



## POLICY REPORT URBAN STRUCTURE

Report Date: March 27, 2009  
Contact: Ronda Howard  
Contact No.: 604.873.7215  
RTS No.: 08007  
VanRIMS No.: 08-2000-20  
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TO: Vancouver City Council

FROM: Director of Planning, in consultation with the Managing Director of Social Development and the General Manager of Engineering Services

SUBJECT: Preliminary City Comments on Draft Regional Plan: *Metro Vancouver 2040*

### ***RECOMMENDATION***

THAT Council forward this report regarding *Draft Metro Vancouver 2040* to the Metro Board in response to Metro's request for preliminary municipal comments for their public consultation materials.

### ***GENERAL MANAGER'S COMMENTS***

The General Manager of Community Services recommends approval of the foregoing.

### ***CITY MANAGER'S COMMENTS***

The City Manager recommends approval of the foregoing.

### ***COUNCIL POLICY***

The *Livable Region Strategic Plan (LRSP)*, the region's current regional plan, was endorsed by Vancouver City Council in 1995.

The *Vancouver Regional Context Statement Official Development Plan*, which demonstrates how the City's plans and policies support the *LRSP*, was adopted by Council in 1999.

## SUMMARY

The Metro Board has directed that a draft regional plan, *Metro Vancouver 2040*, be released for consultation in April, and has given municipalities the opportunity to provide preliminary comments to be included in the consultation materials.

Vancouver has always been a strong supporter of regional planning, recognizing that key issues extend beyond the city, and that it is important for all the municipalities and other levels of government to act in a consistent manner if we are to achieve mutual goals.

The draft *Metro Vancouver 2040* is organized around five goals, several strategies, and a land use framework. These are generally consistent with City Council priorities of affordable housing, inclusive communities, environment and sustainability, and creative and growing economy.

The next level of the draft plan is the detailed actions. These include many specific actions consistent with City priorities and policies. However, it is also at the level of actions where three key issues arise.

The first issue is land use at rapid transit stations in industrial areas. Important objectives of the draft plan are to protect industrial land, and, the flip side, to make sure that the viability of Urban Centres is not undermined by allowing low-density dispersed commercial in industrial areas. To achieve this, the draft plan seeks to prevent significant commercial at rapid transit stations in industrial areas. Vancouver has several such stations. Vancouver policy supports the protection of industrial land supply, but at the same time sees rapid transit stations as an opportunity to provide high density job space close to the station to increase transit ridership, while also protecting most industrial and making sure that the main concentrations of commercial remain in Centres.

The second issue is that the draft plan seeks to transfer decision-making on certain types of land use change from the municipal level to the Metro Board level. For Vancouver, this is particularly of concern for industrial areas, especially given the land use at transit stations issue. Alternate approaches could include Metro playing more of a role to monitor, raise awareness, promote, research, and work with municipalities to create a full regional industrial strategy.

Affordable housing implementation is the third issue. There are two concerns, first related to the lack of regional leadership in developing a Regional Housing Action Plan instead of only evaluating municipal Housing Actions Plans; and, second, related to how affordable housing targets are established.

All of these issues have a common theme. The draft plan seeks to apply consistent and simple rules across the region. But it is difficult for such an approach to apply to the reality of the many different and complex individual contexts. The draft plan seeks to implement this approach by giving Metro staff and the Metro Board the role of evaluating municipal actions and making final decisions on municipal land use change, rather than a Metro role of policy leadership and municipal support and consultation.

This report also identifies issues about the limited April-May public consultation, and the timing of the next steps for plan approval in relation to Vancouver's own timelines.

## **PURPOSE**

This report is in response to a motion approved by the Metro Vancouver Board on February 27, 2009: "To refer the report titled *Draft Metro Vancouver 2040*, dated February 2009, to member municipalities for initial comment on key issues prior to public consultation starting on April 15, 2009."

A letter to Mayors and Councils sent by Metro further explains that this is a request for comments on "significant policies in the draft plan which your Council wishes to express its support for, or opposition to," and specifies a deadline of April 8 for these comments.

## **BACKGROUND**

Metro Vancouver has been working on an update of the current regional plan, the *Livable Region Strategic Plan (LRSP)*, which is over a decade old. They have now arrived at a draft that has been approved by their Board for public consultation: *Metro Vancouver 2040* (dated February 2009). This draft has been sent by the Board to municipal councils, to seek high level comments to be included in the consultation materials. Staff in other municipalities are also currently at work on reports to their respective Councils.

In April, the full consultation will begin, and more detailed comments can be provided by municipalities.

City staff has participated in the development of the draft plan by providing and reviewing data; reviewing and correcting detailed land use maps; and providing policy advice at the Technical Advisory Committee and its Housing Subcommittee. Staff also reported to Council in April 2008 with comments on a Metro options discussion paper. At this point, some City staff suggestions have been incorporated into the current draft, while others remain as key issues discussed in this report.

## **Regional Planning Framework**

The Metro Vancouver (or Greater Vancouver Regional District, GVRD) Board consists of 36 directors representing 21 municipalities, one electoral area (UBC), and one municipality that is a member of the GVRD for the parks function only (Abbotsford). The directors are members of municipal councils who have been appointed to the Board by their respective councils. Regional planning is one of the Metro Vancouver responsibilities. The area extends from Bowen Island on the west, east to Maple Ridge, Pitt Meadows, and Langley.

A regional plan has two overall components intertwined: the plan policies and the methods of implementation. The Provincial Growth Strategies Act governs regional planning and includes the following:

- Approval of a regional plan (regional growth management strategy) requires approval of all the individual municipal councils and 50% plus 1 of the weighted vote at the Board.
- After a regional plan is approved, Regional Context Statements (RCS's) are required from each municipality to show how the local plans and policies are consistent with, and moving toward, the regional plan. The RCS is submitted to Metro staff for evaluation and submitted to the Board for approval, requiring a 50% plus 1 weighted vote. Any future amendments to a RCS also require the same approval process. (Vancouver's RCS is the

*Regional Context Statement Official Development Plan.* This has not required any amendments since it was approved in 1999.)

The regional land use plan relies on a complementary regional transportation plan. The existing *Livable Region Strategic Plan* (1995) was paired with *Transport 2021, Long Range Transportation Plan for Greater Vancouver* (1993), which was developed jointly by the Greater Vancouver Regional District and the Province of British Columbia. *Transport 2040*, the region's current long term transportation plan was completed by TransLink in 2008, with detailed implementation and funding strategies described in annual 10-Year Plans. In 2008, the Province of British Columbia also released a Provincial Transit Plan that includes the Metro Vancouver area.

## **DISCUSSION**

This section provides comments on where the draft regional plan is consistent with City priorities and policies, and where staff has identified issues and risks. In the latter case, alternate approaches are suggested. The section is organized to follow the outline of the draft plan, as follows:

- Goals and strategies - these are generally consistent with City priorities and policies
- Land use elements, and population and employment targets - also consistent with City priorities and policies
- Actions - where key issues have been identified
- Consultation and timing - where additional issues have been identified

## Proposed Goals and Strategies

The draft plan is centred on five goals, each with one or more strategies (Appendix A - Table 1). These goals and strategies are consistent with City Council priorities of affordable housing; strong, safe and inclusive communities; environment and sustainability; and creative capital and growing economy. Specifically, the goals are as follows:

- **Create a compact urban area** (including strategies to contain development within this area; and to encourage land use and transportation that reduce greenhouse gas emissions)
- **Support a sustainable economy** (including concentration of office, retail, institutional, cultural, and entertainment activities in Urban Centres; protection of the industrial land supply; and protection of agricultural land)
- **Protect the region's natural assets** (i.e., protection of land for conservation and recreation)
- **Develop complete and resilient communities** (including diverse and affordable housing choices)
- **Support sustainable transportation choices** (with strategies that emphasize support for transit, walking, and cycling, as well as an efficient goods movement network).

These goals and strategies are also consistent with existing City policies, including CityPlan, Central Area Plan (and its Metro Core update), Industrial Lands Strategy, Vancouver Transportation Plan, and the EcoDensity Charter, and with Council's current priorities.

### Proposed Land Use Elements, and Population and Employment Targets

The proposed land use elements (Appendix A - Table 2) would be the physical structure of the region. They arise from the goals and strategies, and create an overall land use framework for the region's future development. This framework is generally consistent with City priorities, policies, and plans.

The proposed framework would focus growth specifically in Urban Centres and along Frequent Transit Corridors to support transit, walking, and cycling and to foster complete communities with amenities and services. It also identifies Industrial Areas and Agricultural and Conservation/Recreation Areas as areas for protection.

The draft plan also contains population, dwelling unit, and employment projections and specific targets for Urban Centres and the Frequent Transit Corridors. The details of these numbers are still being refined by Metro.

Overall, Vancouver can meet the population targets within current zoning and policies, and there are also opportunities to increase this potential with initiatives such as EcoDensity and transit station planning. (Adoption of a regional plan with targets does not put a cap on Vancouver population growth.)

Vancouver can also meet the employment targets, dependent primarily on changes proposed for the Metro Core where two-thirds of the city's jobs are located.

The projections show that by 2040, Vancouver would be matched by Surrey in population, but Vancouver employment would continue to be much higher. The Vancouver Metro Core would remain by far the largest concentration of population and employment in the region.

### Proposed Actions

The draft plan contains many actions for each strategy. The actions make up the bulk of the draft. They are laid out in three groups: what Metro will do; what municipalities will do; and what is requested of other governments and agencies.

The actions include many specific actions for municipalities that are consistent with City priorities and policies, such as: actions to concentrate retail, office, cultural, institutional, and entertainment in Urban Centres; enhance the place-making qualities of centres; support neighbourhood centres that provide day-to-day goods and services for the local community; create district heating systems where appropriate; support urban food production; make the transportation system safe, accessible, and compatible for enhanced transit, cycling, and walking; and work with TransLink and the Province to develop and implement a regional goods movement strategy, demand management measures, and transportation targets -- as well as requests to senior levels of government, including support for transportation improvements and social and supportive housing.

Some of the actions are also where the key issues lie. This is because the issues are not about what the region should be, but rather about precisely how to get there with 22 different local governments involved, as well as other levels of government.

For Vancouver, there are three key issues related to the actions: Land use at rapid transit stations in industrial areas; decision-making; and affordable housing implementation. Each is discussed below, including background information, an explanation of the issue, and suggested alternative approaches.

#### Issue #1 - Land Use at Rapid Transit Stations in Industrial Areas

**Background:** Protection of industrial land supply is one of the draft plan's 13 strategies. This is a positive direction that connects to Vancouver Council priorities of environment and sustainability, and creative and growing economy. Protection of industrial land is also contained in approved City policies, such as CityPlan, the Industrial Lands Strategy, and Central Area Plan.

Specifically, industrial land is important to sustainability and the economy in the following ways:

- Businesses from a wide variety of economic sectors make their homes in the city's industrial areas. Examples include recreational clothing manufacturing, film and sound production studios, publishing, labs including biotech, digital printing, computer systems design, environmental technology, architectural model building, bakeries, fresh vegetable wholesalers, repair shops, custom fabrication of metal parts, custom wood-working, concrete plants, taxi depots, and recycling depots; as well as the Port, and public services such as the City waste transfer station, City and Park Board works yards, and TransLink bus barns.
- Industrial areas provide unique location features not met by other employment zones: lower cost space; different types of space; and compatible locations for noise, trucking, lighting, odours, etc. Industrial areas on Burrard Inlet, and south of Marine Drive, provide water access for the Port and other businesses.
- Industrial areas provide a location for businesses in proximity to their suppliers, customers, and workers, reducing the need for longer travel distances across the region.
- Jobs in industrial areas provide a cross-section of jobs for city residents.
- Rail tracks and rail yards are located in industrial lands (the Flats, the Powell Street industrial area, and through the Clark Drive industrial area); this provides a more environmentally sustainable form of goods movement than trucks (similar to water transport).
- Keeping industrial areas for industrial businesses is a corollary of concentrating office and retail in Centres to strengthen centres as complete communities easily accessible by transit, walking, and cycling.

In recognizing the value of industrial land, the draft plan also recognizes that industrial lands can be easily lost or de-stabilized through the introduction of 'higher order' uses. These may be attractive in and of themselves, but they reduce industrial activity not only directly, but also indirectly by causing speculation, increased land value, and increased property taxes for existing businesses.

Issue: Looking past the general strategy level to the specific actions, the industrial issue for Vancouver is that the draft plan seeks to prevent any significant commercial at rapid transit stations in industrial areas. The objectives are to protect industrial land, and also, the flip side, to make sure office and retail locate mainly in Centres instead of as low density dispersed sprawl. However, the proposed blanket 'no' to significant commercial uses would not be consistent with current City policy and planning programs, because these objectives can be addressed in different ways depending on the specific context. (Vancouver currently has four stations in industrial areas, Rupert, Renfrew, Marine Drive, VCC-Clark, as well as other stations close to industrial areas.)

Alternate Approaches: Vancouver's approach for industrial land at rapid transit stations has been to consider how best to meet the blend of objectives. Vancouver pursues a strategy where these station locations are individually examined to see if job-dense commercial can be provided at transit-rich locations, while still protecting overall industrial, and not taking away from the main concentration of office and retail in Centres. Vancouver pursues this strategy for a number of reasons including to increase transit ridership (office has the most ridership of any land use) and to ensure that the city has a range of types of employment areas. The regional plan could accommodate this type of strategy and criteria.

## Issue #2 - Decision Making

Background: For plan implementation, Metro can take on additional regulatory powers if the municipalities agree to give it --i.e., to give themselves in their role as members of the Board, and to Metro staff as evaluators reporting to the Board with recommendations.

The current regional plan, the *LRSP*, takes a strong regulatory approach only for the Green Zone. Lands cannot be removed from the Green Zone without Metro staff evaluation and Metro Board approval. However, Green Zone lands were already primarily controlled by the Agricultural Land Reserve or through public ownership as parks, before this regional regulation was put in place.

Issue: The draft Plan now seeks to extend the regulatory approach - i.e., to 'reroute' additional land use decisions from the municipal level to the Metro staff and Board level. Where the concern is most clear for Vancouver is in the case of industrial areas.

It would be a very significant change if the final decision-making authority were Metro, instead of each municipality. Industrial areas have very specific zoning boundaries that are determined through municipal policy development and municipal statutory zoning requirements.

On some level, providing a regional regulatory framework for industrial land is appealing because industrial lands are easily gotten rid of and then impossible to replace, and a consistent preservation approach across the region would be attractive.

However, how this would actually be implemented is not well conceived in the draft plan; and would appear to require numerous small and very time-consuming amendments at both the municipal and Metro levels, for even minor changes.

It is a challenge to enshrine in a regional plan regulatory details that adequately apply to all the individual contexts across the region. As noted above in the discussion of land use at rapid

transit stations in industrial areas, the City's overall industrial direction is consistent with the draft Plan, but how the City implements this is a different approach in some specific circumstances than the rules proposed in the draft plan. The City's approach would be subject to confirmation by the Board for each instance if the regulatory approach of the draft plan is implemented.

Alternate Approaches: Vancouver staff suggests that, for industrial land, instead of the proposed regulatory approach, the following alternative approaches could be taken:

- Protection of industrial areas, as well as concentration of commercial in Centres, could still be enshrined in the regional plan as strategies, along with maps showing Centres and industrial zoned areas to indicate their general location. When municipalities prepare their Regional Context Statements for Metro approval (to show how local policies are consistent with the regional plan), municipalities would have to describe how they are meeting these strategies, but would not need to submit each specific boundary change for Metro approval. (This approach is similar to most of the current *LRSP*.) (Regional Context Statements must be submitted to Metro staff for evaluation and to the Board for approval.)
- Instead of a focus on regulating municipal zoning changes, Metro Vancouver could assign to itself, in the draft regional plan, the role of monitoring industrial land, raising awareness and promoting industrial land viability, researching its supply and demand, identifying best practices, and generally working with municipalities to put in place the elements of a regional industrial land strategy.
- The new regional plan could also establish criteria and thresholds for industrial land protection, triggering municipalities to report their decisions to the board where they exceed these thresholds. This could be a way to highlight change for broader discussion, without giving up final municipal decision-making power.

### Issue #3 - Affordable Housing Implementation

Background: Affordable housing is one of the 13 strategies in the draft plan. This gives affordable housing a higher profile in the new draft plan than in the existing plan. A higher profile for affordable housing is consistent with Vancouver Council priorities. The key proposed implementation action is for municipalities to develop Housing Action Plans. This is a positive direction.

Issue and Alternate Approaches: There are two concerns, first related to the lack of regional leadership in developing and implementing Housing Actions Plans, and, second, related to how affordable housing targets are established.

As currently proposed, the draft plan actions commit Metro Vancouver to "evaluating" Municipal Housing Action Plans, instead of developing a Regional Action Plan on which municipal plans can be based. While Metro Vancouver commits to implementing the Regional Affordable Housing Strategy (RAHS), this strategy is very high level and lacks the analytical basis municipalities need. If Metro Vancouver, through the draft plan, expects municipalities to develop and implement Housing Action Plans, the region should commit to developing a regional Housing Action Plan to provide the analytical basis for municipal plans. The draft plan should also commit Metro Vancouver to providing ongoing support to municipalities in



implementing Housing Action Plans, particularly in the areas of research and analysis. Developing an effective regional affordable housing component is a substantial task that will require a commitment of resources and time. The draft plan actions do not reflect this important commitment.

The second issue is housing targets. Municipal Housing Action Plans would be required to specify strategies to meet affordable housing targets contained in the draft plan. (The targets are currently identified as "estimated housing demand"). However, the development of the regional and municipal housing targets has not been based on sufficient analysis. The targets apply basic regional averages of demand for affordable and rental housing to each municipality without consideration for municipal context. Targets that are adopted without considering context, or the ability of different member municipalities to achieve those targets, are unlikely to be met. If realistic and meaningful targets are to be established, further analysis and consultation with member municipalities is needed. The draft plan provides for transportation mode split targets to be set at a later date through further consultation with municipalities. This model could also be applied to the refinement of housing targets.

These concerns about affordable housing actions mirror the concern discussed earlier in this report about decision-making for industrial land protection. In both cases, the draft plan seeks to have Metro take the role of enforcement and evaluation, instead of a role of policy leadership, support, and consultation

### Proposed Consultation and Timing

There are three issues related to consultation and timing as described below.

#### Issue #1 - Extent of Public Consultation on Draft Plan

Background: The most recent information from Metro Vancouver staff is that consultation, which begins in mid April, is to be completed in May. Events specifically in Vancouver are the following:

- Public meeting: April 22 at Robson Square, 7 pm
- Public breakfast presentation: May 6 at BCIT Downtown Campus, 7:30 am
- Sustainability Dialogue: May 20 at SFU Wosk Centre for Dialogue, 11:30 am - 2 pm

There will also be a full-day 'Summit' event for the region as a whole and information on-line, with an on-line feedback form, and tv shows available on cable and on-line, as well as a media strategy.

Issue: These are limited events and a limited timeline for such a significant plan that addresses the future of the region. It is unlikely that this will be adequate to achieve the broad public awareness and buy-in that could be the underlying strength of a plan which is dependent for its ultimate success on the actions of so many different municipalities over a long period of time.

Alternate Approach: An alternate approach would be a longer, more intensive and broad-based public consultation period extended through at least June (recognizing that July and August are not a good time for public consultation). This would then allow time in late

summer and fall for revisions to the draft. After the Olympics, a final consultation program and the final approval process could take place. (If the plan's final approval could be delayed in any event -- see below under issue #3 -- it would make sense to provide a time period and program for more complete consultation.)

#### Issue #2 - Timing for Council Input on Draft Plan

Background: The timing of input from municipal councils on the draft plan is intended by Metro staff to be during, not after, the public consultation. Metro would expect Vancouver's more detailed comments (as opposed to the preliminary high level comments in this report) to be submitted by the end of May.

Issue: This means Council would be expected to submit its final comments on the draft without the benefit of hearing the input from the public consultation.

Alternate Approach: If the public process were extended until early summer as suggested above, staff would be able to report to Council in mid summer with recommendations on detailed comments after having heard public input. Extending the time period for Council response to Metro would also give Council the time and opportunity to hear any local input directly.

#### Issue #3 - Timing of Council and Board Approval of Final Plan

Background: The current intention by Metro is to use the input received by the end of May to create a revised draft for the Board in June. If the Metro Board is satisfied with the final draft of the plan, they would refer it to public hearing (the current schedule calls for this to occur in late June or in July) and then to all the municipal councils for approval (by November) so that a new regional plan would be approved by the Board in November.

Issue: This could easily put the timing for Vancouver feedback into the Olympics lead-up period, or with a small change in timing, into the actual Olympics time, which may not be a realistic timeline for Vancouver.

Alternate Approach: Adjusting the timeline, as suggested in discussing issues #1 and #2 above, would put the final plan approval after the Olympics. This could well be preferable timing for a significant regional plan.

#### *FINANCIAL IMPLICATIONS*

None

#### *PERSONNEL IMPLICATIONS*

None

#### *ENVIRONMENTAL IMPLICATIONS*

The draft regional plan incorporates environmental objectives.

### *SOCIAL IMPLICATIONS*

The draft regional plan incorporates concepts of “complete communities” and affordable housing in particular.

### *IMPLEMENTATION PLAN*

Implementation of the regional plan is part of the draft regional plan proposals and discussed in the body of this report above.

### *COMMUNICATIONS PLAN*

Metro’s consultation plans are discussed under above.

### *CONCLUSION*

This report provides a preliminary commentary on the draft regional plan, *Metro Vancouver 2040* (February 2009). This commentary is provided in response to the Metro request for municipal comments to include in Metro public consultation materials for the April-May consultation period.

The draft plan’s proposed goals and strategies are very consistent with Vancouver priorities, plans, and policies. However, there are also high level issues related to specific actions regarding land use at rapid transit stations in industrial areas; decision-making roles; and implementation of affordable housing actions.

It is a challenge to enshrine in a regional plan regulatory details that adequately apply to all the individual contexts across the region. The underlying issue has to do with the role of Metro and the role of municipalities in achieving the plan. The preliminary comments in this report suggest that it could be more workable if Metro’s role were less to enforce and evaluate, and more to provide support, research, and monitoring. Specific examples and suggestions are included in this report. The report also identifies issues related to the public consultation process and the timing of consultation and plan approval, and a more responsive timeline has been suggested.

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## Appendix A: Draft Plan - Goals and Strategies and Land Use Framework

This appendix contains information from the draft regional plan, *Metro Vancouver 2040*, dated February 2009. Table 1 is the proposed goals and strategies. Table 2 is the proposed land use elements.

**Table 1: Draft Plan - Goals and Strategies**

Proposed Goals	Proposed Strategies
1. Create a compact urban area	1.1. Contain urban development within the Urban Containment Boundary
	1.2. Focus growth in Urban Centres and in Frequent Transit Development Corridors
	1.3 Encourage land use and transportation development that reduces greenhouse gas emissions
	1.4 Protect the region's rural lands from urban development
2. Support a sustainable economy	2.1. Promote patterns of land development that support a diverse regional economy and employment close to where people live
	2.2 Protect the region's supply of industrial land
	2.3 Protect the region's supply of agricultural land and encourage its use for food production.
3. Protect the region's natural assets	3.1 Protect the region's conservation and recreation lands
4. Develop complete and resilient communities	4.1 Provide diverse and affordable housing choices
	4.2 Develop complete, inclusive communities with access to a range of services and amenities
	4.3 Minimize risks from natural hazards and adapt to the impacts of climate change
5. Support sustainable transportation choices	5.1 Connect land use and transportation to support transit, walking and cycling
	5.2 Connect land use and transportation to support an efficient regional roads and goods movement network

Inherent in these goals and strategies is a land use framework which is described in Table 2 on the next page.

Table 2: Draft Plan - Land Use Elements

Proposed Land Use Elements	Summary Description
Agricultural Area and Conservation/Recreation Area	Added together, these areas were formerly known as the Green Zone. Most of the lands are Agricultural Land Reserve or publicly-owned lands like parks
Rural Area	This reflects municipal plans for areas with very low density residential
Urban Containment Boundary	This is all the remaining area - i.e., the area not in the Agriculture Area, Conservation/ Recreation Area, or Rural Area. The Urban Containment Boundary is the region's urban growth area
More specifically, the Urban Containment Boundary would have the following elements	
Urban Centres	These are at various levels, from Vancouver's Metropolitan Core of the Region, to Regional Centres, and Municipal Centres. Centres are intended to serve as focal points for the growth of housing and businesses and as transit hubs
Frequent Transit Development Corridors	These are proposed as a focus for housing growth and would also have local commercial, but not significant office concentrations - the latter are intended for Urban Centres only
Special Activity Centres	These recognize significant economic/job growth locations that are not Urban Centres, such as the Airport, Port, universities, health precincts.
Industrial Areas	These are existing industrial areas, intended to be protected for industrial types of activity and some limited ancillary commercial
Industrial/Commercial Areas	These areas are recognized as industrial lands already determined by municipalities as acceptable for stand-alone office and retail. Because the draft Plan focus is on concentrating major office and retail in Urban Centres, additional Industrial/Commercial areas are not encouraged