

October 4, 2013

Dear fellow members of the Community Design Advisory Committee:

As agreed, we, a writing subcommittee, were charged by you, the committee as a whole, with the task of pulling together the committee's opinions and advice on the RP+5 process to date, and on the results which have now materialized as Draft 3.0 of the revised Regional Plan. What follows is a draft letter we have prepared for your review and addressed to Regional Council through the Community Planning and Economic Development Committee.

Discussion of this letter will top the agenda at our October 9th meeting. We look forward to seeing you there.

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October 9th, 2013

**A letter from HRM's Community Design Advisory Committee to
the Community Planning and Economic Development Committee,
a standing committee of Regional Council.**

PREAMBLE

On Wednesday, October 2nd Planning Staff presented to our committee their third draft of a revised version of HRM's Regional Plan. We have reviewed this draft in detail and, per our Terms of Reference, offer Council through the standing committee the following comments and recommendations:

Background

The **Community Design Advisory Committee (CDAC)** was established by Council to advise the Community Planning and Economic Development Standing Committee (CPED) on the development and implementation of two initiatives of regional significance:

1. The Regional Plan 5 Year Review (RP+5), and
2. The Centre Plan project

This letter constitutes CDAC's comments on the first of these initiatives, RP+5.

CDAC'S role

In addition to making recommendations to staff, CDAC's Terms of Reference define us as a key communication and working link between Council and the community. Through CPED we are to advise council on the delivery of the public participation program, report on the initiative's overall progress, and "review and make recommendations to CPED on any proposed amendments or additions to the Regional Plan."

COMMENTS

What follows are CDAC's *Assessment* of the progress and outcomes of the RP+5 process to date followed by two *Recommendations*.

Assessment

The scope of changes to the regional plan is significant. Many policies have been changed, and many new ones developed. Indeed, it could be said CDAC is being asked to rescind the old plan and adopt a new one with no clear estimation of the impact of the proposed changes, who will be affected and how.

Few of the changes are those sought by the public nor by the CDAC. Despite an unprecedented number of public consultations, backed up by hundreds of pages of written correspondence representing thousands of volunteer hours, RP+5 does not reflect this substantive input.

Regarding the public participation plan, the CDAC feels it was not sufficiently consulted and was never provided an opportunity to brief CPED on its progress.

It is the opinion of the CDAC that the proposed RP+5 draft:

- will not meet the identified growth targets irrespective of what measures may be undertaken as part of the subsequent Center Plan process;
- does not clearly articulate how strategies relating to mobility and land use planning are linked and coordinated to ensure the sustainable development objectives of the Municipality;
- does not appropriately account for the findings of the Altus "Study of Commercial Taxes as a Driver for Business Location Decisions", Stantec's "Benefits of Alternate Growth Scenarios," Gardner Pinfold's "Economic Impacts of Growth Related Infrastructure Costs," nor does it address the impacts and costs of our current mobility patterns. Indeed linkage between most research and the final report is not evident.
- does not adequately represent the advice received from CDAC or the community at large through the consultation process with respect to the policy intent of the plan revisions;
- does not contain measurement, monitoring and accountability provisions sufficient to ensure that prescribed growth targets are met.
- does not include sufficient evidence of why certain new policies or policy changes were required and provides no indication of expected impact of policy proposals.

In addition, it is the Committee's view that the current draft of RP+5 is not consistent with several principles of the regional plan. To be specific:

- The complex policy framework being outlined guarantees a high degree of unpredictability of outcomes and costs. Clarity and simplicity, called for both by developers and citizens, is lacking. This is inconsistent with the plan's first principle "Provide a framework which leads to predictable, fair, cost-effective and timely decision-making."
- The Plan as outlined adds time and cost to the development process and lacks a direct connection to HRM's economic strategy, which is inconsistent with the following principle: "Support development patterns that promote a vigorous regional economy."
- It is the feeling of the committee that the regional plan revisions also do not support a second principle: "Support the Regional Centre as the focus for economic, cultural and residential activities."
- Lastly, they do not support a third principle: "Manage development to make the most effective use of land, energy, infrastructure, public services and facilities, and foster a healthy lifestyle."

The Committee strongly feels that CPED and Council should make decisions on new policy based on two criteria:

1. A clear understanding of the need for a specific policy and the impact that policy will have on the community.

2. Clear evidence that the best advice from the community, the Committee and available research has been incorporated into the document.

The RP+5 processes and the document do not provide sufficient evidence of the need for specific policy changes or the impact of those changes. The RP+5 processes and the document do not sufficiently reflect the advice of the community, CDAC or the available research. For this reason, the Community Design Advisory Committee can not recommend approval of RP+5 at this time.

Recommendations

It is not within CDAC's purview to negotiate detailed rewordings of the draft Plan nor to set on Council's or CPED's behalf critical policy directions. We leave those tasks to those empowered to make such decisions. We do, however, make the following two recommendations:

- **We suggest to council that an external consultant be engaged to finalize RP+5 based on consultation, committee recommendations, existing research and best practice in community planning, and**
- **We recommend proceeding as soon as possible with our review of the Regional Centre Plan as described in our Terms of Reference.**