

# Provincial Land Use Policies

## *What You Told Us*

**Stakeholder & Written Feedback**



## **WHAT YOU TOLD US**

### **Provincial Land Use Policies Review**

### **Stakeholder Meeting & Written Feedback**

**March 27, 2009 to May 25, 2009**

<b>TOPIC AREA</b>	<b>FEEDBACK RECEIVED</b>
<p><b>General</b>  <i>Provincial Land Use Policies (PLUPs)</i></p>	<p><u>OVERALL IMPRESSIONS:</u></p> <ul style="list-style-type: none"> <li>• Overall, the draft PLUPs provide a better understanding of the provincial interest in planning for the sustainable development of the land and resources throughout the Province</li> <li>• In general, it is good that the proposed changes will help to strengthen the policy language of the PLUPs</li> <li>• The draft PLUPs do not take into account that our present, car dependent lifestyle is unsustainable. Land use planning is a key factor in determining sustainable development, but these policies are still based on the availability of cheap oil. Need for a moratorium on car dependent development</li> <li>• In general, the draft PLUPs take a 'business as usual' approach. Given global warming and peak oil realities, it is irresponsible for the Province to keep allowing car dependent development. The proposed policies move away from the focus of sustainable land use planning and concentrate more on providing infrastructure and services to low density, scattered "urban centers", rural residential and cottage development. This will promote urban sprawl, particularly in Winnipeg's commuter-shed</li> <li>• Overall, the Province is being hypocritical by allowing rural residential development, which relies on automobiles that are a major greenhouse gas contributor, and at the same time stating its interest in fostering climate change mitigation and adaptation. The Province does not seem to recognize in the policies that rural residential will contribute to greenhouse gas emissions</li> <li>• Overall, the number of features of the draft PLUPs are impressive, including their organization and clear language, their intent to integrate sustainable development and climate change policies into planning, and their insistence on analysis and strategic planning for the long run</li> <li>• General support for draft Policies as they show consideration for the unique situation producers face in terms of expanding and diversifying their own operations and address the encroachment of other developments on or near agricultural land</li> <li>• The proposed changes are a vast improvement over the current PLUPs. The definitions section is good, but further clarity is needed (i.e. 'beneficiaries of development', 'borne equitably'). Happy to see an effort in tying development planning with financial planning</li> <li>• The draft Policies are a welcome development in that they represent the Province's first attempt to encourage municipalities and other local authorities to develop active transportation policies through land use policies</li> <li>• Full support for the proposed changes in the draft PLUPs. In particular there is strong support for Policy Area 6: Infrastructure, with emphasis on the supply of safe potable water and the disposal of wastewater in a safe and environmentally acceptable manner</li> <li>• It will only be after the adoption of the draft PLUPs and their actual application during a development plan review that the in depth purpose of the document will be better understood. It will be through discussion, cooperation and the collaborative application of</li> </ul>

the PLUPs that future clarification and refinement of the PLUPs are identified to ensure that the objectives of the policies are mutually applied.

- Overall, the provincial priorities that the PLUPs support are conflicting (e.g. greenhouse gas reduction vs. mid-continent trade corridor; alternative wastewater mgmt vs. extension of piped services, etc). How will the contradictions be reconciled? Which policy directive will prevail? There needs to be clearer and stronger commitment from politicians to a particular course of action, and then stronger land use policies will follow to support those commitments.
- Overall, the proposed draft PLUPs address a number of ongoing development and land use conflicts and is clear in communication. In particular, it was pleasing to see more strength in supporting the agricultural industry.

ISSUE: PLUPs language

- Need further consideration for language in draft—some inconsistencies where ‘must’ vs. ‘should’ is used. Difficult as this is a policy document adopted by regulation. Makes it hard to be both a flexible and regulatory framework.
- The PLUPs must be written as requirements/regulation, not aspirations. They must use legal language strong enough to avert the risk of being over ridden to meet the short term goals of developers and traffic engineers.
- The draft regulations are toothless. They are not binding laws but are merely advisory in nature.
- There is a lot of room for interpretation in the draft PLUPs. Who does the interpretation?

ISSUE: PLUPs Consultation

- PLUPs consultation was inadequate. Only one workshop for Winnipeg, which represents 2/3's of Manitoba population, while there were 8 consultations to cover the remaining 1/3 of the population. The population in the Winnipeg area will be most adversely affected by the proposed changes to the PLUPs.
- Need to have a meaningful consultation on the next draft of the PLUPs—should ensure all info available on web and in the environmental registry at public libraries prior to consultation. Should have at least 12 publicized meetings in Winnipeg. This should all occur before Plan Winnipeg Review proceeds.
- All responses to the PLUP review from stakeholders and the public should be placed on the public record as soon as possible after they are received.

General Observations:

- One of the goals for the PLUPs review should have been the sustainability and promotion of rural Manitoba.
- Pleased with thorough consideration the department is giving to all interests involved in determining land use for the province.
- No where in the draft PLUPs is land referred to as a non-renewable resource.
- The Sustainable Development Act does not seem to be integrated into the draft PLUPs. Was it intended to be?
- Why are the PLUPs using imperial measurements when Canada is a metric country?
- Municipalities should be encouraged to complete integrated community sustainability plans, and this should be acknowledged in the PLUPs. Alternatively, strengthened prescriptions in the PLUPs might turn them into sustainability plans.
- Although climate change is mentioned in a number of places in the draft, nowhere is the

	<p>province’s Kyoto target (or any other mitigation target) set out to guide the planning process. The PLUPs provide the vehicle to ensure that land use planning helps to meet these provincial targets, by requiring that each plan incorporate the targets and demonstrate how they will be met.</p> <ul style="list-style-type: none"> <li>• The PLUPs should adopt stronger language for Capital Region land use planning, which includes directly following the provincial Principles and Guidelines of Sustainable Development.</li> </ul>
<b>Introduction</b>	<ul style="list-style-type: none"> <li>• Principle for ‘long term vision’ – Long term should be defined. Suggest that it be at least 80-100 years, the same as the estimated life cycle of a residence.</li> <li>• The Principles and Guidelines of the Sustainable Development Act should take a more central position in the PLUPs. The principle for sustainability in the draft falls short as it omits reference to the ecological limits and the key implications of resource conservation, waste reduction and pollution prevention.</li> <li>• The principles should also include reference to concepts of inclusive or universal design and child and youth friendly land use and transportation guidelines—to recognize the variability of human needs and to plan for the entire range.</li> </ul>
<b>Scope &amp; Application</b>	<p><u>ISSUE: Flexible/strict application of PLUPs</u></p> <ul style="list-style-type: none"> <li>• Concern about terminology. Want to ensure this will not result in an uneven playing field—all municipalities should be treated the same with consistent enforcement. Need further clarification on this section.</li> <li>• It is important that this does not mean that the PLUPs will be applied more strictly to growing urban centers and with more flexibility to the rural development that surrounds it (fringe development).</li> <li>• Applying policies more strictly in areas of more growth – land use planning should be based on policies, not politics.</li> <li>• The PLUPs are supposed to serve as a guide for preparing, reviewing and amending plans. Plans are to be ‘generally consistent’ with the PLUPs, taking into account local circumstances. If the PLUPs are to be ‘strictly applied’ in areas of high growth, this implies that the policies will require complete compliance and will be enforced rigidly. How then are the PLUPs a ‘guide’ in this case? Flexibility will also be needed in high growth areas to recognize the uniqueness that exists.</li> <li>• The terminology that development plans ‘must be generally consistent’ with the PLUPs diminishes the importance of the Provincial Interests as plans only have to be ‘generally consistent’ with the provincial interest.</li> </ul> <p><u>ISSUE: Applicability of PLUPs to Crown Lands</u></p> <ul style="list-style-type: none"> <li>• Will Crown cottage developments be subject to the PLUPs? Who enforces consistency?</li> <li>• Forest management companies are required to produce long range and annual plans for their operations, Crown lands managed by the Province seem to be exempt from such requirements. The Province needs to subject itself to the same planning requirements that it imposes on others.</li> </ul>
<b>Definitions</b>	<ul style="list-style-type: none"> <li>• Urban Centre - Need to clarify that the 25 residences need to be concentrated. Concern that some historical areas with 25 houses scattered over a couple of square miles might demand to be designated urban in development plans. A geographic area or perimeter, as well as density factor should be included to clarify this definition.</li> <li>• Urban centre – definition should be based on the statistics Canada and Municipal Act definitions – an area with at least 1,000 residents and a population density of at least 400 residents/sq km.</li> </ul>

	<ul style="list-style-type: none"> <li>• Urban Centre – use census Canada definition.</li> <li>• Viable Lower Class Land – concern regarding removal of language re: ‘economically viable’ lower class land. That language helped determine viability as not all physically viable land is economically viable as it would cost too much to make it productive, etc.</li> <li>• Aquatic Ecosystems – this term is bolded in Water Policy Area, but there is not definition.</li> <li>• Sustainable Development – perhaps there needs to be more wording to clarify what it means or added to the list of definitions. This is a fuzzy subject.</li> <li>• New Growth Area – the words ‘medium term planning horizon’ are used in this definition but not defined.</li> <li>• Infrastructure – does not include recreation infrastructure. Recreation plays a significant role in municipal operations and should be included in the definition.</li> <li>• Definitions of ‘air’ and ‘land’ are needed.</li> <li>• Rural residential – needs a consistent definition of large lot size, preferably in metric measurements with a conversion chart showing sq ft and acres.</li> <li>• Specialized Agricultural Operation – should include ‘organic crop/food production’, and also define this term.</li> <li>• All definitions should be checked for accuracy and congruity with international, national and provincial definitions.</li> </ul>
<p><b>Development Plans</b></p>	<p><u>ISSUE: Inclusion of Public Schools Finance Board in Development Plan process</u></p> <ul style="list-style-type: none"> <li>• The term ‘collaboration’ needs to be defined in the policy re: Public Schools Finance Board. Also, policy needs clarification. Why is School Board/Divisions to specified, why not Regional Health Authorities? What about private schools?</li> <li>• Development Plan Requirement #6 – why do municipalities now have to collaborate with the Public Schools Finance Board? What impact will this have on the Planning District? More info on the Public Schools Finance Board is needed.</li> <li>• Proposed policies that emphasize integration of public services and collaboration with Public Schools Finance Board in planning process are good. It is particularly vital for community planning and development to take into account aging school infrastructure, capacity issues (too much or too little), and multiple functions of schools. Consideration must be given to the adaptive re-use of schools or the redevelopment of obsolete schools sites.</li> <li>• Because school infrastructure is under a different authority than municipality, there is a significant opportunity to work cooperatively through the planning process to create synergies and efficiencies as they relate to infrastructure—both which the municipality provides and which the school division provides. Can ensure that plans are complimentary (e.g. coordination of schools, libraries, leisure facilities, etc).</li> </ul> <p><u>ISSUE: Planning Horizons</u></p> <ul style="list-style-type: none"> <li>• Development Plan Requirement #5 – it is important for the Province to remember that just because there is a lot supply, it does not mean that these lots are available for development.</li> <li>• Development Plan Requirement #5 (a and b) – For areas with sustained growth it is important to have a 30 year rolling supply of future land. This means that if a plan is required to be reviewed every 10 years, the previous supply is ‘topped up’ back to 30 years.</li> </ul>

	<ul style="list-style-type: none"> <li>• Development Plan Requirement 5(d) – there is a concern that considering lots supply on a regional basis might impact municipalities that have neighbours with ample lots available.</li> <li>• Policy 5 – commits communities to focus on outward growth, rather than redevelopment and densification. The requirement should be that a development plan identify areas for densification or redevelopment to accommodate demand; growth and designation of new lands should be put into the context of a regional growth strategy.</li> </ul> <p><u>ISSUE: Additional planning support is needed</u></p> <ul style="list-style-type: none"> <li>• Development Plan requirement #1 – requirement for visioning and public engagement in the process may benefit from some additional guidance from Province.</li> <li>• Development Plan requirement #3 – who will pay for all these studies? There is a cost to doing this type of planning. Where will the extra dollars come from?</li> <li>• Development Plan requirement #3 – It might be useful to have an easy to read table that would help communities determine what elements/studies are required for their development plan.</li> <li>• The requirements for preparing a plan are demanding and will need professional assistance. What resources are available and who will pay for them?</li> <li>• Overall, concern with the amount of studies the proposed PLUPs seem to require—i.e. Transportation Plans, Infrastructure plans and studies. Is the Province expecting municipalities to go out and hire experts to do these studies or can they be done in house?</li> <li>• Province currently does not fund enough for municipalities to have meaningful public consultations. The proposed changes to the PLUPs will add to the consultation requirements.</li> </ul> <p><u>OTHER:</u></p> <ul style="list-style-type: none"> <li>• Development Plan requirement #7 – Five year reviews seems to be too short. Possibly 8-10 year reviews instead.</li> <li>• There needs to be more public engagement and input into the development plan process.</li> <li>• There should be a requirement for consultations with neighbouring jurisdictions when preparing, amending or reviewing a development plan.</li> <li>• Suggest that development plans be based at a regional level, such as a watershed, to help internalize the negotiations between communities and provide a framework for addressing regional issues.</li> <li>• Technical studies that are required of developers to address environmental, social and infrastructure impacts should be cost shared with municipalities to ensure these studies to create a level of commitment and cooperation and a technical database for future growth.</li> </ul>
<p><b>General Development</b></p>	<p><u>ISSUE: Focus of PLUPs on Climate Change</u></p> <ul style="list-style-type: none"> <li>• Policy 1.A.1 (e) – how are municipalities supposed to address climate change? It is hypocritical of the Province to promote this yet develop Waverley West.</li> <li>• Nothing in PLUPs to prevent removal of trees. Clear-cutting is leading to significant overland flooding in areas. Trees are also a carbon sink.</li> <li>• Rural residents that are raising their own food are raising their own food are not contributing to climate change because they don't rely on having their food shipped in from abroad.</li> </ul>

- Need to provide clear terminology and definitions re: climate change in Development Plan section and throughout PLUPs. If province cannot give clear statement of provincial interest in climate change, how can it be in the PLUPs?
- Climate change is a provincial strategy and there would be a concern that these issues become mandated.
- Need more emphasis on channelling development into compact urban centers and reducing low density areas.

ISSUE: Jargon words

- LEED certification should be removed or clarified – too vague, too fuzzy.
- Provincial Interest Statement – concern that wording re: best practices being ‘mandated’ by Province could mean that LEED certification requirement will be extended beyond government-funded projects. This could be a significant impact on local development if extended.
- Policy 1.C.12 – what is the ‘long-term lifecycle’ for public costs associated with development? The lifecycle should be in the range of 80-100 years. Need to define the horizon.

ISSUE: Fringe Development

- Policy 1.B.8 – This policy is welcomed by urban centers to help ensure fringe development does not negatively affect the urban centre. Stronger wording that ensures urban municipalities can annex more land as needed would help ensure the expectation of this policy is met.
- Policy 1.B.8 – Some urban areas have a buffer zone entirely around them, but have no intention of developing in certain directions. More thought has to go into identifying buffers around urban areas. It is important for both the affected urban and rural municipalities to participate in this process.
- Policy 1.A.1 – How will the Province mitigate the financial and environmental risks associated with urban expansion into areas developed with rural residential that have been approved by the Province?
- Policy 1.C (Goal to maximize existing investments in public services) – this could be interpreted to mean that an urban centre extending its services to surrounding rural development is maximizing the investment by serving more users. This would promote fringe or leapfrog development.

OTHER

- Policy 1.D.14 – Some concern with legitimacy of Secondary Plans. Often they are just changed to suit developers after they are adopted or accepted (not all are adopted as by-laws).
- Policy 1.B.5 – Should this not also apply to resource-related uses?
- Policy 1, Section B – this whole section should be revised to include reference to protected/natural landscape designated areas to ensure that development plans consider compatibility between non resource-related uses, resource-related uses and protected/natural landscapes.
- Policy 1.D.15 – should be more prescriptive and require development plans to incorporate these concepts. Child and Youth Friendly Land Use and Transportation Guidelines should be added to the list.

<p><b>Settlement Areas</b></p>	<p><u><i>ISSUE: Increased density for Rural Residential/Cottaging</i></u></p> <ul style="list-style-type: none"> <li>• Would PLUPs now allow existing two acre rural residential lots to increase density to 15,000 sq ft lots as long as they go from septic fields to holding tanks? This could have detrimental impacts in areas of existing rural residential adjacent to urban areas. Need to clarify policy 2.C.15.</li> <li>• Transitioning onsite services to piped would be difficult because existing residents don't want to pay for it. Therefore increasing density will likely increase problems instead of solving them.</li> <li>• Policy 2.C.15 – cross reference with 6.B.11 is confusing. Need to revise.</li> <li>• Rural residential areas are less economical to service and tend to drive up the costs of providing services to a rather widely scattered population having total dependence on private automobiles.</li> <li>• The policies do nothing to curb rural residential development and in fact may be contributing to it by reducing the minimum lot size and by suggesting that piped water be extended, which usually happens in large part at public expense, thus subsidizing sprawl and exacerbating fringe development and commuting in the Capital Region.</li> <li>• Overall, the proposed PLUPs appear to promote rural residential development outside of urban areas at a higher density than is currently allowed. This could create significant long term impacts to the urban centres and make it difficult for urban centres to expand and difficult for these areas to be serviced in the long term.</li> <li>• Allowing for increased density of rural residential lots does not make sense because this form of development is car-dependent. This policy will just create more opportunities for unsustainable development.</li> </ul> <p><u><i>ISSUE: Conflicts between urban centres and surrounding rural municipalities</i></u></p> <ul style="list-style-type: none"> <li>• No further provisions for <u>how</u> an urban centre plans future expansion beyond existing boundaries - i.e. beyond policy 2.B.12 – Is there potential for more detail on urban expansion practices as part of a PLUPs 'resource guide'?</li> <li>• Perhaps there should be a 'transition area' designation for those areas adjacent to urban communities? It might make more sense for an urban centre to annex a larger portion of land around (buffer) and then be able to control development within their own jurisdiction rather than trying to control land use in the adjacent rural municipality.</li> <li>• Policy 1.B.8 - Growing urban centres have no choice but to expand their boundaries with growth, and at some point in time, all development within the vicinity of expansion will impede the orderly expansion of those urban centres. Adequate separation should be defined to include a time frame at least equal to the lifecycle of a rural residential development which would be in the range of 80-100 years.</li> <li>• Urban areas often provide services to adjacent rural residential. However, when the urban centre wants to annex that land from rural municipalities to collect taxes from this development, the rural municipalities want tax-sharing, even though the services have been provided already.</li> <li>• Policy 2.C.16 - Some like the wording that 'rural residential development should rely on nearby urban centres in the region for urban-like services'. However, it should be clarified that people from outlying areas should contribute to these as regional facilities. Otherwise it seems contradictory to the philosophy that those who benefit should pay. Rural residential areas benefit from all the services of an urban centre but often do not contribute financially to them.</li> <li>• In some cases, the owners/developers of property located on the fringe of Brandon in the</li> </ul>
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adjacent rural municipalities have come forward seeking annexation into Brandon. Often the adjacent rural municipality resists this. These same rural municipalities have over the years allowed residential development to establish outside of existing settlement areas, on agricultural land, which is contrary to the Brandon and Area Planning District development plan. The proposed PLUPs are on the right track in limiting this from happening, but they need to be less suggestive and more emphatic/restrictive. This needs to be followed by an actual review and approval mechanism to ensure orderly and justified urban expansion and fringe development is outright prohibited.

- The Province must take the position that rural residential is not allowed anywhere close to an urban centre, particularly those that have a demonstrated record of long term growth. Without a clear directive from the Province, the pressure to develop rural residential in the periphery of urban centres will continue.
- The growth of urban centres should be protected by the Province in regulation and not be subject to battles between urban centres and rural municipalities and inconsistent Municipal Board rulings.
- Development in rural areas should compliment adjacent communities.

*ISSUE: Policies promote rural depopulation*

- The draft policies should recognize that Municipalities need variety and legitimate rural uses such as rural residential, commercial, industrial and recreational support and enhance the continued vitality of rural communities.
- Rural communities need to be 'open for business' and provide opportunities for population growth. They need support from the Province rather than limitations and resistance.

*ISSUE: Policies do not restrict rural residential development*

- Although the draft policies direct development to existing urban centers, the provisions for rural residential development and the failure to include density as a factor in the definition of urban centers counteracts any attempt to promote denser, more compact development.
- There should be a moratorium on designating more rural residential areas in development plans. The long standing over-supply has contributed to scattered development patterns in many parts of the Province.
- Provincial Interest – poses a dilemma of reconciling Manitoban's ability to choose where they live with the recognition that there are social and environmental costs to those choices. Can we continue to allow individual choices that impose costs on the rest of society?
- The policies for rural residential development appear to support and even promote an increase in unsustainable, car-dependent commuter culture. Suggest a ban on further car-dependent development, both urban and rural. The test could be if people could continue to live this way if oil prices skyrocketed.
- Suggest a 'no net increase in rural residential properties' – Because many rural areas are depopulating, there should be rural residences available to newcomers to replace former residents who have left.

*OTHER:*

- Promoting higher density residential development in areas adjacent to the commercial component of downtown is intended to support the viability of the commercial sector of the downtown. However, increasing density can conflict with single family areas and result in more rental properties vs. home ownership. It would be beneficial if the policies

	<p>for Urban Centres provided some direction to help prevent these potential conflicts.</p> <ul style="list-style-type: none"> <li>• Policy 2.C.16 (d) – Concern that existing cottagers might cite this policy as a reason to object to new cottage development without background to support.</li> <li>• Provincial Interest Statement – appreciate that Province has recognized the importance of urban centers.</li> <li>• Policy 2.C.13 – what does ‘reflect rural character’ mean?</li> <li>• Policies 2.B.9, 10 and 11 are good – may have been a means to stop the new big box development in Winnipeg.</li> <li>• Policy 2.C.16 – do we really want to restrict ‘urban like services’ in cottage areas. A local store can reduce car trips for basic items.</li> </ul>
<p><b>Agriculture</b></p>	<p><u>ISSUE: Determining productivity of agricultural land</u></p> <ul style="list-style-type: none"> <li>• How will ‘viable lower class land’ be determined? On a case-by-case basis?</li> <li>• The tone of the proposed agriculture policies is that all agricultural land be protected for agricultural uses, with agricultural land being determined by mapping done decades ago, perhaps incorrectly. Concern with the policy that the applicant is responsible for providing 1:50,000 soil survey when it is likely a provincial map that incorrectly defined it as viable in the first place.</li> <li>• Land considered ‘viable’ might be more viable as some other use, rather than saving it for agriculture. Might be better off having a house in the bush than clearing the land of trees and rocks for someone to try farming on this poorer class land. Trees are being cleared only to use the land for spread acres.</li> </ul> <p><u>ISSUE: Removal of ‘retiring farmer’ subdivision provision</u></p> <ul style="list-style-type: none"> <li>• No consensus - some support for removal of provision. Some concerned with removal.</li> <li>• Want to enable succession of farm users and allow farmers to retire on land, but not to the detriment of maintaining and protecting agricultural lands for agricultural uses.</li> <li>• The proposed policies still allow for farm yard splits and subdivision in agricultural areas. There is a good balance.</li> <li>• Retired farmers should have right to cartilage, as in the definition in The Planning Act.</li> <li>• Retiring farmer should be able to subdivide their yard site without the condition to amalgamate the farm land into an existing farm.</li> <li>• While recognizing that Policy 3.A.6 (b) (ii) provides some limited opportunity for a retiring farmer to subdivide the farmstead when amalgamation is occurring, there are other circumstances when retirement will not be provided with the same privilege—for example, if a retiring farmer wants to maintain ownership of the farmland for income purposes during retirement, but subdivide of the farmstead that is no longer needed. The draft PLUPs do not allow for a subdivision of the farmstead unless the remaining farmland is amalgamated with another farm.</li> </ul> <p><u>ISSUE: Limiting subdivision in areas designated for Agriculture</u></p> <ul style="list-style-type: none"> <li>• Policy 3.A.6(c) – why only limited to single lots? Might make more sense to allow a fragmented parcel to subdivide into a number of lots. For example, why one 15 acre parcel instead of seven 2 acre parcels?</li> <li>• One subdivision per 80 acres is too restrictive.</li> </ul>

- With the existing configuration of titles issued prior to any land use controls, there are parcels of agricultural land that are less than 80 acres. How will the 1/80 acre policy be applied to subdivision applications in these cases, where they comply in all other ways?
- Policy 3.A.6 (b) (ii) – change to ‘an existing or historical farmstead site’ to allow flexibility.
- Need to modify the wording of Policy 3.A.6 to allow other land uses or less restriction to subdivide in accordance with existing policies on a case by case basis.

ISSUE: Concern with 80 acre minimum parcel size

- Policy 3.A.5 – how does this policy for minimum 80 acre parcels apply to river lots?
- Minimum 80 acre parcel size could cause more people to purchase 80 acre parcels for residential use and take farmland out of production vs. a smaller lot.

ISSUE: Language around ‘locally produced food’ and ‘greenhouse gas emissions’

- Support producers marketing their food to Manitoba consumers as “locally produced” but do not feel that this wording is relevant in the Provincial Interest Statement as related to the topic of land use planning. Instead, the Province should focus on the scarcity of prime agricultural lands for the production of food, independent of where it is consumed.
- Policy 3.A.2(f) should be removed. There are appropriate industry and provincial agencies responsible for promoting locally produced food.

OTHER:

- Concern about Manitoba Agriculture, Food & Rural Initiatives objecting to all development being proposed in rural areas.
- Concern with the language ‘promote a sustainable livestock sector’ in regards to the goal statement of Policy 3.B. The provincial interest shouldn’t be to promote livestock.
- Policy 3.A.1 – need to provide some clarity/language around those ‘rural’ areas that might not be designated for agriculture (i.e. that local plans should develop criteria for what types of uses are allowed, while still protecting agricultural operations).
- Policy 3.A.2(f) – remove. Not a land use policy.
- General support for policies that protect agricultural lands from encroachment and non-agricultural related development.
- Need a moratorium on rezoning of agricultural land, rather than stronger restrictions.
- Does the Province have a policy regarding the number of acres they would like to see kept in production or pasture that would be reflected in the land use review? What would be an acceptable amount to take out of production?
- Is there any consideration being give to a policy regarding Treaty Land Entitlement (TLE)? The transfer of land under the TLE process has the potential to take a lot of land out of agricultural production and out of control of the PLUPs. What gets developed on that land could be incompatible with agricultural use and with the PLUPs and this should be recognized.
- The PLUPs need to re-establish authority for municipalities to impose conditions on manure management, or require that manure facilities be covered and that all hog manure be injected.
- Policies 3.B.9 and 10 – want development plans to consider new technology to manage manure as a reason for allowing livestock operations to expand in areas where it

	<p>otherwise might not be environmentally sustainable.</p> <ul style="list-style-type: none"> <li>• Ecological protection should trump agricultural land protection – policies should reflect this.</li> <li>• Policy 3.B.14 – requirement for detailed soil surveys is at the cost of applicant. As the information produced through this survey will then be incorporated into the Province’s information database for provincial/public use, the wording should be changed to include a cost share between the Province and producer should a survey be required.</li> </ul>
<p><b>Natural Lands, Renewable Resources, Heritage &amp; Recreation</b></p>	<p><u>ISSUE: Determining ‘carrying capacity’ of recreational areas</u></p> <ul style="list-style-type: none"> <li>• Policy 4.C.20 – It is good to see the Province recognizing lake carrying capacity. Need clarity on how ‘carrying capacity’ is determined. More support from the Province is required to help municipalities determine the sustainability of projects and what/who determines carrying capacity and when it is reached.</li> <li>• How will Province ‘assist’? Will it be information, expertise, etc?</li> <li>• Does ‘lake carrying capacity’ reference in policy 4.C.20 include underground aquifers? Concern that groundwater might be extracted and piped to another region if someone weakly determines that there is plenty of capacity.</li> </ul> <p><u>ISSUE: Enforcing protections on identified Natural Lands</u></p> <ul style="list-style-type: none"> <li>• If natural lands fall in a road allowance, who is responsibility to ensure protection? Municipalities do not have the time or resources to enforce protection of these areas.</li> <li>• Province needs to clarify who is in charge of managing natural lands/resources (i.e. Conservation Districts, Crown, municipalities). For example, Crown lands leased for agricultural use, such as haying. These areas are often drained and not managed for water quality. The Crown is not doing its diligence to ensure the land they lease is appropriate for the use. Crown may need to start cancelling leases if pasture land is causing draining problems.</li> <li>• Ag-Crown lands has to start managing their unallocated agricultural Crown lands.</li> <li>• Issue of conservation areas designated/acquired by Non-Government Organizations – they can buy privately owned land and incrementally encroach on agricultural lands and take them out of production, without any public input. Can the PLUPs address this, or would it be some other mechanism?</li> <li>• Areas designated for wildlife management are abandoned and not managed.</li> </ul> <p><u>ISSUE: Province to create internal buffers</u></p> <ul style="list-style-type: none"> <li>• Proposed policies 4.A.2 and 4.B.11 – concern that this means Crown would buy more land to create internal buffers and result in the removal of too much privately owned land in some municipalities.</li> <li>• Will Province just ‘take’ land through Order In Council? How will this be done?</li> <li>• Crown buffers are a concern.</li> </ul> <p><u>OTHER:</u></p> <ul style="list-style-type: none"> <li>• Need clarity on proposed policy 4.A.3 – is this policy meant to protect the East Side of Lake Winnipeg? This policy seems to support the Province’s plans for Bi-pole on the West Side of Lake Winnipeg. What does ‘prohibited through legal means’ refer to? Why is this policy not in the Mineral Policy Area?</li> <li>• Recommend that PLUPs contain language clearly stating that certain lakes need to be</li> </ul>

	<p>protected if they are used for drinking water (i.e. Lake Minnewasta, Oak Lake, etc) so that local decision makers can't supersede.</p> <ul style="list-style-type: none"> <li>• Heritage resource branch has to do a better job to promote what they are trying to accomplish. Tough for a municipality to promote/enforce protection and maintenance of heritage resources when it is on private property. Heritage Resources needs to develop a better inventory.</li> <li>• Need to clarify what 'provincial assistance' refers to in these policies (i.e. policy 4.A.1 and 4.B.10). Is it timelines? Financial assistance? Also, what if there is disagreement between local authority and province? Will local authority have equal voice? Improved collaboration from the Province would help because right now there isn't much.</li> <li>• Policy 4.A.7 – grain elevators should be added to the list of significant heritage resources that should be identified and protected in development plans.</li> <li>• This policy area should be more applicable to natural lands within urban areas. Urban centers need more standards for open space.</li> <li>• Policy 4.A.1 – should include large wetland complexes/Heritage Marshes as 'heritage resources' that should be identified and protected in development plans.</li> <li>• Policy 4.B.10 – should include 'target landscapes' as 'critical and significant habitat' that should be identified and protected in development plans. Ducks Unlimited can provide the mapping for where these are located.</li> <li>• Land use policy needs to clearly reflect that new Recreational Trails need to be directed away from agricultural land and residential areas and where required, constructed with a buffer zone of vegetation or fencing to prevent conflicting and destructive land uses. There should also be an inclusion to address existing trails that have been a source of conflict.</li> </ul>
<p><b>Water</b></p>	<p><u>ISSUE: Flood Prone Areas</u></p> <ul style="list-style-type: none"> <li>• Flood prone lands – who has an inventory of these lands? Is it the Province or the local municipality? What will the identification process be?</li> <li>• The current planning process does not utilize local knowledge of flood prone areas as a way to identify potential hazards that should restrict development from occurring. For example, a proposed rural residential development next to Steinbach will be built on land that has flooded three times in the past 10 years and will likely see further flooding.</li> <li>• Will the policies on flooding and erosion require municipalities to go out and repair private erosion control structures? What legal controls will local authorities have?</li> <li>• Policy 5.C.14 (f) could provide a reasonable guideline to development plans for how setbacks should occur around water bodies. How will setback be applied to 'slumping rivers'?</li> <li>• Policy 5.C.14 (g) is good.</li> <li>• The goal for this policy area should be zero flooding of buildings.</li> <li>• Policies should not allow development in flood prone areas – they should not be open to interpretation by local jurisdictions or the Municipal Board on a case by case basis as there are too many public/provincial expenses when flooding occurs to compensate, provide emergency services, etc.</li> </ul> <p><u>ISSUE: Setbacks to protect Riparian Areas</u></p> <ul style="list-style-type: none"> <li>• The 30 metre setback would essentially eliminate development within the RM of Whitemouth. The RM is so swampy that most of it would be subject to this setback. This</li> </ul>

	<p>will severely hinder development in some municipalities.</p> <ul style="list-style-type: none"> <li>• Need more clarity on what the setback is (i.e. a development setback vs. a public reserve).</li> <li>• Who will enforce riparian protection? Municipalities do not have the resources to police people cutting down trees.</li> <li>• Is there any intention of this setback applying to water retention basins in Winnipeg? This would result in huge setbacks in residential developments with 'lake lots'.</li> <li>• Need to clarify if riparian setbacks apply to man made ponds. If they do, the City of Winnipeg has very specific criteria and these setbacks should dovetail with those of the City.</li> <li>• How do the setbacks account for rivers meandering/changing over time?</li> </ul> <p><u>ISSUE: Water quality protection</u></p> <ul style="list-style-type: none"> <li>• Policy 5.B.7 (c) – how will this be managed? For example, Winnipeg and Selkirk both dump chemicals into their water and Norway House drinks it.</li> <li>• There are no policies to address boat activity. These policies all deal with land use and don't provide municipalities with any direction on protecting drinking water reservoirs from boat traffic. Can policy 5.B.7 (c) be used to restrict or limit boating activity?</li> <li>• The Province and Crown lands are probably the biggest contributors to unmanaged wetlands.</li> </ul> <p><u>ISSUE: Watershed Management Plans</u></p> <ul style="list-style-type: none"> <li>• Does this policy area legislate Integrated Watershed Management Plans? Unless the Province is going to step up and pay for drainage works in a municipality that has 80% Crown lands, there is no point for the municipality to join a Conservation District or pay for any drainage works—it is the Province's water.</li> <li>• Policy 5.A.1 – development plans and integrated watershed management plans are to be mutually supportive. Which would take precedent?</li> <li>• Are completed watershed management plans complete available to municipalities? Will money flow along with the ideas outlined in these plans?</li> <li>• The Capital Region and surrounding municipalities should be identified as the largest contributors to water issues, not agriculture.</li> </ul> <p><u>OTHER</u></p> <ul style="list-style-type: none"> <li>• Policies on water control works – protecting wetlands often has a cost to the producer/famer – should be some form of compensation.</li> </ul>
<p><b>Infrastructure</b></p>	<p><u>ISSUE: Servicing development adjacent to urban centres</u></p> <ul style="list-style-type: none"> <li>• Policy 6.B.11 – concern that this policy will promote smaller rural residential lots adjacent to urban centres in anticipation of getting piped service and may lead to leapfrog or fringe development. Concern that this will create new servicing problems rather than fixing current.</li> <li>• Policies promoting extension of services/service-sharing will spread urban services too thinly and could lead to the demand for major infrastructure expansion and more development at the fringes of urban areas.</li> <li>• This policy will facilitate the extension of City of Winnipeg services to ex-urban centers.</li> </ul>

	<p>This is not sustainable development.</p> <p><u><i>ISSUE: Beneficiaries of development must pay for costs of development</i></u></p> <ul style="list-style-type: none"> <li>• Policy 6.B.5 – who are the beneficiaries? A definition is needed.</li> <li>• Policy 6.B.5 – should apply more broadly to all public services, not just those defined as infrastructure (i.e. should include the 'soft services' too).</li> <li>• This policy seems to conflict with proposed Policies 7.C.17, 19, 22 – require developer to pay for cost of upgrades to provincial highways. This should be beneficiaries too.</li> </ul> <p><u><i>OTHER:</i></u></p> <ul style="list-style-type: none"> <li>• This policy area should be removed – it is not land use.</li> <li>• Infrastructure and transportation planning are provincial interests and must be integrated into land use planning. But is 'encouraging' local authorities to take a responsible and proactive approach to infrastructure enough? Stronger provisions are needed.</li> <li>• General support for this policy area. Support for the Province taking this initiative.</li> <li>• Support for policy 6.B.8 that restricts unserviced development in serviced areas. It helps to meet the criteria for sustainable development.</li> <li>• Policy 6.A.1 – nice thought, but it will not likely happen in most municipalities.</li> <li>• Policy 6.A.4 – sounds like the Province is telling municipalities how to set rates.</li> <li>• Policies 6.A.3 and 4 – this will not stop municipalities from needing funding support for infrastructure – municipalities will still need grants.</li> <li>• Policy 6.C.18 – wording not clear. Will confirmation of capacity of solid waste facilities require agreements, studies, etc? this would hold up approvals for development. Does the waste facility have to be 'local' – could be regional.</li> <li>• Section 6.C – Solid Waste – there is no reference to recycling anywhere.</li> <li>• Policy 6.B.10 – this should also apply to land within the periphery of an urban centre.</li> <li>• Policy 6.B.12 – If the PLUPs state 2 acres as the minimum lot size for rural residential with disposal fields, does this mean there is no flexibility for a municipality to vary lot sizes? Putting hard numbers into a development plan removes flexibility at the zoning level.</li> <li>• 6.B.16 and 17 – will the Province use these policies as levers to encourage municipalities with excess lagoon capacity to share services with surrounding municipalities, especially considering that the Province contributes money to these facilities?</li> <li>• This policy area gets into too much detail regarding financing of infrastructure. Need specific legislation or policy on development cost charges to outline these matters that give guidance to municipalities. Let the municipalities be creative with how they implement cost charges.</li> <li>• The Province is getting too involved in municipal finances through these policies.</li> <li>• Appropriate environmental considerations should be evaluated in determining wastewater management options.</li> <li>• Are the wastewater management plans and drinking water services plans referred to in Policy Area 6 provincial plans? If so, will they be provided to municipalities?</li> <li>• Policy 6.B.14 and 15 – requirement for province to confirm water/wastewater capacity. Clarification is needed as to what is meant by 'sufficient capacity'. Does it mean having</li> </ul>
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	<p>the necessary infrastructure physically in place, or at a minimum recognizing the additional capacity that would be required to meet future development and land designations?</p> <ul style="list-style-type: none"> <li>• Based on expectation for development plans to designate land on a 25 year, long term planning horizon, it is unreasonable to expect municipalities to invest in infrastructure that would not be needed for some 15 to 25 years into the future, based on the land designation.</li> <li>• The draft PLUPs promote an integrated, inclusive process for planning and development – want to see the Province follow this same process.</li> </ul>
<p><b>Transportation</b></p>	<p><u>ISSUE: Active Transportation and Transit policies</u></p> <ul style="list-style-type: none"> <li>• Policy 7.A.5 – This is a good and welcome policy, but Manitoba Infrastructure &amp; Transportation likely wouldn't follow this. They promote separating modes of transportation vs. integrating them. For example, cyclists are currently using the shoulder along a Provincial Trunk Highway but Manitoba Infrastructure &amp; Transportation will not allow a trail to be developed next to it.</li> <li>• The transportation policies are too urban-focused—in particular those regarding walking/cycling. Rural municipalities cannot afford to build/maintain this type of infrastructure.</li> <li>• Policies need to reflect difference between active transportation and recreational trails and paths – they have different requirements and must be planned with these different needs in mind. Need distinction between recreational and commuting routes. Suggest use the term 'bikeway' in all policies instead of other terms and provide definition.</li> <li>• Policies should state that new developments must not create barriers to active transportation without adequate mitigative measures.</li> <li>• Province needs to provide more direction to the City of Winnipeg to make provisions for pedestrian pathways.</li> <li>• Policies should require the integration of active transportation rather than just 'promote' it. Overall the language needs to be stronger and more directive in this area. In particular, Policy 7.A.1; 7.A.6; 7.B.7, 8 and 9 should be reworded to use 'shall' instead of 'should'.</li> <li>• Policy 7.B.9 (h) - add 'bikeways'.</li> <li>• Policy 7.B.7 – replace 'should' with 'must'.</li> <li>• Policy 7.B.9 – reword: "To reduce reliance on the automobile and promote shifting to more sustainable forms of transportation, development plans must consider policies that support walking, cycling and transit, such as:...."</li> </ul> <p><u>ISSUE: Developer to pay for costs of highway improvements</u></p> <ul style="list-style-type: none"> <li>• Policy 7.C.17 – This policy can be unfair when development occurs incrementally. Often it is the development at the last corner of an intersection that is required to pay for all highway improvements.</li> <li>• Policy 7.C.17 - gives too broad a mechanism for the Province to collect costs for a highway under its jurisdiction. For example, a development might be proposed along a highway that already requires upgrades for existing development; but the Province will use that development application as a way to collect 100% of the costs of upgrading the highway from that single developer. It is the accumulated impact of all development, not a single developer that should pay.</li> <li>• In some instances, improvements to highways already exist and are delayed until such</li> </ul>

	<p>time as development occurs, that in turn place an undue burden on the developer to cover the costs of those improvements.</p> <p><u>OTHER</u></p> <ul style="list-style-type: none"> <li>• Policy 7.A.6 (d) – is there any procedure or policy out there to state how and when a cellular tower can get built if in a flight path of an airport? How are airports notified of such proposals if they are a long way away?</li> <li>• Policy 7.A.3 and 7.C.16 – no one knows when and where there is land set aside for highway widening. How would a local government know the plans of the Province?</li> <li>• The Province should commit to timelines on provincial transportation initiatives. For example, holding land for a future interchange and not letting anyone develop there for a long time is unfair to land owners.</li> <li>• There is no consistency in the way the Province implements highways management plans. They want them, but do not follow/acknowledge local management plans.</li> <li>• Integrating local and provincial transportation systems can be a challenge at times.</li> <li>• Overall, this policy area does not pay enough attention to rail infrastructure—in particular, short line railways that can reduce the need for trucking grain and its associated road infrastructure and fuel costs. It will take provincial and municipal actions to ensure these valuable transportation resources are not lost.</li> <li>• Policy 7.A.1 and 2 – Manitoba Infrastructure &amp; Transportation is currently unwilling to contribute funding to comprehensive land use/transportation plans – they only contribute towards transportation components. Will they step up to contribute money to development plans if a Transportation Plan is required to be integrated with development plans under the PLUPs?</li> <li>• Is the Province willing to maintain the transportation corridors they are currently responsible for?</li> <li>• Through restrictions on access to provincial highways, the Province has forced more traffic on municipal roads. This has increased the maintenance costs of these roads (i.e. main market roads). The loss of rail transportation in Manitoba has also increased the traffic on these roads.</li> <li>• Recommend adding an additional policy to the Transportation Policy Area as follows: “Development plan policies shall have regard for the Child-and Youth-Friendly Land use and Transport Planning Guidelines for Manitoba, development by the Centre for Sustainable Transportation at the University of Winnipeg”. Such recognition in the PLUPs would make Manitoba the first senior government to formally recognize the guidelines.</li> <li>• Provision of a full range of transportation options and reducing reliance on the automobile may not be feasible for smaller communities – in these cases, as they grow in size and density, those initiatives can be supported.</li> <li>• Policy 7.A.1 – (d) add ‘and expansion’ after ‘enhancement’; (e) specifically mention that the connectivity review be for all modes of transportation and all ages.</li> <li>• PLUPs should refer to Complete Streets and Child and Youth Friendly Land Use and Transportation Guidelines.</li> </ul>
<p><b>Mineral Resources</b></p>	<ul style="list-style-type: none"> <li>• Policy 8.2 – the Province should share maps to identify mineral, oil and gas resources. If municipalities had this information, they could implement best practices and environmental management related to exploration.</li> <li>• The PLUPs should incorporate a policy to give municipalities the ability to stop aggregate</li> </ul>

	<p>extraction from occurring below the waterline. There is a concern that open access to the aquifer will lead to pollution of the aquifer.</p> <ul style="list-style-type: none"> <li>• There should be timelines for mineral rights. If nothing is done with the leases, they should be cancelled.</li> <li>• Mineral development takes precedence over all other land uses in the PLUPs. This is a flaw in Canada’s regulation which should be modified. At minimum, the plans should be general so that if this approach is changed, then land use plans can recognize it.</li> </ul> <p><u>ISSUE: Questions for Mines branch:</u></p> <ul style="list-style-type: none"> <li>• What is the duty to consult First Nations in terms of mineral rights? The Mineral Resources policy does not cover this.</li> <li>• How do out of Province companies take over long term leases for large tracks of land before municipal or public use?</li> <li>• Could the Province share mineral taxes with the Municipalities for infrastructure maintenance and improvement?</li> </ul>
<p><b>Capital Region</b></p>	<p><u>ISSUE: Applicability of Capital Region policies to other areas</u></p> <ul style="list-style-type: none"> <li>• If this policy area applied to other regions, smaller cities may require more specifics than this policy area provides. For example, it would be difficult to apply this framework to the Steinbach region.</li> <li>• The principles of this policy area are applicable to all regions. However, it is important to have a section on the Capital Region given its significance to Manitoba and because there is no clear vision for the region.</li> <li>• Every municipality should be just as important as the Capital Region. This policy area should be more generalized – in particular Policy 9.1 and 3 should apply everywhere.</li> </ul> <p><u>OTHER:</u></p> <ul style="list-style-type: none"> <li>• Policy 9.4 – This policy appears to be directed to the Province and not any of the Capital Region municipalities. It sounds very political vs. ‘sound planning’ and suggests only Winnipeg may receive economic initiatives. Needs to be reworded to clarify the ‘intent’ of the policy – to recognize Winnipeg’s importance while ensuring the balance of the Province is also supported.</li> <li>• The encouragement of regional services and revenue sharing are important to the region and will only be supported if it can be shown that the partnership results in the most cost effective and efficient solution.</li> <li>• Capital Region policies have no teeth. They are simply warm and fuzzy. The Province needs to ensure that the long-term interests of the public are protected and that local interest may need to take a back seat. The Province must play a lead role in these issues because it is the decision maker when it comes to certain approval processes as well as grants provided to municipalities.</li> <li>• There should be some reference to emergency measures planning, given that it is a regional level policy.</li> <li>• This policy area should be removed. There is already legislation in The Planning Act and there are provisions in The City of Winnipeg Charter.</li> <li>• Add a policy to have local authorities coordinate their plans for a comprehensive bikeway network to priority destinations, including institutions, business centers and transit stations.</li> </ul>

	<ul style="list-style-type: none"> <li>• Planning and coordination of regional issues should not be left to local authorities.</li> </ul>
<b>Missing Topics</b>	<ul style="list-style-type: none"> <li>• Municipal energy production not covered by draft PLUPs. Biomass can have practical applications for small scale energy production for some communities experiencing planned growth. This would only work if included in the planning process.</li> <li>• The Province should adopt a Model Ordinance for Wind Energy Facilities and the PLUPs should refer to this model as the policy for municipalities to use when siting wind projects.</li> <li>• Solar and wind easements should be created by the Province and these easements should be referenced in the PLUPs.</li> </ul>
<b>Other</b>	<ul style="list-style-type: none"> <li>• Concern with requirement for 10% land dedication for schools (in The Planning Act). Don't believe that schools require 10%. Where does this rationale come from?</li> <li>• Manitoba Agriculture, Food &amp; Rural Initiatives and Manitoba Infrastructure &amp; Transportation should not be the land use planning experts. Intergovernmental Affairs planning staff should defend their right as the planning experts.</li> <li>• There may be a need to amalgamate municipalities to ensure communities are sustainable, especially within areas of declining growth. For example, big Local Urban Districts within growing Rural Municipalities would not be allowed to incorporate by the Province, yet the Province does not force small communities to amalgamate.</li> <li>• It is embarrassing that it takes longer for an Local Urban District expansion to occur than it does for an incorporated town annexation (ex. Niverville vs. Mitchell).</li> <li>• Why hasn't all the gas tax money moved from the Province to the municipalities? Is the Province sitting on gas tax money or is it coming from the federal government incrementally?</li> <li>• Conservation's policy on Harvesting Within Allowable Cut has caused significant decline in wildlife on the north side of Porcupine Mountain, affecting the last few sources of independent income and employment in the area, mainly outfitting and trapping. It is recommended that this area be reclassified as a 'disturbed land' which requires reclamation and rehabilitation and put a halt on all spraying and logging operations.</li> <li>• How will the PLUPs protect lands used for traditional lifestyles, such as trapping, from other uses such as forestry?</li> <li>• Lack of municipal or provincial monitoring and enforcement of onsite wastewater management. Cottagers/rural residences allowing holding tanks to leak instead of pumping them out and treating at municipal lagoons. As more cottage lots are developed, the situation will only worsen. Whose responsibility is it to ensure people are disposing of waste properly? Suggest that a section on enforcement be dealt with in local development plans.</li> <li>• Want a partnership between private landowners, the province and the city, for the purpose of planning for the agricultural land left in South Winnipeg (the Special Planning Area of Waverley West).</li> <li>• The draft PLUPs state they apply to all land in Manitoba. How do they impact on Neighbourhoods Alive zones?</li> <li>• The internal, professional and technical advice on this year's flooding should be put on the public record as part of the PLUP review.</li> <li>• Crown is leasing land without any consultations with municipalities who are then responsible for putting in roads and drainage to this land. Consultation is needed.</li> <li>• Crown should not be exempt from paying taxes on Crown lands within a municipality.</li> </ul>

	<ul style="list-style-type: none"><li>• The Crown should open up more Crown land for sale and then be tax viable on these lands.</li><li>• Clarification from Crown Lands requested: If a municipality wants to purchase Crown lands for development, is there a requirement that a municipality must give up land for Crown purposes (like a swap)?</li></ul>
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