

Response to Written Public Submissions (Received July 6-19, 2013)* Package 1**

*Refer to Submissions Packages 3 and 4: <http://www.halifax.ca/planhrm/Phase3Comments.html>

**A supplementary package, containing the remainder of the submissions, will be tabled with the CDAC on August 8/13

POLICY AREA - GREENBELTING				
	SUBMISSION REFERENCE #	COMMUNITY FEEDBACK (The issues and comments received have been summarized below. Please refer to full submission for more detail)	STAFF RESPONSE	CDAC DIRECTION
	3.3, 3.4, 3.17, 3.23, 3.31, 3.52, 3.57, 3.64, 3.78, 3.81, 4.24, 4.31, 4.38, 4.40, 4.41	Term is vague and needs further clarification and dialogue.	The term is defined in Draft 3 and further dialogue will take place through the Greenbelting and Public Spaces (GPS) Priorities Plan.	
	4.10	No new subdivision beyond urban service area. (Cross-reference with Growth Management Policy Area)	Staff believes the appropriate approach is to apply strong community design principles to rural growth, not eliminate it.	
	3.23, 4.24	Under policy E12 “may” consider should be changed to “shall” consider, concerning the Greenbelting and Public Spaces (GPS) Priorities Plan.	The Regional Plan commits Council to prepare the GPS, but does not commit to specific elements. A detailed project charter for the GPS will be brought to Council to initiate the process following adoption of the revised Regional Plan.	
	4.10	Halifax Water Commission permits forest harvesting in watershed lands.	This is provincial jurisdiction and is a controlled stewardship practice.	
	4.30	Urban settlement designation within the Regional Plan be comprehensively applied to contain development. (Cross-reference with Growth Management Policy Area)	The Urban Settlement Designation is applied as HRM’s urban Growth boundary.	
	4.30	Work with NSDR concerning watershed protection.	Agreed	
	4.30	Add a policy supporting sustainable suburban and rural community design.	Amend Chapter 3 to include sustainability in community design criteria. (moved under “Implementation” Policy Area)	
	4.30	Collaborate with Public Health to develop a	Agreed	

		community assessment tool and a rural active development assessment tool.	(moved under “Healthy Communities” Policy Area)	
	3.21	Maintain the Urban Reserve Designation on the Purcell’s Cove Backlands until such time as areas to be protected as greenbelt are identified.	Agreed. Further dialogue can take place through the GPS.	

POLICY AREA - GROWTH CENTRES				
	SUBMISSION REFERENCE #	COMMUNITY FEEDBACK (The issues and comments received have been summarized below. Please refer to full submission for more detail)	STAFF RESPONSE	CDAC DIRECTION
	3.73	Expand Porter’s Lake Growth Centre Boundary	Policy may be established to allow consideration of the expansion of this centre at a later time through a secondary planning process if it is determined that it is not feasible to allow future development in the centre through piped services and additional area for development is needed to accommodate future growth.	
	3.1, 3.6, 3.13	Don’t eliminate Morris Lake as a potential growth centre.	Included in policy intent for growth in the Morris Lake / Eastern Passage area contingent on construction of Caldwell connector.	
	3.13	Do not allow residential development on the Bedford Waterfront.	A community vision statement has been approved by Council for the Bedford Waterfront. This includes a mixed use community.	
	4.7A	Include Bedford South as a growth centre.	Agreed.	
	3.16	Flexibility for redevelopment and intensification should be an important factor when policies are proposed for Rural District Growth Centres	Community planning processes will establish Growth Centre policy and staff believe sufficient flexibility exists within the Regional Plan. (S-8 and S-9)	

3.23	Dartmouth Crossing, because of its proximity to an industrial park, should be removed as a suburban District Growth Centre	Agreed, however it should be pointed out that the Dartmouth MPS will include provisions to allow residential development on the private land holdings of Dartmouth Crossings.	
3.23	Port Wallace should be removed from the list of suburban local Growth Centres	Regional Council has directed that a community plan be prepared following completion of a water shed study.	
	Policy S-33 is very vague regarding allowing infill development	This policy is to provide general guidance for the preparation of or amendment to secondary planning strategies and land use by-laws, as well as guide the consideration of amendments to the Regional Subdivision By-law. Therefore, it does not have to be specific, and in fact it shouldn't be, because the context varies across the various secondary planning areas. In some areas, it may be difficult or even impossible to densify due to capacity issues.	
3.80	Language referencing three approved master planned communities of should be reinstated.	Agreed.	
3.80	Staff must make the commitment to revisit setbacks which delay or prevent development in areas where the plan encourages growth (e.g. Shearwater Lands).	Agreed. <i>Draft 3 will reflect this change. Technical discussions have revealed a collector road can be constructed, however, DND has not granted permission to cross the lands. (Aug 6/13)</i>	
3.78	Encourage denser, mixed use, people centered neighborhoods. Concentrate growth in growth centres	Agreed. <i>This is a fundamental objective of the Regional Plan (see Objectives, Section 3.1) (Aug 6/13)</i>	
3.53, 3.57, 3.70, 3.57	Concerns expressed regarding impacts of development on Bedford Waterfront	These issues will be addressed through a secondary planning process supported by a detailed investigation of transportation impacts.	

	3.3, 3.4, 3.17, 3.31, 3.52, 3.57, 3.81	Many aspects of the Plan need more consideration including growth strategy, greenbelting, transportation, community engagement, water buffer zones.	Issues raised will be addressed through priorities Plans and Community Plans.	
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POLICY AREA - GROWTH MANAGEMENT				
	SUBMISSION REFERENCE #	COMMUNITY FEEDBACK (The issues and comments received have been summarized below. Please refer to full submission for more detail)	STAFF RESPONSE	CDAC DIRECTION
	3.23, 4.8	Place a holding zone on Urban Reserve Lands	The current zoning serves as a holding zone until a secondary planning strategy is undertaken after the life of the Regional Plan in 2031.	
	3.13, 3.80	Number of available lots is misleading.	Addressed in 2010 staff report and will be summarized for RP+5 staff report.	
	3.13, 3.80	Do not use regulations to force development in region. Too much emphasis on Regional Centre vs. suburbs.	The Regional Plan identifies Regional Centre and Suburban growth as good growth according to prescribed design principles. Incentives for Regional Centre Growth will be included in the Regional Centre Plan.	
	3.1	Request to exempt certain properties from requirements to undertake secondary planning.	Secondary Planning criteria are essential to implementation of the Regional Plan.	
	3.1, 3.80	Should be able to include riparian buffers and other open space in parkland dedication requirements.	The revised plan states that parkland dedication is reduced from 10% to 5% in Classic Conservation Developments (S-18).	

	3.80	Where lands are designated Open Space in the context of an overall master plans or subdivision approval, the lands must be credited against the developer`s overall parkland requirement where there is an intention to see these lands preserved for public ownership.	The plan speaks to lands set aside for conservation for environmental protection remaining in private hands and under the stewardship of the local community. They may be used for passive recreation or community agriculture, but also as disposal beds for in-ground sewage treatment. Parkland dedicated through the subdivision process is reduced from 10 percent to 5 percent for Classic Conservation Developments. This provision will be extended to all developments within defined growth centres.	
	3.2, 3.78, 4.7, 4.25	Development charges are too lenient to discourage growth outside the Regional Centre	The HRM Charter only permits charges associated with infrastructure costs.	
	4.10	No new subdivision beyond urban service area. (Cross-reference with Greenbelting Policy Area)	Staff believes the appropriate approach is to apply strong community design principles to rural growth, not eliminate it.	
	4.30	Urban settlement designation within the Regional Plan be comprehensively applied to contain development. (Cross-reference with Greenbelting Policy Area)	The Urban Settlement Designation is applied as HRM`s urban Growth boundary.	

POLICY AREA – GROWTH TARGETS			
SUBMISSION REFERENCE #	COMMUNITY FEEDBACK (The issues and comments received have been summarized below. Please refer to full submission for more detail)	STAFF RESPONSE	CDAC DIRECTION
3.6, 3.8, 3.13	Maintain current growth targets	Agreed. Draft 3 will indicate that at least 25% of growth will be targeted to the Regional Centre and at least 75% of growth will be targeted to the Urban Settlement Designation. The revised draft also calls for annual monitoring/reporting of growth relative to the targets.	
	Ensure growth targets are met.	HRM is committed to ongoing monitoring of growth and regular reviews of the Regional Plan.	
3.23	Consider strengthening the Regional Centre target after year 10 of the Plan.	The growth targets were meant to be achieved over the life of the Plan. The next 5 years will be a more critical test in determining the success of plan. A revised approach after year 10 may be warranted.	
3.11, 3.23, 3.68	The Plan should include commercial targets as well as residential ones.	This idea should be explored through the Centre Plan. HRM’s most recent research indicates encouraging residential growth is the most useful strategy to promote commercial growth. The Plan restricts new office development in the Burnside expansion area.	
4.10	Consider denying building permits for development in areas where growth targets have been exceeded.	The Plan speaks to the use of incentives to promote growth in the Regional Centre, not punitive measures in other parts of HRM.	

	<p>3.3, 3.4, 3.7, 3.9, 3.10, 3.15, 3.17, 3.18, 3.24, 3.30, 3.31, 3.42, 3.43, 3.45, 3.50, 3.51, 3.52, 3.56, 3.57, 3.59, 3.62, 3.64, 3.78, 3.81, 3.83, 4.7, 4.7A, 4.14, 4.24, 4.25, 4.41</p>	<p>Support Scenario B in Stantec Study</p>	<p>Maintain existing 25% / 50% / 25% growth targets. Locating 50% of new dwelling units in the Regional Centre would represent more than three-fold increase over the current level of residential development there. Stantec found that doing so would require a high proportion of the regional's residents in multiple-unit buildings than was suggested by the market projections they adopted for their work.</p> <p>To find the land on which to locate these additional units, the consultant furthermore had to assume that a policy would be adopted to allow the addition of a secondary dwelling unit to all single unit houses in the Regional Centre. Such a change would of course require the consultation of the citizens of HRM before it could be undertaken.</p> <p>The Centre Plan process will engage residents in a dialogue on where and how growth should happen in the Regional Centre. While meeting growth targets is important, attention must also be paid to the rate of change, heritage protection, public realm improvements and the overall quality of new development. The 2011 Census indicated that while population on Peninsula is increasing, there may be a real opportunity to attract more growth and population to Dartmouth.</p>	
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POLICY AREA – URBAN RESERVE DESIGNATION				
	SUBMISSION REFERENCE #	COMMUNITY FEEDBACK (The issues and comments received have been summarized below. Please refer to full submission for more detail)	STAFF RESPONSE	CDAC DIRECTION
	3.13	Change designation on lands off Purcell’s Cove Rd to Urban Settlement and rezone to Residential Development District.	This area presents a strong opportunity for growth in the future, however, ample lands for serviced development are currently available in the Western Region. Council directed that the Purcell’s Cove Road Servicing Steering Committee be disbanded and that consulting study be tabled. No direction was given to proceed any further.	
	3.13, 3.80	Urban Reserve designation is overly restrictive.	Zoning is restrictive to prevent premature development, however, lands in urban reserve will be considered for oversizing of infrastructure so their future development rights for serviced development are protected.	
	3.1	Add lands to urban reserve.	Not recommended as this would potentially require infrastructure oversizing which may not be appropriate.	
	3.6	New policy should not apply to application in process.	New policy in draft proposes to allow completed DA applications to be considered in accordance with the policies offered at the time of application.	
	3.8	Approved Master Plans should continue to be recognized in Regional Plan.	Agreed. They will be referenced in Draft 3.	

3.1	Request to add various Armco Lands to Urban Reserve.	<ol style="list-style-type: none"> 1. Bissett Lake Road – PID number not identified by landowner (in submission). 2. Vincent MacDonald lands – These lands enveloped in rural commuter designation and should not be considered in isolation. Could be considered if secondary planning strategy is initiated for Morris Lake North/Eastern Passage. 3. Green Acres – This adjacent to the Kidston Lake Urban Reserve and currently Open Space and Natural Resource. Could be considered during future community planning. 	
3.80	Language referencing development capability for the Urban Reserve under policy IM-18 (now G 16) should be retained.	Agreed, although language is added to clarify this Policy is to be applied on a limited scale.	
3.80	The current restrictions on development in the Urban Reserve are too stringent in light of the fact that there is no guarantee that the seven locations will ever receive municipal services.	A new policy will be added to clarify that any time development takes place in the vicinity of an urban reserve areas, HRM shall consider oversizing infrastructure to ensure the potential for development in the urban reserve is maintained.	
3.2, 3.7, 3.9, 3.10, 3.15, 3.18, 3.21, 3.22, 3.24, 3.30, 3.37, 3.31, 3.57,3.81, 3.45, 3.46, 3.50, 3.51, 3.52, 3.56, 3.42, 3.59, 3.62, 3.83, 3.78, 3.66, 3.3, 3.4, 4.7, 4.14, 4.15, 4.25	Preserve Purcell’s Cove backlands and encourage development along the Herring Cove Road corridor.	Purcell’s Cove Backlands have been identified as urban reserve and this status should be maintained to accommodate future growth.	

POLICY AREA – POLICY G-16				
	SUBMISSION REFERENCE #	COMMUNITY FEEDBACK (The issues and comments received have been summarized below. Please refer to full submission for more detail)	STAFF RESPONSE	CDAC DIRECTION
	3.2, 3.3, 3.4, 3.7, 3.9, 3.10, 3.15, 3.17, 3.18, 3.21, 3.24, 3.30, 3.31, 3.37, 3.42, 3.44, 3.45, 3.46, 3.50, 3.51, 3.52, 3.56, 3.57, 3.59, 3.62, 3.66, 3.78, 3.81, 3.83, 4.2, 4.7, 4.14, 4.15, 4.24, 4.25, 4.31, 4.41	Remove Policy G-16	Policy G-16 is necessary to provide limited flexibility on the designation as they are not mapped along specific property lines. The policy will change to clarify the intent that this flexibility is limited in scale.	

POLICY AREA – SERVICING				
	SUBMISSION REFERENCE #	COMMUNITY FEEDBACK (The issues and comments received have been summarized below. Please refer to full submission for more detail)	STAFF RESPONSE	CDAC DIRECTION
	4.34	Mandate Wastewater Management Districts (Policies SU-19 and SU-20)	The policy has to remain flexible to allow the Municipality to investigate the feasibility of establishing Wastewater Management Districts. WMDs may not be feasible in all areas as the cost of remediation could exceed the cost of the new infrastructure required to provide service.	

4.34	Mandate septic tanks be pumped out on a 3-year cycle.	To protect public health and the environment, HRM will investigate a means to ensure on-site sewage disposal systems are maintained. Policy will be added to Draft 3 to enable the consideration of the adoption of an on-site sewage disposal system by-law. It is recognized that the current industry standard for the maintenance of on-site septic systems is to have the systems pumped once every three years. Specifications as such should be placed in the future by-law and not in policy as industry standards may change.	
4.34	Apply a change to septic system owners so that the municipality could replace malfunctioning systems.	A charge could be established under a Waste Water Management By-Law.	
4.33	A number of specific suggestions are made concerning storm-water management and topsoil grading.	Policies in Section 8.5 adequately describe the role of HRM is storm-water management.	
4.28	Remove policies SU-15 and G16, as SU-6 allows for minor adjustments to sewer and water.	SU15 is required as it applies specifically to Water Service only areas and as such is not related to SU-6.	
3.1	Clarify implications to service boundary extensions of directing and focus new growth areas where infrastructure and services are already available.	Intent is to reduce costs to HRM and defer need to extend service boundary.	
3.1	Clarify conditions under which lands in Middle Sackville which are in the Urban Service Area can be developed.	Staff believe current wording addresses infrastructure needs relative to potential development.	
??	Replace “may” consider with “shall consider” in Policy SU-11 concerning daylighting of buried streams.	The use of “may” protects HRM’s legal position without undermining the intent to carry out daylighting where appropriate.	
4.10	Encourage home owners to reduce storm water volume with financial incentives.	Policy SU-13 states HRM shall support Halifax Water to incent storm water retention.	

3.23	SU-1 is a good provision but it is unclear whether this happens with the adoption of the Plan, or sometime in the future.	SU-6 mandates that growth related charges be in effect before a service boundary is expanded.	
3.23	SU-2 is not strong enough. Remove the word “consider”.	The intent to create growth charges is clear. The policy cannot commit council to a future action to establish a by law, as this must follow a public hearing.	
3.23	Statements concerning transfer of administration of water services to Halifax Water need clarification.	By transferring the ownership, operation and administration of municipal waste-water and storm-water facilities to Halifax Water, it ensured that a public utility could focus its full attention on maintaining and upgrading the entire system. Under general HRM management, the piped system just became one of the many responsibilities of the Municipality and therefore had to compete for a portion of the property tax revenues for maintenance and upgrades.	

POLICY AREA – RURAL SUBDIVISION			
SUBMISSION REFERENCE #	COMMUNITY FEEDBACK (The issues and comments received have been summarized below. Please refer to full submission for more detail)	STAFF RESPONSE	CDAC DIRECTION
3.73, 3.80	Proposed densities too restrictive potentially increasing the cost of housing	Revise Draft 3 will include a reduced calculation of open space where environmental constraints exceed required retention of open space	
3.73	Increase number of units provided on private driveways	Allow up to 20 units on private driveways. DA will include phasing requirements to provide for rational lot yield regulation.	
3.80	Density in Rural Growth Centres too restrictive	Density may be varied through secondary process.	

3.77	Secondary plans need to be completed in a timely manner	The staff cover report will address the need for Secondary Plans and required resources.	
3.77	Reform the Development Agreement process.	Development design criteria needs to be addressed at the Secondary Planning stage along with appropriate implementation mechanisms.	
3.77	A Coastal Policy Protocol under Chapter 3 is required.	This will be addressed within the context of HRM's mandate through the GPS.	
3.77	Clearly state fish farming, wind farm and solar farm policies.	HRM recently adopted wind turbine policies. Solar farm issues will be addressed through the Community Energy Plan Review. Fish farming is a provincial responsibility.	
3.77	More stringent development regulations for islands.	Agreed. Staff will add additional development criteria including requirement for permission for offsite infrastructure.	
3.77	Limit commercial development between growth centres.	Draft 3 will include a new policy that when secondary plans are being prepared or renewed, consideration be given to limit scale of commercial growth between centres.	
3.8	Exempt family lands granted through inheritance from regular HRM subdivision rates.	This would create unintended consequences including uncertainty over property title.	
4.28	Eliminate rural conservation development between centres.	The Plan provides incentives for growth in centres and restricts development between centre with caps. Staff believe emphasis should be placed on secondary planning strategies to confirm interim centre boundaries.	
3.1, 3.80	Placing restrictions of 100 or 30 lots on developments between growth centres are not justified.	These numbers were selected based on maintaining a reasonable opportunity to develop relative to the costs of providing road infrastructure while maintaining environmental protection. Caps are important to maintaining the focus of growth in identified growth centres.	

	3.80	An increase in density should be given to any Open Space Development in the Classic form, beyond the 1 unit per 4000 sq. m. as an incentive to move from the Hybrid Design.	The maximum density of 1 unit per 4000 sq. metres for a Classic Open Space Design Development within Rural Growth Centres was recommended to ensure that development is environmentally sustainable and compatible with the rural character of the surrounding area. Increased densities for alternative housing forms such as multiple unit dwellings and townhouses may be considered for selected sites through a secondary planning process.	
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POLICY AREA – RIPARIAN BUFFERS				
	SUBMISSION REFERENCE #	COMMUNITY FEEDBACK (The issues and comments received have been summarized below. Please refer to full submission for more detail)	STAFF RESPONSE	CDAC DIRECTION
	3.1	Delete Policy E-16.	Disagree. HRM is permitted under its Charter to adopt policy concerning environmental protection and setback from water courses.	
	4.10	Halifax Harbour, including Bedford Basin, should not be exempt from watercourse buffers.	Watercourse buffers are inconsistent within the context of a working harbour front.	
	4.10	Buffers should apply to all developments whether “By Right” or through Development Agreements.	In the 2006 plan and revised plan, watercourse buffer regulations apply to developments including “by-right”.	
	4.10	No relaxation of requirements for lots in existence prior to approval of 2006 plan.	The current relaxations are limited in scope. Lot owners are still required to adequately flood proof and meet the 2.5 metre elevation for residential use.	
	4.28	Establish a 30-metre watercourse setback.	20 metres is a minimum standard which can be increased through secondary planning.	

4.30	Allowing “small scale accessory buildings” in riparian buffers require further definition.	This issue is clarified through Secondary Plans and Land Use Bylaws. Policy E-16 has been revised to indicate inclusion of accessory buildings is discretionary.	
3.44, 4.31, 3.81, 3.3, 3.17, 3.31, 3.52	Increase setbacks to 30 meters.	20 metre setbacks are a minimum and can be increased through secondary planning processes.	

POLICY AREA – COASTAL INUNDATION			
SUBMISSION REFERENCE #	COMMUNITY FEEDBACK (The issues and comments received have been summarized below. Please refer to full submission for more detail)	STAFF RESPONSE	CDAC DIRECTION
4.10	Complete a North West Arm Plan.	Many issues related to N.W. Arm have been addressed through the Halifax MPS review (i.e. setbacks, built form and infilling). Other issues may be addressed as part of Centre Plan.	
4.10	Undertake detailed secondary planning for coastal areas of Bedford Waterfront, Cow Bay and Eastern Passage.	Secondary planning for the Bedford Waterfront is underway. Amendments to the Cow Bay/Eastern Passage Community Plan increased coastal setback to as much as 60 metres in 1998. Further change to protect coastal areas will be reviewed when the IPCC AR5 Report is released later this year. (See response below).	
4.24	Revise Sea level elevation to a minimum of 2.5 metres with provisions. Enact further change subject to new information.	Agreed. (See response below)	

	4.24	The 2.5 metre elevation above ordinary high water mark should be increased to 4 metres. That policy is not adequate but it's certainly better than the proposed revision.	Draft 3 will leave the policy unchanged from RMPS 2006 and add a preamble committing Council to review and revise the 2.5 m elevation setback in light of the upcoming IPCC (Intergovernmental Panel on Climate Change) AR5 (Fifth Assessment Report) which will be released later this year, with new sea level rise estimates.	
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POLICY AREA – WETLANDS				
	SUBMISSION REFERENCE #	COMMUNITY FEEDBACK (The issues and comments received have been summarized below. Please refer to full submission for more detail)	STAFF RESPONSE	CDAC DIRECTION
	3.1, 3.80	Delete Policy E-15 referencing wetland schedule. Policy E 15 concerning wetland protection is too restrictive. A mechanism should be available to allow alteration of wetlands of any size as is permitted by the province	<p>This policy prohibits development on wetlands of 2000 square metres or greater. The provincial government is currently assessing more comprehensive definition of wetlands to include smaller water bodies which are interconnected to create a wetlands complex. This will be further investigated through the Greenbelting and Public Spaces (GPS) Priorities Plan. Staff feel that as more information becomes available it is likely that future policy direction would be more restrictive not less in order to provide appropriate environmental protection requirements.</p> <p>However, staff will amend the policy to clarify that public infrastructure may be constructed in a wetland.</p>	

4.10 4.24	HRM's Wetland Policy should apply to wetlands as small as 100 square metres.	(See paragraph one in the first response listed under the Wetlands heading)	
4.24	The Wetlands Protection section should establish protection for all wetlands 2.0 ha and larger (essentially E-15, but HRM must ensure that the wetland schedule is complete).	(See paragraph one in the first response listed under the Wetlands heading)	
4.24	Policy should require the identification and delineation of all wetlands 0.1 ha and larger on development approval applications, and to follow the required DoE permitting requirements for the wetlands 0.1 ha to just under 2.0 ha.	(See paragraph one in the first response listed under the Wetlands heading)	
4.24	A minimum 20 metre riparian buffer should be established around certified, delineated edge of retained wetlands.	(See paragraph one in the first response listed under the Wetlands heading)	
4.24	Wetland complexes of multiple small, hydrologically or physiographically linked wetlands must also be included under the 2.0 ha protection policy.	(See paragraph one in the first response listed under the Wetlands heading)	

POLICY AREA – REGIONAL PARKS				
	SUBMISSION REFERENCE #	COMMUNITY FEEDBACK (The issues and comments received have been summarized below. Please refer to full submission for more detail)	STAFF RESPONSE	CDAC DIRECTION
	4.10	Acquire necessary lands for Blue Mountain Birch Cove Park.	Council has directed that a facilitated negotiation take place towards acquiring lands.	

POLICY AREA – HOUSING AFFORDABILITY				
	SUBMISSION REFERENCE #	COMMUNITY FEEDBACK (The issues and comments received have been summarized below. Please refer to full submission for more detail)	STAFF RESPONSE	CDAC DIRECTION
	3.80	Add new principle “that the municipality will strive to ensure that regulations regarding future do not unduly impact housing affordability throughout the municipality”.	Agreed.	
	4.3	Need a stronger policy to promote neighborhood resiliency.	Staff believe Section 3.5 addresses this adequately.	
	4.5	Need to recognize “for-profit” contribution to housing affordability.	Agreed. Revisions will be made to Section 3.5.	
	4.5	Under Policy S-33 insert statement from earlier draft - “the number of residents should be compatible with prevailing land use”.	The policy will be changed to reflect the need to ensure the scale of dwelling reflects the neighbourhood.	
	3.23	S-37 (pg. 56) should be made much more specific – either actually waiving affordable housing fees, or, if legislative changes are required, specifying that HRM will request those.	It is not a simple matter as just waiving fees. Questions like what projects should qualify, to what extent fees should be waived, what type of fees should be waived, and what will be the financial impact on the Municipality if fees are waived should first be determined.	

POLICY AREA – FOOD SECURITY				
	SUBMISSION REFERENCE #	COMMUNITY FEEDBACK (The issues and comments received have been summarized below. Please refer to full submission for more detail)	STAFF RESPONSE	CDAC DIRECTION
	4.10	HRM should support development of a regional food system that supports local farmers.	Food security has been identified as an objective in Chapter 3 and also identified for consideration in Secondary Planning in Draft 3.	

	3.29	Control urban livestock in urban areas.	The specifics of food security will be addressed in secondary planning.	
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POLICY AREA – MOBILITY				
	SUBMISSION REFERENCE #	COMMUNITY FEEDBACK (The issues and comments received have been summarized below. Please refer to full submission for more detail)	STAFF RESPONSE	CDAC DIRECTION
	3.44, 3.64, 4.30, 4.38	Active transportation plan is disappointing.	Draft 2 includes reference to Active Transportation Functional Plan but Draft 3 will include an actual list.	
	4.28, 4.30	Define road networks hierarchy based on community desires.	The approach to TDM is illustrated on Figure 4.1 Consideration is first given to AT and transit and after that they road networks expansion is considered. Draft 3 includes a policy requiring community consultation prior to any road network expansion identified by the Plan.	
	4.38, 4.30	Embed a requirement for pedestrian oriented development in plan policy.	Pedestrian oriented development is included in community planning criteria in Chapter 3. Chapter 4 objectives also reference this topic.	
	4.30	State commitment to a complete streets policy.	This is referenced in the Chapter on objectives and policy T-14.	
	3.6, 3.1, 3.8	Emphasize importance of completing Mount Hope Ave to Caldwell Road connector.	Agreed. See project rationale Table 4.1 in Draft 3.	

	3.44, 4.28, 4.42	Remove Bayers Rd and Third Harbour Bridge.	The plan prioritizes sustainable commuting modes and sets targets for shifting demand away from cars. While increasing demand for vehicle capacity is limited, it is not expected to be completely eliminated. The Road Network Priority Plan identifies projects needed to accommodate increasing vehicle demand while maintaining existing congestion levels. Alternatively, a policy could be adopted to forego adding capacity for increasing demand with the outcome being increasing congestion and delay.	
	3.23	Chapter 4: Transportation should be renamed “Mobility”.	Proposed change to add “mobility” to the Chapter title.	
	3.23, 3.44	Generally speaking, this chapter provides specifics around road networks and is very light on specifics to do with active transportation and transit. As a result, it looks like a chapter on roads only.	Active transportation and transit are discussed in some detail under Chapter 4. Moreover, active transportation and transit have their own respective plans, which are referenced in Chapter 4. These plans are quite detailed and are reviewed on a regular basis. A list of Active Transportation projects will be included in Draft 3. The new transit service is the basis for establishing transit priorities.	
	3.23	This chapter should create a priority plan for an integrated mobility plan, with public input. This could be assigned to the Strategic Joint Regional Transportation Planning Committee. As the chief ongoing complaint about modes of transportation is the lack of coordination, the creation of such a plan would be a bold move.	Reference to the SJRTPC is being removed. The issues are addressed in the Halifax TDM Functional Plan.	

3.23	Bayers Road/Highway 102 widening should be removed from the plan (pg. 61). It implies that it is proceeding. The proponents of the project will point to its inclusion in this plan as signifying approval.	All major road network expansions will be the subject of a consultation process before proceeding.	
3.23	The harbour crossing should be removed from the Plan	The Plan anticipates that shifting demand towards transit and active transportation will eliminate the need for a third harbour crossing during the life of the Plan. It is included as a future potential project so that land use planning measures can be taken, if needed to preserve the opportunity to consider implementation of this project in the longer term future.	
3.23	The road hierarchy changes identified in map 8 should be deferred to the Centre Plan process for roads in the Regional Centre	The hierarchy road map shows the interconnectivity and function of the existing regional road network and will itself inform the Regional Centre Plan process.	

POLICY AREA – COMMUNITY ENERGY			
SUBMISSION REFERENCE #	COMMUNITY FEEDBACK (The issues and comments received have been summarized below. Please refer to full submission for more detail)	STAFF RESPONSE	CDAC DIRECTION
3.63, 4.2	More encouragement in the Regional Plan for Green Building Standards.	The Community Energy Plan provides guidance for action. The Downtown Halifax Plan provides a density bonus for “Green” Building Standards.	
3.67	More consideration for Solar Energy.	The issue will be addressed through the Community Energy Plan. In Draft 3 Tables 3-1 and 3-2 will be revised to include performance energy efficiency.	

4.6	The Community Energy Plan will be irrelevant when the Regional Plan is approved.	Plan policy recognizes that priority plans are updated and the most recent version takes precedence (Section 1.6.1(4)).	
3.23	The economics strategy calls for creation of district energy. This could be linked to policy E-28	Agreed.	

POLICY AREA – REGIONAL CENTRE			
SUBMISSION REFERENCE #	COMMUNITY FEEDBACK (The issues and comments received have been summarized below. Please refer to full submission for more detail)	STAFF RESPONSE	CDAC DIRECTION
4.30	The Regional Plan should provide a clear framework for the centre plan.	Chapter 6 includes the vision and principles, adopted by Council. A detailed work plan will be brought to Council for Centre Plan after the RP+5 process concludes.	
3.80	HRM has to do more to enable developers to invest in the urban core	CDAC has previously requested a change to the Centre Plan Chapter to emphasize that we would consider incentives as an additional way to encourage growth in the regional centre. This will be added as a policy in Chapter 6.	
3.80	Use bonus zoning to promote green building initiatives. HRM has ignored previous requests on this topic.	Green building standards are acceptable in the Downtown Halifax Plan for bonus zoning, the only place in HRM where this practice is used. Green building justification is the most common used by the development industry. The proposed new legislation concerning the use of bonus zoning in the Regional Centre focuses very heavily on affordable housing.	

3.80	Storm water management design standards in HRM lag behind other communities in terms of creating more natural and aesthetically pleasing facilities for Stormwater.	The design standards for the storm-water system, is under the supervision of the Utility and Review Board. HRM is currently developing a storm-water management bylaw to establish standards for private property. Staff will examine best practices.	
3.23	Policy EC-15 should more specifically state in what manner council should work with groups to accomplish this goal.	This matter is fully addressed in the Economic Strategy.	
3.27	Objection to the removal of the map showing opportunity sites within the Regional Centre and related policy. More specifically, the comments were into regard to a vacant property in Downtown Dartmouth	Parallel to the RP+5 exercise, staff is also currently working on a new municipal planning strategy and land use by-law for the entire Regional Centre. Sites that were identified as opportunity sites in the 2006 Regional Plan will be re-evaluated through this exercise which is intended to be completed in 2015. In the meantime, the Downtown Dartmouth Secondary Planning Strategy will continue to identify the vacant property referenced in the public submission as an opportunity site. Moreover, Council will continue to consider site specific MPS amendments on a case by case basis within the Regional Centre, until the Regional Centre Plan is adopted. It is important to note that the opportunity sites were just identified as such, and were not assigned any additional height, massing or density. Therefore, a planning application would still have been required to do anything beyond the existing as-of-right context.	

4.16		<p>Limiting the scope of the proposed Regional Centre Plan. The neighbourhoods in peninsular Halifax and Dartmouth are varied. Between 1978 and 2000, neighbourhood plans were developed to recognize, celebrate and protect those differences. These plans involved extensive consultation. The strategies recognize detailed local circumstances in a way that a new, “one-size-fits-all” strategy and by-law covering the whole area never could. The proposed Regional Centre Plan should not eliminate or replace existing neighbourhood plans, but should supplement them. (Section 6.4)</p>	<p>Most of the planning regime that currently exists in Dartmouth and Peninsula Halifax, with the exception of Downtown Halifax, date back to 1978 or earlier. Some of the concepts and ideas that informed these plans are therefore dated and no longer relevant. However, the policies and land use regulations that are still relevant will be maintained and incorporated into the new Plan and Land Use By-law, albeit under a different format. While one Plan and Land Use By-law are being proposed, it does not mean that a one-size-fits-all approach will be used. Things like height calculation methodologies, parking stall size requirements, and definitions can certainly be standardized across the Regional Centre, but the differences in built form character and local circumstances will certainly be recognized. This will be accomplished through an extensive public consultation program.</p>	
3.23		<p>Concerned that the draft Regional Plan amendments do a poor job in laying out the groundwork of the Regional Centre Plan, as well as affix a timetable to it.</p>	<p>Staff feel that Chapter 6 is sufficient in laying out the groundwork for the new Plan, which will be developed through substantial consultation with stakeholders and the general community. The detailed work plan will be sent to Council under separate cover</p>	

3.23		RC-2 (pg. 72) should add that the Barrington Street tax/grant program should be extended for a further 5 years. The initial program was fully subscribed and there are several landlords wanting to make significant improvements to their historic buildings. An extension of the program would be popular, and the resulting lift in property assessments would exceed HRM's financial expenditure.	This should be investigated further, and will be the subject of a separate report.	
3.23		RC-3 needs a timetable to ensure the Regional Centre Plan follows immediately on the heels of the Regional Plan's adoption.	Preliminary scoping work in support of the Regional Centre Plan has already begun and it is anticipated that a new Plan and associated documents will be ready for Council's consideration sometime in 2015.	
3.23		RC-4 This should be more specific in terms of how Council considers the recommendations of the Strategic Urban Partnership (i.e. an annual report to Council).	The Strategic Urban Partnership is free to send as many recommendations to Regional Council per year as it deems necessary. Staff did not want to hamstring the SUP by making RC-4 too specific. However, if the SUP wishes to have its role restrained, then this is something that the CDAC can consider.	
3.23		There has been a precipitous decline in commercial office space downtown, as an overall percentage. Also, much of the new development happening downtown, is redevelopment which will be occupied by existing tenants downtown, with perhaps little backfilling of their vacant space. It is clear that this situation should be reversed, in order to fulfil the objectives of the Regional Centre chapter.	One large commercial office development (Emera HQ) has been completed in Downtown Halifax since the Regional Plan came into effect and two more projects are currently under construction (Waterside and TD Tower expansion). In addition the Westhill on Duke St. was recently approved by the Design Review Committee, but has yet to begin construction, while other projects including the Nova Centre are currently in various phases of planning and design. The Downtown Halifax office market is seeing substantial growth at present.	

	4.16	HRM should conduct a residential location study to better understand why residents choose to locate in the centre vs other areas.	Staff accept this as a good suggestion to be considered as part of the centre plan process.	
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POLICY AREA – HEALTHY COMMUNITIES

	SUBMISSION REFERENCE #	COMMUNITY FEEDBACK (The issues and comments received have been summarized below. Please refer to full submission for more detail)	STAFF RESPONSE	CDAC DIRECTION
	4.5,3.14,3.20, 3.26,3.47,3.49,3.60,3.82,4.3, 4.20,4.22,4.19,3.79	Insert statements from previous drafts relative to Healthy Communities/Food Security.	Food security is being addressed in Chapter 3 objectives. Healthy Communities are already referenced. (Food Security is also a Policy Area)	
	4.38	Create a new principle that focuses on creating healthy lifestyles.	Community design focusing on healthier lifestyles is integrated throughout the Plan.	
	4.38	The overall themes of prosperity, mobility, liveability etc. are not well reflected in the plan.	Staff believe the Plan’s vision and principles reflect these themes in the new objectives and in plan policy)	
	4.30	Collaborate with Public Health to develop a community assessment tool and a rural active development assessment tool.	Agreed.	

POLICY AREA – CULTURE AND HERITAGE

	SUBMISSION REFERENCE #	COMMUNITY FEEDBACK (The issues and comments received have been summarized below. Please refer to full submission for more detail)	STAFF RESPONSE	CDAC DIRECTION
	4.17	Heritage performance measures should be included.	Agreed. Measures will be added to Appendix A.	

	3.16	Reduce the area earmarked for a proposed Heritage Conservation District to exclude the Delta Barrington and Barrington Places facades.	The actual boundaries of the historic properties Heritage Conservation District will be determined through a future planning exercise under the Heritage Property Act.	
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POLICY AREA – FLOODPLAINS				
	SUBMISSION REFERENCE #	COMMUNITY FEEDBACK (The issues and comments received have been summarized below. Please refer to full submission for more detail)	STAFF RESPONSE	CDAC DIRECTION
	4.30	HRM should restrict development and placement of fill within flood plains.	Policy E-21 adequately deals with this.	

POLICY AREA – UNDERGROUND WIRING				
	SUBMISSION REFERENCE #	COMMUNITY FEEDBACK (The issues and comments received have been summarized below. Please refer to full submission for more detail)	STAFF RESPONSE	CDAC DIRECTION
	3.1, 3.6, 3.13, 3.80	Eliminate requirement for underground wiring.	The revised draft will require undergrounding of secondary services only.	

POLICY AREA – ECONOMY				
	SUBMISSION REFERENCE #	COMMUNITY FEEDBACK (The issues and comments received have been summarized below. Please refer to full submission for more detail)	STAFF RESPONSE	CDAC DIRECTION
	3.68, 3.11, 4.37	Taxation and Infrastructure charges need to be adjusted to encourage and direct development towards existing services areas	Policy EC-14 calls for financial priorities plan to seek financial strategies that support the Plan’s stated outcomes under HRM’s charter, infrastructure charges are meant to recover costs, not direct growth.	
	4.37, 3.68, 3.11, 3.23	The Plan should include provisions to identify the impact of new development or existing commercial districts.	The Plan relies most heavily on incentives to encourage growth in the Regional Centres. The Plan also limits commercial development in municipal business parks.	
	4.23, 3.68, 3.23	Policy EC-6 relating to private business parts encourages “sprawl” and erodes health of existing growth centres.	Private business parks may be developed through secondary planning processes and this flexibility should be returned to promote a closer live-work relationship in suburban growth centres.	

POLICY AREA – INDUSTRIAL LANDS				
	SUBMISSION REFERENCE #	COMMUNITY FEEDBACK (The issues and comments received have been summarized below. Please refer to full submission for more detail)	STAFF RESPONSE	CDAC DIRECTION
	3.1	Private basins, ponds, should be exempt from parkland dedication requirements.	Active Transportation and other parkland uses are significant amenities in business park design.	

POLICY AREA – IMPLEMENTATION			
SUBMISSION REFERENCE #	COMMUNITY FEEDBACK (The issues and comments received have been summarized below. Please refer to full submission for more detail)	STAFF RESPONSE	CDAC DIRECTION
3.1, 4.40	Remove Policy G-9 requiring that secondary planning be consistent with Regional Plan.	If through a secondary planning process, a regional plan amendment is considered appropriate, it may be dealt with by Council at that time.	
4.17	Amendments to Secondary Plans should be consistent with Regional Plan	Policy G-9 addresses this already	
4.17	Site-Specific plan amendments should not be considered by Council.	There may be circumstances where site specific amendments may provide opportunities to advance the plan’s principles.	
4.28	Use RP+5 to retool to Secondary Planning process to make it relevant to rural growth centres.	The regional plan does provide new direction for secondary plans in rural areas including definition of growth centres. (Table 3-2)	
4.17	Revise Policy G-15 to include not just conservation design development agreements but all development agreements and LUB amendments.	Agreed.	
3.1	Specify timelines for secondary plans for growth areas under S-2 and S-9.	The staff report will address secondary planning priorities.	
4.30	Urban settlement designation within the Regional Plan be comprehensively applied to contain development. (Cross-reference with Growth Management Policy Area)	The Urban Settlement Designation is applied as HRM’s Urban Growth boundary.	

4.32		<p>“Harbour Zone” – This must be re-examined, and the Regional Subdivision By-law clause 9(1) must be redrafted to eliminate any possible ambiguity in its interpretation, so that it clearly reflects the actual intention of the Regional Plan. It has until 2012 been interpreted as written, but a pioneering interpretation used at Boscobel Road would open the door to densification along large expanses of the Halifax Harbour shoreline (Bedford Basin, Northwest Arm, Herring Cove headlands and Eastern Passage), which have since 2006 been assumed to be off-limits for the creation of new public streets due to Section 9(1). (see Map 2, Regional Plan)</p>	<p>Section 9(1) of the Regional Subdivision By-law is clear as currently written, i.e. Harbour designated lands within the Urban Service Area are able to be subdivided, even if it leads to the creation of new public streets. The Boscobel lands are designated Harbour under the Regional Plan and are contained within the Urban Service Area as shown on Schedule B of the Regional Subdivision By-law.</p>	
4.32		<p>The reading of Section 9(1) of the Regional Subdivision By-law has major ramifications for the shape of HRM. Because almost all of the Harbour zone lies outside of the “Urban Core”, it will make a difference whether serviced Harbour zone is a densification target or not. If it is a densification target, it will draw considerable investment out of the downtown core, but will also strongly tend to devalue existing investment (including significant HRM funding) in servicing the designated “Growth Areas” of HRM. Encouraging shoreline densification may well expose HRM taxpayers to considerable liabilities arising from storm surge damage.</p>	<p>Densification in HRM is being targeted to lands contained within the Urban Serviced Area, which also includes some lands designated Harbour under the Regional Plan. Other controls are being implemented to ensure that new residential developments constructed along the shoreline are built at elevations that will mitigate storm surge events.</p>	

	4.32	The public should have some input in decisions on parkland dedications related to the subdivision process. These dedications should never be taken as cash-in-lieu if there is a viable citizens group interested in maintaining a particular public right.	Cash-in-lieu is preferred over land dedication in certain situations when a given area of the Municipality already has an abundance of parkland. The cash can then be used to invest in areas where there is a lack of parkland or park infrastructure (i.e. a need for a soccer pitch, a baseball field, etc.) The subdivision process is not a public process and has strict timelines for processing, which does not make it feasible to be opened up for public comments.	
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POLICY AREA – COMMUNITY ENGAGEMENT				
	SUBMISSION REFERENCE #	COMMUNITY FEEDBACK (The issues and comments received have been summarized below. Please refer to full submission for more detail)	STAFF RESPONSE	CDAC DIRECTION
	4.38	Change HRM’s role from “encouraging” to “leading” the development of working partnerships with the Province.	The plan supports HRM working collaboratively with the Province.	
	3.64	Community engagement as described in Chapter 9 limits the ability to understand values and, long term direction.	The plan is consistent with the council approved community engagement strategy.	

POLICY AREA – PERFORMANCE MEASURES				
	SUBMISSION REFERENCE #	COMMUNITY FEEDBACK (The issues and comments received have been summarized below. Please refer to full submission for more detail)	STAFF RESPONSE	CDAC DIRECTION
	3.64	The plan review presents the opportunity to identify how public investment can attract growth to the Regional Centre.	Agreed.	

	4.30	Include a table showing how indicators are related to objectives	Agreed. This will be included in revised Appendix A.	
	3.43, 3.64, 4.7	Use some of measures identified in Stantec Report – establish clean benchmarks.	Agreed. Staff continue to refine the plan’s measures, and align them with objectives	