Appendix "A"
Winnipeg Metropolitan Region Plan 20-50 - City of Winnipeg Public Service comments

April 30, 2021

Policy no.	Topic	Policy	Pg	Comment	Level of interest
n/a	Schedule 1 - Regional Structure (map)	See map	50	The Metropolitan Core aligns with the existing Complete Communities, but not the Urban Structure of the proposed Complete Communities 2.0: - Mapping inconsistencies: identified Corridors are not consistent, the Unicity area is a RMU Centre in CCDS 2.0. - Policy inconsistencies: Policy nuance has been added to CCDS 2.0 with regards to the alignment of highest densities with transit. A Transformative Area designation no longer implies equal priority for intensification (rather it recognizes opportunities to accommodate larger amounts of growth at varying levels of density). Metropolitan Core policies should be refined to better align with the City's new policy direction. Clarity is required to understand how future City amendments to its Urban Structure will be subsequently addressed in Plan 20-50. Will an amendment to Plan 20-50 be required to add Centres, Corridors, Major Redevelopment Sites, etc.? Adjust boundaries? It is recommended that Centres, Corridors, and Major Redevelopments Sites are not mapped in Plan 20-50, only described. By including them, Plan 20-50 duplicates the role of Complete Communities, which will make future amendments much more cumbersome to process. Other cartographical comments: - The use of symbols/shapes to identify Centres, Major Redevelopment Sites, etc. makes it challenging to understand the sites over which density targets would be measured. - There appears to be two Major Redevelopment Sites identified in Parker Lands when there should be only one. - Scale is too large to properly identify the specific locations of Centres, Major Redevelopment Sites, Corridors vs RT Corridors, etc. Consider using labels (e.g. A, B, C, etc.) and then identifying them in text outside of the map, and consider using different colours. It should also be noted that their location shall be considered approximate. - Consider removing urban reserves from the map, or at least do not use text to identify them. Not only will they be added faster than this map may be updated, but the text is too large to indicate their location. If urban reserves are included, use points.	High
n/a	Policy tier descriptions	n/a	51	Further to the plan being better aligned with the existing Complete Communities rather than CCDS 2.0, the plan reads, "The Metropolitan Core is planned and developed to the highest density within the region". The Metropolitan Core, as defined by Downtown, RMU Centres, RMU Corridors, and Major Redevelopment Sites, are not equal in priority as per CCDS 2.0. Rather, CCDS 2.0 directs the highest densities to the areas with the best transit (Goal 3, General Growth). Transit levels vary within the aforementioned Transformative Areas. Given a need to better align with CCDS 2.0, the Metropolitan Core should align with the intensification target area in CCDS 2.0, then subordinate policies that would direct the highest densities to the best transit. The City of Winnipeg is happy to help clarify this in plan policy.	High
n/a	Description of Metropolitan Core	Represents Transformative Areas defined to land use from OurWinnipeg Complete Communities including Downtown Winnipeg, Major Redevelopment Sites, Regional Mixed Use Centres and Corridors, and Rapid Transit Corridors. - Highest urban density; - Complete communities with contiguous, mixed-use development and density as defined; - Concentrated employment node (Downtown Winnipeg and identified Major Redevelopment Sites); - Rapid Transit Corridors planned with multi-modal function to support transit oriented development; - Interconnected transit with rapid transit network, with connections to the Inner Metropolitan Area; - Multi-modal transportation network including Regional Roads and active transportation trails with connections to the Inner Metropolitan Area; - Regional levels of service as defined; - Concentration of arts, entertainment, cultural, leisure, and sports amenities; - Concentration of institutional clusters.	53	Description of Metropolitan Core should be adjusted to better reflect CCDS 2.0 policies. As noted, we recommend that it be defined by the intensification target area, with policies directing the highest levels of density to the best transit in accordance with policies contained under Goal 3 of the General Growth section. Centres, Corridors, and Major Redevelopment Sites would not be mapped. We would be happy to help in this regard. Metro Core is described as consisting of the Transformative Areas in Complete Communities - of note is that New Communities are also a Transformative Area. Major Redevelopment Sites are generally not the concentrated employment notes as described. Some are to low-to-medium extents, but most are not. Downtown aside, the most concentrated employment nodes are not Transformative Areas (e.g. Employment lands such as that focused around Rt 90/airport, hospitals, universities, etc.). These employment nodes would be much better captured by defining the Metro Core as the intensification target area.	High
Schedule 3	Density minimums and targets, general	See chart	67	First, it is acknowledged that changes have been made from earlier material shared with the City, resulting in the application of these density requirements to fewer sites. This change is positive. It is unclear how infill minimums and targets would be applied in infill areas. The City is concerned with both of the two foreseeable options. If they are applied on a building-by-building basis within, for example, a Centre, this would preclude substandard development that would otherwise be appropriate, such as a commercial pad site at a shopping centre. It is not realistic to expect achievement in all cases; market conditions, physical site constraints, and/or different visions for development will preclude this. Achievement of the minimum/target would also depend on the proposed subdivision. For example, the same hypothetical development in a Centre could have very different densities depending on whether it creates its own lot or is added to the existing shopping centre lot. If density minimums and targets are applied over the wider Downtown, Centre, or MRS and measured in 2050, the targets are significantly misaligned with forecasted market conditions. The WMR forecasts 88,000 (baseline) and 120,000 (high growth) units over 30 years across the entire region, with 26,000 and 35,000 of these units being apartments (growth that occurs in these infill areas will consist almost entirely of apartments). Achievement of all the City's density minimums require at least 60,000 apartment units, while its targets require at least 198,000 apartment units (this excludes units assigned to RMU Corridors, given a lack of clarity over how they would be applied). As a result, this would set the City up for inevitable failure, which is of potential significant consequence given that the plan gives preferential treatment to municipalities that achieve these targets for servicing and infrastructure investment (6.3.2). It is worth asking whether these requirements are of regional importance. The City's Public Service would agree that intensifying Downtown is of regional importance; therefore, it would agree that density requirements Downtown are appropriate. Likewise, so is broad intensification throughout Winnipeg. However, the prescription of specific minimum densities for individual Centres, Corridors, and Major Redevelopment Sites is an overly crude tool that is best applied by the City through local area planning that can reflect the surrounding context and better account for forecasted market conditions. The City is amenable to density requirements implemented for Downtown. While it is amenable to recommended levels of density for Centres, Corridors, and Major Redevelopment Sites, they should not be made requirements.	High
Schedule 3	Density minimums and targets, Downtown	Downtown Winnipeg: minimum residential and mixed use density of 50.2 units per acre, target density of 149.7 units per acre.	67	Assuming it is applied over 30 years, the Downtown minimum is very close to the goal in CCDS 2.0, but the target, translating to 59,000 units, is not realistic given forecasted market conditions. The City is amenable to the density minimum, but a density target should be recalibrated to be made more realistic.	High
Schedule 3	Density minimums and targets, Major Redevelopment Sites	City of Winnipeg Major Redevelopment Sites and centres along rapid transit lines: minimum residential and mixed use density of 40.1 units per acre, target density of 100 units per acre.	67	Clarity is required as to how density minimums and targets would be applied over an entire site. For example, Sugar Beets MRS is quite large. TOD densities would be appropriate within a reasonable walking distance of the transit station, but beyond, planned lower density commercial and employment uses would not be inappropriate. Similarly, from what distance from Portage Ave would Centre density requirements cease to apply? Notwithstanding the City's position on density requirements in Centres, Corridors, and Major Redevelopment Sites, they should only be applicable within a reasonable proximity to the transit station.	High
1.2.6	Extension of water and/or wastewater services	To encourage complete communities, municipalities shall not be permitted to extend water or wastewater services unless: a) The need for the extension has been demonstrated; b) The municipality has completed the applicable environmental assessment process in accordance with the Manitoba Water Rights Act and the Environment Act; and c) Where the province has declared a public health and safety issue.	73	This has potentially significant implications. Clarity is needed to understand its implementation and administration. What is considered an extension of water/wastewater services - new local pipes? Extension of regional pipes? Expansions to treatment plants? What are the implications of this on the development approvals process - will it be applied to new precinct plans? Subdivisions? Who determines need - based on what criteria?	High
2.4.2	Regional road access	To protect Regional Roads for priority access, municipal development plans shall limit direct access to Regional Roads and support grade separation intersections or other appropriate intersection upgrades and public transit connections where appliable.	85	The entireties of Pembina Hwy, Main St, and Portage Ave are designated as Regional Roads. A significant portion of fronting properties rely on direct access. Limiting direct access is not practical in urban areas. If the intent of this policy is maintained, their designation should not begin until outside of urban areas. These streets are also designated as Corridors in Complete Communities 2.0; limiting access and supporting grade-separated intersections would generally run counter to its vision for these streets. Why aren't other regional roads included, such as Lagimodiere Blvd, Bishop Grandin, Route 90, etc.?	High

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6.3.2	Implications of failing to meet density requirements	Minimum density requirements have been established through the regional plan to support optimal servicing and to maximize investments in infrastructure. These minimum requirements apply to all developments approved under this plan. Development plans, sub-area or lower level plans (secondary plan, area structure plan), and zoning by-laws must apply and establish how minimum density will be met. This may include a variety of built forms as determined through local planning processes. Minimum densities are a requirement in consideration of infrastructure investment decisions. Municipalities that meet and exceed minimum density requirements shall be given higher consideration as servicing and infrastructure investments are prioritized.	108	As previously stated, if the infill density requirements are applied over 30 years across entire sites, it is unrealistic to expect the City to achieve the density requirements given its misalignment with forecasted market conditions. Tying infrastructure funding to the achievement of these unrealistic targets is a notable threat to the Provincial funding of City infrastructure. It should also be noted that the City is at considerably more risk given that it will have so many more requirements to meet than other municipalities.	High
n/a	Population forecasts	See charts	22	It should be noted that both the WMR's baseline and high growth scenarios forecast lower rates of growth than the City's most recent population forecast, with the main difference being that the WMR anticipates lower rates of immigration to offset a declining net natural growth trend. To this end, the WMR's baseline scenario forecasts population decline in the City of Winnipeg in the 2040s.	Medium/high
n/a	Structure components, Major Redevelopment Sites	"Major Redevelopment Sites: Sites located within or adjacent to existing communities within the city of Winnipeg with potential to support higher density, mixed-use development, and optimize existing and planned infrastructure capacity to maximize investment."	52	Further to the plan being better aligned with the existing Complete Communities rather than CCDS 2.0, regarding its definition of MRSs, it should be noted that the extent to which they are ideal for higher density, mixed use intensification varies depending on their proximity to high-order transit, including rapid transit. Not all MRSs are equal in this regard.	Medium/high
n/a	Structure components, Regional Mixed Use Corridors	"Regional Mixed Use Corridors: Designated major regional arterial roads in the city of Winnipeg intended to serve as a link between Downtown Winnipeg and one or more Regional Mixed Use Centre or major activity area."	52	Further to the plan being better aligned with the existing Complete Communities rather than CCDS 2.0, the plan's designated Corridors reflect those of the existing Complete Communities. CCDS 2.0 includes additional Corridors, and while it distinguishes between Regional and Urban Corridors, this distinction is based on urban form and design, not intensification priority. McPhillips is now a Regional Mixed Use Corridor. The plan's definition should be more closely aligned with that found in CCDS 2.0: "Corridors are segments of major roadways that, due to their excellent transit service via the Primary Transit Network as well as robust commercial opportunities, provide the best opportunity for mixed use intensification outside of the Downtown. They provide a wide range of transportation options and are vibrant destinations for people to live, work, and play."	Medium/high
n/a	Structure components, Regional Mixed Use Centres	"Regional Mixed Use Centres: Intensely developed, regional attractions located in the city of Winnipeg. They are well-served by public transit and can contain mixed-use development, including residential and specialized employment, commercial, or cultural services."	52	Further to the plan being better aligned with the existing Complete Communities rather than CCDS 2.0, the plan suggests Regional Mixed Use Centres as being equal in priority. However, CCDS 2.0 policies directing varying levels of intensification do not relate equally to all Centres, and are instead driven by proximity to a designated Corridor and transit quality. Unicity is now a RMU Centre in CCDS 2.0. Centres are now mapped to property lines in CCDS 2.0. If Centres continue to be mapped in this plan, which we don't think they should be, this should be updated to better communicate how density targets would be applied.	Medium/high
1.2.2	Regional investment prioritization	To support investment, infrastructure planning shall be coordinated to implement this plan. This shall be done by developing a Regional Servicing Strategy to address: a) An agreed to terms of reference; b) Safe, cost-efficient, and reliable services to meet current and long-term community needs; c) Facilitation of intensification and higher density development; d) A Regional Infrastructure Investment Prioritization Framework; and e) A Regional Slude Management Master Plan to manage wastewater sludge disposal effectively and efficiently.	71	Clarity is needed to understand how the Regional Infrastructure Investment Priotization Framework will interact with the City's administrative and political priorities. How dynamic will it be? Will it only pertain to Provincial funding? Who will be involved in creating this? Who will be involved in creating a Regional Sludge Management Master Plan?	Medium-high
2.4.4	Development in vicinity to the airport	To ensure land use compatibility, the Winnipeg James Armstrong Richardson International Airport and other airport lands in the region shall: a) Be protected from land use and development that may adversely impact their operations and potential for future expansion, as per Transport Canada regulations; b) Include commercial and industrial lands in adjacent areas as supported through municipal development plans; and c) Be considered in municipal servicing and transportation infrastructure plans to ensure future airport expansion requirements are considered in municipal development plans. NOTE: The Winnipeg International Airport Noise Exposure Forecast Study and Planning Analysis undertaken by the Province shall inform the update of this policy.	85	This policy should include protection of the airport's 24-hour operation.	Medium-high
2.5	Shared revenue agreements	To support mutually beneficial efficiencies and innovation, the WMR shall investigate and establish a framework mechanism to share benefits regionally for: a) Regional Employment Areas; b) Regional Infrastructure; and c) Regional Assets.	86	Clarity is required on how this would be implemented, and in what situations. Does the WMR/Province encourage revenue sharing agreements between municipalities, and are there any models they would promote? How will the City be engaged in developing a framework for shared benefit? Benefit sharing must not interfere with cost recovery for ratepayer-based investments.	Medium-high
5.1.2	Permit processing standards	To support a regional approach to planning and development approvals, consistency and clarity in municipal permitting processes shall be led by the WMR working collaboratively with local municipalities to establish a framework for: a) Regional minimum standard permitting processes; b) Common regional templates for municipalities; and c) Common regional processes to measure, monitor, and report on service performance.	102	Clarity is needed to better understand the intent of this policy. Given that regulations that come out of Bill 37 will spell out service standard time frames, how does this fit into ongoing Bill 37 discusions with the Province? What is meant by common regional "templates"? Winnipeg should be exempt from common templates, given potential high levels of complexity.	Medium-high
5.4.2	Service sharing agreements	To support service sharing, the WMR shall establish a Service Sharing Framework to simplify and expedite agreements. The WMR shall: a) Coordinate with municipalities on the framework, including the establishment of common templates for service sharing between municipalities; b) Collaborate and engage in ongoing dialogue with Indigenous Nations to examine appropriate regional governance models to advance reconciliation and facilitate service sharing; and c) Work with Indigenous Nations to facilitate the compatibility of the regional Growth and Servicing Plan and Indigenous Nation's planning and development initiatives.	104	Clarity is needed to better understand the intent of common templates. The City wants to ensure that this will not inhibit its ability to negotiate and promote its interests. How wil existing City regulatory requirements be reflected in a common template? There are existing limitations to the sharing of City water.	Medium-high
n/a	Description of Inner Metropolitan Area	Represents Stable and Transformative Communities: - Stable Communities represent areas that will accommodate moderate growth and change; - Transformative Communities represent the best opportunities for growth and change; - Increasing urban density; - Complete communities with contiguous, mixed-use development and density as defined; - Regional Employment Areas and local employment areas; - Interconnected transit with rapid transit network, with connections to the Metropolitan Core; - Multi-modal transportation network including Regional Roads and active transportation trails with connections to the Metropolitan Core; - Regional levels of service as deined; - Arts, entertainment, cultural, leisure, and sports amenities; - Institutional clusters.	55	Comments regarding the distinction between Stable and Transformative Communities: - We think that it is appropriate that this distinction is not mapped. - Unclear what this distinction is. If it's existing developed areas vs future greenfields, which is what the first bullets on pg. 55 suggest, existing areas in RMs should be included as Stable, as they are probably not the "best opportunities for growth and change". - As currently constituted, Stable Communities would also include Recent Communities. - The terms "stable" and "transformative" are slightly different and are being used in slightly different ways than how they are used in Complete Communities, which may be confusing to readers of both plans. By describing these greenfield opportunities as the "best opportunities for growth and change", that might suggest that they are the best places for the highest densities. It should be clarified that these are areas with the ability to accommodate large amounts of growth at lesser (albeit increasing) densities.	Medium
1.1.1	Growth forecasts	To accommodate the regional projections in Schedule 2, employment and population growth shall be planned in a contiguous pattern in accordance with the Winnipeg Metropolitan Regional Structure to 2050 depicted in Schedule 1.	65	It should be understood that this should not preclude the ability of the City to undertake its own forecasts for its own planning purposes. The City thinks that this forecast is quite conservative and additional scenarios are likely worth considering. Little-to-no employment growth is being attributed to Rosser. Given CentrePort, it is assumed that this is an error.	Medium

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1.1.3	Promoting compact development and servicing limitations	To promote orderly compact and contiguous development supporting low carbon objectives and climate-resiliency, the majority of growth and development shall: a) Be connected by expansion only to existing municipal water and wastewater servicing; b) Be focused to areas with sufficient capacity in existing centres; c) Support connectivity between existing built-up areas; d) Support density requirements as per Schedule 3; e) Protect REgional Road access as per the policies of this plan; and f) Support transit viability and active transportation trails, with a focus on Regional Active Transportation Trails as per Schedule.	66	There may be conflict between b) and d); density requirements cannot be accommodated without sufficient servicing capacity. Further to this end, references to accommodating growth made throughout the document are entirely dependent on available servicing capacity. Investments will need to be made to achieve the plan's vision, recognizing that some City infrastructure such as wastewater treatment is needed to service areas beyond the City boundary. Conversely, the City cannot share water beyond its border.	Medium
1.1.4	Prioritization of infill	To optimize existing infrastructure and minimize the expansion of the built-up area, infill development shall be prioritized. a) Infill shall be adjacent to existing development and shall be designed to minimize the spatial use of land. b) Infill shall be focused to the Metropolitan Core, Inner Metropolitan Area, Urban Centres, Rural Centres, and Settlements; c) Infill development shall be connected to municipal water and wastewater servicing and include existing un-serviced development in a phased approach where available; d) Infrastructure investment to support intensification and housing diversification shall be identified and planned appropriately; e) Where infill or redevelopment of brownfields, vacant, and underutilized land is at a scale that it would be considered as greenfield area development, it shall meet density minimums as per Schedule 3 and include a mix of uses.	66	The prioritization of infill generally aligns with CCDS 2.0, but it begs additonal questions: - In what way is infill prioritized? Facing what specific decisions does this prioritization come into play? For example, CCDS 2.0 prioritizes the use of enabling tools in infill areas (6.1 of General Growth). - How is "infill development" defined in this context? - Will this prioritization of infill development have any implications on greenfield development in the City of Winnipeg? Regarding (e), it is unclear what is meant by "scale". Does this refer to site land area? Be explicit to clarify future interpretation, and state the size this would be in the policy. Regarding densities under (e), where located along a Corridor or Rapid Transit line, would the WMR not want to apply higher TOD densities, rather than greenfield densities (notwithstanding the City's concerns about density requirements)?	Medium
Schedule 3	Density minimums and targets, Regional Mixed Use Centres and Corridors	City of Winnipeg Regional Mixed Use Centres and centres along Regional Mixed Use Corridors: minimum residential and mixed-use density of 34.8 units per acre, target density of 100 units per acre.	67	Clarity is required to understand what is meant by a (lower case "c") centre. Since it is not defined in the plan, the City cannot gauge the implications of this policy. Please confirm that these density requirements would only apply to Regional Mixed Use Centres with frontage along designated Regional Mixed Use Corridors and provide this clarity in policy. Assuming this is the case, this would be positive and in better alignment with CCDS 2.0, notwithstanding the City's concerns about infill density requirements.	Medium
Schedule 3	Density minimums and targets, notes	- Density minimums and targets for Inner Metropolitan Area Stable Communities will be considered through the City of Winnipeg's infill strategy. - Units may include both residential and non-residential units. See Implementation 6.0	67	The City's proposed Infill Strategy does not include density minimums. The City would suggest generalizing this and providing this as its own policy, not as a note to the Schedule 3 table: "Density minimums and targets for Stable Communities in the Inner Metropolitan Area may be considered in local policy, where appropriate." Notwithstanding its concerns about the proposed infill density requirements, provision to include non-residential development is positive and supported by the City, particularly in Regional Mixed Use Centres where the vast majority of existing and likely future development will be non-residential. However, additional clarity is needed to understand how they would be administered before the City can comment specifically on their use.	Medium
1.1.6	TOD and density requirements	To support transit-oriented development, centres along rapid transit lines shall be identified and planned to the density requirement as per Schedule 3, and include a greater diversity of uses, and a pedestrian-oriented urban design.	67	Clarity is required to understand what is meant by a (lower case "c") centre? Since it is not defined in the plan, the City cannot gauge the implications of this policy. This policy speaks to a number of different issues - density, land use, and design. Consider breaking these concepts up into separate policies.	Medium
1.1.7	Greenfield development	To support the development of complete communities, new communities and greenfield areas shall be planned and developed in a contiguous pattern on a full range of municipal services, aligned with existing and planned regional infrastructure, and: a) Achieve minimum densities as identified in Schedule 3; b) Provide a mix of land uses in a compact form including a mix of residential and employment uses; c) Incorporate a phased approach for larger developments, where appropriate; d) Have long term municipal water, wastewater, and drainage servicing capacity to accommodate the planned development; e) Incorporate an interconnected street network that incorporates and provides for Regional Road hierarchy as per policies in this plan; f) Incorporate interconnected active transportation trails; g) Incorporate transit and protects for future transit viability, where appropriate; h) Incorporate innovative and sustainable development standards for compact and efficient development; i) Provide for a mix of housing forms and options that are in areas close to existing and planned employment areas; and j) Have completed an agricultural impact assessment to identify the potential adverse impacts of the proposed development on agricultural lands and existing agricultural operations, in accordance with the policies of this plan.	68	Clarity is needed to understand how the requirement for a mix of land uses would be enforced. How much non-residential uses would have to be accommodated to satisfy a minimum? This policy would be more appropriate as a "should", rather than a "shall", as site size and proximity to existing commercial amenities may limit market opportunities. Regarding (j), would the need for an agricultural impact assessment be determined by the municipality? What does this assessment entail? Who is the arbiter of the results? What happens if the assessment concludes that the lands are highly valuable for agricultural purposes? Would this only apply to requests for new designations? This would be better done proactively for all potential greenfield sites, with designations removed up front if this is the desired intent.	Medium
1.2.4	Drinking water and wastewater plans	To ensure infrastructure is planned, designed, constructed, or expanded in an efficient manner, municipalities shall prepare drinking water and wastewater plans. Plans shall: a) Include detailed capacity and treatment assessments that identify upgrades required to meet demand, environmental protection, and regulatory requirements; b) Prioritize and support opportunities for optimization and improved efficiency within existing systems with strategies for energy and water conservation and water demand management; c) Ensure the system shall serve growth in a manner that supports the minimum intensification and density identified in Schedule 3; d) Identify the full lifecycle costs of the system and develop options to pay for these costs over the long-term; e) Implement controls for hauled wastewater to facilitate monitoring and recording of hauled wastewater effluent and support the assessment of wastewater infrastructure performance; f) Ensure, in teh case of large subsurface sewage disposal systems, the proponent has demonstrated attenuation capacity; g) Coordinate planning for drinking water and wastewater systems, if municipalities share a water source or receiving water body, based on watershed planning to ensure that the quality and quantity of water is protected, improved, or restored; and h) Have been considered in the context of applicable inter-provincial, national, bi-national, or state-provincial agreements or provincial legislation or strategies.	72	Re: b), potable water provision is not the only aspect of water servicing. Systems need to provide for fire protection as well.	Medium
1.2.8	Access to regional roads	To support connectivity, a strong economy and low carbon objectives, a regional transportation network shall address multi-mode access. A common regional road hierarchy shall be established with: a) Land use control in the vicinity of Regional Roads; b) Access control requirements to limit direct access to Regional Roads as per Schedule 4, improve safety, and maintain the integrity of the regional transportation network in accordance with provincial regulation and design standards; and c) Common municipal road standards, with integrated active transportation master plan routing.	73	Who will enforce access control requirements, and how? Who will administer land use control in the vicinity of regional roads, and how (and what does vicinity mean)?	Medium
1.2.9	Regional transit	To coordinate the investment in regional transit priorities, integrated regional transit corridor planning and development shall be undertaken by the WMR and its municipalities in collaboration with other stakeholders to: a) Develop a regional transit governance and cost-sharing model for the provision of regional public transit services; b) Identify lands and corridors for a regional transit system, with a focus on the Inner Metropolitan Area; c) Ensure the regional public transit corridors provide connections to Regional Employment Areas; d) Support modal shift and alignment with active transportation trails, with a focus on Regional Active Transportation Trails as per Schedule 4; e) Support the co-locaiton of infrastructure in these corridors, where appropriate; f) Define and prioritize the need for and the future form, function, and final alignment of public transit corridors.	73	The City's Public Service would be strongly supportive of regional transit, as such a service would help reduce VKT on Winnipeg's road network, helping delay or eliminate road expansions. The City's Public Service would welcome the opportunity to contribute as part of a multidisciplinary team on the planning, lobbying, and construction of infrastructure, as well as the operation of regional transit service. How will the acquisition and development of transit corridors be funded?	Medium

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1.2.11	Regional transportation planning	To support the efficient movement of people and goods across the region, municipalities shall participate in regional transportation master planning. This shall include at minimum: a) Identifying where possible to implement regional transportation options for moving people that connect the Inner Metropolitan Area while planning land uses to effectively integrate transportation modes and support complete street networks; b) Ensuring transportation infrastructure planning is aligned with land use planning to best serve and arrange origins and destinations for the movement of people and goods; c) Developing and strengthening a regional network of active transportation trails, with a focus on Regional Active Transportation Trails identified in Schedule 3, to ensure safe crossing between municipal boundaries and enhance connectivity; d) Supporting the establishment of regional park and ride facilities with multi-modal access in strategic locations of benefit to enhance and expand transportation options between rural and urban areas. e) Consideration of future technology and the potential for pilot projects; and f) Encouraging member municipalities to complete a transportation master plan that is coordinated with adjacent municipalities and the regional transportation master plan.	74	The City's Public Service is supportive of regional transportation planning, but how will it be carried out? Who will take the lead (Manitoba Infrastructure, WMR, newly created agency)? The City's Public Service is supportive of regional active transportation planning, especially at City/region interfaces, such as for crossing roads such as the Perimeter Hwy and alongside highways outside of Winnipeg to permit safe long-distance commuting. The City's Public Service would want to be closely involved as a stakeholder in an active transportation master plan.	Medium
2.2.4	Conversion of employment lands	The conversion of employment uses to non-employment uses, with the exception of Downtown Winnipeg, shall be evaluated as part of a comprehensive review through a municipal development plan update or amendment. Conversion will only be considered if the review demonstrated that: a) There is a need for the conversion to support employment and population growth; b) The lands are not required over the life of this plan for employment purposes; c) The municipality will maintain sufficient employment lands to accommodate projected employment growth over the life of this plan; d) The conversion and proposed uses will not adversely impact the overall viability of Regional Employment Areas; e) There is existing or planned infrastructure to accommodate the proposed land use; and f) Cross-jurisdictional issues have been considered.	83	Clarity is needed to better understand when a conversion could be entertained. "Municipal development plan update" suggests conversions can only be entertained when OurWinnipeg/Complete Communities would be reviewed, but then "amendment" suggests conversions could be considered at any point. Please clarify the intent. Would these criteria only apply to the employment lands prescribed in this plan, or would it apply to the conversion of other employment lands in the City as designated in Complete Communities? Can the City maintain its own criteria through Complete Communities 2.0 provided there is nothing that would undermine these criteria? Are residential uses prohibited in employment lands? Would an amendment be required to introduce residential uses?	Medium
2.4.3	Development in vicinity to rail	To protect for the movement of goods and economic development, land use planning and development shall be coordinated to recognize the existing rail network and enhance its integration with existing and future Regional Roads, Regional Employment Areas, employment areas, and other industrial land uses, including: a) Minimizing new at-grade rail crossings; b) Ensuring land use compatibility by encouraging municipalities to adopt Federation Canadian Municipalities (FCM) guidelines for land use in the vicinity of rail lines; and c) Fostering collaboration in pursuit of rail rationalization and repurposing within the region.	85	The City is developing its own guidelines based on FCM but better adapted to an urban context. The City's Public Service expects that there should be no issues with this. In the City, the location of rapid transit in proximity to rail corridors means residential development is being built in proximity, creating need for rail crossings. While the importance of rail operations is appreciated, potentially conflicting interests should be recognized.	Medium
4.1.3	Subdivision of agricultural land	To limit agricultural land fragmentation and facilitate agricultural uses, subdivision of land designated for agricultural uses shall be restricted as per provincial regulation. Where subdivision is permitted by the approving authority, new residential development on residual parcels shall be restricted.	97	Clarity is required on this policy's implementation. How would a restriction on the subdivision of agricultural land be applied to CCDS 2.0's sectors, which are designated Rural Agricultural but intended for urban development in the long term? Again as per Schedule 6, would this not apply?	Medium
4.1.4	Agricultural impact assessment	To support the identification and assessment of potential impacts on agriculture, the WMR shall lead the preparation of an agricultural impact assessment tool, in collaboration with municipalities and other agencies. The agricultural impact assessment tool shall be prepared by a qualified expert and be utilized to: a) Identify and describe types of development and contextual factors that may impact agricultural land and active agricultural operations; b) Identify potential impacts on agricultural land and active agricultural operations in the surrounding area of such development; and c) Recommend measures to avoid, minimze, or mitigate impacts to agricultural land and active agricultural operations.	97	What would be the parametres of this assessment? How will this tool be applied? Who evaluates the results (and based on what parametres), and how would it influence decision-making? Will this be a requirement of greenfield development in the City of Winnipeg?	Medium
5.2.1	Regional Asset Management Program	To support infrastructure investment and efficiencies, the WMR shall establish a Regional Asset Management Program which shall: a) Include a Regional Asset Management Framework for assessing infrastructure risk and hazard vulnerabilities for regional assets; and b) Identify and prioritize regional actions and investment.	102	Clarity is needed to better understand the intent of this program. Who will participate in creating this program, and how might it interact with Winnipeg's asset management program? The City wants to ensure that this will not inhibit its own asset management program.	Medium
6.6.1	Servicing capacity expansion	The policies of this plan provide for the completion of infrastructure master plans to support growth and servicing. Municipalities should anticipate and plan for needed sewage and water treatment capacity to accommdoate municipal growth and development objectives through the adoption of conservation measures to extend existing capacity and/or the expansion of capacity.	109	The timing of treatment plant upgrades is dependent on significant funding. It should be recognized that conservation measures must be feasible. Such conservation measures will not address significant capacity issues.	Medium
6.6.2	Employment density targets	The calculation of perons/jobs per hectare presents a more common national measure for density. To support improved positioning in the global marketplace, the WMR shall work with the municipalities to update data and move towards this measure of density to support broader interpretation and consistency for density interpretation.	110	Notwithstanding its concerns about infill density requirements, while the City believes including non-residential development is important, more information is required in order for the City to comment on its implementation. What unit of measurement would be used (floor area, jobs, etc.)? Would number of jobs be estimated based on floor area, and what assumptions should be used? How much non-residential development is equivalent to a residential unit?	Medium
Schedule 3	Density minimums and targets, Transformative Communities	Transformative Communities including parts of the city of Winnipeg: minimum residential and mixed-use density of 4.8 units per acre, target density of 9.7 units per acre.	67	Greenfield densities should not be difficult to achieve. Greenfield densities are currently averaging between 12 and 15 units per acre. The City is amenable to the proposed density requirements and targets.	Low-medium
1.1.12	Rural residential development	To protecet agricultural lands, prevent fragmentation, and encourage complete communities, new rural residential designations, including cottage development, shall only be permitted outside the Inner Metropolitan Area and beyond the commutershed boundary identified in Schedule 1 if the municipality has met the following criteria: a) The proposed rural residential lots represent a maximum of five-year land supply based on the municipality's last five-year absorption rate of rural residential land; b) 90% or more of the municipality's existing rural residential land supply has been built out; c) Can be developed in a contiguous form where planned open space may be considered a component of such development through conservation design; d) Have completed an agricultural impact assessment to identify the potential adverse impacts of the proposed development on agricultural lands and existing agricultural operations, in accordance with the policies of this plan; e) If proposed rural residential is located on or adjacent to natural assets identified in Schedule 3, environmental and technical studies completed by qualified professionals shall be submitted, identifying the impacts of development on natural assets, include conservation buffers, development setbacks, and mitigation measures into the proposed development, following conservation subdivision design; and f) Be serviced with on-site water and wastewater infrastructure in accordance with provincial regulations. Areas located in the Red River Corridor as identified in provincial regulation shall require conneciton to municipal wastewater infrastructure.	69	While this does not appear to be the case, please confirm that this policy would not impact the issuance of building permits for new dwellings in areas of the City of Winnipeg that currently allow for rural residential development via secondary plan.	Low-medium

Policy no.	Topic	Policy	Pg	Comment	Level of interest
1.1.16	Housing	Market affordable and affordable housing shall be planned in a coordinated and collaborative way to address housing need through the following measures: a) Preparation and implementation of Regional Housing Strategy; and b) Advocacy to the provincial and federal governments to provide long term sustainable sources of funding to address regional housing priorities and the specific needs of communities.	70	There is an opportunity in the plan's Housing policies to provide additional direction with regards to the provision of affordable housing by highlighting some tools municipalities could use to support/require affordable housing. It could also identify partnerships with other levels of government to tap into affordable housing programs - policy could encourage municipalities to develop local programs to leverage these funding sources (such as the National Housing Strategy, which typically requires support from other levels of government)	Low-medium
1.2.16	Regional recreation facilities management	To support the management and accessibility of high quality social, cultural, educational, and recreational opportunities to all municipalities, regional recreational assets are identified and protected in this plan. Regional recreation shall: a) Focus on community and cultural interests and uses, with focus on regional recreation assets as per Schedule 3; b) Include the consideration of management through shared servicing agreements; and c) Support opportunities for passive recreation and co-location of assets in locations that foster a natural asset network as per policies in this plan.	75	The City would be interested in shared servicing agreements for recreation facilities provided there is capital and operating cost sharing.	Low-medium
1.2.17	Recreation assets and services operation	To ensure sustainable fiscal stewardship and industry best practice in operating and maintaining recreation assets and services, municipalities shall: a) Consider partnerships and collaboration for the inter-municipal use of recreation services, including private-public partnerships; b) Focus on the co-location of recreation services and multi-purpose facilities with a contemporary mix of recreation options to meet long-term needs; and c) Support the development of recreation asset management programs that fully evaluate the lifecycle of recreation assets to guide and maximize investment decisions as per the policies of this plan.	75	The City is committed to partnerships and collaboration in the development and operation of recreation facilities. Said partnerships do need to demonstrate mutual financial and/or public benefit to all partners. The Winnipeg Recreation Strategy places high priority on co-located, multi-use, multi-generational recreaiton facilities. City asset management policy fully supports developing recreation asset management programs to evaluate asset lifecycles with an aim towards maximizing investment decisions.	Low-medium
1.2.18	Emergency preparedness	To protect communities from risk and hazars and provide resiliency, municipalities shall: a) Direct growth away from areas deemed at risk from natural hazards, including: i) Areas included in the Designated Floor Area in accordance with provincial regulation; ii) Areas at risk from climate change induced hazards. b) Review fire suppression requirements as per the Manitoba Office of the Fire Commissioner and Manitoba Water Services Board guidelines and updating firefighting protection plans accordingly; c) Consider emergency response catchment areas; and d) Incorporate standards for fire, emergency response, and water supply, with a focus on National Fire Protection Association (NFPA) standards as a model.	76	Regarding a), in addition to "directing growth away from", consider the establishment of development requirements and regulations to protect new developments from existing and anticipated natural and environmental hazards and establish strategic programs to address critical risks in existing communities.	Low-medium
3.1.2	Watershed management planning	To support watershed health, municipal development plans shall be based on watershed planning to inform: a) The identification of water resource systems to provide for the long-term protection of key hydrologic features, key hydrologic areas, and their functions. b) The protection, enhancement, or restoration of the quality and quantity of water; c) The establishment of development controls that protect aquatic life and ecosystems; d) Decision on directing growth; and e) Planning for water, wastewater, stormwater and drainage infrastructure.	90	Consider modifying clause d): Decisions on directing growth with consideration for natural processes including surface water attenuation and detention, riverbank erosion, river meandering, slope instabilities, and flooding.	Low-medium
3.1.4	Watershed management plans	To support best practive, the planning, design, and construction of new development and infrastructure in greenfield areas and built-up areas shall: a) Be informed by Integrated Watershed Management Plans; b) Incorporate innovation and low-impact development stormwater practices; and c) Use internationally-recognized Canadian Standards Association (CSA) tools as a model.	90	What is specifically meant by Integrated Watershed Management Plans, and in what ways could they conceivably influence development in greenfield and built-up areas? Who undertake them and when, and under what parameters?	Low-medium
3.2.1	Natural Assets Network Priorities Plan	To identify regional natural assets to protect, restore, and enhance linkages, the WMR shall prepare a Natural Assets Network Priorities Plan. The Plan shall at a minimum: a) Identify, map, and assess the condition of natural assets, systems, and corridors, critical and significant habitats, and water resource systems; b) Identify and map species- and ecosystems-at-risk; c) Identify and evaluate ecosystems and habitat with significant biodiversity values; d) Limit the fragmentation of habitat and support wildlife corridors through the protection, conservation, and enhancement of connectivity between natural areas, where appropriate; e) Incorporate considerations for sustainable community design; f) Support adaptation and resilience to climate change and climate variability; g) Incorporate recognition of traditional Indigenous knowledge and support traditional lifestyles; and h) Support passive recreation and active transportation trail connections, with a focus on Regional Recreation Assets, Regional Active Transportation Trails, and regional natural assets as per Schedule 3.	91	How will the City be engaged in developing a regional plan? What happens if there is disagreement on habitat quality between the City and the WMR?	Low-medium
3.2.2	Natural asset designation	To create resiliency to climate change and climate variability, municipalities shall pursue an adaptive ecosystem-based approach with an emphasis on natural assets. Municipalities shall be required to reflect regional priorities by: a) Ensuring a land designation is established in municipal development plans and secondary plans to preserve, restore, and enhance the connectivity of natural assets. This includes at minimum: i) Native vegetative communities; ii) Tree canopy including urban, riparian, and upland forests, woodlots, and shelterbelts; iii) Natural assets with significant biodiversity value, especially where it protects habitat, supports species- and ecosystems-at-risk, contributes to overal ecological function and enhance ecosystem goods and services; iv) Diversity and connectivity of the network and the long-term ecological or hydrological functions of features. b) Promoting programs that incentivize environmental stewardship on private and public lands meant to protect, restore, and enhance natural assets and ecosystem goods and services especially as it relates to flood and drought mitiation, source water protection, and carbon sequestration; c) Restricting development in wetland and riparian zones as per provincial regulation. Where development may be considered, municipalities shall consider the acquisition of the wetland and/or riparian zones, as public reserve and as an investment into green infrastructure; and d) Developing and maintain a land acquisition program as a tool to protect and support natural assets and their ecological functions and to support green infrastructure investment.	91	Typically evaluation of natural areas is done at a secondary plan or subdivision/rezoning stage, as it is a more granular process than at a development plan level. The City may be challenged to identify these lands at this stage.	Low-medium

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3.3.1	Identify flood prone lands	To protect communities from significant flooding, protect water recharge and retention areas, reduce drisk, and build regional resiliency, municipalities shall: a) Identify lands subject to significant flooding, erosion, or bank instability not already identified as Designated Floor Area under provincial regulation; b) Identify lands located in potential water recharge/retention areas; c) Identify the risk posed by climate change induced flooding and drought to communities and water supply; and d) Establish development restrictions for lands subject to signficant flooding, erosion, bank instability, or located in potential water recharge/retention areas to encourage that they be left in a natural state or developed only for low intensity use such as passive recreation, grazing, cropping, forestry, and wildlife habitat.	92	Please confirm that the identification of the lands discussed in a) would be done in the development plan. The current Designated Flood Area designations should be updated, as they were established (for the City of Winnipeg) in 1982, prior to the 1997 flood, prior to any understanding of climate change and its impact on flood risk, and prior to the Floodway expansion. Futhermore, with advances in technology including LiDar, multi-beam sonar, and 2-D and 3-D hydraulic modeling, our ability to map flood risk is greatly enhanced, and updated flood risk mapping may look quite different than the current maps. Suggested modification to a): "Identify lands subject to flooding, erosion, or bank instability and establish and/or modernize flood risk mapping, and update Designated Flood Area regulations". Alternatively, a) is not applicable to most of Winnipeg, given that it has other flood regulations in place; consider revisions that recognize this. Cropping and forestry, and to a slightly lesser degree grazing, cannot be considered low intensity with respect to recharge/retention area. Cropping and forestry greatly affect the amount of infiltration, evaporation, evapotranspiration, storage, and surface water runoff. The conversion of grassland and forest to agricultural land has had a huge impact on flood risk across the prairies. Furthermore, many water quality issues, both for ground and suface water, can be linked to agricultural activities, and some might also say forestry/deforestation. Forestry and agriculture also have a direct and negative impact on rates of erosion and bank instabilities. Consider removing grazing, cropping, and forestry from d). Suggested modification: "Establish development restrictions and design criteria for lands subject to significant flooding, erosion, bank instability, or located in potential water recharge/retention areas to encourage that they be left in a natural state or developed only for low intensity use such as passive recreation and wildlife habitat."	Low-medium
4.1	Food security	See references throughout the plan	97	There are numerous references to food security throughout the document, including in Policy Area 4 "Resource Management". It should be noted that ensuring food security in the region requires more than protecting agricultural lands for food production, but attention to accessibility of food through economic or other means, and the adequacy and acceptability of that food. Additional attention is required to food trade, postharvest food processing, food prices, and socioeconomic status of consumers, among other things. Further, most agricultural goods in Manitoba are intended for export markets, meaning they are not used for local consumption, with much not necessarily intended for human consumption; those that are may require processing before they are table ready, infrastructure that in many cases does not exist in the region. The plan should acknowledge these gaps and the need for them to be addressed if it is to argue that protection of agricultural lands is for the benefit of health and a secure food supply for the residents of the region.	Low-medium
4.1.5	Regional Agricultural Master Plan	To ensure protection and preservation of agricultural lands, the WMR shall prepare a Regional Agricultural Master Plan in collaboration with its municipalities, Indigenous Nations, and other stakeholders. The regional Agricultural Master Plan shall: a) Support the monitoring of agricultural land status; b) Identify and pursue strategies and actions related to regional food security, specialized agricultural opportunities, and agricultural infrastructure investment; c) Encourage working with Indigenous Nations to foster and support agricultural production on Indigenous-owned lands; and d) Define the requirements of the agricultural impact assessment tool.	97	To what extent is a Regional Agricultural Master Plan envisioned to apply to Winnipeg?	Low-medium
4.1.2	Agricultural lot size	To limit agricultural land fragmentation and facilitate agricultural uses within the region, a minimum 80-acre agricultural parcel size shall be established.	97	Please confirm that this minimum 80 acre agricultural parcel size would not be applied in the City of Winnipeg and provide this direction in policy.	Low-medium
5.1.1	Standardized land use designations	To ensure effective regional coordination of land use designations, the WMR shall work with municipalities and the province to develop and establish a clear, consistent, and standardized land use designation framework for the Winnipeg Metropolitan Region.	102	There is merit to the intent of this policy, but the WMR/Province must acknowledge that standardized land use designations may not always be appropriate - exceptions may be needed to best address local conditions.	Low-medium
5.3.1	Data sharing	To support infrastructure investment and development of complete communities, the WMR shall collaboratively develop and establish a data sharing program for municipalities to encourage the availability and accessibility of information to enable more effective regional coordination and analysis. The program shall: a) Establish standards, methods, and protocols for data collection, storage, and delivery using internationally ISO developed tools as a model; b) Ensure interoperable, consistent, and accurage information is produced and shared across the region while respecting the requirements for data protection and privacy as per regulations; and c) Establish a template for data sharing agreements.	103	Generally speaking, the City is strongly supportive of proposed data collection and sharing policies.	Low-medium
6.3.1	Application of density requirements	Density shall be applied to greenfield areas that are planned for either residential or mixed-use development, recognizing that these are typically completed at a master plan scale. In these cases, minimum density will be calculated on a variety of residential housing typologies and scales such as single-unit, townhouse, and apartment, as well as on non-residential units where applicable. Densities across these sites shall vary and may be phased, however, densities shall be calulated over the entire site. A Density Guide developed by the WMR will provide additional guidance for density.	108	Clarification is desired on this policy's application. The second sentence indicates that densities will be calculated on a single unit/building, but the last sentence indicates that they will be calculated over the entire site. Also, how is a site defined? This policy indicates that this shall only apply to greenfield areas; a similar policy is needed for infill density targets. How would densities be calculated on non-residential units?	Low-medium
6.6.5	Monitoring and reporting	Key Performance Indicators (KPI) are quantifiable measures that support interpretation and effective evaluation of regional policy against the intended outcomes. They also reflect and evaluate the progress of Plan 20-50 to meet global best practice including the United Nations Sustainable Development Goals. Measuring KPIs supports updates on the Regional Growth and Servicing Plan to respond to changes observed. The WMR shall annually report on the implementation of Plan 20-50 and its progress towards meeting goals using the identified KPIs. Some KPIs can be measured in the short-term while others can be measured in the longer term of the Plan. KPIs presented are preliminary and will be finalized for implementation.	113	Regarding KPIs, consider using the same approach as was used in Appendix 1 of OurWinnipeg 2045 and simply indicate whether they seek an increasing or decreasing trend in a given KPI as a preliminary level of assessment for their suitability and measurement. Where appropriate, the City would encourage the KPIs to align with those used by the Municipal Benchmarking Network Canada for ease of comparison with other jurisdictions. Consider how the KPIs could better link to the UN Sustainable Development Goals to provide a better indicator of whether plan goals are being achieved. Procedurally-speaking, in reporting annually on achievement of its prescribed indicators, can it be assumed that the WMR will solict requirement information from member municipalities and then report on it themselves? How is "infill" defined? What is meant by "number of assets that have been assessed by the regional government"?	Low-medium
n/a	History of planning in the region	n/a	8	Consider including a fulsome list of the multiple reviews, studies, and reports on the Capital Region that came before this plan in an appendix.	Low
n/a	Regional structure	"The regional structure fosters sustainable climate-resilient growth, supports the development of complete communities, and considers the servicing and infrastructure investments needed to meet the demands of the future at scale."	49	In the final sentence of the last paragraph, what is meant by "at scale"?	Low
n/a	Description of Transformative Communities	"Plan and develop new communities and greenfield areas that are compact, contiguous, and compatible with existing development with a mix of land uses including a range of housing and employment types and where it is logical to extend infrastructure and services."	56	In the fourth bullet, there is reference to "new communities and greenfield areas". What is the distinction between these two terms? In OurWinnipeg/Complete Communities, these are generally the same thing.	Low

Policy no.	Topic	Policy	Pg	Comment	Level of interest
1.2.1	General infrastructure investment	To capitalize on efficiencies, planning for new or expanded infrastructure shall occur in an integrated manner and include: a) Evaluations of long-range scenario-based land use planning, environmental planning, and financial planning; and b) Support by relevant studies that should involve: i) Leveraging infrastructure investment to direct growth and development in accordance with the policies and schedules of this plan, including the achievement of the minimum intensification and density targets as Schedule 3; ii) Providing sufficient infrastructure capacity in the Metropolitan Core, Inner Metropolitan Area, and Urban Centres; iii) Identifying the full life cycle costs of infrastructure and developing options to pay for these costs over the long-term through asset management planning; and iv) Considering the impacts of a changing climate and opportunities for green infrastructure.	71	Green infrastructure will need to be studied for feasibility and effectiveness in the Winnipeg region.	Low
1.2.3	Water and wastewater	To ensure sufficient revenue to recover the full cost of providing and maintaining necessary services, planning for full municipal water and wastewater services shall be coordinated, where possible: a) Municipalities shall explore opportunities for service sharing when infrastructure expansion and upgrades are required; and b) Capital infrastructure investments shall be identified in partnership with the Manitoba Water Services Board when applicable, with a focus on the Metropolitan Core, Inner Metropolitan Area, and Urban Centres.	72	The City is not able to extend water outside City limits due to existing agreements.	Low
1.2.5	Investment in water and waste infrastructure	To support growth, infrastructure investment shall be optimized by: a) Requiring compliance to level of wastewater treatment as per the Manitoba Water Quality Standards, Objectives, and Guidelines; and b) Requiring that where communities exceed defined growth thresholds, they shall upgrade wastewater treatment facilities to meet effluent treatment limits in accordance with provincial regulation.	72	Request that a) be revised to account for the fact that Environment Act licenses contemplate specific treatment requirements for Winnipeg.	Low
1.2.12	Zero Emission Vehicle Strategy	To support greenhouse gas mitigation and advance low carbon transportation options, a Zero Emission Vehicle Strategy shall be developed by the WMR in association with its member municipalities and other stakeholders. The strategy shall at minimum: a) Identify potential zero emission vehicle charging/refuelling corridors; b) Identify opportunities to install and align supporting infrastructure, with a focus on public transit, employment areas, housing, and regional park and ride facilities; c) Develop guidance for charging infrastructure procurement processes and lifecycle management; and d) Identify methods to gather and analyze zero emission vehicle movement and usage data to support charging infrastructure assessment and investment prioritization.	74	The City's Public Service is interested in this concept and would be supportive.	Low
2.1.2	Aligning Regional Economic Development Framework	To align local efforts with a Regional Economic Development Framework, municipal development plans and economic development plans and strategies shall support a goal to: a) Promote existing and emerging sectors of economic growth to foster job creation and optimize global economic competitiveness; and b) Support the economic development role of Regional Employment Areas through land use and transportation policies.	82	Other than providing for Employment Lands, it is not apparent how OurWinnipeg/Complete Communities as development plans would promote existing and emerging sectors of economic growth. Clarity is desired to better understand what the WMR has in mind.	Low
2.2.1	Priority employment lands	An adequate supply of land shall be protected by municipalities to accommodate the employment projections in Schedule 2 provide a variety of employment types and support economic diversification. Priority employment areas (lands) shall be defined.	82	What is a priority employment area? Is it different than Regional Employment Areas?	Low
2.2.5	Employment lands servicing	To support economic prosperity and viability of employment lands, the WMR shall work to ensure employment uses of regional significance are directed to appropriate locations with full municipal servicing.	84	Some industrial uses are highly demanding on existing servicing capacities. Consider recognizing this in policy.	Low
2.2.6(d)	Mixed use development	To support employment growth, municipalities shall coordinate land use planning and development by: a) Promoting intensification, making more efficient use of vacant and underutilized employment areas; b) Planning for and promoting clusters to link economic activity, innovative technologies, human resources, and optimize servicing infrastructure; c) Planning for and promoting multi-modal transportation options and acess to existing employment densities; d) Supporting mixed-use development, office use, and institutional clusters within the downtown, central business district, or local main street in the Metropolitan Core, Inner Metropolitan Area, Urban Centres, Rural Centres, and Settlements; and e) Promoting the growth of resource-related economic activities that: i) Encourage agricultural diversification and value-added production by planning for and promoting clusters of specialized agricultural operations; and ii) Support mineral and aggregate resources extraction.	84	Clarity is desired on the the distinction between Downtown and Central Business District, as well as the definition of local main street.	Low
2.2.7	Regional infrastructure	To maximize infrastructure investments, regional infrastructure investment shall: a) Support the development of Regional Employment Areas identified in Schedule 5; b) Support economic opportunities across the region through regional coordination and incentives; and c) Support equal access to high speed and high-quality broadband coverage to bridge the urban and rural digital divide.	84	(a) is written as though any regional infrastructure investment must support Regional Employment Areas, which is surely not the intent, since some regional infrastructure is unrelated to these areas.	Low
Schedule 5 (map)	Regional employment areas	See map	87	Regarding the map's legend, should hospitals and universities not be considered regional employment areas?	Low
3.1	Watersheds	Objective of Integrated Watershed Management Planning policies: to protect features, functions, and ecological health subject to watershed boundaries.	90	Consider the following change: To protect features, functions, and ecological health **of watersheds**.	Low
4.2.1	Mineral and aggregate resources extraction	To recognize mineral and aggregate potential, municipal development plans and secondary plans shall include policies to protect and preserve areas for extraction and identify lands designated for mineral and aggregate extraction including but not limited to areas identified on Schedule 7.	98	Please confirm that this will not apply to the City of Winnipeg and provide this direction in policy.	Low
5.3.2	Development of a data sharing tool	To support efficiencies and accessibility to data, in collaboration with municipalities, the WMR shall pursue the development of a tool to actively disseminate data while adhering to applicable legislation including privacy, security, and confidentiality provisions.	103	Where possible, the City would encourage the WMR to leverage and support existing data collection and sharing tools currently in use by municipalities and non-profit organizations, rather than developing a new tool.	Low

Policy no.	Topic	Policy	Pg	Comment	Level of interest
6.2.1	Regional Context Statements	A Regional Context Statement shall describe how existing development plans shall be brought into conformance with Plan 20-50. This process will include consideration of: a) Description of how the Winnipeg Metropolitan Regional Structure to 2050 applies; d) The intent of the Integrated Communities and Infrastructure policy area, including the expectations for density and serviced development; e) The intent of the One Environment policy area, including of protection of natural assets and integration of local environment and recreation connections; f) The intent of the Resource Management policy area, including the recognition of prime agricultural lands and mineral and aggregate resources; g) The intent of the Investment and Employment policy area, including recognition of the regional transportation infrastructure and modal shift policies, support of regional and local employment areas, and the depiction of Regional Employment Areas in municipal mapping; and h) The intent of the Collaborative Governance policy area, including opportunity for partnerships.	106	A Regional Context Statement also ought to reflect Provincial regulatory requirements uniquely applicable to City infrastructure, such as those related to combined sewer overflows.	Low
Glossary	Local level of service	A range of services that meet the daily needs of the local community and may include: local employment and convenience retail; smaller scale arts, entertainment, cultural, leisure, and sports amenities; some or all levels of primary and secondary education; services with potential for local or commute transit service; limited government services; some community health and small medical facilities; and potential for social and supportive services.	123	Since level of service typically has a different meaning specific to an individual service, consider an alternative term, such as "scope of services".	Low