



MANITOBA ECO-NETWORK

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MbEN comments on Plan 20-50

Comments from the Manitoba Eco-Network

The Manitoba Eco-Network (MbEN) appreciates this opportunity to comment on *Plan 20-50*, the Winnipeg Metropolitan Region's long-term regional growth and servicing plan. Since 1988, MbEN has promoted positive environmental action by supporting people and groups in our community. MbEN's programming focuses on policy advocacy, engagement in consultation processes and developing capacity building tools that benefit the environmental non-profit sector and our member groups.

Plan 20-50 is the draft plan for Winnipeg and the surrounding region that intends to shape the capital region for the next 30 years, and is coined as "the blueprint for a resilient, sustainable, and globally competitive Winnipeg Metropolitan Region"¹. While we agree that some form of regional planning would be beneficial for coordinating the activities of the various municipalities in the capital region, we are concerned about the lack of transparency throughout the *Plan 20-50* process, and the changes to the governance structure for the Capital Region as a result of enactment of Bill 37, *The Planning Amendment and City of Winnipeg Charter Amendment Act*.

Winnipeg's Role in *Plan 20-50* and the Metropolitan Region

Bill 37, passed on May 20th, amends the *Planning Act* and the *City of Winnipeg Charter Act*, and proposes a Capital Region Planning Board that will consist at a minimum of a representative from each of the 17 towns, villages, cities, and rural municipalities surrounding Winnipeg, plus at least one representative from the City of Winnipeg. While this board structure allows for rural municipalities to have an equal voice at the table, we are concerned that the structure does not take into account Winnipeg's higher population share. This method of representation at a body making key decisions affecting all residents of the region is not democratic, and should be restructured in a way that acknowledges Winnipeg as a distinctive hub with different priorities compared to surrounding municipalities.

MbEN is concerned about the increased influence the Capital Region Planning Board will have over development and land use planning within the City of Winnipeg with the implementation of *Plan 20-50*. Provided the enabling legislation, Bill 37, is proclaimed, municipalities, including Winnipeg, would be given three years to update existing development plans, lower level plans,

¹ Winnipeg Metropolitan Region (2021). *Plan20-50: Regional Growth and Servicing Plan (draft)*. Winnipeg Metropolitan Region: https://20to50.ca/wp-content/uploads/2021/04/Draft_Plan20-50_FNL_R2.pdf p. 3.



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zoning by-laws, and amendments to conform with the regional plan². While it is true that Section 92(8) of the *Constitution Act, 1867*, places the governing power for 'municipal institutions in the province' solely with the provincial government³, historical practice in Manitoba has been to recognize the City of Winnipeg's unique position through the delegated powers described in the *City of Winnipeg Charter Act*. There should be autonomy maintained for the City of Winnipeg to create development plans and its democratically elected council members to determine planning decisions without major interference from outside influencers.

Winnipeg's population share, urban structure, and priorities are different from the surrounding rural municipalities, and Winnipeg's standing in a planning region is different from other major Canadian cities with planning regions such as Vancouver and Edmonton, two cities that were frequently referenced in the *Plan 20-50* process. Winnipeg's population share in the metropolitan region is at 86.5%⁴, compared to Vancouver's population share at only 26%⁵ and Edmonton at 70%⁶. Vancouver and Edmonton both have other cities in their regions that also function as economic hubs, however Winnipeg is the sole economic hub of its metropolitan region, with significantly smaller hubs in Stonewall, Selkirk, and Niverville. While some comparisons can be made to the positive impacts of Metro Vancouver and the Edmonton Metropolitan Region Board, there should be acknowledgement that Winnipeg's scenario is different due to the city's economic contributions compared to surrounding municipalities. A plan for the capital region should respect that, and provide Winnipeg its resources to continue as a charter city.

The Transparency of the *Plan 20-50* Process

MbEN has participated in the *Plan 20-50* process through virtual consultation sessions and provided input on policy, especially the *One Environment* policy area. We appreciate being involved as a stakeholder, and hope to continue providing valuable input in creating a more sustainable capital region.

2 Winnipeg Metropolitan Region (2021). *Plan 20-50: Regional Growth and Servicing Plan (draft)*. Winnipeg Metropolitan Region https://20to50.ca/wp-content/uploads/2021/04/Draft_Plan20-50_FNL_R2.pdf p. 107

3 Government of Canada (1867). *Constitution Act, S. 92(8)* https://laws-lois.justice.gc.ca/PDF/CONST_TRD.pdf

4 Winnipeg Metropolitan Region (2016). *A Regional Growth Strategy and Population Analysis* https://winnipegmetroregion.ca/assets/docs/regional_strategies_and_plans/PMCR_RGS_Context_Report_Population.pdf (Calculated from dividing Winnipeg 2011 pop by Capital Region 2011 pop, then multiply by 100%)

5 Metro Vancouver. 2016 Census Bulletin - Population <http://www.metrovancouver.org/services/regional-planning/PlanningPublications/2016CensusBulletinPopulation.pdf>

6 Edmonton Metropolitan Region Board (2017). *Edmonton Metropolitan Region Growth Plan* [https://emrb.ca/Website/media/Shared/Banners/EMRB-Growth-Plan-\(2020\).pdf](https://emrb.ca/Website/media/Shared/Banners/EMRB-Growth-Plan-(2020).pdf) (Calculated from dividing Edmonton 2014 pop by Total Region 2014 pop, then multiply by 100%)



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However, we've noticed a lack of transparency in the consultation process which is concerning for a major development plan that involves multiple stakeholders. For example, there seemed to be a high degree of control exerted through the virtual consultation format, as participants were unable to see who the other representatives were, and questions submitted were hidden from other participants attending the virtual meetings. Overall, we feel the organizers of the consultation process have not made a concerted effort to replicate the level of engagement which would be possible in-person, despite the fact that the WMR has touted this as a very transparent and collaborative process.

We are also concerned that key information about the engagement process is being intentionally withheld from the public. We have been unable to obtain information about which key environmental stakeholders have also been involved, despite asking several project partners for this information directly. Since MbEN works collaboratively with groups across the environmental non-profit sector, this information is important because we operate as a network and coordinate with other groups to respond to key policy issues. If the WMR wants organizations to provide valuable input on their draft policies, they should make stakeholder information public and give participants the opportunity to collaborate and issue joint recommendations.

Conclusion

MbEN supports regional planning and believes a plan to coordinate future growth and management in the capital region is needed. However, we believe that *Plan 20-50* should continue to recognize Winnipeg's position as the major economic hub of the region, and respect its unique autonomy in the city's planning and development. Furthermore, we did not feel comfortable providing comments on the plan's content itself due to the fundamentally flawed engagement process we have experienced so far. The current engagement process has not been transparent, and could be improved by making more information about the process publicly available and allowing for joint input across the WMR's policy areas.

MbEN appreciates the opportunity to contribute to the development of *Plan 20-50* and hope that our input is taken into consideration. With improved transparency and engagement measures, we welcome future opportunities to collaborate with the Winnipeg Metropolitan Region and contribute to sustainable planning and development in Manitoba's capital region.