and a ten year comprehensive review. This change has been suggested to provide a larger window between comprehensive reviews and allow for a less intensive review to occur in between comprehensive reviews.

This would reduce the amount of municipal resources needed to support a comprehensive review every five years.

CHANGE MADE: No changes were requested by the City of Edmonton. An additional update timelines was added in the Final Draft in Policy C.5.2.5.1. This Policy allows for a Two-Year update of the Growth Plan to accommodate the results of the Regional Agriculture Master Plan and the Land Evaluation and Site Assessment (LESA) Tool. Both of these projects are prescribed to be completed by the Final Draft.

STREAM 2

TOPIC: INCLUSIONARY ZONING

REFERENCE: Objective B.3.3
PAGES: 52
TYPE: SUBSTANTIAL
POSITION: SUPPORT WITH CHANGES

CHANGE REQUIRED: Consider the addition of expectations around inclusionary zoning in policy under Objective B.3.3.

JUSTIFICATION: The direction of the Bill 21: the *Modernized Municipal Government Act* suggests that inclusionary zoning will be an option available to municipalities upon the legislation being approved. Setting expectations regionally around inclusiveness would help address market affordable housing in built-up areas and promote a diversity of housing options. Infill projects can increase housing costs and push those with lower incomes to outer areas of the City or region, which in turn causes higher transportation costs. While regional direction would be helpful, ultimately it should be up to municipalities to determine how to best implement inclusionary zoning.

CHANGE MADE: An additional policy was created to address this requested change. Policy B.3.3.2 (b) was added.

TOPIC: PROXIMITY OF MARKET AFFORDABLE HOUSING AND NON-MARKET HOUSING TO TRANSPORTATION

REFERENCE: Policy B.3.3.3
PAGES: 52
TYPE: SUBSTANTIAL
POSITION: SUPPORT WITH CHANGES

CHANGE REQUIRED: An additional focus on proximity to transportation/transit options should be part of the consideration of locating affordable and non-market housing and increase the scope of where they are located within Edmonton.

JUSTIFICATION: Policy B.3.3.3 is prescriptive in directing affordable housing and non-market housing to Centres across the region, including rural centres, sub-regional centres, urban centres, TOD centres and downtown Edmonton. By being prescriptive, and by directing these parts of the housing spectrum to

centres, it loses focus on one of the key criteria for locating affordable and non-market housing: proximity to transportation options.

Focusing affordable housing and non-market housing to downtown Edmonton is contrary to our internal policies. We recommend that this policy be less prescriptive as it relates to the City of Edmonton so that our policies can be followed in directing these housing types across the municipality.

CHANGE MADE: This Policy was revised to include a reference to locating affordable and non-market housing within close proximity of a transit station. .

TOPIC: CONCEPTUAL POLICY TIERS

REFERENCE: Schedule 2: Edmonton Metropolitan Structure to 2044

PAGES: 27

TYPE: SUBSTANTIAL

POSITION: SUPPORT WITH CHANGES

CHANGE REQUIRED: Additional clarification should be provided on how application of conceptual policy tier lines will be applied to real property lines.

JUSTIFICATION: The existing Growth Plan used Priority Growth Areas to identify where urban growth should occur and used conceptual lines to distinguish their extent. When development was proposed near the conceptual boundaries it precipitated the need to specifically delineate the extent of the Priority Growth Area. Given that the policy tiers in the Metropolitan Structure (Schedule 1) are also conceptual, a similar interpretation issue could be anticipated and mitigated.

CHANGE MADE: No additional clarity was provided on this request in the Final Draft. It was indicated that there would be Implementation Guidelines created to provide further guidance, however no timelines are provided.

TOPIC: POPULATION AND EMPLOYMENT FORECASTS

REFERENCE: Policy B.6.2.4 (b) and other various policies

PAGES: 79 and other various pages

TYPE: SUBSTANTIAL

POSITION: SUPPORT WITH CHANGES

CHANGE REQUIRED: A consistent approach to the application of population and employment forecasts as a tool throughout the Growth Plan Update.

JUSTIFICATION: Population and employment forecasts are used in the existing Growth Plan as a measurement to evaluate development proposals from municipalities for consistency. The forecasts have been used as a maximum to prevent proposals coming forward that exceed the projected population and/or employment numbers. This method has been seen as too restrictive by the Task Force and the draft Growth Plan Update was expected to make the forecasts a flexible guideline rather than seen as a maximum.

Generally this approach is applied through the draft, but in Policy B.6.2.4 (b) there is a suggestion that the forecasts will be used to evaluate the need for converting prime agricultural lands for non-agricultural uses in the Metropolitan Area. Clarity is needed to determine to what extent the forecasts will be used to determine the need for urban growth in the context of this policy.

CHANGES: The reference to population and employment forecasts in policy B.6.2.4 (b) was removed.

TOPIC: GRANDFATHERING

REFERENCE: Section C.5.1.1
PAGES: 85
TYPE: **SUBSTANTIAL**
POSITION: **SUPPORT WITH CHANGES**

CHANGE REQUIRED: Additional clarity is needed on how existing Statutory Plans that are amended will be subject to the requirements of the Growth Plan Update.

JUSTIFICATION: The requirements for conformance of statutory plans with the Growth Plan will need to be explicitly outlined in the final draft document. The current draft includes a reference to grandfathering of existing statutory plans (except municipal development plans) but does not provide additional detail on how amendments to those documents will be required to comply with the Growth Plan. Additional materials on this topic have been generated by the Capital Region Board, but are not captured in the draft Growth Plan Update.

For statutory plans subject to future grandfathering, policy direction should be added so that municipalities are encouraged to meet or exceed current density targets of the statutory plan.

CHANGES: No substantial changes were made in the Final Draft but further detail is anticipated to be provided through the updates to the Regional Evaluation Framework 2.0 process.

TOPIC: IMPLEMENTATION

REFERENCE: Various
PAGES: Various
TYPE: **SUBSTANTIAL**
POSITION: **SUPPORT WITH CHANGES**

CHANGE REQUIRED: There are several examples where clarification is needed to explain how implementation of proposed policies will be undertaken through the Growth Plan Update.

JUSTIFICATION: A key challenge that was identified in the review of the existing Growth Plan was that it had a relatively strong policy set, but lacked direction on

how to implement the policies. In particular, the mandatory provisions of the Growth Plan Update will need direction on how they will be enforced.

The lack of implementation direction has been observed in several areas of the draft Growth Plan Update. Examples are provided below:

- Section B.4 (pg 54): Guiding Principle 4 suggests that growth should be prioritized where infrastructure exists. While this efficiency-based approach is advisable, it is not clear how this will be achieved or advanced given the current land development model that responds to development rather than anticipate it.
- Policy B.1.2.5 (f) (pg 36): This policy outlines criteria for employment lands to be converted to non-employment lands. One of those criteria is that the land is deemed to not be regionally significant. This is a great example of policy direction that is vague and requires clearer direction in order to be applied in a consistent manner.
- Policy B.2.3.3 (pg 46): This policy suggests approaches to maintain ambient air quality as a high priority through statutory planning documents. Further direction would be helpful to understand what is required to be included in a statutory plan.
- Policy B.2.1.5 (pg N/A): While the policy direction to preserve conservation buffers to maintain ecological functions and connections outside the region is sound, there are not mechanisms in place to implement this policy. In the current regulatory environment, the only option to achieve this, given the demands on municipal reserves, is for municipalities to purchase land.

CHANGES: A series of changes were made to address these comments.

TOPIC: JOINT TRANSIT

REFERENCE: Objective B.5.5, Policies B.5.5.1 to B.5.5.2

PAGES: 75

TYPE: **SUBSTANTIAL**

POSITION: **SUPPORT WITH CHANGES**

CHANGE REQUIRED: Additional direction could be provided on how the region can work together to deliver intermunicipal transit services.

JUSTIFICATION: The Capital Region Board Regulation (AR 38/2012) outlines a requirement for the Capital Region Board to pursue joint transit collaboration. The draft Growth Plan Update does not provide significant direction on this matter. Further detail could be included under Objective B.5.5. The work of the Capital Region Board Transit Committee and the bilateral discussion between City of Edmonton and City of St. Albert suggest that this is an emerging topic that needs more direction in the Growth Plan Update.

CHANGES: A new Policy (B.5.2.1) was added to the Final Draft to address this requested change.

TOPIC: KEY PERFORMANCE INDICATORS

REFERENCE: Appendix F: Key Performance Indicators

PAGES: 120-121

TYPE: **SUBSTANTIAL**

POSITION: **SUPPORT WITH CHANGES**

CHANGE REQUIRED: Further details should be provided so that the expectations of member municipalities, and the data they will be required to provide is clear. There should also be additional information/linkage between the list of Key Performance Indicators (KPIs) and the specific policies which they are meant to measure.

JUSTIFICATION: The intention may be that these indicators are left general to provide flexibility in the future, but as currently proposed it will likely cause confusion as these indicators are not clear. For example, the indicator *housing diversity and affordability* will likely require multiple measurements for accurate reporting as there wouldn't be a single representative metric.

Part of the information used to generate an annual KPI report is expected to be provided by member municipalities. Based on the list of proposed indicators, it's not clear what expectations are in terms of municipalities providing data.

In the creation of KPIs, consistency is an important factor to keep in mind. To be able to monitor progress over time, there needs to be consistency in the data being measured and the correlation to the desired outcomes you are tracking. For that reason, there should be as much detail as possible in this list of KPIs in terms of the specific metrics being measured and the responsibilities of member municipalities in providing data.

CHANGES: Key Performance Indicators were moved into an Appendix with additional details provided.

TOPIC: AGRICULTURAL PRESERVATION

REFERENCE: Objectives B.6.1 and B.6.2, Policies B.6.1.1 to B.6.2.5

PAGES: 76-81

TYPE: **SUBSTANTIAL**

POSITION: **SUPPORT WITH CHANGES**

CHANGE REQUIRED: Additional clarity should be provided on how Agriculture Impact Assessments will be used.

JUSTIFICATION: The approach taken in the Growth Plan Update is a large step forward for the region in preserving agricultural land and promoting the agricultural sector. This advancement has also been balanced with the need for urban growth to accommodate the population and employment forecasts of this plan.

The Growth Plan Update takes a multi-faceted approach to agriculture. This includes:

- new policies that keep agricultural land in production for as long as possible in the urban fringe,
- restrictions on fragmentation,
- criteria for conversion,
- preservation in appropriate circumstances, and
- requirements for the completion of a Regional Agricultural Master Plan and the implementation of the Land Evaluation and Site Assessment (LESA) tool to follow the adoption of the Growth Plan Update.

Further to the new policy direction in the Growth Plan Update relating to agriculture, there are significant savings in land consumption expected with the application of higher density targets. Under the policies of the existing Growth Plan, it is anticipated that approximately 760 quarter sections would be consumed for growth in urban and rural areas over the timeframe of the plan. With the proposed density targets this is projected to decrease to approximately 400-500 quarter sections of land consumed.

Until such time as the Regional Agricultural Master Plan and LESA are completed, an interim policy direction is proposed that uses the Land Suitability Rating System (LSRS) to identify prime agricultural lands. Both in the interim, and after completion of future agricultural studies, Agricultural Impact Assessments (Policy B.6.2.3d) will be used to determine the impact of urban growth on adjacent agricultural lands. The intent of this method is to show where adverse impacts are anticipated and that mitigation be provided. These assessments will also be considered as part of the Regional Evaluation Framework process.

If the applicable policies on Agricultural Impact Assessments are interpreted strictly (no adverse effect), it could be used as a method to block urban growth, when the intention is to provide adequate and appropriate transition between urban and nearby agricultural areas. The interface between urban development and agricultural areas is suggested to be mitigated by using buffers/setbacks with spatial barriers such as landscaping, fencing and berming. This approach may cause resistance from the development community as the use of geographic separation as a mitigative measure may impact the viability of a parcel of land.

CHANGES: A new policy (B.6.2.5) was created to provide additional clarity on the process and requirements of Agriculture Impact Assessments.

TOPIC: GREENFIELD AREAS

REFERENCE: Section B.4.3.2 (a)

PAGES: 58

TYPE: **SUBSTANTIAL**

POSITION: SUPPORT WITH CHANGES

CHANGE REQUIRED: Remove the words “or adjacent.”

JUSTIFICATION: The intent of the additional language here was to allow for the development of the Bremner growth area in Strathcona County, but this provision could open the possibility for additional growth options that are not intended.

CHANGES: The suggested change was made as requested.

TOPIC: RESOURCING FOR FUTURE WORK

REFERENCE: Section C.5.4 and Appendix A: Resource Plan

PAGES: 90-91, 110

TYPE: SUBSTANTIAL

POSITION: SUPPORT WITH CHANGES

CHANGE REQUIRED: The Growth Plan Update should take into account current economic circumstances at the Capital Region Board. There will likely be a need for cost-sharing for regional projects and advocacy to seek external funding sources where appropriate.

JUSTIFICATION: With a limited budget going forward to cover operating costs, it will be challenging for the Capital Region Board and its members to expect that these projects can be completed without more direction on resourcing/funding. Assuming that external funding will not be able to cover all costs, it is likely that Capital Region Board members will still need to contribute for certain projects to be completed.

CHANGES: A list of anticipated future projects for the Capital Region Board emanated from the new Regional Growth Plan have been moved into Appendix A. This list has additional information on potential funding sources.

TOPIC: GREENFIELD DENSITY TARGETS

REFERENCE: Objective B.4.3, Policy B.4.3.1 and C.5.7.1

PAGES: 58, 94-95

TYPE: SUBSTANTIAL

POSITION: SUPPORT WITH CHANGES

CHANGE REQUIRED: There is potential that the density targets need to be revised based on technical analysis that is still underway. Consideration should be provided to allow for large-scale plans (Area Structure Plans) to achieve the proposed density targets across its extent, with flexibility for smaller scale planning (Neighbourhood Structure Plans) that may dip below the minimum density target but would be offset with others within the ASP that exceed.

JUSTIFICATION: For the most part, when greenfield density targets were established in the existing Growth Plan in 2010, development was able to meet the targets across the region with minimal difficulty. In Edmonton, these targets ranged

from 25-40 dwelling units per net residential hectare (du/nrha). In the draft Growth Plan Update, the proposed density target for Edmonton is 50 du/nrha, while St. Albert, Sherwood Park and Leduc County (West of QEII) are 45 du/nrha. All other urban municipalities in the Metropolitan Area are subject to a target of 40 du/nrha. Towns, villages, growth hamlets and hamlets outside the Metropolitan Area are also subject to lower targets.

It is important to note that due to grandfathering clauses set out in the implementation section of the plan, there is no expectation of any impact to existing areas within Edmonton. The new greenfield density targets apply only to new statutory plans, of which none are anticipated within the current City boundaries.

The City of Edmonton supports higher density targets than the current ones applied to Priority Growth Areas. Administration recommends a higher target be established since a goal of the plan is to minimize the development footprint of the region and create efficiencies for infrastructure use. In this regard, Edmonton can demonstrate leadership for the long-term sustainability of the region. In addition, all municipalities under the Capital Region Board show increased density targets in this proposed plan which shows a collective approach to achieving the benefits of higher density.

The added flexibility around the scale of plans would allow for smaller scale plans to be both above and below the density targets, while at the larger scale (ASP) the entire area complies. This type of flexibility does not appear to be provided in the draft Growth Plan Update and would add flexibility around concentrating density in towns centres or TOD areas.

The development industry has expressed concerns on the current version of proposed density targets. To help provide additional details on the proposed density targets, administration is in the process of completing further evaluation/visualization of the potential impacts of the proposed density targets on new greenfield development. Based on that work, illustrative examples of increased density may provide more certainty around the feasibility of these targets.

CHANGES: A new policy (C.5.7.1) was created to address the need for flexibility across various scales of plans, where applicable.

STREAM 3

No topics are included in the draft Growth Plan Update require non-support.

STREAM 4

TOPIC: NUMBERING

TYPE: EDITORIAL

CHANGE NEEDED: The numbering of policies and sections in the document needs to be revised. The policy numbers used in Chapter 4, Policy Area 5 overlap with Chapter 5. This causes confusion when referencing specific policy numbers.

CHANGE MADE: Yes.

REFERENCE: Section A.1.1

PAGES: 2

TYPE: EDITORIAL

CHANGE NEEDED: The Introduction portion of this document refers to encouraging a mode shift towards more public transit as opposed to the private automobile. This statement should also include active modes of transportation in concert with public transit as alternatives to private automobiles in pursuing mode shift.

CHANGE MADE: Yes.

REFERENCE: Section 3.2 - Compact and Contiguous Development

PAGES: 22

TYPE: EDITORIAL

CHANGE NEEDED: Under the heading of “Compact and Contiguous Development” there is a list of mixed use and higher density development types. The wording around this list makes it appear inclusive, when it should be used as exemplification as there are many other examples that could be referenced.

CHANGE MADE: Yes.

REFERENCE: Section 3.3 - Built-Up Urban Area

PAGES: 26

TYPE: EDITORIAL

CHANGE NEEDED: Under the definition for “Built-Up Area” there is a reference for an established timeframe used to define the built-up area for each municipality. Within that reference, there is no specific timeframe provided but rather two examples: e.g. 2015 or time of plan adoption. This should be clarified so that the implementation of this tool is consistent across the region.

CHANGE MADE: Yes.

REFERENCE: Section 3.3 - Downtown Edmonton

PAGES: 26

TYPE: EDITORIAL

CHANGE NEEDED: Under the fourth bullet under “Edmonton Metropolitan Region Structure Plan” there is a reference to *non-motorized transit* that should be changed to *non-motorized transportation*.

CHANGE MADE: Yes.

REFERENCE: Policy Area #1, 3rd Paragraph

PAGES: 29

TYPE: EDITORIAL

CHANGE NEEDED: References to Alberta’s Industrial Heartland indicate that it is located in the Rural Area policy tier. This is partially accurate, but there is a portion of the Heartland in the City of Edmonton which is located within the Metropolitan Area policy tier.

CHANGE MADE: Yes.

REFERENCE: Policy Area #2, 3rd Paragraph

PAGES: 43

TYPE: EDITORIAL

CHANGE NEEDED: There is a reference to First Nation’s peoples in this preamble which should probably be Indigenous peoples.

CHANGE MADE: Yes.

REFERENCE: Policy 2.2.1 (d)

PAGES: 44

TYPE: EDITORIAL

CHANGE NEEDED: Recommend updating this policy to read: “c. protecting wetlands with sufficient buffers to maintain their water quality and hydraulic function, as well as, upland habitat necessary to support the life cycle needs of the wetland ecosystem.”

CHANGE MADE: Yes.

REFERENCE: Policy 2.2.3

PAGES: 44

TYPE: EDITORIAL

CHANGE NEEDED: Add the word “guidelines” following federal acts, and regulations.

CHANGE MADE: Yes.

REFERENCE: Policy 2.3.2

PAGES: 46

TYPE: EDITORIAL

CHANGE NEEDED: This policy could also include consideration for energy conservation in addition to recovery and green energy.

CHANGE MADE: Yes.

REFERENCE: Policy 2.4.1

PAGES: 46

TYPE: EDITORIAL

CHANGE NEEDED: Additional consideration for the maintenance and restoration of wildlife passageways should be considered within this policy.

CHANGE MADE: Yes.

REFERENCE: Section 3.1.4 (g)

PAGES: 51

TYPE: EDITORIAL

CHANGE NEEDED: The wording of this policy needs to be adjusted to reflect that not all transit stops in the region would incorporate higher density, but rather just major stops.

CHANGE MADE: Yes.

REFERENCE: Policy 4.2.2

PAGES: 57

TYPE: EDITORIAL

CHANGE NEEDED: This policy outlines several areas where intensification will be directed in the region, but omits significant areas of Edmonton where intensification is being pursued. For example, only a portion of the Mature Neighbourhood Overlay would be captured within TOD Centres, brownfield areas or downtown Edmonton.

CHANGE MADE: Yes.

REFERENCE: Policy 4.3.1 (c)**PAGES:** 58**TYPE:** EDITORIAL

CHANGE NEEDED: This policy can be read to state that the minimum greenfield density targets could be relaxed in scenarios where they are deemed to not be realistic by the municipality. This is not the expected intent of this policy and should be reworded accordingly. The intent of this policy is to ensure that the densities included in a statutory plan are consistent with what ends up being built.

CHANGE MADE: Yes.

REFERENCE: Policy 4.3.3 (b)**PAGES:** 58**TYPE:** EDITORIAL

CHANGE NEEDED: Allowing growth to occur adjacent to an area with planned infrastructure may invite opportunities for leapfrogging which would go against the goal of promoting compact and contiguous growth in the region.

CHANGE MADE: Yes.

REFERENCE: Policy 4.3.5**PAGES:** N/A**TYPE:** EDITORIAL

CHANGE NEEDED: While this concept addresses a concern raised by industry, it has a very narrow set of potential solutions and needs additional clarity on how it could be implemented appropriately.

CHANGE MADE: Yes.

REFERENCE: Policy 5.2.1 (c)**PAGES:** 74**TYPE:** EDITORIAL

CHANGE NEEDED: This policy refers to improving accessibility but there needs to be further clarity on what is trying to be achieved by improving accessibility. Accessibility for persons with disabilities should be pursued across all transit systems in the region. If that is not what is intended, perhaps this is referring to improving access of transit to more areas. This may be getting into a debate surrounding coverage versus ridership which is one of the key considerations of Edmonton's Transit Strategy work that is underway.

CHANGE MADE: Yes.

REFERENCE: Policy 5.2.2 (b)**PAGES:** 74**TYPE:** EDITORIAL

CHANGE NEEDED: The wording of this policy suggests that park and rides could be located at all LRT stops in the region. Suggest adding wording to reflect a qualifier that park and rides could be considered at LRT stops and other major transit stations in configurations where it will not inhibit transit oriented development.

CHANGE MADE: Yes.

REFERENCE: Policy 5.2.2 (d)**PAGES:** 74**TYPE:** EDITORIAL

CHANGE NEEDED: This policy provides direction that bus service in the Metropolitan Core be provided at similar levels of service to LRT. It is not clear if this is something that Edmonton would want to pursue without the results of the Edmonton Transit Survey.

Also this policy contemplates several types of transit including commuter rail within the Metropolitan Core. As commuter rail will likely need connections to the Metropolitan Area, this policy should be broadened to include it.

CHANGE MADE: No.

REFERENCE: Policy Area #5**PAGES:** 68-75**TYPE:** EDITORIAL

CHANGE NEEDED: The Trans-Canada Trail could be added as a corridor within various components of this Policy Area.

CHANGE MADE: Yes.

REFERENCE: Objective 6.1**PAGES:** 76**TYPE:** EDITORIAL

CHANGE NEEDED: This Objective could be interpreted that the region needs to secure enough food sources to feed the entire region. This is likely not the intent and should be rewritten in the context of securing an appropriate amount of food sources.

CHANGE MADE: Yes.

REFERENCE: Schedule 2, 3A and 6

TYPE: EDITORIAL

CHANGE NEEDED: Schedule 2 and 3A show a TOD Centre at Crossroads/Nisku in Leduc County, but there is no corresponding TOD Centre density target applied to Leduc County (West of QEII) in Schedule 6.

CHANGE MADE: Yes.

REFERENCE: Schedule 7

TYPE: EDITORIAL

CHANGE NEEDED: The amount of content and layers on this map make it difficult to read and interpret.

CHANGE MADE: Yes.

REFERENCE: Schedule 4

PAGES: N/A

TYPE: EDITORIAL

CHANGE NEEDED: Additional data will be shared by the City of Edmonton that includes municipally environmental sensitive areas.

CHANGE MADE: No.

REFERENCE: Schedule 8

TYPE: EDITORIAL

CHANGE NEEDED: Schedule 8 outlines buffers for heavy industrial uses, and specifically for Alberta's Industrial Heartland. Buffers for the Edmonton Energy and Technology Park could also be included.

CHANGE MADE: No.

REFERENCE: Schedule 9A

TYPE: EDITORIAL

CHANGE NEEDED: The northeast river crossing connecting Highway 21 and Highway 28A currently has a function study underway. As part of that study, this highway link has been identified as a freeway rather than as an expressway as referenced on this schedule.

CHANGE MADE: No.