



PO Box 1749
Halifax, Nova Scotia
B3J 3A5 Canada

MEMORANDUM

TO: Community Design Advisory Committee
CC: Heritage Trust
FROM: Austin French, Manager of Planning, Planning & Infrastructure
DATE: September 16, 2013
SUBJECT: **RP+5: SUBMISSION 4.18 [HERITAGE TRUST]**

It is acknowledged the Heritage Trust's comments on Draft 2 of the revised Regional Plan, regarding Chapter 1 Introduction and Chapter 3 Settlement and Housing, were inadvertently omitted from the Phase 3 Response to Public Input submitted for your review. The Heritage Trust's comments (Reference #4.18 in the RP+5 Draft 2 Public Written Submissions Package IV) are pasted below in bold text; the comments are followed by a staff response. (The online Phase 3 Response to Public Submissions Table will be amended to include these comments)

Reference # 4.18

Comments on Chapter 3, Housing, of the Regional Plan Review

Affordability:

The Heritage Trust supports the provision of affordable housing. We encourage HRM to adopt an experience-based and science-based approach to housing affordability. The Trust has studied the costs of housing in HRM; we attach the results of this study.

There are two important lessons to be learned:

1. Existing housing is affordable; new housing is not. The average monthly rent for a two-bedroom apartment in a building built since 2000 is \$1,289, which is 54% greater than the rent for an apartment built before 1960, and 64% more costly than an apartment built between 1960 and 1974. Developers cannot produce new housing at costs comparable to existing housing. Families with average incomes can only afford to rent existing housing.

2. Housing in medium-sized buildings is affordable; most housing in large buildings is not. Two-bedroom apartments in buildings with 50 to 99 and more than 100 units are most expensive, with average monthly rents of \$1,019 and \$1,016, respectively. These are 35 % higher than the rents for two-bedroom apartments in buildings with six to 19 units. We believe that it is mathematically impossible to provide affordable housing in a new concrete high rise.

To address the first lesson, a new clause (h) could be introduced in Policy S-33, as follows:

“(h) identifying existing affordable housing and taking measures to protect it, including ensuring that building envelopes allowed in the Land Use By-law support and encourage the retention of the existing housing.”

Response: Staff agrees that existing housing stock is an important source of affordable housing options. This is the rationale behind the intention, during secondary planning, to encourage secondary suites, thereby providing an option that makes ownership of existing housing stock more affordable, while increasing the number of smaller, more affordable units. Future secondary planning will be based on the premise of respecting established neighbourhoods and directing growth to suitable areas. This is evident in the revised Regional Plan policy language concerning the Regional Centre. The *Centre Plan* will be the major secondary planning exercise undertaken following completion of the 5 year review.

Chapter 1 - Introduction of the draft revised Regional Plan states the protection of existing neighbourhoods will be a key focus of the Regional Centre Plan. Amendments introduced through the plan’s first 5-year review focused on the theme of ‘*Enhancing the Regional Centre*’ to ‘*Create robust tools that protect neighbourhood character and scale.*’

Chapter 6 of the revised Regional Plan reflects this intent in Section 6.2.1 - “*The Regional Centre will assert and affirm a legible and ordered urban structure that will reinforce the best qualities and characteristics of its unique neighbourhoods and districts.*”

To further reinforce the value of existing affordable housing stock, staff agrees with the inclusion of additional consideration for the development of secondary plans. In Draft 3, Policy S-29 includes an additional provision:

h) Identifying existing affordable housing and development of measures to protect it.

Staff do not recommend the addition of language around building envelopes as this could be too restrictive and presupposes how a community would like to protect existing housing stock. Suitable measures could conceivably include incentives that allow additions or relaxations of land use by-law requirements to make owning these buildings more attractive, similar to the relaxations permitted for heritage buildings. An additional consideration for community dialogue would also be how affordable is to be defined.

To address the second lesson, we note that the current draft of clause (f) in Policy S-33 encourages incentive or bonus zoning. If this encourages buildings of more than 20 units, the housing is likely to be more expensive. This could be amended to read:

“(f) introducing incentive or bonus zoning for buildings of up to 20 residential units.”

Response: Staff does not agree with this position. The intention of incentive or bonus zoning is to make the inclusion of affordable housing options attractive to developers. The addition of restrictions on the maximum number of units could be a deterrent. The number of units, height, density, etc., are best established based on what is suitable for a neighbourhood and what a community is comfortable with.

Existing Housing and Neighbourhoods:

The projections in the introduction show that at least 80% of HRM residents will be living in presently existing housing in 20 years. A chapter on housing should emphasize the existing housing and existing neighbourhoods. . Objective 3 does contain the phrase, “protect neighbourhood stability and support neighbourhood revitalization,” but this is not backed up by any policy.

HRM has neighbourhood planning and zoning rules that protect this housing. It is important that planning and zoning rules continue to protect existing housing.

One of the provisions in Chapter 6 of the draft Regional Plan Review would rescind these neighbourhood planning and zoning rules. The draft Plan Review thus constitutes a threat to this housing.

The Trust requests that a new Section 3.6 be added to the draft chapter to carry out Objective 3 and to carry on and generalize some of the policies of the existing neighbourhood plans. We have selected policies from the existing neighbourhood plans, which are already Council policy. Adoption of these policies will extend the protections enjoyed by some neighbourhoods to the other neighbourhoods in HRM. Here is some draft content for that section:

“Section 3.6, Existing Housing and Neighbourhoods:

“Policy S-38: The Municipality shall encourage the retention and rehabilitation of existing structurally-sound housing units in order to maintain the stability of residential neighbourhoods. (From Bedford Highway Secondary Planning Strategy, Policy 1.1)

See response above.

“Policy S-39: The Municipality shall ensure that new construction in residential neighbourhoods is compatible with the existing scale and character of the area. (From Bedford Highway Secondary Planning Strategy, Policy 1.2)

See response above.

“Policy S-40: The Municipality shall encourage the retention and creation of dwelling units suitable for families with children. (From Peninsula Centre Area Plan Policy 1.1.1)

Response: Proposed plan Policy S-32 states, “*HRM shall monitor housing and demographic trends to assist in determining future housing needs.*” The types of housing, such as the number of bedrooms should be linked to the demographics and the established need of a community. There are some neighbourhoods in HRM where the greatest need and demand is for smaller unit types; limiting development to larger units would be counter to this need. Demographics and housing need will be determined as a part of the secondary planning process. Housing types, such as a suitable mix of units, would be tailored to meet the need and demand.

“Policy S-41: Residential uses should be buffered from non-residential uses which are inappropriate to a stable, healthy, enjoyable living environment. (South End Area Plan Policy 1.)

Response: New secondary plans, similar to existing plans, will contain provisions to reduce nuisance impacts between different uses and prohibit or limit uses that are incompatible with residential development (i.e. heavy industrial). However, the appropriate mix of uses and the particular controls are best determined based on community features, needs and wishes, to be determined when the secondary plans are being developed.

“Policy S-42: When disposing of municipally-owned lands in residential areas, consideration will be given first to recreational uses; second, to residential uses; and third, to any other use compatible with the residential areas that meet the needs of the residents of the area. (From South End Area Plan Policy 1.6.1)

Response: This policy could potentially contravene HRM’s recently adopted Administrative Order 50 Respecting the Disposal of Surplus Real Property. This new Administrative Order establishes a process for community groups to access surplus municipal properties, which may include affordable and special needs housing. This process is based on proposals from the community as opposed to prescriptive uses.

“Policy S-43: The Municipality shall foster the provision of housing for people with different income levels in all neighbourhoods, in ways which are compatible with these neighbourhoods. In so doing, the Municipality will pay particular attention to those groups which have special needs (for example, those groups which require subsidized housing, senior citizens, and the handicapped.) (From Halifax Municipal Planning Strategy Policy 2.8)”

Response: Staff are of the opinion the Regional Plan objective 3.1.4(g), “*Provide housing opportunities for a range of social and economic needs and promote aging in place*” addresses this concern.

In the opinion of Planning staff, the policy suggestions outlined by the Heritage Trust, are too broad to achieve the ultimate goal of preserving and promoting housing affordability. Staff feels this goal is best achieved through secondary planning via neighbourhood-level or even site-specific policies that are developed based on the existing community fabric, community values and desires, and specific community need.

Comments on Chapter 1, Introduction, of the Regional Plan Review

On page 9 the chapter says 11,960 jobs are likely to be created by 2031, but that 60,825 new dwelling units would be required. There is a mis-match here, which is not explained.

Response: The demographic information is explained in the Stantec Study. In draft 3, the actual figures were removed and direct reference made to the Stantec Study. Staff are of the opinion is it not necessary to include the figures in the plan.

The population given of 409,510 in 2011 does not match the Census figure of 390,096. This is not explained.

Response: The 2011 Census counted 390,096 people in HRM during the national enumeration. Statistics Canada then produced a population estimate; the population estimate for HRM – 409,510 - is included in

the plan. Information provided on the Statistics Canada website: <http://www.statcan.gc.ca/hp-pa/estima-eng.html> provides further explanation and outlines why there are differences between census counts and population estimates.

PLANNING SECTION, PLANNING AND INFRASTRUCTURE

Tel: (902) 490-6717 E-mail: frencha@halifax.ca
Web Site: www.halifax.ca

