

Regional Policy Alignment Analysis

Our Future Valley: Sturgeon Valley South Area Structure Plan



1.0 INTRODUCTION

This document mirrors Sturgeon County's submission to the Regional Evaluation Framework (REF) for the Edmonton Metropolitan Region Board (EMRB). It is being shared ahead of the REF submission with our municipal neighbours to assist with the inter-municipal evaluation process and for transparency and expediency with regards to the wider REF process.

Pursuant to Ministerial Order MSL 111/17, the Province of Alberta adopted the Regional Evaluation Framework (REF) for the Edmonton Metropolitan Region Board (EMRB) to ensure consistency and alignment with the Edmonton Metropolitan Region Growth Plan (EMRGP) and the Edmonton Metropolitan Region Board Regulation. As such, certain statutory documents from member municipalities require review to ensure compliance.

Section 4.0 of the REF states that a member municipality must refer proposed statutory plans or statutory plan amendments to the EMRB under certain conditions, after the first reading by Council and prior to the third reading pursuant to Section 5.1 of the REF. The application will be referred to the EMRB due to the criteria under Section 4.1 of the REF new statutory plan's must be admitted to the Board.

2.0 PURPOSE

Bylaw 1555/21 will be presented to the Sturgeon County for first reading on 8 June 2021. The purpose of the is to review the amendments to the Municipal Development Plan and new Sturgeon Valley Area Structure Plan for consistency with the EMRGP.

3.0 BACKGROUND INFORMATION

Municipality:	Sturgeon County
First Reading Date:	8 June 2021
Location:	Sturgeon Valley, Sturgeon County (Online)
Purpose of the MDP updates and new ASP:	The Sturgeon Valley South Area Structure Plan is a statutory document established to outline the future land uses and provide a framework to enable development of the land designated for the lands described as Areas A, B1 and B2 in Appendix G Negotiated Policies for the Sturgeon Valley Special Study Area in the EMRGP. The Area Structure Plan (ASP) creates a framework for a series of five Planning Areas that require the development of a Neighbourhood Area Structure Plan to provide greater detail of planning as guided by the ASP, of which two of the Planning Areas have been approved to proceed in their development with the remaining requiring an amendment to the ASP and referral back to the EMRB.

Summary of the Referral

The evaluation of the proposed Sturgeon Valley Area South Area Structure Plan was carried out in relation to the Guiding Principles of the Growth Plan, the Objectives and Policies of the Growth Plan – in particular the Special Study Area policy, and the evaluation criteria in the Regional Evaluation Framework (REF).

4.0 EVALUATION CRITERIA

Applicable Policy Tiers

The Sturgeon Valley Special Study Area policy tier is defined as: *The Sturgeon Valley Special Study Area (SVSSA) includes lands contained within the current in-force statutory plan for the area (Sturgeon Valley Area Structure Plan); being those lands contained within the area of Highway 37 to the north, Highway 28 to the east, Range Road 253 to the west and the city boundaries of St. Albert and Edmonton to the south/southwest. Internal boundaries have also been established to guide the development of required policy. This has resulted in the creation of four core areas known as:*




- » **Area A** - Includes lands currently under the City of St. Albert annexation process and will involve the development of an Area Structure Plan in accordance with the objectives and policies provided in Section 3.
- » **Area B1/B2** - Includes lands that will involve development of an Area Structure Plan in accordance with the objectives and policies provided in Section 3.
- » **Area C** - Contains the existing Sturgeon Valley community; an established serviced rural residential development containing approximately 3,400 residents. This Valley Core includes 33 multi-lots nearing 86% built-out, with 1,452 approved/registered lots.
- » **Area D** - Includes lands that will be retained for primarily agricultural purposes. Area D will be protected and maintained to enable efficient agricultural production and support the agricultural industry in the Region.


Edmonton Metropolitan Regional Structure Policy Tier	Applicability
Sturgeon Valley Special Study Area	Applicable

The guiding principle of the SVSSA is: *Sturgeon County, in collaboration with the City of St. Albert and City of Edmonton, will plan for the completion of the Sturgeon Valley in a contiguous, compact manner with transitions that are sensitive to existing established communities, surrounding agricultural area and metropolitan boundaries.*

The applicable growth directions for the **Sturgeon Valley Special Study Area** are:

1. The Sturgeon Valley Special Study Area shall take precedence over the EMRB Growth Plan Policy Tiers and density targets.
2. Density of development overall shall achieve a minimum of 35du/nrha with up to 125 du/nrha around a proposed transit center.
3. Plan development will vary in density to create a transitional gradient between the established Sturgeon Valley community and the urban areas of Edmonton and St. Albert.
4. Future extension of 127 Street will be in general accordance with the outcomes of the Edmonton Metropolitan Region Board's Integrated Regional Transportation Master Plan.
5. Inclusion of a comprehensive Fiscal Impact Assessment that illustrates the full life-cycle development costs.
6. Collaboration with neighbouring planning partners on issues of common interest.


PRINCIPLES + OBJECTIVES	CONSISTENCY	EVALUATION + COMMENTARY
<div data-bbox="203 342 337 499">  </div> <div data-bbox="378 321 1399 520"> <p>GUIDING PRINCIPLE</p> <p>Sturgeon County, in collaboration with the City of St. Albert and City of Edmonton, will plan for the completion of the Sturgeon Valley in a contiguous, compact manner with transitions that are sensitive to existing established communities, surrounding agricultural area and metropolitan boundaries.</p> </div>		
<p>3.1.1: While negotiated Policies relating to the Sturgeon Valley Special Study Area (SVSSA) shall take precedence over the EMRB Growth Plan Policies Tiers and density targets, all other Growth Plan policies will continue to apply.</p>		<p>The Sturgeon Valley Special Study Area policy is listed below and demonstrates compliance with the density targets that have been established. Following this table is an analysis of the other Growth Plan policies considered applicable to the Sturgeon Valley South Area Structure Plan (referred to hereafter as the “Plan”) .</p>
<p>3.1.2 Area structure plans(s), led by the jurisdictional municipality, for areas a and b require consideration of the following:</p> <p>a. Density of development in Areas A and B shall achieve an overall minimum of 35 du/nrha. This is comprised of minimum densities of 35 du/nrha in Areas A and B2, 20 du/nrha in Area B1, and up to 125 du/nrha around a proposed transit centre (see policy 3.1.3). Plan developments will vary in density but will be managed to ensure that overall area minimums are maintained or surpassed.</p>		<p>The Plan sets out a transitional gradient land use (as indicated in Figure 9: Concept Plan) that achieves an overall minimum density requirement of 35 du/nrha across all planning areas and a summation of all the densities that are in accordance with the density targets for Areas A and B. This is exemplified in Figure 11: Full Build Out, by dividing the total number of units/nrha by the total residential area; this number equates to 35du/nrha.</p>


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<p>3.1.2: b. Within the overall density target above, development will demonstrate a gradient/transitioned approach. This ensures that:</p> <ul style="list-style-type: none"> I. The character and built form of the established Sturgeon Valley community (Area C) is protected, such that higher densities shall be applied progressively between that community and the urban areas of Edmonton and St. Albert (areas E and F); and II. Higher densities are available to provide fiscal support for required infrastructure investments. 		<p>The Plan sets out objectives to meet the overall 35 da/nrha goal while being sensitive of the density and urban form within the ASP areas that border Area C (refer to objective 5.2.1). The related policy states that transitional density levels shall be in general accordance with Figure 9 (refer to policy 5.2.1.1). Additional policy outlines tools to further guide the development of Neighbourhood Area Structure Plans (known as NASPs) to assist with transitional development (refer to Plan policies 5.2.1.2 and 5.2.1.3).</p> <p>The Plan has supporting policy through the transitional development gradients that create higher densities to support infrastructure investments as guided by the density gradient in Figure 9 and policies that speaks to clustering of multi-unit residential along public transit routes and higher minimum densities around the future transit hub (Plan policy 5.3.1.3 and objective 5.10.3).</p>

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<p>c. The future extension of 127 Street will be in general accordance with the outcomes of the Edmonton Metropolitan Region Board's Integrated Regional Transportation Master Plan. The future corridor for the extension of 127 Street will be further refined and protected as determined by Area Structure Planning across the entire planning area with input from Edmonton, St. Albert, and Sturgeon County.</p>	<p>✓</p>	<p>Section 5.10 of the Plan sets out transportation objectives to facilitate the movement of people, goods, and services within the Sturgeon Valley region and beyond. See Figure 15 for the Transportation Plan of the entire Plan Area.</p> <p>Section 1.5.5 of the Plan references the 127 Street Functional Planning Study that was undertaken by ISL that was used to inform the Full Build out Area of the ASP. Policy 5.10.1.1 speaks to the development of NASPs having to be consistent with the overall major road network shown in Figure 15 that includes the alignment of 127 Street.</p> <p>Furthermore, the Plan outlines transportation policy that states that the county shall work with the development community on updating its off-site development levies bylaw to support future major road infrastructure including the 127 Street extension.</p>
<p>d. A variety of non-residential developments will be incorporated within the planning areas to provide diverse employment opportunities.</p>	<p>✓</p>	<p>Section 5.4 of the Plan outlines the framework for commercial/mixed use development as a way of creating diverse employment opportunities. Specifically, the framework makes reference to the opportunities that commercial development creates with increased employment opportunities within close proximity to employees.</p> <p>Furthermore, Section 5.5 of the Plan provides a framework to enable light industrial development on the lands (refer to Figure 9). Light industrial development could include warehousing, logistics, flex industrial and light manufacturing activities along Hwy 28 to support the CFB operations (policy 5.5.1.1).</p>


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e. Community amenities will be positioned within a hierarchy of mixed-use centres. Development of mixed-use areas will be consistent with other policies contained within the EMRB Growth Plan.	✓	Section 5.8 of the Plan establishes a number of objectives and supporting policies to provide a range of community services to the Plan area that will be positioned within mixed use centres, such as emergency services. Section 5.10 Transportation clearly outlines a future location for a bus transit hub. Section 5.4 regarding mixed use development also seeks to incorporate design policies which contribute to community amenities, such as complete streets and policy to incorporate pocket parks. While the policy tiers do not apply to the Plan, the urban policies are consistent with those relating to the “Metropolitan Tier” of the Growth Plan through creating diversity in land uses and including design principles consistent with complete communities.
f. Greenspace and protection of natural areas will be incorporated to contribute to an open and connected environment that can be actively used by residents of the community and also may assist with the transitional gradient.	✓	Greenspace and protecting key environmental areas are a critical component of the Plan and are supported by strong policy in guiding the development of the NASPs as outlined through the objectives and policies in Section 5.7: Parks, School, Open Space and Environmental Reserve.
g. Sustainable and innovative design techniques will be promoted to enhance the environment and seek to minimize required capital and operating infrastructure costs	✓	<p>The vision of the Plan as stated in section 4 emphasizes capitalizing on innovative emerging technology and developing in a fiscally responsible manner to create long term resilience.</p> <p>This is further reflected in Section 5.9 of the Plan that recognizes the importance of championing innovative and green development and includes policies that strive to reduce the overall impact on the natural environment.</p> <p>Plan Policy 5.3.2.2 also states that development within the ASP should incorporate Smart City concepts.</p>


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h. Inclusion of a comprehensive Fiscal Impact Assessment that illustrates the full, life-cycle development costs.	✓	In 2020, prior to proceeding with the development of the Plan, a comprehensive fiscal impact assessment was undertaken for the County to understand the impacts of development on capital and operation budgets. The analysis was further updated to reflect the ASP and policy has been incorporated to require future NASPs to continue using the County's model to update the fiscal impact assessment as greater detail is developed enabling the County to monitor and manage the potential impacts prior to development occurring (refer to section 6.1 and 6.2).
i. Collaboration with neighbouring planning partners on issues of common interest.	✓	Section 5.12 of the Plan speaks to Intermunicipal Coordination where the policy speaks to referral process and working together on infrastructure projects. Other sections of the ASP also speak to collaboration with adjoining municipalities regarding community services.
3.1.3 A transit centre (a location where multiple transportation modes, excluding light rail transit, can stop simultaneously to allow transfers between routes) will be located in Area B that could enable development densities between 42 du/nrha and 125 du/nrha. The increased densities in proximity to the transit centre provide the opportunity for the development of a mixture of residential and non-residential uses.	✓	Figure 15 within the Plan highlights the location for a future Bus Transit Centre, with Figure 9 showing the required minimum density of 42du/nrha. Given the anticipated long-term life of the Plan, it recognizes technological changes that also may occur in the future which could result in this form of transit becoming redundant.

PRINCIPLES + OBJECTIVES	CONSISTENCY	EVALUATION + COMMENTARY
<div data-bbox="212 338 375 499">  </div> <div data-bbox="407 359 1289 436"> <p>GUIDING PRINCIPLE</p> <p>Promote global economic competitiveness and regional prosperity.</p> </div>		
1.1: Promote global economic competitiveness and diversification of the regional economy	✓	As recognized by the EMRGP policy, complete communities require nodes of employment that are easy to access. The Plan comprises of both mixed use/commercial and light industrial lands that provide diversification, employment opportunities and serving other communities beyond the Plan extent, such as CFB. The Plan also speaks strongly to using renewable energy and other emerging technologies that will help businesses within the wider region as development proceeds.
1.2: Promote job growth and the competitiveness of the Region's employment base	✓	Sturgeon Valley is a Special Study Area that contains policy that aligns with the EMRGP's principal of developing complete communities. This requires some level of non-residential development to achieve a complete community which has included a variety of land uses which are consistent with the outcomes of the County's Commercial Development Analysis.
1.3: Enhance competitiveness through the efficient movement of people, goods and services to, from and within the Region	✓	Section 5.10 of the Plan emphasizes the important role of transportation connections being critical to the movement of people, goods and services within the plan area and beyond. The ASP also protects the recognized regional 127 Street road alignment.
1.4: Promote the livability and prosperity of the Region and plan for the needs of a changing population and workforce	✓	The Plan framework for Residential Development (Section 5.3) sets out objectives to support a range of choices for housing in accordance of the overall 35 du/nrha set out by the EMRB, while encouraging alternative/innovative housing including affordable housing (5.3.1.2).


PRINCIPLES + OBJECTIVES	CONSISTENCY	EVALUATION + COMMENTARY
<div data-bbox="212 331 370 491">  </div> <div data-bbox="402 359 1154 436"> <p>GUIDING PRINCIPLE</p> <p>Protect natural living systems and environmental assets.</p> </div>		
<p>2.1: Conserve and restore natural living systems through an ecological network approach</p>	<p>✓</p>	<p>The Plan, exemplified from its vision, goals, objectives and policies, has recognized the important natural living systems, such as the Sturgeon River and significant wetlands. It requires greater detailed analysis through the development of NASP and has related policy tying the trail and park systems into the natural living systems.</p>
<p>2.2: Protect regional watershed health, water quality and quantity</p>	<p>✓</p>	<p>Figure 18 within the Plan provides a high-level stormwater management plan for those NASPs that have been approved to proceed that will require greater detailed analysis at their implementation stage. Any future NASPs will need to update the Plan to reflect the future stormwater management within these areas. Policy also supports low impact design techniques in managing stormwater (refer to Section 5.9).</p>
<p>2.3: Plan development to promote clean air, land and water and address climate change impacts</p>	<p>✓</p>	<p>Section 5.9 of the Plan emphasizes the importance of championing innovative development and new technologies that reduce human impact on the land and build in climate resiliency.</p> <p>Energy efficient technology (e.g. LED lighting), net zero carbon buildings and the inclusion of low impact design into the development, and the incorporation of solar and other renewable technologies shall be encouraged by the County (policies 5.9.1.1-5.9.1.3 and 5.9.1.6).</p> <p>Furthermore, the County shall work with developers on incorporating climate adaption design standards and initiatives (5.9.1.5).</p>


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2.4: Minimize and mitigate the impacts of regional growth on natural living systems	✓	The development of a NASP is required to carry out in field biophysical investigations to identify key environmental features to protect. Throughout the Plan there are objectives and policies that look to incorporate low impact design technologies while also being open to emerging technologies that reduce the impacts on the natural living systems.

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 <p>GUIDING PRINCIPLE Recognize and celebrate the diversity of communities and promote an excellent quality of life across the Region.</p>		
3.1: Plan and develop complete communities within each policy tier to accommodate people's daily needs for living at all ages	✓	The purpose of the Sturgeon Valley South ASP is to provide a development framework for creating complete communities.
3.2: Plan for and promote a range of housing options	✓	The Plan provides for a variety of housing options from low to high density residential shown in Figure 9 coupled with policy that encourages a range of housing choices (Plan policies 5.3.1.2, 5.3.1.3).
3.3: Plan for and promote market affordable and non-market housing to address core housing need	✓	Plan policy 5.3.1.4 states that alternative/innovative housing should be encouraged. This may include net zero housing, affordable housing, tiny homes, and 3D printed dwellings.

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<div data-bbox="207 331 370 499">  </div> <div data-bbox="402 359 1273 432"> <p>GUIDING PRINCIPLE</p> <p>Achieve compact growth that optimizes infrastructure investment.</p> </div>		
<p>4.1: Establish a compact and contiguous development pattern to accommodate employment and population growth</p>	<p>✓</p>	<p>The Plan has been broken into five Planning Areas of which Planning Areas 1 & 2 under this Plan can proceed with developing a Neighbourhood Area Structure Plan with future Planning Areas requiring an amendment to the ASP prior to proceeding.</p> <p>The policies of the ASP also speak to meeting minimum required densities (policy 5.3.1.1) that will create compact development and the requirement for phasing within each Neighbourhood Area Structure Plan (policy 6.2.1.1ix) along with supporting policy on contiguous development (Plan policy 5.6.1.2).</p>
<p>4.2: Enable growth within built-up urban areas to optimize existing infrastructure and minimize the expansion of the development footprint</p>	<p>✓</p>	<p>This Plan is surround by development to the north (Sturgeon Valley Core ASP), to the south and south west (City of St. Albert and City of Edmonton) and to the east (CFB Edmonton). Within the Plan area existing small clusters of development and existing services extend in the Plan area. This is a long term Plan to provide for future growth within Sturgeon County to reduce pressure on the remaining agricultural areas within the County over the long term.</p>
<p>4.3: Plan and develop greenfield areas in an orderly and phased manner to contribute to complete communities</p>	<p>✓</p>	<p>The Plan focuses on the strategic build out of Planning Areas 1 & 2, with the remaining Planning Areas 3, 4 & 5 recognized as future planning phases that will require amendment to the Plan prior to proceeding.</p>
<p>4.4: Plan for and accommodate rural growth in appropriate locations with sustainable levels of local servicing</p>	<p>n/a</p>	

PRINCIPLES + OBJECTIVES	CONSISTENCY	EVALUATION + COMMENTARY
4.5: Plan and develop mixed use and higher density centres as areas to concentrate growth of both people and jobs	✓	Section 5.4 of the Plan sets out a framework for commercial and mixed-use development to increase density and create employment opportunities that are within close proximity to employees. The main mixed-use site is located centrally within the ASP area, being part of Planning Area 3 and requires a minimum of 42 du/nrha along with the creation of a future bus transit hub.
4.6: Prioritize investment and funding of regional infrastructure to support planned growth	✓	The Plan Objective 5.10.2 sets out the framework <i>"to work with other government agencies on funding support and collaboration relating to major transportation infrastructure that benefits Our Future Valley and other communities."</i>
4.7: Ensure compatible land use patterns to minimize risks to public safety and health	✓	The land uses are predominantly residential with nodes of mixed-use development that do not pose a risk to public safety and health. The Plan is located near CFB Edmonton which has an airport for helicopter operations and policy has been included for the development of NASPs to engage with CFB regarding requirements for development and its interface with aviation regulations, specifically as it relates to the light industrial area (refer to policy 5.5.1.2). The light industrial area is also buffered through significant wetlands that are considered Crown claimable.

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<div data-bbox="207 331 370 499">  </div> <div data-bbox="402 359 852 436"> <p>GUIDING PRINCIPLE</p> <p>Ensure effective regional mobility.</p> </div>		
<p>5.1: Develop a regional transportation system to support the growth of the Region and enhance its regional and global connectivity</p>	✓	<p>The Plan area is recognizes the regional transportation road know as 127 Street. The plans contained within the ASP show the alignment of this regional road and policy is included to protect the corridor through the development process (Plan policy 5.10.1.1)</p>
<p>5.2: Encourage a mode shift to transit, high occupancy vehicles and active transportation modes as viable alternatives to private automobile travel, appropriate to the scale of the community</p>	✓	<p>Section 5.10 of the Plan sets out a comprehensive framework for transportation in the plan area by providing choice in the modes of transportation, including creating active transportation network for non-motorized forms of transportation in order to contribute to the health and wellness of the community (objective 5.10.4).</p>
<p>5.3: Coordinate and integrate land use and transportation facilities and services to support the efficient and safe movement of people, goods and services in both urban and rural areas</p>	✓	<p>Section 5.10 of the Plan describes the critical roles that transportation connections within the Plan play to facilitate the safe and efficient movement of people, goods, and services and how it relates to the proposed land uses.</p>
<p>5.4: Support the Edmonton International Airport as northern Alberta's primary air gateway to the world</p>	n/a	

PRINCIPLES + OBJECTIVES	CONSISTENCY	EVALUATION + COMMENTARY
5.5: Ensure effective coordination and alignment of regional transportation policies and initiatives between all jurisdictions	✓	The Plan states that the County is to work with other government agencies on funding support and collaboration in relation to major transportation infrastructure that benefits the Plan area and other communities (objective 5.10.2). Further, the development of the NASPs need to carry out a traffic impact assessment that considers the potential downstream impacts on adjoining municipalities (refer to policy 5.10.1.4).
PRINCIPLES + OBJECTIVES	CONSISTENCY	EVALUATION + COMMENTARY
 <p>GUIDING PRINCIPLE Ensure the wise management of prime agricultural resources.</p>		
6.1: Identify and conserve an adequate supply of prime agricultural lands to provide a secure local source of food security for future generations	✓	The development of the Plan is to accommodate for future growth for Sturgeon County over the long-term reducing pressure on existing valuable agricultural lands across the County.
6.2: Minimize the fragmentation and conversion of prime agricultural lands to non-agricultural uses	✓	Plan policies 5.6.1.1 and 5.6.1.2 state that existing agriculture within the Plan should remain as agricultural until development is approved by the County. Additionally, when preparing a NASP, development staging shall be carried out in a manner to avoid impacts on agricultural operations. This is to avoid constraining existing agricultural lands until demand requires the lands to be developed.
6.3: Promote diversification and value-added agriculture production and plan infrastructure to support the agricultural sector and regional food system	n/a	

5.0 SUMMARY AND CONCLUSIONS

The following summary provides an overview of how the proposed amendments work towards each Guiding Principle within the Growth Plan:

Sturgeon Valley Study Area Policy	<ul style="list-style-type: none"> ▪ The Plan provides policy that is in alignment with the minimum 35du/nrha. ▪ The ASP has created a transitional gradient. ▪ A bus transit has been established within the ASP. ▪ The ASP policy is consistent with other EMRGP policies as indicated below.
Economic Competitiveness & Employment	<ul style="list-style-type: none"> ▪ The Plan includes the provisions of commercial, mixed use and light industrial activities that will provide employment opportunities to the community and services. ▪ Transportation network is planned to facilitate the movement of people, goods and services.
Natural Living Systems	<ul style="list-style-type: none"> ▪ Desktop Environmental assessment has been completed and identified key environmental features incorporated into the overall concept plan. ▪ Innovative and emerging technologies that integrate more with the natural ecosystem have been included within the policy. ▪ The Sturgeon River is recognized as a key natural feature within the ASP.
Communities & Housing	<ul style="list-style-type: none"> ▪ The Plan provides for a range of housing types, from single-detached homes to mid-rise apartments. ▪ Higher densities are focused along key corridors and mix-use centres.
Integration of Land Use & Infrastructure	<ul style="list-style-type: none"> ▪ The Plan is planned around key road infrastructure with the Planning area 1 being developed to enable the development of 127 Street that will support development throughout the Sturgeon Valley region. ▪ Planning Areas have also been developed around existing servicing infrastructure. ▪ Land uses have been located in a manner to minimize conflict through creating buffers and transitional gradients.
Transportation Systems	<ul style="list-style-type: none"> ▪ High density development will help support the ability to provide future bus transit station and public transportation. ▪ The regional road 127 Street is protected and supported through policy for its development. ▪ Internal and external traffic requirements have been considered and the structure requires future Neighbourhood Area Structure Plans to build on the modelling completed to date to monitor the potential impacts and what infrastructure upgrades will be needed. ▪ The Plan includes policy for the development of Neighbourhood Area Structure Plans to assess the downstream impacts and work with neighbouring municipalities.
Agriculture	<ul style="list-style-type: none"> ▪ Proposed development adds population within an area designated for future development under the Special Study Area policy that alleviates pressure on other areas of the County for accommodating growth.

