

OURS-Winnipeg Response to the City of Winnipeg Proposed 2020-2045 Planning Documents

October 5, 2020

- OurWinnipeg 2045: Development Plan (Draft)
- Complete Communities: OurWinnipeg Direction Strategy (Draft)
<https://engage.winnipeg.ca/planning-for-our-shared-future>

INTRODUCTION

OURS-Winnipeg (Outdoor Urban Recreational Spaces – Winnipeg) is a city-wide, community-based, greenspace advocate organization with a focus on urban greenspace, river and nature corridors and the urban forest. Parks, greenspace (including golf courses) and natural areas are essential to making Winnipeg an attractive place to live, work and visit.

OURS-Winnipeg supports the vision for General Growth to ensure the city is livable, affordable, and desirable for all. OURS-Winnipeg has major concerns with the framework and direction the documents (Draft, OurWinnipeg 2045 and Complete Communities: OurWinnipeg Direction Strategy) provide regarding environment, climate change, water, greenspace, park lands and natural areas. We are concerned with the lack of policy and targets throughout the draft plans and guiding documents that would ensure this vision could be fulfilled and greenspace protected from development.

MAJOR CONCERNS/ISSUES

1. **Major Open Space (MOS) policy will enable development on park lands and greenspace. There are a number of polices in the documents that support enabling development on Major Open Spaces (regional parks, nature parks, forests golf course lands, riparian areas, tree canopy).**

We are particularly concerned by the designation of Major Open Space in Winnipeg's draft documents which begins with singling out the scale and character of major open spaces identifying them attractive to development. Some of the MOS shown on the map (CC 2.0 p. 120) are Kildonan Park, Bois des Esprit, Whittier Park, King's Park, Canoe Club Golf Course and Kilcona.

The city must change the MOS policy to ensure the preservation of greenspace, parks and natural areas for a growing urban population. Winnipeg's population is forecast to grow by 120,000 over the next 20 years. Hotter summer days, storms and flooding events are forecast to increase. The climate change impact must be mitigated by larger green spaces, natural areas and a wide-spread tree canopy.

- Development on park land would set Winnipeg behind and apart from other Canadian cities that are planning for and adding to their greenspace and natural areas.
- Winnipeg has 6% (of total city area) parkland - below average compared to the average for other major Canadian cities which are at 9% (2020 Parks People Report - <https://ccpr.parkpeople.ca/#nav>)

- Winnipeg has 36% natural areas in its parks - below average compared to the average for other Canadian cities at 44%.
- Adding golf course lands (1% of total city area) to parks and recreation lands would increase parkland to 7%, still below average compared to other major Canadian cities
- Development on MOS would reduce Winnipeg's below average amount of parkland

Winnipeg must have a plan to better protect and increase its greenspace and natural areas and urban canopy and to discourage plans to develop it.

2. Wording of Major Open Space document will facilitate permanent loss of public greenspace

We are concerned that the Major Open Space designation, as worded, **will enable development** on the largest green spaces and parklands, including riverside, parks and forests in the city. The current wording of MOS policy references these lands as desirable for development without any reference to their importance in climate change mitigation and ecological benefits to citizens.

MOS policy has guidelines for how development would occur

In contrast to the Winnipeg Employment Lands policy (CC 2.0 4.0 to 4.3, 4.10, p.104), MOS outlines how development could occur. It identifies MOS as "significant lands", and relevant when there is a proposal to convert land to another use.

Contradictory content

MOS provides contradictory ideas. CC. 4.1.3 p. 143 "Demonstrate the City's commitment to natural area preservation specific to large scale parcels by the added designation of Major Open Space". This "preservation" comes into effect when there is a secondary plan approved that would convert Major Open Spaces to development. The normal land dedication derived from this process is 8-10% or cash in lieu. Plans that are less than two acres in size do not require a park plan. It is unclear how this would demonstrate a commitment to natural area preservation.

The intent of a development plan is to develop

Protecting parkland is a very small subset within the secondary plan. Secondary plan application submission requirements do not ask for a park, natural areas or tree protection plan. For areas smaller than two acres a secondary plan and a park plan are not required at all.

<https://winnipeg.ca/ppd/Documents/Zoning/DevelopmentApplication/Secondary-Plan-SP-or-SP-Amendment-SPA.pdf>

Enabling development on Major Open Spaces would present barriers to park planning

There are policies in the documents that enable development or disposal of Major Open Space lands (regional parks, nature parks, forests golf course lands, riparian areas, tree canopy). These policies do not reflect a commitment to protect greenspace and natural areas and most likely compromise them.

3. MOS designation appears development focused

Without an overall plan, a multitude of secondary plans and small plans would shape development on the park lands. This could be viewed as ad hoc development and accompanying ad hoc protection of some greenspace. The plan provides no limits or boundaries or caps. Could limitless small proposals be accepted, all meeting the five year increment limit? How many large plans could be accepted? What is the plan to prevent the majority of the land from being developed? **The approval of one secondary plan or small plan could set a precedent for continuous development.**

The new Major Open Space designation as it is presently worded has the potential to enable unlimited development and permanent loss of publicly owned greenspace over the duration of the 25 year plan by identifying large open spaces as attractive for development and reducing more robust planning and approval process. Strong targets for intensification are not countered by strong targets to protect greenspace or the urban canopy.

It would seem that the Major OpenSpace lands would receive the best protection if they were to remain with Parks and Recreation and have policies like those in Employment Lands (CC 2.0 4.0 to 4.3, 4.10, p.104) to discourage conversion to other uses and a plan like Heritage Conservation to protect a valued resource. (1.1 to 1.2, 2.1 to 2.4, 3.1 to 3.3, 4.5 p. 153 - 155)

4. Timely, meaningful public Engagement NOT SUFFICIENT during pandemic

In the midst of an unprecedented global pandemic timely, meaningful public engagement opportunities for the review of the draft documents were not sufficient. That portion of the population that does not have access to the Internet was excluded from the consultation. Even library internet was not available.

There remains a large gap in policy directives regarding greenspace and climate adaption and mitigation even though many groups were consulted over the making of this document. This is reflected in the dearth of greenspace protection, water protection and climate adaption and mitigation policy with related natural solutions.

It is unclear what the scope of public feedback received was, and how it was incorporated into the OurWinnipeg policy and how it was evidence informed.

5. Guiding Documents incomplete or unfunded or outdated

The pandemic delayed completion of guiding documents including the Parks Strategy, Urban Forest Strategy, Tree by-law, Recreation Strategy and Infill Strategy. With these documents in public engagement phases their input to the planning documents would be limited if available at all. Funding for a Climate Adaption and Resiliency Strategy was declined in the 2020 Budget potentially leaving a gap in place of what it could have provided.

6. UN Goal contradiction

One would expect the primary goal for regional parks, nature parks, forests golf course lands, riparian areas, tree canopy to be UN Goal #2 Environmental Resilience. Instead Major Open Space is placed in UN Goal #6 City Building (OurWinnipeg 2045 p. 17) which is primarily a development goal. This placement suggests the primary goal of MOS is development over protection.

The separation of Parks and Recreation, Major Open Space and Riverbanks among three sections of the document compromises a holistic environmental perspective for planning and protection. These three have an environmental focus and should be primarily grouped together as UN Goal #2 Environmental Resilience does with Life below Water, Life on Land, Climate Action, and Clean Water

7. City is open to re-purposing or sale of public greenspace

City is moving in a direction away from protecting/enhancing its parkland and urban canopy

Recent budget planning decisions approved by the City have not supported park planning and have opened the door to development on parkland.

The **“Transformative Fund” and “Re-purposing of Golf Course Lands” enables housing development on publicly owned golf lands with a goal of reducing infrastructure deficit.** The Transformative Fund and Repurposing of 30% of Golf Lands Plan (2020 multiyear budget) includes the conversion of publicly-owned greenspace to housing to help pay for the infrastructure deficit.

The “Requirements to Provide Services” list could be seen to result in reducing priority and investment for Park Planning, Tree Planting and Tree Pruning (except DED) by labeling them as “Not Required” services. Not investing in park planning would not bode well for Major Open Space.

8. Strong climate adaption policy and targets are needed

We are in the midst of a climate crisis. Parts of the world are literally on fire. Climate Adaption benefits will be reduced by the proposed policy resulting in loss of tree canopy cover and conversion of parkland to development.

Winnipeg is third highest among Major Canadian cities forecast to experience higher summer temperatures. The urban canopy is a critical tool for communities in combating the effects of extreme heat. Research has shown that large green spaces provide the greatest cooling benefits for hot summer days and river corridors provide cooling refuge for people and wildlife.

It is concerning that the city has chosen to not fund a Climate Adaption and Resiliency Strategy, has listed Park Planning, Tree Planting and Tree Pruning (except DED) as “not required” services when they would be contributors to Climate Adaption and Resiliency. The Government of Canada has identified extreme heat is a significant public health issue in Canada.

9. Charter Protection

Winnipeg's forefathers placed a **high value on the protection of park land giving it Charter protection that requires a 2/3 vote** of all of Council before it can be disposed of. That protection was not identified in the Major Open Space section. Although it may not normally be the practice to include charter items in a planning document it is of extraordinary significance in MOS and would be required for the approval of almost every development application.

OURS-WINNIPEG REQUESTS

1. Master Plan for Greenspace

A Master Plan for Greenspace to be implemented by the City of Winnipeg to preserve, protect and enhance its forest, greenspaces, natural environment, river corridors and connecting corridors. The 2011 City planning documents OurWinnipeg and Complete Communities provided limited direction for planning and monitoring of greenspace. With the current pace of development it is more important than ever to plan to provide sufficient protection for trees, greenspace, and natural heritage and river corridors.

A growing population is putting pressure on the City to maintain quality greenspace and natural areas for its citizens. The number of residents in Winnipeg continues to increase while the amount of greenspace does not. Adding to the concern, Winnipeg is below average compared to other Canadian cities when it comes to hectares per population of greenspace.

Other major cities have visionary greenspace plans:

- London, UK is a National Park City with 50% greenspace
- Montreal is creating the country's largest park. The proposed 3,000-hectare "Great West Park" will be eight times the size of New York City's Central Park.
- Vancouver is the greenest city in Canada through its Greenest City Action Plan (GCAP)
- Edmonton has the longest park system in Canada, including golf courses
- Toronto's Rouge National Urban Park is the first of its kind as a national park based in a city

2. Clearly articulate the protection intent of the MOS section

It appears counter intuitive that protection of Major Open Spaces comes WITH a policy to develop it. Provide wording for strong protection of major open spaces and greenspace and downplay potential for development.

3. Policy to enable development of golf course lands must be discouraged.

Recognition of golf courses as Charter protected land and their inherent contribution of a myriad of services must not be overshadowed by their attractiveness for development. Planning to protect the golf lands is necessary to ensure the land will be around for future generations. Golf Lands are situated on park zoned land; are publicly owned, heritage properties, used year round, pay their own way, contribute revenue to the city and provide ecosystem services. The golf course lands are not counted as Parks and Recreation land and so do not add to the total percentage of city parkland. Golf Services

Special Operating Agency was listed as a “Not required” service in a 2020 budget planning document. This listing could be seen to support development of this park zoned land.

4. Complete additional plans and analysis to support decision making

The 2011 Complete Communities called for a Parks Management Plan and Urban Forest Management plans which are underway.

Plans that should be added to the Implementation Action List:

- Winnipeg Master Plan for Greenspace
- Biodiversity Plan like Toronto, Calgary, Edmonton, Montreal, and Vancouver have and as supported by CC 4.3.2 p. 144 “Demonstrate a commitment to biodiversity and ecological integrity through planning, regulation, collaboration”.
- Climate Adaption and Resiliency Plan
- Tree Canopy Cover and Impervious Surfaces
- Water Management Plan
- Climate Adaption plan combined with capital asset management
- Wildlife Passage Engineering Guidelines designed to help decision makers with recommendations that will incorporate the needs of wildlife into transportation projects

5. Protection for river corridors, a precious resource for a River City

Improve health of riparian areas and their water by adopting the Provincial Planning Regulations that require at least a 30-meter buffer (wherever possible) for development along riverbanks. Studies have shown that a much wider buffer is required for ecosystem protection. Winnipeg previously received and is still using an exemption that is a weaker version of the provincial regulation. The river corridors are a mess due to more frequent flooding, erosion, unsightly rip rap repairs, weed infestations, major loss of tree canopy and development too close to the river to maintain integrity of the river banks.

6. Replace CC 4.4.2 p. 143 with “Increase greenspace and natural areas to keep pace with population growth and protected area targets by increasing requirements for parks and natural area provisions.”

The city must plan to have enough greenspace to provide parks to a growing population, to meet national targets for preservation of natural areas and to provide comfort for the increasing number of days with extreme heat. The Province of Manitoba targets protection of 17% of natural land areas by 2020. The Global and Federal target is 25% protection by 2025 and 30% by 2030; 50% is desired.