



RP+5
Regional Plan 5 Year Review

RP+5 DRAFT 2

**PUBLIC WRITTEN SUBMISSIONS
(PACKAGE III)**

(Received July 6 - 19, 2013)

HALIFAX
REGIONAL MUNICIPALITY

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Reference # 3.1



16 July 2013

Dale Godsoe
 Chair – Community Design Advisory Committee
 Halifax Regional Municipality
 P.O. Box 1749, Halifax Nova Scotia
 B3J 3A5 Canada

Dear Ms. Godsoe:

Armco is pleased to see the RP+5 process progressing, and is supportive of many of the initiatives of the Plan as presented in Draft 2. We would like to take the opportunity to highlight some concerns we have with the plan as it currently stands.

Limiting of Growth and the Extension of Services

1. The Regional Plan objectives will limit growth outside of the urban core.
2. The Plan has significant implications for affordability, housing choice and the competitive market.
3. There must be the ability to alter service boundaries and related designations in response to opportunities that are consistent with Halifax Water’s Integrated Resource Plan.

Chapter 6 discusses growth in the Regional Centre. We support a strong and growing Regional Centre as being good for all, but believe this cannot be at the expense of those outside the Regional Centre. As such, we support the maintenance of the current 25-50-25 growth targets, and do not wish to see them changed.

Policy	Suggested Change
“Direct new growth to areas where infrastructure and services already exist.” (Chapter 1, Introduction, 1.1)	Implication for no new service boundary extension. Requires clarification.
“Focus new growth in centres where supporting services and infrastructure are already available;” (Chapter 1, 1.3, Objectives)	Implication for no new service boundary extension. Requires clarification.
3.2.1 Morris Lake has been removed as an Urban Settlement growth area	Continue to list Morris Lake as an Urban Settlement growth area, with the understanding that certain servicing issues must be resolved prior to development.
“Due to constraints in the Sackville wastewater collection system, there are properties in Middle	“Due to constraints in the Sackville wastewater collection system, there are



<p>Sackville which are within the Urban Service Area but cannot be developed until capacity becomes available. Special provisions shall be made in the Sackville Municipal Planning Strategy to allow for development of these properties if capacity becomes available.” (Chapter 3)</p>	<p>properties in Middle Sackville which are within the Urban Service Area and which require alternative techniques and approaches which mitigate the negative impact of these developments on the existing system.” (Chapter 3)</p>
<p>3.2.2 Urban Reserve</p>	<p>We would like Bisset Road (PIDs:), the Brookview MacDonald Land (PIDs: 40252926, 41129974, 41130055), and Green Acres (PIDs: : 00325985, 00330803, 00330811, 00319871 - the portions outside of the Urban Settlement designation) to be included as Urban Reserve areas.</p>
<p>8.1 “Manage growth to make the best use of existing water, wastewater and storm infrastructure and avoid unnecessary or premature expenditures;” (Chapter 8)</p>	<p>The definition of "unnecessary or premature expenditures" needs to be clarified.</p>
<p>“SU-5 HRM shall seek to prevent premature development with on-site services on lands designated Urban Settlement but not yet within the Urban Service Area by establishing an Urban Settlement Zone over these lands under the applicable land use by-law. This zone shall permit public parks and playgrounds but restrict new development to single unit dwellings serviced with on-site sewage disposal systems and wells on two hectare lots on existing roads.” (Chapter 8)</p>	<p>The following PIDs should be exempt from this requirement: Sandy Lake (PIDs: 00646000, 41374760, 40202806, 41127945, 00417949), Green Acres (PIDs: 00325985, 00330803, 00330811, 00319871), Port Wallace (PIDs: 40173734, 40173726, 40686826, 40880247, 40880239).</p>
<p>“SU-6 When considering any expansion of the Urban Service Area, HRM shall have regard to the following: (a) that a Secondary Planning Strategy for the lands to be included within the Urban Service Area has been adopted by HRM except that this requirement may be waived where, in the opinion of HRM, the proposed extension represents a minor adjustment to the Area; (b) the financial ability of HRM to absorb any costs relating to the extension; (c) a watershed or sub-watershed study has been completed in accordance with Policy E-24;</p>	<p>to section (a) add: "or relates to lands which have been identified as being suitable for urban serviced development at Sandy Lake (PIDs: 00646000, 41374760, 40202806, 41127945, 00417949), Green Acres (PIDs: 00325985, 00330803, 00330811, 00319871) and Port Wallace (PIDs: 40173734, 40173726, 40686826, 40880247, 40880239)."</p>



<p>(d) that, if required to pay for growth-related municipal infrastructure costs, a municipal infrastructure charge area has been established or is adopted concurrently with the boundary amendment; and</p> <p>(e) a charge needed to pay for growth related improvements to the water, wastewater or stormwater services has, where required, been approved by the Utility and Review Board.”</p> <p>(Chapter 8)</p>	
<p>“SU-25 HRM shall require, under the Subdivision By-law, the underground placement of electrical and communication lines for subdivision applications in which new streets are proposed.”</p> <p>(Chapter 8)</p>	<p>Remove this policy. It is problematic due to the increased cost to developers which will be passed along to the consumer, resulting in increased housing costs.</p>
<p>“S-2 Where requests are received to initiate secondary planning for any of the three sites identified above as potential growth areas, consideration shall be given to:</p> <p>(a) the need for additional lands and the fiscal implications to HRM and Halifax Water and their capacity to meet additional financial commitments; and</p> <p>(b) the implications for achieving the HRM growth targets.”</p> <p>(Chapter 3)</p>	<p>Add timeline for the completion of secondary plans for growth areas.</p>
<p>Table 3-4, "Maximum Net Density"</p>	<p>Excluding riparian buffers, wetlands, slopes, and floodplains from the land area used to calculate density for open space design limits the feasibility of development when the open space requirement must come from the net developable area</p>
<p>9.4 Secondary Planning Strategies G-9 "When new secondary planning strategies or amendments to existing secondary planning strategies are brought forward for approval, Council shall consider whether the proposed objectives of this Plan, including any plans referenced by policies of this Plan for guidance"</p> <p>(Chapter 9)</p>	<p>Remove this policy. This undermines the legitimacy of the aspirations of individual communities where they may differ from Regional goals, which are inherently different in nature. The logical extension of this policy is to repeal all Secondary Planning Strategies.</p>



Timeline Issues

1. The priority plans that must be created as prerequisites for development lack structure and timelines in the RMPS.

A major area of concern for Armco is the timelines associated with seeking approvals. HRM must look at its processes, in order to streamline approval decision making. The stacking of requirements is confusing, expensive and acts as an impediment to development. We would like to see Council policy guiding timelines within the draft Regional Plan. When HRM approves this plan, we urge you to reflect on the approval timelines that each new requirement would bring. It is difficult enough to get approvals for lands already within the RMPS with development rights, but then adding new requirements, such as the Green Belt and Open Space Priority Plan, that must be in place before the long secondary planning process is undertaken is onerous and creates a level of risk that is unacceptable.

Policy	Suggested Change
<p>“S-2 Where requests are received to initiate secondary planning for any of the three sites identified above as potential growth areas, consideration shall be given to: (a) the need for additional lands and the fiscal implications to HRM and Halifax Water and their capacity to meet additional financial commitments; and (b) the implications for achieving the HRM growth targets.” (Chapter 3)</p>	<p>Timelines or priorities for the completion of these secondary planning strategies should be included.</p>
<p>“S-9 HRM shall prepare secondary planning strategies for the centres outlined in Tables 3-1 and 3-2 with consideration given to:” (Chapter 3)</p>	<p>Include timelines or priorities for secondary planning strategies</p>
<p>“Governance and Implementation” Chapter 8</p>	<p>No mention of timeline issues, or the need for development approvals to take place in a predictable streamlined manner.</p>
<p>E-24 “Watershed or sub-watershed studies concerning natural watercourses shall be carried out as part of comprehensive secondary planning processes. These studies shall determine the carrying capacity of the watersheds to meet water quality objectives. The studies, where appropriate, shall be designed to:”</p>	<p>This policy must set priorities for which watershed studies are the most important, when they will take place, what triggers them, and if the developer can play any role in ensuring the studies are completed in a timely manner.</p>



(Chapter 4)	
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Parkland Dedication and Greenbelting

2. Concern that greenbelting will be used as a development control technique
3. The process for greenbelting itself, and for creating a Priorities Plan, are unclear
4. The term “greenbelting” is misleading. What HRM is proposing in the new RMPS is not traditional greenbelting and is therefore likely to be misunderstood by the public.
5. Lack of clear parkland process.
6. Lack of transparency in parkland needs.
7. Demanding money, instead of being willing to accept land, makes the parkland dedication a tax grab for the municipality.

Greenbelting has been traditionally used, in other cities, to refer to a preserved area of farmland or wilderness that serves to place a limit on development, and contain a city within the boundaries of the greenbelt. A review of the draft RMPS indicates that HRM does not intend to implement a traditional greenbelting policy. However, due to the prevalent use of the term, there is potential for public misunderstanding, backlash against development, and confusion when moving forward with the Greenbelting and Public Spaces Priorities Plan.

Policy	Suggested Change
HRM may consider permitting private business parks in appropriate locations within or adjacent to designated growth centres. (Chapter 5, EC-6)	Insert EC-6A: “As HRM exempts itself from parkland dedication in business parks, as it is not useful for such areas, privately owned business parks shall be similarly exempt.”
“E-6 HRM shall, through the Subdivision By-law, establish a requirement for a minimum of 10% park dedication for new subdivisions. Existing residential subdivisions outside of the Interim Growth Management Area as well as those permitted under Policies S-12 and S-15 of this Plan shall be subject to a 5% park dedication requirement.” (Chapter 2)	The parkland dedication process requires clarification. As it currently stands, the process results in undue financial burden to the developer, last minute delays and inequities for the developer. Appropriate changes would include clear decision making timelines for accepting parkland, a willingness to consider parkland dedication outside of the subdivision, the possibility to include wetlands as park dedication, and a willingness for Staff to work with the applicant to find reasonable and equitable solutions. Additionally, in areas where neither land nor capital contribution is required, parkland dedication fees should be waived.
E-12 <i>A Greenbelting and Public Spaces Priorities Plan</i> (Chapter 2)	Policy E-12, concerning the Greenbelting and Public Spaces Priorities Plan, makes no indication that greenbelting will be linked with



	<p>parkland. Discussions with HRM staff and the CDAC have indicated that the developer, or private landowner, will be expected to continue to hold any lands designated as greenbelt indefinitely for the public good. This places an unfair property tax and continued maintenance burden on the property owner. We believe that if a piece of land is important enough to be considered for greenbelting it should, therefore be suitable for parkland dedication. HRM should be willing to accept these pieces of land as parkland dedication.</p>
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Wetlands

1. HRM lacks jurisdiction over wetlands, therefore the RMPS should not include regulations relating to wetlands.

Policy	Suggested Change
<p>"E-15 HRM shall, through the applicable land use by-law, establish a Wetlands Schedule to be used as a reference in determining the presence of wetlands 2000 m² or greater in area. On all applications for development approval, the by-law shall require the proponent to verify the existence and extent of any wetland shown on the schedule. The by-law shall prohibit development within any such wetland."</p>	<p>Remove policy.</p> <p>Policy E-15 inserts the Municipality into the process of wetland regulation within HRM. Wetlands are a Provincial responsibility, and their management, steps for mitigation, and methods for identifying them are regulated through the appropriate provincial authority.</p>

Riparian Buffer

1. The current 20 m riparian buffers are appropriate, however HRM lacks jurisdiction over these buffers and therefore should not include such regulations in the RMPS.

Policy	Suggested Change
<p>"E-16 HRM shall, through the applicable land use by-law, require the retention of a minimum 20 metre wide riparian buffer along all watercourses throughout HRM to protect the chemical, physical and biological functions of marine and freshwater resources. The bylaw shall generally prohibit all development within the riparian buffer but provisions shall be made</p>	<p>Remove policy.</p>



<p>to permit boardwalks, walkways and trails of limited width, fences, public road crossings, driveway crossings, wastewater, storm and water infrastructure, marine dependent uses, fisheries uses, boat ramps, wharfs, small-scale accessory buildings or structures and attached decks, conservation uses, parks on public lands and historical sites and monuments within the buffer. In addition, no alteration of land levels or the removal of vegetation in relation to development will be permitted.”</p>	
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Sincerely,

ARMOC CAPITAL INC.

Original Signed

Chris Millier,
Vice President of Community Development

cc. Austin French

Reference # 3.2

From: Steve Baker

Sent: July 11, 2013 11:55:52 AM (UTC-04:00) Atlantic Time (Canada)

To: Regional Planning Office, HRM

Subject: Plan HRM

Dear Sir/Madam-

I am an HRM resident who attended the planning meeting at the Holiday Inn in Dartmouth on June 17. I am writing to express my concern with the pro-development slant of the draft plan. Specifically:

1. I believe that clause G-16 is unacceptable as it opens **way** too much land to development. Lands abutting serviced land and Harbour lands must not be able to be re-designated!
2. I strongly support efforts to designate the Purcell's Cove/William's Lake Backlands as a Greenbelt Area completely off-limits to development.
3. I support the Stantec Consulting recommendation for the establishment of new growth targets for our Regional Plan to 50% urban, 25% suburban and 25% rural.
4. In light of our failure to meet even the more modest current growth targets I strongly support following the lead of other Canadian cities (e.g. Toronto and Victoria) and charging developers \$50,000-60,000 per suburban lot to help create incentives to build in the urban core.

Sincerely,

Steve Baker

Reference # 3.3

From: Frankie Baldwin

Sent: July 18, 2013 9:57:49 PM (UTC-04:00) Atlantic Time (Canada)

To: Corser, Susan; Tota, Kasia; Regional Planning Office, HRM; Mayor

Cc: Outhit, Tim; kelly@kellyregan.ca

Subject: Bedford Waterfront

Dear Mayor & Community Development advisory Council,

I am writing to provide input for the proposed Regional Plan (RP+5) document and in particular to let you know that Save Bedford's Waterfront society is very concerned that RP+5 heavily favors the interests of the developers, rather than protecting the best interests of HRM taxpayers & preservation of our urban wilderness areas, coastal waterways and harbour areas. As a member of the larger "Our HRM Alliance" group, the "Save Bedford's Waterfront Society" shares concerns expressed by our allies that the revised HRM Regional Plan does not adequately tackle crucial issues such as sprawl, affordable housing, transportation & green-belting, preservation of the environment & proper water buffer zones.

The MP-5 offers a few encouraging commitments towards keep Nova Scotia's coastal areas & freshwater ecosystems healthy and productive. These include the proposed water supply protection zone, and stricter restrictions around clearing vegetation around watercourses in riparian buffer zones. However, despite this, RP+5 proposes changes that will further weaken existing water and coastal policies and by-laws and have grave consequences on water quality.

While we support a renewed commitment to riparian buffer zones around all water bodies (**Section 2.3.3, Policy E-16**) - **we still feel strongly that a 30 metre buffer zone should be considered around all fresh water bodies, and wider setbacks of 60 - 100 metres for exposed or eroding coastal areas. We also support restrictions on vegetation removal from riparian buffer zones (Section 2.3.3 Policy E-16).**

Save Bedford's waterfront is very concerned with the following as it directly affects our community, environment and our waterfront:

Halifax Harbour (Section 2.3.3, Policy E-17). **Within the current plan, Halifax Harbour is exempt from watercourse buffer requirements/ Halifax Harbour is a large, complex, and diverse part of HRM.** How can this be? Within the current Harbour Zone are residential, commercial or natural areas that non-industrial and do not host marine dependent activities. This includes, but is not limited to, areas such as **Bedford Waterfront**, North West Arm, Mill Cove, Cow Bay and Eastern Passage, the former DND lands. **Watercourse buffers and setbacks should be required in these areas just as they are around other HRM watercourses!**

For those of you that may still be under the assumption that there is no natural pre-existing shoreline left on the Western Shore of Bedford basin, that assumption is wrong. There is and it needs protection.

Development Agreements and as-of-right development (Section 2.3.3 E-18). Under RP5, Riparian agreements. **Buffers are not required for as-of-right development, and need only be considered for development**

We believe riparian buffers should be required **for all developments** adjacent to a watercourse.

"Grandfathering" riparian buffer requirements (**Section 2.3.3, Policy E-19**). The proposed changes to RP-5 calls for relaxing riparian by-law requirements on lots in existence before this plan came into effect in 2006. Save Bedford Waterfront Society thinks there should be absolutely no relaxation of buffer requirements, particularly on lots that are not suitable for development such on floodplains, or low lying coastal areas!

Many aspects of the plan need more consideration and certainly more community input:

- a) Growth strategy
- b) Greenbelting
- c) Transportation
- d) Community engagement
- e) Water buffer zones

We believe that these sections of the Plan cannot be dealt with internally by the Halifax Regional Municipality (HRM) administration. They are to do with the very nature of HRM and how it reflects community values, not technical issues. It is not reasonable to wait for the public hearing, and expect informed community discussion and creative debate to inform councils'™s decision in the fall.

Clause G-16 is an overt loophole designed to be exploited by developers and removes protection for our Urban Reserve lands. **Clause G16 must be deleted.**

The Stantec Consulting report, provided to HRM Council, recommended **a growth target of 50% urban, 25% suburban and 25% rural**, in order to save the city \$3 billion over 18 years. Council should act in the best interests HRM taxpayers, heed this advice, and incorporate this as an **accountable** target in the RP+5. **The 25% urban, 50% suburban and 25% rural development target must be deleted.**

The concept of "greenbelting" should be clearly defined in RP+5 and specific areas of HRM should be protected from development under this designation.

Please let it be documented that we are very dissatisfied with the proposed Regional plan as it stands now, and are opposed to it. Please listen to the people and community groups in your city and make the positive changes. We have copied our councilor & our MLA on this as well.

Frankie & Greg Baldwin

Reference # 3.4

From: Sandra Banfield

Sent: July 16, 2013 4:41:15 PM (UTC-04:00) Atlantic Time (Canada)

To: Corser, Susan; Tota, Kasia; Regional Planning Office, HRM; Mayor

Cc: Outhit, Tim; kelly@kellyregan.ca

Subject:

Dear Mayor & Community Development advisory Council,

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Save Bedford's waterfront is very concerned with the following as it directly affects our community, environment and our waterfront:

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Development Agreements and as-of-right development (Section 2.3.3 E-18). Under RP5, Riparian agreements. **buffers are not required for as-of-right development, and need only be "considered" for development**

We believe riparian buffers should be required **for all developments** adjacent to a watercourse.

"Grandfathering" riparian buffer requirements (**Section 2.3.3, Policy E-19**). The proposed changes to RP-5 calls for relaxing riparian by-law requirements on lots in existence before this plan came into effect in 2006. Save Bedford Waterfront Society thinks there should be absolutely no relaxation of buffer requirements, particularly on lots that are not suitable for development such on floodplains, or low lying coastal areas!

Many aspects of the plan need more consideration and certainly more community input:

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We believe that these sections of the Plan cannot be dealt with internally by the Halifax Regional Municipality (HRM) administration. They are to do with the very nature of HRM and how it reflects community values, not technical issues. It is not reasonable to wait for the public hearing, and expect informed community discussion and creative debate to inform council's decision in the fall.

Clause G-16 is an overt loophole designed to be exploited by developers and removes protection for our Urban Reserve lands. **Clause G16 must be deleted.**

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The concept of "greenbelting" should be clearly defined in RP+5 and specific areas of HRM should be protected from development under this designation.

Please let it be documented that we are very dissatisfied with the proposed Regional plan as it stands now, and are opposed to it. Please listen to the people and community groups in your city and make the positive changes. We have copied our councilor & our MLA on this as well.

Best,

Sandra Banfield

VP -Save Bedford's Waterfront Society

Reference # 3.5

From: Aaron Bates

Sent: July 14, 2013 10:43:27 PM (UTC-04:00) Atlantic Time (Canada)

To: Regional Planning Office, HRM

Cc: Watts, Jennifer; Katherine Kitching

Subject: Re: Comments on Draft 2 of Regional Plan

Hello HRM,

I, like my friend Katherine Kitching, appreciate the opportunity to comment on the Regional Plan.

First, I very much echo the spirit and content of Katherine's comments.

Specifically, I strongly echo her opposition to increasing the robustness of road networks. I agree with Katherine that one of the (many) attributes that makes Halifax such a livable city is the ability (at least within the urban core) to commute by foot or by bike. Furthermore, there is now strong evidence that the creation and nurturing of walkable neighbourhoods (in contrast to an emphasis on facilitating private car use) contributes to the psychological and physical health of residents. I would like to see Halifax pursue a plan that prioritizes active transportation.

A proud Haligonian, I am spending this summer working in Nunavut. Yet, I am sufficiently motivated to ensure that Halifax improves as a city, that I write you from Pangnirtung, Baffin Island.

Respectfully,

Aaron Bates

-Begin Attachment-

2013/7/6 Katherine Kitching

Hello, please find attached (and also pasted below, same text) my submission of comments on the draft regional plan.

Thank you very much for considering the views of citizens as part of this process!

Best regards,

Katherine Kitching,

Hello- I was out of the province for June, unfortunately, and could not make it to any of the in-person final round of consultation meetings for the regional plan - (I really appreciate your public consultation process and would have liked to participate in person!).

Therefore I'd like to submit the following written comments regarding the plan. If you are interested in the demographics of your respondents, I am also happy to provide the following information about myself:

1. I am in my mid-30s and am a part-time employee at SMU and also a small business owner.
2. I live on the peninsula (in the north end)
3. I am an active transportation advocate and "practitioner" - I choose not to own a car and I bus, walk and bike to my engagements.
4. I am an outdoor enthusiast and I use parks and green spaces within and outside of HRM at least twice a week.
5. I love the City of Halifax. I chose to move here from Ontario and make my life here because to me, it is the greatest city in Canada. I plan to live here for the rest of my life and raise a family here.

GENERAL COMMENTS:

First of all, I'd like to thank the design review committee and the HRM planners for all their work - I attended one meeting as an observer, and was extremely impressed on the enormous work of listening, discussing and consensus building that has evidently been done. Thank you!

Secondly, the guiding principles listed at the start of the document are very good, in my view- and I commend HRM and everyone who has worked on the plan for establishing them.

On that note, during the final review I urge you to seriously consider whether the plan has enough "teeth" to be able to fulfill all the principles as they are currently laid out. If you feel, deep down in your heart, that the measures in the plan as it stands right now are not "toothy" enough to ensure these principles are met, then I ask you to strengthen the plan as needed! I will be bitterly disappointed if, in the next 25 years, I see development happening in the region that appears to contravene these principles. I know there have been some frustrations with HRM By Design in the downtown core, with respect to whether developments being considered (e.g. convention centre, Skye) have actually been in line with HRMBD - and I hope you will do what you can to ensure this will not happen with the Regional Plan.

Now, some more specific comments:

CONCERN ABOUT SELECT URBAN RESERVE LANDS

One of my biggest concerns is the designation of lands on both the northeastern and southwestern sides of Susie Lake -- and the designation of lands between and to the southeast of Williams and Colpitt Lakes, as "**Urban Reserve**".

In my view, these lands should be instead designated as "**Open Space / Natural Resource**".

Please consider: the Suzy Lake and Williams-Colpitt areas are some of the only remaining large-scale wilderness areas that are within easy cycling or busing distance for Peninsula residents. They are also incredible natural treasures for the communities that currently exist beside them.

For me, one of the best things about peninsular Halifax is that clean, beautiful wilderness surrounds it on all sides - this is such a rare treasure for the urban core of a (relatively) big City. In my view, it be a tragedy if these two forested areas were lost.

Therefore, I would strongly encourage you to think of future generations' enjoyment and access to these treasured spaces, and rezone these two areas so that they cannot be later opened for development.

CONCERN WITH WEAKNESS OF MEASURES TO LIMIT SUBURBAN GROWTH

*I read over parts of the Stantec report, and I am strongly in favour of going with their "best scenario", which is to focus **40-50% of future growth in the regional centre**, while trying very hard to reduce the amount of suburban growth, compared to what is laid out in the draft plan.*

*To this end, I would like to see more aggressive measures put in place in this plan, in order to make it far more expensive to develop in suburban areas vs. urban ones. As I understand it, such measures have been used effectively in other areas of Canada. I also like what Our HRM Alliance has to say about Greenbelting, and I think **Greenbelts should be used to protect recreational and wilderness areas while clearly defining the areas where human settlement can occur**-- rather than only being used as a tool to connect wildlife habitat and recreation corridors, which seems to be the main thrust of Greenbelting as it is described in the draft plan right now.*

CONCERN/QUESTION RE HYBRID CONSERVATION DESIGN DESIGNATION

Regarding Conservation Design Developments - I have visited communities where the Hybrid Conservation Design designation has been used, and I like the resulting natural aesthetic - but I am concerned about the power for abuse it leaves in the hands of the individual property owners. I would like to know whether there is something in the Plan and/or our bylaws that actually allows for regular checking and enforcement of the Hybrid designation's application in areas that have been settled.

I have spent some time visiting relatives in Glen Arbour (Hammonds Plains), for example, and it is evident that some residents have slowly, over time, begun to disregard the designation applied to their properties - there are people who have cut down trees and planted lawns in what is supposed to be a naturalized portion of their lot, as well as building infrastructure right down to the water's edge instead of respecting the riparian buffer zones.

It is all well and good to require a developer to respect a Hybrid Conservation Design when developing an area- but what is HRM doing, and what will it do in the future, to ensure these designations are held up in the long term by property owners? If this can't be ensured, then I think it's better to go with protecting communal lands in the community (i.e. the other two conservation designations).

HOUSING AFFORDABILITY

While recognizing that affordability is largely the province's domain, I still feel the City can and should be doing more than what is laid out in the draft plan to promote the development and long-term sustainability of affordable units.

First off, I must say I am glad to see section S-34 and S-37 included, but I wish they were stronger - rather than simply "investigating" ways of giving incentives, tax breaks or waiving fees for developers of affordable housing, I would like to see HRM commit to doing these things! As far as I understand these mechanisms are already in place in other cities (such as Ottawa?) so I am uncertain as to why we cannot commit to them here in HRM right now.

*I would also like to question the idea of "density bonusing" for affordable units. I feel this is weak. Rather than rewarding developers for providing affordable units, I would like to see HRM **require** that all developments over a certain size include a percentage of affordable units. Is it not true that Winnipeg is undertaking this approach?*

If the City plans to take part in future affordable housing initiatives, then I think they should also be more specific and clear about how these affordable units would be priced, and how they will be managed: I have heard some disappointing stories about supposed affordable units that have been included in developments here in HRM already, and what has happened to them as time goes on (either they stop being affordable over time, or they were never really affordable in the first place, just "relatively" affordable compared to the other units in the building).

ROAD NETWORK PROJECTS

I would like to state that I am strongly against any new major and expensive road infrastructure projects that are geared to improving traffic flow in HRM. I had hoped that this forward-thinking, smart-growth-focused, environmentally sustainable-oriented plan would have done away with plans for road widenings and additional bridge crossings!

How do we expect people to be motivated to switch to transit and active transportation if we continue to make their driving experience better and easier? I think it is a good thing that the bridges are clogged with cars during rush hour - it provides an incentive for commuters to seek alternatives. Also, clearly the more money we spend on road infrastructure (and these are very expensive projects we're talking about!), the less money is available to invest in a world-class transit system and top-notch active transportation infrastructure.

I would also like to comment specifically on section T-12-I very much disagree with the premise that we "must" control congestion to ensure it does not surpass existing levels. Yes, it is clear that Halifax's population will grow. But just because we will welcome more people to HRM does not necessarily mean we need to welcome more drivers: please let's leave the roads as they are, and allow them to get more congested!

It is my belief that people will only take a serious look at where they live and where they work and how they will travel between these places if they know congestion is a major issue. Even if we make cycling and transit infrastructure better, if we also make road infrastructure better than driving will continue to remain the preferred option - it's door-to-door, you don't get sweaty or wet, and you can travel exactly on your own schedule.

Please remember: "If you build it they will come". So let's not build it (more roads), and then our would-be drivers will be forced to find other options!

In particular, and for the reasons outlined above, (plus a general desire to have only beautiful, quiet, unpolluted communities in HRM) I am against widening Bayers Road, Herring Cove Road, and Barrington Street. These roads are already loud, unpleasant and unsafe feeling - please let us not make them more so! If there is money to be used for widening, let us use it instead to make dedicated bike and bus lanes on those streets.

*I'd also like to say that I am **strongly** against a third harbour crossing from Woodside - it is hard to imagine how this could have anything but a negative impact on the beautiful south end waterfront! I currently live near the MacDonald bridge, and I lament every day that I cannot enjoy the waterfront in my end of town because of the infrastructure that blocks access to the water, and the horrible traffic noise and smell that makes walking over the bridge most unpleasant. I love to go down to the south end to enjoy the quiet waterfront and big open sky there - and it would break my heart to have a bridge or tunnel mar it in any way.*

TRANSIT AND ACTIVE TRANSPORTATION

I am a strong supporter of improved transit and active transportation infrastructure, and a strong supporter of greater investment in public transit and active transportation. The principles within the current draft seem to point things in the right direction, and I encourage you to give these parts even more "teeth", so that they have the best chance of being realized.

For example, right now you say that Transit Priority Measures "may be made". Why the "may"? Why wouldn't we commit to making them? Is it not widely recognized that these measures are a good idea if we want to have a world-class transit system?

ECONOMIC GROWTH

I felt a bit uncomfortable when I read section 5.1.6 - "Ensure that there are sufficient lands available around the harbour and in business parks to provide economic opportunities;" Is

this not a dangerous phrase, all by itself? To me, it sounds like it could be used to trump other objectives of the plan. I would like to see this objective be balanced with a counter-phrase - for example, something like, "while ensuring that x% of the harbour remains accessible to residents for recreation and active transportation, and while ensuring that business park lands do not encroach on any designated Greenbelt areas"

I am cautiously supportive of your 5.3.4 provision to potentially allow residential developments in business parks - especially if this would help create business parks that are more pleasing, walkable etc. However: I think it would be a real shame to have people living in ugly and un-walkable communities just because someone thought money could be made by sticking some housing in there. So I wonder if the plan needs to be a bit more forward thinking with respect to residential development in business parks: I propose that the plan should do more to encourage smart, walkable, aesthetically pleasing development in new HRM Business Parks right now, whether people are living there or not - and that way you have insurance if, at some point in the future, people do end up living there!!

5.3.5 - HALIFAX HARBOUR DESIGNATION

It would be nice to see something, in the section about industrial uses on the harbour, about provisions for public access and active transportation infrastructure on any new industrial sites.

I think it is such a shame that so much of the harbour in the north end and MSVU area is completely inaccessible - except for Africville (which is miles away from the heart of the North End), there is not even a small park where residents can go down and sit admire the view and enjoy the waterfront.

In addition, it is frustrating to see how the extensive shipyard and military developments in the north end seem (as far as I can tell) to mean no reasonable possibility for an active transportation corridor there. This is a real shame, because going along the water would be such a great way to travel by bike from south to north on the peninsula (and even beyond that, into Bedford!).

Therefore, would you consider putting in another bullet in the Halifax Harbour Designation section, that stipulates that whenever new industrial lands are created on the harbour, there should be an allowance for small public access points (e.g. little waterfront parkettes) and also the provision for an AT trail to run through the property?

REGIONAL CENTRE

I like the guiding principles for the regional centre. They are all excellent - thank you! Now please I ask you, once again, to carefully look at all the provisions in the plan, and honestly assess whether there are enough "teeth" in the plan as it stands right now to ensure that these principles can be implemented successfully. Thank you!

Finally, there are two important elements of the Plan that I think are missing.

I hope you will consider including both these items:

URBAN NATURALIZATION

I would dearly like to see something added to the plan to promote the creation of more naturalized spaces in areas of the regional centre where such features do not currently exist.

In the south end, residents have access to Point Pleasant Park as a naturalized area where wildlife and native vegetation thrives. But residents in the north end (particularly the area between the Citadel and Yonge St) have no such an area. And although Point Pleasant is very wonderfully large, naturalized areas can also be small!!

I appreciate that we do have a few little parkettes scattered here and there with lawns and play structures - but it would also be wonderful to have little "nature parkettes" which would serve as wildlife habitat (especially for native songbirds and insects and wildflowers - and possibly amphibians?), and as a place for urban children to connect with nature (this has been shown, in recent research, to be very important for healthy development!), and for all residents to enjoy. (For example, when I'm taking care of kids it's nice to bring them to the playground.. but when I'm on my own I'd rather have a beautiful naturalized area in which to sit!)

*I think that if we want to have a really environmentally sustainable city, and a really beautiful city, then we should work to **bring nature into the city**, as well as creating greenbelts of protected areas outside of the urban core.*

NO MENTION OF IDEAL CITY SIZE (POPULATION)

In section 5.1.1, we say we want to build a regional centre that will encourage more people to move here. But how many more people? 50,000? 100,000? 500,000??

I am concerned that there is nothing in the draft plan about our collective vision for HRM, in terms of population size. One of the reasons I have chosen Halifax as my home is because it is a relatively small city, at 400,000. There are many attributes related to its size that I greatly appreciate, including, but not limited to:

- *The relatively direct democracy (my councillor knows who I am and I can get an answer from her within two days if I need information; At a public consultation meeting, everyone can have an opportunity to speak);*
- *The "small-town-feel" (it is easy to get to know people and you always run into folks you know on the street);*
- *The walk/bike-a-bility (most places are very easy to get to via foot or bicycle, because it's a relatively small city - taking public transit is also quick and easy, most of the time);*
- *The outdoors and wilderness access - (because it is a small city it is quick to get out of it, either by bike, bus or in a car - unlike Toronto or Hamilton or Montreal where you feel trapped inside the City limits!)*

For these reasons and others, I very much appreciate the fact that Halifax has a population of only 400,000. I have no desire or interest in living in a City of 600,000 plus ... I have done this before - and once a City reaches that size, one begins to lose all the elements outlined above.

*Therefore, I was a bit concerned about the projections of Halifax growing to half-a-million. I feel uncomfortable about the way that this appears to be seen as a totally **passive** process. . .*

*Rather than allowing growth to passively happen, I am very interested in the idea of a City **engaging in a meaningful and purposeful conversation about HOW MUCH we want to grow.** I would like our citizens to get together to discuss their ideal city size! What do we like about the size we are now? What will change if we grow bigger? What advantages and disadvantages will growth bring, and at what point (if any?) will Halifax lose its essence, if it grows too much?*

*Although rare, there **are** examples of communities who have had this sort of discussion and then put measures in place to limit growth to the size they collectively agree upon. There is an example north of Calgary I was told about once, but unfortunately I can't remember its name - however I did find this very interesting case study of a town in California: http://www.howmany.org/stewardship_Petaluma.php*

*I would **really** like to see, in this version of the plan, at least one small paragraph about planning our target population size, rather than just helplessly fluttering our arms as the city grows (or shrinks!). Could we not put in a paragraph that states the need to have a discussion about this, and set the wheels in motion for considering this in 5 years' time at the next planning review?*

Thanks very much for considering my views,

And thanks again to the planners and the committee for all their hard work!

Sincerely,

Katherine Kitching

-End Attachment-

Reference # 3.6

July 18, 2013

Ms. Dale Godsoe, Chair
Community Design Advisory Committee
Halifax Regional Municipality
PO Box 1749,
Halifax N.S. B3A 1L5
(via email – PlanHRM@halifax.ca)

Re: Regional Plan Comments – Draft 2, RP + 5

As a large land owner in the Cole Harbour area I had been active in the original HRM Regional Plan process in 2006, and have just recently reviewed the proposed changes being put forth during the RP + 5 process.

Firstly I would like to say that the Regional Plan was 25 year plan on how to shape our Municipality, which will take some time. The initial growth targets of 25 / 50 /25 were balanced growth targets and more time needs to be provided to achieve them. Restricting certain “types” or forms of development is not the way to meet arbitrary goals set in 2006. People need choice and if the downtown is to be vibrant and attract people and growth, make it easier through process and density bonusing to achieve this. There are certain portions of the RP+5 that impact me and my landholdings directly and I will focus on them here.

Chapter 3 Settlement and Housing

The return of the Shearwater DND lands to the Federal Government has impacted the vision of a connector road between Caldwell Road and the 118 Highway.

This transportation link is important to many traffic issues that we face today and HRM staff should more aggressively seek the co-corridor to make this connection a reality. In order to help fund such a project expand the service boundary and the Morris Russell Lake Master Plan area to help recover the cost through a CCC charge. With the current 60 million dollar expansion / upgrade to the Eastern Passage Sewage Treatment Plant, the area is well suited for growth and development. The plan needs to be written to incorporate this vision and have flexibility to address these types of growth scenarios. The interchange built at Highway # 118 exists with a dead end connection, significant investment has been made in the sewage treatment plant, and HRM must do their part and finalize the deal with the Federal Government and get the road built.

A.J. Giles Investments Limited

799 West Lawrencetown Road, Lawrencetown, NS B2Z 1S7
Phone (902)-435-0797 Cell (902) 448-2291
email – janice.bayers@datagroup.ca

In the case of my lands, 40 +/- acres is fully capable of being serviced by water, the sewer service is literally on all sides of the property and runs right through it on Atholea Drive yet we cannot connect to the sewer. If the service boundary was expanded to just include the existing Atholea Drive, it would generate tax dollars for HRM to pay for the current snow plowing, garbage collection and maintenance of the street. Instead the choice by HRM and staff is to provide these services anyway and miss out on the opportunity to collect increased tax dollars from development. This small little change makes great fiscal sense for the HRM, but to invoke such an expansion to the service boundary has been a huge struggle for my family since the 1980's .

I currently have significant money invested in an "Open Space" development application for my properties, PID # 40110157 and 40400624 referred to as HRM Case # 17023. While I don't agree, with the proposed changes to the Open Space Design, my current application should not be subject to any changes that may come out of the RP+5 processes. Based on the current rules I feel that my existing application should be allowed to be developed at 1 unit per 4000 sq. m. on the Classic Open Space Design and 1 unit per hectare on the Hybrid Open Space Design with no additional restrictions as it relates to the number of lots. Environmentally sensitive lands, including riparian buffers, wetlands, slopes in excess of 30% and flood plains are not to be excluded from the density calculation.

It should be recommended that a further increase in density should be given to any Open Space Development in the Classic Design form, beyond the 1 unit per 4000 sq. m. as an incentive to move away from the Hybrid Design. In the classic form there is less cost to the HRM for services such as garbage snow plowing road maintenance etc. as it is paid for by the condo corporation. HRM Planning staff needs to have an open mind, and encourage such things in development projects.

Chapter 8 – Municipal Services

The mandating of underground power in new developments suburban or rural should not be. New developments have very reliable power systems due to the existing rules in place by HRM and NSP as it relates to easements, low growth trees etc. Start in the downtown, and place power lines underground where the trees and vegetation are an issue with power outages. Mandating underground power will only increase the cost of housing and development putting the dream of many first time homebuyers more out of reach.

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email – janice.bayers@datagroup.ca

In closing I appreciate the opportunity to provide comments on the RP + 5 amendments, hope that all committees, HRM staff, Councilors and the Mayor take the comments of all to allow for a balanced approach to the future growth of the HRM and provide a housing and settlement choice for all.

Regards,

Original Signed

Janice Bayers
AJ Giles Investments Ltd.

cc. Municipal Clerk (clerks@halifax.ca)
Councilor Nicoll (lorelei.nicoll@halifax.ca)
Councilor Karsten (bill.karsten@halifax.ca)

A.J. Giles Investments Limited

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Reference # 3.7

From: Elaine Bennett

Sent: July 16, 2013 2:33:44 PM (UTC-04:00) Atlantic Time (Canada)

To: Regional Planning Office, HRM

Cc: Adams, Stephen

Subject: Proposed Regional Plan (RP+5)

Dear Sir/Madam,

I am writing to provide input for the proposed Regional Plan (RP+5) document and, in particular, to raise my concerns that RP+5 heavily favors the interests of developers, rather than protecting the best interests of HRM taxpayers and preserving our urban wilderness areas (such as the Purcell's Cove/Williams Lake Backlands).

Specifically:

1) Clause G-16 is an overt loophole designed to be exploited by developers and removes protection for our Urban Reserve lands. **Clause G16 must be deleted.**

2) The Stantec Consulting report, provided to HRM Council, recommended **a growth target of 50% urban, 25% suburban and 25% rural**, in order to save the city \$3 billion over 18 years. Council should act in the best interests HRM taxpayers, heed this advice, and incorporate this as an **accountable** target in the RP+5. **The 25% urban, 50% suburban and 25% rural development target must be deleted.**

3) **The concept of "greenbelting" should be clearly defined in RP+5 and specific areas of HRM should be protected from development under this designation.** In particular, the Purcell's Cove/Williams Lake Backlands should be a protected corridor, designated as a greenbelt area, that should be completely off-limits to development.

Sincerely,

Elaine Bennett

Reference # 3.8

Terry Casavechia
279 West Lawrencetown Rd
Lawrencetown, NS B2Z 1S4
902-434-4521
mjecas@gmail.com

July 10th, 2013

PLAN HRM
Halifax Regional
P.O. Box 1749
B3J 3A5
Attn: Susan Corser

Dear Susan:

On behalf of my family and other family landowners in the HRM I am writing a request for an amendment to the Halifax RP5 Regional Plan Review.

The request should exempt the family lands from the regular subdivision HRM rules. One should be able to remove a portion of an existing lot along with the house or cottage, which may occupy it. The remaining portion of the original lot could then be divided among the family of the owner.

It should be noted that the Province of Nova Scotia does not collect Deed Transfer Tax on family lands.

I think this amendment would help the citizens of the HRM and my region of the Eastern Shore to protect the lands and the heritage of those lands, to help settle estates and for estate planning prior to death to settle wills.

I would welcome an opportunity to go before your planning review committee or the HRM Council to explain how this very matter has taken 3 years of my time, starting in August 2010 until June 2013, to separate and try to keep family resource lands.

Lets work together to plan for the future of HRM families, living better in HRM!

Thank You,

Original Signed

Terry Casavechia

Reference # 3.9

Dear RP+5 staff and HRM Councillors,

Thank you for representing us. I am writing to comment on the proposed Regional Plan (RP+5) document. I have grave concerns that RP+5 heavily favors the interests of developers, rather than representing the best interests of HRM residents, children and taxpayers. I strongly support the preservation of adequate urban wilderness areas and, in particular, the Williams Lake/Purcell's Cove Backlands.

Specifically:

1) Clause G-16 removes protection for our Urban Reserve lands. Deliberations with current hopeful developers on Urban Reserve lands in the Williams Lake Backlands have made it clear that this clause negates any protections provided by the zoning designation Urban Reserve. As you know, if this clause were to be consistently used throughout the HRM, there would be no 'reserve' at all. One by one, properties abutting developed lands would each fall into the category of exception as per Clause G16 until the term Urban Reserve became totally meaningless. **Clause G16 must be deleted.**

2) Council should act in the best interests HRM taxpayers, heed the advice provided in the commissioned report by Stantec Consulting, and incorporate those recommendations as an **accountable** target in the RP+5. **The development growth target of 50% urban, 25% suburban and 25% rural must be adopted to save the city \$3 billion over 18 years.**

3) A greenbelt is more than 'open space' - it is a concept that has definition and purpose. The RP+5 fails to define the concept and therefore makes the use of the term meaningless. The Williams Lake/Purcell's Cove Backlands should be designated as a part of the HRM Greenbelt and should be completely off-limits to development. **The concept of "greenbelting" should be clearly defined in RP+5 and specific areas of HRM should be identified and protected from development under this designation.**

Best,

Paul Cashman
Halifax

Reference # 3.10

Dear Sir/Madam,

I live near Purcells Cove Road and moved out here from the South End to be near the woodlands.

I am writing to to raise my concerns that RP+5 heavily favors the interests of developers, rather than protecting the best interests of HRM taxpayers and preserving our urban wilderness areas such as the Williams Lake Backlands. Halifax has the opportunity to be a special city, such as Minneapolis, which provides wonderful green spaces for everyone. **The concept of "greenbelting" should be clearly defined in RP+5 and specific areas of HRM should be protected from development under this designation.** In particular, the Purcell's Cove/Williams Lake Backlands should be a protected corridor, designated as a greenbelt area.

The Williams Lake Backlands should be completely off-limits to development.

Unfortunately, clause G-16 is an overt loophole designed to be exploited by developers and removes protection for our Urban Reserve lands. **Please delete Clause G16.**

Please remember that the Stantec Consulting report, provided to HRM Council, recommended **a growth target of 50% urban, 25% suburban and 25% rural**, in order to save the city \$3 billion over 18 years. Council should act in the best interests HRM taxpayers, heed this advice, and incorporate this as an **accountable target** in the RP+5. **Please delete the 25% urban, 50% suburban and 25% rural development target.**

Sincerely,

Christie Cashman

Reference # 3.11



Dale Godsoe, Chair of the Community Design Advisory Committee

July 18, 2013

Dear Mr. Godsoe,

The eight business improvement districts of HRM are dedicated to serving the commercial interests of the region's traditional downtowns and main streets. Collectively, we represent more than 30 per cent of HRM's total commercial assessment.

The goal of the Regional Plan is to direct growth in an economically viable and sustainable manner. While the Regional Plan sets out clearly defined objectives and guidelines for residential development, it lacks provisions for directing commercial development and preventing commercial sprawl.

We are concerned that large tracts of commercial space are developed without consideration for how that development impacts existing commercial districts. New commercial space in HRM is being filled, to a large extent, by drawing retailers and offices out of existing commercial space, rather than attracting new businesses. This hollows out existing commercial districts.

Commercial sprawl comes at a high cost to HRM. Developing new commercial space means paying to extend municipal services such as transit and taking on the burden of maintaining infrastructure. If new commercial space is developed at the expense of existing commercial districts, HRM is only adding to its maintenance costs without bringing in new revenue.

The Regional Plan states that residential development should make the best use of existing infrastructure and avoid unnecessary expense. We believe the same objectives should apply to commercial development. We would like to see Council develop a coherent plan for commercial development that considers the impact on existing commercial districts in HRM and ensures that new development is sustainable.

Sincerely,

Michelle Champniss
Executive Director

cc Mayor Mike Savage
Councillor Steve Craig
Councillor Brad Johns
Austin French, Manager of Planning
Jane Fraser, Director of Planning

Reference # 3.12

Chester to Chebucto Transportation Working Group

Submission to the Halifax Regional Municipality

On the Regional Plan Five Year Review

July 17, 2013

1) Background on the Chester to Chebucto Transportation Working Group

The Chester to Chebucto Transportation Working Group was formed in May of 2012 to follow-up on discussions on the theme of transportation held at the Village Forum IV hosted by the St. Margaret's Bay Stewardship Association (SMBSA) on June 25, 2011. The Transportation Working Group was initiated after discussions with Denise Peterson-Rafuse, MLA for Chester St. Margaret's and Peter Lund, HRM Councillor for what was District 23 at the time. It was agreed that a representative of the St. Margaret's Bay Stewardship Association would Chair the Transportation Working Group.

The geographic scope of the Transportation Working Group is from Chester in the west through the Aspotogan and Chebucto Peninsulas to Prospect Road in the east. The membership is composed of representatives from government, community, business, and recreation organizations that have an interest in enhancing and developing a range of transportation options.

The four purposes of the Transportation Working Group are:

1. To monitor and support the current initiative by the St. Margaret's Bay Community Transportation Society (BayRides) to develop a community based transportation system.
2. To explore the feasibility of addressing current and future commuter transportation needs through public transit.
3. To identify economically and environmentally sustainable transportation initiatives needed to promote economic development for tourism, business, and recreation.
4. To develop a strategic framework to enhance active transportation.

2) Process for Providing Input to the HRM Regional Plan Five Year Review

The following Section 3 providing input to the 5 Year Review of the HRM Regional Plan has been generated through discussion at a meeting of the Transportation Working Group held on May 22, 2013. The discussion at the meeting focused on Chapter 4 on Transportation within Draft 2 of the Regional Plan. David McCusker, Manager of Strategic Transportation Planning, HRM was present at the meeting to review the Chapter with us and answer questions. His presence was very helpful and contributed greatly to our ability to give informed feedback and input to HRM. Matt Whitman, HRM Councillor, District 13 was also present at the meeting as a standing member of the Working Group.

The other Transportation Working Group members who participated in the meeting on May 22 were:

- Cathy Crouse, Chair, St. Margaret's Bay Stewardship Association
- Kathy Gamache, Executive Director, Aspotogan Heritage Trust
- Peter Lund, Resident
- Rod Shaw, St. Margaret's Bay Community Transportation Society
- Gordon Tate, Active Transportation Coordinator, Municipality of Chester

3) Input to RP+5 on Chapter 4: Transportation:

4.0 Introduction

The first sentence of the introduction states *"An effective regional transportation system links people and communities with each other and with the goods, services and employment opportunities they seek, in an environmentally sensitive and fiscally responsible manner."*

- The Transportation Working Group agrees with this statement and is particularly pleased that recognition is given to environmental factors.

4.1 Objectives

The four statements of objectives for Chapter 4 on Transportation are excellent, with the following recommendations:

- Community based transportation could be specifically identified as a travel mode in the first objective, rather than being subsumed under *"other viable alternatives to the single occupant vehicle"*.
- The fourth objective states *"Design complete streets for all ages, abilities, and modes of*

travel.” David McCusker clarified that complete streets are designed to be safe to all users, e.g.: pedestrians, bicycles, wheelchairs, cars, etc. The Transportation Working Group supports this concept and proposes that this objective should be equally applied within rural areas of HRM, particularly along major roads which serve as the ‘main street’, linking businesses and residences in many of our communities.

4.2 Demand Management Strategies

4.2.1 Transportation Demand Management

T-1 states that *“The Halifax Transportation Demand Management (TDM) Functional Plan (Boulevard Transportation Group Ltd. June, 2010) shall provide guidance for future strategies and programs to further the transportation objectives of this Plan.”* David McCusker informed us that the TDM Functional Plan is on the HRM website and provides the foundation for the illustration in Figure 4-1 which identifies a hierarchy of actions representing a diversion strategy to move toward less dependence on cars. The three levels of Functional Plans are regularly reviewed with public input.

Figure 4-1 identifies Smart Trip at the first level of demand management. David explained that Smart Trip is a program to encourage workplaces to support employees to use transportation modes other than private vehicles. For example, an employer can guarantee that employees will be able to get home or to another work location if the need unexpectedly arises during the day. This can be done through the provision of taxi chits. Another option is for the employer to provide a subsidized bus pass on an annual basis.

- The Transportation Working Group supports the purpose of the Smart Trip Program and recommends that HRM adopt the program internally to advance the program’s objectives and to provide a role model to other employers.

4.2.2 Active Transportation

T-2 references the Active Transportation Plan approved in November 2006 and states, *“consideration shall be given to revisions to this Plan”.*

- The Transportation Working Group supports a consultative process to review the Active Transportation Plan. It is particularly important that the Active Transportation Plan not be focused primarily within the urban core of the region, as AT is equally important in

suburban and rural areas.

T-3 states that *“Decisions regarding the use of limited public-street and sidewalk space shall encourage the use of public rights of way by pedestrians, bicyclists, and public transit, and shall strive to improve public health and safety”*.

- Map #3 on the HRM Website indicates that there is an Active Transportation corridor in our area that is the Rails to Trails, rather than a bike lane along the major roads. The Rails to Trails network is a wonderful AT option but is primarily recreational. Active Transportation routes that link residents to shopping and employment areas also need to be developed, and the community should become actively engaged in the process of identifying the most viable areas. An obvious area to target would be the corridor between the Tantallon Crossroads and the Hubley Centre at Exit 5, which contains both schools and places of employment.

T-4 refers to the development of “greenways”. David McCusker clarified that a greenway is not a greenbelt of protected natural green space, but is a term used for active transportation corridors (which are environmentally desirable and hence green). The objective is to ensure that greenways are not developed in isolation from each other, and that they actually serve a functional purpose.

- As T-4 included the first reference to the term “greenways” in Chapter 4 of Draft 2 of the Regional Plan, it would be important to have a definition of this term imbedded in the text of T4.
- The Working Group supports goal T-4 and would want to be actively connected to planning for greenway development in our area.
- Transportation Working Group members who have traveled nationally and internationally have taken note of efforts in other major cities to establish bike lanes and greenways. For example, existing two-way streets can be converted to one-way streets with a bike lane separated by a concrete median. The other observation was the increased use of mini-roundabouts within both urban core streets and rural traffic corridors. They slow down the speed of traffic (pedestrian and bicycle friendly), and eliminate the need for stop signs.

4.2.3 Public Transit

The first sentence of this section states *“Transit facilities and services are to be planned in collaboration with land use planning and community design with emphasis on serving the*

Regional Centre and Suburban Growth Centers". David McCusker explained that the rationale for this prioritization is economic in terms of the concentration of ridership, and geographic in relation to the distance between homes and designated stops.

- The Transportation Working Group acknowledges that the current Regional Plan priorities, and the economic model of taxation, do not support public transit in the rural areas of HRM. However, the alternative option of community based transportation requires a concerted effort by skilled volunteers to execute, which does not exist in all communities. We are fortunate that we have a recently formed organization in St. Margaret's Bay that has taken on this important and demanding initiative.
- There are viable models of public or private group transportation in third world countries. For example, buses stop when a person is standing by the road, and people get off at a point closest to their home or destination.
- In Canada the working model for public transit in rural areas is the school bus system, and this system is accessed by children of all ages, which demonstrates that "where there is a will, there is a way".
- Public transit in rural areas will become a more pressing need as the average age of rural residents and the price of gasoline continues to rise.

T-6 makes provision for the installation of public transit facilities in all zones with minor and major collector roads and "*such facilities shall not be subject to zone requirements*".

- The Working Group supports this provision and recommends that there be clear definitions of major and minor collector roads embedded within the Regional Plan, and that these definitions result in consistent and equitable servicing by all related HRM departments (e.g.: plowing and street lighting).
- It is important to ensure that "public transit facilities" encompasses not only bus stops and terminals, but also the provision of parking areas or parking lots. This is particularly important to encourage suburban drivers to leave their cars outside of the urban core. Some of the parking areas could be captured within existing commercial parking lots which are not full during the day, and this would have the added benefit of encouraging local shopping.

T-7 states "*The Urban Transit Service Boundary, illustrated in Map 7 [should be 7A] of this Plan, shall establish the area within which HRM will direct future investment in public transit services, with the exception of rural commuter express service which may be considered outside of this boundary*". The boundary is roughly equivalent to the area where water services are provided.

- As stated above at the beginning of this section, the Transportation Working Group will

continue to advocate that public transit is an essential service in rural areas of HRM.

- The Transportation Working Group agrees that the data contained in the Stantec Quantifying Study (2013) provides a convincing economic argument that HRM needs to ensure that we are not repeating the costly mistake of continuing to encourage or allow urban sprawl. Conservation design within rural areas can increase density by the use of “open space” development, which provides a shared septic system for a more closely spaced cluster of homes. With open space development there are a limited number of homes within the cluster, and therefore the dominant model of transit services, if it remains inflexible, will not be a viable option for rural areas. Creative thinking in relation to public transit in rural areas is required to address the looming transportation crisis in rural areas as the population ages and the cost of operating private vehicles continues to rise.

T-8 states *“Transit priority measures, such as designated transit lanes, transit signal priority, and queue jump lanes may be made to improve the reliability and speed of public transit vehicles”*.

- The Transportation Working Group supports these measures and strongly recommends that the dedicated lanes for buses be established as High Occupancy Vehicle (HOV) lanes to include cars carrying two or more riders, to further encourage car-pooling at no extra infrastructure cost.
- The use of reversing lanes in bottleneck areas (e.g.: Chebucto Road at the roundabout) is another means to facilitate the efficient flow of traffic for both public transit vehicles and commuters from rural areas.

T-9 states *“HRM shall strive for Transit Oriented Development within the Urban Transit Service Boundary through secondary planning processes, land use by-law amendments, development agreements and capital investments”*.

- The Transportation Working Group is of the view that planning should precede development, and that a proactive approach to identifying the strategies to support transit development should be taken through the secondary planning process. We also feel that this approach should not be limited to the provision of public transit services within the existing boundary, as similar proactive strategies may need to be implemented to support alternative forms of transportation such as community based transportation and active transportation.
- The focus of T-9 should be multi-modal transportation within all areas of HRM. As the Stantec Quantifying Study clearly demonstrates, the cost of suburban sprawl is not sustainable and our view is that transportation systems have to adapt to this reality,

e.g.: planning for land use that can accommodate measures such as park-and-ride locations connected to public transit or community based transit.

T-10 states *“Council may consider programs to encourage and assist communities with developing their own community based transit services in the areas outside the Urban Transit Service Boundary”*.

- The Transportation Working Group strongly recommends that the words “Council may” at the beginning of T-10 be changed to “Council shall”. The provision of community based transit services should be a joint municipal and provincial undertaking at both the levels of funding and the sharing of expertise. It is also important that the collaborative support provided by HRM to these initiatives be on an interdepartmental basis, and including Metro Transit.
- One of the current barriers to efficient community based transportation is the provincial rule that community based transportation cannot be provided on a fixed route basis (public transit model), but this may be the most feasible and efficient delivery structure as it is with public transit.
- Because the rural areas of HRM do not pay into the Urban Tax Rate that funds public transit, there is an argument that rural areas should not have access to public transit and that the municipality has no obligation to fund the alternatives. However, other municipal jurisdictions in NS have used the federal Gas Tax for this purpose, although the federal government does not support this use of the Gas Tax.
- A possible mechanism for funding community based transportation through the municipality would be to use funds derived from the parking permits sold within restricted neighbourhoods to individuals who live outside of the parking area (people who are generally commuters from outside of the urban core).

4.2.4 Parking

T-11 states *“The Regional Parking Strategy Functional Plan, approved by Regional Council in 2008, shall provide guidance for strategies and policies to increase the efficiency of the existing parking system, reduce parking demand and advance related transportation objectives of this plan.”*

- The Transportation Working Group supports the intent of this statement to increase the efficiency of parking systems, and recommends the exploration of shared parking arrangements. For example current daytime parking restrictions could be modified to ensure that the schedules of various users could be accommodated, e.g.: daytime parking permits for commuters in recreation centre parking lots which are less full

during the day. This addresses parking demand without increasing parking space supply.

4.2.5 The Road Network Priorities Plan

The only project in the Transportation Working Group area of interest identified in Table 4-1 outlining Road Network Projects is Highway 113 providing a highway connection between Hwy 103 at Hubley and Hwy 102 near Hammonds Plains Road. Highway 113 is identified as *“Future Potential - projects which have been identified to be constructed beyond the 25 year horizon of this Plan”*. It is noted that this is a *“Provincial project with environmental impact assessment complete, but not yet programmed.”*

- The Transportation Working Group does not have a position on this project which is not on the immediate horizon, other than the general sense that building more highways is not consistent with an environmentally sustainable plan, nor the best use of the province’s limited financial resources.

T-12 states *“A Road Network Priorities Plan will be developed to account for all mobility demands not anticipated to be accommodated by modes other than vehicle. The plan will determine where vehicle capacity is required to meet demand and to prevent existing congestion levels from increasing”*.

- This goal sounds good but the first sentence could be more clearly stated.

T-13 relates to the ability of HRM to establish Transportation Reserve zones, which expire after 5 years if the plan is not executed.

- The Transportation Working Group supports the process of long range planning for transportation and recommends a mechanism to renew or extend the five-year time frame for Transportation Reserve zones.

4.3 Street Design

T-14 states *“Municipal service design standards for streets shall be reviewed from time to time to ensure that the streets are designed for all ages, abilities and modes of travel and reflect the character of the community in which the streets are located”*.

- The Transportation Working Group strongly supports this goal and recommends that a framework to define related standards be developed, and a process to engage the community in a regular system of auditing the standards.

T-15 gives the HRM Development Officer and Engineer the authority to deny a development that would increase traffic loads within the area to an unsafe level.

- The Transportation Working Group strongly supports this statement, which is in the best interests of public health and safety.

4.4 Regional Coordination

T-16 relates to the functioning of the *“Strategic Joint Regional Transportation Planning Committee established with the province to implement the transportation aspects of this Plan”*.

- The Transportation Working Group supports the statement within T-16 that *“Consideration may be given to revising this governance model to better reflect the needs and opportunities of each level of government”*. One model that we suggest is worth exploring is the TransLink Authority that has been developed in the Greater Vancouver Area.

4) Chester to Chebucto Transportation Working Group Ongoing Interest

The Chester to Chebucto Transportation Working Group provides a forum for ongoing discussion with HRM on the development of infrastructure to support multi-modal transportation options within a rural area of the region. We will be reviewing with interest the final version of the Regional Plan, will monitor progress on transportation goals and associated functional plans, and will participate in future consultations on transportation themes.

Thank you for the opportunity to provide input to the Five Year review for the Regional Plan. If there are any questions concerning this submission, you can contact me at 225-7119 or cathycrouse@eastlink.ca.

Respectfully submitted by:

Cathy Crouse, Chair
Chester to Chebucto Transportation Working Group

Reference # 3.13



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July 19, 2013

Mrs. Dale Godsoe, Chair
Community Design Advisory Committee
Halifax Regional Municipality
P.O. Box 1749, Halifax NS B3A 1L5

Dear Mrs. Godsoe:

Re: Observations and Recommendations – RP+5

Clayton Developments Limited has had the privilege of developing several “master planned” communities throughout HRM since 1959. Through close consultation with municipal staff and a staunch commitment to community engagement, we are proud of the fact that nearly 65,000 residents of HRM live in a Clayton community.

Our developments span the HRM horizon. In the former County of Halifax, we have been fortunate to develop both Colby Village and now, the final phases of Colby South. In Dartmouth, we have enjoyed working with community stakeholders to develop both Portland Hills and Russell Lake West. Halifax has been home to both Clayton Park and Clayton Park West. In Bedford, we continue to develop *The Ravines of Bedford South* and *The Parks of West Bedford* via our joint venture company, West Bedford Holdings Limited.

Our purpose in drawing attention to these developments is that they are all the product of extensive planning processes undertaken by HRM (or its predecessors); close consultation with community stakeholders; and approved planning strategies, including the Regional Plan. Looking back, we firmly believe that these communities have made a positive contribution to HRM as a whole by providing a wide variety of housing and employment opportunities, commercial and institutional facilities, and important park and open spaces. Equally important, these walkable and transit friendly communities have enhanced the municipality’s tax base without undue impact to servicing costs.

Support for UDI Submission

Clayton has been a member of the Urban Development Institute for over 25 years. We have had an opportunity to contribute to UDI’s review and commentary relating to the proposed RP+5. Simply stated, we are supportive of the comments and recommendations provided by UDI. As such, we urge both CDAC and HRM staff to carefully consider the genuine interest of the development industry and our overall desire for a balanced yet sustainable regulatory environment.

Growth Targets

We support staff’s commitment to maintaining the 25-50-25 settlement strategy. While some have suggested that the settlement targets have not been met, we respectfully suggest that judgment not be passed on the first five years of the Plan, but on the strategies that will drive growth as defined by the 25 year time horizon.

In our opinion a 40 - 50% growth target for the Regional Centre is not realistic. As indicated in the Stantec report, there is physical space in the Regional Centre for only 804 low-density residential lots. Consequently, 30,000 – 37,000 apartment/condo units will be required in order to achieve the 40% and 50% growth targets, respectively. This equates to an average of 1,200 – 1,480 units per year over the lifespan of the Plan.

According to CMHC statistics, the whole of HRM has averaged approximately 1100 apartment/condo starts per year for the last ten years. More recently, there is evidence that the multiple market is becoming saturated. This being the case, it is highly doubtful that market conditions and investor interest will change so dramatically as to result in the number of apartment units required to meet these targets.

Based on our extensive experience with land development, there is neither the market demand nor the physical space to facilitate such extraordinary activity in the Regional Centre. This being the case, Council should not be seen to be legislating settlement policy in a manner that has no chance of reaching realistic objectives. *Stay the course – focus on a balanced approach to growth that is realistic and sustainable for the whole of HRM.*

Downtown vs. Suburbia

The current debate about downtown vs. suburban/rural development is counter-productive to developing a cohesive regional municipality where all citizens feel welcome. Indeed, downtown Halifax has seen better days and the current state of affairs is totally unacceptable to all residents of HRM. However, the key to revitalizing the downtown does not lie in preoccupying oneself with undermining development in the suburbs. Rather, success will come from developing a proactive and sustainable strategy that will generate positive results for the urban core.

Section 6.4 of the RP+5 provides for the creation of a “Centre” Plan. In our opinion, this strategy is long overdue – furthermore, more effort should have been made developing the Plan over the past five years. Nonetheless, the time has come to articulate a performance based strategy that:

- *Sets realistic growth targets for the City Centre.* These targets should be based on sensible market forecasts, land ability, construction costs, and infrastructure support. Specific settlement targets should be identified for the urban core (i.e. the area bounded by North Street, Robie Street, and Inglis Street).
- *Generates more opportunities for residents of HRM to patronize the downtown.* The new convention centre will hopefully generate more tourists and conferences for the city. The new library is a welcome asset for the community. But what other cultural facilities and experiences are planned to entice existing residents to the downtown?
- *Continues to improve upon the planning and approvals process.* There is still considerable uncertainty in the process. Consider more as-of-right ability while protecting the integrity of existing neighbourhoods. Rethink the effectiveness of *HRM by Design* in terms of the current design/review process.
- *Creates incentives for “Brownfield” sites.* HRM lags behind the rest of North America relative to programs aimed at redevelopment of brownfield sites.
- *Impresses upon the Waterfront Development Corporation the need to expedite development of vacant parking lots on the Halifax waterfront.* WDC’s primary focus should be downtown

Halifax as opposed to infilling the Bedford Basin to compete with private land developers. The Bedford lands should be considered for open space, cultural uses, and a transfer hub for water taxis, fast ferries, and possibly light rail commuter opportunities.

It is interesting to note that the geographic boundaries of the “Regional Centre” act to define historically urban areas like Fairview, Clayton Park & Clayton Park West, Mount Royale, Royale Hemlocks, and Bedford South as “suburban”. Nothing could be further from the truth. These areas have been developed at densities that rival if not surpass many of the established residential neighbourhoods of peninsula Halifax and old Dartmouth. Combine with extensive commercial and institutional uses and these transit friendly neighbourhoods are the very definition of modern “urban” settlement.

It is also important to note that prior to amalgamation, Bedford was a recognized “town” with an emerging commercial core. Linear development that existed in the early 70’s had long been replaced with progressive settlement legislation, including a number of master plan communities. Today, the area is widely regarded as a full-service community that does not rely upon the Regional Centre for essential services.

That the HRM has not met its growth targets in the first five years has more to do with the delineated boundaries of the Regional Centre than actual development. Taking into account the many thousands of new housing units that have been constructed in the aforementioned areas, the “urbanized” component of HRM has performed very well.

As a major developer within the former City of Halifax, we take exception to areas like Clayton Park and Clayton Park West being classified as “suburban”. These developments have been designed as safe, walkable, and transit friendly neighbourhoods offering a variety of housing opportunities to new and existing residents of HRM. These communities are positive contributors to the municipal tax base. As such, they should not be subjected to a statistical comparative that suggests an underperforming approach to urban settlement.

Specific Recommendations

As indicated above, Clayton supports the comments and recommendations of the Urban Development Institute. In terms of our own landholdings, we respectfully request CDAC’s positive reflection on a couple of items.

Shearwater Connector

The Regional Plan makes reference to the completion of the Mount Hope Avenue extension to the Caldwell Road (Table 4-1: Road Network Projects). However, there is no specific language in the Plan that highlights the importance of this road connection relative to:

- Improving traffic congestion on Portland Street.
- Reducing traffic volumes on Caldwell Road while providing an alternate commuter route for area residents, including Eastern Passage.
- Allowing for additional development as contemplated by the Morris Russell Lake Secondary Planning Strategy.

Since 2005, many millions of dollars have been spent by various levels of government and private developers to complete construction of Baker Drive, the Highway 111/Mount Hope Avenue interchange,

and Phase 1 of the Mount Hope Avenue extension. As part of our Russell Lake West Development, Clayton has invested over \$6.0 million as part of its contribution to what was intended to be a comprehensive infrastructure plan linking Highway 111 to the Caldwell Road via the “Shearwater Connector”.

Our specific contributions have included:

- Oversizing Baker Drive to four lanes.
- Construction of Mount Hope Avenue from the Mount Hope Avenue Interchange to the intersection of Baker Drive, including full signalization.
- Completion of over 1000 linear feet of the Mount Hope Avenue extension from the intersection with Baker Drive, eastward towards the Caldwell Road. As originally intended, this section of road does not provide access to abutting properties.

In 2007 and for reasons that have yet to be explained, the Department of National Defense elected to take back lands previously sold to Canada Lands Company Limited within the boundaries of the Shearwater airbase. With the loss of some 350 acres on lands that would have contributed to the Capital Cost Charges required to help finance the road, the Shearwater Connector was abandoned and the Morris-Russell Lake Master Plan steering committee was discontinued.

It is our understanding the HRM staff had previously identified a workable alignment for the connector road that does not impact operations of the airbase itself. However, without support of the Federal government, there is little to suggest that the road connection will be completed in the foreseeable future.

In recent months, Clayton along with other private property owners have met with local councilors, the Mayor, and senior staff in an effort to show support to renewing discussions on the Shearwater connector. Presently, there are several properties within the Morris-Russell Lake Master Plan area that cannot be developed without confirmation of the connector. Equally important, there are large pockets of undeveloped lands abutting Caldwell Road that could be rolled into the master plan area to offset the loss of lands originally intended for development by Canada Lands. This development would further the connectivity between existing communities of Cole Harbour and Eastern Passage.

We have expressed to HRM staff a willingness to include some of our landholdings along Caldwell Road in the master plan area in order to make the Shearwater Connector viable. Without these lands contributing to the CCC, the burden of existing property owners and the HRM will be too great.

The Mount Hope Avenue/Caldwell Road connector is a vital component to HRM’s regional transportation strategy. To this end, we respectfully suggest that:

- RP+5 Plan be amended to include specific language regarding the importance of the connector road in order to relieve traffic congestion on Portland Street and Caldwell Road. This should be tied to HRM’s five-year capital budget relating to road improvements (i.e. Table 4.1).
- Language be inserted into the Regional Plan that encourages all levels of government to work together (as they did for the Mount Hope interchange) to complete the connector road in a timely fashion. This is in furtherance to the co-operation displayed in the construction of the Mount Hope Avenue interchange.

- Provisions be made to include additional lands in the Morris-Russell Lake Master Plan in order to offset the loss of some 350 acres of land originally intended for development by Canada Lands Company. These lands should abut or be in close proximity to Caldwell Road and form a continuation of the “serviceable” boundary in the area of Morris Lake “north”.

We note that HRM is moving forward with the Port Wallace secondary planning strategy. We support this initiative as the greater Dartmouth area will soon find itself with few if any fully serviced subdivisions. However, it is also important that we not lose sight of the significant investments that have been made to date in the Morris-Russell Lake area and the need to complete the Mount Hope Avenue connector in a timely fashion. In our opinion, the eastern region of HRM requires several planned developments to help balance future settlement patterns.

Urban Reserve Designation

There is a fundamental and inherent inequity with the current restrictions associated with the Urban Reserve Designation. Specifically, the zoning that has been applied to lands within the designation restricts development to one home per an existing lot created in advance of the Regional Plan’s adoption in 2006. In our opinion, this is far too restrictive in light of uncertainties relating to the potential extension of municipal services.

Historically, the seven (7) areas identified as Urban Reserve under the current Plan (Section 3.2) enjoyed some level of development potential before adoption of the Regional Plan in 2006. Specifically, these areas could be subdivided to allow for development with on-site wells and septic systems. With adoption of the Regional Plan, development rights were extensively reduced without an appreciation of the negative impact on property values.

It would appear that the rationale for creating the Urban Reserve Designation was to ensure that sufficient lands would be available for serviced development in the distant future. In the meantime, existing development rights would be seized in the interest of a long-term planning objective. No compensation was paid for this reduction in historical development rights. Likewise, no specific promises were made as to the timeframe for serviced development.

HRM now finds itself in a position of stating there is sufficient serviced land to accommodate development over the next 30-40 years. We respectfully disagree with this position as witness by the fact that greater Dartmouth is essentially out of serviced lots for the next several years. Likewise, places like Timberlea/Lakeside/Beechville continue under a development moratorium until such time as a resolution is found to the Nine Mile sewer treatment plant. Nonetheless, if there is no stated intent to service these areas within the time horizon of the Plan, the ability to develop these lands with on-site wells and septic fields should be returned to the affected property owners.

It can be argued that the Urban Reserve Designation serves no useful purpose in light of the growing desire by some to compress serviced development with particular emphasis on increasing population in the Regional Centre. In its present state, lands contained in the designation are sterilized while abutting properties have the ability to develop with on-site services.

If council is not prepared to allow these lands to be serviced within the time horizon of the Plan, property owners should have the same rights as those in the Rural Settlement designations. Conversely, if there is a genuine intent to service these lands, they should be included in the Urban Settlement Designation. This seems fair in light of the fact development of such designated “master plan” areas such as Susie Lake (Highway 102 corridor), Sandy Lake, and Port Wallace has yet to be confirmed.

In the interest of fairness and the restoration of property values, we recommend that:

- Proposed Policy S-4 be amended to permit lands within the Urban Reserve Designation to be developed in accordance with either Option 1 or 2 as set forth in Table 3-4: Conservation Design Development Approvals.
- CDAC review the rationale behind the Urban Reserve Designation with the view to eliminating the designation and placing currently designated lands within either the Urban Settlement or Rural Designation.

We note that Draft 2 proposes to eliminate reference to Policy IM-18, which provides for consideration of serviced development of lands within the Urban Reserve Designation subject to a number of important planning and servicing considerations. In its place, proposed Policy G-16 provides similar developments where one designation abuts another.

We are aware of a concentrated effort by some to eliminate Policy G-16, referring to it as a so-called “loophole”. Policy IM-18 is not a loophole! It is a legitimate part of the Regional Plan and serves many important purposes, not the least of which is to mitigate the loss of substantial development rights that existed prior to the adoption of the Regional Plan.

Maintaining existing language with an updated reference to Policy G-16 is appropriate and fair to all stakeholders. *Eliminating the policy is an unwarranted attack on property rights for which affected property owners should take whatever action is appropriate to maintain or enhance the status quo.*

We respectfully request that:

Proposed Policy S-3 be amended to provide specific reference to proposed Policy G-16 to the extent that Regional Council can consider serviced development within the Urban Reserve Designation as stated in sub-section (d).

Lands abutting Purcell’s Cove Road

HMR staff is aware that our company owns lands in the vicinity of the Purcell’s Cove Road. Recently, Regional Council on the recommendation of Community Council terminated a study into the extension of municipal services to currently unserved areas of Purcell’s Cove and Purcell’s Cove Road. This had the effect of eliminating the potential for municipal water and sewer services to our landholdings as well as others in the area.

We are of the view that the Purcell’s Cove feasibility study was flawed in terms of its overall approach to technical studies, cost estimates, and public consultation. Anyone who attended stakeholder meetings would have noted the heavy bias by those who desire absolutely no new development in the vicinity of their homes. The fact that four members of the steering committee resigned amidst threats and personal attacks on individual’s integrity clearly demonstrates that the process was less than balanced and far from encouraging all point of view to emerge.

We respect that a number of area residents may not wish to pay for municipal water and sewer services, even if the cost of services can be reduced through additional development. *However, we believe that our lands along with a few adjacent properties can and should be considered for serviced development within the timeframe of the existing Regional Plan if it can be demonstrated that the cost of such services will be borne by the benefiting property owners; furthermore, that existing traffic congestion and servicing constraints can be addressed through proper planning programs.*

We note that existing Implementation Policy IM -9 (Clauses b and c) provides that the Five-Year Review of the Plan shall consider amendments:

- relating to substantive changes to this Plan and corresponding development regulations (Clause b); and,
- to alter a Designation or Centre (Clause c).

Clearly, the Regional Plan is designed to allow for changes in current Plan policy that were either overlooked at the time of adoption of the original Plan – or – are justified in the interest of fairness and progressive settlement patterns.

In terms of our landholdings, we draw your attention to the locational map forming Schedule “A” of this submission. The map is derived from an overall servicing map prepared by Halifax Regional Water Commission. The areas denoted in yellow are the areas currently contained within the Urban Settlement Designation.

Please note the proximity of our lands to the Regional Centre. *In fact, our landholdings are the largest parcel of undeveloped lands in proximity to the Regional Centre.* They are significantly closer to the Regional Centre than the proposed “master plan” areas, Highway 102 corridor lands and Sandy Lake.

Why these lands were excluded from the Urban Settlement designation at the time of adoption of the Regional Plan cannot be confirmed other than to suggest that the previous property owner did not request inclusion. Nonetheless, there are several reasons why consideration to Urban Settlement and a rezoning to (RDD) Residential Development District should be considered at this time. Specifically,

- The lands directly abut the Urban Settlement Designation to the immediate west.
- The lands are surrounded by existing development – i.e. established neighbourhoods of Williams Lake and Pine Bluff to the north; established homes and institutional uses along the east side of Purcell’s Cove Road; Oceanview Drive to the immediate south; and the emerging development of Governor’s Brook to the immediate east (please refer to Schedule “B”).
- The lands abut a designated “arterial” road – i.e. Purcell’s Cove Road.
- The area is serviced by existing Metro Transit (Route 15) – a transit route that has seen reduced hours due to lack of population and ridership.
- The area has schools with declining student populations.
- The lands can be serviced by and at the expense of the private property owners without undue impact on municipal finances.
- Servicing these lands will allow our property owners along a portion of Purcell’s Cove Road to receive municipal water and sewer services at substantial savings. There is no possible way for existing property owners to bear the cost of extending services.
- Extending municipal water further along Purcell’s Cove Road improves fire-fighting capability to the area.

- The lands are in proximity to the Herring Cove Road commercial corridor, which offers a variety of goods and services to existing and future households.

We acknowledge that many in the extended community of Purcell's Cove will be opposed to including these lands in the Urban Settlement Designation citing traffic, the environment, and general loss of open space as reasons to maintain the status quo. However, when we look at the lands objectively, we are hard-pressed to understand why the lands should not be considered for serviced development within the time horizon of the Regional Plan. In particular:

- *The lands were designated "Residential Development District" from 1989 – 2006 under the Mainland North Secondary Planning Strategy.* The designation provided for the eventual servicing of the lands with municipal water and sewer services. While the Regional Plan changed the designation, it did not change the intent to see the lands developed with municipal water and sewer services at some point in the future. We note that the same designation existed for the Highway 102 corridor lands that are presently designated Urban Settlement.
- *The lands have never been designated Park and Open Space.* It has been suggested that the lands form an important part of a green-belt, sometimes referred to as the Purcell's Cove "Backlands". While this may be appropriate for publicly owned lands further to the far south, it is inappropriate to refer to privately held lands as "Open Space". New development will allow for portions of the land to be deeded for public open space.
- *Constraints to development along Purcell's Cove Road are no different than other areas that are designated Urban Settlement.* Issues of traffic and road improvements, municipal servicing capacities, and proximity to wetlands and watercourse are not unique to our location. These are matters that are routinely addressed throughout HRM via the development approval process.
- *Including the lands in future upgrades to municipal services including transportation corridors allows a portion of the municipal investment to be recovered from growth.* Not including the lands in future development means required upgrades to existing infrastructure problems will be paid for by the existing taxpayers.
- *New development will have a positive impact on the commercial operations located along Herring Cove Road.* In the absence of new development, businesses are hard pressed to survive let alone grow.
- *Residential development in proximity to the Regional Centre reduces commuter times and greenhouse emissions.* The lands in question are less than two (2) kilometers from the Regional Centre. This is considerably less distance than most other lands currently designated Urban Settlement. So-called "suburban" development will impact existing choke-points entering peninsula Halifax regardless of location. However, proximity of our lands to the Regional Centre will allow greater opportunities for alternative transportation including, enhanced transit, cycling and water taxis.

Based on these observations, we believe that:

- The Regional Plan should be amended to re-designate lands currently designated Urban Reserve and being located between Williams Lake and Oceanview Drive, "Urban Settlement" designation.


- Said lands should be rezoned “RDD” to provide for future serviced development consistent with all relevant policies of the Plan.

Conclusion

We would be remiss if we did not take the time to acknowledge the significant contribution that CDAC members have made to the RP+5 review. At times, it must appear overwhelming to deal with the large numbers of requests for amendments to the existing Plan. Your contribution to the process is greatly appreciated.

It is neither our desire or intention to upset the general intent of the Regional Plan, including RP+5. However, as a significant investor in this municipality for over 50 years, we believe that our requested changes are reasonable and in the best interests of the broader community. As such, we look forward to your favourable consideration of our submission.

Yours truly,



Original Signed

J. Michael Hanusiak
Sr. Vice President & General Manager.

cc. Austin French



Reference # 3.14

From: Miranda Cobb

Sent: July 17, 2013 4:44:26 PM (UTC-04:00) Atlantic Time (Canada)

To: Regional Planning Office, HRM

Cc: Watts, Jennifer

Subject: I want to see food security mentioned in the Regional Plan

I care about food issues both as an individual and as a staff of the Ecology Action Centre.

As an individual I am concerned about the lack of food policy supporting vibrant cities and rural areas in NS. We have incredible resources both natural and human, and we need support to use these resources wisely for the future prosperity of Nova Scotia.

As part of an organization, I work on the Our Food project which is focused on creating Positive Food Environments: physical and social spaces that normalize healthy eating by making it easier to grow, sell and eat good food. Through this work we are fostering healthy people, communities and environment. HRM has taken steps to build local, sustainable food systems by supporting community gardens on municipal land and encouraging the procurement of local food in the catering policy. I encourage you to continue your work in this area.

The Regional Plan is an opportunity for HRM to build on existing work and support a regional food system that supports our local economy and ensures more communities have access to fresh nutritious food. It is an opportunity to increase food security of vulnerable groups in NS. I would like to see HRM use the Regional Plan to commit to strengthening community-based initiatives for food security.

Thanks kindly,

Miranda Cobb

Community Food Researcher

Food Action Committee

Ecology Action Centre

Reference # 3.15

To whom it may concern:

Re: Draft Regional Plan

As I see it, there are some problems with the draft plan, outlined below.

1. Clause G-16 on page 99 introduces a loophole that favours developers. In particular it removes protection offered by the Urban Reserve designation of the Purcell's Cove - Williams Lake Backlands, by permitting rezoning where land abuts serviced land off Herring Cove Road and Harbour designation off Purcell's Cove Road. Clause G-16 should be deleted.
2. Like the majority of homeowners in this area, I strongly favour designating the Purcell's Cove - Williams Lake Backlands as a Greenbelt Area that would allow no development. The Draft Plan includes but does not define the concept of greenbelt. We want a definition that establishes firm growth boundaries and protects these lands for the future.
3. I fully support the abandonment of current growth targets for HRM and adoption of those recommended in the Stantec Consulting report, i.e. 50% urban, 50% suburban and 25% rural, a change which it is estimated would result in very large savings for HRM.
4. There is no shortage of things that might be done with the funds saved. One is to have a public transit system that encourages use by providing service that is frequent enough to make it a practical way to travel in the city.
5. The Draft Plan introduces few changes from the existing Plan. It seems to have very little to do with the citizens of HRM and their preferences and well-being. One of the few changes the Draft Plan includes is the insertion of Clause G-16 (see item 1 above), which opens the way to more development. It appears that developers are scheduled to reap the benefits of change; citizens can continue to foot the bill.

Wendy Cornwall
Halifax

Reference # 3.16



July 15, 2013

Mr. Austin French
Manager, Planning Services
Halifax Regional Municipality
PO Box 1749
Halifax, NS
B3J 3A5

Dear Mr. French:

Re: Draft Regional Plan 2.0

Following a review of the Draft Regional Plan 2.0, I wanted to identify two matters for your consideration.

The first is with respect to the proposed Historic Properties Heritage Conservation District, as illustrated on Map 14. As you may be aware, Crombie owns the property on the west side of Granville Mall, which contains a portion of Historic Properties, as well as the Delta Barrington, and Barrington Place. Although the Historic Properties portion of the property would be an integral component of the conservation district, the Delta Barrington and Barrington Place facades do not provide any degree of heritage value. These are newer facades developed in approximately 1980. I would expect that the goal is to protect the historic character of the Historic Properties, as opposed to the newer Delta Barrington and Barrington Place facades. While these complexes are all situated on the same parcel I am hopeful that only those portions of building façades with heritage value are included for heritage protection within the future conservation district.

The second matter that I wanted to bring to your attention relates to the proposed Rural District Growth Centre that includes our Tantallon Shopping Centre. While the planning policies which will implement the growth centre designations will be created in the future, I wanted to identify at an early stage our view that flexibility for redevelopment and intensification should be an important factor to be considered when the policies are created. Given that this is a large, existing suburban shopping centre located on a highway interchange, new regulations that require a "Town Scale" and "redevelopment of retail plazas in traditional blocks with street-walls encouraged" may render redevelopment or intensification unfeasible at a location where it is intended to be encouraged. Crombie has been investing in many of our existing centres through redevelopment and land use intensification (LUI) initiatives, including an ongoing façade redevelopment at Tantallon. My concern is that new regulations may actually prevent future LUI and redevelopment activity if consideration is not given to the realities of the existing shopping centre.

Thank you for your time and consideration of the points raised above. Please do not hesitate to contact me should you have any questions or wish to discuss these matters further.

Sincerely,
Crombie REIT

Original Signed

Joseph Driscoll,
Manager of Real Estate and Planning, Atlantic Canada

Reference # 3.17

From: Mark Currie
Sent: July 19, 2013 12:32:50 AM (UTC-04:00) Atlantic Time (Canada)
To: Corser, Susan; Tota, Kasia; Regional Planning Office, HRM; Mayor
Cc: Outhit, Tim; kelly@kellyregan.ca
Subject: Regional Plan

Dear Mayor & Community Development advisory Council,

I am writing to provide input for the proposed Regional Plan (RP+5) document and in particular to let you know that Save Bedford's Waterfront society is very concerned that RP+5 heavily favors the interests of the developers, rather than protecting the best interests of HRM taxpayers & preservation of our urban wilderness areas, coastal waterways and harbour areas. As a member of the larger "Our HRM Alliance" group, the "Save Bedford's Waterfront Society" shares concerns expressed by our allies that the revised HRM Regional Plan does not adequately tackle crucial issues such as sprawl, affordable housing, transportation & green-belting, preservation of the environment & proper water buffer zones. The MP-5 offers a few encouraging commitments towards keep Nova Scotia's coastal areas & freshwater ecosystems healthy and productive. These include the proposed water supply protection zone, and stricter restrictions around clearing vegetation around watercourses in riparian buffer zones. However, despite this, RP+5 proposes changes that will further weaken existing water and coastal policies and by-laws and have grave consequences on water quality.

While we support a renewed commitment to riparian buffer zones around all water bodies (Section 2.3.3, Policy E-16) – we still feel strongly that a 30 metre buffer zone should be considered around all fresh water bodies, and wider setbacks of 60 – 100 metres for exposed or eroding coastal areas. We also support restrictions on vegetation removal from riparian buffer zones (Section 2.3.3 Policy E-16).

Save Bedford's waterfront is very concerned with the following as it directly affects our community, environment and our waterfront:

Halifax Harbour (Section 2.3.3, Policy E-17). Within the current plan, Halifax Harbour is exempt from watercourse buffer requirements/ Halifax Harbour is a large, complex, and diverse part of HRM. How can this be?

Within the current Harbour Zone are residential, commercial or natural areas that non-industrial and do not host marine dependent activities.

This includes, but is not limited to, areas such as Bedford Waterfront, North West Arm, Mill Cove, Cow Bay and Eastern Passage, the former DND lands. Watercourse buffers and setbacks should be required in these areas just as they are around other HRM watercourses!

For those of you that may still be under the assumption that there is no natural pre-existing shoreline left on the Western Shore of Bedford basin, that assumption is wrong. There is and it needs protection.

Development Agreements and as-of-right development (Section 2.3.3 E-18).

Under RP5, Riparian agreements. buffers are not required for as-of-right development, and need only be "considered" for development We believe riparian buffers should be required for all developments adjacent to a watercourse.

"Grandfathering" riparian buffer requirements (Section 2.3.3, Policy E-19). The proposed changes to RP-5 calls for relaxing riparian by-law requirements on lots in existence before this plan came into effect in 2006. Save Bedford Waterfront Society thinks there should be absolutely no relaxation of buffer requirements, particularly on lots that are not suitable for development such on floodplains, or low lying coastal areas!

Many aspects of the plan need more consideration and certainly more community input:

- a) Growth strategy
- b) Greenbelting
- c) Transportation
- d) Community engagement
- e) Water buffer zones

We believe that these sections of the Plan cannot be dealt with internally by the Halifax Regional

Municipality (HRM) administration.

They are to do with the very nature of HRM and how it reflects community values, not technical issues. It is not reasonable to wait for the public hearing, and expect informed community discussion and creative debate to inform council's decision in the fall.

Clause G-16 is an overt loophole designed to be exploited by developers and removes protection for our Urban Reserve lands. Clause G16 must be deleted.

The Stantec Consulting report, provided to HRM Council, recommended a growth target of 50% urban, 25% suburban and 25% rural, in order to save the city \$3 billion over 18 years. Council should act in the best interests HRM taxpayers, heed this advice, and incorporate this as an accountable target in the RP+5. The 25% urban, 50% suburban and 25% rural development target must be deleted.

The concept of "greenbelting" should be clearly defined in RP+5 and specific areas of HRM should be protected from development under this designation.

Please let it be documented that we are very dissatisfied with the proposed Regional plan as it stands now, and are opposed to it. Please listen to the people and community groups in your city and make the positive changes. We have copied our councilor & our MLA on this as well.

Regards,
Mark Currie
President -Save Bedford's Waterfront Society Bedford, NS

Reference # 3.17

From: Joyce Currul (Darrel Beaver)

Sent: July 16, 2013 2:42:25 PM (UTC-04:00) Atlantic Time (Canada)

To: Regional Planning Office, HRM

Dear Sir/Madam,

I am writing to provide input for the proposed Regional Plan (RP+5) document and, in particular, to raise my concerns that RP+5 heavily favors the interests of developers, rather than protecting the best interests of HRM taxpayers and preserving our urban wilderness areas (such as the Purcell's Cove/Williams Lake Backlands).

Specifically:

1) Clause G-16 is an overt loophole designed to be exploited by developers and removes protection for our Urban Reserve lands. **Clause G16 must be deleted.**

2) The Stantec Consulting report, provided to HRM Council, recommended **a growth target of 50% urban, 25% suburban and 25% rural**, in order to save the city \$3 billion over 18 years. Council should act in the best interests HRM taxpayers, heed this advice, and incorporate this as an **accountable** target in the RP+5. **The 25% urban, 50% suburban and 25% rural development target must be deleted.**

3) **The concept of "greenbelting" should be clearly defined in RP+5 and specific areas of HRM should be protected from development under this designation.** In particular, the Purcell's Cove/Williams Lake Backlands should be a protected corridor, designated as a greenbelt area, that should be completely off-limits to development.

Sincerely,

Joyce Currul

Reference # 3.19



July 5th, 2013

Dear Mayor and Community Development advisory Council,

As a member of the Our HRM Alliance, the Ecology Action Centre shares concerns expressed by our allies that the revised HRM Regional Plan does not adequately tackle crucial issues such as sprawl, affordable housing, transportation, and green-belting.

In addition, the Ecology Action Centre's Coastal and Water committee has the following comments about the proposed changes to HRM Regional Plan (RP Plus 5). These comments and concerns stem from Chapter 2 - Environment, Energy and Climate Change and Chapter 8 - Wastewater Infrastructure.

The MP-5 offers a few encouraging commitments towards keep Nova Scotia's coastal areas and freshwater ecosystems healthy and productive. These include the proposed water supply protection zone, and stricter restrictions around clearing vegetation around watercourses in riparian buffer zones. However, despite these welcome intentions, RP+5 proposes changes that will weaken existing water and coastal policies and by-laws and have grave consequences on water quality.

EAC supports

- Watershed Management planning (Section 2.3.1, Policy E-24) – although the EAC would like to see clear targets and deadlines for the completion of watershed studies and plans.
- The creation of a Potable Water Supply Zone (Section 2.3.1, Policy E-14)
- A renewed commitment to riparian buffer zones around all water bodies (Section 2.3.3, Policy E-16) – although we think that a 30 metre buffer zone should be considered around all fresh water bodies, and wider setbacks of 60 – 100 metres for exposed or eroding coastal areas.
- Restrictions on vegetation removal from riparian buffer zones (Section 2.3.3 Policy E-16).
- Adapting HRM's stormwater management guidelines (E-24). Innovative stormwater management such as Low Impact Development (LID) has been shown to reduce pressure on stormwater infrastructure and improve groundwater recharge. Several demonstration sites in the city exist to display beautiful and functional LID

features. Although HRM's stormwater management guidelines describe a number of "alternative best management practices", stronger regulations are required to enforce the adoption of these practices.

EAC is concerned with the following:

- Halifax Harbour (Section 2.3.3, Policy E-17). Within the current plan, Halifax Harbour is exempt from watercourse buffer requirements/ Halifax Harbour is a large, complex, and diverse part of HRM. Within the current Harbour Zone are residential, commercial or natural areas that non-industrial and do not host marine dependent activities. This includes, but is not limited to, areas such as Bedford Waterfront, North West Arm, Mill Cove, Cow Bay and Eastern Passage, the former DND lands. Watercourse buffers and setbacks should be required in these areas just as they are around other HRM watercourses.
- Development Agreements and as-of-right development (Section 2.3.3 E-18). Under RP5, Riparian buffers are not required for as-of-right development, and need only be “considered” for development agreements.
The EAC believes riparian buffers should be required for all developments adjacent to a watercourse.
- “Grandfathering” riparian buffer requirements (Section 2.3.3, Policy E-19). The proposed changes to RP-5 calls for relaxing riparian by-law requirements on lots in existence before this plan came into effect in 2006. The EAC thinks there should be no relaxation of buffer requirements, particularly on lots that are not suitable for development such on floodplains, or low lying coastal areas prone to inundation and storm damage.

Other considerations

- HRM RP+5's wetland policy (Section 2.3.2 Policy E-15) only applies to wetlands over 2000 square metres. The EAC is pleased that HRM recognizes the value of wetlands and their unsuitability for residential and commercial development. We are concerned that only wetlands above 2000 metres will be recognized in Wetlands Schedule A. Smaller wetlands will require identification and alteration permits only under provincial regulations. Under the provincial wetland policy, wetlands less than 100 square metres can be altered without approval from the province. HRM's landscape is dotted with many small wetlands that are infiltration areas and important local habitat. These wetlands are threatened by sprawl development. The EAC thinks there should be space in the Wetland Policy to restrict development on smaller wetland of high local social or ecological significations. HRM should apply its policy to all wetlands, not just larger ones.
- Sea level rise and Coastal Inundation (Section 2.3.5, Policy E-25) HRM's own flood risk and inundation studies show our waterfront and coastal areas are at risk from sea level rise, flooding, and storm surges. The requirement that all new developments should be

above 2.5 metres vertical elevation from Ordinary High Water Mark is outdated, and should be increased to 4 metres.

- North West Arm (Section 2.3.3 last paragraph). The EAC s pleased that RP+5 recognizes the special form and character of the North West Arm, and the potential negative impacts of infilling and unsuitable coastal development. The EAC would like to see a timeline for completing a NWA plan, with specific area-appropriate bylaws. We would like to see similar recognition that other non-industrial area of the Halifax Harbour like the Bedford Waterfront and Cow Bay/Eastern Passage require similar area specific plans.
- Stormwater Rates (Chapter 8) : the EAC would like to see HRM continue to work with Halifax Water pm stormwater management. Halifax Water has introduced a stormwater rate, yet there is no financial incentive at this time for homeowners to reduce the stormwater volume coming off their property. EAC would like to see a regulation stating that a homeowner can have an environmental professional assess the stormwater management features on their property to determine whether they are capturing and infiltrating all stormwater from their property. If they are they should have the ability to waive the stormwater fee. This would provide a real financial incentive for the homeowner, who would be able to save money on their water bill every month.
- Both HRM and Halifax Water should consider stormwater quality regulations, including controlling discharge of nutrients such as nitrogen and phosphorous that cause eutrophication in receiving water bodies.

In conclusion, Lakes, rivers, wetlands, and coasts are Halifax Regional Municipalities' greatest assets. The EAC would like to see you address our concerns in order to preserve and protect these resources for all citizens.

Sincerely,

Jennifer Graham, Coastal Coordinator
Jocelyne Rankin, Water Coordinator
Jennifer West, Geoscience Coordinator

Ecology Action Centre Coastal and Water Team

Reference # 3.20

From: Dal U

Sent: July 17, 2013 4:21:33 PM (UTC-04:00) Atlantic Time (Canada)

To: Regional Planning Office, HRM

Cc: Mason, Wayne

Subject: Comments to the Regional Plan +5, draft 2

To whom it may concern,

We, Ariel Weiner and Samantha Luc, are writing on behalf of the Campus Food Strategy Group at Dalhousie University, to urge the Community Advisory Design Committee to include a section on food values within the Regional Plan +5. We believe that these values should reflect an emphasis on food security and sustainability within the Halifax Regional Municipality.

The *Campus Food Strategy Group at Dalhousie* is a part of the Campus Food Systems Project, a national non-profit organization working with students, community members, faculty, administrators, food service providers to maximize local and sustainable food available on university campuses across Canada. Dalhousie University is one of the largest institutional purchasers of food in Nova Scotia, and is strongly committed to supporting a sustainable food system and local economy. As such, we want to ensure that Dalhousie's food values are aligned with those of the HRM.

The Regional Plan presents an excellent opportunity for HRM to embed food security and sustainability within its long-term mandate. We would like to see the next draft of the RP+5 include language that supports a strong and resilient food system in HRM. Local food production and consumption, accessibility to nutritious food, and food literacy are paramount to the success of a sustainable food system, and the RP+5 should state the HRM's commitment to those initiatives which improve upon these values.

Sincerely,

Ariel Weiner and Samantha Luc

Dal@Studentfood.ca

Campus Food Strategy Group
Dalhousie University

Reference # 3.21

From: dobson
Sent: July 18, 2013 7:06:56 PM (UTC-04:00) Atlantic Time (Canada)
To: Regional Planning Office, HRM
Cc: purcellscovearea1@gmail.com; Mosher, Linda; Adams, Stephen
Subject: Revised Regional Plan Input

To: Members of the Community Design Advisory Committee

Re: Regional Plan +5 Review

Dear Committee,

Thank you for the time and effort you have spent in revising the Regional Plan for HRM. I was heartened to see the concept of greenbelting being included along with recognition of the importance of protecting environmentally-sensitive areas and green spaces. Based on material available online and presented at the public meeting held on June 17th in Dartmouth, however, I have significant concerns that the Revised Plan will fail in these key objectives. From the response to a question from the public at the June meeting it seemed that no green belt would be identified in the plan, rather, this would occur at some later unspecified date.

Unfortunately, if the plan does not identify specific areas for protection, they may well not exist at a later date. This is particularly true if clause G-16 is left as it currently stands.

A second point that came up at the public meeting was the issue of view planes. Retaining the view of the harbor from various vantage points in HRM has been a key feature of past HRM plans. I am therefore surprised that no attention has been paid to the views seen looking a little further, to the other side of the harbor. We are fortunate that Sir Sanford Fleming had the foresight to protect his estate as parkland in perpetuity before deeding it to the city so that an inland portion of the Northwest Arm shoreline has been kept green. At the moment, visitors and residents looking outward from Point Pleasant Park looking to the south see York Redoubt and to the west, Purcell's Cove and the Urban Reserve land that rises above it inland to the west. Does the proposed Plan provide any vision of what the view of that land to the southwest should look like in years to come? It should.

I recently served as a member of the Community Steering Committee looking at the feasibility of extending sewer and water services to Purcell's Cove. Our committee surveyed the residents of the two areas being considered for central services. It was clear from responses to our mail-out survey and from a public meeting held by the engineering firm contracted to do the costing that the majority of residents did not want the services. What also came out from the survey, from emails, from public participation at our meetings and from the meeting held by the engineering firm was that the larger community as well as the residents of Purcell's Cove want to see the backlands protected, retaining the undeveloped land as wilderness and natural parkland. This area is a logical part of any greenbelt and as such a visible part of HRM, worthy of special consideration.

In closing, I ask the committee to:

- 1) Retain the Urban Reserve designation for areas such as the Purcell¹s Cove backlands until such time as the areas of HRM to be protected as greenbelt or that are to be left as green spaces for future generations have been identified, preferably in the near future.
- 2) Remove clause G-16 so that the Urban Reserve land cannot be developed based on being rezoned to that of a neighboring area.
- 3) Consider the views of the Halifax shoreline in your plans

Thank your for your consideration of these points.

Yours sincerely
Melanie Dobson

Reference # 3.22

From: rdouglas

Sent: July 16, 2013 11:00:07 PM (UTC-04:00) Atlantic Time (Canada)

To: Regional Planning Office, HRM

Subject: re: Developement of lands surrounding William's Lake

Dear City Planners,

My wife and I have lived on Williams Lake for the past three years.

We chose to live here because of the beautiful natural surroundings and the fact that the City of Halifax has preserved this ecological habitat gem for hundreds, yes, hundreds of years. This area has been used by Haligonians and their families and progeny for 250 years. Citizens continue to enjoy the trails, the views around the lake, the quietude, the birds and animals such as loons and deer, eagles and beaver. Citizens bring family from all over North America and Europe and Asia to walk the trails year round and swim in the pollution free water in the summer,

Visitors are amazed that the city has reserved this habitat for nature lovers and outdoor enthusiasts who can bus here on a city bus!

The William's Lake Area deserves to be preserved. Your plan should enshrine our Nova Scotian value that includes weaving a wonderful balance between urban expansion with watershed and sensitive forest conservation. This area is too sensitive to disturb. It is too close to the Northwest Arm.

Urban expansion along the Herring Cove Road from Spryfield to Herring Cove Village, a major transportation corridor, makes much more sense.

We believe a Beltway of land adjacent to Purcell's Cove Road from Hall's Road to Purcell's Cove itself and beyond should be preserved. The area includes lakes and forests and hills and dales within the City of Halifax. The Green Belt through Halifax Commons to Point Pleasant Park serves citizen's urban recreational and ocean needs in excellent fashion. We trust that City planners will make sure that the William's Lake corridor will continue to serve our conservation and lake needs in a similar fashion.

The City should consider buying out developers to the extent that the William's Lake surrounds are protected for future generations of Haligonians and Nova Scotians. We are opposed to any form of urban development in this precious Green Belt.

Respectfully,

Robin and Lynn Douglas

Reference # 3.23

Downtown Halifax. Where the Maritimes Meets the World



Dale Godsoe,
Chair of the Community Design Advisory Committee

July 16, 2013

Dear Dale,

I would like to take this opportunity to, on behalf of the Downtown Halifax Business Commission and its 1,500 members, to provide feedback on the current draft of the Regional Plan. Overall, let me say that while I appreciate the effort put into this plan, and the fact that CDAC and Municipal staff have been very open to meeting with me, the draft of this plan is extremely disappointing. Not only is it not representative of the aspirations that I had for the revisions, but I do not believe it reflects the aspirations of HRM's citizens, nor many of its elected officials.

Before getting into specific concerns and suggested changes, I would acknowledge that my interest is predominantly in the viability of the downtown core. While lack of investment and focus on the downtown has been damaging, far more damage has occurred because of the pattern of growth which HRM has experienced over the past several decades. It is best described as "sprawl", a word that seems to offend some in HRM, though its use is prevalent everywhere else. But whatever term is used, HRM has grown in an unsustainable pattern. Residential sprawl begat retail sprawl, which begat commercial office sprawl. This type of growth is only affordable if a strong central core exists. Virtually all of our efforts to revitalize the Regional Centre will be for naught if we don't fundamentally change the pattern of residential and commercial growth. The 2006 plan did recognize this and set a modest, but realistic target of 25% of residential growth in the Regional Centre. In the seven years since then, the actual Regional Centre growth has only been 17%. This means that just to get back on track, we would need to overachieve on that target and see 33% of the growth in the Regional Centre. Little in the revised plan suggests this will happen. This lack of bold changes comes in the wake of two HRM-commissioned reports, which stress the importance of urban core population: the Altus and Stantec reports.

I would like to take this opportunity to identify specific changes I would like to see to the plan (note: my comments, page numbers and policy numbers refer to the May 17 draft of the plan):

Chapter 1: Introduction

Section 1.1. refers to the Stantec report and the fact that meeting the 2006 targets of 25/50/25 will save \$670 million. However, it then suggests that the plan will adhere to those targets. I would suggest that a midterm strategy be set of getting back on track by year 10 of the plan, and then consider strengthening the urban core targets. This seems to be the practice in many other cities. Given the large area bounded by our Regional Centre, a 25% target seems very modest for a plan that has 18 years left to it.



The Centreplan is central to much of what the Regional Plan wishes to achieve. Having been on the Urban Design Task Force for some of its early deliberations, I feel comfortable in the form it was taking. This draft however does not even lay out the groundwork of the Centreplan, nor does it affix a timetable to it. It is very difficult to accept this draft of the Regional Plan without a lot more information about what the Centreplan is likely to say. I am not even certain we should proceed with adopting this plan, without a completed Centreplan.

On page 15, the HRM population growth map lists an age group of 25-64. This seems like a pretty wide margin. Given how much demographics will drive planning in this city, more attention to these trends would probably be useful.

Chapter 2: Environment, Energy and Climate Change

The term “Greenbelting” as used throughout this plan is not what was proposed by Our HRM Alliance. Nor is it a greenbelt as is understood by the planning community and what we see in other cities. The “Greenbelting Open Space Network” is a laudable addition to the plan. But it should be re-designated, to avoid confusion. Greenbelting as envisioned as a key part of the plan at stakeholder sessions, during the municipal election campaign, and our discussions, has not been incorporated. The arguments for a greenbelting system won’t be re-hashed here, but I believe that it could provide the bold move that this plan lacks. A greenbelting system is something tangible the public can understand. It would help to direct growth in a clear, understandable and popular way (in a CRA poll, 86% of residents supported the idea of a greenbelt). It is hard to understand HRM’s resistance to a greenbelt when it has been used successfully in many other cities. In speaking with colleagues in Toronto and Victoria they seem to feel their greenbelting systems have produced favourable results. Even in Ottawa, where it is broadly understood that development merely “jumped” the greenbelt, they are still very proud of the public greenspace they created. We have learned a lot since the Ottawa model and are confident the greenbelting plan provided by OurHRMAlliance is workable. It makes the directing of growth much more transparent to the public, developers and political leaders. It would be a bold move.

It is not clear what the timetable for implementing the “Greenbelting and Public Spaces Priority Plan” is and what happens in the meantime (E-10, pg.26 and E-13, pg.28)

The HRM’s Economic Strategy calls for the creation of district energy. This could be linked to Policy E-28 (pg.34), to strengthen both documents.

Chapter 3: Settlement and Housing

The entire Urban Settlement and Urban Reserve Designations sections are problematic (3.2.1 and 3.2.2 on pgs.38-39). We saw through the 2006 plan that by recommending that an area not be developed, but leaving enough room for a developer to make proposals, that proposals did come in for Sandy Lake, Port Wallace, and Highway 102 West Corridor. While Council has not fully approved these areas, they certainly seem to be heading in that direction, and this plan encourages that. If we are to achieve our growth targets, why would we not adjust the areas where development is allowed? A clear direction would be to designate urban reserves, but specify that no development shall take place at all for the life of the plan. The fact that Council still needs to approve the development of urban settlements and reserves, demonstrates that development rights are not inherent in these areas. These areas should

become part of the greenbelt, with appropriate development controls.

Greenbelts are not meant to restrict every type of development or use. In fact preserving agricultural resources is one of the features of greenbelting. Section 3.2.3.3 on the Musquodoboit Valley is a perfect example of what could be included in a greenbelt.

There are too many growth centres.

Dartmouth Crossing, because of its close proximity to an industrial park is not an appropriate area for a population growth centre and should be removed from the list of Suburban District Growth Centres (Table 3.1, pg.42).

Port Wallace should be removed from the list of Suburban Local Growth Centres (pg.42)

Section S-33 (g) is a good goal but very vague, re: allowing infill development.

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.

Chapter 4: Transportation

This chapter should be renamed “Mobility”

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.

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.

Third Harbour Crossing should be removed from the plan. (pg.61)

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.

Chapter 5: Economy and Finance

5.3.1 States that HRM should adhere to the Business Parks Functional Plan, which states that “HRM should focus its future business park development on industrial uses and leave office and commercial development to the private sector.” HRM has not adhered to these policies, selling and developing land in its business parks for office and commercial use. As a result the downtown now has only 43% of the city’s office space. This was identified in the “Value of Downtown Research” conducted by the Canadian Urban Institute (2011, 2013) as well as the Altus report on business location decisions. In 2011/12, HRM sold an additional 354 acres of business park space, not for industrial use (source: The Halifax Index). This section does seem to be good, but does not address reversing how HRM has actually not adhered to its own Business Parks Functional Plan.

5.3.2, EC-6 (pg.65) allows for the development of more private business parks. This makes no sense given a desire to cluster population around growth centres. At this point, between the downtown, main streets, strip mall developments, neighbourhood malls, regional malls, small big box parks and the two major big box parks (which are still expanding) the municipality is well-served by retail, restaurant and commercial options. Given the amount of migration between some of these commercial sectors, as well as vacancy rates, it can easily be surmised that there has been too much commercial development. While HRM does not want to stymie commercial development, significant attention is not being paid to existing areas that are struggling because of the ever-increasing expansion of commercial development that seems to be outpacing population growth. HRM should take a stand and seek to reinforce the character and strength of its existing commercial centres, be they business parks, malls or main streets. This policy should actually not allow the creation of any more business parks for a specified time – either until the next review or the entire life of the plan.

EC-9 (pg.66) is a laudable policy, but does not seem to be able to be achieved at the current time. HRM has no “workforce housing” policy, which would see residential development designated for people who live within walking distance of a commercial hub. This policy leaves far too much leeway for developers to simply claim that the people who live in a new development within a business park would walk to work. Until such a policy is created, no residential development should be allowed within a business park.

EC-14 (a) (pg.68) speaks to revenue streams, but does not mention the reality that if servicing costs exceed tax revenue streams from the majority of new development, it is not fiscally responsible. This reinforces the need to meet the population growth targets, which will see more homes that have a net positive impact on the city’s budget.

EC-15 (pg.68) should more specifically say in what manner Council should work with these groups to accomplish this goal. Perhaps this needs to also be a priority plan.

Chapter 6: The Regional Centre

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.

RC-3 Needs a timetable to ensure the Centreplan follows immediately on the heels of the Regional Plan’s adoption.

RC-4 This should be more specific in terms of how Council considers the recommendations of the Strategic Urban Partnership (ie, an annual report to Council).

Chapter 8: Municipal Water Services, Utilities and Solid Waste.

SU-1 (pg.83) is a good provision, but it is unclear whether this happens with the adoption of the plan, or sometime in the future

SU-2 (pg.83) is not nearly strong enough. Removing the word “consider” makes it much stronger. If this is meant to be the adoption of the Slack/Kitchen recommendations, it should state this.

8.3(a) makes the statement that operation/administration of water from HRM to Halifax Water was made to “better serve the public interest”, but with no further clarification as to what that means.

Appendix A: Performance Measures

For #2 it is not clear whether it is square footage, units, or number of people being measured for commercial growth. All would be useful measures, as square footage alone does not tell the full story.

Map 8: The Hierarchy Road Map

Identifies the re-designation of many minor collectors to major collectors. This has the result in traffic priority over any other uses. While this may be necessary in some cases, it defeats the purpose of the upcoming Centreplan, which is about creating density and neighbourhood conditions. While higher density will be allowed on some of these collectors, the change in designation makes them much less desirable for residential development – particularly for family living. As the map has already caused great consternation, it makes sense to not list these re-designations in the Regional Plan, but rather wait for the completion of the Centreplan.

Other comments:

The Regional Plan should set some commercial targets as well as residential ones. Retail growth has mostly taken the form of expansion, although now it seems as if there is more juggling of existing retail than actual growth. 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. The “Value of Downtown” research conducted by the Canadian Urban Institute, shows that the percentage of office space in the “Downtown” area now sits at 43%. This is the lowest of the 17 Canadian cities studied, and one of only two cities under 50%. The Altus report attempted to study the impact that HRM’s tax system had on this situation. The study did identify some of the reasons commercial tenants were leaving the downtown, but did not identify why this was so much more pronounced in Halifax, as the identified factors (ease/cost of parking, commute times) would be similar in most cities. It is clear that this situation should be reversed, in order to fulfil the objectives of the Regional Centre chapter, and clear goals are one way to bring more attention to this issue, which has major repercussions on the viability of Transit.

Finally, it seemed initially that RP+5 was launched with an eye to being bold, refining what had not been successful from the 2006 plan, and responding to how much more we now know about demographic trends, sustainability, and cost of servicing. A plan must respond to the community it seeks to serve, and what is most remarkable to me is not how much community groups seem to differ, but rather how much they seem to agree on the key principles. A plan must also aspire, inspire, and educate. It is disappointing to see how little has changed in RP+5 and how many times a bold approach is not taken. I encourage you to look again at the plan and reach more and respond more in a positive way to what the community is saying.

Thank you again for taking, and considering, this feedback.

Sincerely,

Original Signed

Paul MacKinnon
Executive Director
Downtown Halifax Business Commission

cc Mayor Mike Savage
Fred Morley, Vice Chair, CDAC
Austin French, Manager of Planning
Jane Fraser, Director of Planning
Community Design Advisory Committee

Reference # 3.24

From: Michael Drinkwater

Sent: July 18, 2013 8:11:54 AM (UTC-04:00) Atlantic Time (Canada)

To: Regional Planning Office, HRM

Cc: purcellscovearea1@gmail.com

Subject: Proposed regional plan

Dear Sir/Madam,

I am writing to provide input for the proposed Regional Plan (RP+5) document and, in particular, to raise my concerns that RP+5 heavily favors the interests of developers, rather than protecting the best interests of HRM taxpayers and preserving our urban wilderness areas (such as the Purcell's Cove/Williams Lake Backlands).

Specifically:

1) Clause G-16 is an overt loophole designed to be exploited by developers and removes protection for our Urban Reserve lands. **Clause G16 must be deleted.**

2) The Stantec Consulting report, provided to HRM Council, recommended a **growth target of 50% urban, 25% suburban and 25% rural**, in order to save the city \$3 billion over 18 years. Council should act in the best interests HRM taxpayers, heed this advice, and incorporate this as an **accountable** target in the RP+5. **The 25% urban, 50% suburban and 25% rural development target must be deleted.**

3) **The concept of "greenbelting" should be clearly defined in RP+5 and specific areas of HRM should be protected from development under this designation.** In particular, the Purcell's Cove/Williams Lake Backlands should be a protected corridor, designated as a greenbelt area, that should be completely off-limits to development.

Sincerely,

Michael Drinkwater, CGA

Reference # 3.25

July 18, 2013

Dear Mayor and Councillors of HRM,

As the Regional Plan is being reviewed and updated, I ask you to consider the following issues:

1. Widening of Bayers Road: The decision to still plan for the widening of this road is of concern. When we want to increase density and decrease traffic, why is this up for consideration? As we move ahead to more self-powered transportation, why is the car given preference over people?
2. The point above fits in with my next topic. Housing Affordability. Why is the money that we save from widening roads, not used for building housing for a variety of individuals and families? Housing is a social determinant of health, roads are not.
3. Green Belting. As much as I support green belts, I also support green spaces. HRM is becoming a built area with a dearth of green spaces. ALL development need to have the cost of pocket parks built into the regulations. We need to connect with nature for clean air and livable cities.
4. Transit. Transit is a necessity and for all reasons, not only for work. Why is it that we live in an "Ocean Playground" but I cannot take a bus to the beach? Why have we not used our amazing harbour for water ferries from Bedford? Why are we even thinking of a third bridge?
5. Active Transportation. We need to have more people only spaces, which is why Switch is so popular. Have the vision to create public spaces that do not allow cars, and make people a priority. Treat the bicycle as an important part of transportation and not a secondary thought. Can you imagine if the money for the Washmill had been used for active transportation? Now, that would have taken political will and vision...

The city appears to be 'stuck' in a mindset that went out of date years ago. We have no high speed transportation, we still value the car, single dwelling homes, homogeneous multiple dwellings, separation of people based on income and a transportation system that cannot be tracked in real time. None of these issues need to be invented, as other areas in Canada and around the world already have/are creating cities that honour people and allow lives to be lived on a human scale.

May those who re-invent the Regional Plan be infused with vision and boldness that will define Halifax as a city that cares about the public value of all its decisions.

Sincerely,

Andrea D'Sylva

Reference # 3.26

From: Aaron Eisses

Sent: July 15, 2013 9:03:04 PM (UTC-04:00) Atlantic Time (Canada)

To: Regional Planning Office, HRM

Cc: Matheson, Lynn; Mason, Waye

Subject: In regards to the regional plan review phase 2.

To whom it may concern,

In 2013 many challenges exist in cities today that did not exist in the recent past. Fuel prices and food prices are rising, the gap between the rich and the poor is increasing, the climate is changing, and even the cost of growing grass and maintaining lawns is increasing. HRM is starting to address these issues by adding more gardens and raised beds around the city to grow food. This is not enough. It is very possible for a city the size of Halifax to feed itself, we need to start moving in this direction. It is irresponsible for HRM to not include a food policy in the current revisiting of the regional plan. The security and well being of all the citizens of HRM is enhanced by having a high quality local food source.

Thanks,

Aaron Eisses concerned citizen and Volunteer on the Food Action Committee and the Ecology Action Centre.

Reference # 3.27



July 17, 2013

By Email: PlanHRM@halifax.ca

Halifax Regional Municipality
Regional Planning office, 2nd Floor
40 Alderney Drive
PO Box 1749 Halifax, NS B3J 3A5

Dear Mayor Savage, Councilors and members of the Community Design Advisory Committee,

Re: Comment on Draft #2 of the RP+5 Regional Plan

Please accept this letter as an official submission of comment on Draft #2 of the RP+5 Regional Plan. The Elia Corporation owns 2.1 acres of vacant land in the Downtown Dartmouth plan area bounded by King Street, Edward Street, and the Dartmouth Common. Following much public consultation, our property was designated as an Opportunity Site in the 2000 Downtown Dartmouth Secondary Planning Strategy (DDSPS) and in the 2006 Regional Plan. The Opportunity Site designation in the Regional Plan enables high-density development on vacant sites so that repopulation objectives can be achieved.

Development of our Opportunity Site, like other Opportunity Sites, has been stalled due to the lengthy review of the Dartmouth view planes. Now, with Staff and Community Council recommendations for the removal of the private Brightwood view plane affecting our land, Staff is proposing to remove all traces of Opportunity Sites from the Regional Plan without consultation, without notification and certainly without any clear justification. After years of waiting for clarity on the view plane issue, we find ourselves baffled by Staff's baseless proposal to remove what is arguably the only Regional Plan mechanism that has produced any results in terms of repopulation targets for Regional Centre – targets that HRM missed by a long-shot during the first 5-years of the Plan.

The Elia Corporation held off on submitting a development application on our lands while the view

plane issue was settled and, following advice from Staff, was prepared to submit conceptual plans for consideration during the Centre Plan process. The Centre Plan, however, seems to be delayed indefinitely or is, at best, years away from approval. At no time was it mentioned that, even without the Centre Plan in place, Staff intended to remove Opportunity Sites from the Regional Plan.

In the absence of the Centre Plan, I urge members of the CDAC and Council to maintain support for those Opportunity Sites identified in the Regional Plan and SPSs. The Regional Plan makes a clear distinction between lands identified as Opportunity Sites (as shown on the Regional Plan map and specifically listed with the text) and “others not identified here, but with similar conditions, [that] may also be developed with the same considerations.” If necessary, remove this ambiguity around potential Opportunity Sites, but do not place lands that are clearly identified in the Regional Plan and through consultation with the public in further limbo while the Centre Plan is sorted out.

Why the Regional Plan Needs Opportunity Sites

A recent Stantec report commissioned by HRM demonstrates both the need for and the success of Opportunity Sites within the Regional Plan. The report found that the growth allocation was even less than estimated by HRM Staff, with only 11% - not 16% - of housing added within the Regional Centre – far short of the relatively modest 25% target. In the case of Dartmouth, the findings were particularly bleak, as the area actually lost population between 2006 and 2011. With limited vacant sites available within the Regional Centre, Opportunity Sites are critical to the achievement of core Regional Plan objectives as they do not require removal of existing housing.

Since the adoption of the Regional Plan these sites have accommodated a significant portion – as much as 50% – of residential construction in the Regional Centre. It is not possible to meet Regional Plan objectives without the use of designated Opportunity Sites and it is the only way to reverse the depopulation of Downtown Dartmouth. I hope you can understand our astonishment at this move by Staff given these facts.

Why Opportunity Sites Need the Regional Plan

The Opportunity Sites section in the Regional Plan supports future development as envisioned by the Downtown Dartmouth community. At the time it was approved, the DDSPS clearly stated its optimism for the revitalization of Downtown Dartmouth, acknowledging that there was “renewed private sector interest in residential development downtown, with proposals being considered for several of the

downtown opportunity sites". A cornerstone of the plan was significant community involvement and participation in the visioning and planning process. The outcome showed a clear consensus for the future direction of development: focus on residential development and redevelopment of vacant or underutilized land and/or buildings. Opportunity Sites were identified in consultation with the public as a way to "stimulate further residential growth" and emphasis was placed on diversification of the housing stock to include the "future housing needs of young professionals, families seeking an urban location as well as the burgeoning baby boomers". Specifically referring to our King Street property, the plan states that "Area residents would like development on this site to be geared towards younger people and families to the area to counter an aging population in the area". Community support for the designation of our site as an Opportunity Site is without question.

Residents of Dartmouth continue to show their support for redevelopment of the Downtown area. Residents have endorsed Opportunity Sites during the DDSPS process and have shown subsequent support for Development Agreements for high-density developments on Opportunity Sites like King's wharf and the Irishtown Road/Seagate Residences, as well as for the Dartmouth Cove conceptual plan. Development plans for a WDCL property on Alderney Drive have gone from modest townhouses as specifically mentioned in the DDSPS in 2000 to a 15-storey 165-unit complex today. Certainly, WDCL is proceeding based on the Opportunity Site designation and repopulation objectives of the Regional Plan, as well as the continued show of support for high-density development of Opportunity Sites by the residents of Dartmouth.

Concluding Remarks

Lacking any real public discussion on the issue, I assume that the ambiguity regarding potential Opportunity Sites is the primary reason for the complete removal of the Opportunity Sites section and map in the Draft #2 plan currently under consideration. Unfortunately, the complete removal ignores the fact that that are a number of sites that have been clearly designated as Opportunity Sites in consultation with the community.

Buried in a summary document, Staff suggest that the removal of the Opportunity Sites map and related policy is in anticipation of including them in the proposed Centre Plan. However, nothing is known about the way in which Opportunity Sites will be incorporated into the Centre Plan, when this will occur, and what, if any, guidelines exists for the interim period that could easily last several years. At the same time, HRM Staff have recently discussed their ability to construct 15-storey towers on

HRM-owned property on the Dartmouth waterfront, while private land owners are told to wait for interim height precincts or for Centre Plan approval in 2 to 3 years. If Staff bring forward height precincts, without our Regional Plan Opportunity Site designation, our vacant land will be further downgraded, while HRM-owned lands – which presently serve as valuable public parking areas that support Downtown Dartmouth businesses – are allowed 15-storeys or more!

Why are publicly-owned lands that provide valuable parking to Downtown Dartmouth being presented as prime development sites, while private land owners of identified Opportunity Sites are stuck in limbo, between plans, between processes and without answers? What are the real intentions of HRM Staff in removing Opportunity Sites from the Regional Plan without any plan in place? Without any indication of Staff's objectives, private land owners should be concerned that interim height precincts will favour publicly-owned parking lots while placing additional limits on privately-owned vacant sites.

I cannot understand what Staff is thinking by removing sites that have been clearly identified through public consultation as appropriate for additional density and perhaps the only policy instrument that makes the core Regional Plan re-population objective remotely achievable. I urge members of the CDAC and Council to support the retention of identified Opportunity Sites in the RP+5 amendments to the Regional Plan.

Sincerely,

THE ELIA CORPORATION

Original Signed

Vincent Burns

Chief Operating Officer

Reference # 3.28

From: Chin-Yee, Fionn (CA - Halifax)

Sent: July 12, 2013 10:23:10 AM (UTC-04:00) Atlantic Time (Canada)

To: Regional Planning Office, HRM; McCluskey, Gloria

Subject: HRM Regional Plan changes the designation of Hawthorne Street from a Local Street to a Collector Street

Hi Gloria and HRM planning committee,

I am a resident at Hawthorne Street

The below concerns me. We are a street that is full of young families that have houses right up against the sidewalk. I have concerns about children safety, noise and general congestion. Hawthorne is already over used as a thoroughfare from Portland to Octerloney/Prince Albert and this will only make it worse. There is a bend in the road that makes it difficult for cars to see children, and with the estimated increased speeds/congestion, I am concerns for the safety of my very small children (2 and 4 years old).

Thank you for listening.

Fionn

Reference # 3.29

From: pe.forhan

Sent: July 14, 2013 11:02:40 PM (UTC-04:00) Atlantic Time (Canada)

To: Regional Planning Office, HRM

Subject: RMPS Draft Comments

PlanHRM - RMPS Comments

Urban livestock, I feel, is not meant to be 'in' densely populated urban cores, where rats, mice & racoons are already problematic, as well as allergies, especially in children. Even in suburban core areas, there is a concern with coyotes.

The World Health Organization (WHO) continues to report that the Avian Flu virus remains one of pandemic potential. Because it continues to circulate widely in some poultry populations, most humans likely have no immunity to it, and it can cause severe disease and death in humans. The Centre for Disease Control & Prevention (CDC) in Atlanta reports 2012 had the most outbreaks of human salmonella infections linked to backyard flocks in a single year.

Its source has not yet been identified, but a study published in The Lancet suggested H7N9 was a mix of at least four viruses that originated in ducks and chicken. Many of the cases started around Shanghai, which responded by closing poultry markets. A sharp fall in the number of new infections followed <http://www.independent.co.uk/life-style/health-and-families/health-news/ten-years-after-sars-now-we-have-mers-8640817.html>

*I noticed in the video presented, the PlaceMaking Mural, at Black & Northwood Terrace, Hfx. That clip could have been filmed from 4 different angles, but front and centre, was a **white chicken**. I live 3 blocks from it. I was not overwhelmed by seeing it in the video, as I consider this inclusion **subliminal messaging**. Keeping chickens was not listed as permitted land use on the Peninsula, on June 17.*

Garden plots sound swell, but.....

"Open Space", "Community Form" and "Provisions for urban agriculture", noted in RMPS Draft 2 chapters 2 & 3, seem to be semantic ambiguity. Why do we need a Provision for Urban Agriculture listed? Are garden plots in HRM not 'now' permitted? Unless it is a catch phrase that will lead to the legalization of urban livestock, specifically chickens and other types of poultry/fowl and/or other types of livestock, such as goats. I like the term poultry.....it's all inclusive, as well as, large animals and the young thereof, noted in Edmonton's By Laws. But these concepts would require LUB amendments by HRM Council. Possibly by the inclusion of 'urban agriculture' as a permitted land use. Reference is made in RMPS to land use by-law consideration, requirements, amendments.

Would The RMPS document be presented for approval as an 'omnibus' document?

Obviously, I am vehemently opposed to "**urban livestock / chickens**" in the Regional Core.

I suggest Edmonton's Animal Control By Laws as a good benchmark.

http://www.edmonton.ca/bylaws_licences/C13145.pdf

Plus, it is cost prohibitive for cities to enable backyard chicken operations, **on private residential property**, if proper emphasis to all necessary considerations, is given.

<http://mikethechickenvet.wordpress.com/2012/03/03/why-dont-cities-want-backyard-chickens/>

A recent report out of NBC calls attention to what is happening with backyard chickens when the hipster urban chicken hobbyists lose interest in their backyard ops. As hens, for the most part, only lay eggs for a 2-4 year period and the chickens can live on average 12-14 years, they are ending up in **animal shelters all over the USA** - another cost to cities.

http://grist.org/list/hundreds-of-unwanted-backyard-chickens-are-ending-up-at-animal-shelters/?utm_source=facebook&utm_medium=update&utm_campaign=socialflow

I do not feel privileged to live in close proximity to a **backyard op** where chicken & duck waste is a reality.

As I have not seen the revisions to the draft, **I can only make comments on what was presented**, at this point in time and Richard Harvey's statement.

But I fear that any wording that does not **prohibit** the concept of urban livestock & backyard poultry, will be used to enable legalization.. That's why I like Edmonton's current By Laws so much. And I fear that the public will not be **fully aware** of what's going on..

People who could **afford** to have a backyard chicken op, can afford to acquire farm fresh eggs at the Farmers Market or at the grocery store. further supporting the local economy, which is what we need to support the urban growth target.

Concerning Brendan Elliott's statement on behalf of HRM, in regards to the current Hfx Peninsula LUB of, "**There is nothing to enforce**", I anticipate a newly worded by law in the near future, otherwise anyone would be free to keep 100 chickens, or for that matter pigs on their property without being in breach of HRM Regulations.. I believe that the simple semantics of "permitted uses" are also used in the Halifax Mainland and Bedford LUB's..

Paulette Forhan

Reference # 3.30

From: Brigid Garvey
Sent: July 16, 2013 4:30:26 PM (UTC-04:00) Atlantic Time (Canada)
To: Regional Planning Office, HRM
Cc: purcellscovearea1@gmail.com
Subject: Regional Plan (RP+5) input

Dear Sir/Madam,

I understand that the public has been invited to give their input on the plan for our region. There are some issues with the current draft plan which have been highlighted in my community's ongoing struggle to oppose rampant development, to resist being railroaded into paying for unwanted water & sewer services, and to preserve the character, natural beauty and ecological significance of our area.

The draft Regional Plan falls short on protecting the Urban Reserve lands; Clause G-16 seems to be an overt loophole designed to be exploited by developers and REMOVES protection for our Urban Reserve lands. Others have called for its removal and I too feel strongly that Clause G16 must be deleted.

In planning for the future, specific areas of HRM should be protected from development. The concept of "greenbelting" should be clearly defined in RP+5. Under this designation the Purcell's Cove/Williams Lake Backlands should be made a protected corridor, designated as a greenbelt area, that should be completely off-limits to development.

The Stantec Consulting report provided to HRM Council recommended a growth target of 50% urban, 25% suburban and 25% rural, in order to save the city \$3 billion over 18 years. Council should act in the best interests HRM taxpayers, heed this advice, and incorporate this as an accountable target in the RP+5. In the Plan, however, these targets have been rearranged. The 25% urban, 50% suburban and 25% rural development target must be deleted.

I believe it is important that the Regional Plan protects the Urban Reserve lands. It should set growth targets which are both reasonable and responsible, reflecting sound and sustainable values in all citizens' interests, rather than greasing the way for developers and throwing away the opportunity to preserve, through carefully directed growth, the wonderful natural areas which enrich the lives of HRM citizens.

Sincerely,

Brigid Garvey

Reference # 3.31

From: Michele Grace

Sent: July 18, 2013 8:33:19 PM (UTC-04:00) Atlantic Time (Canada)

To: Corser, Susan; Tota, Kasia; Regional Planning Office, HRM; Mayor

Cc: Outhit, Tim; kelly@kellyregan.ca

Subject: Bedford Waterfront Deserves better planning

Dear Mayor & Community Development advisory Council,

I feel very strongly regarding this issue of urban sprawl blighting the area of the Bedford Basin. Please hear all of our voices and ensure that any development in this area benefits the entire community and not just the developers. The proposed development needs to be halted and reassessed.

The remainder is a reproduction of the Save the Bedford Waterfront Societies message which clearly states all of the issues.

Thank you for your time

Michele Grace

-Begin Attachment –

I am writing to provide input for the proposed Regional Plan (RP+5) document and in particular to let you know that Save Bedford's Waterfront society is very concerned that RP+5 heavily favors the interests of the developers, rather than protecting the best interests of HRM taxpayers & preservation of our urban wilderness areas, coastal waterways and harbour areas. As a member of the larger "Our HRM Alliance" group, the "Save Bedford's Waterfront Society" shares concerns expressed by our allies that the revised HRM Regional Plan does not adequately tackle crucial issues such as sprawl, affordable housing, transportation & green-beltting, preservation of the environment & proper water buffer zones.

The RP+5 offers a few encouraging commitments towards keep Nova Scotia's coastal areas & freshwater ecosystems healthy and productive. These include the proposed water supply protection zone, and stricter restrictions around clearing vegetation around watercourses in riparian buffer zones. However, despite this, RP+5 proposes changes that will further weaken existing water and coastal policies and by-laws and have grave consequences on water quality.

*While we support a renewed commitment to riparian buffer zones around all water bodies (**Section 2.3.3, Policy E-16**) - **we still feel strongly that a 30 metre buffer zone should be considered around all fresh water bodies, and wider setbacks of 60-100 metres for exposed or eroding coastal areas. We also support restrictions on vegetation removal from riparian buffer zones (Section 2.3.3 Policy E-16).***

Save Bedford's waterfront is very concerned with the following as it directly affects our community, environment and our waterfront:

*Halifax Harbour (Section 2.3.3, Policy E-17). **Within the current plan, Halifax Harbour is exempt from watercourse buffer requirements/ Halifax Harbour is a large, complex, and diverse part of HRM. How can this be? Within the current Harbour Zone are residential, commercial or natural areas that non-industrial and do not host marine dependent activities. This includes, but is not limited to, areas such as Bedford Waterfront, North West Arm, Mill Cove, Cow Bay and Eastern Passage, the former DND lands. Watercourse buffers and setbacks should be required in these areas just as they are around other HRM watercourses!***

For those of you that may still be under the assumption that there is no natural pre-existing shoreline left on the Western Shore of Bedford basin, that assumption is wrong. There is and it needs protection.

*Development Agreements and as-of-right development (Section 2.3.3 E-18). Under RP5, Riparian agreements. **buffers are not required for as-of-right development, and need only be “considered” for development***

*We believe riparian buffers should be required **for all developments** adjacent to a watercourse.*

“Grandfathering” riparian buffer requirements (Section 2.3.3, Policy E-19). The proposed changes to RP-5 calls for relaxing riparian by-law requirements on lots in existence before this plan came into effect in 2006. Save Bedford Waterfront Society thinks there should be absolutely no relaxation of buffer requirements, particularly on lots that are not suitable for development such on floodplains, or low lying coastal areas!

Many aspects of the plan need more consideration and certainly more community input:

a) Growth strategy

b) Greenbelting

c) Transportation

d) Community engagement

e) Water buffer zones

We believe that these sections of the Plan cannot be dealt with internally by the Halifax Regional Municipality (HRM) administration. They are to do with the very nature of HRM and how it reflects community values, not technical issues. It is not reasonable to wait for the public hearing, and expect informed community discussion and creative debate to inform council’s decision in the fall.

Clause G-16** is an overt loophole designed to be exploited by developers and removes protection for our Urban Reserve lands. **Clause G16 must be deleted.

*The Stantec Consulting report, provided to HRM Council, recommended **a growth target of 50% urban, 25% suburban and 25% rural**, in order to save the city \$3 billion over 18 years. Council should act in the best interests HRM taxpayers, heed this advice, and incorporate this as an **accountable** target in the RP+5. **The 25% urban, 50% suburban and 25% rural development target must be deleted.***

The concept of "greenbelting" should be clearly defined in RP+5 and specific areas of HRM should be protected from development under this designation.

Please let it be documented that we are very dissatisfied with the proposed Regional plan as it stands now, and are opposed to it. Please listen to the people and community groups in your city and make the positive changes. We have copied our councilor & our MLA on this as well.

Best,

Sandra Banfield

VP -Save Bedford's Waterfront Society

-End Attachment-

Reference # 3.32

From: Stephen Grace

Sent: July 18, 2013 8:38:13 PM (UTC-04:00) Atlantic Time (Canada)

To: Corser, Susan; Tota, Kasia; Regional Planning Office, HRM; Mayor

Cc: Outhit, Tim; kelly@kellyregan.ca

Subject: Bedford Waterfront - Do it right... Cease the urban Sprawl

Dear Mayor & Community Development advisory Council,

I feel very strongly regarding this issue of urban sprawl blighting the area of the Bedford Basin. Please hear all of our voices and ensure that any development in this area benefits the entire community and not just the developers. The proposed development needs to be halted and reassessed.

The remainder is a reproduction of the Save the Bedford Waterfront Societies message which clearly states all of the issues.

Thank you for your time

Stephen Grace

-Begin Attachment-

I am writing to provide input for the proposed Regional Plan (RP+5) document and in particular to let you know that Save Bedford's Waterfront society is very concerned that RP+5 heavily favors the interests of the developers, rather than protecting the best interests of HRM taxpayers & preservation of our urban wilderness areas, coastal waterways and harbour areas. As a member of the larger " Our HRM Alliance" group, the "Save Bedford's Waterfront Society" shares concerns expressed by our allies that the revised HRM Regional Plan does not adequately tackle crucial issues such as sprawl, affordable housing, transportation & green-beltting, preservation of the environment & proper water buffer zones.

The MP-5 offers a few encouraging commitments towards keep Nova Scotia's coastal areas & freshwater ecosystems healthy and productive. These include the proposed water supply protection zone, and stricter restrictions around clearing vegetation around watercourses in riparian buffer zones. However, despite this, RP+5 proposes changes that will further weaken existing water and coastal policies and by-laws and have grave consequences on water quality.

While we support a renewed commitment to riparian buffer zones around all water bodies (Section 2.3.3, Policy E-16) - we still feel strongly that a 30 metre buffer zone should be considered around all fresh water bodies, and wider setbacks of 60 - 100 metres for exposed or eroding coastal areas. We also support restrictions on vegetation removal from riparian buffer zones (Section 2.3.3 Policy E-16).

Save Bedford's waterfront is very concerned with the following as it directly affects our community, environment and our waterfront:

Halifax Harbour (Section 2.3.3, Policy E-17). **Within the current plan, Halifax Harbour is exempt from watercourse buffer requirements/ Halifax Harbour is a large, complex, and diverse part of HRM.** How can this be? Within the current Harbour Zone are residential, commercial or natural areas that non-industrial and do not host marine dependent activities. This includes, but is not limited to, areas such as **Bedford Waterfront**, North West Arm, Mill Cove, Cow Bay and Eastern Passage, the former DND lands.

Watercourse buffers and setbacks should be required in these areas just as they are around other HRM watercourses!

For those of you that may still be under the assumption that there is no natural pre-existing shoreline left on the Western Shore of Bedford basin, that assumption is wrong. There is and it needs protection.

Development Agreements and as-of-right development (Section 2.3.3 E-18). Under RP5, Riparian agreements. **buffers are not required for as-of-right development, and need only be “considered” for development**

We believe riparian buffers should be required **for all developments** adjacent to a watercourse.

“Grandfathering” riparian buffer requirements (Section 2.3.3, Policy E-19). The proposed changes to RP-5 calls for relaxing riparian by-law requirements on lots in existence before this plan came into effect in 2006. Save Bedford Waterfront Society thinks there should be absolutely no relaxation of buffer requirements, particularly on lots that are not suitable for development such on floodplains, or low lying coastal areas!

Many aspects of the plan need more consideration and certainly more community input:

- a) Growth strategy
- b) Greenbelting
- c) Transportation
- d) Community engagement
- e) Water buffer zones

We believe that these sections of the Plan cannot be dealt with internally by the Halifax Regional Municipality (HRM) administration. They are to do with the very nature of HRM and how it reflects community values, not technical issues. It is not reasonable to wait for the public hearing, and expect informed community discussion and creative debate to inform council’s decision in the fall.

Clause G-16 is an overt loophole designed to be exploited by developers and removes protection for our Urban Reserve lands. **Clause G16 must be deleted.**

The Stantec Consulting report, provided to HRM Council, recommended **a growth target of 50% urban, 25% suburban and 25% rural**, in order to save the city \$3 billion over 18 years. Council should act in the best interests HRM taxpayers, heed this advice, and incorporate this as an **accountable target** in the RP+5. **The 25% urban, 50% suburban and 25% rural development target must be deleted.**

The concept of "greenbelting" should be clearly defined in RP+5 and specific areas of HRM should be protected from development under this designation.

Please let it be documented that we are very dissatisfied with the proposed Regional plan as it stands now, and are opposed to it. Please listen to the people and community groups in your city and make the positive changes. We have copied our councilor & our MLA on this as well.

*Best,
Sandra Banfield
VP -Save Bedford's Waterfront Society*

-End attachment-

Reference # 3.33

July 18, 2013

To: Members of the Community Design Advisory Committee
Halifax Regional Municipality
Clerk's Office

Re: RP+5 plan amendments and the Urban Reserve designation

Dear Members,

You will recall that a letter was sent from the William's Lake Conservation Company regarding Implementation Policy -18 which exists in the current plan. A copy of the letter dated March 19 is attached for your convenience.

We are extremely disappointed to find this policy in the second draft of the plan. Specifically, it is now referred to as Policy G-16 found at page 99 in the section titled '9.7 Discretionary Approvals'.

As stated in our earlier letter, the Urban Reserve designation is significantly compromised by giving Council the discretion to extend land use designations where Urban Reserve property abutts land with different designations. The effect of this ability runs counter to the purpose of the plan which is to create certainty.

We are again requesting that the committee consider amendments to ensure that Policy G-16 does not apply to the Urban Reserve lands until such time as it can be demonstrated that no more developable land within the existing service boundary is available. This will assist in ensuring that land close to the urban core that is undeveloped will be available for a greenbelting strategy that will help make ours a first class city.

Thank you for your consideration.

Kathleen J Hall
on behalf of the William's Lake Conservation Company

Reference # 3.34

Comments on the Draft Chapter 7, Culture and Heritage, of the Regional Plan Review:

The Heritage Trust has examined the draft revised chapter on Culture and Heritage, and has compared it with the aims of the Heritage Property Act, and with the heritage policies in the various Secondary Planning Strategies in the Municipality. We find that the chapter could be substantially improved by including ideas and policies from these other documents. We see two significant benefits from including these policies in the Regional Plan. First, it is important that all heritage and cultural resources in the municipality have the same protections and be treated equally. Second, Chapter 6, as currently drafted, proposes to rescind the Secondary Planning Strategies, including their heritage policies, in the Regional Centre. It is urgent that these policies be moved into the Regional Plan, so that these valuable concepts and practices will continue to serve the Municipality.

Accordingly, we have gone through the various Secondary Planning Strategies. We have grouped the heritage policies according to their purpose. We have combined similar policies, deleted local references, and paraphrased the policies so that they apply to the entire municipality. The objective is to have a concordance of the best practices from the various areas of the Municipality.

We have also made some comments on the present text of the draft chapter.

The Culture and Heritage Chapter should address each of the aims of the Heritage Property Act: “identification”, “designation” and “preservation, conservation, protection and rehabilitation”. We have organized our comments under each of these aims, as follows.

1. Identification:

“Identification” is mentioned in draft Policy CH-2, but this just refers to a little-known and very general document from 2005. There should be a clearly stated policy to seek out potential heritage and cultural resources. The following is a draft policy combining and paraphrasing Policy HR-1 from the Chebucto Peninsula Secondary Planning Strategy and Policy 37 from the Downtown Halifax Secondary Planning Strategy (DHSPS):

“It shall be the intention of Council to develop, in conjunction with local heritage groups, the Heritage Advisory Committee, and Nova Scotia Department of Tourism and Culture, an inventory of properties that have potential for registration as municipal heritage properties or inclusion in municipal heritage conservation districts, and to evaluate these properties for registration with a municipal heritage designation.”

2. Designation:

“Designation” is not dealt with in the current draft of Chapter 7. There are four steps needed for designation. A set of criteria is needed so that all properties can be compared fairly. The Heritage Advisory Committee needs to evaluate each identified property against the criteria. The municipality needs to work with the owners of the properties to explain the implications of registration. In some cases, this step will occur earlier, particularly if the owners have nominated the property for registration. Finally, Council must consider the property for designation.

A suitable policy on criteria and evaluation may be obtained by paraphrasing Policy H-3 from the Downtown Dartmouth Secondary Planning Strategy (DDSPS), as follows:

“Appropriate criteria shall be maintained by which the municipality shall continue to evaluate properties or districts in the inventory, as well as properties or districts nominated by members of the public, for designation as municipal heritage properties or heritage conservation districts.”

Policy 38 from the DHSPS deals with contact with property owners, and may be extended to the whole Municipality:

“HRM may proactively encourage new heritage property registrations by means of public education through publications, workshops, registration campaigns, and direct contact with potential heritage property owners.”

Policy H-4 of the DDSPS and Policy 6.2 in the Halifax Municipal Planning Strategy (HMPS) deal with designation, and may be combined as follows:

“The Municipality should designate those properties which meet the adopted criteria as registered heritage properties or registered heritage conservation districts.”

3. Preservation, conservation, protection and rehabilitation:

There is no clear policy in the current draft of Chapter 7 calling for the “preservation, conservation, protection and rehabilitation” of the resources that are designated. Such a policy should be added and should be the core of the chapter. Policy H-1 in the DDSPS and Policy 6.1 in the HMPS would be good models to follow. Here is a paraphrase of these policies:

“The Municipality shall seek the retention, preservation, rehabilitation and/or restoration of those areas, sites, streetscapes, structures, and conditions such as views which impart a sense of the community’s heritage, particularly those which are relevant to important occasions, eras, or personages, or which are architecturally significant, or are of a significant age.”

Once there is a clear statement, as above, favouring conservation, then the means to achieve conservation need to be considered. There are two sides to this. One is encouragement or

inducement, several aspects of which are discussed in item 4 below. The other is regulation, which is discussed in items 5 and 6.

4. Encouragement and Inducements:

The communities in HRM have had many good ways of protecting heritage resources. Many of the good ideas from Secondary Planning Strategies should be shared with the whole municipality by adopting them in the Regional Plan. This is particularly important as HRM is considering rescinding many of the Secondary Planning Strategies and replacing them by a Centre Plan. They are paraphrased below:

a. Budget:

The Municipality has various programs that support retention of heritage properties and buildings in heritage conservation districts. These programs need budgetary support. A policy favouring such support is desirable. Here is a paraphrase of policy 6.5 from the HMPS:

“The Municipality shall budget an annual amount to ensure that a fund is available should purchase or other financial involvement be considered by the Municipality for a registered heritage property.”

b. Financial Incentives:

The DHSPS contains Policy 41 regarding financial incentives. Incentives are currently available in other areas. This should be indicated in the Regional Plan by including the policy in the plan, as follows:

“It shall be the intention of HRM to provide financial incentives for the restoration and renovation of municipally registered heritage properties and properties in heritage conservation districts subject to availability of funds and the annual budget process.”

c. Conservation Easements:

A conservation easement was used to protect the façade of the NFB Building on Barrington Street. Here is a paraphrase of Policy 6.4.2 from the HMPS:

“The Municipality shall study the use of preservation easements and restrictive covenants to determine the extent to which they can be used in the preservation of registered heritage properties.”

d. Acquisition:

The Heritage Property Act gives municipalities the power to purchase heritage properties in order to protect them. The former Town of Bedford bought the Fort Sackville Manor House in order to protect it. A paraphrase of Policy 6.4.3 from the HMPS follows:

“The Municipality shall consider acquisition of registered heritage properties whenever acquisition is the most appropriate means to ensure their preservation.”

e. Municipal use:

Conservation of a heritage property requires that it have a use. HRM occupies a substantial amount of floor space for its own uses. HRM can set a good example by using space in heritage buildings for its own use. Here is a paraphrase of Policy 6.6 in the HMPS:

“In the purchase or lease of space for its own use, the Municipality shall first consider accommodation in designated heritage structures.”

f. Disposal:

Sometimes the Municipality may consider selling a property, such as a surplus school. In such cases, the Municipality should set a good example by considering the heritage value of the property. Policy H-9 of the DDSPPS could be extended to the whole municipality:

“Prior to selling or otherwise disposing of any surplus municipal property which may have heritage significance, an evaluation of the property shall be carried out to determine the level of significance, if any. Where the surplus property is of significance, measures shall be undertaken to ensure the retention of the building to the greatest reasonable extent through heritage registration, restrictive covenants or other appropriate means.”

g. Development Agreements:

Owners of heritage properties in Halifax and Dartmouth are currently permitted to apply for a development agreement to change the use, where this will assist in the preservation of the building. It is desirable to extend this right to the owners of heritage properties in the rest of the Municipality. This can be accomplished by adding a policy to the Regional Plan, by paraphrasing and combining Policy H-10 from the DDSPPS, Policy IP-15 from the Dartmouth Municipal Planning Strategy (DMPS) and Policy 6.8 from the HMPS, as follows:

“Council may encourage the reuse, restoration and retention of registered heritage properties by allowing for an increase in development rights for registered heritage properties, where it can be demonstrated that the limits on the uses allowed by the land use by-law are an impediment to retention of the property. Internal conversions of registered heritage properties to accommodate uses not otherwise permitted may be considered through the development agreement process. In considering any requests, the following criteria shall be satisfied:

- a) the limits on the uses allowed by the land use by-law are shown to be an impediment to the building’s retention;
- b) the building is suitable for conversion, in terms of building size, and the nature of the proposed use;

c) adequate measures are proposed to ensure the continued protection of the building as a registered heritage property, and that alterations and additions to the building are consistent with the intent of the Heritage Building Conservation Standards, and that any registered heritage building covered by the agreement shall not be altered in any way to diminish its heritage value;

d) no additions of greater than ten percent (10%) of the footprint area of the building are proposed; and that all additions including wheelchair ramps, fire escapes and emergency exits are designed to be as compatible as possible with the exterior of the building;

e) adequate measures are proposed to minimize impacts on abutting properties and the streetscape as a whole as a result of traffic generation, noise, hours of operation, parking requirements and such other land use impacts as may be generated as part of a development;

f) the placement and design of parking areas, lighting and signs, and landscaping is in keeping with the heritage character of the building; and

g) where applicable, the proposal should include an assessment and strategy to protect significant on-site archeological resources which may be impacted by the proposed development.”

h. Provincial protection:

The Province can be a valuable partner in protection of heritage. The following policy combines Policy HC-4 from the Bedford Secondary Planning Strategy and Policy 36 from the DHSPPS:

“HRM shall pursue opportunities to work co-operatively with the Province of Nova Scotia in accordance with the strategic directions and key initiatives identified in the Heritage Strategy for Nova Scotia, and in particular to secure provincial designation of heritage properties in the Municipality, strengthened legislative heritage protection and improved funding for heritage, including tax incentives.

i. Interpretation:

Policy H-14 in the DDSPPS proposes a heritage walk in Downtown Dartmouth. This would assist with public education, and could be extended to the rest of the Municipality, as in the following paraphrase of that policy:

“Heritage walks should be developed to provide appropriate directional and interpretive signs and promotional materials pertaining to the built heritage, and the cultural, industrial and natural histories of the community.”

5. Standards:

Draft Policy CH-5 proposes **adopting** the federal Standards and Guidelines for the Conservation of Historic Places in Canada. This is an improvement over the previous draft, which proposed **replacing** the time-tested municipal Heritage Building Conservation Standards. The municipal

Standards are more general than the federal ones. For example, municipal Standard 2 states: “The **historic character** of the property shall be retained and preserved. The removal of **historic materials** or alteration of features and spaces that characterize the property shall be avoided.” This is **more inclusive** than anything in the federal Standards and Guidelines. It is written in language that a layperson can readily understand. There is no need for a predetermined list of historic materials or historic character; these can be determined at the time an application is being made or reviewed.

It would be a further improvement to indicate that both sets of Standards will apply, at least until HRM can complete the list in our next recommendation. This could be accomplished by adding the following words to the second line of draft Policy CH-5, after the word, Canada: “in addition to the Heritage Building Conservation Standards”.

6. Character Defining Elements:

The federal Standards, in two pages, refer 16 times to “**character-defining elements**”. To apply the federal Standards then, one must have a list of character-defining elements to check. Unfortunately, **HRM does not have a list of character-defining elements for many Municipal Heritage Properties**. For other Municipal Heritage Properties, the list of elements is incomplete, often because it is based on one photograph of only one elevation. Interesting features on other elevations or on the roof have not been written down. We recommend that HRM include a policy in the Regional Plan to **prepare a list** of character-defining elements for each of the 470 municipal heritage properties. Here is a paraphrase of Policy 37 from the Downtown Halifax Secondary Planning Strategy (DHSPS):
 “HRM shall update the Registry of Heritage Properties by developing statements of significance, statements of heritage value, and lists of character defining elements for each registered heritage property.”

7. Museums:

Museums are an important resource for the heritage and culture of the municipality. In many cases the museums have been established and operated by dedicated groups of volunteers. The Downtown Dartmouth Secondary Planning Strategy includes Policy H-13, which encourages protection of local museums. This policy should be extended to the other museums in the Municipality:

“In order to ensure the presence of a continued heritage display and interpretation programs in the community, all possible means to maintain existing museums shall be explored.”

8. Abutting Development:

Policy CH-13, regarding development abutting registered heritage properties, should be strengthened. In line 5 the word “compatible” should be replaced by the word “harmonious”. A new clause (a) should be inserted: “The careful use of materials, colour, proportion, and the

rhythm established by surface and structural elements should reinforce those same aspects of the existing buildings.” In (a)(iii), line 3, after “street wall”, insert the words “and abutting heritage properties”. At the end of clause (c), insert the words “and heritage resources”. In the preamble to this policy, the negative comments about replication should be dropped, so the last sentence would read, “It is the intent of this policy to require innovative design solutions that incorporate architecture, place-making, and material selection of the highest quality that are appropriate in relation to their abutting neighbours.”

Downtown Dartmouth Policy H-7 should be extended to the rest of the Municipality:

“All proposals for development agreements involving exterior alterations on properties adjacent to registered heritage properties shall be forwarded to the Heritage Advisory Committee for review and comment on how the proposal impacts on local heritage resources.”

9. Staff Priority:

It is not clear that lumping together the Heritage Functional Plan and the Cultural Functional Plan, as in proposed Policy CH-3, would be effective. The larger document may take longer to produce than the individual documents. **A higher priority for staff time should be the Heritage Conservation Districts.**

10. Consideration or Action:

The policies in the draft Chapter 7 repeatedly use the words “consider”, “considered”, and “considering”. These words are weak. The Utility and Review Board overturned a decision of HRM Council by arguing that the words “give consideration to” were too weak to allow HRM to deny a development agreement. For example, in draft Policy CH-5(a), “considered” should be changed to “followed”. In draft Policy CH-11, “Shall consider maintaining” should be changed to “should maintain”. In draft Policy CH-13, line 6, “considering” should be changed to “requiring”.

11. Exempting Downtown:

Policy CH-14, exempting Downtown Halifax from Policy CH-13, should be deleted. Compatible development is just as important in the downtown.

12. Exempting New Architecture:

Policy CH-15(d), regarding “exceptional new architecture”, should be deleted; we should not plan for exceptions.

13. Grammar:

“Culture” is often used as an adjective. This should be replaced by “cultural” wherever it is used as an adjective.

14. Focus:

Section 7.1, Objective 1: The words, “viability of”, should be deleted. “Resources” should be preserved and enhanced, not just their viability.

Reference # 3.35

From: Jordi Higgins

Sent: July 15, 2013 11:45:00 AM (UTC-04:00) Atlantic Time (Canada)

To: Regional Planning Office, HRM

Cc: McCluskey, Gloria

Subject: Proposed Regional Plan - Lyngby Avenue

Dear Regional Planning Team,

I was just made aware that the new proposed Regional Plan designates Lyngby Avenue in Dartmouth a Collector Street. This seems to be a change from the 2006 plan. I have small children, as do many of my neighbors and I am very concerned about what this new designation will mean to my family and my neighborhoods' safety. The idea that this change would result in more traffic flowing through the heart of the neighborhood is gravely concerning. I would appreciate clarification on what this designation could mean. I have copied our Councilor, Gloria McCluskey who I understand also sits on the Community Design Advisory Committee.

Thank you for your time.

Sincerely,

Jordi Higgins

Reference # 3.36

From: Will Hill

Sent: July 17, 2013 12:30:10 PM (UTC-04:00) Atlantic Time (Canada)

To: Regional Planning Office, HRM

Subject: Second Draft of Regional Plan for Halifax

I am writing as a concerned citizen with respect to the second draft of the Regional Plan. It is deeply concerning that the first regional plan makes no mention of food security issues in the HRM. At a grassroots level, there are dozens of local initiatives working to produce good food that is more sustainable, healthy and affordable to diverse communities across the region.

Any regional plan that deals with the well-being of its constituents must take into consideration how food is produced, consumed and sold within its confines. It must consider both the livelihoods of our rural farmers as well as the well-being of our most vulnerable urban communities. Producers have a right to earn a fair living, and low-income residents have a right to high quality food.

Food security issues MUST be part of the second draft of the regional plan.

Will Fawcett Hill

Concerned Citizen

Community Gardener

Social Justice Advocate

Reference # 3.37

To HRM Planning,

My name is Nancy Hunter. I am a life long resident of Halifax. My family goes back many generations in Halifax and Nova Scotia. It is my home and I choose to live here because I love it. I especially love the fact that we are both urban and rural co-existing. Nature is never more than 10-20 minutes away from a downtown café. How many places on earth can boast this?

And now a rare and beautiful urban wilderness, the Williams Lake/Purcell's Cove Backlands, so precious in this day and age could be decimated for yet another- dime a dozen - suburban development. Suburban developments are easy. There are lots of them – verging now on too many. Urban reserves are few and could possibly be zero without the advocacy of HRM.

We need the HRM to protect this land. To stand up for its citizens. NOBODY wants this development. We want to save this land forever for all our residents.

I care deeply about this city.

I am asking HRM to support the wishes of its citizens and act in the best interest of this city and its future generations.

Once this is gone it is gone FOREVER. HRM has the opportunity to take a stand to not only protect this wilderness for generations to come, but to be smart and forward thinking in its future development. We don't have the endless natural resources we used to have. We are facing environmental challenges. We need to plan now. We need to change our approach to development. We need to increase urban development, revitalize our cities and decrease suburban sprawl.

Why wouldn't you want to protect the Williams Lake/Purcell's Cove Backlands?????

Put Halifax on the map for having a protected urban wilderness – complete with animals, lakes and trails. Think of the possibilities for tourism, recreation and bragging rights when VIPS come to town. Ensuring an Urban Reserve is something to be proud of it – a substantive, real legacy.

Please don't let our great city devolve into 1970's thinking - into a suburban wasteland of unmanageable traffic.

Please be smart! Please protect nature! Please keep our city special and unique! Please don't ruin our urban wilderness! Do the right thing!!!!!!!!!!

1. Remove all loopholes i.e. -G16 that potentially remove the urban reserve protections.

2. Designate the Williams Lake/Purcell's Cove Backlands as a permanently protected area.
3. Ensure all planning processes have REAL community input and keep the best interests of the city and its residents as a priority.

Once it is gone- it is gone. It is in the hands of HRM to do the right thing.

Sincerely,

Nancy Hunter

Reference # 3.38

From: richardjohn
Sent: July 18, 2013 11:16:04 AM (UTC-04:00) Atlantic Time (Canada)
To: Regional Planning Office, HRM; purcellscovearea1@gmail.com
Subject: Comments on HRM Regional Plan (RP+5)

Dear Council Members,

I am writing as a long-time resident of Halifax. My wife and I own a home on Purcells Cove Rd, and we have attended many recent meetings about development, including the HRM RP+5 planning meeting in Dartmouth on June 17.

There are some obvious flaws in the plan--please don't make these mistakes. Halifax has the potential to be a truly great city, but not if we keep caving in to weak development guidelines. (Remember the kind of thinking that produced the bizarre Cogswell interchange, and almost gave us a Toronto-style nightmare with a highway along the harbour!)

1. As I recall, there was a recommendation from Stantec Consulting that growth targets should be 50% urban, 25% suburban, and 25% suburban. It would be wise to adhere to these principles, which you already established: more emphasis on the urban core, and less unnecessary (and expensive for HRM) sprawl.

2. In the plan, clause G-16 is a mistake. Please stick with the guidelines and not make re-designation so easy--this doesn't fool anyone.

3. Greenbelting is a wonderful idea that has been around for over a century, and many cities in the US and UK have benefited from it. Instead of just talking about it, let's make it a real plan. The recent furor arose because of very suspect plans to develop the backlands around Williams Lake, and—amazingly—try to get residents of Areas 1 and 2 to pay for hugely expensive water and sewer that virtually nobody wants!

Williams Lake is a wonderful opportunity to establish a genuine greenbelt, that will benefit the environment and the entire city for decades to come.

Turning it into another Clayton Park would be unfortunate and unnecessary.

Thank you for considering these thoughts, and for all your hard work,
Richard John

Reference # 3.39

From: Carole Jones
Sent: July 17, 2013 6:07:21 AM (UTC-04:00) Atlantic Time (Canada)
To: Regional Planning Office, HRM
Cc: purcellscovearea1@gmail.com
Subject: development plan for Purcells Cove area

Dear Sir/Madam,

I am writing to provide input for the proposed Regional Plan (RP+5) document and, in particular, to raise my concerns that RP+5 heavily favors the interests of developers, rather than protecting the best interests of HRM taxpayers and preserving our urban wilderness areas (such as the Purcell's Cove/Williams Lake Backlands).

Specifically:

1) Clause G-16 is an overt loophole designed to be exploited by developers and removes protection for our Urban Reserve lands. **Clause G16 must be deleted.**

2) The Stantec Consulting report, provided to HRM Council, recommended **a growth target of 50% urban, 25% suburban and 25% rural**, in order to save the city \$3 billion over 18 years. Council should act in the best interests HRM taxpayers, heed this advice, and incorporate this as an **accountable** target in the RP+5. **The 25% urban, 50% suburban and 25% rural development target must be deleted.**

3) **The concept of "greenbelting" should be clearly defined in RP+5 and specific areas of HRM should be protected from development under this designation.** In particular, the Purcell's Cove/Williams Lake Backlands should be a protected corridor, designated as a greenbelt area, that should be completely off-limits to development.

Sincerely,

Carole Jones

Reference # 3.40

From: deborahjs

Sent: July 18, 2013 11:37:46 AM (UTC-04:00) Atlantic Time (Canada)

To: Regional Planning Office, HRM

Subject: feed back re plan revisions

Dear Sir/Madam,

I am writing to provide input for the proposed Regional Plan (RP+5) document and, in particular, to raise my concerns that RP+5 heavily favors the interests of developers, rather than protecting the best interests of HRM taxpayers and preserving our urban wilderness areas (such as the Purcell's Cove/Williams Lake Backlands).

Specifically:

1) Clause G-16 is an overt loophole designed to be exploited by developers and removes protection for our Urban Reserve lands. **Clause G16 must be deleted.**

2) The Stantec Consulting report, provided to HRM Council, recommended **a growth target of 50% urban, 25% suburban and 25% rural**, in order to save the city \$3 billion over 18 years. Council should act in the best interests HRM taxpayers, heed this advice, and incorporate this as an **accountable** target in the RP+5. **The 25% urban, 50% suburban and 25% rural development target must be deleted.**

3) **The concept of "greenbelting" should be clearly defined in RP+5 and specific areas of HRM should be protected from development under this designation.** In particular, the Purcell's Cove/Williams Lake Backlands should be a protected corridor, designated as a greenbelt area, that should be completely off-limits to development.

Sincerely,

Deborah Jones

Reference # 3.41

From: Katherine Kitching
Sent: July 6, 2013 9:57:50 PM (UTC-04:00) Atlantic Time (Canada)
To: Regional Planning Office, HRM
Cc: Watts, Jennifer
Subject: Comments on Draft 2 of Regional Plan

Hello-

I was out of the province for June, unfortunately, and could not make it to any of the in-person final round of consultation meetings for the regional plan - (I really appreciate your public consultation process and would have liked to participate in person!).

Therefore I'd like to submit the following written comments regarding the plan. If you are interested in the demographics of your respondents, I am also happy to provide the following information about myself:

1. I am in my mid-30s and am a part-time employee at SMU and also a small business owner.
2. I live on the peninsula (in the north end)
3. I am an active transportation advocate and "practitioner" - I choose not to own a car and I bus, walk and bike to my engagements.
4. I am an outdoor enthusiast and I use parks and green spaces within and outside of HRM at least twice a week.
5. I love the City of Halifax. I chose to move here from Ontario and make my life here because to me, it is the greatest city in Canada. I plan to live here for the rest of my life and raise a family here.

GENERAL COMMENTS:

First of all, I'd like to thank the design review committee and the HRM planners for all their work - I attended one meeting as an observer, and was extremely impressed on the enormous work of listening, discussing and consensus building that has evidently been done. Thank you!

Secondly, the guiding principles listed at the start of the document are very good, in my view- and I commend HRM and everyone who has worked on the plan for establishing them.

On that note, during the final review I urge you to seriously consider whether the plan has enough "teeth" to be able to fulfill all the principles as they are currently laid out. If you feel, deep down in your heart, that the measures in the plan as it stands right now are not "toothy" enough to ensure these principles are met, then I ask you to strengthen the plan as needed! I will be bitterly disappointed if, in the next 25 years, I see development happening in the region that appears to contravene these principles. I know there have

been some frustrations with HRM By Design in the downtown core, with respect to whether developments being considered (e.g. convention centre, Skye) have actually been in line with HRMBD - and I hope you will do what you can to ensure this will not happen with the Regional Plan.

Now, some more specific comments:

CONCERN ABOUT SELECT URBAN RESERVE LANDS

One of my biggest concerns is the designation of lands on both the northeastern and southwestern sides of Susie Lake -- and the designation of lands between and to the southeast of Williams and Colpitt Lakes, as "**Urban Reserve**".

In my view, these lands should be instead designated as "**Open Space / Natural Resource**".

Please consider: the Suzy lake and Williams-Colpitt areas are some of the only remaining large-scale wilderness areas that are within easy cycling or busing distance for Peninsula residents. They are also incredible natural treasures for the communities that currently exist beside them.

For me, one of the best things about peninsular Halifax is that clean, beautiful wilderness surrounds it on all sides - this is such a rare treasure for the urban core of a (relatively) big City. In my view, it be a tragedy if these two forested areas were lost.

Therefore, I would strongly encourage you to think of future generations' enjoyment and access to these treasured spaces, and rezone these two areas so that they cannot be later opened for development.

CONCERN WITH WEAKNESS OF MEASURES TO LIMIT SUBURBAN GROWTH

I read over parts of the Stantec report, and I am strongly in favour of going with their "best scenario", which is to focus **40-50% of future growth in the regional centre**, while trying very hard to reduce the amount of suburban growth, compared to what is laid out in the draft plan.

To this end, I would like to see more aggressive measures put in place in this plan, in order to make it far more expensive to develop in suburban areas vs. urban ones. As I understand it, such measures have been used effectively in other areas of Canada. I also like what Our HRM Alliance has to say about Greenbelting, and I think **Greenbelts should be used to protect recreational and wilderness areas while clearly defining the areas where human settlement can occur**-- rather than only being used as a tool to connect wildlife habitat and recreation corridors, which seems to be the main thrust of Greenbelting as it is described in the draft plan right now.

CONCERN/QUESTION RE HYBRID CONSERVATION DESIGN DESIGNATION

Regarding Conservation Design Developments - I have visited communities where the Hybrid Conservation Design designation has been used, and I like the resulting natural aesthetic - but I am concerned about the power for abuse it leaves in the hands of the individual property owners. I would like to know whether there is something in the Plan and/or our bylaws that actually allows for regular checking and enforcement of the Hybrid designation's application in areas that have been settled.

I have spent some time visiting relatives in Glen Arbour (Hammonds PLains), for example, and it is evident that some residents have slowly, over time, begun to disregard the designation applied to their properties - there are people who have cut down trees and planted lawns in what is supposed to be a naturalized portion of their lot, as well as building infrastructure right down to the water's edge instead of respecting the riparian buffer zones.

It is all well and good to require a developer to respect a Hybrid Conservation Design when developing an area- but what is HRM doing, and what will it do in the future, to ensure these designations are held up in the long term by property owners? If this can't be ensured, then I think it's better to go with protecting communal lands in the community (i.e. the other two conservation designations).

HOUSING AFFORDABILITY

While recognizing that affordability is largely the province's domain, I still feel the City can and should be doing more than what is laid out in the draft plan to promote the development and long-term sustainability of affordable units.

First off, I must say I am glad to see section S-34 and S-37 included, but I wish they were stronger - rather than simply "investigating" ways of giving incentives, tax breaks or waiving fees for developers of affordable housing, I would like to see HRM commit to doing these things! As far as I understand these mechanisms are already in place in other cities (such as Ottawa?) so I am uncertain as to why we cannot commit to them here in HRM right now.

I would also like to question the idea of "density bonusing" for affordable units. I feel this is weak. Rather than rewarding developers for providing affordable units, I would like to see HRM **require** that all developments over a certain size include a percentage of affordable units. Is it not true that Winnipeg is undertaking this approach?

If the City plans to take part in future affordable housing initiatives, then I think they should also be more specific and clear about how these affordable units would be priced, and how they will be managed: I have heard some disappointing stories about supposed affordable units that have been included in developments here in HRM already, and what has happened to them as time goes on (either they stop being affordable over time, or they were never really affordable in the first place, just "relatively" affordable compared to the other units in the building).

ROAD NETWORK PROJECTS

I would like to state that I am strongly against any new major and expensive road infrastructure projects that are geared to improving traffic flow in HRM. I had hoped that this forward-thinking, smart-growth-focused, environmentally sustainable-oriented plan would have done away with plans for road widenings and additional bridge crossings!

How do we expect people to be motivated to switch to transit and active transportation if we continue to make their driving experience better and easier? I think it is a good thing that the bridges are clogged with cars during rush hour - it provides an incentive for commuters to seek alternatives. Also, clearly the more money we spend on road infrastructure (and these are very expensive projects we're talking about!), the less money is available to invest in a world-class transit system and top-notch active transportation infrastructure.

I would also like to comment specifically on section T-12-I very much disagree with the premise that we "must" control congestion to ensure it does not surpass existing levels. Yes, it is clear that Halifax's population will grow. But just because we will welcome more people to HRM does not necessarily mean we need to welcome more drivers: please let's leave the roads as they are, and allow them to get more congested!

It is my belief that people will only take a serious look at where they live and where they work and how they will travel between these places if they know congestion is a major issue. Even if we make cycling and transit infrastructure better, if we also make road infrastructure better than driving will continue to remain the preferred option - it's door-to-door, you don't get sweaty or wet, and you can travel exactly on your own schedule.

Please remember: "If you build it they will come". So let's not build it (more roads), and then our would-be drivers will be forced to find other options!

In particular, and for the reasons outlined above, (plus a general desire to have only beautiful, quiet, unpolluted communities in HRM) I am against widening Bayers Road, Herring Cove Road, and Barrington Street. These roads are already loud, unpleasant and unsafe feeling - please let us not make them more so! If there is money to be used for widening, let us use it instead to make dedicated bike and bus lanes on those streets.

I'd also like to say that I am **strongly** against a third harbour crossing from Woodside - it is hard to imagine how this could have anything but a negative impact on the beautiful south end waterfront! I currently live near the MacDonald bridge, and I lament every day that I cannot enjoy the waterfront in my end of town because of the infrastructure that blocks access to the water, and the horrible traffic noise and smell that makes walking over the bridge most unpleasant. I love to go down to the south end to enjoy the quiet waterfront and big open sky there - and it would break my heart to have a bridge or tunnel mar it in any way.

TRANSIT AND ACTIVE TRANSPORTATION

I am a strong supporter of improved transit and active transportation infrastructure, and a strong supporter of greater investment in public transit and active transportation. The principles within the current draft seem to point things in the right direction, and I encourage you to give these parts even more "teeth", so that they have the best chance of being realized.

For example, right now you say that Transit Priority Measures "may be made". Why the "may"? Why wouldn't we commit to making them? Is it not widely recognized that these measures are a good idea if we want to have a world-class transit system?

ECONOMIC GROWTH

I felt a bit uncomfortable when I read section 5.1.6 - "Ensure that there are sufficient lands available around the harbour and in business parks to provide economic opportunities;" Is this not a dangerous phrase, all by itself? To me, it sounds like it could be used to trump other objectives of the plan. I would like to see this objective be balanced with a counter-phrase - for example, something like, "while ensuring that x% of the harbour remains accessible to residents for recreation and active transportation, and while ensuring that business park lands do not encroach on any designated Greenbelt areas"

I am cautiously supportive of your 5.3.4 provision to potentially allow residential developments in business parks - especially if this would help create business parks that are more pleasing, walkable etc. However: I think it would be a real shame to have people living in ugly and un-walkable communities just because someone thought money could be made by sticking some housing in there. So I wonder if the plan needs to be a bit more forward thinking with respect to residential development in business parks: I propose that the plan should do more to encourage smart, walkable, aesthetically pleasing development in new HRM Business Parks right now, whether people are living there or not - and that way you have insurance if, at some point in the future, people do end up living there!!

5.3.5 - HALIFAX HARBOUR DESIGNATION

It would be nice to see something, in the section about industrial uses on the harbour, about provisions for public access and active transportation infrastructure on any new industrial sites.

I think it is such a shame that so much of the harbour in the north end and MSVU area is completely inaccessible - except for Africville (which is miles away from the heart of the North End), there is not even a small park where residents can go down and sit admire the view and enjoy the waterfront.

In addition, it is frustrating to see how the extensive shipyard and military developments in the north end seem (as far as I can tell) to mean no reasonable possibility for an active transportation corridor there. This is a real shame, because going along the water would be such a great way to travel by bike from south to north on the peninsula (and even beyond that, into Bedford!).

Therefore, would you consider putting in another bullet in the Halifax Harbour Designation section, that stipulates that whenever new industrial lands are created on the harbour, there should be an allowance for small public access points (e.g. little waterfront parkettes) and also the provision for an AT trail to run through the property?

REGIONAL CENTRE

I like the guiding principles for the regional centre. They are all excellent - thank you! Now please I ask you, once again, to carefully look at all the provisions in the plan, and honestly assess whether there are enough "teeth" in the plan as it stands right now to ensure that these principles can be implemented successfully. Thank you!

Finally, there are two important elements of the Plan that I think are missing.

I hope you will consider including both these items:

URBAN NATURALIZATION

I would dearly like to see something added to the plan to promote the creation of more naturalized spaces in areas of the regional centre where such features do not currently exist.

In the south end, residents have access to Point Pleasant park as a naturalized area where wildlife and native vegetation thrives. But residents in the north end (particularly the area between the Citadel and Yonge St) have no such an area. And although Point Pleasant is very wonderfully large, naturalized areas can also be small!!

I appreciate that we do have a few little parkettes scattered here and there with lawns and play structures - but it would also be wonderful to have little "nature parkettes" which would serve as wildlife habitat (especially for native songbirds and insects and wildflowers - and possibly amphibians?), and as a place for urban children to connect with nature (this has been shown, in recent research, to be very important for healthy development!), and for all residents to enjoy. (For example, when I'm taking care of kids it's nice to bring them to the playground.. but when I'm on my own I'd rather have a beautiful naturalized area in which to sit!)

I think that if we want to have a really environmentally sustainable city, and a really beautiful city, then we should work to **bring nature into the city**, as well as creating greenbelts of protected areas outside of the urban core.

NO MENTION OF IDEAL CITY SIZE (POPULATION)

In section 5.1.1, we say we want to build a regional centre that will encourage more people to move here. But how many more people? 50,000? 100,000? 500,000??

I am concerned that there is nothing in the draft plan about our collective vision for HRM, in terms of population size. One of the reasons I have chosen Halifax as my home is because it is a relatively small city, at 400,000. There are many attributes related to its size that I greatly appreciate, including, but not limited to:

- The relatively direct democracy (my councillor knows who I am and I can get an answer from her within two days if I need information; At a public consultation meeting, everyone can have an opportunity to speak);
- The "small-town-feel" (it is easy to get to know people and you always run into folks you know on the street);
- The walk/bike-ability (most places are very easy to get to via foot or bicycle, because it's a relatively small city - taking public transit is also quick and easy, most of the time);
- The outdoors and wilderness access - (because it is a small city it is quick to get out of it, either by bike, bus or in a car - unlike Toronto or Hamilton or Montreal where you feel trapped inside the City limits!)

For these reasons and others, I very much appreciate the fact that Halifax has a population of only 400,000. I have no desire or interest in living in a City of 600,000 plus ... I have done this before - and once a City reaches that size, one begins to lose all the elements outlined above.

Therefore, I was a bit concerned about the projections of Halifax growing to half-a-million. I feel uncomfortable about the way that this appears to be seen as a totally *passive* process. . .

Rather than allowing growth to passively happen, I am very interested in the idea of a City **engaging in a meaningful and purposeful conversation about *HOW MUCH we want to grow***. I would like our citizens to get together to discuss their ideal city size! What do we like about the size we are now? What will change if we grow bigger? What advantages and disadvantages will growth bring, and at what point (if any?) will Halifax lose its essence, if it grows too much?

Although rare, there *are* examples of communities who have had this sort of discussion and then put measures in place to limit growth to the size they collectively agree upon. There is an example north of Calgary I was told about once, but unfortunately I can't remember its name - however I did find this very interesting case study of a town in California:

http://www.howmany.org/stewardship_Petaluma.php

I would *really* like to see, in this version of the plan, at least one small paragraph about planning our target population size, rather than just helplessly fluttering our arms as the city grows (or shrinks!). Could we not put in a paragraph that states the need to have a discussion about this, and set the wheels in motion for considering this in 5 years' time at the next planning review?

Thanks very much for considering my views,

And thanks again to the planners and the committee for all their hard work!

Sincerely,

Katherine Kitching

Reference # 3.42

From: Martha R Leary

Sent: July 16, 2013 1:58:57 PM (UTC-04:00) Atlantic Time (Canada)

To: Regional Planning Office, HRM

Cc: Mosher, Linda; Adams, Stephen

Subject: RP+5 draft

Dear RP+5 staff and HRM Councillors,

I am writing to comment on the proposed Regional Plan (RP+5) document. I have grave concerns that RP+5 heavily favors the interests of developers, rather than representing the best interests of HRM residents, children and taxpayers. I strongly support the preservation of adequate urban wilderness areas and, in particular, the Williams Lake/Purcell's Cove Backlands.

Specifically:

1) Clause G-16 removes protection for our Urban Reserve lands. Deliberations with current hopeful developers on Urban Reserve lands in the Williams Lake Backlands have made it clear that this clause negates any protections provided by the zoning designation Urban Reserve. As you know, if this clause were to be consistently used throughout the HRM, there would be no 'reserve' at all. One by one, properties abutting developed lands would each fall into the category of exception as per Clause G16 until the term Urban Reserve became totally meaningless. **Clause G16 must be deleted.**

2) Council should act in the best interests HRM taxpayers, heed the advice provided in the commissioned report by Stantec Consulting, and incorporate those recommendations as an **accountable** target in the RP+5. **The development growth target of 50% urban, 25% suburban and 25% rural must be adopted to save the city \$3 billion over 18 years.**

3) A greenbelt is more than 'open space' - it is a concept that has definition and purpose. The RP+5 fails to define the concept and therefore makes the use of the term meaningless. The Williams Lake/Purcell's Cove Backlands should be designated as a part of the HRM Greenbelt and should be completely off-limits to development. **The concept of "greenbelting" should be clearly defined in RP+5 and specific areas of HRM should be identified and protected from development under this designation.**

Sincerely,

Martha R Leary

Reference # 3.43

July 17, 2013

to Mayor Mike Savage and Councilors cc: waye.mason@halifax.ca

Re: HRM Regional Municipal Planning Strategy Draft 2.0

I am a come-from-away, a professional who works part-time at St. Francis Xavier University and part-time consulting in microfinance and community development. I am also a published poet. I am also an investor locally and have used CEDIFS to support local businesses. I bike regularly and focus as much buying power as I can in my own neighbourhood. I used to be on the Halifax Community Investment Fund Board and try to be very active in my community and neighbourhood.

I choose to live in Halifax because I believe that it is the kind of city where I want to live, play and work. I want a city that has a dense, dynamic character where I want to walk through the streets for hours. Also, I want to live in a city that is genuinely committed to green space and wilderness protection and where I can access real green and adventure experiences within a short time from the city.

I am originally from Ontario and have lived for periods of time in Toronto, New York, Mozambique, Angola. I have also worked for long stretches in India, Germany and Switzerland. My knowledge of vibrant and dynamic cities stems from this wide knowledge of urban possibilities.

Increase growth areas in the urban area

I very much support Scenario B of the Stantec report that both supports HRM's growth goals but also emphasizes the cost savings and benefits of increasing growth in urban areas. Beyond the financial argument, urban density is what will make young professionals and families want to live in HRM.

There is definitely possibility for greater density in the downtown core. What makes a city a city – that is, what attracts people to visit, to move and study here, is it's urban core. Suburbs are suburbs anywhere. The character of a city is determined by the vibrancy of its core. When we think about the top cities in the world to live in- Berlin, New York, Vancouver, Cape Town, Seattle, Portland, Milan, Sao Paulo- suburban sprawl is not a feature of these cities.

We have a wonderful city but it is not nearly as dense as it could be. We need more urban planning that recognizes that downtown we need less parking spaces off of main roads (e.g. Staples) and thruways and more shops and living. These are principles that Jane Jacobs has written about extensively in various books. People want to walk in areas that are teeming with life and restaurants and shops (e.g. Argyle). I am one of the few residents that supports height and density. Not height for height's sake but well-planned height. There are many examples of cities that use height but not right off the main streets. Rather set back so that there is a human scale where people walk and access the street. I was surprised to hear that we are planning height off of main streets as part of the growth strategies. Too much height

gives the feeling of a financial district. It is not good for bringing people (i.e. customers) to an area or to make it feel livable.

Affordable Housing and Innovative Community-Driven Development

I applaud the principles of your plan for affordable housing and community development. I wish there were more concrete plans, goals and success measures in this regard. We need to be flexible about models of community development to support housing and infill. There are many examples in North America and around the world of community-driven development that allows community members and neighbours to invest in their own neighbourhoods- such as housing trusts (see examples in Vancouver, Calgary and across the U.S) and matching grants to neighbourhood associations (see the example of Seattle). There are many examples that combine market, near market and affordable housing that work both from a business model perspective and ensuring that communities have some investment in their community. More can be done to stimulate this kind of community ownership and responsibility for making HRM the kind of place that we want to live in. I am attaching an article that I wrote for the Coast recently on this type of community development.

GreenBelting and Wilderness Protection

I am Co-Chair of Woodens River Watershed Environmental Organization. It is important to me to be able to access green space within the city and quickly just outside of the city. I am supportive of the greenbelting notion but would have liked to see more concrete planning in place at this stage- at least principles and phasing. We sent a detailed letter from WREWO outlining a number of areas that we feel require more detail and greater attention including more details, even provisional, for greenbelting, the riparian borders expanded to 30m, natural wildlife corridors across major highways, inclusion of vernal pools and smaller wetlands. As our letter of June 18 states, protection of these green and wilderness areas is not clear because urban growth and development strategies have not been clearly, even provisionally, laid out.

Active Transportation

Your active transportation plan is equally disappointing. You mention active transportation (bike lanes, walkability etc), demand management (car share). However, your strategies all related to road construction and widening. In other words, how to make HRM car-friendlier. Again, I point to world-class cities and examples of urban development and active transportation. Bogota and closer- Montreal, are world-renowned for their bike paths, walkability and active transportation. None of the best examples worldwide build transportation primarily around cars. There are plenty of mechanisms to smooth traffic in downtown cars and encourage transit use, carpooling and cycling. As we know, there are health, social and environmental benefits. I expect this is an urban core.

Measures of Success

As a planner and a community development professional, the main area that I felt the HRM Plan is weak is the area of monitoring and measures of success. I would expect to see some phasing and provisional plans including clear benchmarks of success for the various areas of the plan. It is extremely vague in these elements leaving citizens and community members with very little opportunities for accountability. This the most disappointing aspect of the Plan. Why not use some of the 26 base-line measures that the Stantec report has provided. These are much more detailed and show relationships between factors such as use of active transport, time to leisure, recreation and green space, social interaction, safety, pollutant emissions, housing affordability, environmental conservation/management, social interaction and mobility with far more detail than the HRM plan. As an example of an excellent plan in terms of consultation, and collaboratively generated measures of success see the Ten Year Plan to End Homelessness in Calgary. It is more than just an affordable housing strategy and is available online.

As I said earlier, I choose to live in Halifax. I have had job offers to live and work in Europe. I could easily work anywhere in Canada as I am an independent consultant. My partner is from Halifax. I would very much like to make Halifax my home. I do believe that many of the underlying principles of the HRM Plan Draft 2 are there. Please have the vision, innovation and accountability to make HRM the kind of place that anyone would want to live, play, work and invest.

Best regards,

Original Signed

Nanci Lee

The Coast's article last week regarding mutual support (Two decades of world-class delusion, July 11) is spot on. Nova Scotia has a strong and vibrant history of mutual support based on study clubs, cooperatives and credit unions.

But here's the challenge: cooperatives have struggled. Small and localized has a hard time sustaining itself in a globalized world. Cooperativism alone isn't enough to run a business. And charity and subsidy have lousy track records.

So we throw up our hands and turn to big megaprojects and big business. All we have to do, we rationalize, is make enough profit to simply invest back in social or community. This is "trickle-

down,” an approach that has an even lousier track record worldwide than subsidy.

As usual, the truth lies somewhere in the middle.

Here are some practical examples from a recent conference at the Coady Institute and the Extension Department of St. Francis Xavier University, the source of the Antigonish Movement.

EcoTrust is a BC organization that has created a locally owned sustainable seafood company and a coastal licence bank owned by a group of BC hook-and-line groundfish companies. It is trying to duplicate that in the forestry sector, with five First Nations communities.

I met a woman from Tennessee who works in a small rural community foundation that uses a land trust model. The community-owned trust owns the land and leases lots for 99 years to people who then own the homes. There are community spaces and members are supported in permaculture or self-sustaining farming practices. The trust acts as developer keeping home ownership and rentals affordable for the long-term.

Push Buffalo is a network of neighbourhood agencies that have reclaimed vacant lots and created community centres and affordable housing that focuses on green and sustainable building and retrofitting. The process is driven by locally-owned financial ventures including but not limited to a cooperative.

What do these and similar examples tell us about mutual support models that work?

****Embedded in community.**** In all of the cases, community members and neighbours invested individually and collectively in these schemes both with sweat/passion and financial capital.

****Leverage externally.**** Importantly, the initiatives didn't stop at the community. They leveraged external support and financing to build on the community space. These supports were strategic and complementary, not drivers of the process.

Non-profit projects, set funding formulas and government-run programs often don't last---they don't have the local ownership to steward for the long run. Governments and program staff turn over, but neighbours invested in their communities don't.

****Tackle scale.**** Small is beautiful. It is a mistake, though, to take that maxim without understanding scale. We need different types of structures, small and large, some exclusive and some comprehensive.

In these cases, citizens played a central role. Scale was achieved through coalitions, a mix of

community members, businesses, government agencies and educational institutes. Smaller associations kept the right scale for connections and mutual support. Networks were able to be sustainable and keep policy in check.

This is new ground with no blueprint. It requires endless, frustrating hours of finding the ball, passing the ball, financing the ball, discussing what the ball is in the first place and what it is becoming. It means every two steps forward may mean one step back and two to the side. It means every group and every brilliant, creative and gutsy contributor will lose ground somewhere on something. Decades of difficult dialogue and deliberation by people who genuinely want to be around the table together.

It's messy and time-consuming. And is it worth it? Absolutely. It's what it's going to take to turn this ship around. Or at least point it into a more interesting sunset.

Here's the thing. These economic models succeed not because of money. It's because they've found the right place for money in a scheme that is based on the kind of ownership that comes from genuine and lasting connections. Broad-based change is about imagination and deliberation---not, it turns out, money.

Reference # 3.44

From: Emily LeGrand

Sent: July 19, 2013 10:59:49 AM (UTC-04:00) Atlantic Time (Canada)

To: Regional Planning Office, HRM; Corser, Susan; Tota, Kasia

Subject: RP+5 comments

Dear HRM Planners and Councilors,

I am writing to express concerns I have with the tentativeness still evident in the revised plan, which I believe will continue to lead to missed growth targets, which are essential to producing a livable HRM over the long term.

More specifically, I believe the clause G-16 has the ability to undermine the plan in more ways than just growth targets because it grandfathers in previous, often poor development decisions, which only expands the area of mistake and does not allow the plan to stand firmly looking toward its future commitments. It should be removed.

The plan needs to be far more specific about how it will achieve its aims. It is of no use to be a vague visioning document. It should be written so that it is easy for every councilor and planner to refer to on a daily or weekly basis as they make decisions, because every small decision adds up to a certain development outcome over time.

Also, the plan and the public open house gave little indication of analysis of why the initial growth targets were not met, or indeed why those 25%/50%/25% figures were even chosen. If council and HRM planning staff do not have a clear sense of which decisions they cumulatively made over the last seven years to miss the modest growth targets set out in the original plan, then there can be little hope of getting back on track, much less achieving the more stringent 50%/25%/25% targets which the Stantec report suggests are more meaningful and effective in terms of quality of life, environmental impact and financial logic.

The rivers, lakes and coastline in HRM are extremely special. Perhaps in no other Canadian metro area can one so easily bike to such a variety of bodies of water to recreate. These precious resources deserve to receive full protection according to current best management practices. The plan dances around committing to meaningful setbacks, but does not actually do it. Commit to 30 meter minimum development setbacks for all water courses. Moreover, maintain public access to water fronts. Without public access, it does not matter that these water features exist if only those who can afford to pay to live next to them (and deteriorate the water quality in the process).

The transportation chapter does not follow thorough with a clear commitment to sustainable transportation. If HRM is going to make any tangible progress toward reducing car travel, it must start

making clear, detailed and well-funded plans for developing an active transportation network. If the majority of the budget and detailed planning efforts continue to go toward roads, HRM will not achieve its livability, transportation, sustainability or greenbelting goals. Also, people have already demonstrated that they do not want Bayers Road widened, so why is it still in the plan. And it does not make sense to have a plan which supports AT and transit, and then reduce ferry service and propose building a third bridge. Ferries are for people walking, biking and busing. Bridges are mostly for cars. Surely running more ferry times has got to be less expensive than building a third bridge?

Please take the time needed to get this plan right.

Sincerely,

Emily LeGrand

Reference # 3.45

From: Johanna Lunn

Sent: July 18, 2013 4:30:08 PM (UTC-04:00) Atlantic Time (Canada)

To: Regional Planning Office, HRM

Subject: Changes must be made to Proposed RP+5

Dear Council Members,

I am writing to provide input for the proposed Regional Plan (RP+5) document.

I believe we have lost view in this city of what the *purpose* of city planning is, and *who* we are governing for. A city is made up of people. **If people are thriving, the city is thriving.** For each decision that is made we should ask "Will this advance the well being of the people or not?" I think if we genuinely do that, our Mayor, Councilors and government staff will indeed midwife a world class city. But instead, it seems, the city struggles to strike a balance between the a mistaken view of "economic development" and the imagined needs of the people, as if *the people* and *the economy* were two separate things. They are not.

A real estate developers end goal is to make money. There is nothing wrong with that. That is the aim of business. **But the specific self interested concerns of business alone should not hijack the planning process of a city** and I am deeply concerned that RP+5, by heavily favoring the interests of developers, has failed to consider the well being of the people.

One of the key ingredients of a livable city is the protection of the environment. We need to preserving our urban wilderness areas including the Purcell's Cove/Williams Lake Backlands and other areas like the outskirts of Cole Harbour, Tantallon or Lower Sackville. There are many examples of cities big and small, who have been able to do this including Toronto,ON; Portland, ME; and Freiburg, Germany. If they can do it, so can we.

I am specifically concerned about:

1) Clause G-16 is an overt loophole designed to be exploited by developers and removes protection for our Urban Reserve lands. **Clause G16 must be deleted.**

2) The Stantec Consulting report, provided to HRM Council, recommended **a growth target of 50% urban, 25% suburban and 25% rural**, in order to save the city \$3 billion over 18 years. Council should act in the best interests HRM taxpayers, heed this advice, and incorporate this as an **accountable** target in the RP+5. **The 25% urban, 50% suburban and 25% rural development target must be deleted.**

3) **The concept of "greenbelting" should be clearly defined in RP+5 and specific areas of HRM should be protected from development under this designation.** In particular, the Purcell's Cove/Williams Lake

Backlands should be a protected corridor, designated as a greenbelt area, that should be completely off-limits to development.

Going forward I encourage Council to approach planning as a process of discovery, rather than trying to steer the ship to previously determined outcome. It takes guts to have a genuine engagement process. To trust that there is real intelligence in the citizens who live, work and raise their families here. It could surprise us all.

Sincerely,

Johanna Lunn

Reference # 3.46

Dear Planners,

I am extremely concerned about the clause G-16 in the draft plan, this is a loophole that favours the developers and must be removed.

My special passion is the Purcell's Cove / William's Lake Backland which should be part of Halifax's green-belt.

I live next to the Boscobel development, I am totally stunned what developers are allowed to do, how they totally destroy a beautiful piece of land that was enjoyed and appreciated by so many people. How can they do this without having to consult the people that are impacted by this kind destruction.

William's Lake and the Backlands are a jewel within our City and many people come from far away to swim in the lake, skate in the winter and hike in the backland, a natural beauty so close to a major population area. Why would we allow the destruction of such a treasure?

I understand that there are enough serviced lots for the next 25 years. Why not force developers to concentrate on these before raping our virgin landscapes? Is it because those big machines cannot be used on smaller already serviced lots?

A deeply disturbed citizen

Original Signed

53 Albion Rd. Halifax, N.S.
B3P 1P8

Reference # 3.47

From: Rita MacAulay

Sent: July 15, 2013 6:50:31 PM (UTC-04:00) Atlantic Time (Canada)

To: Regional Planning Office, HRM

Cc: McCluskey, Gloria

Subject: RP+5 Review and food

Dear HRM Regional Planners and Councilor McCluskey

I am a resident of Dartmouth Centre constituency and am writing in response to the Regional Plan +5 consultation. For many years I have been working with others in the area of food, towards building community food security (when all community residents have access to enough healthy, safe foods through a sustainable food system that maximizes community self reliance, and social justice). I strongly value the important part it plays in the health, well being and vibrancy of individuals and communities.

Municipalities throughout Canada have been taking a more comprehensive view in addressing food and community food security issues. HRM has taken many positive steps, such as providing more support to community gardens. This Regional Plan +5 review provides us with an invaluable opportunity for HRM to recognize the importance of food and community food security.

I am hoping you will consider this addition,

Warm Regards,

Rita MacAulay

Reference # 3.48

From: Steve Machat

Sent: July 16, 2013 3:59:05 PM (UTC-04:00) Atlantic Time (Canada)

To: Regional Planning Office, HRM

Cc: McCluskey, Gloria

Subject: Hawthorne Street Designation

Dear Regional Planning Team,

I and many of my neighbours are concerned to find out that the new proposed Regional Plan designates Hawthorne Street as a Collector Street. We note that this is a change from the 2006 plan.

I strongly object to this new designation and request that it is removed from the plan.

As a community we have been trying to implement traffic calming measures for some time and I feel that this new designation will severely restrict any change that may be considered.

Recently Trucks have also been using our street as a cut through and the Collector designation changes truck use from 'large vehicles restricted' to 'some truck limitations'. This is clearly not acceptable on a street with many young children, an elementary school and several group homes.

Thank you in advance for your support on this matter. I would appreciate any updates that you may have through the regional plan consultation process.

Please note that I have copied our Councillor, Gloria McCluskey who is familiar with our concerns and who I understand also sits on the Community Design Advisory Committee.

Yours sincerely,

Steve Machat

Reference # 3.49

From: Sylvia Mangalam
Sent: July 18, 2013 9:18:59 AM (UTC-04:00) Atlantic Time (Canada)
To: Regional Planning Office, HRM
Cc: Outhit, Tim
Subject: Food and the Regional Plan

Dear Planning Office, and Mr. Outhit,

In the Regional Planning Process, I hope local food security gets the attention it deserves. Provision needs to be made for local spaces where food can be grown. This involves identifying best soil areas, and planning for their food use. Importing food, especially fresh foods, will become increasingly expensive. Access to such foods will decrease health care costs. New schools should be planned to have garden areas, and all schools should have gardening as part of the curriculum.

Fruit and nut trees should be used wherever possible for urban landscaping. There are beautiful blossoming pears, but they produce no fruit. This is a waste of potential food sources.

I would like to see provisions for urban goats and chickens. If New York City allows chickens, surely HRM can too. People have dogs and cats here, why not goats and chickens?

Yours truly

Sylvia Mangalam

PS. You are welcome to see our backyard anytime.

Reference # 3.50

From: Michaele Matthews

Sent: July 19, 2013 7:48:20 AM (UTC-04:00) Atlantic Time (Canada)

To: Regional Planning Office, HRM

Subject: voter and taxpayer's request

Dear Sir/Madam,

I am writing to provide input for the proposed Regional Plan (RP+5) document and, in particular, to raise my concerns that RP+5 heavily favors the interests of developers, rather than protecting the best interests of HRM taxpayers and preserving our urban wilderness areas (such as the Purcell's Cove/Williams Lake Backlands).

Specifically:

1) Clause G-16 is an overt loophole designed to be exploited by developers and removes protection for our Urban Reserve lands. **Clause G16 must be deleted.**

2) The Stantec Consulting report, provided to HRM Council, recommended **a growth target of 50% urban, 25% suburban and 25% rural**, in order to save the city \$3 billion over 18 years. Council should act in the best interests HRM taxpayers, heed this advice, and incorporate this as an **accountable** target in the RP+5. **The 25% urban, 50% suburban and 25% rural development target must be deleted.**

3) **The concept of "greenbelting" should be clearly defined in RP+5 and specific areas of HRM should be protected from development under this designation.** In particular, the Purcell's Cove/Williams Lake Backlands should be a protected corridor, designated as a greenbelt area, that should be completely off-limits to development.

Sincerely,

Michaele Matthews

Reference # 3.51

From: Liza Matthews

Sent: July 17, 2013 1:29:30 PM (UTC-04:00) Atlantic Time (Canada)

To: Regional Planning Office, HRM

Cc: Mason, Wayne

Subject: Williams Lake

Dear Sir/Madam,

I am writing to provide input for the proposed Regional Plan (RP+5) document and, in particular, to raise my concerns that RP+5 heavily favors the interests of developers, rather than protecting the best interests of HRM taxpayers and preserving our urban wilderness areas (such as the Purcell's Cove/Williams Lake Backlands).

Specifically:

1) Clause G-16 is an overt loophole designed to be exploited by developers and removes protection for our Urban Reserve lands. **Clause G16 must be deleted.**

2) The Stantec Consulting report, provided to HRM Council, recommended **a growth target of 50% urban, 25% suburban and 25% rural**, in order to save the city \$3 billion over 18 years. Council should act in the best interests HRM taxpayers, heed this advice, and incorporate this as an **accountable** target in the RP+5. **The 25% urban, 50% suburban and 25% rural development target must be deleted.**

3) **The concept of "greenbelting" should be clearly defined in RP+5 and specific areas of HRM should be protected from development under this designation.** In particular, the Purcell's Cove/Williams Lake Backlands should be a protected corridor, designated as a greenbelt area, that should be completely off-limits to development.

Sincerely,

Liza Matthews

Reference # 3.52

From: Elizabeth McCarthy
Sent: July 17, 2013 4:46:10 PM (UTC-04:00) Atlantic Time (Canada)
To: Regional Planning Office, HRM
Cc: Purcellscovearea1@gmail.com
Subject: Purcells Cove and Williams Lake Backlands

Re: Halifax Regional Plan

Dear Regional Planning Office:

As a resident of Fergusons Cove, I feel a strong need to express my concern over the direction HRM is taking regarding development in the greater Halifax area.

Yes, there is population growth in the Halifax area, but I question the need for the extent and randomness of development I am seeing in this area. I believe your plan should support greater growth in the urban area and less growth/ development in the suburban and rural areas (as mentioned in the original HRM By Design). Further, I understand that there are already sufficient areas approved for housing construction to satisfy the public need for at least the next thirty years.

Specifically, I believe that to allow development of the Williams Lake Backlands--which should be preserved as natural, undeveloped area -- would be a terrible error. If this land were developed, there would be no going back.

The ultimate error on the part of HRM and the Planning Office is the failure to recognize that we as human beings must not only consider ourselves, but we also must consider the other inhabitants of the land who share with us. If we fail to recognize this, we're "shooting ourselves in the foot", because Mother Nature does retaliate.

We need the open, natural land to allow for purification of air and water, and to allow species other than ourselves -- both animal and plant -- to continue to exist. If we don't make this allowance, the scales will (if they haven't already) tip against us. We also need this area to remind ourselves that we aren't the only ones on this earth.

I fear that the current Regional Plan does not support the values of most HRM citizens, but rather it supports the interests of developers

In the long-term, these lands should be protected and left natural.

Sincerely, Elizabeth McCarthy

Reference # 3.53

July 18, 2013

We have recently been made aware of the plans for development of the Bedford waterfront. It is quite disappointing that the scale of the development is such that it will impede the existing views of the Basin. For decades the Bedford Basin has been enjoyed and appreciated by everyone who travels the Bedford Highway. Now it seems it will only be for the enjoyment of the few who will be part of the development.

Also, it is very short sighted, on the city's part, to approve a development of this magnitude when the Bedford Highway capacity is already stretched to the limit. Another 5,000 to 6,000 people? How many more cars will that add to the overcrowded Highway? The cut through from the 102 down Larry Uteck is turning into another Bayview! When this new development is completed, along with the balance of the planned development off Larry Uteck, it will create a traffic nightmare such as Halifax has never experienced. Is this what you would refer to as 'good planning'?

We are very disappointed in those councillors and city staffers who worked to approve the proposed development.

Sincerely,

Ernestine MacDonald

Reference # 3.54

July 18, 2013

One of the major gaps in the RP+5 document is a tracking system whereby the concerned or interested citizen, even staff and elected officials, developers and others, can follow all the **Functional Plans** that were promised from the 2006 document. Some are more difficult, or impossible, to find than others and they all should be listed as in progress, abandoned or completed, with links where appropriate. If this document is intended to trigger 'next steps', then please make finding the next steps easy and logical. You have reworked many of the policy statements so they are difficult to locate or have been eliminated.

I use the **UFMP** as an example: Formerly E-20 under 2.4.1 has now become E-11 under 2.2.6 and I did not find a link to the large UFMP Functional Plan Document so that I might go to the document and become better informed about the details. There is no clue that trees form a basic part of our region and deserve protection and respect and that in the future, there will be guidelines/legislation/other to protect and enhance the tree canopy. In other words, the 2 sentence content re UFMP, p 27, is too soft, lacks any sense of importance and will be passed over by most reading this document.

In addition, I find the **Performance Measures Appendix** weak. I would like to see the benchmark figures. Again using the UFMP, where canopy cover ranges could be quoted for any one of the Neighbourhoods or the studied area as a whole....one could suggest raising the canopy cover by a percentage, or even state the number of trees to be planted in the next 5 years. Tree removal, a negative, is not what we want to see measured....make it a positive measurement. Adding to canopy will be something that citizens may even participate in with some incentives, opportunities or training and community engagement.

There has been a general lack of education of the public/citizens and others regarding many of the issues stated in the 2006 MPS document and 2.4.5 Emissions Reduction in particular. It affects us all. I use **Climate Change** as an example, E22 and vehicle idling. Nowhere have I seen any pretense to remind us about monitoring the reduction of idling, even in front of HRM/HRSB/HLibrary facilities or at layover bus stops or staff vehicles. Setting a positive example would encourage the corporate abusers to change their ways. Environment week has come and gone, perhaps another missed opportunity. (In the new version, E-22 is about floodplains).

Suggesting that a 2008 document (Climate Risk Management Strategy) (E-26) will provide guidance is a joke. This document needs timely revisions, data collection updates and research to be reestablished with new partners. Changes in technology, science, weather patterns and staffing skills surely suggest an upgrade to a 2008 doc. New risks are all around us.

The increase of invasive species, for example, suggests the need for an Ecologist or other skilled HRM staff person who can monitor, identify and interact with the many problems that are happening on both

public lands and private, a threat because of climate change, to HRM. I use Japanese Knotweed as a current problem, largely ignored (except in PPP), it is taking over.

If these documents are considered to be working documents, I look now to the section on **Open Spaces** and associated Map 3 - Trails, in both documents... is incomplete. The land based Trails, generally built by volunteers and others (developers) have not been completely documented. Signage and wayfinding are lacking; these park assets could be used to a greater degree if identified and promoted. Those that connect with Transit should be identified and promoted to encourage increased use. Building or construction standards have not been introduced in the past 5 years so new trail is not sustainable...this is a waste of limited resources, time and money. Proposed greenway corridors need resourcing - money, staff, standards, community engagement, partners, trained volunteers....a Tool Box for next steps. The number of kms of trail is a moving target....all trails need to be mapped, AT trail winter maintained, so as a performance measure, it is imperative to establish existing trail kms...this has not been done adequately, to my knowledge. This is complex as trail exists in parks, on other HRM public lands and rail corridors. Each District could be measured for a more accurate inventory.

Water trails have been overlooked...don't put them on the map if they are not to be resourced, access points identified, signed and maintained, etc. On the map, they look like a new resource; I was told an old file was uploaded (with no review or checks on continued or safe access points.).

Parks have been classified in a list from Neighbourhood to Regional Parks. HRM is fortunate to have many park assets. These have been ignored in many Districts and need to be adequately maintained to be safely and more positively used. As example, I list new District 12 where the Mainland Common has been ignored as an important asset, in spite of having a Masterplan, 2008. In addition, a neighbourhood park such as Turnmill/Langbrae has links to an adjacent school, ParkWest, but the connectivity is not safe (based on a visit 5 years ago by staff, elected officials and no change) to use as an AT route and has inadequate or no signage. So parks and green spaces need a map, hierarchy of maintenance and next steps, perhaps also done by District.

Included under this could be a review of the Assets that could be earmarked for Dogs Off Leash as it is recognized that there are inadequate resources for Dog Owners, an ever increasing number in HRM.

Map 13 and Blue Mountain Birch Cove Lakes Regional Park, after 6 years of discussion, visioning and community meetings, shows no change...this must be a mistake. Other maps have been presented to the public over a year ago (see link). Table 2-3, BMBCL Park should read NSE and DNR/HRM. A Watershed study was completed and is not mentioned; this suggests not suitable for development if the goal of safe water is to be maintained on downstream lakes. Lands outside the park are identified as Urban Reserve/Settlement, so not needed at this time. <http://www.halifax.ca/RealPropertyPlanning/bluemountainbirchcovelakes.html>

Transportation

4.2.2 / T2 Active Transportation Functional Plan, 2006, will be revised after a comprehensive public review earlier this year. There is no acknowledgement of the forthcoming revised report, taking new directions. Education and Enforcement of safe guidelines are important, such as bike helmets and use of a bell for all users is long overdue, if the report is to be successful. Likewise, Wayfinding and Signage must be included so public can find the proposed and existing AT routes.

There is no acknowledgement of a Walking Charter, signed by the previous Mayor, following the International Walk 21 Charter with its many goals/next steps. Walking is by far the largest AT activity and there seems to be little or no acknowledgement of a walkability scorecard or rubric for neighbourhoods or development, or retrofitting of spaces where walkability is impossible/unsafe/limited to only the very nimble (even bus stops have a problem in some places).

There is no mention of a project to replace the 20 year old temporary Lacewood Terminal. The public awaits next steps, based on the posting online, Feb 2011. **Lack of community engagement** on decisions such as this are troubling; no doubt there are other missed projects that have fallen aside due to lack of community engagement...ask the residents and users, don't wait for the elected officials. Zoning will need to change to allow construction away from a commercial zone, and a public hearing.

This chapter focuses on road widening. Its important that sustainable transportation alternatives are put in place first...the proposed route revisions, Transit Map, better signage and wayfinding to encourage increased transit use, revision of routes to serve a wider transit public, more bike lanes...off road, support for school AT (Walking School bus, bike racks, no parking at school yards, winter pathway maintenance, educate school administrators).

An HRM Share the Road Study needs to be acknowledged (currently under way).

Riparian Zones ...The buffer should be 30m.

Discretionary Approvals

This is a new chapter, vague and confusing. It must be established, in the first instance, the amount of available serviced land for development. It seems to me that there has been a recent rush to approve lands for development (Beaverbank) that will distort the current figures of the urban/suburban/rural mix. How are these counted...from what date are we to start counting....is it fully serviced lots, lots approved, lots sold, etc? How can one assess the progress of this MPS if the baseline numbers are so vague?

Policy G16 needs to be removed as it is very vague and misleading. As there is serviced land available elsewhere in HRM, there is no need to '*designate and zone for development*' abutting lands until growth

suggests the need, well after the life of this Plan. The costs to develop these lands will have to be born by any potential land owners.

A paragraph needs to be reworked to reflect current knowledge and understanding of available serviced land. In addition, brownfields such as closed strip malls, car dealerships, etc, should be considered in the first instance for redevelopment...a new opportunity to create more density. This is happening in other cities...the urban planning scene is changing, are we keeping up with a new approach to create access to a new way of life, without a car? Including access to 'Car Share' should be a plan for all new Condos, the parking spaces for new construction ...condos, etc, need to be reworked.

Housing is briefly discussed. There is a wide gap in some areas and more effort needs to be made to close this gap for the economically challenged.. Integration of accessible, lower cost housing is needed and I may have missed any attempt of this. By the same token, making land available for sustainable **community gardens** is absent. Each district needs a garden and should be a factor in any planning going forward. HRM land could be better used for such as this.

Planning of **Centres** seems to have disappeared although some great charts are included. 5 years ago and again, we thought there was a plan in mind for growth areas. Then I believe the HRM office was closed that might have helped... so how can any expectations be met to discuss growth targets and plan for the future without supportive and knowledgeable staff.

Glossary of terms used:

Many terms are unfamiliar to the public and others for a shared understanding of the document when it come sto implementation. Some things are vague, perhaps this is the intent!

I use the term Greenway as an example, used in the 2.2.2 title but I could not find it elsewhere as a function of any Parks or trails. This 2.2.2 section needs to be reworked, introducing the concept of Active Transportation corridors as both a function of sustainable transportation and active recreation. As a volunteer involved in this important aspect of the active Halifax community, I am disappointed that there is not even a simple statement that suggest that the 'development and maintenance of trails by a community of volunteers' (or similar) working alongside developers and others to insure trails are a part of any new community. This is where the term Greenway could be introduced. I think its a term that may survive this MPS but needs a common understanding...a conservation corridor, with no cutting (not as per NS Power who cut trees every year along a local trail, called a greenway by some). Table 2.2 could have the category of Greenway as the type and Function could then be elaborated.

My comments may go beyond the intent of the MPS, however it is my understanding that the Policies adopted will lead to further discussion and steps that will help translate into positive actions. I look forward to these positive actions.

Thanks for the opportunity to give feedback.

Wendy McDonald

District 12 resident

Reference # 3.55

July 18, 2013

I have followed with some concern the drafts for the subject plan. I find myself agreeing to the reasoned arguments put forward by the Our HRM Alliance on several of the components of the plan as it stands. In particular:

Clause G-16 provides too much leeway to developers to exploit Urban Reserve lands at the expense of maintaining these lands in a natural state as (among other things) an ecological buffer and filter zone. The clause should be deleted.

While the recent FAQ addresses the issue of growth targets I still feel that the arguments supporting a growth target of 50% urban, 25% suburban and 25% rural far outweigh the concerns staff have raised. It is never easy but the targets should be pursued with vigour to reduce suburban sprawl and our dangerous over-dependence on individual petroleum based transportation. Therefore the proposed split of 25% urban, 50% Suburban and 25% rural should be deleted.

The concept of "Green belting" should be more clearly defined and then used to protect areas from development and channel development into clearly defined and researched growth centres. The promotion of a system of greenbelt areas that are interconnected and fully support the natural cleansing effect of contiguous undeveloped (or minimally developed) forested and vegetation areas will reduce our infrastructure costs in the long term and provide an environment that humans can enjoy in harmony with the rest of the natural world.

Michael McFadden

Reference # 3.56

Sent: July 18, 2013 3:11:13 PM (UTC-04:00) Atlantic Time (Canada)

To: Regional Planning Office, HRM; purcellscovearea1@gmail.com

Subject: Concerns Regarding HRM Regional Plan (RP+5)

Dear Council Members

I am writing as a long term resident of Halifax. Since 1986 my family, neighbors and friends throughout HRM, and now my grandchildren have enjoyed the undeveloped beauty of Williams Lake, the Backlands and Colpitt Lake. Five years ago I moved to Purcells Cove Road to be nearer these lakes and woodlands.

I have grave concerns about several obvious flaws in the current HRM RP+5 and have attended many of the community meetings where these concerns were expressed.

1. Specifically, Stantec Consulting's recommendation of growth targets of 50% urban/25% suburban/25% rural should be adhered to. Excessive emphasis on suburban sprawl works to no one's benefit but the developers. Moreover, it would cost the city's taxpayers \$3 billion over 18 years, not to mention the irreplaceable loss of unspoiled land.

2. Please delete clause G-16. Existing guidelines should be adhered to. This clause allowing for re-designation does not fool anybody.

3. Many of the most livable cities in North America have been farsighted to protect green space in the city limits. New York, Denver, Boulder Colorado, San Francisco are but few of these. The current HRM RP+5 mentions **greenbelting, but this should be clearly defined, with specific areas identified as protected from development under the greenbelt designation. In particular the Purcell's Cove/Williams Lake Backlands should be protected as a greenbelt area.**

The Council has the opportunity to act in the best interests of current and future generations of Halifax residents and taxpayers, and preventing the indiscriminate suburban sprawl that will be the inevitable outcome if decisive action is not taken now.

Thank you very much for your attention in this matter, and for all you do on our behalf.

Sincerely,

William McKeever

Reference # 3.57

From: Ian McKenzie

Sent: July 17, 2013 9:49:45 PM (UTC-04:00) Atlantic Time (Canada)

To: Corser, Susan; Tota, Kasia; Regional Planning Office, HRM; Mayor

Cc: Outhit, Tim; kelly@kellyregan.ca

Subject: I oppose the Bedford waterfront Infill

Although I call Nova Scotia "home", I lived in Toronto for 23 years. In that time I watched as Toronto's waterfront was slowly cut off from the rest of the city by a wall of condominiums. Is that really "progress"? I think not. I do not want to see the same thing happen here, in Bedford. Instead of allowing developers to choke the waterfront with 39 new buildings and choke Bedford Highway with up to 6400 more commuters, please focus on efficient, frequent public transit. The rail lines are there already! Put some commuter trains on them! The beautiful Bedford Basin is right there. Why aren't there any ferries from Bedford to Halifax? The solutions seem obvious.

Ian McKenzie

-Begin Attachment-

Dear Mayor & Community Development advisory Council,

I am writing to provide input for the proposed Regional Plan (RP+5) document and in particular to let you know that Save Bedford's Waterfront society is very concerned that RP+5 heavily favors the interests of the developers, rather than protecting the best interests of HRM taxpayers & preservation of our urban wilderness areas, coastal waterways and harbour areas. As a member of the larger "Our HRM Alliance" group, the "Save Bedford's Waterfront Society" shares concerns expressed by our allies that the revised HRM Regional Plan does not adequately tackle crucial issues such as sprawl, affordable housing, transportation & green-belting, preservation of the environment & proper water buffer zones.

The MP-5 offers a few encouraging commitments towards keep Nova Scotia's coastal areas & freshwater ecosystems healthy and productive. These include the proposed water supply protection zone, and stricter restrictions around clearing vegetation around watercourses in riparian buffer zones. However, despite this, RP+5 proposes changes that will further weaken existing water and coastal policies and by-laws and have grave consequences on water quality.

*While we support a renewed commitment to riparian buffer zones around all water bodies (**Section 2.3.3, Policy E-16**) we still feel strongly that a 30 metre buffer zone should be considered around all fresh water bodies, and wider setbacks of 60 to 100 metres for exposed or eroding coastal areas. We also support restrictions on vegetation removal from riparian buffer zones (**Section 2.3.3 Policy E-16**).*

Save Bedford's Waterfront is very concerned with the following as it directly affects our community, environment and our waterfront:

*Halifax Harbour (Section 2.3.3, Policy E-17). **Within the current plan, Halifax Harbour is exempt from watercourse buffer requirements/ Halifax Harbour is a large, complex, and diverse part of HRM.** How can this be? Within the current Harbour Zone are residential, commercial or natural areas that non-industrial and do not host marine dependent activities. This includes, but is not limited to, areas such as **Bedford Waterfront**, North West Arm, Mill Cove, Cow Bay and Eastern Passage, the former DND lands. **Watercourse buffers and setbacks should be required in these areas just as they are around other HRM watercourses!***

For those of you that may still be under the assumption that there is no natural pre-existing shoreline left on the Western Shore of Bedford basin, that assumption is wrong. There is and it needs protection.

*Development Agreements and as-of-right development (Section 2.3.3 E-18). Under RP5, Riparian agreements. **buffers are not required for as-of-right development, and need only be considered for development***

*We believe riparian buffers should be required **for all developments** adjacent to a watercourse.*

*Grandfathering riparian buffer requirements (**Section 2.3.3, Policy E-19**). The proposed changes to RP-5 calls for relaxing riparian by-law requirements on lots in existence before this plan came into effect in 2006. Save Bedford Waterfront Society thinks there should be absolutely no relaxation of buffer requirements, particularly on lots that are not suitable for development such on floodplains, or low lying coastal areas!*

Many aspects of the plan need more consideration and certainly more community input:

a) Growth strategy

b) Greenbelting

c) Transportation

d) Community engagement

e) Water buffer zones

We believe that these sections of the Plan cannot be dealt with internally by the Halifax Regional Municipality (HRM) administration. They are to do with the very nature of HRM and how it reflects community values, not technical issues. It is not reasonable to wait for the public hearing, and expect informed community discussion and creative debate to inform council's decision in the fall.

Clause G-16 is an overt loophole designed to be exploited by developers and removes protection for our Urban Reserve lands. **Clause G16 must be deleted.**

*The Stantec Consulting report, provided to HRM Council, recommended **a growth target of 50% urban, 25% suburban and 25% rural**, in order to save the city \$3 billion over 18 years. Council should act in the*

*best interests HRM taxpayers, heed this advice, and incorporate this as an **accountable** target in the RP+5. **The 25% urban, 50% suburban and 25% rural development target must be deleted.***

The concept of "greenbelting" should be clearly defined in RP+5 and specific areas of HRM should be protected from development under this designation.

Please let it be documented that we are very dissatisfied with the proposed Regional plan as it stands now, and are opposed to it. Please listen to the people and community groups in your city and make the positive changes. We have copied our councilor & our MLA on this as well.

Best,

*Sandra Banfield
VP -Save Bedford's Waterfront Society*

-End attachment-

Reference # 3.58

From: wendy mclellan

Sent: July 16, 2013 7:50:44 PM (UTC-04:00) Atlantic Time (Canada)

To: Regional Planning Office, HRM

Subject: regarding new plan

hi there!

just letting you know that i do not support more urban development on the eastern shore.i have lived on this shore all my life 62 years ,because i like rural life.if i wanted to live in a town or city ,i would move there as others can do also.i do not want to see a new big highway on this shore.it is so sad to see a government in this province that does not have the guts to tell the big contractors in the city that your not welcome on the shore,we dont want development.we want our hunting and fishing ,we dont want this ruined.this is our way of life here.

its time our politicians told everyone that canada is not going to become another third world country just to feed over populated countries and that canadians come first.using any kind of pesticides or chemicals in our oceans has to stop.aquaculture on our rivers and lakes also should never happen .we must protect what we have.

it is time for better government in this province who will help re educate developers and their workers ,instead of over populating this province.according to our 2011 census the population of ns was 921,727 and nb 751,171.ns is only about half the size of nb.we know there is no more space to build on in halifax ,but does that give you the right to destroy our way of life on the shore also?

look at the big picture,halifax is so over populated now you are having huge traffic problems,yet you want to bring more people in here to help make things worse why,or is it all because of the votes.

i have looked at the transportation proposals and was shocked to see that all our money will be spent in the city,none on our secondary roads on the shore.our roads are deplorable ,yet you can build new subdivisions for immigrants.what about the people who helped build this province ,dont we deserve better roads before newcomers.

so yes your plan really sucks for me ,and if it should go through i wont be voting municipaly or provincially

wendy mclellan

Reference # 3.59

From: Cyncie Moore

Sent: July 17, 2013 8:52:13 AM (UTC-04:00) Atlantic Time (Canada)

To: Regional Planning Office, HRM

Cc: purcellscovearea1@gmail.com

Subject: Purcell'sCove/Williams Lake backlands

Dear Sir/Madam,

I am writing to provide input for the proposed Regional Plan (RP+5) document and, in particular, to raise my concerns that RP+5 heavily favors the interests of developers, rather than protecting the best interests of HRM taxpayers and preserving our urban wilderness areas (such as the Purcell's Cove/Williams Lake Backlands).

I live in Dartmouth, near Lake Banook, I use Shubenacadie Park extensively (which definitely has decreased in its natural attributes due to traffic noise from Highway 118) , but I prefer to swim and skate and hike in the Purcell's Cove, Williams Lake backlands. There are many reasons why this land in particular should be protected. Lake Banook for example has development for 3/4 of the way around it. The swimming is not clean or fresh there. The feeling is one of urban congestion. William's Lake is a resource for the whole city,not to mention for people from abroad who have found their way to such a nice spot. Over the years more and more people have discovered Williams lake, I now see people there who I met there 20 years ago, bringing their grandchildren to have the same wonderful experience. It is an incredibly beautiful and relatively pristine landscape, right in the middle of an area that is gradually being developed. Please protect these lands.

I feel that Halifax will lose something precious and unique if William's lake sees development. The damage done there by development could never be repaired, the wilderness feeling in the city could never be recreated. Please protect these lands and add them to the city Greenbelt area. Please do not give in to the developers every step of the way. Perhaps send the developers over to Dartmouth to develop some nice condo projects in downtown Dartmouth, it needs it and it looks like there is plenty of scope over here, that would also be good for increasing the use of public transit and stimulating the downtown. But leave the people of HRM this wonderful pristine wilderness of Williams Lake.

Specifically:

1) Clause G-16 is an overt loophole designed to be exploited by developers and removes protection for our Urban Reserve lands. **Clause G16 must be deleted.**

2) The Stantec Consulting report, provided to HRM Council, recommended **a growth target of 50% urban, 25% suburban and 25% rural**, in order to save the city \$3 billion over 18 years. Council should act in the best interests HRM taxpayers, heed this advice, and incorporate this as an **accountable** target in the RP+5. **The 25% urban, 50% suburban and 25% rural development target must be deleted.**

3) **The concept of "greenbelting" should be clearly defined in RP+5 and specific areas of HRM should be protected from development under this designation.** In particular, the Purcell's Cove/Williams Lake Backlands should be a protected corridor, designated as a greenbelt area, that should be completely off-limits to development.

Sincerely,

Cynthia Moore

Reference # 3.60

From: Jennifer Nowoselski

Sent: July-11-13 7:40 PM

To: Watts, Jennifer

Subject: Regional Plan Suggestion

Hi Jennifer,

I'm writing you to as a citizen of the HRM in regards to the Regional Plan. I believe that the plan should include a section on food sovereignty. The concept of food sovereignty suggests that individuals should have a voice in land use and have the opportunity to create and obtain foodstuffs without dependence on the global market. This section could include plans to support local production, distribution and public accessibility.

Implementing policy to create a culture around food sovereignty would allow our community to produce and distribute foodstuffs in an environmentally sustainable and socially just way. The HRM has already taken steps to build local, sustainable food systems through the support of community gardens on municipal land. The Regional Plan provides an opportunity to strengthen support for community-based initiatives around food sovereignty at a regional level.

Please feel free to contact me with any questions or information regarding an updated draft including initiatives towards food sovereignty in our region.

Cheers,

Jennifer

Reference # 3.61

From: Orr, Katie
Sent: July 11, 2013 2:36:37 PM (UTC-04:00) Atlantic Time (Canada)
To: Regional Planning Office, HRM; McCluskey, Gloria
Subject: Hawthorne Street - keep our street local

Dear Regional Planning Team,

I object to the proposed change to the Regional Plan to designate Hawthorne Street as a Collector Street and ask that this be removed from the plan.

Hawthorne Street has a elementary school and playground, several neighbourhood day care centres, and many children and youths walking and biking to adjacent parks, Lake Banook paddling clubs, and recreation centres. As it is now, trucks and cars often pass by faster than the posted speed limit, and I think it is time for traffic calming measures, rather than the proposed change which would bring even more cars and trucks to the street.

Recently Trucks have also been using our street as a cut through and the Collector designation changes truck use from 'large vehicles restricted' to 'some truck limitations'. This is clearly not acceptable on a street with many young children, an elementary school and several group homes.

Thank you in advance for your support on this matter. I would appreciate any updates that you may have through the regional plan consultation process.

Please note that I have copied our Councillor, Gloria McCluskey who is familiar with our concerns and who I understand also sits on the Community Design Advisory Committee.

Yours sincerely,

Katie Orr
Hawthorne Street Resident

Reference # 3.62

July 16, 2013

To Whom It May Concern:

I feel compelled to write and provide my input for the proposed Regional Plan (RP+5). In particular, to voice my concerns that RP+5 is heavily weighted for the interests of developers, with very little regard in protecting the best interests of HRM taxpayers and preserving our beautiful urban wilderness areas (such as the Purcell's Cove/Williams Lake Backlands).

I have particular concerns regarding the following points:

1) Clause G-16 is a clearly ``hidden`` loophole designed to be exploited by developers and removes any protection for our Urban Reserve lands. **It is imperative that Clause G16 be deleted.**

2) The Stantec Consulting report, which HRM Council has been given, recommended **a growth target of 50% urban, 25% suburban and 25% rural**, in an effort to save the city \$3 billion over 18 years. I am requesting that council act in the best interests of HRM taxpayers, follow the recommendation of the Stantec report and incorporate this as an **accountable** target in the RP+5. **The 25% urban, 50% suburban and 25% rural development target must be deleted.**

3) **The concept of "green belting" should be given more than lip service. It needs to be clearly defined in RP+5 and specific areas of HRM should be protected from development under this designation.**

The Purcell's Cove/Williams Lake Backlands should be a protected corridor, designated as a greenbelt area, and should be completely off-limits to development to permit the enjoyment of this beautiful area by all HRM residents.

Trusting you will consider the concerns of the majority of residents of the Purcell's Cove area and HRM and take the above recommendations into consideration with regards to this very important topic!

Yours truly,

Jennifer Oxner-Fifield

Resident and Property Owner

Reference # 3.63

From: Brian Palmer

Sent: July 11, 2013 2:40:58 PM (UTC-04:00) Atlantic Time (Canada)

To: Regional Planning Office, HRM

Subject: PROPOSED AMENDMENT HRM 5 YEAR PLAN - ENCOURAGING HIGHER ENVIRONMENTAL STANDARDS FOR BUILDING CONSTRUCTION

Dear Sir or Madam,

I am submitting a proposed amendment to the HRM 5 Year Plan.

The current plan and many of the amendments already proposed will increasingly provide positive enhancement to the environment in the Halifax Regional Municipality in the coming decades. These activities, however, focus largely on the outside environment, e.g. green spaces, protection of water sources, transportation, etc. These are all very good initiatives, but I am not aware of any proposals that would reduce energy and water consumption and create healthier environment within our buildings themselves.

The Canada and Nova Scotia Building Codes set mandatory standards for the construction of buildings. While standards for enhanced efficiency, et cetera in buildings are and are likely to be increasingly incorporated in these Codes, these standards establish only “minimum” requirements and therefore only minimally advance reductions in energy and water consumption in buildings. We can and should do better than just the bare minimum, and if we do the citizens of our municipality will benefit from an enhanced environment and reduced requirements for providing municipal services.

There are currently a number of voluntary standards available in Canada that would significantly enhance the efficiency of buildings and greatly reduce the environmental impact involved in their construction and operation. Examples of these enhanced standards include:

a. Leadership in Energy and Environmental Design (LEED)

(<http://www.cagbc.org/Content/NavigationMenu/Programs/LEED/default.htm>) is a “certification program and an internationally accepted benchmark for the design, construction and operation of high performance green buildings.” “LEED promotes a holistic approach to sustainability by recognizing performance in five key areas of human and environmental health, which include sustainable site development, water efficiency, energy efficiency, materials selection, [and] indoor environmental quality”; and

b. the Living Building Challenge

(<http://www.cagbc.org/Content/NavigationMenu/Programs/LivingBuildingChallenge/default.htm>) is a “philosophy, advocacy tool, and certification program that addresses development at all scales. It is comprised of seven performance areas: Site, Water, Energy, Health, Materials, Equity, and

Beauty. These are subdivided into a total of twenty Imperatives, each of which focuses on a specific sphere of influence. The purpose of the Living Building Challenge is straightforward – it defines the most advanced measure of sustainability in the built environment possible today and acts to diminish the gap between current limits and ideal solutions. Whether your project is a single building, a park, a college campus or even a complete neighborhood [sic] community, Living Building Challenge provides a framework for design, construction and the symbiotic relationship between people and all aspects of the built environment.”

I appreciate that it may not be within the authority of HRM to impose standards for the construction of buildings; however, I believe that the municipality does have options for encouraging developers and builders to adopt standards that are higher than those in the Building Codes. I therefore propose that an amendment be made to the HRM 5 Year Plan in Chapter 2: Environment, Energy and Climate Change to include “HRM shall seek to advance the energy efficiency of buildings and reduce greenhouse gas emissions by promoting construction standards that are more environmentally sustainable.”

Sincerely,

Brian Palmer

Reference # 3.64



5257 Morris Street
Halifax, NS, B3H 4R2
Info@pdcentre.ca
902.494.8494

To Mayor and Community Design Advisory Committee (CDAC)

After careful review of the current draft Regional Plan (RP+5) many residents and organizations within HRM agree that the Plan is not bold enough. A poll recently conducted by Corporate Research Associates shows that 76% of HRM residents support meeting the growth targets; however, the Plan does not address the failures of the 2006 Regional Plan to meet similar targets. It is also at odds with the HRM By Design Downtown Plan in terms of supporting growth in the Regional Centre. A recent study by Stantec reports that if HRM stuck to its growth targets it could save up to \$670 million over the next 20 years. The Regional Plan review is the perfect opportunity to identify how public investments, public transit, development incentives and other strategies can be aligned to strategically attract development in the Regional Centre and reduce the costs of future development.

Five aspects of the Plan need more consideration and certainly more community input: (a) growth strategy (b) environment (c) greenbelting (d) transportation and (e) community engagement. These sections of the Plan should not only be dealt with internally by the Halifax Regional Municipality (HRM) administration. They are not merely technical issues but go to the very nature of HRM and how it reflects community values. It is not reasonable to wait for the public hearing, and expect informed community discussion and creative debate to inform council's decision in the fall. We need to think creatively as a community about what a bolder direction for HRM might look like.

Within the Plan the concept of "greenbelting" is vague and confused. As presented, it is ineffective in establishing firm growth boundaries and protecting important green corridors or parks such as the Blue Mountain Birch Cove Lakes. Further, the Plan provides little certainty or commitment to improving our environment by protecting riparian zones around lakes and river areas as well as the Bedford Basin.

The transportation chapter provides very little in the way of tangible commitments or investments that would ensure active transportation and public transit viable are options for moving around the city. At its root, the strategy is firmly grounded in a "more roads for more cars" philosophy. Instead we should look at how transportation investments could serve as catalysts for attracting development in key areas, while reducing congestion and the need for future highway investments and the exorbitant cost of an additional bridge crossing. The attitude of the Plan is inconsistent with the clear, well-developed ideas and values shared by a broad cross-section of this community. Nor is it in line with what is happening around the world.

Community engagement as broadly prescribed (in Chapter 9) and practiced in the preparation of the RP+5 limits the ability to understand values and long-term direction desired by the public. To open small windows for controlled public and selected "stakeholder" reaction fuels community apathy and excludes citizens from the real debates. Instead of moving us forward together, this approach discounts our ideas, our imagination and our passion for the city. This community and HRM council deserve to see a Plan that would move us forward, building a future that is more ambitious and inspiring, healthy, sustainable, vibrant and affordable.



5257 Morris Street
Halifax, NS, B3H 4R2
Info@pdcentre.ca
902.494.8494

The Planning & Design Centre, in conjunction with a number of community groups, associations and individuals, is committed to developing an open community-based Regional Plan and would be delighted to work on this collaboratively with HRM Staff.

This group includes:

- Ecology Action Centre
- Downtown Halifax Business Commission
- Spring Garden Area Business Association
- North End Business Association
- Quinpool Road Business Association
- Halifax Cycling Coalition
- Heart and Stroke Foundation
- Friends of Halifax Common
- Halifax Community Health Board
- I Heart Bikes
- Bicycle Nova Scotia
- Dalhousie Office of Sustainability
- Sackville Rivers Association
- Cities & Environment Unit
- Save Bedford Waterfront Society
- Oathill Lake Conservation Society
- Bernard Smith
- Patricia Manuel

We will organize several interactive and open community sessions over the next month; to meet, display work, discuss, debate and develop ideas in an inclusive, informed, and highly visible manner. These sessions will collaboratively develop a Plan for council's consideration, one that will raise expectations and articulate how we will grow, establish boundaries, protect the environment, facilitate improved transportation and enhance the sustainability of the region through clear public commitments.

Upcoming Community Sessions will be promoted on the PDC website Pdcentre.ca

1. July 29 Keshen Goodman Library, 330 Lacewood Drive, 6:00 - 8:30
2. Week of August 6, Location and Time To be Announced

Thank you

Ross Soward
Director of Operations
Planning & Design Centre

Reference # 3.65



July 19, 2013

Community Design Advisory Committee
c/o City Hall
1841 Argyle Street
PO Box 1749
Halifax, NS B3J 3A5

Re: Regional Plan Five-Year Review, Chapter 4 – Transportation

Dear CDAC:

Thank you for your tireless work on the RP+5. We have noted some positive changes with this draft and want to commend you for those additions:

We are happy to see the addition of objectives, as a good plan should always have objectives. In particular, objective 1 speaks to integration – a key component of *It's More Than Buses'* Essential Elements of High Quality Public Transit. An integrated system gives residents more flexibility in accommodating their diverse needs and interests as well as makes the system more useful. Transportation demand management has also been introduced, which is a *good start*. Lastly, we appreciate that you have recognized the need to focus resources in urban areas.

Introduction

We recognize that this committee has some familiarity with *It's More Than Buses* (IMTB), having received feedback and an IMTB information package for your October 3, 2012 meeting on "mobility". This would have included our Pocket Guide, outlining the fore-mentioned "Essential Elements of High-Quality Public Transit" – our recommendations for HRM. IMTB continues to further this vision, knowing that if substantial changes are made to the system to make high density corridors fast, frequent, reliable, and user-friendly, even with current resources, the system will become a better competitor to the private vehicle and ridership will increase. Increased ridership takes cars off the road, decreasing traffic and degradation to our road systems, it puts more money in the pockets of HRM residents and the city itself, and is more environmentally sustainable – isn't this what we want for HRM?

While *It's More Than Buses* (IMTB) began as a series of public engagement sessions held in 2011, we are continuing our work to improve access, mobility, and create a better city. As such, we would be remiss in not responding during this phase of the RP+5, as there is more work that needs to be done on this draft.

Encouraging Changes

Again, we are happy to see some changes in the RP+5 draft. Objectives have been added, where previously there were none. Objective 1 speaks to integration – a key component of IMTB’s essential elements of high quality public transit. Transportation demand management has also been introduced. And lastly, focusing on urban areas will help better allocate transit resources. While these have some promise, there are changes that still need to be made before the draft is finalized.

The objectives are not integrated *into* the plan, which they should be. Along with integrated objectives the plan should also outline measurable targets for ridership (and a corresponding decrease in automobile use), and concrete steps to achieve the targets.

We have also recognized that creating an urban service boundary and concentrating resources in that area is a step in the right direction (map 7A); however the proposed transit service boundary is hardly a boundary at all. It encompasses most, if not all, of Metro Transit’s current services and there is no clear commitment to improve the level of service within the boundary. When you talk about urban transit, you should consider the area defined in the *Centre Plan*. Concentrating resources in that area will allow Metro Transit to provide more frequent service, and thus better reliability, for current riders and those who would use the bus if service were better; thus increasing ridership. We would also point out that there are no commitments to support the development of community transit services or connect them to the regional transit network, the proposed service boundary risks cutting off rural communities from the transit system rather than integrating them. While we fully support the goal of focusing investment in transit in urban areas (to achieve high levels of service as the foundation for a strong regional network) this transit service boundary is not necessarily the best tool.

Recommendations:

Better integration of transportation objectives into the rest of the Regional Plan, measurable targets, and concrete steps to achieve targets.

Decrease the size of the urban transit service boundary (map 7A) to the *Centre Plan area*

Establish bold targets for transit, such as minimum services standards and modal share targets, for densely populated urban areas.

Make a clear commitment to connect rural community transit systems to the regional transit network.

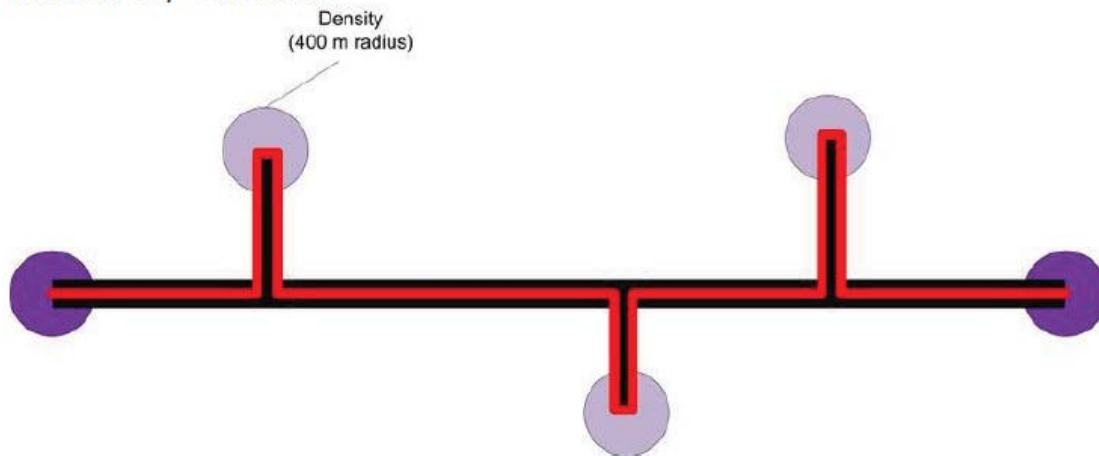
Creating Transit Friendly Communities

There is a lack of policy to create communities that are transit friendly. Although Policy T-9 encourages transit-oriented development, there should be supporting policies that define what makes a community transit friendly, in terms of density, walkability, a mix of uses and direct street connections. Direct street connections – both within and between communities – are critical to providing efficient transit routes. International transit expert Jarrett Walker, who spoke at IMTB’s first session, describes the “Be on the Way” principle, a simple but powerful idea. Efficient transit routes operate in straight lines, not in curvy, indirect routes. Important destinations should be on that straight line – they should Be on the Way! (<http://www.humantransit.org/2009/04/be-on-the-way.html>)

Be on the Way – Good Service:



Not on the Way – Poor Service:



The existing Regional Plan did a very good job of directing growth into new suburban centres. The physical form of those centres – twisty, poorly connected streets and too many cul-de-sacs – break the simple rule for transit-friendly communities: Be on the Way. Transit routes in these developments don't have long, direct collectors or arterial streets to follow and often have to slowly wind their way through neighbourhoods. Potential riders also have to walk long distances to any transit service because of poor street connectivity. Examples of this type of development are Clayton Park West near Highway 102 and Washmill Boulevard, and many of the new subdivisions in Bedford – Paper Mill Lake, Millview, Larry Uteck Boulevard, Royale Hemlocks. Because of poor transportation planning in Bedford, there is no north-south road connecting all these developments other than the Bedford Highway. This is a huge lost opportunity, and a direct transit route connecting all these developments will be hard or impossible to establish in the future.

Recommendations:

RP+5 must introduce more concrete policy to ensure new communities are built such that they can be connected.

The RP+5 should have a transit functional plan and establish very clear commitments to a cohesive transit network, including a commitment to identifying a high-frequency transit network in the urban core. IMTB has provided an *example* in the Pocket Guide. **This is how you can achieve objective 2.**

Land Use By-law

The current RP+5 draft intends for detailed transit-oriented design policy to reside in the Land Use By-laws (LUBs) and secondary plans. Although these regulations belong in the LUBs and secondary plans, most of HRM’s planning documents are outdated and do not have these policies. There are many examples of progressive development regulations that focus on street connectivity and walkability – LEED for Neighbourhood Design and the Smart Code are just two examples. Without better policies, new developments will likely repeat the mistakes of older developments, and we will continue to build communities that are difficult or impossible to serve efficiently with transit.

Recommendations:

More specific transportation and community development policy in the Regional Plan that will encourage transit friendly communities and enable the development of detailed regulations in the LUBs.

The addition of maps showing proposed higher order transit routes and the right of ways required to support these routes.

HRM *must dramatically* speed up the process of reviewing and updating LUBs and creating secondary plans to fill this huge policy and regulatory gap.

Road Reclassification

This draft seems to continue planning for cars, rather than other modes of transportation. For example, map 8 reclassifies many “minor” streets in the Regional Centre as “major collectors,” shifting from equal priorities for driveways, parking and through-traffic to just through-traffic. This does not create urban communities in which people *want* to live, work, and play. If these streets are largely commuter-oriented then local traffic, cyclists, and pedestrians fall behind as private vehicular traffic is able to speed through.

Recommendation:

Map 8 should be removed from the Regional Plan and chapter four of the RP+5 should *equally* prioritize active transportation and transit priorities

Detailed Transit Plan and Prioritizing Transit

As noted earlier, a detailed plan with measurable targets and concrete steps, is the hallmark of a good plan. You have achieved this in Chapter 4, section 4.2.5 and Table 4-1 Road Network. What is striking though is the obvious lack of detail and the vague terms used to talk about transit in the very same chapter. In reading chapter 4, one cannot help but feel how unimportant and small transit is, in the general terms it is dealt with, when compared to the specifics and strength in which road networks and automobile traffic are discussed.

In 4.2.3, the RP+5 states that “investigating new services such as rail, bus rapid transit, and expanded ferry service will continue to be priorities for Metro Transit”. While this is a hopeful and optimistic statement, it illustrates how truly vague the RP+5 is when it comes to transit; there are no goals, no targets, and no actionable items.

Recommendation:

Put more effort into long-term transit planning in HRM including:

- Equal emphasis, care, and detail into transit planning that HRM puts into road networks and traffic “solutions”
- Objectives and targets for transit ridership and decreasing vehicular traffic
- More detailed planning around how to achieve those targets
- Action items on investigation, consultation, and piloting of new transit solutions
 - Examples: fast-ferry, rapid bus transit, rail

Conclusion

The five-year review is focused on accommodating the current plan, not changing or updating it. As the CDAC we implore you to be visionary and encourage staffers and council to do the same. The RP+5 should ask what and where do we want to be in 2030? And it should clearly describe how we will get there. As such, the RP+5 should inform all future transit strategic planning processes. Metro Transit’s Five Year Strategic Operations Plan – “Taking Transit to the Next Level” – should implement the bold policies and targets of the RP+5. Without clear direction from the RP+5 Metro Transit will be severely limited in what it can deliver.

The RP+5 reflects and reinforces current traffic patterns, not *better traffic patterns*. It should be clear by now, through the public consultations and town hall, that the current draft of the RP+5 will *not* get HRM to where it should be in 2030. If we want a better city then plan for a better city. This draft needs dramatic change to achieve the goal of a sustainable and forward-looking transportation system and you are the purveyors of that change. Please do our city and our residents justice.

Thank you for considering our feedback and we hope that you will implement our recommendations,

Original Signed

Kaitlin Pianosi
Volunteer
It’s More Than Buses

Original Signed

David Flemming
Executive Director
North End Business Association

Original Signed

Sean Gillis, MCIP
Member
FUSION Halifax

Original Signed

Kristin Lutes
Director, Sustainability
FUSION Halifax

And

Jen Powley, Coordinator, OurHRM Alliance

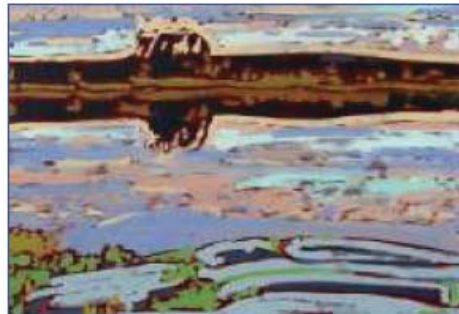
On Behalf of *It’s More Than Buses* and their supporters

Transit should be: Fast, Frequent, Reliable, Integrated, and User-friendly

Reference # 3.66

July 19th, 2013

Regional Planning Office, Halifax Regional Municipality
 2nd Floor
 40 Alderney Drive, P.O. Box 1749
 Halifax, N.S. B3J 3A5
 Sent via email to: planHRM@halifax.ca



Summary and recommendations for the HRM Regional Plan Five Year Review (RP+5)

The Purcell's Cove/Williams Lake/Herring Cove Backlands: Within five minutes of HRM's city centre lies a unique wilderness area that contains six lakes and three ponds, hills with spectacular views of the whole area and dozens of kilometers of informal hiking and biking trails. Our community believes this area must be protected from development so that it can become a resource for the city and an essential part of what makes Halifax a destination of note. While the Regional Municipal Planning Strategy (Draft 2.0) contains laudable basic principles and objectives aimed at the stewardship of just such areas, its approach and key strategies do not yet offer concrete assurances that protection will occur. In light of this we make the following recommendations.

1. ***That the regional planning strategy, under Section 2, identify the entire Backlands as an area in which HRM must exercise a high level of caution to protect the watersheds and wetlands.*** At best, this would mean prohibiting further development entirely. At the least, it must involve limiting further development to what is environmentally sound and does not involve the extension of sewer and water services with its consequent blasting and destruction of watersheds and wildlife habitat.

2. ***That the revised strategy's endorsement of Discretionary Approvals for development (see Section 9.7), specifically those permitted under G-16 (p. 99), be withdrawn or modified.*** As it stands, Clause G-16 allows for just the sort of incremental encroachments that are completely at odds with development that is planned to offer protections in accord with the environmental, recreational and community-based objectives of the strategy as a whole.

3. ***That the Backlands be explicitly identified for consideration as part of the proposed system of urban greenbelts in Chapter 2 of the regional planning strategy.*** We are aware that much of the work in defining and identifying greenbelt areas within HRM remains to be done. However, many opportunities will be lost if nothing is done to prevent encroachment and incremental destruction prior to the completion of the mandated work to establish greenbelts. We know that there is currently an oversupply of serviced building lots in HRM and we fully support revised targets for urban core development leading to less building in the suburban areas surrounding the city center. The revised planning strategy must make clear that HRM intends to consider placing areas currently zoned as Urban Reserve Areas within the greenbelt system.

4. That the unique historical, cultural and aesthetic aspects of the Backlands be explicitly recognized in Chapter 7 of the regional planning strategy. Halifax is a city that needs to be seen as part-and-parcel of its remarkable seascapes and landscapes. The Backlands provide a rare opportunity for this fusion of land, sea, sky and city to be fully realized, and they provide inspiration for local artists and painters to celebrate our beautiful surroundings. They contain many sites of historical significance such as Mi'kmaq gathering areas and portages, the remains from one of Canada's first rail systems, WWII battery placements and the 18th century military road that runs past Flat Lake. These features should be included in description of the city's cultural heritage.

Who we are and why we care

Our group: The current Purcell's Cove Neighbourhood Committee (PCNC), formed in 2012, evolved from various community groups stretching back to the 1970s. Its main aim is to promote, protect and provide a voice for Purcell's Cove as a unique mixed residential and multi-use recreational area within HRM. PCNC is an affiliate of Our HRM Alliance. It coordinates closely with other local groups including those in Williams Lake, Ferguson's Cove and "Area 1" which is the locality between Williams Lake Road and Oceanview Drive. Our website can be found at <http://www.pcnc.chebucto.org/>.

Our community vision: Purcell's Cove is a community with many outstanding features, near the heart of HRM. Only a few minutes commute from the Rotary, it is a special blend of suburban and rural, residential areas and 'pocket wilderness'. Its main features are the cove itself, with its small yacht anchorage as well as unobstructed views of the harbour, Point Pleasant Park and McNab's Island, and a substantial and unique Backlands area that encompasses undeveloped and minimally-developed private land, Crown land and a segment of conservation lands administered by the Nova Scotia Nature Trust.

The roughly 350 residents of the Purcell's Cove area include young families, artists, cultural workers, retirees, professionals, tradespeople, service workers, health workers and the self-employed. It is not a suburb of the city – it is a picturesque corner with substantial natural beauty, a unique social and historical heritage, a special community spirit and a reputation as a welcoming retreat just a stone's throw from the urban core.

Why we want to protect the Backlands: The Backlands is considered to be the wilderness land running between Williams Lake Road in the north and Powers Pond (Herring Cove) in the south, and between



Purcell's Cove Road in the east and Herring Cove Road in the west. We believe that one of the most remarkable aspects of the Backlands is the location of this extensive wilderness area virtually at the city's doorstep. Not everyone in HRM is aware of the existence of the Backlands and the fact that they provide a vital ecological link or 'bridge' between outlying natural areas of HRM and the urban core. The existence of such stunningly beautiful and largely

untouched land with outstanding physical features and lovely views and vistas, so close to the urban core, provides HRM with the potential to become a global model for eco-friendly, community-led natural/recreational resource protection

Geology, flora, fauna and watershed: The Backlands’ geology is characterized by striking ‘whaleback’ granite outcroppings and glacial erratic boulders shaped by the last glacial age. The granite itself is 380 million years old, while the whalebacks were shaped approximately 10,000 years ago. There are at least three scenic high points in the Backlands with an elevation of roughly 80 metres or 250 feet, including Piggy Mountain with clear views of Chebucto Head and peninsular Halifax.

In addition to the approximately 100 acres of land administered by the Nova Scotia Nature Trust around Purcell’s Pond (see www.nsnt.ca), other groups such as the Williams Lake Conservation Company (WLCC, www.williamslakecc.org) and the McIntosh Run Watershed Association (MRWA, www.mcintoshrun.ca) are concerned with and working actively to publicize and protect the unique features of the Backlands. The WLCC has commissioned several excellent studies pertaining to birds, watershed features and vegetation.

The watersheds of the Backlands form a contiguous area of granite outcrops and wet valleys which are home to a remarkable amount of wildlife. Within the lands administered by the Nova Scotia Nature Trust alone, dozens of species of plants, birds, lichens and insects have been observed. There are also regular sightings of rabbit, beaver, muskrat, mink, coyote, fox and deer. The uniqueness and rarity of these pristine urban fresh water landscapes and watersheds form a ‘jewel in the HRM crown’ of such value as to warrant further consideration for serious protection and stewardship.

Cultural, aesthetic, historical, social and recreational: Indian Cove at the north end of Purcell’s Cove (formerly Mackerel Cove) was a long-established site where the Mi’kmaq fished and celebrated festivals.

Indian Path nearby was the head of a network of trails used to access the fishing lakes and hunting grounds in the Backlands. Established in 1759 at the founding of Halifax, the historic granite and slate quarries of the Backlands were used to build the forts, batteries and many historic Halifax buildings. The quarries extended from Indian Cove to the plateau 70 metres above, which are still strewn with significant industrial artefacts. In 1834 the quarries started using a steam



railroad (possibly the first industrial railway in Nova Scotia) to access the quarries and the old tramway bed is well preserved. Old maps in the Nova Scotia archives show a road connecting the military batteries above Ferguson’s Cove with Spryfield through the heart of the Backlands. Although mostly overgrown, some segments show sturdy stonework beds.

The Backlands contain an extensive network of informal trails for hiking and mountain biking and it is regularly accessed by such groups as the Halifax Field Naturalists and the Chebucto Hiking Club. The MRWA has done a remarkable job in mapping out potential formal trails on existing HRM and Crown

lands in the southern Backlands adjoining Herring Cove, and we fully support their efforts to establish a trail network that can be accessed and enjoyed by anyone in HRM.

The Backlands is also the subject of local painters and photographers whose works of art remind us that the extraordinary rugged beauty of the area is worth appreciating for its own sake. For example, the work of landscape painter Geoffrey Grantham, recently chosen as a CBC 'Sharing the View' artist, provides a compelling first-hand visual record of the Backlands' many moods and seasons (see www.swoonfineart.com/index.php?/site/artist/geoffrey_grantham).

Our concerns about the HRM Regional Municipal Planning Strategy (Draft 2.0)

Greenbelting as a concept and practice: Given our deep-rooted interest in preserving the quality of life in HRM, PCNC welcomes the chance to respond to the current draft of the HRM regional plan. We see this as an opportunity to share with others the special features and assets of the Backlands in its entirety, as well as highlight the need to provide effective regional stewardship for these areas. As a member of Our HRM Alliance, we fully endorse the focus on the use of greenbelting to concentrate growth in the urban core and preserve natural areas and eco-services (see www.ourhrmalliance.ca/1-use-greenbelting).

We believe that the urban greenbelt concept presented in Chapter 2 of the draft planning strategy is very important for the future preservation and effective collective use of the Backlands, and we applaud its prominent placement in the plan. The inclusion of this concept implicitly recognizes that a regional municipality is much more than simply an area in which economic development takes place. It is also a location to foster a rare synthesis between quality of life, social/cultural values, human well-being and the environment. However, like several other groups in the HRM, we have deep concerns about how this concept is presented and the lack of specific description about how it is to be put into practice. We would like to highlight the following issues:

- ***There is still a significant gap between the theory of the urban greenbelt and its practical application.*** While the principles on page 8 of the plan allude to the need to ensure opportunities for protection of open space, wilderness, natural beauty and sensitive environmental areas, these ideas are not yet enshrined at a functional or practical level in Chapter 2. To us, 'greenbelt' means lands that communicate and connect as well as allow enjoyment of wildlife and expansive natural areas, not just isolated corridors, pockets or small blocks that are hived off from developed areas. Specific areas with at least the strong potential for urban greenbelt inclusion (such as the Backlands) need to be more explicitly highlighted in the plan.
- ***In-depth consideration of which areas to include in the greenbelt is deferred to the creation of a Greenbelting and Public Spaces Priorities Plan at some future date.*** While in theory this sounds fine, in practice it does not foster any confidence among our group and many others that the greenbelt plan is likely to be finalized before further development of the Backlands takes place. We are worried that culturally and aesthetically significant areas

will not be protected from imminent private development *before* greenbelting is seriously discussed as an option. The Backlands contain what could be considered as ‘regionally significant’ vistas and views that are part of our cultural and aesthetic heritage as HRM and they are equally important to the cultural richness of our area as are any built heritage areas. For the sake of consultation and fairness, it is important to mention in the plan that *all* areas with identified greenbelt potential are open for discussion and inclusion in spite of current zoning designations such as “urban reserve”.

- ***The linkages between innovative economic diversification and ecological protection are not very explicit in the current draft of the regional planning strategy.*** We believe that more could be done to cross-reference the advantages of green-centred economic growth and clean technology with the need for an urban greenbelt that includes the Backlands. Due to their proximity, there is huge scope for innovative new ventures in the Backlands such as forest schools, art education retreats, artists-in-the-environment workshops, ecological stewardship centres and eco-tourism. These types of low-intrusion initiatives can exist side-by-side with protected recreational facilities and extensive wilderness areas.
- ***Inclusion of the Backlands in the urban greenbelt can assist HRM in meeting its targets for urban densification and contribute to the reduction of HRM’s carbon footprint.*** We believe strongly that the vision of a wilderness greenbelt area surrounding compact urban growth areas is a means not only of promoting a healthy community but also attracting more people to live within the urban core in line with overall HRM urban densification targets. Their proximity to the urban core makes them an ideal location for HRM to showcase the advantages of having a scenic wilderness area close to downtown which can be reached by bicycle and public transit. Further suburban sprawl can be avoided by leaving the Backlands an attractive undeveloped recreational area with easy access to the city’s downtown. Citizens will not have to move into outlying areas to enjoy the benefits of being close to extensive forested areas which also have the benefit of helping to keep the city’s air clean.

Overall, we believe that there is significant prestige to be gained for HRM (both nationally and internationally) if the true potential of the urban greenbelt is realized. The Backlands, incorporating the McIntosh Run watershed, is the great landscape entity that remains so close to the downtown core. To lose these would seriously undermine HRM’s potential as a socially and ecologically progressive community, and also alienate many sympathetic citizens. If some aspects of wilderness remain as close as possible, there is likelihood of enhanced appreciation of its benefits. There is an emphatic need for the draft planning strategy to incorporate serious consideration of these issues as a counterweight to the widely perceived pro-development bias of other sections of the document.

Urban reserve, discretionary approvals and Clause G-16: Portions of the Backlands are currently Crown or HRM land, but in the area immediately south of Williams Lake and behind Purcell’s Cove itself there remain private lands zoned as ‘urban reserve’. In theory, the urban reserve designation allows for slow-paced, ‘as-needed’ development. In practice, however, there is deep distrust of the political process in

our community because we are convinced that private developers, bureaucrats and politicians are unwilling to consider alternate visions for this area.

Clause G-16 has become the focus of concern for many groups who have commented on the draft planning strategy because it allows precisely the kind of development via a discretionary process that heads us down a slippery slope and away from the main objectives of the planning process. Clause G-16 permits Council to allow development in property that “abuts” land that has been built upon. It permits development in property that is across the road from land that has previously been developed. But, one might ask whether there is any land that is not abutting or adjacent and therefore immune to development using this discretionary power?

A more detailed sub-area plan is still needed for the entire area surrounding Purcell’s Cove which will help to identify the unique assets and opportunities of the Backlands and adjoining areas, *before* more development takes place. Some segments have already been subject to residential housing development and there are concerns that water quality and semi-rare species of plants and insects have been compromised. Studies are on-going to determine the extent of this intrusion. There are huge (and to us, fully justified) concerns that the significant natural, aesthetic, historic and recreational opportunities presented by the Backlands will be lost before there is a chance to consider the options. Overall, given the sensitivity of the situation, we do not believe that there exist sufficient checks and balances against the potential abuse of Clause G-16 by developers.

We understand that there are some qualifications on the discretion endorsed by Clause G-16. It specifies that amendments may be made only “[p]rovided other policies of this Plan are satisfied...” (p. 99). Given the policies identified throughout the plan, one might suppose that this discretion was already highly limited. It would seem, for example, that discretion would be limited by the policies spelled out in Chapter 2, E-1 where subsections d, k, o, p, and q, require protection of trail and greenway networks, wetlands, environmentally sensitive areas, natural corridors and cultural landscapes respectively. But this clause really points to work that remains to be done. Without specific directions, discretionary approvals can proceed without consideration of what *should be* included within the Open Space and Natural Resource Designation. If Clause G-16 is not dropped, we recommend that the revised planning strategy identify mandatory policies that *must be* considered before granting discretionary approval for any development.

In relation to any or all of the above comments and input, our working group (see below) involved in the preparation of this letter would be very happy to provide any further information as required. We are able to share references and background documentation to support the points made in this letter. We look forward to receiving acknowledgement from the HRM Regional Planning Office regarding our input and we hope that our information will contribute to a more precise and responsive regional planning strategy.

Yours sincerely,
Members of the PCNC Working Group

Lesley Armstrong (PCNC chair) 477-0408 la@ca.inter.net
Marcos Zentilli 477-6854 zentilli@eastlink.ca
Vince Purcell 499-2000 dvpurcell@gmail.com
Nathan Brett 477-3814 nbrett@dal.ca
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Anne Gillies 477-3814 gilliesae@yahoo.ca **

** Please direct all correspondence and follow-up requests to Anne Gillies until further notice.

Cc: clerks@halifax.ca for distribution to Mayor Mike Savage and councillors; Our HRM Alliance (hrm@ecologyaction.ca); supporting partners, members and community groups

Painting (page 1) courtesy of Geoffrey Grantham. Photographs courtesy of Geoffrey Grantham, page 2; NS Archives, page 3.

Reference # 3.67

July 11, 2013

To whom it may concern:

We are writing to you as co-chairs of the QUEST (Quality Urban Energy Systems of Tomorrow) Solar Subcommittee that was convened to review passive solar reports prepared by *Genivar* and *Green Power Labs* for the Environment & Sustainability (E&S) Standing Committee. The Solar Subcommittee has been asked by the E&S Standing Committee to prepare recommendations for Regional Plan Review, which will be submitted by fall.

The committee has identified several short term and long term recommendations that will be included in the report. In the meantime, the committee felt it was important to provide comments during the public consultation period of the Regional Plan Five Year Review. The committee believes that careful consideration should be given to identifying and implementing measures to include passive solar and solar ready housing in land use planning, including a clear policy regarding “right to light” and development of robust solar orientation land use policies that take into consideration the unique characteristics of rural, suburban and urban development.

We thank you for the opportunity to provide comments on this very important initiative.

Sincerely,

Evan MacDonald,

Co-chair QUEST Solar Subcommittee

Mark Raymond, Ph.D.

Co-Chair QUEST Solar Subcommittee

Reference # 3.68



July 19, 2013

Dear Ms. Corser:

The eight Business Improvement Districts of HRM are dedicated to serving the commercial interests of the region's traditional downtowns and main streets. Collectively, we represent more than 30 per cent of HRM's total commercial assessment.

The goal of the Regional Plan is to direct growth in an economically viable and sustainable manner. While the Regional Plan sets out clearly defined objectives and guidelines for residential development, it lacks provisions for directing commercial development and preventing commercial sprawl.

Currently, there is a clause in the plan that states: "HRM may consider permitting private business parks in appropriate locations within or adjacent to designated growth areas."

While we understand the need for a variety of different types of business area models for different purposes, we have some concern with this statement. Having felt the direct impact of poorly planned business area development, we have the following questions and observations:

- What are "appropriate locations" and how is this defined in the plan? Is it a distance from existing business areas, a population threshold, etc?
- The statement does not seem to be in the context of any relevant research on current Business Districts and Business Parks. (availability, vacancy rates, tax base, proposed businesses looking for locations, long term sustainability, etc). Much like residential development, should we not work to focus development in areas with existing infrastructure first? What research exists to support this policy?
- The policy statement does not prudently consider any impact on existing taxpayer funded Business Parks nor on the eight municipally designated Business Districts.
- How are the construction of "adjacent business parks" and "designated growth areas" dealt with on a policy level in terms of time? Is there a population threshold that must be met first? Is there specific infrastructure that must be in place first?

- The Regional Plan states that residential development should make the best use of existing infrastructure and avoid unnecessary expense. We believe the same objectives should apply to commercial development. We would like to see Council develop a coherent plan for commercial development that considers the impact on existing commercial districts in HRM and ensures that new development is sustainable.

Sincerely,

Karla Nicholson
General Manager,
Quinpool Road Mainstreet District Association

CC Austin French, Manager of Planning
Jane Fraser, Director of Planning
Dale Godsoe, Chair of Community Design and Advisory Committee
Kasia Tota
Mayor Savage and HRM Councillors

Reference # 3.69

July 17, 2013

Dear Mayor Savage,

I am writing in response to the Regional Plan 5 Year Review Draft 2.0, with a focus on Chapter 4: Transportation. My interest in transportation within Halifax Regional Municipality (HRM) comes from being a commuter from Halifax to Dartmouth who does not own a car and therefore depends on walking, cycling, and public transit. I engage in transportation issues in Nova Scotia regularly as a volunteer with the Transportation Issues Committee of the Ecology Action Centre. I appreciate this opportunity to further participate by providing feedback on the Plan, as changes must be made if HRM is to reach the stated goal of an effective transportation system that is both environmentally and fiscally responsible.

The ideas on which the Transportation chapter are based are encouraging. I particularly agree with an emphasis on streets designed for all ages, abilities, and modes of travel and a priority use of alternatives to single-occupancy motorized vehicles. I also appreciate the recognition of the connection between transportation and land settlement patterns, but specifics of directed growth and greenbelting must be expressly addressed in appropriate areas of the Regional Plan for this to be best implemented.

The acknowledgement of various transportation modes in the current Plan is not sufficient; details of how citizens will be encouraged to increasingly choose sustainable transportation options over single-occupancy automobiles must be included. The inclusion of a thoroughly explained Road Network Priorities Plan without any similar listing of sustainable transportation projects is in opposition to the initial message of prioritizing alternatives to motorized vehicles. The stated purpose of the Road Network Priorities Plan, to facilitate the effective and efficient movement of people and goods and services, will be better executed with a concomitant focus on sustainable transportation modes, as projects that advance the uptake of sustainable transportation will lessen required vehicle capacity, including parking, and traffic congestion. Costly car-focused projects, particularly the widening of Bayers Road and a third harbour crossing, must be removed from the Plan and a priorities plan for sustainable transportation projects should be included. It is difficult to believe an appropriately designed transit service, active transportation network, reduced single-occupant vehicle commuting, and investment in car-sharing options will be pursued when the only detailed projects provided are solely car-focused.

The personal automobile is an incredibly convenient transportation mode and it has become deeply ingrained in the daily life of many HRM residents. HRM must make alternative, more sustainable mobility options much more attractive if we are to reach the vision of increased quality of life through healthy communities and a sustainable environment. This is a challenge, but also an incredible opportunity to provide HRM residents with transportation options that will improve their quality of life and that of all fellow citizens, as everyone benefits from reduced traffic congestion, improved air quality, a greater sense of community, and increased savings through less infrastructure costs and a healthier population. Increasing the number of HRM residents who regularly walk, cycle, carpool, and use public transit benefits everyone who lives in HRM, including those who choose to or must heavily rely on a single-occupancy vehicle for transportation.

The Regional Plan 5 Year Review is an important process in determining fiscally and environmentally sustainable future growth and development of HRM. Transportation within the municipality is an essential part of the Plan, as people must be able to effectively access goods, services, and employment. Changes to the Plan are necessary, particularly improved concordance between the goal of reduced dependence on single-occupancy vehicles and concrete projects required to reach that goal.

Thank you for your time,

Sara Rafferty

Reference # 3.70

July 17, 2013

Dear Mayor Savage and the Community Design Advisory Committee (CDAC);

I request that you take my points into consideration when deciding on the Bedford Basin vision – a vision that I have seen change dramatically over the past decade. (Don't such changes and permit expirations require brand new applications and approvals?)

You don't have to look far to see what waterfront developments do. The International Joint Commission has designated Toronto Harbour and 39 residential areas along the Great Lakes as "Areas of Concern" brought about from waterfront developments, similar to the one proposed for the Bedford Basin. These areas now pose above normal health risks to the people and wildlife living there. It's a big expensive problem that the politicians are trying to tackle but don't know exactly how. Moreover, the National Center for Atmospheric Research studies have shown that coastal developments, similar to the one proposed for the Bedford Basin, increase surrounding air temperature and decrease cleansing sea breezes, which means that the air in these areas remains stagnant and more polluted than it would otherwise. The Bedford Yacht Club is already feeling these very real wind changes this summer just from the amount of infill presently there. (Is it reasonable for HRM Council to turn a blind eye to these real-life Canadian examples and extensive coastal development documented studies?)

The proposed Bedford Basin waterfront development and resulting higher density development will bring with it many detrimental consequences to the public:

1. Increased traffic
2. Increased air pollution – compounded by increased traffic and decreased cleansing breezes
3. Increased light and noise pollution
4. An increase in the incidence of health- issues related to poorer air quality and increased stress, especially in those most vulnerable (children and the elderly)
5. Increased water and land pollution from toxic asphalt run-off
6. Increased ambient summer temperatures in the area
7. Increased potential for social conflict from increased population density
8. Increased demand on our public services – such as garbage collection, mail delivery, snow clearing, class sizes, police and fire services, etc.
9. Decrease in native species populating the area, including NS's provincial bird – the osprey

10. Disruption to migratory pathways including juvenile herring and the spotted piper
11. Destruction of a natural reef – (despite many reefs worldwide are under the threat of extinction)

Overall, there will be a decreased quality of life in Bedford and the greater surrounding areas

Then there is the impact of the armor that will be needed to protect public safety:

This waterfront development will alter the shoreline and nature's way of protecting it – meaning the land and infrastructure will be at risk from erosion and flooding from wave and wind activity. And stabilizing the shoreline will require more intrusive behavior including the installation of shoreline armor, sand management and other measures to protect public safety and stabilize the shoreline. The demand for armoring will become even more widespread as the rate of sea-level rises and the shoreline retreat increases, which means more environmental degradation and disruption of species migratory pathways.

Although the scientific community readily understands that armoring a shoreline destroys the natural environment on a decades-time scale, this fact is still widely unrecognized by the public and politicians and usually ignored by coastal planners, developers and engineers. (Has HRM Council, DFO, MLAs or Developers ordered any studies, cost/benefit analysis, planning to be carried out on the armoring process?)

Who will be responsible for the construction of [seawalls](#), [jetties](#), [offshore breakwaters](#) and [groins](#) intended to hold shorelines in place after development? Who will be responsible for the ongoing maintenance of this shoreline armor? Who will be responsible for erosion, flood control damage and environmental degradation over the decades? My guess is not the developers. (Will taxpayers be on the hook for this?)

No one can claim that this will be eco-friendly development because everyone knows that there is no such standard. And surely Council is not simply accepting the Developers' reassurance that good engineering, a little green space and buffer zone, and green architecture (green roof-tops I read) will protect the Basin and the public from the pollution generated by new, denser urban growth. How could any Council member accept such claims – when there has been a dearth of studies or monitoring carried out – (with the exception of the traffic-corridor study that many are anxiously waiting for). A strip of green is not a real buffer to the detrimental impacts of the proposed development plans.

The Bedford Basin is a sensitive and unique landscape. Nova Scotia is also unique in that it has a large amount of pyritic slate that needs safe disposing/neutralizing after it is dug up to enable development. But continued Basin infilling and then building on top of that infill to kill a few birds with one stone is a short-sighted approach that is neither environmentally or financially sustainable, nor environmentally and socially ethical – despite the DFO permits and the developers' plans. The Bedford Waterfront development plan is a downward spiral for all.

In closing, I want to emphasize that any plan for the waterfront is a delight if you are developer, an investor seeking new business, a politician looking to boost economic numbers for a term or two but a bad deal for everyone else. As a resident of HRM, I am here to remind the decision-makers about these detrimental effects this development will bring to the general public and that there are much better solutions to growth - waiting to be put forth.

Council members are the ones that will ultimately decide on the Basin's development policies and hence, Bedford Basin's fate. I hope that you have the wisdom, foresight and will to serve in the best interest of the general public.

Thank you for your valuable time.

Sincerely,

Teresa Ramsay

Reference # 3.71

From: Walter Regan

Sent: July 17, 2013 12:09:31 AM (UTC-04:00) Atlantic Time (Canada)

To: Regional Planning Office, HRM

Cc: Corser, Susan; Tota, Kasia

Subject: Daylighting Policy Should be made Stronger

In Draft 2 of the RP+7, pg 87 Under SU-11,

Daylighting is mentioned.

To make it clearer and to strengthen it,- it should say “shall consider” rather than “may consider”, and it should reference the possibility of partnering with NGO’s and accessing habitat funding.

May consider is very weak, meaning staff can ignore the policy safely.

Thanks

Walter

Reference # 3.72

From: Theresa Scratch

Sent: July 19, 2013 11:59:38 AM (UTC-04:00) Atlantic Time (Canada)

To: Regional Planning Office, HRM

Cc: Craig, Steve; Mason, Wayne; Watts, Jennifer; Nicoll, Lorelei

Subject: Response to RP+5 Draft

July 19 2013

To whom it may interest,

I am forwarding these comments regarding the recently released Draft of the RP+5 to PlanHRM as well as my Councillor and Councillors serving on the HRM CDAC.

Chapter 3

Page 2

Amendments to this Boundary [Service Boundary] may be considered:

(a) where reviews of regional population and housing forecasts have been undertaken and the proposed amendments may assist in achieving the growth targets established by this Plan;

and (b) there are adjacent lands if the lands are within a growth centre.

My Comment

Growth targets should not be the foundation for a Community Plan.

This Chapter lacks definitions for: low, medium, and high density.

3.2.3.1 Rural Commuter Designation

The watershed servicing studies have also revealed that the provision of central municipal water and wastewater management services to rural growth centres may be cost prohibitive. **There have also been challenges to developing by-laws for Wastewater Management Districts** and a number of very large scale subdivisions have been proposed for which the wastewater management systems will have to be maintained by a condominium corporation. There is a need to develop an approach where larger house lots may be developed within a Conservation Design Development to enable servicing with individual on-site septic systems and wells.

My Comment

Please note above for discussion later:

3.4.1 Conservation Design Developments

My Comment

There were important positive changes in Policy S-12, S-13 and S-18 regarding "Open Space Design" or Conservation Design.

S-12

(d) for the purposes of this Policy, "net developable land" shall exclude riparian buffers, wetlands, 1 in 100 year floodplains, and slopes in excess of 30%;

My Comment

The exclusion of the environmentally sensitive lands from the "net developable lands" for dwelling density calculation is a positive change from the 2006 Plan. In a previous approved development, under the 2006 policy, the dwelling density was calculated on landmass, which included existing structures and over 50% of the acreage was riparian buffer. Permitting areas such as riparian buffers for calculation purposes increases the potential for development density which was otherwise not reasonably possible. Existing structures and or development to remain on site should also be excluded from the net developable area, including any required setbacks.

(f) that approximately 50% of the net developable area Classic Conservation Design- Shared Services Development is preserved as open space;

My Comment

Again the "net developable" area provides for the open space as opposed to lands already known as unsuitable for dwelling development like riparian buffers and floodplains. To be of a conservation benefit, lands in excess of the known sensitive areas should be set aside as open space.

(g) the open space portion of the development may be used for forestry, agriculture, passive recreation, conservation-related uses or the placement of wastewater management facilities, community wells or other community facilities designed to service the development;

My Comment

There is no definition of "community facilities designed to service the development" nor controls on size and types of use. Are there any requirements or limitations on facilities to service the development? Can they be commercial facilities? If the Regional Plan is to eventually replace the

individual Community or “Secondary Plans” these vague statements do not serve our community planning interests.

(h) the types of land uses permitted within the development may include single-unit, accessory dwellings, and two-unit dwellings, associated public or privately-owned community facilities, home-based offices, day cares, and small-scale bed and breakfasts;

My Comment

What is an accessory dwelling? What is considered an associated public or private facility? What is the definition of “small scale bed and breakfast”?

(j) the parcel of land to be developed only has frontage on a local road with a minimum of 20 metres of contiguous road frontage;

(l) all roads within the development are public roads designed to appropriate municipal standards;

(m) no private driveway servicing a cluster of house sites shall exceed 3 units;

My Comment

Is the “only” a typo? This is an important amendment to require road frontage which was not noted as required under the 2006 Plan.

This amendment seems to support the fact HRM Subdivision bylaw and Regional Plan will not permit private road development within the Municipality. What is the difference between a private driveway and a private road?

Policy S-18

Notwithstanding Policy E-5, the parkland dedication shall be relaxed to a minimum of 5% for the Classic Conservation Design (On-site Services) and Classic Conservation Design (Shared Services) developments that may be considered pursuant to policies S-12 and S-15.

My Comment

Under the 2006 Plan the Conservation, or Open Space, Design developments were approved as developments under single ownership such as Condominium Corporations due to requirements of Provincial Legislation that dwellings must be on the same lot as their sewage treatment system. As there was no HRM requirement for subdivision there was no requirement for parkland dedication under Policy. Does this remain the issue or has the subdivision Bylaw been changed to reflect the 5% requirement.

Is the reference to Policy E-5 an error?

Policy S-28, page 55, refers to a local road and a non local road.

My Comment

What is a “non local road”? Is it all of those other streets classified under section 23 of the Regional Subdivision Bylaw below?

23 The design of all public streets or highways in a subdivision shall be approved by the Engineer and shall be designated as one of the following classes of streets:

- (a) local street
- (b) local industrial
- (c) minor collector street
- (d) major collector street
- (e) arterial street

My Comment

Page 47 footnote below is incomplete.

16 Net Density excludes riparian buffers, wetlands, slopes in excess of 30% and floodplains from the calculation of.....

Chapter 8

8.6 Rural services

8.6.1 Water Service Areas

“Provincial regulations allow for communal on-site sewage disposal systems, subject to approval of a management plan. A management plan must contain measures to ensure land owners are responsible for the maintenance of these systems.”

My Comment

The Provincial Regulations' “management plan”, is a storage and disposal system, for communal systems defined under those regulations and the regulations do not contain measures for ongoing maintenance. In fact NSE does not have the legislative authority to require ongoing maintenance, however HRM has the legislated ability to establish a bylaw requiring such maintenance.

SU-15 HRM may consider establishing new Water Service Areas, subject to the financial ability of HRM to absorb any related costs, provided a wastewater management plan is also considered in accordance with Policy SU-19, if:

- (a) the area is within a Rural Commuter, Rural Resource or Agricultural centre and it has been determined through a secondary planning process that new growth is to be encouraged in this area;
- (b) an Open Space Design development is proposed within a Rural Commuter, Rural Resource or Agricultural centre pursuant to Policy S-16;
- (c) the lands are adjacent to an existing Water Service Area and an Open Space Design development is proposed within an Urban Reserve designation pursuant to Policies G-16 and S-16;
- (d) a study has been prepared by a qualified person verifying that there is a water quality or quantity problem in an existing community that cannot reasonably be rectified by an alternative means; and
- (e) the new service area and a charge needed to pay for growth related improvements to the water or stormwater services has, where required, been approved by the Utility and Review.

My Comment

Many changes to the Policies under Rural Services have been to the numbering of Policies, however the references to policies do not correspond to appropriate Policy.

The RP+5 Draft Policy SU-15 is word for word Policy SU-13 of the 2006 Plan. An error in reference to Policy S-19 was made in the Draft.

The 2006 Regional Plan SU-13 Policy requires consideration in accordance with Policy SU-20 of the 2006 Plan.

The RP+5 Draft Policy SU-15 requires consideration of Policy SU-19 when it should require consideration of Policy SU-21 of the Draft.

Regional Plan 2006

SU-20 To protect public health and the environment, HRM shall investigate a means to ensure that on-site sewage disposal systems are maintained. Without limiting the generality of the foregoing, consideration shall be given to adopting a maintenance by-law, establishing Wastewater Management Districts and establishing a funding mechanism with the Water Commission administering a wastewater management fee as approved by HRM.

RP+5 Draft

SU-19 HRM shall, through secondary planning processes, consider the potential for establishing Wastewater Management Districts within Rural Commuter, Rural Resource and Agricultural Centres.

RP+5 Draft

SU-21 To protect public health and the environment, HRM shall investigate a means to ensure that on-site sewage disposal systems are maintained. Without limiting the generality of the foregoing, consideration shall be given to adopting a private on-site sewage disposal system by-law, establishing Wastewater Management Districts and establishing a mechanism(s) for funding and administration.

My Comment

It is obvious that Policy SU-15 is referring to SU-21 of the Draft and not SU-19.

HRM and Regional Plan Policy recognize the importance of regular maintenance to protect public health and the environment. There is however no wastewater management bylaw to ensure these systems are maintained. In fact HRM in the RP+5 Draft acknowledges there are challenges to developing bylaws for Wastewater Management Districts as noted on page 1 of this submission.

As recent as Dec. 2012 Regional Council was presented with a staff report that stated:

"There also have been challenges with long-term ownership and maintenance of communal wastewater management systems. Under the Regional Plan review HRM is exploring the opportunity to move to a "by-right" approval process and also to redesign open space subdivisions to allow greater use of individually operated septic systems while protecting important environmental features. Policy for establishing of wastewater management districts with specific controls on septic field maintenance is also being explored in support of stronger environmental protection for rural areas."

My Comment

Section 8.6.2 of the Draft RP+5 appears to reflect the intent of the RP 2006 to ensure a maintenance program. Although the Provincial Government provided the Municipalities with the legislative opportunity to provide for cluster development on communal services and provided the legal ability to establish controls through bylaws to ensure maintenance of these communal system for the protection of the environment, public health and public purse, HRM has not provided the controls to ensure the communal systems in the approved developments are maintained. These developments should not be considered until HRM has ensured protection of public health and the environment.

The Regional Plan intent and Policy seem to acknowledge the "need" for controls over the long term monitoring and maintenance of on site sewage systems. Is it the intent of HRM to assume responsibility to ensure ongoing maintenance in developments that are dependent on communal systems?

RP+5 Draft

SU-16 HRM may consider expanding existing Water Service Areas to existing communities, subject to the financial ability of HRM to absorb any costs related to the expansion, if:

- (a) the lands are in proximity to a water transmission main planned or constructed by Halifax Water to improve the performance of the water distribution system;
- (b) a study has been prepared by a qualified person verifying that there is a water quality or quantity problem that cannot reasonably be rectified by an alternative means;
- (c) there are environmental concerns related to the long-term integrity of on-site sewage disposal systems and a wastewater management plan is also considered in accordance with **Policy SU-20; or**
- (d) an area charge needed to pay for growth related improvements to the water, or stormwater services has been approved by the Utility and Review Board or Halifax Water has advised that an area charge is not required.

My Comment

Policy SU-16 is almost identical to the original Policy established under Halifax County Municipal Government to address the potential negative planning and fiscal issues related to the expansion of water service areas or districts. The major difference in the RP+5 is under section (c) and the use of the word " or" as opposed to "and", which is used in existing MPS documents approved prior to amalgamation. Section (c) should also read in accordance with Policy SU-21. This was the same error made under Policy SU-15 of the RP+5 Draft.

Thank you for the opportunity to comment on the Draft Plan. Further comments will be made during future opportunities for public comment.

Respectfully submitted,

Theresa Scratch

Reference # 3.73

Dear Chairwomen Dale Godsoe and Members of the Community Design Advisory Committee,

On behalf of Seven Lakes Development Limited, please find attached a letter from GENIVAR Inc. requesting the Community Design Advisory Committee recommend the revision of key policies pertaining to conservation design communities contained in Chapter 3: Settlement and Housing (second draft).

Policies S-15 and S-16 of the 2006 Regional Plan inspired Seven Lakes to have a vision of developing conservation communities in central Porters Lake. These policies led them to acquire over 1,700 acres of land in the area. After four years of collaboration and effort they received approval for developing the first 634 acres as a leading edge Classic Conservation Community.

They are deeply concerned that certain proposed policy changes contained in the second draft of the Regional MPS do not support their desire to continue developing conservation design communities within the Rural Growth Centre of Porters Lake. The proposed Porters Lake Growth Boundary, density limitations, and unit limitations on shared private driveways will remove their ability to develop the remaining lands under proposed Policy S-12 and also risk increasing annual maintenance costs for HRM.

We are grateful for the consideration of the committee and look forward to hearing from you soon. If you require any additional information, or would like to discuss our request, please contact the undersigned.

Kind Regards,

Jeffrey Haggett, BCD (MUDP)

 GENIVAR



July 17, 2013

Mrs. Dale Godsoe
Chair, Community Design Advisory Committee
c/o Halifax Regional Municipality
P.O. Box 1749
Halifax, NS
B3J 3A5

Dear Madam Chair & Members of the Community Design Advisory Committee:

Congratulations to the Community Design Advisory Committee (CDAC) on your efforts to review and revise the Regional Plan for Halifax Regional Municipality. Your concerted effort over the past year listening to the community and exploring progressive policy options is appreciated.

On behalf of Seven Lakes Development Limited, GENIVAR is writing you today to encourage and support RP+5 proposed growth Policy S-11. In part, this policy designates Porters Lake as a Rural District Growth Centre. For the past four years, Seven Lakes has been committed to and has been working towards this goal. Their first project will assist HRM partially meet this objective, however as a result of the proposed policy changes, Seven Lake's long-term goal and ability to Policy S-11 is at risk. These policies include:

- **Restrictive Rural District Growth Boundary**
The proposed Porters Lake Rural District Growth Boundary of 2.2 km (Map 15E) prevents Seven Lakes from following through on their long-term goal of bringing high-quality, community focused conservation design development to Porters Lake over the next twenty (20) years.
- **Density for Classic Conservation (Option 2) could limit housing diversity options**
There is concern that the proposed density of two (2) units/hectare (Policy S-12 (b)) risks decreasing the viability of conservation design offering homes at a variety of prices, especially under \$300,000.
- **Local Road Limitations**
If the goal is to encourage conservation design in Rural Growth Areas, Policy S-12 (l) and (m) seem onerous and restrictive.

Committed to and experienced in planning and implementing Conservation Design

Policies S-15 and S-16 of the 2006 Regional Plan inspired Seven Lakes to have a vision of developing conservation communities in central Porters Lake. These policies led them to acquire over 1,700 acres of land in the area.

Being amongst the first to apply under new policy, Seven Lakes anticipated approval taking extra effort; designing conservation communities requires detailed environmental analysis and extensive collaboration with the community. However, the planning and design process to facilitate development of the initial 634 acres took four years to complete, much longer than originally envisioned. Despite the extra time required, Seven Lakes continued to collaborate with HRM and was committed to achieving mutual goals.

This past May (2013), the planning process concluded with the Harbour East – Marine Drive Community Council unanimously approving the Development Agreement (DA) for The Villages at Seven Lakes. It was exciting to witness the majority of community members who spoke at the Public Hearing in support of the development.

The Villages at Seven Lakes exhibited their commitment to minimizing environmental impact and contributed to the community character by incorporating the following key principles and design characteristics (please see attached concept plan):

- **Diverse range of home choices** (634 units on 634 acres) that respects the emerging character of the community.
- **Protects 60% of the natural landscape** (380 acres) through an open space network that includes wetlands, riparian buffers, steep slopes, protected species habitat and significant views.
- **New amenities for the region** featuring five new community parks, including a sports field, and two public lake accesses.
- **Low-impact development** that encourages recharge of the water table through proper stormwater management respecting pre-development flow and tertiary wastewater treatment systems that incorporates natural processes.
- **Lower cost to HRM**, because all water, wastewater and local driveways will be the responsibility of the condominium corporations. All systems and roads will be built to standards outlined by HRM.
- **Protect the water table** by using shared wells and water conservation design into each home and testing of water capacity and quality at each phase.
- **Hiring and purchasing from local businesses** whenever possible.
- **Support alternative transportation options** including the MusGo Rider Cooperative and the new Metro X transit line.
- **Support active lifestyle options** through a proposed public multi-purpose trail. Seven Lakes is working closely with HRM to consider a 7km trail that connects each of the public parks and are pleased that the DA offers an avenue to incorporate the potential for a trail, if it is the wish of Council.
- **Support infrastructure improvements**, including major investments to intersections on Trunk 7.

Seven Lakes sees their commitment in Porters Lake as long-term. Towards this goal, the already approved DA incorporates a road network that connects to the anticipated future development on the remaining lands. This road network was accepted and encouraged by HRM.

As the approved DA exhibits, Seven Lakes is deeply committed to the principles of Conservation Design and building communities that respect rural character. They have invested in collaborating with professionals, community groups and HRM staff in designing conservation communities. However, the proposed changes to conservation design policy put their investment and long-term goal at risk.

Increase the growth boundary to support policy goals

Seven Lakes owns an additional 1,100 acres adjacent to the approved development (see attached map). There is intent is to develop this additional acreage to the same conservation design standards of the approved 634 acres. However, the proposed boundary for Porters Lake Rural District Growth Centre (Map 15E) would not enable a conservation design development on their land.

It is our understanding that the proposed growth boundary is based on facilitation of a regional water service area/district and the assimilative capacity of the watershed. However, if the community and Council decide not support the development of a water servicing district and the associated costs, the growth boundaries may need to be expanded.

Another limitation of Porters Lake Growth Boundary is the requirement of a conservation community being located on a local road (proposed policy S-12). From our research, there are only 15 properties within the boundary that satisfy this policy. Of these 15, only a few are viable for Conservation Design development because of either limited acreage or restrictive environmental features (i.e. over 30% of the property being wetlands). The largest lot in the growth centre is 100 acres which may sustain development of 60 units. All other lots in the proposed Growth Boundary are smaller and may not be developed using conservation design due to the additional expense of planning and approval.

It is understood that the CDAC and the revised Regional Plan does not want to shut down development in the rural region; rather the intent is to have it managed in an environmentally sensitive manner that will not result in additional infrastructure costs. However, the proposed local road requirement, the assumption of community approval for a water service district, in combination with the growth centre boundary, risks limiting longer-term development in this

region. Not increasing the growth boundary could result in the plan not realizing desired rural growth targets, nor encourage development within Rural Growth Districts

Request:

Alter the Porters Lake Growth Boundary from a 2.2 km radius to a 3.8 km radius (please see attached plan). In our opinion, this revision would incorporate potential drivers of development such as approved development, ownership, economics and experience.

The alteration of the Growth Boundary will permit HRM to build on the 2006 Regional Plan and permit Seven Lakes the opportunity to develop its additional 1,100 acres in a manner and form that encourages environmentally sensitive development in the Porters Lake Rural Growth Centre.

Density and scale increases capacity and accessibly priced housing choices

The scale and scope of the project is an important consideration. The size of the development increases the capacity to deliver the community assets listed above, supports local community services, increases green space, reduces impact to HRM costs and encourages support for alternative transportation choices. Seven Lakes also considers the impact of the new developments scale on the existing community, and anticipates the 634 unit development to take ten (10) years.

The existing policy permits a density of 1 unit/acre (dependent on water capacity) which helps Seven Lakes offer home ownership at a variety of price points attainable for Nova Scotians. The proposed density of two (2) units/hectare (Policy S-12 (b)) risks the viability of conservation design communities offering homes at a variety of prices, especially those under \$300,000.

Request:

Revise the policy to be similar to existing regional Policy S-15 and permit 1 unit/acre of gross developable land contingent on water capacity and quality.

Local road guidelines

If the goal is to encourage conservation design in Rural Growth Areas, Policy S-12 (l) and (m) seem highly restrictive. Policy S-12 (l) requires all roads within the development to be public roads and designed to municipal standards. From our experience with Seven Lakes, all roads will be built to municipal standards as defined in the DA. If policy requires condominium driveways to become public roads, it will create additional maintenance costs for HRM. It would also risk limiting the functional design of shared systems within a condominium, because Provincial condominium regulations do not permit a phased condominium to cross a public road.

Policy S-12 (m) limits the number of units on a shared private driveway. We do not understand this policy. For example, in Seven Lakes, all shared private driveways are built to a defined municipal standard to permit access. By prescribing the number of units on each shared driveway, may in fact limit how the design can respond to the topography as well as limiting design options of the shared water and waste water systems.

Request:

Revise both policy (l) and (m) to encourage that shared private driveways will be developed to a defined Municipal standard. Also all roadways in a conservation design community should be designed to reduce impact to the environment.

Conclusion

Seven Lakes Development Limited is deeply concerned that the proposed policy changes will significantly limit their ability to develop the lands acquired for the sole purpose of constructing conservation communities based on Policies S-15 and S-16 of the Regional Plan (2006).

To support Seven Lakes desire to develop conservation design communities within the Rural Growth Centre of Porters Lake, we request that the CDAC recommend to HRM that the above requests be incorporated into the third draft, or that Seven Lakes existing land holdings be grandfathered and permitted to develop conservation design communities based on the existing Regional Plan Policy S-15 and S-16.

Thank you for the opportunity to comment on the second draft of the proposed Regional Municipal Planning Strategy revisions. If you have any questions, please contact the undersigned.

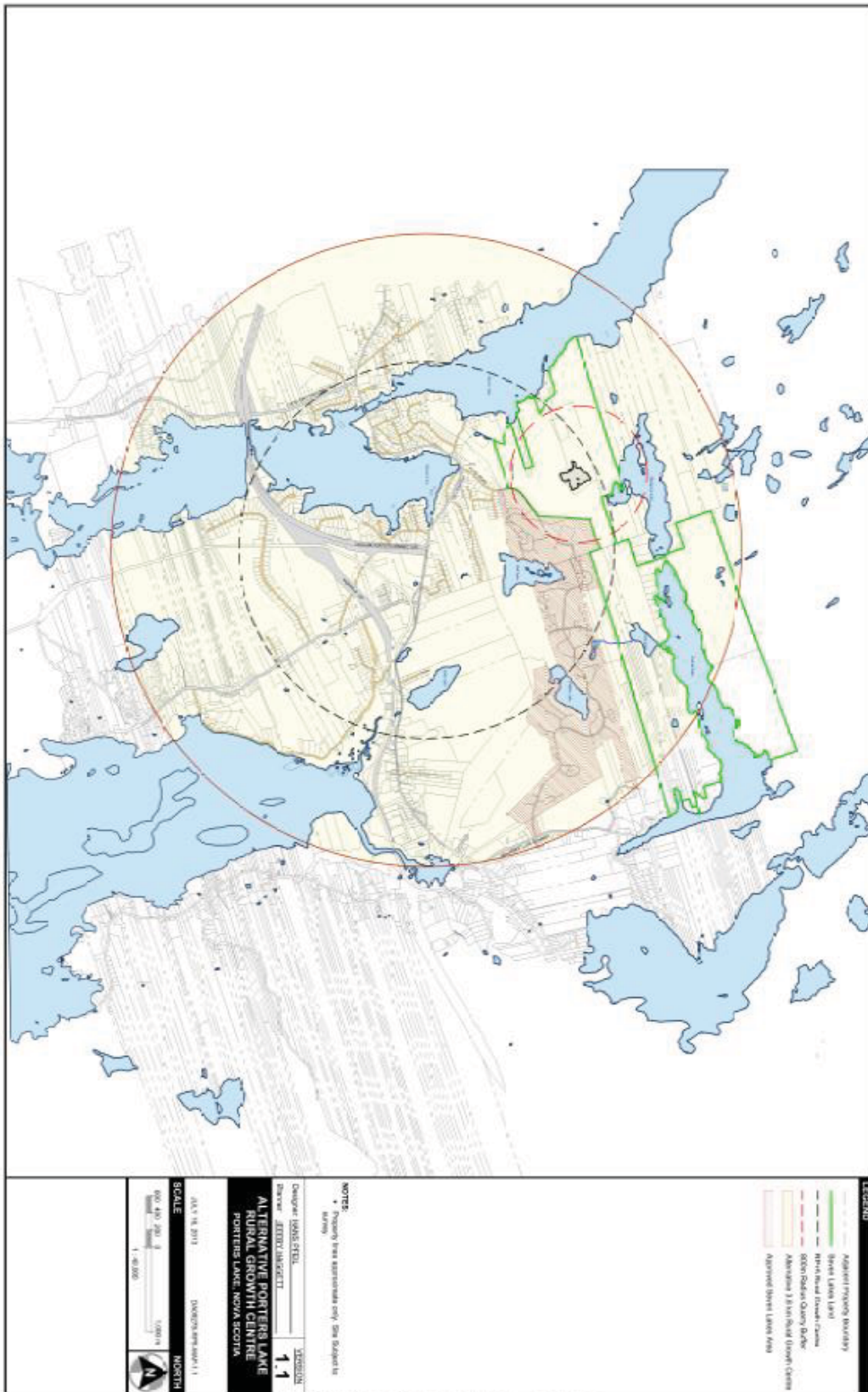
Yours truly,
GENIVAR Inc.

Original Signed

Jeffrey Hagggett, BCD (MUPD)
Project Planner

cc.

Councillor Hendsbee, District 2, Halifax Regional Municipality
Austin French, Manager of Planning, Halifax Regional Municipality
Gail Fowlow, President, Seven Lakes Development Ltd.
Brad Harnett, Project Manager, Seven Lakes Development Ltd
Greg Zwicker, Regional Manager, GENIVAR Atlantic Planning Dartmouth



Reference # 3.74

July 18, 2013

Re: Input on Draft 2 of the Revised Regional Plan

My name is Derek Simon. I live in Dartmouth, in the Hawthorne/Five Corners neighbourhood, with my wife Cheryl and our son Declan. I walk and take the ferry to my job in downtown Halifax. I frequently use the bus and cycle as well.

As a young couple, we chose to live in Dartmouth because of the relative affordability of housing, the access to public transit, and the large number of amenities within walking distance of our home. We feel it is a great place to raise our growing family. I want to see us build a municipality that has sustainable, safe, liveable neighbourhoods, and that is an affordable, accessible and attractive place to live.

I have been actively involved throughout the regional plan review. I have attended a few of the public consultation sessions, and spoken at one. I have read the draft plan and most of the materials produced by the planning office.

The 2006 Regional Plan was a big step forward for the HRM. After decades of urban decline and unsustainable growth patterns, it charted a course for increased growth in the urban core of the HRM, and concentration of growth in suburban and rural growth centres. HRM by Design has furthered this work, and I am happy to see many new developments in the downtown core. I look forward to the further expansion of the Centre Plan, including in Dartmouth.

However, in the first 7 years of the plan, we can also see that we have fallen short of the 25% growth target for the urban core, and that much of the suburban and rural growth is taking place outside of the designated growth centres. As the Stantec report shows, falling short of these targets carries very real financial, environmental and social costs for the municipality and its residents. Further, as the Stantec report also shows, the target of 25% growth in the regional centre is actually too modest: HRM needs to give serious thought to increasing this target to 40% or even 50% over the life of the plan.

Although we have made progress, we need to be doing more to concentrate growth. The regional plan needs real teeth to direct growth. The Centre Plan may address some of the issues in the Regional Centre, but will not address problems of growth outside of the growth centres in suburban and rural areas.

In order to better direct growth, I support the Our HRM Alliance's call for the Regional Plan to include a clearly defined greenbelt, with clearly delineated boundaries on the map, and a clear timeline for implementation. I also support their call to eliminate the wiggle room allowed by Policies SU-15 and G-16.

I am also concerned by the large amount of content that is being moved to secondary plans, without any timeline for implementation, or direction as to what these will contain. The HRM already has literally dozens of secondary plans. In the first 7 years of the Regional Plan, we have seen that these secondary plans are often delayed, resulting in continued development that is inconsistent with the regional plan and the wishes of the community. We do not need more secondary plans. We need a primary plan that is bold and contains real action items. Where secondary plans are necessary, there should be a clear timeline for implementation, and direction as to what they should contain.

In terms of transportation, I think the transit service boundary is a step in the right direction. I think we have focused too much on making transit bigger without necessarily making it better. Over the next few years, we should be focused on service improvements to existing areas, and not further expansion of the system. I fully endorse the comments of the More than Buses group on improvements to the transit system.

I remain concerned that, despite its stated objectives, the plan is prioritizing cars over other forms of transportation. By way of example, while the plan remains very specific about what road projects will be going ahead, it is short on specifics on transit and active transportation projects. I recognize that transit will be addressed in more detail in the 5 year strategic plan for Metro Transit. But I don't understand why detailed road projects aren't removed and left to the road network plan.

I am particularly concerned by Map 8, the road hierarchy. When compared to the 2006 Regional Plan, this map suggests that a number of roads, particularly in Dartmouth and peninsular Halifax, have been or are being reclassified. A number of local streets are becoming collectors, collectors are becoming major collectors, and major collectors are becoming arterials. There is no explanation of these changes in the body of the plan. HRM's own design guidelines suggest that this will mean increased traffic, increased speeds, and that traffic flow will take greater priority compared to the concerns of local residents, including access to their property.

While HRM staff have stated these standards are applied differently with respect to existing streets than new streets, I am unaware of any written plan or policy that states this. I am also unaware of any plan or policy that specifically states that the same priority for traffic does not apply to existing roads. If this is in fact the case, this should be put in writing in the body of the regional plan.

A number of these streets are in residential neighbourhoods, and are not suitable for major traffic. To reclassify a number these streets in order to accommodate more through traffic would seriously undermine the liveability and safety of these neighbourhoods. This is completely inconsistent with the objective of trying to get more people to live in the regional centre. It is inconsistent with the objective of trying to divert more people from cars into other modes of transportation. It is inconsistent with building a safe, liveable, sustainable

municipality. Any road reclassifications should be debated at council with proper public input and scrutiny.

Even if the road reclassification does not affect how the municipality treats traffic on these roads, it is a tacit endorsement of increased traffic flows. This map should either be removed from the plan, or the significance of the changes in classifications should be explained in the body of the regional plan, with a firm written commitment that the reclassification will not affect how municipal staff treat these roads in terms of speed, volume of traffic, and priority of traffic over local concerns.

Thank you for this opportunity to comment. I look forward to seeing the public input reflected in the next draft of the revised Regional Plan.

Regards,

Derek Simon

Reference # 3.75



St. Margaret's Bay Stewardship Association

Submission to the Five-Year Review of the

HRM Regional Plan

July 17, 2013

For the past ten years the St. Margaret's Bay Stewardship Association (SMBSA) has advocated to preserve and protect the natural environment, cultural values, and economic sustainability of St. Margaret's Bay and the surrounding watershed lands.

Since 2008 SMBSA has been an active partner with the HRM Planning Department to develop a specific community vision for commercial and residential development within the Tantallon Crossroads area at the intersection of the Hammonds Plains, St. Margaret's Bay Road, and Hwy. 333.

Our members have been actively engaged in the five-year review of the Regional Plan through participation in the Our HRM Alliance, the Community Design Advisory Committee, and facilitating and participating within stakeholder and public meetings.

Our formal input to the Regional Plan focuses on the following seven areas of greatest concern.

1. Accountability to Community Engagement and Visioning

SMBSA is encouraged that Draft 2 of the Regional Plan makes a commitment to the HRM Community Engagement Strategy as well as vision statements generated by communities. We have been disappointed in the past that the secondary planning process has not entrenched community visions within zoning by-laws in a timely way, and that there has been no avenue to hold HRM accountable. The following recommendations would expand upon the measures described in Chapter 9 on Governance and Implementation.

Recommendations:

- *Improve the Development Agreement Process to make it more objective: weight the evaluation of inputs from various stakeholders including the general public, commercial interests, and HRM staff. This will provide more objective recommendations for Councilors to consider.*
- *Develop a protocol with specific timelines, and a culture of efficiency in the management and implementation of the secondary planning process.*
- *Provide an accountability mechanism for communities to access when decisions become mired within the levels of bureaucracy. This could take the form of a “go-to” person with an ombudsman role when decisions are bogged down or excessively delayed.*

2. Limiting Development between Rural Growth Centres

The SMBSA fully supports the principle in Policy S-11, which states that HRM shall encourage development within the Rural Growth Centres and limit it between them. As the Stantec Report has quantified, by concentrating growth, not only downtown but by extension in the Rural Growth Centres as well, we can save the municipality money and protect the environment. But on the very next page of the draft Plan in Table 3-4 we note that two of the three Conservation Design Approaches proposed are to apply between the Centres. Why, we ask, if development is to be discouraged between the Centres, are you proposing Conservation Design Approaches for areas where development is to be discouraged? In Option 1 multiple developments of up to 100 units are to be allowed. When only 2,500 units are built annually in HRM, multiple 100 unit developments between the Growth Centres invites in great disproportion to the 25-50-25 growth targets the very kind of development which Policy S-11 seeks to avoid.

On a further note, considerable effort has been made over the last five years by the people of St. Margaret’s Bay to clarify definitions and propose reasonable growth patterns for Upper Tantallon and the Crossroads and yet in Map 15B the boundaries of these areas are ill-defined big circles, which extensive development over many years prior to your rough boundary suggestions have already made obsolete. We ask, why has the work of the community not been reflected in the Regional Plan?

Recommendations:

- *Provide mechanisms for Council to enforce Policy S-11 and point up its language so development really is encouraged within the Rural Growth Centres and not between them.*
- *Inspired by the frustration of the people of St. Margaret’s Bay with the lack of action on their visioning process, give serious attention to realizing the goals and objectives of your 2008 Community Engagement Strategy (Policy G-1), namely, with the full participation of communities themselves, the speedy development of Secondary and Community Plans, not only in Tantallon, but throughout HRM’s Rural Designations.*

3. Protecting Urban Reserves

The wording of Policy G-16 is weak. The Urban Reserves established during the 2006 Regional Planning process are compromised.

Recommendation:

- ***Tighten the wording of G-16 to eliminate “wobble room” and limit its application to single, privately held PIDs under 10A which span an Urban Reserve boundary.***

4. Greenbelting, Shorelines and Islands

The concept of greenbelting is described in the Regional Plan as a natural network of open spaces designated for a variety of uses. A fundamental precept of the greenbelting principle is missing. Greenbelting can and should be used to direct growth. The concept is essential to the livability and sustainability of HRM, should be stated in the revised Plan, and must be reinforced and refined in the proposed “Greenbelting and Public Spaces Priorities Plan”. Critical will be whether greenbelting will be a protected public resource that will drive development decisions, or be subject to modification and encroachment due to pressures exerted by vested interests.

Recommendations:

- ***A clear definition of greenbelting must be incorporated into the Regional Plan that acknowledges the critical role of designated areas to direct and control growth.***
- ***A specific timeline should be identified within the Regional Plan for the completion of the “Greenbelting and Public Spaces Priorities Plan”. The SMBSA recommends that the timeline be no greater than two years from the date of the approval of the new Regional Plan.***
- ***Communities and their representative stakeholder organizations must be actively engaged in the development of the Greenbelting and Public Spaces Priorities Plan.***

Greenbelting is not just about protecting mainland woodland resources. Coastlines must also be targeted for protection and acquisition, to preserve our coastal natural resources and provide access by the public for recreational enjoyment. The percentage of coastline along St. Margaret’s Bay that is accessible to the general public is very limited. Given their proximity to the urban core, the public beaches during the summer months can be crowded to the point of discouraging use and creating safety hazards due to inadequate parking.

Recommendation:

- ***HRM take inventory of shoreline properties on St. Margaret’s Bay that are feasible for acquisition, and develop a multi-year plan for purchase.***

Islands are a highly visible cultural, social and environmental resource and deserve special attention. HRM must vigorously pursue the protection of island green spaces, and particularly those with older and old growth forests, marshlands, sensitive plant and wildlife habitats, and historic or cultural sites.

Recommendations:

- ***Section 3.4.4 on Island Development should be revised to communicate a more aggressive statement of intent to limit certain kinds of development and to pursue the public purchase of key islands to preserve cultural and historical heritage, rare and fragile ecosystems, and public access.***

- *In addition to (c) and (d) in Section 3.4.4. SMBSA recommends the addition of: (e) no launching pads, storage depots, parking lots or ferry crossings to service islands are to be allowed off of privately-owned roads without a consensus agreement among road owners.*

5. Water Quality Protection and Riparian Buffers

Draft 2 of the Regional Plan acknowledges the importance of protecting water quality, and this is a vital interest of rural communities where residents have their own wells and septic systems. Although HRM has demonstrated world-class communication regarding the importance of a citizen-based process of recycling, the same cannot be said for public awareness of citizen responsibility for water quality.

Recommendations:

- *HRM has an active role to play in the education of rural residents in the proper installation and maintenance of wells and septic systems. This role can be executed through direct communication with residents and through supporting community organizations to deliver education programs.*
- *Policing and enforcement within areas of HRM jurisdiction must be in evidence during critical stages of residential and commercial development; e.g., siltation impact during new construction and over the long term in growth areas, deforestation boundaries, impact of construction on islands and along shorelines, septic systems installation and monitoring, etc.*

Within the past two months the record breaking flooding in Calgary and Toronto has provided graphic evidence for the need to increase the size of riparian buffers. Extreme weather events are no longer in the realm of future possibility, and climate change will continue to escalate their incidence and range.

Recommendation:

- *Increase riparian buffers to a minimum of 30 meters, and more when scientifically warranted, to provide additional protection for watercourses, as well as the protection of neighbouring roadway infrastructure and properties in the event of flooding.*

6. Support for Cultural Infrastructure in Rural Areas

There is an obvious bias within the Regional Plan that the urban core of HRM is the primary cultural engine that produces value for both residents and visitors. This urban-centric view of culture places the rural areas at a great disadvantage when it comes to development priorities and the allocation of public funding for cultural infrastructure. There is a wealth of cultural attractions and social capital generated in rural areas: historic sites and architecture, working fishing villages, farmers markets, visual and musical artists, outlets for drama and dance, as well as a vast array of volunteer organizations.

Recommendations:

- *The Regional Plan needs to ensure that resources and support for the preservation and enhancement of cultural infrastructure is distributed on an equitable basis throughout HRM.*
- *The significant heritage resources of the coastal corridor of St. Margaret's Bay, a draw for over a half-million tourists annually, must be reflected in Map 10.*

7. Transportation

SMBSA coordinates the Chester to Chebucto Transportation Working Group that has been formed to support information sharing and planning for the development of transportation solutions within the geographic area from Prospect Road to Chester. A detailed submission on Chapter 4 of the Regional Plan on Transportation has been compiled from a discussion held within the Transportation Working Group.

- ***The SMBSA supports the recommendations on transportation contained within the RP+5 submission of the Chester to Chebucto Transportation Working Group.***

Thank you for the opportunity to provide input to the Five Year review for the Regional Plan. If there are any questions concerning this submission, you can contact me at 225-7119 or cathycrouse@eastlink.ca.

Respectfully submitted by:

Cathy Crouse, Chair,

St. Margaret's Bay Stewardship Association

Reference # 3.76

From: Susan Yeadon Smith

Sent: July 14, 2013 3:32:51 PM (UTC-04:00) Atlantic Time (Canada)

To: Regional Planning Office, HRM

Subject: Greenbelting

Re: Draft 2 of the Regional Plan

I am pleased to see that greenbelting is a basic feature of the plan. Connected green areas are very important in several ways to the quality of human life, not to mention wildlife.

Green areas can rarely be added later, once development of fragmentation has occurred. I encourage you to be pro-active in assuring that the greenbelts in the plan are maintained or enlarged.

Thank you for the opportunity to speak.

Susan Yeadon

Reference # 3.77

Recommendations to the RP+5 Review of the HRM Regional Plan

Submitted by the following members of the St. Margaret's Bay Coastal Planning Advisory Committee July 2013:

Michael Murphy	John Leon	Michael Butler
David McGregor	Jeani Mustain	Bill Roberts

General Observations on *Chapter 3: Settlement and Housing*

In reviewing RP+5 under Table 3-2, *Future Characteristics for Growth Centres in Rural Designations*, the present draft almost totally affirms the values propounded by the Tantallon community in its community engagement process. While it is now too late to be effective in salvaging the rural character of Tantallon at the Crossroads, RP+5, if adopted as drafted, will have great benefit if actually applied in other rural growth areas.

General Observations on *Chapter 9: Governance and Implementation*

Visioning and Its Outcome

The experience of Tantallon at the Crossroads points out the limitations of community engagement in the design of its own community. It also demonstrates the disconnect between the language and ideal intent of documents and on-the-ground outcomes which are often contradictory to those ideals. (*Ex: HRM Case 16424*)

During the period between 2008-2012 the St. Margaret's Bay community, under the guidance, co-leadership, and encouragement of HRM Planning and the Councilors for the then Districts One and Three, undertook four Community Forums and participated in an intensive exercise to frame a new set of development rules for Tantallon at the Crossroads, now designated as a rural district growth centre. The intent of the exercise was to establish an alternative to the MU-1 and MU-2 zoning with a secondary plan that would encourage development and maintain the rural village nature of the crossroads while limiting exit sprawl.

Due to delays and a major wrong turn in the process (based on a "site development approval mechanism" recommended and then rejected by HRM Planning), two significant commercial developments were approved that in many respects negated the intent of the community engagement process.

Delays in the process were largely the result of issues related to HRM Planning. (See attached timelines - Annex A). In terms of the two major developments, HRM planners, writing their recommendations resulting from the Development Agreement processes, opted to ignore the community consensus (drafted by their peers) and to approve developments that, due to their commercial nature, would prohibit the establishment of a rural village.

Specific Recommendations

1. **Reform of HRM Internal Review Mechanisms:** The community engagement process described in Chapter 9 must be more timely and responsive. In short, HRM Planning must improve its corporate culture to provide better management in the implementation of secondary planning. This may involve more reliance on community partners where HRM staffing or funding is inadequate. Too many community engagement initiatives are hampered by the HRM Planning’s internal review process where different departments have different agendas and often work at cross purposes. Legalities often surface late in the process or take a “conservative” interpretation that negates prior work.

Ex: HRM Cases 16424, 17362, 16770

Ex: Fall River development issues

See the attached timelines for Case 16424

2. **Reform of the Development Agreement Process:** Make it more objective. We suggest that the competing/consulted interests on any DA—community, developer, counselors, planners, etc—be “weighted” by pre-determined criteria and an objective scoring standard be applied to reach a resolution.

DA consensus between competing interests may be reached more efficiently within a process that approximates contract negotiations in the public sector using a facilitator/arbitrator within a definite time frame. For example, the SMB Coastal Planning Advisory Committee (CPAC) could represent community opinion and be responsible for establishing community values. Consensus decisions reached by the above process could be made public and feedback invited to comment on the outcome. This could take place within a compressed time frame.

Ex: DA’s such as Ingramport (Destiny Developments), WH Fares (St. Margaret’s Square) and Cobalt Properties (Irving’s, Tantallon at the Crossroads)

3. **A Coastal Policy Protocol under Chapter 3 is Required:** Many coastal development issues up to the high water mark may be controlled by HRM bylaws but there are many more complex cases that require various provincial and federal jurisdictions.

While resolution of these matters is complex, we feel there is a **need for a “go-to” person** to problem-solve on “orphaned” decisions between the various levels of bureaucracy. This “go-to person”—perhaps a volunteer chosen by and from the SMB CPAC— would report to our Councillor and the NWCC as a first step. These issues may be encountered in other areas of HRM, possibly necessitating a broader approach.

4. **Policing and enforcement of existing policies:** More is required in terms of on-site monitoring of various development projects at critical stages of progress. For example:
 - a. Frank Georges Island
 - b. Shoreline wall building
 - c. Siltation during foundation excavations
 - d. Remediation of bacterial run off hot spots: Wynachts Cove
 - e. Septic systems education and controls
 - f. Prevention of setback clearcutting in the Coastal Corridor and Drainage Basins
 - g. Signage control at Tantallon Crossroads and Highways 3 and 333

5. **Clearly Stated Fish Farming, Wind Farm and Solar Farm Policies** to prevent complex situations from arising.

6. **Islands Policy 3.4.4:** a more aggressive statement of intent to limit development and the continued public purchase of key islands. In addition to (c) and (d) we suggest the addition of “no launching pads, storage depots, parking lots, or ferry crossings to service islands” should be allowed off of privately-owned roads without a road owner(s)’ consensus.

The protection of island green spaces with older and old growth forests, sensitive habitats, historical or cultural sites, and marshlands should be more rigorously enforced.

7. **Urban Sprawl:** limit commercial development to the rural growth centres and control exit sprawl into the coastal corridor. Vigilance and careful zoning/secondary planning are especially required in the case of new development at exits, such as the proposed #103 Interchange between Exits 5 & 6.

Annex A - Timeline of events for Case 16424

Village Forums and Case 16424

2007	St. Margaret’s Square
April 2008	I. Managing Change Community Response
	Case 01157 Jan 2009 Development Agreement Criteria
May 2009	II. Visioning a Village Community Values Survey
April 2010	III. Vision to Reality Village Plan Six Point Plan
June 2010	Framing MPS Amendments
to Sept 2011	Joint HRM Planning Committee
	Concept Plan Case 16424 (Sept) establishing Three Zones

June 2011	IV. A Management Plan SMB CPAC
June 2011	Public Open House on Case 16424
Sept. 2011	HRM Final draft Western Region CC Planning language, development agreement process, etc
Feb. 2012	Indication that nothing had been done due to internal reorganization
May 2012	Case 16770 Development Agreement Hearing: Presentation to NWCC
June 2012	Assignment of New planner and word of a Sept. deadline
August 2012	Senior Planners reject work to date in part due to the issue of Site Plan approval
Oct. 2012	Senior Planners require new draft: Development Agreement Process Connectivity
Oct. 13/2012	Oceanstone meeting with councillor and organizations to present priorities and request for progress from HRM
Nov. 28/2012	HRM presents New Draft Policy 16424
Dec. 20/2012	HRM Revises Draft 16424
Jan 14/2013	Case 16770: Genivar/Cobalt DA Hearing Submission to North West Com Council
Feb. 11/2013	Approval of Genivar DA by NWCC
Feb/2013	Appeal of Case 16770 DA result to NS Municipal Board
April 5/2013	Ella and Sheila meet with Cobalt
April 11/2013	Publication of Village Plan by Dal Students
April 30/2013	End Appeal through direct negotiations with Cobalt
May 10/2013	Final revisions of Case 16424 back to HRM Planning. Suggested time table is for June NWCC meeting

June 13/2013

Discussions with Markus Garnet. Revisions made once again incorporating subsection designations to make Designations more sacrosanct. Further review required. No chance to have ready before the fall session.

Reference # 3.78

From: Sheila Stevenson

Sent: July 16, 2013 5:03:59 PM (UTC-04:00) Atlantic Time (Canada)

To: Regional Planning Office, HRM

Cc: Adams, Stephen

Subject: HRM RP+ 5

In order for this plan to be of value, please

- be serious about concentrating growth in our suburban and rural growth centres and in our urban core.
- encourage denser, mixed-use, people-centered neighbourhoods
- be true to the targets NOW and for the next 10 years. Don't be seduced by other developments!
- make up for disregarding the targets until now by accepting the Stantec recommended targets of 50% urban, 25% suburban, and 25% rural for the next 10 years.
- ensure that developers pay for service and development costs. We taxpayers have been paying for them for too long.
- define/designate areas of HRM that will be a connected development-free greenbelt
- include the Purcell's Cove/Williams Lake Backlands + other Urban Reserve Lands as part of the greenbelt. (and delete Clause G16)

best regards,

Sheila Stevenson

Reference # 3.79

From: Sheila Stevenson

Sent: July 16, 2013 3:32:48 PM (UTC-04:00) Atlantic Time (Canada)

To: Regional Planning Office, HRM

Cc: Adams, Stephen; Mayor

Subject: Food Security and the Regional Plan

Since the Regional Plan provides the guiding framework for development in HRM, it seems timely and wise to recognize the issue of food security in the revised plan. Other Canadian municipalities are recognizing the responsibility and role they play in supporting food security initiatives at the local level.

The 1996 World Food Summit defined food security as the state in which "all people at all times have access to sufficient, safe, nutritious food to maintain a healthy and active life". I'd also add "produced, procured, and distributed in ways that are environmentally sound."

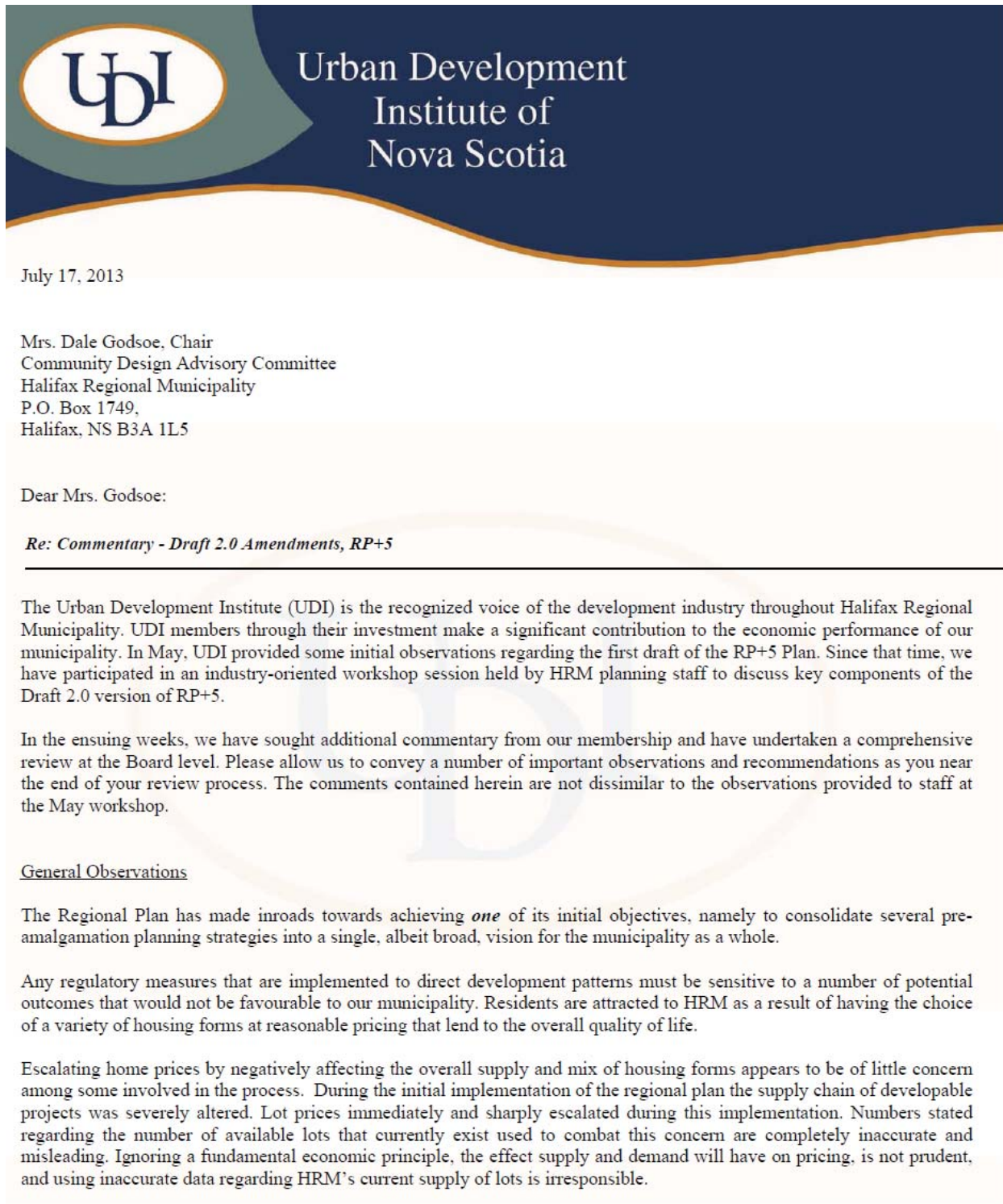
Food security is about community self-sufficiency and well-being. Food security is based on the pillars of food availability (quantity available consistently), food access (possessing the resources to obtain food), and food use (knowing how to cook food in a safe and healthy manner). A planning framework for developing and ensuring food security values food providers, localizes food systems, enables democratic decision making about food, builds knowledge and skills about food procurement, and works with nature instead of fighting against it.

I know I am not alone in wanting my HRM to support the development of a regional food system that supports local growers and producers and ensures community food security. And I am heartened by the fact that Halifax Regional Municipality has taken steps to build local, sustainable food systems by supporting community gardens on municipal land, encouraging the procurement of local food in the catering policy, and supporting the development of the Seaport Farmers' Market. But these actions are not part of a coherent intentional plan with measurable targets.

The Regional Plan presents an opportunity for HRM to make a visionary commitment to strengthen and support community-based initiatives around food security at a regional and local level. Please don't wait another 5 years. We don't have that kind of time.

Best regards,
Sheila Stevenson

Reference # 3.80





It is our position that the planning process in HRM is broken. The number of approval layers in place causes inefficiencies and the inability to turn approvals around in a timely manner. The cause of this we feel lies both in the process and in lack of appropriate staffing or their cooperation in seeking out ways to expedite approvals. Until these are fixed we will continue to see frustration within the development industry and a barrier to achieving the goals of the Regional Plan.

There needs to be a willingness for staff to build in the ability to consider innovative proposals that may not fit into the rules that are currently in place. This may include but should not be limited to altering service boundaries and related designations. An example of this would be the ability to alter service proposals when they are consistent with Halifax Water's Integrated Resource Plan.

That the Regional Plan is only six years old must be taken into consideration before passing judgment on its overall effectiveness to date. Those who believe the Plan has fallen short of its objectives regarding settlement patterns must understand that Plan policy is intended to influence long-term settlement trends – that it is far too early in the plan horizon to suggest major changes aimed at curbing rural and suburban development in favor of increased density in the Regional Centre.

Changes implemented during the initial launch of the Regional Plan have achieved a number of their objectives. Rural development was a direct target in attempting to eliminate this form of development in an effort to redirect more people to the urban core. Almost all current rural development is a result of projects with rights grandfathered prior to the 2006 changes. Not only will HRM have achieved their goal to reduce the amount of development in rural areas, they have created an environment that will ensure over the next 25 years rural development will be nowhere near the 25% share this plan is purporting to cultivate. If HRM is sincere in the mix they hope to achieve the policies surrounding rural development will have to re-visited in the near future.

Suburban development projects have met their goals in a large part due to the ability of the developers to offer exceptional projects. These projects should be applauded for the economic activity they have brought to the city. They are fulfilling a need that consumers, through their buying patterns, have indicated they feel is an important part of our culture. Further regulatory controls that hinder these types of project need to be revisited.

HRM's inability to reach their 25% target for the urban core is due to timing in allowing the initial regulatory changes to take hold, and in the approach being pursued. Forcing others to accept housing forms in the urban core by eliminating the ability to offer viable suburban and rural development is not responsible. HRM has to do more to enable the developers to invest in the centre core through faster approval processes, a more open approach to design and height restrictions, finding solutions to enable development instead of looking to regulatory controls to do so, or in placing burdens on the viability of these projects. More importantly HRM should not rely on planning regulations to force people towards these housing forms. Improvements in cultural and waterfront experiences in combination with improvements surrounding crime rates will result in people choosing to live in the urban core versus HRM forcing this upon them. Developers will also be more likely to invest in the urban core as the demand for these housing forms becomes more popular through these initiatives.



UDI members understand the value of a vibrant downtown core. Our members see this as an important goal and we would encourage HRM to pursue this. UDI endorses RP+5 in terms of the stated intention to adhere to the balanced growth targets of 25% Regional Centre, 50% suburban, and 25% rural areas. Our concerns are in the policies embedded in the RP+5 amendments that appear contrary to truly achieving this mix.

There are encouraging signs that the Regional Centre is attracting new investment, including innovative housing projects and new office/commercial projects. This is bound to continue with improvements to planning and development policies (i.e. HRM by Design); infrastructure investment; and potential tax incentives. The key to success for the downtown is to develop and execute on the “City Centre” strategy without the constant criticism by some of the ongoing success of the suburban areas of HRM. UDI supports the creation of the “City Centre” strategy and is committed to working with HRM and other stakeholders to move this initiative forward.

Stantec Report: Costs & Benefits of Alternative Growth Scenarios

UDI does not support the recently released “Stantec” report outlining potential cost savings resulting from an increase in development in the Regional Centre.

While the report provides important information regarding the benefits associated with the current growth targets, it dissolves into an unrealistic discussion regarding Hypothetical Growth Scenarios “A” & “B”.

HRM staff have stated their intention to stay with current growth targets. Nonetheless, UDI wishes to make the following observations regarding the 40 & 50% scenarios:

- The report correctly points to the critical issue that there is sufficient land for only 804 singles or semis within the Regional Centre. Therefore, if the revised growth targets are to be realized, some 30,000 – 37,000 new apartment units will need to be constructed in the Regional Centre over the life of the Plan. *There is absolutely no market data that supports such an aggressive departure from current settlement trends.*
- The report correctly identifies concerns about the amount of land that will be required to accommodate such an incredible number of units. Assuming an average density of 150 persons per acre for new apartment building in the Regional Centre (roughly three times the density associated with multiple unit buildings outside the urban core), the land requirements for scenarios A and B are 450 and 555 acres respectively. Such land requirements can only be realized through extensive demolition and land assembly. *This will inevitably impact existing neighbourhoods while driving the cost of new rental housing skyward.*
- The report correctly identifies that there is insufficient park and open space to accommodate such a massive increase in housing units. *Who will bear the cost of acquiring and developing community parks and open space in support of these growth targets?*



- The report fails to consider the infrastructure upgrades required to accommodate such a large number of residential units. Halifax Water has already stated its intention to divert future waste water flows away from peninsula Halifax to avoid costly upgrades to existing sewer infrastructure. *Who will bear the costs associated with replacing old and combined waste water infrastructure within the Regional Centre?* Surely, HRM will not look to suburban development to pay for a cost that it has no hand in creating.
- The report fails to explore the consequences of reducing the number of multiple-unit dwellings that will be constructed outside the Regional Centre. Master plan areas like Bedford West are only feasible with a market driven distribution of low, medium, and higher density residential buildings. This holds true for other developments that may fall short of the status of “master plan communities”. *Eliminating or reducing the percentage of multiple unit dwellings outside the core will severely impact project feasibility. This should be viewed as a major threat to the economic vitality of the region as a whole.*

The report unfortunately has resulted in commentary suggesting that some residents of Halifax are a burden to HRM by way of the property taxes they pay. This commentary has the potential to pit certain groups against each other based on the housing forms they have chosen.

Many of HRM’s serviced areas are linear in nature stretching outward along older rural highway corridors for many kilometres from downtown Halifax and Dartmouth. This tends to support the notion that suburban development is tantamount to “sprawl”.

Fortunately, the Regional Plan has identified a number of areas where planned communities will be developed over the next 20-25 years. These developments should not be viewed as undermining efforts to increase housing in the core. Simply stated, not all residents of HRM aspire to live on the peninsula or downtown Dartmouth. They can neither afford it nor desire to raise a family in an apartment building. For many young families, the goal remains to have a home with a backyard and an overall feeling of community living.

Like it or not, peninsula Halifax and downtown Dartmouth must compete for investment dollars without undue influence of Plan policy. As such, Council should not feel rushed to implement sweeping changes aimed at curbing well planned suburban development. To do so will only result in lost investment and reduced economic activity.

RP+5 must embrace “choice” while ensuring sustainable development patterns throughout the municipality. The Stantec report is an unnecessary distraction that takes away from the real issue of reaching the stated 25/50/25 growth targets.



Regional Plan Chapter 1: Introduction

Guiding Principles:

The Regional Plan proposes seven (7) guiding principles. UDI is of the view that an eighth principle should be included. Specifically, *“that the Municipality will strive to ensure that regulations regarding future development do not unduly impact housing affordability throughout the Municipality.”*

It is becoming increasingly apparent that municipal specifications, permit fees, capital cost charges, and other service fees (e.g. deed transfer taxes), are adding thousands of dollars to the price of new homes. This is putting the goal of homeownership out of reach of more and more people. Left unchecked, the impact will be widely felt in terms of reduced development and loss of employment. It will also impact the existing labour force and result in more and more young people leaving the area in search of steady employment elsewhere.

In our opinion, Regional Council and staff must act at all times to create an appropriate balance between service specifications, development charges, and housing affordability. To this end, the importance of affordability should be embedded as a guiding principle of the Plan.

Regional Plan Chapter 2: Environment, Energy and Climate Change

Greenbelting

The term “greenbelting” is proposed for inclusion throughout the Plan. However, it is not entirely clear as to the overall purpose or definition of the term. This will undoubtedly lead to further debate between those who wish to use greenbelting for the purpose of restricting development and HRM planning staff who appear committed to using some form of greenbelting to enhance existing policies regarding “Open Space” preservation.

The Regional Plan places sufficient emphasis of wetland buffers, protection of environmentally sensitive areas, and open space preservation on both public and private lands. Any attempt to embed the term “greenbelting” in the Plan without a clear understanding of the intent will lead to uncertainty and debate amongst community stakeholders. At present, there is a lack of consensus relating to the term and its overall intent.

UDI encourages further dialogue before entrenching this concept in the Regional Plan. UDI does not support Greenbelting if it is intended as a growth control. This is especially true for privately held lands throughout the HRM.

Please be very clear as to intent when applying this concept to privately held property throughout the HRM. Used properly, greenbelting can be an effective tool when managing important natural environments. Used incorrectly, it can have a very harmful impact of the value of private property and housing affordability.



Open Space & Parkland Dedication

On the issue of Open Space, planning and recreation staff must be on the same page relative to park and open space dedications for subdivisions and master plan communities. On the one hand, HRM wishes to see more and more land classified as “Open Space” based on environmental features, topographic constraints, etc. This may include “Riparian Buffers” as set forth in Section 2.3. However, such lands do not necessarily meet the definition of “useable” land per the Regional Subdivision By-Law. If these lands are important enough to protect they should be deemed usable.

UDI is not opposed to seeing appropriate lands designated “Open Space” in the context of an overall master plan or subdivision approval. However, where there is an intention to see such lands preserved for public ownership, the lands must be credited against the developer’s overall parkland requirement. This needs to be clearly articulated in the Regional Plan for implementation in the Subdivision By-Law.

It is also important that such lands be included in the “net density” calculations for rural/open space developments. Section 3.4.1 (footnote 16, Table 3.4) proposes that “net density” exclude riparian buffers, wetlands, slopes in excess of 30% and floodplains from the calculations of lot area. *UDI does not agree with this approach.* There is some rationale for excluding delineated wetlands from the calculations. However, it is not appropriate to eliminate buffer zones and steeper slopes as this can and will have a negative impact on overall project feasibility.

HRM must be transparent in their parkland needs. Section 2.2.4 states that higher density development will require additional parkland to support the needs of local residents, however in the majority cases when developers propose parkland equivalent to ten per cent of the land area of the development, HRM is not interested in taking the land and would prefer cash, stating that there is enough parkland in the area. If this is the case HRM should not be eligible to receive more than five per cent as allowed by the Nova Scotia Municipal Government Act. This practice by HRM amounts to a tax on homeowners, when they are unwilling to take suitable parkland, (indicating that a deficit does not exist), and demand ten per cent of the lot value in cash.

Wetland Protection/Riparian Buffers

Wetlands are already heavily regulated by Nova Scotia Environment, therefore UDI feels that further policy related to wetlands is unnecessary. Also, policy E-15 is too restrictive and conflicts will arise from it (e.g. Highway 113 alignment will pass directly through a wetland that is greater than 2000 m²). A mechanism should be available to allow alterations of wetlands of any size which are currently allowed by Nova Scotia Environment. Wetland alteration restrictions should be based on wetland function not an arbitrary size.

We note that the Plan continues to reflect a 20 meter “riparian” buffer zone. It has been our experience that the 20 meter non-disturbance area is sufficient to ensure adequate tree retention at the land/water’s edge. Where grades are more problematic, both developer and HRM staff have worked together to increase the non-disturbance area. This being the case, there is no need to enlarge the buffer zone or modify related Plan policy.



Regional Plan Chapter 3: Settlement and Housing

General Observations

The Regional Plan has created several important opportunities to increase housing activity within the Regional Centre. As previously stated, it will take time for market conditions to shift if that is indeed the wishes of investors and the end consumer. HRM should not rely solely on legislation to dictate to homeowners the housing form they must choose in order to enable HRM to achieve the goals of the Regional Plan.

As a result of customer preference the suburban areas of HRM will continue to capture the largest percentage of new housing development. The key is to ensure that such development is well rationalized and that greater attention is afforded to properties that represent “infill” vs. “linear” development.

Section 3.2.1 - Urban Settlement Designation

It is proposed in Section 3.2.1, that language relating to three existing master plan communities be eliminated from the Plan. *UDI respectfully suggests that this is not appropriate at this time.* The rationale for removing this language is not apparent. It was our understanding that much deliberation was put into creating this language. As such, the Plan should continue to reference areas as recognized growth areas until they near completion (RP + 10). The danger of eliminating them from the Plan is that policy makers and the general public will lose sight of their importance relative to regional settlement, traffic flows, and overall infrastructure demand.

In 2006 the largest master plan (Bedford West) was approved and although less than 20% has been developed it is being eliminated from the Regional Plan. We feel that this does not show stability, or respect the risk and investment that must be undertaken in fulfilling this plan.

Since the introduction of the original Regional Plan certain events have negatively affected some of the master plan areas. If these areas are still deemed to be important to overall development patterns, HRM has to be mindful of these changes and take measures to mitigate these situations. As an example, the recent return of the Shearwater DND lands resulted in an unfortunate setback for Morris Russell Lake. This negatively impacted the vision of the connector road linking Highway 118 to Caldwell Rd. The Plan has to have flexibility to address situations such as this. Staff also must make the commitment to revisit these setbacks in a more aggressive manner to overcome these shortfalls, otherwise the balance they hope to achieve in suburban development will not eventuate.

Section 3.2.2 - Urban Reserve Designation

Many have taken the position that lands designated “Urban Reserve” are frozen from serviced development for the next 25 years. UDI does not share this position; moreover, we believe the current Implementation Policy IM18 provides sufficient opportunity for Council to consider additional serviced development if conditions are deemed appropriate. This applies to all landholdings under the current Urban Reserve Designation. One only has to look at the serviced



development in the vicinity of Purcell's Cove to see the confusion regarding the Plan's intent.

Draft 2 proposes to eliminate existing language regarding the intent of the Urban Reserve Designation, specifically:

"The Urban Reserve Designation focuses on those lands abutting the Urban Settlement Designation which could be serviced beyond the next 25 years to ensure the Municipality has a long-term supply of serviceable lands. Providing services to these lands may be considered within the 25 year time frame of this Plan subject to Policy IM 18 (emphasis added)."

Eliminating this language is not appropriate, as the context for proceeding with development under proposed Policy G-16 is vague if non-existent.

UDI would prefer that the proposed RP+5 maintain the current language relating to the Urban Reserve Designation as noted above with the exception that reference shall be made to Policy G-16.

UDI is aware that the current Urban Reserve Zone is extraordinarily restrictive to the extent that land, regardless of its size, is restricted to one home per an existing lot. In other words, a property cannot be subdivided to facilitate development with on-site services.

UDI is of the view that the current restriction on development is far too restrictive in light of the fact that there is no guarantee that the seven locations identified as Urban Reserve will ever receive municipal services.

This is especially true given staff's position that the current supply of serviced lots exceeds the requirements of HRM for the next 30 - 40 years.

UDI does not agree with HRM's position regarding the number of available serviced lots.

In the interest of fairness, UDI proposes that at a minimum the Urban Reserve Zone be amended to permit subdivisions and development consistent with Option 2 – the Classic Conservation Design-Shared Services. It is our view that landowners should be allowed some form of development rights should they wish to proceed before full municipal services are confirmed. Otherwise, such lands have no ability to contribute to the overall housing strategy or tax base.

Section 3.2.3 - Rural Settlement Designation

There are currently two types of Open Space Design Development enabled under Policies S-15 and S-16 of the RMPS, commonly referred to the "Hybrid Open Space Design" and "Classic Open Space Design". Since the implementation of these policies in 2006, the majority of Open Space Designs applied for have been that of Hybrid Open Space which resembles traditional development based on well & septic, where each lot has its well and septic contained within the boundaries of the individual lot. The main challenge in the Classic Open Space Design is that the current Dept. of



Environment Rules and Regulations that govern onsite sewage do not allow for a common septic field to be constructed on a separate parcel other than the lot which it serves. To overcome this Classic Open Space Development would need to be done under the bare land condominium rules, which is a newer concept but an option to allow this concept for development to proceed.

In the Hybrid Design, the suitability of the soils to support an onsite sewage system is the determining factor in the lot width and size. Open space is preserved through a number of criteria through the subdivision design process and is preserved on the individual lots with density limited to 1 unit per acre. With the Classic design density is increased to 1 unit per 4000 sq. m. and open space is preserved on the entire parcel through the clustering of homes in a small area.

In the proposed changes in the current RP+5 the goal is control the impact on ground and surface water and encourage growth in the Rural Growth Centers. Current rules for this type of development on a large scale require extensive ground water studies to identify ground water issues and are already being controlled and managed during the process. The method of calculating density should not be changed to the proposed method of excluding Environmentally Sensitive Lands. The current density formula works and recognizes that this density is required to make such projects feasible. Environmentally Sensitive lands are currently protected through the constraints mapping process during subdivision design.

Placing unit restrictions of 30 lots and 100 lots for “between” growth centers are merely random numbers with no background as to how they were derived. Further it should be recommended that a further increase in density should be given to any Open Space Development in the Classic Design form, beyond the 1 unit per 4000 sq. m. as an incentive to move from the Hybrid Design. This would allow for services such as garbage, snow plowing, road maintenance etc. to be paid for through condo fees and not through the general HRM tax base. HRM will still have the ability to collect taxes for the services it provides but will not have any long-term operating and maintenance costs. In Hybrid Open Space design the density is governed by the current regulations for onsite sewage disposal to a maximum of 1 unit per hectare, which generally coincides with the lot yield based on soils found in HRM.

UDI is of the opinion that HRM needs to reopen the dialogue with rural developers. The current policies are not being accepted in the market. Both HRM and the rural developers should work together to create a model that is financially responsible for both HRM and the homeowner, that is sustainable and that is environmentally responsible.

Section 3.6 – Incentive or Bonus Zoning provisions

The incentive or bonus zoning concept provides HRM with an exciting new tool to encourage and improve the economics of certain types of development. Unfortunately, to date no working definition of “affordable housing” has been provided – and the term “affordable housing” is used too loosely by too many people for anyone to know exactly what is meant when it is used.

Initial discussions with HRM staff have indicated that “affordable housing” is based on housing units that participate in a rental buy-down program funded and administered by the Province of Nova Scotia. This provincial program focuses



solely on rental projects and does not deal with condominium “for sale” projects. By tying the program to participation in a provincial program, the municipality is basically giving up control of the bonus zoning incentive concept for “affordable housing” as the province has its own agenda and funding parameters and constraints. The Province must spread their financial resources for “affordable housing” across the entire province and many would say that HRM is already served by a large number of competitively priced apartments.

The bonus zoning concept should also be used to encourage green building initiatives, green building practices, exceptionally energy efficient buildings and in general sustainable development practices. This concept has been discussed with HRM staff by members of the development community on many occasions, but it appears that HRM staff do not have an interest in this concept as it is being completely ignored in the bonus zoning discussion – even prior to the submission for the legislative approval by the Province. Similarly, a density bonus could be used to encourage development of brownfield sites or a number of other types of development which the municipality may find desirable over time.

Regional Plan Chapter 4: Transportation

Section 4.2.5 - The Road Network Priorities Plan

Third Harbour Crossing

Any discussion of a third harbour crossing as a future project to be seriously considered raises a very large number of questions that are beyond the scope of this industry commentary.

Regional Plan Chapter 8: Municipal Services

Section 8.4 - Stormwater Management

Aesthetically, HRM’s stormwater management structures fall short of the possibilities which are being used in other jurisdictions. The mandatory blasted rock sides and tall chain link fence create blights on the landscape. The structures are designed so that they can literally be cleaned out with a bulldozer. Many of these structures rarely see a drop of water in them, but remain ugly forever. Design practices in other jurisdictions create more natural pond, marsh or wetland areas that increase stormwater quality, dramatically improved aesthetics, and create habitat for birds, animals and other aquatic creatures.

The development community is stuck in an inter-jurisdictional black-hole. Halifax Water insists that “stormwater management” is a municipal mandate, and that they will respond to Municipal requirements. In the mean-time, Halifax Water describes itself as being “operations driven” meaning blasted rock and chain link fences rule. HRM has largely abdicated dealing with these structures, deferring to Halifax Water as being empowered to create their own design standards.



The Province and several other environmentally friendly groups have been trying to encourage new development to move toward more modern stormwater management approaches, but neither HRM nor Halifax Water seem to have any true interest in considering doing anything other than the status quo. At the same time, one of the major driving factors in some other mandates that HRM staff are strenuously pursuing is aesthetics. HRM through their design guidelines should move these structures to the top of the 'offensive aesthetics' list.

Section 8.6 - Utilities

Please note: UDI understands that HRM staff has modified its position on total underground wiring for new subdivisions. It is our understanding that HRM will mandate underground wiring for secondary services only. If this is in fact the case UDI would encourage HRM to have meaningful discussions with industry to determine where and how this would be applied. It is not necessary and in some situations financially irresponsible to mandate this in every situation. However, until such time as the Regional Plan is revised, the following commentary remains the position of industry.

One of the most significant threats to housing affordability is the mandating of underground wiring as proposed by Policy SU-25. Despite overwhelming evidence of high installation costs coupled with the lack of a “common trench” design, HRM staff still believe that underground wiring should be mandated in all new subdivisions.

Under the simplest of applications (i.e. a small cul-de-sac or local street with single family dwellings), the cost of total underground wiring is anticipated to be \$8,000 – \$12,000 per household. This is dependent on a “common trench” where part of the cost is absorbed by Heritage Gas. Such costs may be acceptable when dealing with executive-style, million dollar homes. However, it is cost prohibitive for the majority of new homebuyers throughout HRM.

The cost of underground wiring is greatly increased if the developer is required to bury the “three-phase” component of the power transmission supply. In large subdivisions, developers are required to install larger transmission lines capable of providing power to several residential streets along with institutional, apartment, and commercial properties. This is commonly referred to as “three-phase” power. Such lines normally follow collector roads and provide power to local streets.

Requiring such lines to be buried will add \$20,000 – \$25,000 to the cost of a normal single-family dwelling. *This is not the way to encourage housing opportunities for the majority of potential homebuyers in HRM.* Some HRM staff have shown a total disregard for the impact of these incremental costs to the homeowner.

UDI has opposed total underground wiring for several years. On every occasion that the matter has been raised by HRM staff, the same questions and concerns are brought forward without satisfactory responses, namely:



- *Does HRM have a standard design specification agreed to by all utilities, including Heritage Gas?* To date, industry has not seen an agreed-to specification for a common utility trench. As such, we do not understand how HRM can mandate underground wiring via the Regional Subdivision By-Law.
- *Have the various utilities agreed to a common trench design?* To the best of our knowledge, there is no consensus amongst the utilities regarding a common trench policy. How then can HRM mandate underground wiring if the utilities have yet to reach agreement on this vitally important item?
- *In new subdivisions, the number of power outages resulting from fallen trees on overhead wires is virtually nil.* This is because new subdivisions are required to observe a tree-planting protocol that avoids such problems in the future.
- *The loss of existing trees will occur with underground wiring as utilities still require adequate separation from tree roots.* In fact, there is a greater chance of having no street trees within either the street right-of-way or the front yard of a new house if total underground is mandated. With overhead wiring, trees can be planted in a manner that does not interfere with power and communication lines. The same cannot be said of underground wires and separation from tree roots.
- *HRM believes that underground wiring improves overall aesthetics; furthermore, that the value of homes will increase.* There is no question that underground wiring improves aesthetics. However, when underground wiring increases new home prices by \$20,000 - \$25,000 per household, the benefits are clearly outweighed by the reality that fewer and fewer people can afford a new home.
- *Increasing the value of a home also increases the amount of taxes paid to the HRM.* This being the case, perhaps the HRM should pay the incremental difference in cost and apply it to the overall tax base. The investment can be paid for over time – the long term profits fall solely to HRM.

UDI has seen dramatic increases in costs stemming from new design specifications, increased permit fees, capital cost charges, and other service related fees (i.e. deed transfer tax). All of these charges are subject to HST – the end result being a significant increase in the cost of new home ownership.

Frankly, what goes on in other jurisdictions relative to underground wiring should have no bearing on housing and development regulations in HRM. This is not a matter of public safety as defined by the National Building Code. It is not a matter of function or reliability, otherwise HRM should be mandating underground wiring in older areas of HRM.

By all accounts, this is a matter of aesthetics aimed at increasing the overall tax base. Unfortunately, the damage that will result from such a subjective approach to municipal regulation will be significant and long-lasting. Now is not the time to gamble with an industry that employs thousands of people many of whom are young people easily persuaded to seek employment elsewhere.



Section 8.6.3 - Private Wells

If it is the intention of HRM to require hydrogeological assessments for lots serviced with well water, a prescriptive specification should be prepared for developers to follow.

Summary

The first five years of the Regional Plan have met the mandate in terms of consolidating several pre-amalgamation planning strategies into a single vision for HRM as a whole.

In order to remain competitive in attracting a broader demographic of people to HRM many different development forms need to be available. Affordability and choice need to be paramount if we are to attract as many new people as possible. It is our view that the urban core has experienced renewed investor confidence. HRM should not be relying solely on legislation surrounding development to achieve a goal that requires a much more comprehensive plan. Residents need to be 'enticed', not forced to live downtown, by making the downtown environment as exciting as possible.

There are several provisions within RP+5 that will increase the cost of new development, thereby putting the cost of new homeownership further out of reach. This is not acceptable for an industry that generates millions of dollars in economic activity while employing thousands of trades people and other professionals. A fundamental tenant of the Regional Plan must be "affordability" – to this end, all new policies and related By-Law provisions should be weighed against the impact to homeownership and choice.

We hope that our comments and suggestions will be of assistance to the committee. We are more than happy to meet with you to discuss our point of view and/or consider other opportunities aimed at creating a vibrant and stable community for all to enjoy.

Yours truly,

Sent electronically

Ben Young
President
UDI of Nova Scotia

Cc: *The Honourable Mike Savage, Mayor, Halifax Regional Municipality*
Richard Butts, CAO, Halifax Regional Municipality
Brad Anguish, Director of Community & Recreation Services, Halifax Regional Municipality
Jane Fraser, Director of Planning & Infrastructure, Halifax Regional Municipality
Austin French, Manager Community Planning, Halifax Regional Municipality
All Councillors, Halifax Regional Municipality

Reference # 3.81

From: P W

Sent: July 17, 2013 9:39:31 PM (UTC-04:00) Atlantic Time (Canada)

To: Corser, Susan; Tota, Kasia; Regional Planning Office, HRM; Mayor

Cc: Outhit, Tim; kelly@kellyregan.ca

Subject: Action Call from Bedford Waterfront Society

Dear Mayor & Community Development advisory Council,

I am writing to provide input for the proposed Regional Plan (RP+5) document and in particular to let you know that Save Bedford's Waterfront society is very concerned that RP+5 heavily favors the interests of the developers, rather than protecting the best interests of HRM taxpayers & preservation of our urban wilderness areas, coastal waterways and harbour areas. As a member of the larger "Our HRM Alliance" group, the "Save Bedford's Waterfront Society" shares concerns expressed by our allies that the revised HRM Regional Plan does not adequately tackle crucial issues such as sprawl, affordable housing, transportation & green-belting, preservation of the environment & proper water buffer zones.

The RP+5 offers a few encouraging commitments towards keep Nova Scotia's coastal areas & freshwater ecosystems healthy and productive. These include the proposed water supply protection zone, and stricter restrictions around clearing vegetation around watercourses in riparian buffer zones. However, despite this, RP+5 proposes changes that will further weaken existing water and coastal policies and by-laws and have grave consequences on water quality.

While we support a renewed commitment to riparian buffer zones around all water bodies (**Section 2.3.3, Policy E-16**) we still feel strongly that a **30 metre buffer zone should be considered around all fresh water bodies, and wider setbacks of 60 to 100 metres for exposed or eroding coastal areas. We also support restrictions on vegetation removal from riparian buffer zones (Section 2.3.3 Policy E-16).**

Save Bedford's waterfront is very concerned with the following as it directly affects our community, environment and our waterfront:

Halifax Harbour (Section 2.3.3, Policy E-17). **Within the current plan, Halifax Harbour is exempt from watercourse buffer requirements/ Halifax Harbour is a large, complex, and diverse part of HRM.** How can this be? Within the current Harbour Zone are residential, commercial or natural areas that non-industrial and do not host marine dependent activities. This includes, but is not limited to, areas such as **Bedford Waterfront**, North West Arm, Mill Cove, Cow Bay and Eastern Passage, the former DND lands. **Watercourse buffers and setbacks should be required in these areas just as they are around other HRM watercourses!**

For those of you that may still be under the assumption that there is no natural pre-existing shoreline left on the Western Shore of Bedford basin, that assumption is wrong. There is and it needs protection.

Development Agreements and as-of-right development (Section 2.3.3 E-18). Under RP5, Riparian agreements. **buffers are not required for as-of-right development, and need only be considered for development**

We believe riparian buffers should be required **for all developments** adjacent to a watercourse.

Grandfathering riparian buffer requirements (**Section 2.3.3, Policy E-19**). The proposed changes to RP-5 calls for relaxing riparian by-law requirements on lots in existence before this plan came into effect in 2006. Save Bedford Waterfront Society thinks there should be absolutely no relaxation of buffer requirements, particularly on lots that are not suitable for development such on floodplains, or low lying coastal areas!

Many aspects of the plan need more consideration and certainly more community input:

- a) Growth strategy
- b) Greenbelting
- c) Transportation
- d) Community engagement
- e) Water buffer zones

We believe that these sections of the Plan cannot be dealt with internally by the Halifax Regional Municipality (HRM) administration. They are to do with the very nature of HRM and how it reflects community values, not technical issues. It is not reasonable to wait for the public hearing, and expect informed community discussion and creative debate to inform council's decision in the fall.

Clause G-16 is an overt loophole designed to be exploited by developers and removes protection for our Urban Reserve lands. **Clause G16 must be deleted.**

The Stantec Consulting report, provided to HRM Council, recommended **a growth target of 50% urban, 25% suburban and 25% rural**, in order to save the city \$3 billion over 18 years. Council should act in the best interests HRM taxpayers, heed this advice, and incorporate this as an **accountable** target in the RP+5. **The 25% urban, 50% suburban and 25% rural development target must be deleted.**

The concept of "greenbelting" should be clearly defined in RP+5 and specific areas of HRM should be protected from development under this designation.

Please let it be documented that we are very dissatisfied with the proposed Regional plan as it stands now, and are opposed to it. Please listen to the people and community groups in your city and make the positive changes. We have copied our councilor & our MLA on this as well.

Patrick Ward

Reference # 3.82

From: Marjorie Willison

Sent: July 16, 2013 6:38:40 PM (UTC-04:00) Atlantic Time (Canada)

To: Regional Planning Office, HRM

Cc: Adams, Stephen

Subject: Put Local Food System in the Regional Plan

I commend council on food-related actions to date, such as the invitation for people to develop community gardens on HRM-owned land. The Seaport Farmers Market is another asset in our city that nudges us towards a local food system.

Given the urban - rural 'divide' that seems to plague us, I would suggest that a regional food system to support farmers and fishers, and enable residents to more readily access local foods in season, would help to heal the rural - urban 'divide', and move HRM towards a locally-based food system.

Adding the development of a regional food system to the Regional Plan +5 makes a lot of sense at this time.

Regards,

Marjorie Willison

Reference # 3.83

From: David Woodhall

Sent: July 16, 2013 7:44:32 AM (UTC-04:00) Atlantic Time (Canada)

To: Regional Planning Office, HRM

Cc: Catherine McKinnon; Adams, Stephen

Subject: HRM Regional Planning Strategy +5

Dear Sir/Madam,

I am writing to provide input for the proposed Regional Plan (RP+5) document and, in particular, to raise my concerns that RP+5 heavily favors the interests of developers, rather than protecting the best interests of HRM taxpayers and preserving our urban wilderness areas (such as the Purcell's Cove/Williams Lake Backlands).

Specifically:

1) Clause G-16 is an overt loophole designed to be exploited by developers and removes protection for our Urban Reserve lands. **Clause G16 must be deleted.**

2) The Stantec Consulting report, provided to HRM Council, recommended **a growth target of 50% urban, 25% suburban and 25% rural**, in order to save the city \$3 billion over 18 years. Council should act in the best interests HRM taxpayers, heed this advice, and incorporate this as an **accountable** target in the RP+5. **The 25% urban, 50% suburban and 25% rural development target must be deleted.**

3) **The concept of "greenbelting" should be clearly defined in RP+5 and specific areas of HRM should be protected from development under this designation.** In particular, the Purcell's Cove/Williams Lake Backlands should be a protected corridor, designated as a greenbelt area, that should be completely off-limits to development.

Sincerely,

David Woodhall