



RP+5
Regional Plan 5 Year Review

RP+5 DRAFT 3

PUBLIC WRITTEN SUBMISSIONS II

received from June 26 – July 5, 2013

HALIFAX
REGIONAL MUNICIPALITY



28 June 2013

Austin French
HRM Planning Manager
Eastern Region Office - Alderney Gate
40 Alderney Drive
Dartmouth, NS
B2Y 2N5

Re: RP+5 Sandy Lake development rights, PIDs 00423772, 41127739, 00421982, & 00646000

Dear Austin:

Armco Capital would like to request that the Sandy Lake lands (PIDs 00423772, 41127739, 00421982, & 00646000) be explicitly recognized in the Regional Municipal Planning Strategy as being appropriate for development.

As part of the RP+5 review of the RMPS we request that policy be inserted that acknowledges the Sandy Lake lands as being appropriate for development. The RMPS should clearly facilitate and direct the preparations of amendments to the Secondary Planning Strategies that apply to these lands. The Secondary Planning Strategies should be amended to have policy and accompanying LUB provisions which enable development through Comprehensive Development Districts. Recognizing that wastewater servicing is required, detailed development approvals can be tied to the extension of wastewater services.

We appreciate your attention to this matter.

Sincerely,

ARMCO CAPITAL INC.

Original Signed

Chris Millier
Vice President, Community Development

Dear Regional Planning Team,

I am writing to express my concern of the change in designation of Hawthorne Street to a collector street. I do not live on the street but I do live in the neighbourhood and I see no reason to change its designation. There alternate routes namely Pleasant and Portland Streets that one can use as collectors. Further, there would be significant safety concerns with increased traffic and speed of traffic on Hawthorne. The street passes by Hawthorne School and park with many children nearby. The location of the school, which is close to street provides little buffer between the street and the front of the building--this is a very busy spot during the school drop off and pick up times. We who live the downtown neighborhoods of Old Dartmouth--value our communities as a wonderful place to live and raise our families--Hawthorne Street is a very important part of this community and it is much more than a collector route. Again I strongly urge that it remain a street for local use and support traffic calming measures be taken to further slow traffic along the street.

Ross Armstrong
Dartmouth NS

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 changes 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,

Helen Browne

Hawthorne Street Resident

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.

Also, 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. Additionally, over the years street widening has resulted in many homes being directly on the sidewalks, the children play close to the street creating an additional safety concern, exacerbated if the street is deemed Collector.

Another critical concern is speed control: I live on the very sharp curve on Hawthorne Street. Over the years I have lived here, there have been 2 telephone pole replacements, 4 destroyed cars, and 7 vehicular visitors up on my front lawn, solely from excessive speed. There are straight stretches in both direction to this sharp curve, commonly resulting in high speeds and cutting the corner, and with any inattention from drivers, off the road they go. One vehicle even flipped over 3 years ago. If there had been any children or adults on the sidewalk at these times, there would have been dire consequences. It is important to implement traffic calming, but at the least to not permit even greater speeds on the street.

It seems unfair that as HRM continues to develop suburban areas, it is the urban areas that more and more take their traffic volumes. To do so, HRM continuously converts urban Local streets to Collector streets, as you are attempting to do here. I'm sure you would be concerned if they were doing this to your street.

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,

Doug Caldwell

Hawthorne Street

Attached are our comments on Potable Water Section in Chapter 2. As well we attached a pdf of the water supply areas.

Please let me know if you have any questions.

Kenda MacKenzie, P.Eng.

Manager of Engineering Approvals

Halifax Water

On behalf of the Dalhousie Student Union and all the Dalhousie students we represent I would like to request that the HRM consider some of the issues that students campaigned on in the municipal election last fall. Attached is the brief version of the platform. Students would like the opportunity to give further input into the plan. Until then this document should be taken seriously considering the popularity of some of these ideas on campus and in the community during and since the campaign.

I look forward to working on hearing more about the plan moving forward.

Thanks

Aaron

Vote Student Issues in

HFX Elections Oct 6HFX Elections Oct 6HFX Elections Oct 6HFX Elections Oct 6HFX Elections Oct 6HFX Elections Oct 6HFX Elections Oct 6HFX Elections Oct 6HFX Elections Oct 6HFX Elections Oct 6HFX Elections Oct 6HFX Elections Oct 6HFX Elections Oct 6HFX Elections Oct 6HFX Elections Oct 6HFX Elections Oct 6HFX Elections Oct 6HFX Elections Oct 6th -20 th

We are 30,000 students in Halifax.

Let’s act together and have our voices heard!

Together we can imagine a youthful city with...

Visionary Transit

IMAGINE!

1. Shifting investment from a car-focused infrastructure to active and public transportation.
 2. A late night public transit system
-

3. Extending bus routes past the urban center

4. Extending the U-pass into the summer months.

5. The proposed Cross-town connector

Did you know? -New road construction and road widening projects could be used to improve active transit.

-Highway 102/Bayers Road (\$292 million - \$1,000,000).

-Widening Herring Cove Road (\$2.5 million).

-Bedford West over-sizing (\$3 million).

Culture

IMAGINE!

1. Increasing HRM arts funding to meet the national average of \$5.35 per capita.

-Currently HRM spends only \$0.55 per capita on the arts

2. Restructuring funding for key civic sector groups.

-Currently HRM only give this funding through event-specific funding.

Did you know? - 3,200 international students are attending universities in HRM.

Public Space

IMAGINE!

1. Transforming Argyle St. and University Avenue into pedestrian zones.

2. Monthly “open street” events during the spring, summer, and fall.

3. Supporting the development of a greenbelt.

Did you know? -HRM is developing 394 acres near Williams destroying a very large area of natural landscape.

-709,000 trees in Urban HRM contribute \$44.2 million dollars through energy conservation, CO2 reduction, air quality improvements, storm-water control, and property increase.

Liveable Communities

IMAGINE!

1. Putting forth a formal request to the provincial government to improve tenants' rights
2. Supporting zoning for student co-ops
3. Focusing on density in the Halifax peninsula rather than supporting sprawl
4. Taking inclusion, diversity, gentrification, and social justice into account when making council decisions.

Did you know? -Low-density suburban areas cost HRM more than twice as much as High density urban areas.

-A new office building has not been built in downtown in 22 years and 96% of new office space in the last four years has been built in the suburbs.

Register for the voters list, October 15th at the Dal SUB

Dear Councillor ...

Please find attached a letter to the Regional Plan 5 Year Review Committee concerning the protection of the Lake Echo Watershed. In light of the recent watershed study, concerned residents of Lake Echo have formed the Lake Echo Watershed Association to protect and improve the quality of our lake. We have met with the Sackville River Association, and are working to develop a plan that will allow us to enjoy sustainable development in the area without negatively impacting the ecosystems that make up our watershed.

As you will see in the attached letter, we have noted that protection has been provided in the plan for the area directly adjacent to the waters of Lake Echo. All we are asking is that this protection be extended to the complete watershed of Lake Echo, until such time as we can implement measures that will improve conditions in the lake and watershed, and restore enough assimilative capacity in the receiving waters to accommodate additional development. We believe we can do this through a program of public awareness and education, and working with stakeholders in the area to resolve issues that are currently impacting the quality of the lake.

We would appreciate your consideration of this revision to the plan.

If you would like to meet with members of our association to discuss our concerns, please feel free to contact us either by responding to this E-mail, or by contacting us through one of the numbers on our letter head.

Sincerely

Dan Regan

Lake Echo Watershed Association



L.E.W.A
Lake Echo Watershed Association

47 Country Lake Drive, • Lake Echo, Nova Scotia CANADA • (902) 829-2598 • Fax (902) 829-3335

June 26, 2013

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

Attention: HRM Staff/Regional Plan 5 Year Review Committee

Reference: Regional Plan 5 Year Review

Subject: Lake Echo Watershed Protection

Members of the Lake Echo Watershed Association attended the town hall meeting on Monday, June 17th due to our concern that there appeared to be errors in the representation of the Lake Echo Watershed in map 15D. During follow up discussions with HRM staff member Maureen Ryan, we became aware that Maureen had been given the incorrect impression, if not the guidance, that the development of properties at the head of the lake would have little or no impact on the water quality downstream of a proposed development. This is the direct opposite of the actual findings of the Lake Echo Watershed Study. After reviewing some of the facts presented in the recent Lake Echo watershed study, Maureen suggested that we submit a request to the committee to revisit the issue in light of those facts.

Map 15 D from the HRM 5 year review draft presentation (attached - Figure 1) and section 3.4 (Settlement and Housing) of the Draft RMPS incorrectly indicates that the critical watershed immediately adjacent the lake is the **only** property where development should be severely restricted due to poor water quality. Map 5.2.4 from the Lake Echo Watershed study (attached - Figure 2) illustrates that the area included in the study at the head (North) end of the lake is included in the highlighted area with "no assimilative capacity for additional development". The executive summary of the watershed study states:

- "To allow additional development in any of the areas tributary to the water bodies with no assimilative capacity requires implementing measures to reduce current pollutant loads to these water bodies in an amount at least equivalent to:
- The existing loads in excess of the amount required to meet water quality objectives set by current guidelines for the objective water uses established through the survey; plus
 - Pollutant loads expected from additional development in the watersheds tributary to each waterbody.

The consultant who carried out the watershed study was directed to review the proposed case 01278 to determine the impact of the development on the watershed. Staff appear to have incorrectly interpreted the

review to indicate that if case 01278 were to proceed it would have little or no impact on the watershed. This was a critical error with potentially disastrous impact. The study actually indicates that Lake Echo, while salvageable, is at a tipping point where corrective action must be taken. The development in question has the potential to negatively change the trophic status of Jack Weeks Lake and Lewis Lake, and could reduce the pH in those lakes and the receiving waters of Lake Echo. The study specifically states that "Plans for the proposed development must include the following:

Reduction of existing pollutant loads to adjacent water bodies to make assimilative capacity available to offset any additional loads that will be generated by the proposed development.

Restricting development in selected areas of the watershed suggests that the non-restricted areas should not receive the same protection, when the recent watershed study indicates they are at least as vulnerable, if not more vulnerable, and in need of protection.

The Lake Echo Watershed Association respectfully requests that the protection offered to selected areas of the lake be extended to the complete watershed as per the recommendations of the HRM commissioned Lake Echo watershed study, until such time as we are able to demonstrate that the watershed is well on the way to recovery and possesses the required assimilative capacity to allow sustainable development.

We believe that our plan of a community run program aggressively focused on increased awareness, education, sampling and stewardship, will result in improvements in the watershed that will ensure that the community can grow and enjoy the benefits of our beautiful lake for generations to come. If successful, we envision the elimination of restrictions on sustainable development in our watershed at the next HRM 5 year review.

Thank-you for considering our request and helping us protect and preserve our delicate watershed.

Regards,

Randy Price
Director,
Lake Echo Watershed Association

Figure 1 – Regional Plan 5 Year Review Map 15D- Lake Echo Rural Growth Centre

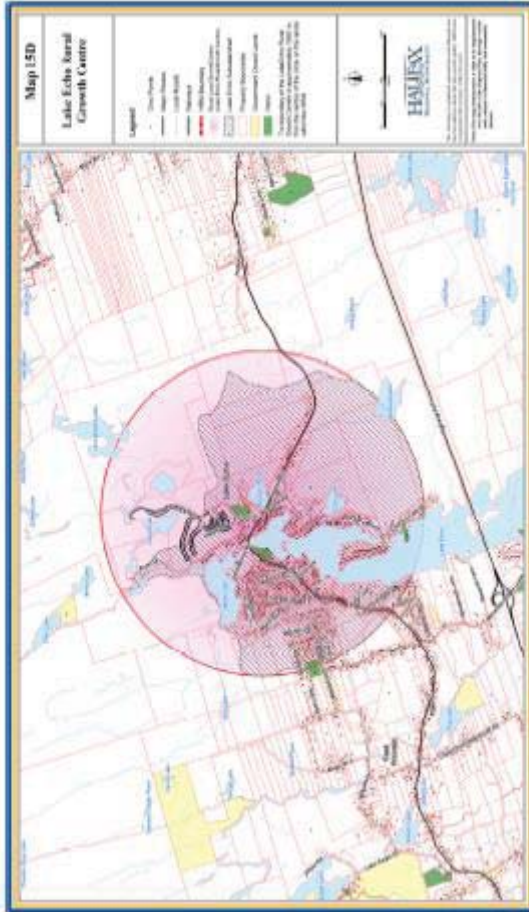
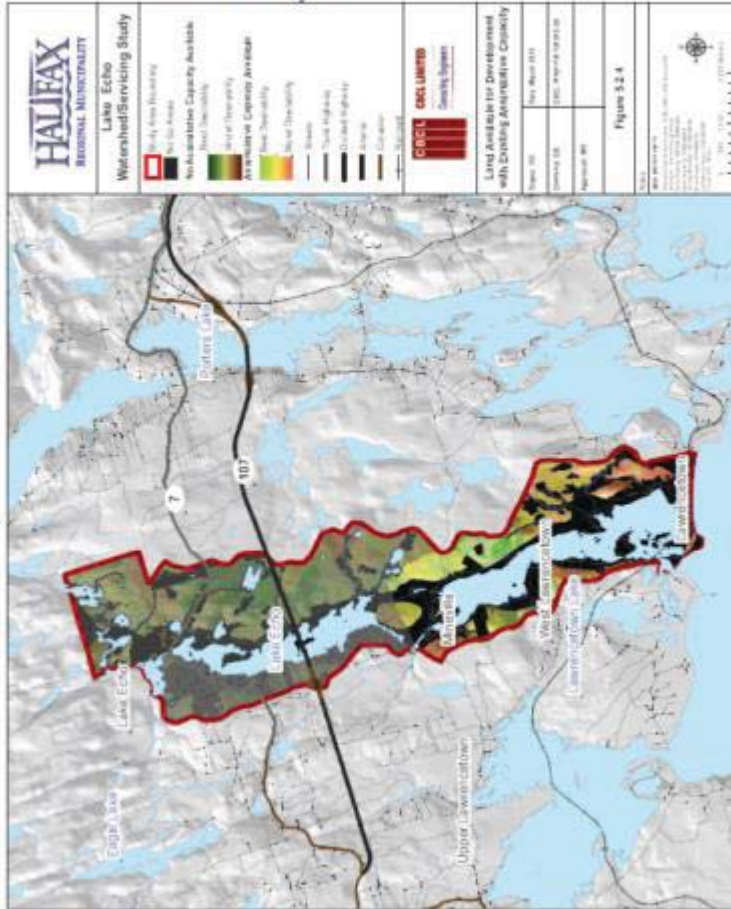


Figure 2 – Map 5.2.4 – Lake Echo Watershed Study – Assimilative Capacity of Receiving Waters
CBCL Limited, May 2012





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Dartmouth, NS B3B 1Y2
Tel: (902) 466-2003
Fax: (902) 466-2140

www.heritagegas.com

**Call Before You Dig
1-866-313-3030**

June 28, 2013

Halifax Regional Municipality
Regional Planning Office
2nd Floor – 40 Alderney Drive
P.O. Box 1749, Halifax, NS
B3J 3A5

Re: Regional Plan 5 Year Review (RP+5)

To Plan HRM,

Heritage Gas Limited ("Heritage Gas") has an important role to play in contributing to the creation of a sustainable and prosperous Regional Centre that will spur economic and environmental benefits across the entire Halifax Regional Municipality ("HRM").

As the Regional Plan Vision Statement indicates, the goal is to *maintain and enhance our quality of life by fostering the growth of healthy and vibrant communities, a strong and diverse economy, and sustainable environment.*

The economic and environmental benefits of natural gas contribute to HRM's objective of being competitive and sustainable. Access to natural gas contributes to the high quality development of communities and attracts businesses to the Regional Centre. Successful businesses and lively communities lead to a more vibrant, sustainable, high quality and complete Regional Centre; one that fosters growth, change, and improvement.

Since its inception in 2003, Heritage Gas has made it possible for its customers to save between 20% and 70% on their fuel bills compared to Nova Scotians using oil, propane or electricity. In 2012 alone, Heritage Gas customers cumulatively saved \$77 million in energy costs.

Despite volatility in the cost of all fuels, the natural gas price advantage over alternative fuels is expected to continue. Oil and solid fuels are likely to face increased costs due to world market price volatility and the associated higher costs of their larger carbon footprints.

Through strong cooperation between Heritage Gas and HRM, more residents and businesses can gain access to natural gas. In support of HRM's Regional Plan themes, increased access to natural gas can contribute to a more sustainable, vibrant, livable, mobile and prosperous community.

Natural gas' many advantages are:

1. A low-cost fuel source;
2. The most environmentally-friendly of all fossil fuels - reduces contaminants like sulphur and carbon dioxide; and

3. Widespread availability in HRM.

Making natural gas an integral part of community design standards will contribute to the beautification of HRM's communities through the elimination of propane and oil tanks. Including such design features into new communities will contribute to a lively collection of shops, stores, offices, restaurants.

With the price of natural gas forecast to remain competitive for the foreseeable future, the use of natural gas as a transportation fuel has been garnering well-deserved attention. One way to take advantage of this low-cost commodity is to utilize compressed natural gas for vehicles ("NGV") – namely large, return-to-base transit fleets such as Metro Transit buses and refuse collection fleets.

HRM is prospering from economic and environmental benefits and savings of converting its own buildings to natural gas (see Attachments 1 and 2 for savings realized by HRM to date). As of June 2013, cumulative economic savings by converting 25 HRM buildings from oil to natural gas were over \$6.5 million while environmental savings were over 16,000 tonnes of GHG emissions. There is potential for more savings by converting other HRM facilities.

Present Challenges and Opportunities for HRM

There are a number of challenges and opportunities for the growth of the natural gas distribution network within the region. With resolution and advancements in these areas, we can increase the ability of HRM to capitalize on the benefits of having natural gas available to more consumers and having more customers using natural gas as their preferred energy option.

The following is a summary of a number of issues and opportunities that have been discussed with HRM:

- Permitting Process
- Construction Costs
- HRM Development
- HRM by Design
- Natural Gas for Vehicles
- Natural Gas for HRM Properties

Permitting Process

HRM and Heritage Gas have streamlined the Streets and Services permit application process over the past 10 years to be more efficient for both organizations. Heritage Gas continues to advocate for a predictable and cost-effective permit application process. The number of required permits increases each year and will approach over 1,000, annually, in the near future:

- The HRM Right-of-Way Services department has encountered recent difficulties of maintaining staffing levels to accommodate the volume of permit applications. Heritage Gas would suggest that the staffing levels should match the desired service levels to ensure responses within one week of application to ensure the most efficient timeline to providing customers natural gas service.

HRM by Design was first encountered by Heritage Gas by HRM in the fall of 2009 when Heritage Gas attempted to obtain a permit for a service line to 1717 Barrington Street. The new design requirements stated that the natural gas meter cannot be placed on the front of a building without constructing an alcove for the meter. These requirements were provided to the building owner and, in large part due to the delay, uncertainty and cost caused by the new process, the project did not proceed. Under HRM by Design, the building owner must apply for a development permit for any building envelope modifications that includes architectural drawings of an enclosed alcove. This process significantly increases the cost of converting to natural gas and has discouraged customers from proceeding to convert. Heritage Gas has made a significant capital outlay on infrastructure in the area covered by this policy, and is now limited in its ability to serve potential customers. This leaves the potential customer burning a dirtier, higher-cost fuel which has a negative impact on the area covered by HRM by Design in terms of air quality, competitiveness and aesthetics.

Since that time, only a few services have been installed in downtown Halifax. Installations of natural gas services where alleyways, driveways, or rear access are not available continue to be a challenge in areas where HRM by Design is applicable.

The rationale put forward by HRM to justify the application of the By-law to the permitting of natural gas facilities is as follows:

- i. No person shall undertake a development without a development permit; and
- ii. No person shall alter a building without complying with the By-law.¹

It is the second of these provisions that is the trigger to a development permit. Natural gas facilities do not require alteration of a building (typically, facilities are mounted on the face of a building) and it is only when HRM by Design rules are applied that buildings need to be altered.

On April 9, 2012, Heritage Gas made a written submission to the review process when it was underway with HRM by Design (Attachment 3).

Heritage is, once again, proposing exemptions to By-Law 3.5.1.f – *“locate heating, venting and air conditioning vents away from public streets. Locate utility hook-ups and equipment (i.e. gas meters) away from public streets and to the sides and rear of buildings, or in underground vaults”*— whereby allowing a natural gas meter to be placed on the front of a building, when other meter placement options are not available.

Natural Gas for Vehicles

There are significant opportunities to reduce operational costs, contract costs, and improve air quality with the conversion of fleets and procurement of new vehicles to utilize natural gas for vehicles. There are significant cost savings opportunities for Metro Transit, snow removal, refuse collection, HRM fleet vehicles to utilize natural gas versus diesel and other fuels. Heritage Gas is very interested in working with HRM and third party equipment providers to realize this opportunity.

¹ 5(1) No person shall erect, construct, alter, or reconstruct any building or locate or carry on any industry, business, trade, or calling or use any land or building without complying with the provisions of this By-law.

Attachment 2 – HRM Properties, Economic & Environmental Savings Analysis (as of June 2013)

BUILDING	# MONTHS INSTALLED	COST SAVINGS	GHG SAVINGS (TONNES)	SAVINGS AS % OF BILL
Northbrook School	74	\$39,895	185	26%
HRM - Public Health Services	63	\$19,695	103	23%
Harbour Solutions Project - Mawiomi	56	\$268,507	827	40%
Canada Games Centre	22	\$125,485	375	33%
Woodlawn Public Library Dartmouth	39	\$20,699	76	31%
Alderney Gate	65	\$549,935	1,443	46%
HRM Fire Station #12	40	\$49,663	169	33%
HRM Fire Station #7	19	\$19,745	62	32%
Cole Harbour Place	30	\$358,493	649	58%
BMO Centre	31	\$158,099	395	43%
HRM Fire Station #13	42	\$18,628	70	30%
Dartmouth Sportsplex	87	\$858,721	2,261	48%
Dartmouth North Comm Centre Building	33	\$17,581	55	34%
Mount Herman Cemetary Building	65	\$92,940	337	32%
HRM Fleet Facility	76	\$82,178	422	24%
Metro Transit Building	85	\$1,335,622	3,461	46%
Keshen Goodman Public Library	19	\$24,997	83	30%
HRM Fire Station #15	54	\$9,148	46	24%
Harbour Solutions Project - Aerotech	69	\$1,393,914	2,835	55%
David P MacKinnon Building	39	\$307,102	592	56%
Halifax Wastewater Treatment Facility	38	\$273,394	617	49%
Halifax Forum	54	\$395,104	883	52%
Halifax Ferry Terminal	24	\$18,078	54	34%
Public Gardens Superintendents	49	\$66,075	284	28%
St. Andrews Rec Centre	27	\$18,173	53	34%
Totals		\$6,521,868	16,336	38%

Attachment 3 – Written Submission to Plan HRM re: HRM by Design – The Centre Plan



April 9, 2012

Halifax Regional Municipality
Regional Planning Office
2nd Floor – 40 Alderney Drive
P.O. Box 1749, Halifax, NS
B3J 3A5

Re: HRM by Design – The Centre Plan

To Plan HRM,

The economic and environmental benefits of natural gas allow businesses to remain competitive and sustainable. Access to natural gas attracts businesses and, in some cases, is critical to their choice of location. Successful businesses lead to a more vibrant, sustainable, high quality and complete downtown environment; one that fosters growth, change and improvement.

As the Regional Centre Urban Design Vision Statement indicates, the Regional Centre will build on its distinctions and assets to nurture an urban context that enhances quality of life, enriches urban living and becomes a global destination. More amenable access to natural gas will contribute to achieving this goal as the Regional Centre will be able to attract and retain more businesses, while improving the environment and air quality.

In an effort to create a dense, livable and prosperous Regional Centre that will create economic and environmental benefits across the entire Halifax Regional Municipality ("HRM"), Heritage Gas Limited ("Heritage") would like the following to be considered by Halifax Regional Council for incorporation into a new Regional Centre Municipal Planning Strategy and Land Use By-Law:

Provision of natural gas meters on the front of buildings

There are challenges to natural gas conversions in downtown Halifax when there are no back or side walls of a building available on which to place a natural gas meter. Currently, HRM by Design imposes extra costs and a lengthy, complex approval process for a potential customer of Heritage because of meter placement limitations. When no side or back wall is available for a meter placement, an alcove needs to be constructed and the building owner must apply for a development permit for the alcove.

Heritage is proposing exemptions to By-Law 3.5.1.f – *"locate heating, venting and air conditioning vents away from public streets. Locate utility hook-ups and equipment (i.e. gas meters) away from public streets and to the sides and rear of buildings, or in underground vaults"* – whereby allowing a natural gas meter to be placed on the front of a building, when other meter placement options are not available.

The following outlines why HRM should consider allowing this exemption:

- **Counterintuitive to downtown development** – By imposing restrictions on allowing businesses to convert to affordable sources of energy, those businesses that prefer a lower cost source of energy will not locate in the downtown core, instead opting for business parks or other areas in HRM where access to natural gas is not cost-prohibitive.
- **Aesthetics** – There will not be any unsightly oil or propane tanks visible to the public. The size of a natural gas meter is considerably smaller than a conventional oil or propane tank. Also, costly and disruptive oil or propane leaks can be avoided.
- **Environment / Air quality** – Without affordable access to natural gas, business owners will continue to burn oil or propane – both more harmful to the environment than natural gas due to the release of compounds such as carbon dioxide, sulfur dioxide and nitrogen oxides. By burning natural gas, the air quality in the downtown core will significantly improve through the elimination of sulfur dioxide and emission reductions of other harmful volatile organic compounds.
- **Use of underground vaults is not feasible** – The wording in the existing By-Law suggests that the visual impact of natural gas meters on buildings could be limited by the use of underground vaulted installations. However, the use of underground vaults for gas metering and regulating equipment is no longer a practice common in the industry, and most other utilities with existing installations of this type have begun removing them in exchange for above ground alternatives. Further, the technical specifications approved by the Nova Scotia Utility and Review Board for Heritage do not allow for vaulted installations.

If the proposed exemption above is not acceptable to Regional Council, Heritage requests the following to be considered when it comes to natural gas meter placements:

- A pre-approved alcove and riser design; and
- A property tax credit by HRM whereby allowing property/business owners to lessen the burden of architectural and building costs.

Another item for consideration:

In looking at other comparable jurisdictions across the country, most notably Vancouver's Gastown, Heritage feels the downtown core in HRM could benefit from beautification in the form of old-fashioned, natural gas street lights. Subtle, unobtrusive touches such as this will contribute to a lively collection of shops, art galleries, antique stores, offices, studios and ethnic restaurants housed in dozens of restored and refurbished heritage buildings. The downtown core would then act as a magnet for the local population as well as thousands of tourists. Heritage is proposing the following:

- Incorporation of vintage, natural gas street lights into downtown design

Above all, Heritage feels that by ensuring business owners have access to cheap and affordable sources of energy, HRM can create and promote sustainable development in the downtown core. This will complement the Regional Centre Urban Design goal of vibrancy, animation and economic health that continues to be strengthened through the cultivation of a compact, civic-inspired and human-scaled urban fabric of streets, blocks and buildings.

Yours sincerely,

HERITAGE GAS LIMITED

Original Signed

Michael Howard
Director of Sales and Marketing

cc: Andy Fillmore, HRM by Design

To: HRM Council and Planning Staff
Re: HRM Regional Plan Revisions
From: Tim Leary, 21 Redwood Ave. Halifax

The regional plan has thus far clearly failed to meet the reasonable objectives set out in the original iteration of the plan, and improvements must be made.

It is also clear that the bias of the plan and its outcomes thus far have been in favour of the following:

- far more suburban development, at the cost of sprawl;
- increased infrastructure cost burden on taxpayers;
- increased dependence upon the automobile during a time of irreversibly rising energy costs;
- and a continuing likelihood of further deterioration of the central core of Halifax.

These issue most be addressed and properly resolved in the direction of smarter growth than we have seen demonstrated thus far. Our elected officials seem to be bent upon first serving the interests of developers rather than the interests of the larger community.

As an example of the bad planning that is proposed, I point out that the clause G-16 on p. 99 of the revision leaves absolutely no protection for the Williams Lake backlands. The sordid history of the attempt by some council members, their favoured developers, and yacht owners (most of whom are non-resident) to push an unwanted water and sewer scheme into the area must be seen for what it is: a selfish and undemocratic ploy. The backlands must be preserved. Halifax deserves no less.

The history of development in the region is a sad story. It is time to correct that reality, to do the right thing and plan for a dense core, walkable communities, preservation of green spaces, limited suburban sprawl, decreased dependence upon the automobile and better public transit.

Thank you. Please have my remarks placed in the record of the public discourse on this issue.

Tim Leary
Halifax NS B3P 1Y3

LMWAB

lake major
watershed
advisory board

P.O. Box 8388, Station 'A', Halifax, N.S. B3K 5M1 (Fax: 490-4808)

RP+5 Planning Officers
Halifax Regional Municipality, Regional Planning office,
2nd Floor, 40 Alderney Drive,
PO Box 1749, Halifax, NS B3J 3A5

June 10, 2013

Dear RP+5 Planning Officers:

Re: RP+5 respecting the Lake Major Watershed Protected Water Area Potable Water Supply (Lake Major Watershed)

On behalf of the Lake Major Watershed Advisory Board (the Board) I am writing to request that you consider the comments and recommendation described in this letter as part of the public consultation process on the proposed changes to the Regional Plan.

The Board feels that if the changes proposed in this letter are applied, it may help to streamline the development approval process with respect to Lake Major Watershed protection policies; and bring attention to the current and future by-laws, such that planning and development officers become acutely aware of the Lake Major Watershed and its applicable Provincial and Municipal legislation.

LEGISLATIVE AUTHORITY:

- Environment Act (Section 106) and its subsections relative to a designate "...area surrounding any source or future source of water supply for a water works as a protected water area";
- Statement of Provincial Interest Regarding Drinking Water; and
- Applicable Municipal Planning Strategies and Land Use By-laws for the Plan Areas affecting the Lake Major Watershed, namely:
 - North Preston, Lake Major, Lake Loon, Cherry Brook and East Preston
 - Cole Harbour/Westphal
 - Planning Districts 8 & 9 (Lake Echo/Porters Lake)
 - Planning Districts 14/17 (Shubenacadie Lakes)

RECOMMENDATION:

The Lake Major Watershed Advisory Board recommends the following additions and/or changes to *DRAFT 2.0 Regional Municipal Planning Strategy May 17, 2013 (Includes Chapter 3 as revised May 23, 2013)* sections:

- **2.2.1 Potable Water Supply**

Paragraph 2 under Potable Water Supply (p. 28):

“The land uses permitted within these watersheds should not threaten water quality. ... HRM will continue to allow for a variety of land uses as currently permitted at the community level, **[Insert here: such that each municipal water supply area is considered within every one of its applicable community plans, and]** as long as these uses do not threaten the municipal water supply. Activities and practices within the provincially designated Pockwock Lake, Lake Major and Bennery Lake Watersheds are further restricted by their respective regulations **[Insert here: and watershed advisory board/committee]** as prescribed under the *Environment Act*.”

BACKGROUND:

The Lake Major Watershed Protected Water Area was designated by the province in 1986 as a result of collaborative efforts between the local communities and government agencies of the day. As a requirement of the Designation, the Lake Major Watershed Advisory Board was created. The Board’s role is to act as a communication funnel where elected members meet 2-3 times per year as outlined in the Terms of Reference to discuss watershed related issues. Through further consultation including input from the LMWA Board, the Lake Major Watershed Protected Water Area Regulations were developed and enacted in 1992.

Halifax Water and the LMWA Board are responsible for monitoring and reporting on watershed related issues as legislated by the *Environment Act* (Section 106), and depend on the Halifax Regional Water Commission and the Halifax Regional Municipality as the responsible agencies to bring development applications to our attention. However many development permits have been issued inside the Lake Major Watershed that should have been brought to our attention as required by the current legislation and land use by-laws. In order to effectively manage the Watershed it is important for HRM to work with and recognize the Lake Major Watershed Advisory Board’s role in protecting the water supply.

To overcome these oversights, the Board recommends that the profile of the Protected Water Supply Areas be raised through RMPS Policy to ensure:

- a) that due diligence is paid to the current legislation and HRM by-laws with respect to Lake Major as a Designated Protected Water Area; and
- b) that MPS and LUB policies for a particular water supply area are consistent between each applicable Plan Area.

The requested change to the RMPS promotes consistent policy between the applicable community/secondary plans and LUBs which is pertinent to the protection of the Lake Major water supply. Consider, for instance, the Lake Major/North Preston/Lake Loon/Cherry Brook (LM/NP) Plan Area LUB (3.6) policy requirement that the LMWA Board review development applications within the Lake Major Watershed; whereas, the other three LUBs applicable to the Watershed area do not have this policy requirement. Such inconsistencies present confusion and opportunity for oversight. Creating consistent policy within the RMPS would help to overcome apparent oversights with respect to the Lake Major Watershed.

I am sure you can appreciate that clean water is of utmost importance to our community and to everyone who relies on Lake Major for its water supply. To adequately protect the quality of the water, land use planning and development activities must be carefully assessed and monitored to ensure that we are protecting this precious resource that is particularly vulnerable to land use activities.

On behalf of the Lake Major Watershed Advisory Board, I appreciate your consideration of this RMPS policy change. Please feel free to contact Barry Geddes, Watershed Manager at 869-4304 or Reid Campbell, Director of Water Services at 490-4877 if you have any questions or details pertaining to this request.

Respectfully,

Original Signed

Mack McMenemy, Chair
Lake Major Watershed Advisory Board

3

Hello HRM Planning Team,

I had an opportunity to read over the HRM Regional Plan, Draft 2 and immediately wanted to voice concerns about proposed changes.

According to Map 8, Road Hierarchy Classification (attached below), Hawthorne Street's classification is planned to be changed from local road to collector.

<http://www.halifax.ca/planhrm/documents/Map8-RoadHierarchyClassificationRP5.pdf>

My husband Ted and I, along with countless other residents from Hawthorne Street and the surrounding area, have been in contact with Gloria McCluskey for many years, expressing concerns about the excessive speeding on Hawthorne, and were working towards implementing traffic calming measures, to

ensure the safety of pedestrians and school children. This proposed change to Hawthorne's classification will have a significant impact on our efforts in the future.

We are writing to request this proposed change be dropped from the HRM Regional Plan, allowing Hawthorne Street to remain a local street. We welcome any opportunity to provide input, either personally or collectively in a community meeting.

Please advise if there is anything we can do to support this cause.

Many thanks,

Pamela and Ted MacDonald

Hawthorne Street

Attached is a written submission from Metro Community Housing Association (MCHA) to provide input to the 5-year Review of the Regional Plan. I have sent this message to both e-mail addresses associated with the process of public engagement with the review of the Regional Plan.

If possible, please confirm that our submission has been received.

I would be happy to answer any questions regarding the submission.

Thank you.

Cathy Crouse MSW, RSW

Executive Director

Metro Community Housing Association



Metro Community Housing Association

Submission to Halifax Regional Municipality on the Five-Year Review of the Regional Plan

Sent on July 3, 2013 via e-mail to PlanHRM@halifax.ca

1.0 Background Information on MCHA and Supported Housing Services

Metro Community Housing Association (MCHA) is a non-profit organization formed in 1974 to provide supported housing to people who have experience with mental health issues. We are funded through service contracts with the provincial Department of Community Services (DCS) through the Services for Persons with Disabilities Program (SPD).

The following is an overview of the supported housing services MCHA provides within our two major program areas:

- a) Residential Services:
 - Six licensed Small Option Homes with 3 residents in each home.
 - Four licensed Group Homes with a distribution of 4, 7, 9 and 10 residents.
 - A licensed Residential Care Facility (RCF) with 31 residents.
 - A licensed Regional Rehabilitation Centre (RRC) with 5 residents who are transitioning from the East Coast Forensic Hospital.

- b) Supported Apartment Services/Independent Living Supports (ILS)
 - 75 individuals living in apartments and provided with in-house and case management supports of up to 21 hours a week.

MCHA is the only fully independent non-profit organization within HRM with the mission to support people with mental health issues. Other organizations which serve the same population are for-profit operators or government services. We currently provide support to 159 individuals through a volunteer Board of Directors, 130 paid staff members, and an annual budget of \$5.8 million.

A major change in the provision of the DCS Services for Persons with Disabilities (SPD) Program occurred in May of 2010 when the provincial government amended the Homes for Special Care Act to include Small Option Homes. This decision was made to ensure that Small Option Homes would be licensed and residents would therefore have access to provisions within the Protection for Persons in Care Act. The process of licensing MCHA's six Small Option Homes was completed in July of 2012 when we were issued five-year licenses subject to maintaining licensing standards, which are monitored through twice-yearly inspections.

At the same time that this transition was underway the province was faced with the financial constraints imposed by the worldwide financial crisis of 2008. The direction that DCS has given to residential service providers is to increase the capacity within our homes wherever possible, and particularly within Small Option Homes. Early in 2013 the Department of Health and Wellness and DCS jointly issued a discussion paper entitled "Putting People First: Working Together to Support Independence and Dignity" which outlines the principles for the development of a truly person centered service system for seniors and people with disabilities. This paper states that there is a pressing need for the development of efficient and effective services and support systems and states that there are "approximately 280 people waiting for SPD residential services. Many are in hospital – some for as long as two or more years – even though they don't need acute medical or psychiatric care at that level." (Putting People First, p. 3)

2.0 Human Rights Protection related to Supported Housing

The United Nations Convention of the Rights of Persons with Disabilities, to which Canada is a signatory nation, states the following:

"Article 19 – Living independently and being included in the community

States Parties to this Convention recognize the equal rights of all persons with disabilities to live in the community, with choices equal to others, and shall take effective and appropriate measures to facilitate full enjoyment by persons with disabilities of this right and their full inclusion and participation in the community, including by ensuring that:

- a) Persons with disabilities have the opportunity to choose the place of residence and where and with whom they live on an equal basis with others and are not obligated to live in a particular living arrangement;*
- b) Persons with disabilities have access to a range of in-home, residential and other community support services, including personal assistance necessary to support living and inclusion in the community, and to prevent isolation or segregation from the community;*
- c) Community services and facilities for the general population are available on an equal basis to persons with disabilities and are responsive to their needs."*

The current framework of zoning restrictions within HRM presents a barrier to the human rights of individuals who require supported housing. The zoning restrictions also interfere with the efficient delivery of supported housing services. Given the violation of human rights and the pressing need for increased capacity of supported housing services in HRM, the Regional Plan needs to ensure that the current zoning restrictions are removed.

On April 12, 2013, representatives of MCHA and other agencies providing supported housing met with Sean Audas, Development Officer, Western Region; and Andrew Faulkner, Development Officer, Eastern Region to review the zoning regulations related to licensed Homes for Special Care. The following summaries and comparison chart provide an overview of the discriminatory, confusing and inconsistent restrictions that are currently in place within the zoning regulations for Halifax Peninsula, Dartmouth, and Downtown Dartmouth.

As the information provided below illustrates, the zoning restrictions provide significant barriers to where supported housing can be located, particularly if there are more than three residents in a home. With the current need for the Department of Community Services to increase the capacity of Small Option Homes, these restrictions will now have a greater impact on the human rights of people with disabilities to receive the supports they need and to live in the community with choices equal to others.

Overview of zoning restrictions in Halifax:

- 1) Licensed Homes for Special Care providing housing for 4 up to 10 individuals (including staff) can be in any residential or commercial zone, provided specified stipulations are met. The number of staff counted is the highest number of staff that would be on shift at any one time, e.g.: count one for single staffed homes, and two if double staffing is scheduled at any time of the day. If a supervisor or an administrator has an office in the home, they are also counted as a staff member.
- 2) Organizations that wish to relocate a home to any of the Residential or Commercial Zones that permit R-1 uses are required to meet the specific stipulations, including that the new location is not within 1,000 feet of another “special care home”. The agency is responsible for obtaining a letter from the provincial government to confirm that the location meets this requirement.
- 3) The exception to 2) above is the R-3: Multiple Dwelling Zone. In the by-laws for this zone there is reference to R-1 uses being permitted in 44(1)(a) but there is also a separate reference to a “special care home” under Other Uses 44(1)(g) (Page 72). There is also a specified stipulation in “48A Open Space for Special Care Home – A minimum of 35 percent of the lot area of any lot on which a building is erected, altered or used as a special care home, shall consist of landscaped open space.” (Page 78) Within this zone the number of residents is identified in the definition of a Special Care Home, which is “four or more persons”.

- 4) Homes with more than the R-1 limit of 10 individuals, including staff, may also be located in the P Zone: Park and Institutional. Special Care Homes are not specified in this zone but the uses listed in 67(1) for the P Zone includes “or another institution of a similar type” in (d).
- 5) The specific stipulations for special care homes embedded in the R-1 Zone, such as the requirement for outdoor landscaped space per resident, has not applied to Small Option Homes located in apartment buildings when they were not licensed. It is not clear how this will be affected by the fact that they are now licensed.
- 6) If a nonconforming use is in place when a property is purchased, the nonconforming use can be transferred to the new owner, provided that the use is in operation within 6 months of the purchase. After six months the non-conforming use approval expires. This is specifically stated in the Dartmouth By-laws as “discontinuance” (see Page 8 of these notes), and also applies within Halifax areas.

Overview of Zoning Restrictions in Dartmouth and Downtown Dartmouth:

- 1) R-1 – Single Family Homes: Group homes of 4 or more residents are not permitted in R-1M, R-1 A Zones. They are not specifically excluded, but they do not fall under the definition of “family” which permits up to 3 roomers or boarders.
- 2) R-2 – Two Family Homes: Group homes of not more than 6 residents are permitted.
- 3) R-3 – Multiple Family (medium density); R-4 – Multiple Family (high density) and C-2 – General Business: Group homes of not more than 12 residents are permitted.
- 4) The Dartmouth MF-1 (Multiple Family Residential Zone) permits in (48)(1)(d) “Institutions, other than for corrections use or for the treatment of mental cases.” This clause is highly discriminatory and offensive.
- 5) If a location is on a street that abuts to a more restrictive zone, the by-laws of the more restrictive zone will apply. For example, a home of four residents cannot be located on a street that abuts an R-1 Zone.
- 6) “Lodging houses” of 3 to 8 rooms are permitted in the Dartmouth By-laws in R-3, R-4 C-4 and MF-1 zones. “Rooming houses” are permitted in the Dartmouth DB – Downtown Business zone. If there are live in or overnight staff supports in lodging or rooming houses, the exclusion of Homes for Special Care in their definitions would apply.
- 7) In the Dartmouth By-laws Zone S - Institutional does not specify a size limit for “institutions”. The Downtown Dartmouth By-laws define a home for more than three persons licensed under the Homes for Special Care Act as a “residential care facility” and specifically includes them in the definition of an institution. Institutions established prior to July, 2007 are allowed to remain in the Dartmouth - Downtown Neighbourhood Zone. The Dartmouth - Downtown Business District Zone permits institutional uses.

Comparison Summary of Zoning Language and Restrictions

	Halifax Peninsula	Dartmouth	Downtown Dartmouth
Definitions	<p>Three or less residents considered a family through reference to the Halifax Charter.</p> <p>“Special Care Home” defined as for four or more persons, and licensed by the Homes for Special Care Act.</p>	<p>“Family” definition in By-laws provides for up to three roomers or boarders.</p> <p>“Group Home” defined as for more than 3 persons and licensed pursuant to the Homes for Special Care Act.</p>	<p>“Residential Care Facility” defined as for more than 3 persons and includes facilities licensed by the Homes for Special Care Act.</p> <p>“Institutional Use” defined to include a residential care facility.</p>
	Halifax Peninsula	Dartmouth	Downtown Dartmouth
Excluded Zones	<p>More than ten residents, including staff, permitted only in P: Parks and Institutional Zone.</p>	<ul style="list-style-type: none"> • Four or more residents excluded from R-1: Single Family Zone. • Seven or more residents excluded from R-2: Two Family Zone. • Thirteen or more residents excluded from R-3: Multiple Family (medium density), R-4: Multiple Family (high density), and C-2: General Business Zones. 	<p><u>Downtown Neighbourhood Zone</u> excludes institutional uses after July 5, 2007. Others in existence on July 5, 2007 are grandfathered as a non-conforming use.</p> <p><u>Downtown Business District Zone</u> permits institutional uses and rooming houses to a maximum of six rooms.</p>

	Halifax Peninsula	Dartmouth	Downtown Dartmouth
Other Restrictions	<p>R-1: Single Family Zone requires landscaped open space; 1,000 feet from another Special Care Home; and specified parking.</p> <p>R-3: Multiple Dwelling Zone requirement for landscaped open space is a minimum of 35% of the lot.</p> <p>Discontinuance: Transfer of a non-conforming use to a new owner expires after 6 months.</p>	<p>Streets which border on a more restrictive zone apply the more restrictive rules.</p> <p>MF-1: Multiple Family Residential excludes institutions for corrections use or for the treatment of “mental cases”.</p> <p>Discontinuance: Transfer of a non-conforming use to a new owner expires after 6 months.</p>	<p>Discontinuance: Transfer of a non-conforming use to a new owner expires after 6 months.</p>

Recommendation for Chapter 3: Settlement and Housing

The Board of Directors of Metro Community Housing Association is in agreement with the direction that Draft 2 of the Regional Plan has taken with respect to S-33 in Section 3.5 on Housing Diversity and Affordability, specifically:

*“(d) permitting licensed homes for special care of more than three residents;
(e) permitting small scale homes for special care as single unit dwellings and eliminating additional requirements beyond the use of as a dwelling.”*

The Board of MCHA recommends the immediate removal of restrictions related to Homes for Special Care within land use by-laws to ensure that the human rights of people with disabilities are respected within all areas of HRM.

The Board of MCHA also supports the intent of the sentence that was in Draft 1 of the Regional Plan, which stated in S-31C on Page 38: *“The number of residents permitted should be compatible with the prevailing land use.”* This statement is consistent with the principles of inclusion and social integration. However, it is important that the mechanism for making determinations of appropriate size and scale be delegated to the Development Officer level of decision-making. It would be tragic if this type of decision would involve either a) a lengthy process, or b) a process that requires a public meeting, as this would enable

discrimination of people with disabilities due to the persistence of prejudice and NIMBY attitudes.

3.0 Affordable Housing

Access to safe, accessible and affordable housing is one of the primary concerns of the people supported by MCHA who live in their own apartments. It is very difficult to access this type of housing with the \$535 a month that is provided by DCS through Income Assistance to cover the cost of both rent and utilities.

The provincial government's recent release of the Housing Strategy for Nova Scotia now provides a framework for collaboration with municipalities to pursue the development of mixed housing projects wherein a percentage of units are targeted to people with low and fixed incomes. It is encouraging that HRM has quickly and publically supported the provincial Housing Strategy. HRM has also recently shown support for this planning and policy direction through provisions for density bonuses to encourage developers to include affordable housing within their building projects. Section 3.5 of Draft 2 of the Regional Plan and the associated fact sheet on Housing Affordability outlines a variety of ways that HRM intends to support the goal of increasing our stock of affordable housing including *"permitting auxiliary dwelling units or secondary suites within single unit dwellings"*.

MCHA is in full support of efforts made to increase the availability of affordable housing and is particularly interested in the following intention stated in Draft 2:

"S-35 HRM may consider partnerships or financial support for non-profit housing organizations."

MCHA currently receives a direct financial benefit from HRM with the reduction of our property taxes of 75%, which must be applied for annually. We greatly appreciate this support, which enables us to allocate more of our funding to directly benefit of the people we support. As our budgets are becoming increasingly more difficult in balance, we would appreciate any further support the municipality could offer in this regard.

The MCHA Board recommends that HRM give consideration to the further reduction of property taxes for non-profit housing organizations from the current 75%, and a mechanism to eliminate the administrative burden of making an application on an annual basis.

MCHA is also very interested in beginning a discussion with HRM on collaboration and partnership on the implementation of our Property Development Plan to replace or enhance the six supported housing properties that we own. The types of support that we envision could be contributed by HRM within this partnership would include the sharing of technical expertise, provision of information on programs and assistance, consideration of

the sale of municipally owned land at below market levels, and property swap arrangements.

4.0 Food Security

As of July 1, 2013, the food allowance that is provided by DCS to MCHA clients who live in their own apartments is \$254 a month, which averages to \$8.35 per day. The amount that is actually spent on food is likely to be less because all personal hygiene and household items must be paid for from the food allowance.

The Settlement and Housing Chapter in Draft 1 of the Regional Plan included the following statement on Page 50 within the Section 3.9 on Healthy Communities:

“Food security, including access to healthy food within proximity to residential areas, is also paramount to good land use planning and community design. Food stores, markets and community gardens should be included within new and existing neighbourhoods and communities.

S-40D HRM shall, through the secondary planning process, consider health impacts and food security”

This statement is not included in Draft 2 of the Regional Plan and it was one of the only areas in Draft 1 that acknowledged the need for food security. Affordable housing is misplaced unless there is also access to affordable, accessible, and healthy food. People who need affordable housing rarely own a private car or can afford the cost of a taxi to obtain their groceries. The aging population, as well as parents with small children, needs to be able to walk to a local store to buy small quantities of food, as carrying heavy bags of groceries by foot or by public transit is not possible. Corner markets in residential areas that provide staple non-perishable foods as well as fresh fruits and vegetables are commonplace in other large cities but not in the areas of HRM delineated for the Regional Center.

The Board of MCHA strongly recommends that the Regional Plan include the intention to support the availability of healthy and affordable food, which is accessible to local residents without requiring the use of a car or taxi.

MCHA appreciates the opportunity to provide input to the review of the Regional Plan and we look forward to the final version and the resulting opportunities to increase the availability of supported and affordable housing within HRM.

If there are any questions regarding this submission, please contact Cathy Crouse, Executive Director at 225-7119 or ccrouse@mcha.ns.ca

Respectfully Submitted by:
Karl Lingley, President, Metro Community Housing Association

Dear regional Planning Team,

It has been brought to my attention that a new designation for Hawthorne Street is in the works. I must strongly oppose the designation change from "local" to "collector". This is a street full of young children (with more on the way!), an elementary school, families, dogs, cats and walkers going to and fro from the beautiful lakes, trails and parks in this neighborhood. Indeed, this is what attracts people to our area. I have been a resident on this street for 25 years and we constantly battle the issue of high speed traffic in order to protect our residents. Please do not, I repeat, DO NOT make this designation change for Hawthorne Street. There is already a serious issue of traffic running red lights at the corner of Hawthorne and Prince Albert. This is a heavily used intersection by both pedestrians of all ages as well as cars. It is a dangerous as is. We do not need to make it worse.

Thank you for your consideration on this matter.

Respectfully,

Louise Mussett

Hawthorne Street

Dear Regional Planning Team,

I am concerned to find out that the new proposed Regional Plan designates Hawthorne Street as a Collector Street. I live close-by, on Thompson St., and I have a number of friends with young children on Hawthorne St. This is obviously a residential street, and shouldn't be allowed to become a "cut-through".

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,

Barbara Orr

Susan and Kasia:

You wrote and asked my wife for her comments on the summary of the stakeholder meeting in June. She was not present, but has passed these on to me, as I did attend.

I prepared some notes about my recollection of what happened at Table 3. They follow:

Present at the table were Austin French and Bill Plaskett of HRM staff, Anita Price of the Museums Association, Meghan of the province, and Bev Miller and me from the Trust. I am not pretending to speak for these other people, but would welcome their further recollections.

1. The proposed Regional Centre Plan should not replace all the present Secondary Planning Strategies on the peninsula and in downtown Dartmouth. The Halifax MPS has 276 pages and took two decades to develop, and there is no way staff can develop now policies with that level of detail in a year. Similarly with the Dartmouth and Downtown Dartmouth SPSs. There are many excellent policies in the present neighbourhood plans. Some flexibility here would be welcome. A new Regional Centre Plan should be an overlay, in addition to the neighbourhood plans, just as the Regional Plan was added to these plans back in 2006.

2. There are 20 planners employed processing requests for plan amendments from developers. There are about 80 of these requests on the HRM web site. There is no provincial statute requiring HRM to deal with these requests. HRM could hold them until the respective plans come up for review. This was the practice in the former City. It is supposed to be the policy in the Downtown Halifax SPS. By entertaining these requests, HRM invites more applications, and more planners need to be hired, or developers complain about how long their requests are taking. If HRM changed to the former City policy, those 20 planners could work on new Heritage Conservation Districts, or reviews of existing plans. They

could be redirected from working for the interest of a few landowners, to working for the public good. More action on heritage conservation districts is desired.

3. The Stantec study shows there is room in the Regional Centre for 35,000 new apartments, with no changes in the rules. This is enough apartments to satisfy current demand for 63 years. So those developer-initiated planning applications are not needed. They just shift land values from many owners to a few. Also, with this large surplus of supply or development capacity, further increases in capacity are unlikely to have an effect on the decisions by developers about whether to build in the Regional Centre or in the suburbs.

4. The proposed Commercial Corridors of the proposed Centre Plan, in fact contain much affordable housing and several heritage properties. It would be counter productive if a change in zoning rules led to a loss of this housing and these properties.

5. HRM has changed the proposal that the federal Standards and Guidelines would replace the existing Municipal Conservation Standards, to a simpler statement that HRM would adopt the federal Standards. This leaves open the possibility that both sets of standards could co-exist for a few years while HRM prepares lists of character-defining elements, as required by the federal standards. This change is an advance.

6. It would be desirable for HRM to conduct a "Resident Location Study", similar to the Business Location Study, which was done in preparing for the Regional Plan review. The Business Location Study found that parking, cost, proximity, and commute times were big issues for businesses in deciding where to locate. Taxes and zoning rules were less important. Why do residents decide to locate in the centre, the suburbs or the rural areas? If HRM wishes to influence those choices, HRM should know what is likely to influence those choices.

I hope this helps you to understand some of the conversation at Table 3.

Best wishes.

Sincerely,

Phil

Burkhard Plache

5 Parkhill Road

Halifax, Nova Scotia

B3P 1R2

June 26, 2013

To Chair Dale Godsoe

and Members of the Community Design Advisory Committee

After attending the town-hall meeting on June 17, I would like to comment on the Draft 2 of the revised Regional Municipal Planning Strategy.

Overall, I like the direction the plan is taking.

However, I would also like to make a some suggestions and express a few concerns.

The growth targets urban / sub-urban / rural are measured by the number of new housing units. Do these numbers account for housing units torn down for new development?

Replacement of buildings is likely more prevalent in urban than in other areas, and may skew the numbers.

I am in support of directing growth to the urban areas, but would even go so far as suggesting to increase the growth there (Scenario A or B) to catch up with the developing deficit.

Worldwide there is a correlation of density of population with innovation and wealth. Cities are motors for growth, and a well-tuned infrastructure is key. The concept of the regional center is important with this regard.

I also like the concept of growth centers, which will provide local points for employment and services. Maybe consider permitting high density residential units close to growth centers, placing many people in their vicinity, making active transportation a natural choice.

I heard that many industrial lands see use as retail and office space. In my view, such a waste should be prevented. Offices can better be located in high density developments around growth centers and the urban core. Only business with a proven need for industrial lands

should be able to locate in industrial areas. Maybe there is a need for zoning distinctions between heavy / light industrial, service, and retail.

I am also in support of focusing suburban growth on areas already serviced by sewer and water, as well as giving consideration to nearby infrastructure (schools, police and fire stations, shopping, services) to increase the use made of existing infrastructure, thereby reducing costs that would pile up if such infrastructures had to be put in place (and the cost would be borne by the general tax base, not by the new development). - Alternatively, charge the infrastructure cost to the new development.

Along the same line of argument, put a moratorium in place to prevent suburban development in areas designated as urban reserve. (Those areas were designated with a reason.) Keep those areas as reserves, and review at the end of the 25 year plan. Let's not squander our lands haphazardly, but leave space for the coming generation to use as will be deemed wise at that point in time.

Rural development with flexible Conservation Design are a laudable concept. I would go even further, allowing e.g., a high density complex with integrated waste-water treatment on maybe 10-20% of the land, with the remainder left for recreational use of the residents. Dense rural development may be more cost effective in the long run, and also allow for the establishment of a village structure more typical of (for example) Europe, where even villages are walkable. Develop a vision for greenbelting, which keeps sufficient lands available for an interconnected network, benefiting residents as well as plant and animal life.

I am a semi-regular user of Metro Transit. I am generally satisfied with the service. However, I am disappointed that the real-time scheduling system, in the works for more than 15 years (a co-worker from back then was at that time working on that system) is still not available to the passengers. The biggest weakness of the transit system is the sporadic lateness of buses. I

occasionally cannot choose Metro Transit when going for time-critical appointments. With no way of knowing when the bus will finally arrive, I make alternate arrangements to avoid missing an important appointment.

Also, the Metro Transit route maps deserve an overhaul. It's general structure has not changed for at least 20 years (maybe longer).

And, thinking way into the future, the routes themselves might benefit from a change to a more modern design: At rush-hour, have buses go every 5-10 minutes from e.g. Mumford (and equivalent Dartmouth) terminal to downtown, making those arriving for a connection less dependent on short connection times. Maybe ask a class of planning students to develop a few alternative scenarios, and present those to the public.

I have also some concerns with a number of sections of the draft plan:

Section 6.4 proposes to "replace" the existing Municipal Planning Strategies & Land-use bylaws.

I think an overall replacement is premature, vague, and unrealistic at this point in time. I think, the existing strategies and by-laws better be adjusted or amended, as needed, rather than wholesale replaced. [Maybe such amending was intended by the wording, but it is not clear to my reading.]

Section 9.7, clause G-16 was mentioned at the town-hall as a way to allow extension of landuse designations to neighboring designations. It was indicated that the intent was to restrict this extension to bring small parcels in line with larger surrounding/neighboring parcels.

No-where does clause G-16 make this clear. Either G-16 should be removed from the document (as it allows in principle arbitrary re-designation contrary to the regional plan) or clause G-16 should be rephrased to guarantee that a re-designation is only possible under a set of very specific conditions (i.e., the re-designated parcel's area must be less than 25% of the area of the abutting parcel, so as to guarantee the continued integrity of the regional plan.

Respectfully submitted,

Burkhard Plache

To whom it concerns,

In response to the draft presented open house on June 17 I offer the following input:

The current draft is not acceptable as written because

clause G-16 on page 99 does not appear to offer any protection for urban reserve lands if they abut serviced land.

I feel strongly that we need an abundance of wilderness area for urban (and sub-urban) recreation.

In example, the Purcell's Cove/William's Lake Backlands are an ideal area to preserve for current and future non-motorized recreational purposes. They seem to be currently designated as urban reserve.

The area would be ideal for a Greenbelt type of designation. It is close to the urban core and is accessible by public transit.

The area is an invaluable resource because of the multitude of unique natural features and widely varied recreational opportunities.

The vision of a Wilderness Greenbelt as a substantial area of protected wild land surrounding the compact growth area of a dense urban core is a means of promoting an active healthy community. An additional benefit would be attracting more density to the core because of the availability of a permanent wilderness recreation area. People would feel they can work and re-create within their own community.

Finally, a greenbelt is valuable to residents on both sides of it. We tend to focus on urban recreation but the same benefits accrue to suburban citizens as well. So, double good for HRM!

Please consider the wisdom of the above in your next draft. Contact me for any further input you would like.

Vince Purcell

Purcell's Cove Road

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.

Regards,

Alex Rhineland

Alex Rhineland

Halifax, NS

June 27/13

Attached is the S.R.A. written submission for public input to the 5 year Plan Review. This document was approved at our monthly meeting last night.

Members felt that changes to the original plan should be made more clear in the review document. Perhaps by highlighting in colour was suggested.

In any case, if you have questions about our submission, please feel free to contact me at my home phone #477-2035.

Nancy Wooden, Chair

Spryfield Residents' Association

The Spryfield Residents' Association

Comments on the RP+5 (Draft 2.0) Report

The Spryfield Resident's Association (S.R.A.) thanks Halifax Regional Municipality for the opportunity to comment on the 5-year review of the Regional Municipal Planning Strategy. Our comments will follow the format of the report for ease of comparison with the document. Some of our comments will be general as they affect the whole municipality but others will speak to issues unique to the greater Spryfield area.

[1.1 \(Pg.6\) The First Five Year Plan Review](#) The Spryfield Residents' Association is generally in agreement with the growth targets but cautions that continued development in Mainland South (Suburban & Rural) will result in the need for significant new infrastructure to support such development (roads, sidewalks, sewers, bridges, schools, etc.) As well, there are still many existing streets needing paving, curbs, sidewalks.

(pg.7) **Sustainable Solutions** Suggest need to add the phrase “more beautiful, walkable and complete communities” to Regional Centre enhancement. Our City Centre should be filled with parks, outdoor furniture and artworks linked by pleasant walking areas between destinations.

1.2 **Vision and Principles (pg.8) Manage Development...** SRA encourages redevelopment of vacant lots and “tired” properties before consuming more natural spaces for development. Municipality should ensure any new development is a first class asset for any neighbourhood and appropriate for today and the future. Questions should always be asked about what the City will look like and need 50 or 100 years from now.

1.2 **Vision and Principles (pg.8) Develop Integrated Transportation systems ...** Halifax already has the rail cut through the peninsula to the downtown and port areas. Partner with CNR, Ottawa and the Province to build a light rail commuter train. Find innovative ways to span the North West Arm or have water taxis such as False Creek in Vancouver.

1.3 (pg.8) **Environment Objectives: #2** mentions “lands suited for renewable resource extraction”. What does this mean? Doesn’t sound good.

1.3 **Settlement and Housing:** Agree with 1-6. (b) SRA would like to point out that Mainland South has few connections with the rest of the City, just Herring Cove/Purcells Cove Roads leading into the Armdale Roundabout, and the North West Arm Drive. But we need more connections (bus, trails) with Mainland North, and the peninsula. There are few walking trails and none that connect with work or shopping destinations. We have no old rail beds to convert to trails so a trail has to be built along NWArm Drive to connect to the trails north of St. Margaret’s Bay Road. This could follow the power lines on the edge of Long Lake Provincial Park. Again, partnerships with NSP, Province and HRM are required.

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RP+5 Submission by SRA

1.3 Objectives

(pg.10) **Culture and Heritage:** Many sites have yet to be identified and it is not clear when they will be. Therefore, even if this is not appropriate time, the Spryfield Residents’ Association would like to point out several sites in Spryfield needing protection and inclusion.

1. The Rockingstone at Kidston Lake
2. Table Rock at Kidston Lake
3. Kidston Lake earthen dam
4. Long Lake dam

Chapter 2: Environment, Energy and Climate Change

2.2 (Pg.19) Green Belting: Building an Open Space Network

SRA supports Open Space network concept.

Table 2-1, (pg.20) Open Space Typology SRA questions why, under natural resource, there are several groupings that seem to be commercial support. This is confusing and perhaps should be a separate group.

(Pg.22) (E-2) and (E-3) Still need these concepts of prohibiting residential development on new roads and lots with minimum road frontage. The sentence “Those provisions permit the creation of an additional lot which does not meet the minimum road frontage requirements, provided the area of land being divided was in existence What does this mean? How could land have not been in existence unless it was infilled wetland.

We know of one instance of a recently built large home that has no road frontage on an accepted street. It was built behind an existing home. Other new homes in subdivisions are overbuilt to twice the 35% lot coverage allowed. How does this happen? Does the City have enough inspectors or are such instances ignored?

(Pg.25) 2.2.3 Regional Parks

Spryfield Residents’ Association supports additional parks throughout the municipality. However, we would like Long Lake Provincial Park in Spryfield to be an asset to the community and available to the public. After 30 years as a park, LLPP still has no groomed trails. The Park is almost unusable and is overdue to be funded for the residents of the Halifax Region. This Park has huge assets. Long Lake and its environs could be home to a paddling club, provide jogging/walking trails and still retain its natural habitat for wildlife. Perhaps when prioritizing Regional Parks in the system, Long Lake could be rated as needing a push to the top for any funding available.

2.2.5 Natural Areas and Natural Corridors

(Pg.26) We looked at the map and noted trails along McIntosh Run and another southwest of Kidston Lake. The trail on the wooded Kidston Lake Land is not useable or marked and may only be used by wildlife. It should be removed from the map as it leads the viewer to think there is a cultivated trail there linking communities. Even worse, one thinks this land is still in public hands instead of sold in 2003 to a land developer.

The Spryfield Residents' Association has lobbied for 10 years to have government reacquire the Kidston Lake lands (800+ acres). Section 2.2.5 was written to celebrate natural corridors. This parcel of forest, lake and wetlands around Kidston Lake is essential for wildlife to move from the Herring Cove backlands to Long Lake Provincial Park and Terrance Bay Reserve. It should be acquired and protected.

(Pg.29) 2.3.2 & 2.3.3. Wetlands Protection and Riparian Buffers

Today, subdivisions can build into wetlands and riparian buffers. For example, a house was built on one of two lots created by infilling Kidston Pond with rock fill. It is obvious to a casual observer that wetland extended into this new building lot. Someone is approving this. Riparian zones need buffering from human activity and wetlands need protection from infilling for development.

(pg.37) Settlement and Housing:

SRA is generally in agreement with growth targets, but need to proceed in rural areas with caution. New communities need and want infrastructure which comes with costs.

Pg.38 3.2.2 Urban Reserve Designation:

#5 Kidston Lake Lands and #6 Purcell's Cove backlands were considered untouchable in the original Halifax Municipal Development Plan developed in 1980's. These lands were held back from development by requiring the 2 things: construction of a NorthWest Arm bridge and secondary sewage treatment. Council of the day, based on intense input from the public, felt that development of these lands should be held for future generations to decide. Within a decade, the Plan was amended and the planning for an Arm bridge was discarded. Now

development is happening on both these parcels. We have a small window of opportunity to reacquire the remains of the Kidston Lands.

It is unsure if we have any chance to secure future Arm bridge approach land behind Williams Lake. Yet we are talking about a 3rd Harbour crossing. This needs a second look.

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Submission RP+5 by SRA

(Pg.42) Table 3-1, Suburban District Growth Centres

We support Spryfield as a SDGC but look forward to watching plans progress.

(Pg.56) S-33 c) permitting auxiliary dwelling units or secondary suites within single unit dwellings and eliminating additional requirements beyond use as a dwelling.

This is going to be a very contentious issue. The Spryfield Residents' Association is reluctant to approve the concept of permitting secondary suites in R-1 neighbourhoods. People have paid a premium to own an R-1 dwelling. How will they be compensated for higher taxes paid over the life of the dwelling? This matter should be the subject of town hall meetings throughout the Municipality. Any change should be accompanied by stringent regulations overseen by a regulatory body issuing permits. The County of Halifax was moving to secondary units in R-1 neighbourhoods in the 1980's. Two important regulations at that time were 1) Dwelling must be owner-occupied and 2) the secondary unit should be confined to ½ floor area of main dwelling. Again, this should only move forward after public consultation.

Question: What does "eliminating additional requirements beyond use as a dwelling" mean? What does this allow or prevent?

Chapter 4; Transportation;

(Pg.57) 4.1.3 Objectives:

“Forecast the region’s need for mobility and provide service and infrastructure to meet this demand..... This opens the discussion of future needs for Arm bridge and impels municipality to plan to include a span across the NorthWest Arm in its long-range planning. Without such a span, significant development in Mainland South should be curtailed.

Mainland South also needs active and transit connectors to other parts of the City. Again, plan to build trails near NorthWest Arm Drive along NSP right of way. Transit routes should connect Spryfield with Mainland North. Innovative forms of transportation should be explored to connect Mainland South to Peninsula South. Water taxis, cable cars, may address pedestrian crossings of Arm.

(Pg.62) T-13 We recommend the establishment of a Transportation Reserve Zone for a future North West Arm Bridge for reasons mentioned already. This should be included in Map 7. If it is appropriate to include a 3rd harbour crossing to service anticipated development, then it is equally appropriate to include a North West Arm crossing to service the development that is occurring in Mainland South which has few access points.

(Pg. 76) 7.4 Archaeological Resources: Already suggested areas needing protection under the Special Places Protection Act including the Rockingstone at Kidston Lake.

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Submission RP+5 Report by S.R.A.

(pg. 91) 8.7 Utilities

Whenever possible, antenna and telecommunication towers should be placed on top of buildings rather than on higher towers in natural areas.

Chapter 9: Governance and Implementation:

(Pg. 96) 9.1.1 Objectives

SRA agrees with objectives. Need better followup to ensure plans (eg. Visioning) are carried out and considered in future decisions.

SRA recommends the style of meetings meant to inform or engage public opinion should take the form of town hall meetings. Sessions that divide public into issues-related tables means that public neither hears or is heard on the whole spectrum of the discussion. In a town hall style meeting, everyone in the room can hear the scope of the issue, presented by staff, and then can ask questions of staff. Everyone hears everyone's concerns and the staff hears and records the same. This system works for Council at public meetings, it should also be used to engage the public.

Thank you again for the opportunity to make our views known. We realize that some of our views are perhaps more specific to our local concerns than this review anticipates, but we feel these issues need to be addressed. Hopefully staff will consider these comments and concerns as they prepare the RP+5 report for further consideration by Council.

Nancy Wooden, Chair

Spryfield Residents' Association

Contact #: 479-2035

Matt Whitman,

Thanks for dropping in the other day. I am attaching an unpolished essay that I have been formulating for 30 years and written numerous times. I remember meeting with Kate Carmichael and a whole bunch of people(including Peter Kelly) to talk about commuter rail, when there was nothing at the Bedford Waterfront and we imagined hundreds of people living there and working downtown-linked by the obvious.

There have been decades of academic study and hand wringing about how to revitalize lovely old Halifax. Sadly the heritage core of the city is dying-the veritable heart of the city has been atrophying from congestive heart failure certainly for the last 40 years. There comes a time when some transformative act sets in motion a process which leads to incremental change. My belief is that the restriction or closing of

Barrington Street is just such an act. Once this is done many issues also will be addressed as more of the downtown core calls for 'pedestrianization.' Truck access to the port through the southend rail cut needs to be addressed-despite the powerful uproar that the 'well connected' will raise-That rail line has supported filthy diesel emissions for decades and there has been no problem accommodating the most discriminating and valuable real estate in Eastern Canada. The resolution of the 'interchange from hell' is also part of the problems seeking solution. I suggest it will proceed well if the preservation of the 'heritage core' of the city is converted to a pedestrian space. This is the heart of the issue. If there is no pulse, no desire at the heart-there is no organizing principle. Everything is ad hoc and the result is a predictable mess. My suggestion is that council should pass a motion that 'Barrington street will have vehicular traffic terminated or greatly diminished within 12 months.' Then get it done.

As evidence of the wisdom of this course, I was fortunate to visit Cardiff, Wales, a port city, with a 19th century architectural heritage (anchored by a fortress with Roman foundations) and I know there are many other examples. It is a regional center and it has attempted, in dramatic fashion-far more than Halifax-to respect its past and create a rich architectural future. This was done by taking the majority of the core of the old city and turning it into a pedestrian area, that has servicing capacity at designated times. It is really a treat. It is alive with people and commerce. And the heritage is lived with, not memorialized and separate. There is the pulse of community that you can feel on a nice hot summer day/evening along Halifax waterfront. There world is there and there is peace and there is hope-how fortunate we are. The world needs spaces where it can mingle and see itself-Halifax with all it's youthful assets needs this space.

So that is my piece. I have attached a few shots of Cardiff and one of a covered mall on the South side of the Thames near the new "Shard"-just for future envisioning-sorry I couldn't figure out how to attach those files to this email, so they will come by additional emails..

Regards. Larry Thomas

PS. In regards to suburban sprawl, I think the evidence across North America is that, unrestricted, it creates dead zones at the cultural heart of communities and that it is financially unsustainable by municipalities. I count myself incredibly fortunate to live in such sprawl-but you can't grow a viable city this way and I can't pay enough taxes to support the real cost of where I live.
