

## Centre Plan Package A – Community Letters and Submissions

### February 23 - May 9, 2018

Number	Contact	Comment	Attachment
COM001 2018-03-07	Madeline Waddington	<p>During the last round table session this morning, Madeline Waddington with the Nova Scotia Health Authority and representing the Halifax Food Policy Alliance, joined the commercial conversation.</p> <p>She, The Alliance, is interested in spreading access to healthy food and its availability into our communities.</p> <p>She is very interested in our Urban Agriculture Policy and Regs. Some of that detail is package B (chickens), but would be interested reviewing the documents to see how well they match up with the Alliance's goals. I have informed her of our consultation rollout schedule</p> <p>Here is a handout she gave me (attached). The intent was for us to understand what they do and what their goals are.</p>	Appendix A  Halifax Food Policy handout
COM002 2018-04-03	Eric Rapaport – Banook Area Residents Association	Comprehensive newsletter	Appendix B  Banook Area Residents Association Newsletter
COM003 2018-02-20	Pat Whitman Chris Annand, Co-Chairs  Park to Park Community Association	<p>Re: Centre Plan Review</p> <p>We, Park to Park attended the January 16, 2018 Council meeting as part of our continuing interest in seeing the Centre plan through to fruition.</p> <p>We were particularly interested in the amendment put forward by Councillor Mason, his rationale and the ensuing discussion including the comments by Ms. Denty.</p> <p>We believe his recommendation to allow the south end area from South Park Street East and South Street south to Inglis Street to have certain locations, possibly 20, classified as Higher Order Residential (HOR) rather than an area of contiguous Established Residential (ER) zoning has some validity given the current mixed housing neighbourhood. We were encouraged by Ms. Denty's comments that the Centre Plan was a work in progress and that she was willing to</p>	

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		<p>re-examine those sites to allow the proposed revitalization to occur, recognizing the current non-unified form of land use.</p> <p>In light of the amendment and the willingness by staff and Council to consider non-contiguous zoning in the South end, we Park to Park would like to bring back our earlier request of November 30, 2016, a letter to Jacob Ritchie, where we requested a similar approach of mixed HOR and ER designations for Wellington Street. In our rationale we had noted that Tower Rd was essentially being treated this way. We would suggest that the west side of Wellington Street as identified in the Centre Plan should remain HOR while the east side would be ER with the exception of the the non-conforming Wellington South, a 5 storey condo building on the east side of Wellington Street. This would avoid the prospect of a tunnel of six multi-storied buildings on both sides of this short two block neighbourhood street. We believe that our request fits into the stated policy objectives particularly protecting residential neighbourhoods and ensuring a balanced distribution of housing especially on a small side street like Wellington Street.</p> <p>We ask that you consider this request and recommend that the proposed zoning on Wellington Street be amended before the Centre Plan is approved.</p>	
COM004 2018-02-20	Alan Parslow, CEO Deep Vision Inc.	<p>I hear that you are standing in for Jacob Ritchie on the Centre Plan while he is on leave. In that regard I want to introduce myself as President of the Downtown Dartmouth Neighbourhood Association. I have met and had correspondence with Jacob and our association members attended the Dec 11 meeting at Alderney Gate regarding the changes to the Downtown Dartmouth Secondary Municipal Planning Strategy to conform to the Centre Plan.</p> <p>Downtown Dartmouth had somewhat fallen through the cracks during the Centre Plan public hearing process so there has been a delay in determining what changes are being suggested for the land Use By law component of the 2018 Centre Plan. And there have been no discussions on the specifics with the community. We were assured by Jacob that those discussions would take place and it is in that regard that I am writing on behalf of our neighbourhood Association.</p> <p>We understand that Package A, which contains the recommendations for change, will be ready on Feb 23rd. We also understand that the public meetings for all of Dartmouth will be held Mar.22,&amp; 28 &amp; April 5. In order to be prepared for those meetings we are requesting a copy of</p>	

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		<p>the Downtown Dartmouth component of Package A. We could pick up a printed version or you could email a version. We would appreciate it as soon as possible in order for our members and others in the community to consider what is being recommended by the city, since we have had no input into the document.</p> <p>The 2000 DDSMPS had extensive public input and the community was quite satisfied with the document and the LUBL. Now that the city has, on its own, re-opened some of the zoning, our community must re-visit the original document. We feel strongly that any changes to the original LUBL must have the same thorough, consultative process before it goes to council. We trust that you will do this.</p>	
COM005 2018-02-20	Pat Whitman Park to Park Community Association		Appendix C  Letter amended from earlier version.
COM006 2018-01-23	Jeff Weatherhead Banook Area Residents Association	<p>Yes, can you please book BARA at MicMac AAC for a Centre Plan Road Show <u>afternoon and evening session on February 7<sup>th</sup></u>?</p> <p>We would like community engagement pre-release and we will be able to message and follow through on Centre Plan with the March 28<sup>th</sup> post-release presentation.</p> <p>Provided there are not material adverse revisions from the past draft version, BARA is one of HRM Planning's strongest supporters of Centre Plan, and the sub classification of scale development by Downtown, Centre, Corridor and Residential Neighbourhood structuring. BARA requested the Grahams Corner Corridor area be selected as a Corridor for higher residential density and sees both a need and opportunity for area residents in the development of 6 acres surrounding NAPA, as well as redevelopment of the Ultramar lands and Walker Funeral Home Sites as per Centre Plan recommendations.</p> <p>Grahams Corner has been lucky to have a recent ongoing redevelopment of Paddlers Cove that retains scale and compatibility with the community and lake, and optimized investment through refurbishment of existing infrastructure.</p> <p>BARA understands that as an area we need to work to attract integrated local development in a streamline fashion to compete with Centres such as Quinpool where Developers seek excess profit with too high a change in density rates because of proximity to Downtown, Hospitals and</p>	

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		Universities. We see Centre Plan as the best path forward for that local shift for seniors to stay within their community as they downsize from area housing that frees up for renewal by young families and professionals.	
COM007 2018-03-02	Kathy Moggridge	Lengthy email exchange between Beverly Miller, Peggy Cameron, Andrea Arbic and others that talks about the community engagements invites and process. No feedback on Package A per se.	
COM008 2018-03-06	Peggy Cameron	Exchange between Carl and Peggy Cameron about Storefront hours	
COM009 2018-02-23	Beverly W. Miller	<p>Unfortunately, your response to my points in the letter to Chris Perkins were largely unsatisfactory. For example; corridor sites re: taller buildings. You wrote of 'limited sites' that will be eligible for 8 storeys. You claim these will all be decided by 'the end of the week', with proper transition policies. How is it that you can send me an email noting there will be 'limited sites' identified on Friday, when on Wednesday with the end of the week two days away, and the release of 'Draft Package A' you are not able to identify them?</p> <p>Later on you claim 'discrepancies will be cleared at the end of the week' (two days later?).</p> <p>As for transition to existing properties...I pointed out in my letter that 'transitions' to neighbouring residential would be impossible in most cases when the Corridors (with mostly 100' lots) back on to residential properties which are also no more than 100' deep. You completely ignored this observation and simply repeated that there will be transitions. Let's take the Willow Tree project. I would be interested to see where the transition would/could take place to Parker St. and the short streets to the north like Welsford. Yet at the public information meeting last spring I (and others) got the impression that HRM Planning and Development thought the APL project was just fine. HRM planning needs to immediately identify areas with sufficient 'transition space' and limit developments to those sites. What you are now proposing will simply cause more suspicion.</p> <ul style="list-style-type: none"> <li>• Further to this idea of transitioning. HRM Planning and Development completely ignore the statement in the Stantec report which notes that there is sufficient space in the Centre to satisfy future growth, WITHOUT DISRUPTING EXISTING NEIGHBOURHOODS. Why is it that that portion of the report seems never to be incorporated into any statements/policies on this matter?</li> <li>• One last thing. You state that Density Bonusing is the only tool that HRM has to 'encourage' affordability. The two instances with which I am familiar are, the MaryAnn where the developer promised affordable units and was subsequently allowed to swap</li> </ul>	Appendix D Letter

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	<p>them for more parking spaces and the Trillium where the developer traded millions of dollars in development rights for the ‘lighthouses’ outside the building which reportedly cost the developer somewhere in the neighbourhood of \$75,000. Not a bad deal, eh? Why waste time...we are not going to get affordability.</p> <ul style="list-style-type: none"><li>• I am attaching an OPED piece I wrote introducing the policy of Community Amenity Contributions which are used on the west coast. I think you will see how lame density bonusing, as we have experienced it, compares to the real advantages of CACs. Since it is now ‘the end of the week’ I look forward to all the explanations of how many of these unexplainable policies will unfold.</li></ul> <p>Thank you. Beverly Miller</p> <p>Hi Beverly,</p> <p>Thanks for your email. I did see Chris’s synopsis of my presentation, and there were 1 or 2 things stated that were not 100% consistent with the presentation I gave, but generally the synopsis was a good one. Discrepancies will certainly be clarified when the draft Package A policies and regulations are released at the end of this week. Digital links to the plans will be posted to our Centreplan.ca website as soon as they are available. To your questions below:</p> <ul style="list-style-type: none"><li>• Corridor heights will be primarily 4-6 storeys, however there will be a limited number sites in strategic locations on corridors that will allow heights up to 8 storeys.</li><li>• While the draft plan notes that Centres and Corridors are good places to add households to the Regional Centre, we’re acknowledging that not all of these sites are created equal. As such, when the draft by-law and plan are released, you will see we’ve included transition policies into the Corridor, Centre, and Higher Order Residential designations. These transition policies require increased and enhanced setbacks and landscape buffers when development takes place on a Corridor, Centre, or Higher Order Residential property which backs onto an established residential property. The intent of this is to help these larger buildings transition more gradually into the lower scale housing that is often nearby.</li><li>• Density bonusing is one of the few tools we currently have in planning so as to obtain greater affordability in housing units. This tool is proposed to be expanded significantly throughout the Regional Centre in the draft plan. To your point about a greater role for the Municipality in affordability, Regional Council recently passed a motion asking for a staff report on the possibility of HRM taking over the housing portfolio from the Province. This report will return to Council in the coming months, and depending on Council direction may inform future policies.</li></ul>	
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		<p>I hope the above is helpful, and would encourage you to come out to one or more of our upcoming open houses in March. Locations, dates and times can be found at <a href="http://centreplan.ca/">http://centreplan.ca/</a></p> <p>Good Morning Carl,</p> <p>Peggy Cameron recently sent around Chris Perkins's report on your presentation to the Halipad Real Estate Group.</p> <p>If the report is correct there are several of your points that need clarification.</p> <ul style="list-style-type: none"><li>• One of the most obvious was the statement that heights along the corridors would be 6-8 storeys. Is this not an inflation of the number of storeys which I understood to be 4-6 storeys and which is, I believe, the number that has been cited during the Centre Plan process so far?</li><li>• Then there are two assertions that seem to be in direct competition with each other; the allowance of much greater height and density and the idea that "high density property will transition into residential areas without negatively impacting them". Peggy Cameron did a photo study, termed 'Corridor Wasting Disease' of all the buildings that will be affected by the density increases along the west side of Robie Street (one of the 'corridors' to be densified). It is clear from the photos that most of these are houses and some of particular interest architecturally and historically. What is also clear to anyone familiar with these areas is that they front on extensive residential neighbourhoods. It would be very interesting to have an explanation from you of how the replacements for the Robie St. buildings, which will be acquired over time, allowed to deteriorate, and eventually torn down with higher buildings in their place will 'transition' into the residential neighbourhoods directly behind them, "Without negatively impacting them" as you said in your remarks. Given that most city lots are, at most 100' deep, this seems to be a bit of fantasy, and a cruel one at that. What is more likely is that, as has been pointed out, Corridor Wasting Disease will morph into Neighbourhood Wasting Disease'. The same is true of other corridors, Agricola St., for example.</li><li>• There is one other point that needs clarification. You are quoted in the report as stating that there is the 'expectation' of affordability. This leaves the issue in the hands of the developers which seems rather peculiar. Why isn't the city taking responsibility...they will issue the permits.</li></ul>	
COM010 2018-02-20	Andrea Arbic	Thanks for sending this. The post I saw on Facebook about a presentation you had done to some real estate association mentioned a different target for the percentage of new growth in	

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		<p>the regional centre/suburban/rural areas, compared to the last version of the centre plan I don't see anything like that in the PP presentation you sent. Is there another version with more detail?</p> <p>And one more quick question if you wouldn't mind. I've been going back and forth on another Facebook page with a guy who keeps making statements that I don't believe are true. I thought maybe you could provide the definitive answer.... He says that "Affordable housing as density bonusing applies today right now – to all parts of the urban core." I thought maybe he was thinking about downtown Halifax, where I believe that density bonusing rules were approved for that area in 2009 as part of the first stage of HRM by Design. But buddy insists that rules already exist for the whole urban core. Is that correct?</p>	
COM011 2018-03-06	Peggy Cameron	Copy of email referencing Storefront Hours and noting it was closed when they went to visit.	
COM012 2018-01-19	Jenny Lugar	<p>Hi Elora, Sean, Carl, I'm sorry it's taken me so long to pass along the materials from our Regional Main Streets campaign that we launched last week! We'd actually intended to send them out to you guys so you could circulate within HRM prior to the press conference, and also to invite you. But my event manager had a lot on his plate and it seems to have slipped our notice. So, please find attached the Position Statement and the press briefing. Also feel free to check out the webpage: <a href="http://ourhrmalliance.ca/regional-main-streets/">http://ourhrmalliance.ca/regional-main-streets/</a>.</p> <p>TL;DR – I know you guys have started talking about the "donut" planning internally. We brought together these groups to try to identify some strong stakeholders and get the conversation off the ground from the very start, so that people are ready to dialogue about this in a productive way. Our proposal is essentially that the energy for suburban and rural planning for the first few years focus on building strong main streets/town centres with greater density, rapid transit, ease of business growth for small businesses, good walkability/accessibility, etc. That exercise will (hopefully) make it easier for the majority of development to occur in the more concentrated areas of our suburbs and rural areas quickly (i.e. in the next 2-3 years), rather than on green fields.</p> <p>Let me know if you guys have any questions. I wanted to ensure that you're looped into this and know that we've got a bunch of community groups excited to start working together on this. Feel free to pass it along to whomever you please!</p>	Appendix E  Our HRM Alliance position statement.  And Press Briefing
COM013 2018-02-19	Beverly W. Miller	Same content COM009 2018-02-23	

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COM014 2018-03-12	Jeff Weatherhead	<p>Thank you Carl That was very helpful.</p> <p>Hi Jeff,</p> <p>In the example on that PowerPoint slide you attached, the maximum GFAR for the site in question is 4.25 GFAR. The 3.5 GFAR refers to the maximum amount of density possible on a site without requiring a contribution of a community amenity via the density bonusing program. In this scenario – the land owner could develop a building 70,000 sq. ft in size and not provide any community amenity. However, the owner may choose to develop a building up to 85,000 sq. ft. in size (the max GFAR allowed on the site) however would need to provide a community amenity on the difference between the 2 (in this case, 15,000 sq. ft.).</p> <p>In essence – density bonusing kicks in above 3.5 GFAR. If your maximum GFAR is below that threshold, you don't have to worry about it and can only build to the GFAR level as is indicated on your lot. If the GFAR level assigned to your lot is higher than 3.5 – you can build to that maximum if and only if you provide an amenity in coordination with the density bonusing provisions.</p> <p>Also, Yes – I can confirm the maximum height remains the maximum regardless of the provision of any amenity.</p> <p>I hope this is helpful</p> <p>Thank you, Carl</p> <p>Hi Kasia and Carl: I will have a few questions I will run by you in email format.</p> <p>First/Today's is:</p> <p>The attached 1 page excerpt from the Feb 28 Halifax.ca HRM Planning Presentation to HRM Council PPT available online.</p> <p>Can you confirm for me if there is more than one maximum GFAR for any property in Regional Centre? The attached Bonus Density Sample moves between 3.5 and 4.25 GFAR scores. The difference appears to be linked to bonus density.</p>	

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		<p>Can you confirm the Maximum Height remains the maximum height regardless of any difference in potential GFAR maximum's? That was my take away from Wednesday's meeting.</p> <p>Can you walk me through why there are two GFAR's on this one page attached example to HRM Regional Council?</p>	
COM15 2018-03-08	Andrea Arbic	<p>Hi Carl, Thanks for the fast reply.</p> <p>I think a roadshow presentation would still be very useful at this point despite the fact the plan details have already been released, because it will not only provide participants with an opportunity to ask questions and get clarification on what is being proposed, but it will also provide an opportunity for discussion among participants, which open houses don't really allow. And of course it will give participants a chance to feedback to planning staff on what they've heard.</p> <p>I think what we need to give some thought to is how big we want this to be. I'm sure that the Willow Tree Group would be able to find enough people interested in taking part in a session that just focuses on the neighbourhoods immediately north and south of Quinpool and I could help with invitations and finding the venue for something like that. At the same time, I know that other members of the Coalition for Responsible Development who are located in the regional centre would also be interested in attending a session like that. But organizing something for multiple groups would be a whole other matter and I'm not sure I have the time to take something like that one, so perhaps I need to get in touch with some of the other Coalition members to see if they'd like to help pull together one bigger session, or if they'd prefer to contact you about organizing individual sessions that are more focused on their neighbourhoods.</p> <p><b>Subject:</b> RE: Re- Centre Plan Community Group Workshops</p> <p>Hi Andrea,</p> <p>Yes – we are absolutely still available to do the roadshow presentations. These presentations provide a high level summary of what is contained in the plan – similar to the summary I gave at the community workshop yesterday, and which I will be giving at our open houses. As I mentioned in my email below, in talking to the head of the Banook Area Residents Association, he for one, felt it might not be as useful after the release of the plan since the details themselves are now available to everyone, and that there would be other opportunities (ie: the</p>	

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	<p>open houses) to receive this information. We've heard this feedback from a few stakeholders. With that said, if there's still a desire for this type of presentation – we can absolutely make it happen.</p> <p>If this is the case, and you can give me a sense of attendee numbers, we can coordinate on a venue and date. If there's a space you may have access to in your community that can accommodate us, we can come to you. We don't currently have the budget to rent spaces, so the alternative would be to meet at one of our HRM offices.</p> <p>Thank you, Carl</p> <p><b>Subject:</b> RE: Re- Centre Plan Community Group Workshops</p> <p>Hi Carl,</p> <p>I'm sorry, but I'm still a bit confused. In your email below, you mention the following community engagement opportunities:</p> <ul style="list-style-type: none"><li>• Today's community stakeholder workshop</li><li>• Open houses</li><li>• Talking to HRM staff at storefront locations.</li></ul> <p>But according to the attached community engagement plan, you are also supposed to be holding "roadshow" presentations.</p> <p><b>1-C: ROADSHOW</b> <b>ROADSHOW AFTER RELEASE OF DRAFT</b></p> <p><b>WHAT</b> Municipal staff to present to various <b>stakeholder groups</b> on project-related matters.</p> <p><b>WHO</b> Industry, <b>Community Groups</b>, Business Communities, Advocacy Groups, Members of the Public</p>	
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		<p><b>WHEN</b> Middle of April - ongoing</p> <p><b>WHERE</b> Various</p> <p><b>WHY</b> Inform/respond to stakeholder groups of project status, calendar of events, educate on zoning and municipal planning framework.</p> <p><b>HOW</b></p> <ul style="list-style-type: none"> <li>▪ Provide a traveling “Roadshow” presentation that can be given to organized community/professional groups. Presentation should be created to meet the needs/interests of the group who is receiving the presentation.</li> <li>1) Project updates;</li> <li>2) High-level content of Package “A”;</li> <li>3) Details of Package “A” when requested;</li> <li>4) Next steps for the project;</li> <li>5) Education on planning frameworks and land use regulations.</li> <li>6) Attend meetings to answer questions that groups may have</li> <li>7) Centre Plan team to keep track of all correspondence in a central location.</li> </ul> <p>It would seem that the Willow Tree Group, or better yet, the members of the Coalition for Responsible Development in HRM who are located in the regional centre, are exactly the target audience for one of these roadshows. So is that something we can arrange through you? We could assist by inviting other members of the Coalition, which would allow you to kill a whole bunch of birds with one stone, so to speak ☺</p>	
COM016 2018-0319	Peggy Cameron	<p>Here is a revised version- the FHC analyzed ~60 surveys not 40 as recorded in the previous letter.</p> <p>Dear Carl and HRM Centre Planning staff, We hope you are able to review this letter relating to the Centre Plan and consider our in-put with the good intentions that we submit it.</p>	Appendix F Letter
COM017 2018-03-09	Beverly Miller	I have been following the discussion about open houses, presentations, etc. To the best of my knowledge there are several outstanding questions which need to be addressed. If the following questions have been answered publicly, my apologies. Perhaps you can simply point out your sources and I can follow up.	

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	<p><b><u>Exactly what are the specific population goals for this project and densification?</u></b> The only goals that I have seen express the end results in terms of 'units' which seems to me to be almost useless. How did HRM Planning come up with those numbers. How do you define a 'unit', is it a townhouse with a family of four or four bachelor apartments? Who is keeping track of the recently finished, under construction, or in the lineup for approval, units? I calculate that there are almost 4,000 on the peninsula already. How many more do we need?</p> <p><b><u>The second question is where have the projected population numbers come from?</u></b> Since this process started all those years ago I have seen numbers that are all over the map, most of them not even reasonable in light of past experience. This needs to be dealt with immediately. I have done some research on this and it is very clear that the Stats. Can calculations, for example, are quite different from some of the numbers that HRM Planning has been using. At any rate, let's stop talking numbers and building permits until we have a specific number from a source on which we can all agree and work from there. Based on the frantic building that has been underway on the Peninsula, I think that there is a good chance that that the number of 'units' for the next several years are already accounted for and built.</p> <p><b><u>What are the specific goals for making better use of existing infrastructure?</u></b> If one of the goals of this densification process is to make better use of infrastructure, it is important to identify which infrastructure. For example schools...all these thousands of bachelor and one bedroom apartments in process on the Peninsula, pretty much rules out families and infrastructure such as schools. There are, for example, plans over the long term to eliminate neighbourhood schools on the peninsula and have one south end and one north end elementary school. An environmental nightmare; most of the kids, especially the youngest will need car or bus transportation, for example. Walking to school will be out of the question. Does the right hand know what the left hand is doing?</p> <p><b><u>Also, is there an 'expiry date' or a re-evaluation date or does this process go on forever,</u></b> essentially letting developers build what they want to build as long as they plead 'density'. Without monitoring of the numbers of (units) How will we know how long this is to go on and under what conditions can Council say,' enough is enough' and the rest of the neighbourhoods are safe.</p> <p><b><u>Before any demolitions are approved, HRM Planning should have clear numbers of the existing residents and the rents they are paying</u></b> Before any demolitions are carried out to</p>	
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		<p>enable a newer bigger building, your staff should also have information available on the present rents on the existing units.</p> <p>How will decisions then be made as to the relative merits of demolition and re-building from a humanitarian point of view? I think of the planned demolitions and rebuilding on Robie in the Cunard Compton block. How many people live in the existing buildings now? What rents are they paying? And what are the criteria for comparing the number of tenants/families and the rents the tenants will pay with the future developments?</p> <p><b><u>If this information is not collected and used in decision making then this Centre Plan will result in draining the Peninsula (and possibly centre Dartmouth) of low income residents;</u></b> yet good planning and humanitarian considerations dictate that these are the citizens that need the best access to reliable public transportation.</p>	
COM018 2018-03-09	Jeff Weatherhead	<p>Hi Kasia and Carl: I will have a few questions I will run by you in email format.</p> <p>First/Today's is:</p> <p>The attached 1 page excerpt from the Feb 28 Halifax.ca HRM Planning Presentation to HRM Council PPT available online.</p> <p>Can you confirm for me if there is more than one maximum GFAR for any property in Regional Centre? The attached Bonus Density Sample moves between 3.5 and 4.25 GFAR scores. The difference appears to be linked to bonus density.</p> <p>Can you confirm the Maximum Height remains the maximum height regardless of any difference in potential GFAR maximum's? That was my take away from Wednesday's meeting.</p> <p>Can you walk me through why there are two GFAR's on this one page attached example to HRM Regional Council?</p>	Appendix G  Density Bonusing example
COM019 2018-03-12	Tom Arsenault	<p>Hi Carl,</p> <p>As you suggested, I'm reaching out to you via email. I'm sure you're very busy with the City Centre Plan. This is the reason I'm contacting you on the advice of Sean Audas.</p> <p>My father and I own a few properties around the Agricola and North area. We own 6 on Agricola St and 4 on Belle Aire Terrace. I grew up on Fuller Terrace. About 14 years ago my father and I built a house on Belle Aire with the intention of having a rental on one level and me on the other. At the time my father lived in the house I grew up in, Fuller Terrace, across the road from me. He has mobility issues and is on disability after being in a major car accident in</p>	

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		<p>1995. I wanted to be close to him to help him. The stairs in his house became an issue for him and we decided we would move him to the place I lived in (one level) and I would finish the basement and move there. This worked well until I started my family and needed more space.</p> <p>My sister took over in the basement to stay close to dad. This is why I'm reaching out to you. In 2011 we were informed that we weren't in compliance with having a third unit in this property, it's zoned R2. We complied and removed the 220 for the stove and the kitchen sink, we also paid the fine that was issued. We made a mistake and take responsibility for. I've been educated a bit over the years about the policies and bylaws. In 2011 we applied for a variance and canvassed the neighbourhood. The neighbours were positive for us getting a variance. We were issued a chance to go in front of a council and didn't make it to the meeting because neither my father nor myself received the letter stating the time or place of the meeting. I'm not sure what happened there. I lived in Bedford and my father lived on Belle Aire. We looked like fools because we don't show up to the meeting we asked for. Of course the variance is denied!</p> <p>I know the City Centre Plan is underway and has been for a long time. I guess what I'm asking is, when will it be complete and are there any plans to allow people like us with properties like ours to add additional units? We pride ourselves on offering affordable housing to people who would not otherwise be able to live, work and socialize in this area. I know there are bylaws that require a certain lot size, square footage of the house, parking spaces etc. There is a 16 to 20 unit building directly behind our house and two 4 unit buildings directly south of our building, there are several other multi unit properties close by.</p> <p>This has caused a great deal of stress for my family. We may end up having to sell the house. My sister who provides assistance to my father is getting frustrated because she doesn't have her own stove or kitchen sink. She has to go upstairs to my father's place to cook her own food and wash her own dishes. It's disrupting her life and I completely understand.</p> <p>I guess what I'm asking you is, is there anything that can be done to allow us the third unit in this house? I'd appreciate any help on this.</p>	
COM020 2018-03-25	Peter Ewert	<p>Thank you for your reply.</p> <p>I believe the current peninsular laws are supposed to protect us from aggressive developers. They were formed specifically</p>	

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	<p>for that reason. HRM has been using development agreements since 1996 to get around the laws. City residents unanimously voted in favour of the current laws.</p> <p>HRM acts as if these homeowners and their families no longer matter. Homeowners in low density neighbourhoods are the largest group of landowners on the Peninsula.</p> <p>Presenting 3 different growth scenarios isn't the same as doing sensitivity analysis on all three scenarios, and providing an examination of the social costs. Turner Drake aren't economists.</p> <p>Also, I heard one media comment from Turner Drake that the outflow of commercial peninsular tenants contributed to off peninsular residential sprawl.</p> <p>My sense is that it reduces commuter traffic on the Peninsula ,and has no effect on residential sprawl.</p> <p>The kind of cost benefit analysis needed here and is most recognized in the courts is 'Social cost benefit analysis'.</p> <p>Turner Drake or your other references don't seem to follow any formal Social Benefit Cost Analysis any economist with an understanding of this decision tool would use.</p> <p>Most importantly, more and more Halifax City residents are opposed to this non conforming density proposed for the City of Halifax peninsula.</p> <p>HRM staff and politicians make it very clear that they respect the wishes of development and construction interests far more than the homeowners and residents of the city.</p> <p>I hope the Province is listening to help with a peninsular development moratorium on non conforming development.</p> <p>Dear Mr. Ewert and Councillor,</p> <p>Population projections were used using the latest census data available and with the help of planning consultants at Turner Drake and Associates in Halifax. The first task was assessing the share of growth from the Regional Centre that would be anticipated. The goal of the Centre Plan is consistent with the percentage of growth experienced over the last 4 years, which on average represents 38% of the overall growth in terms of residential unit starts of the Municipality.</p>	
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	<p>Stats Canada populations were narrowed to the geography of the Regional Centre. The M1 (medium growth) projections of Stats Canada were used as these are considered the ‘safest bet’ between the high and low projections they also complete. Past population counts and past population estimates were analysed by 5 year age cohorts. These same trends were used to project future population. The trends of last 5 years were weighted more heavily to project more specifically the next 15 years of growth. With that said – we acknowledge that in both of the past 2 years, the M1 projections have been exceeded by actual population increases. If these past 2 years were the beginning of a trend, we may have a need for 18,000 units sooner than 15 years.</p> <p>Regarding your question about converting commercial buildings into residential uses, the draft plan certainly allows for this. Further, by strategically identifying areas for growth within our Centre, Corridor, Higher Order Residential, and Future Growth Node designations, this allows for Established Residential communities to retain their existing character. The Centre Plan is providing a blueprint to development. The plan will direct growth to strategically located areas in the Regional Centre, and do more to ‘plan’ the center as opposed to reacting to individual applications made. This will help retain more of the existing character of lower density residential communities within the Regional Centre.</p> <p>Finally, in selecting areas for growth in the Centre Plan, many factors were evaluated. Among them was existing water and wastewater capacity within Halifax Water infrastructure. Areas of the north Peninsula would require upgrades in order to accommodate more residential units. My understanding is that Halifax Water has made the decision to complete a sewer separation project at the same time as increasing the overall capacity available in the system in this area.</p> <p>Regarding your comments regarding cost of growth to the Municipality, you may be interested in the 2013 study on “<a href="#">Quantifying the Costs and Benefits to HRM, Residents and the Environment of Alternate Growth Scenarios</a>” This study was used as a key background technical study of the Centre Plan which informed parts of its direction. It provided a 3<sup>rd</sup> party assessment of financial impacts to the Municipality given various growth scenarios. Findings of the study indicated, <i>“For nearly all services assessed, the best distribution scenario is Scenario B in which the maximum proportion (50 per cent) of new development is located in the Regional Centre.”</i></p>	
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	<p>Other technical and background studies for the Centre Plan which may interest you can be found on the documents page of our website <a href="#">here</a>.</p> <p>Kind Regards,</p> <p>Forwarding to Carl Purvis in planning for response.</p> <p>I would appreciate it if you could have my queries sent to your planning staff for a response.</p> <p>The Centre Plan is counting on an increase in population on Halifax peninsula of 30,000 in the next 15 years.</p> <p>I have tried to understand how this projection was arrived at. It looks like HRM staff are just using a simple compound formula similar to fixed income investments.</p> <p>Further, can you confirm that transient populations, such as students, military are counted as permanent population.</p> <p>Does your staff have a formula for including transient populations in their growth projections?</p> <p>How much actual research has been done on demographic changes.</p> <p>Your transportation IMP does not account for most 'millenials' preferring telecommuting over travelling to work.</p> <p>Why is that not done?</p> <p>With commercial tenants moving off the peninsular downtown, why isn't the emphasis on reclaiming commercial office space rather than adding nonconforming developments in our low density residential city , threatening R1 family neighbourhoods?</p> <p>Correspondence from Halifax Water suggests that there is no complete plan to separate storm water and sewer on the Peninsula, but it was mentioned that these projects would depend on the Centre Plan. Why?</p> <p>Thanks for your help on my query.</p> <p>My problem with the storm water and sewer separation is that this should have been done before the treatment plants were built.</p>	
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	<p>The peninsular treatment plant was obsolete by the time it was put in service. Even the contractor said this and recommended a higher level of cleaning. Instead of separating storm and sewer, and HRM knew the cost, they went ahead and spent the money on sewerage for the suburbs after approving extending the service boundary. We ended up with urban property taxes doubling again and again.</p> <p>This Centre Plan looks like a tax grab. We have a population density of about 1100 people per sq km ...at least 200 per sq km more than is comfortable. It is absurd to allow 24 nonconforming development applications on the peninsula. I asked my own councillor Cleary to check the relation between the population density and municipal service costs ..info readily available. I showed him a simple arithmetic formula and he said he wanted a better theory??</p> <p>Municipal service costs will increase faster than property taxes collected if HRM increases density on the peninsula.</p> <p>Better to focus on increased commercial density in off peninsula areas as suburban development is still ongoing. This will at least recover some of the sewerage costs. I thought that was HRM's plan as I have seen many industrial parks being developed off peninsula, but all i hear about is this absurd Centre Plan.</p> <p>Do you really believe that counting the transient populations as part of the permanent city population is a good projection of growth?</p> <p>The downtown peninsula is losing many commercial tenants and the focus should be on conversion to residential.</p> <p>The Halifax peninsula is by far a low density city. No one in the city outside of developers wants this kind of densification. Single detached housing is the hottest market, not condos.</p> <p>I wasn't impressed when over 800 cards sent in electronically opposing the APL application were counted as one vote.</p> <p>Councillor Whitman,</p> <p>In response to the recent inquiry from Mr. Ewert, we provide the following comments.</p>	
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	<p>Halifax Water has considered the separation of sewers on the Halifax peninsula in the context of the current regulatory framework and social, economic and environmental impacts. As Mr. Ewert points out, separation of sewers on the peninsula will cost Billions and be very disruptive to residents and businesses along the way. Halifax Water has been doing selective separation where there are benefits and has started the separation in the Freshwater Brook sewershed [south end of Halifax] and is contemplating sewer separation in the north end of Halifax as part of the Centre Plan development. Sewers in the Duke/Salter area of downtown Halifax were also separated as part of the Harbour Solutions project.</p> <p>The existing treatment plants discharging to the Harbour are compliant with the new federal Wastewater System Effluent Regulations (WSER) with planned upgrades by 2040. Notwithstanding this situation, receiving water studies indicate there will be negligible impact on receiving waters with the upgrades of the Halifax and Dartmouth plants to meet the 2040 requirements from the current level of treatment. That being said, recreational activities in Halifax Harbor can take place during much of the year, based on monitoring results. As Mr. Ewert notes, the exception would be for periods when excessive rain causes combined sewer overflows into the Harbour. By design, the current system treats effluent of a volume up to 4 times average dry weather flows as originally mandated through the Harbour Solutions project. Most other municipal entities operating in similar situations treat 2-3 times average dry weather flows.</p> <p>It should be noted that combined sewers are not unique to Halifax but are prominent along the New England seaboard and along the St Lawrence River and the Great Lakes. In this regard, the current practice by Halifax Water is in line with other municipal jurisdictions operating in similar environments.</p> <p>Peter Thanks for feedback... I will ask Halifax Water CEO Carl Yates (copied) this question. <b>Subject:</b> Whitman should be asking Halifax Water when..</p> <p>they will complete storm and sewer separation on the peninsular Halifax. The HRM peninsular sewage treatment plant is obsolete and doesn't clean out a host of toxic chemicals from the sewage, yet the HRM and some environmental groups tell kids its OK to swim in the harbour.</p>	
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		<p>HRM has until 2040 to upgrade from the current obsolete system, which fails every time there is a good rain.</p> <p>This will cost billions yet no reports from HRM or Halifax Water.</p>	
COM021 2018-05-01	Patricia Cuttell	<p>Here is what we were getting at in terms of Salvation Army parking lot.</p> <p>You end up with a 5m wide tower (looks like a mini Scotia Square.)</p> <p>If it was a 5 story mid-rise, with a side yard setback and some stepbacks, you would get more density, a building that could be built, and probably something more appropriate for the historic streetscape.</p> <p>We have a couple of other site specific recommendations coming your way shortly.</p>	Appendix H  2019 Creighton Street sketch
COM022 2018-	Patricia Cuttell	<p>Hello all,</p> <p>Here is what the mid-rise building envelope for the Salvation Army parking lot site could look like.</p> <p>I've included most of the following information in the PDF, but here is a summary:</p> <ul style="list-style-type: none"> <li>- Lot Size: 30m x 37.5m (1125 sq. m)</li> <li>- Maximum Height: 20m (Mid-rise)</li> <li>- Streetline Yard: 0.5m</li> <li>- Streetline Setback (above streetwall height): 2.5m</li> <li>- Rear Stepback (above streetwall height): 6m</li> </ul> <p>Abutting Heritage Building Considerations</p> <ul style="list-style-type: none"> <li>- Streetwall height similar to that of the cornice line of the heritage building, in this case one storey (roughly 3.5m)</li> <li>- Stepbacks creating 45 degree angle from heritage building cornice line</li> </ul>	Appendix I  2019 Creighton Street (Mid-rise)
COM023 2018-05-01	Devin Casario <b>Project Consultant</b> Marc Almon	<p>Hi Carl,</p> <p>Please swap out the letter we sent yesterday with the one attached.</p>	Appendix J  Letter

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COM024 2018-04-30	<p>Patty,</p> <p>Thanks for getting back to us.</p> <p>On the response to Ed, and potential changes in general, we feel it would be best to wait for comment from all who may be interested. I understand you know the area very well and that Ed's comments may reflect a common sentiment, but since we are holding the commenting period open until the 4<sup>th</sup> we are also holding off on indicating any change until such time that we've been able to review all the materials.</p> <p>With respect to the setbacks, you are correct we want to see towers generously set back from interior property lines. This is done with an eye to tower separation and quality of residential experience in towers. We believe achieving 25m tower separation (where towers exist) is important to minimize the overall impact of tower forms on sun/shade/wind but also to assist in giving some privacy / access to light and air for tower units that face nearby towers.</p> <p>On the specifics of Gottingen/May/Maynard, we will take in that comment via this email if it isn't made in your other letter. As we mentioned on the walk, we are open to changes and very interested in getting this plan to a point where it is well supported and many voices have been heard. The idea of putting new development into tower forms has been contested throughout this process (on both sides) and there are in fact only 5 places in the Regional Centre where the current version of the plan suggests that they are possible. I expect this will be one of the issues we will eventually take to CDAC for consideration as we collect and analyse the public feedback.</p> <p>Jacob, Carl, Kyle —</p> <p>Thanks again for taking the time for a North End walkabout. That was fun. I am still compiling our notes from the meeting, which you can expect soon. There are a couple of things I want to ask about.</p> <ol style="list-style-type: none"><li>1. Have you had a chance to look at Ed's modelling with the 2.5 GFAR? Just trying to get a pulse on your response. Do you think this will be amended for the Gottingen area?</li><li>2. Creighton Street. The Salvation Army parking lot we looked at, abutting the Heritage Property — how does 114 (3) apply? A 12.5m setback on the sides and back, results in a tall, very narrow building. I could be reading this wrong, or missing something.</li></ol>
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		<p><b>Side and Rear Setbacks and Stepbacks (CEN-2, CEN-1, COR, HR-2, HR-1)</b></p> <p>114 (1) For low-rise buildings, no side or rear setbacks or stepbacks are required.</p> <p>(2) Subject to Subsection 114(4), for mid-rise buildings, no side stepbacks are required, and any portion of a building above the height of the streetwall shall have a setback of at least 6.0 metres from the rear lot line.</p> <p>(3) For high-rise buildings, any portion of a building above the height of the streetwall shall have a setback of at least 12.5 metres from any interior lot line.</p> <p>(4) Where a lot abuts an ER-3, ER-2, ER-1, MH, P, or RPK zone, the lot shall provide side and rear stepbacks, above a height of 11.0 metres, of at least:</p> <p>(a) 2.5 metres for mid-rise buildings; or  (b) 3.5 metres for high-rise buildings.</p> <p>As I'm reading it now, I think we could add a little density to Gottingen (with street wall setbacks for light penetration to the street), and even a little more density on parts of Maynard and around May Street, and make a shorted, denser building on Creighton and take out some density on the Agricola Corridor south of North, and walk away with a win-win in terms of meeting greater area density targets for the district while preserving character and attracting investment.</p>	
COM025 2018-05-03	Madeleine Waddington Aimee Gasparetto	Halifax Food Policy Alliance – Requested edits.	Appendix K Letter
COM026 2018-05-04	Kendell, Jennifer	Good morning, On behalf of Dr. Trevor Arnason and Holly Gillis, I am forwarding you Public Health's (Central Zone) response to the Centre Plan Package A materials that were released on February 23 <sup>rd</sup> , 2018. Thank you for the opportunity to participate in this process.	Appendix L Letter
COM027	Pleasant Woodside	Submission from Pleasant -Woodside Neighbourhood Association	Appendix M

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	<p>This submission duplicates what we submitted online but with a few additional comments.</p> <p>Key for our neighbourhood, the Pleasant-Woodside area, in the Centre Plan is Section 3.3 which designates Pleasant Street as a Corridor (Secondary Municipal Planning Strategy (SMPS) document. Being a "corridor" under the plan creates a challenge because, even though there may be opportunities for infill and redevelopment that serves a local area, we are foremost a thoroughfare. This makes it challenging to also be a neighbourhood. We might change the emphasis in the plan a little with some of the following ideas:</p> <p>Our hopes for new development in our area might be that:</p> <ol style="list-style-type: none"><li>1. The plan will equally encourage new development that is residential in nature not residential and commercial together, as opportunities for viable ground level commercial will become increasingly scarce in HRM because of the continued growth of business parks outside the Centre. Planning rules and GFAR values should therefore encourage some infill that is residential only enabling developers to add buildings with fewer floors.</li><li>2. HRM, or HRM in conjunction with neighbourhood residents, should develop corridor inventories consistent with the idea of complete communities, to identify commercial and business priorities for each area. What might be the main neighbourhood needs in each corridor area especially those that are not heavily commercially developed already.</li><li>3. In order to encourage walkable and commercially attractive corridors, existing sunlight exposure should not be sacrificed to height. Pleasant Street currently enjoys direct sunlight from 10 am to 4 pm each day, which is an asset to residents and developers.</li><li>4. New commercial space should encourage small businesses and start ups in terms of both space options and graduated rents. We not only need affordable housing but affordable spaces for new businesses, especially those serving a local neighbourhood. Might there be GFAR options to encourage this on corridor streets?</li><li>5. Developers should have buildings, not parking lots, front on corridor streets.</li></ol>	Letter
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	<p>6. The view of the harbour from residential buildings on Hilltop Terrace, Esson Road, Randall Street, Harvey, Cameron, Marvin, Chadwick and Renfrew should be preserved</p> <p>7. Mixed use buildings, that is buildings that offer office, work studios and retail space, as well as residential space, be encouraged. Student housing may have a place in our area too because of the presence of NSCC.</p> <p>8. Space should be provided by developers for pocket parks, public art, plazas, and outdoor eating establishments</p> <p>9. We would like the plan to encourage low rise 3-4 story wood frame construction for infill lots in corridor areas</p> <p>10. Where there is sufficient land would like to encourage low-rise, above ground, stand alone parking structures made of steel not concrete as a means of providing parking for corridor businesses and residential units. There are lots of examples of nice small scale parking garages around the globe.</p> <p>11. The Pleasant -Woodside Neighbourhood Association has submitted a Corridor Profile for Pleasant Street. It is based on our own 2017 Corridor Planning report, <i>Visioning Community: Pleasant Street</i>. We would like one or both referred to, or appended to Package A as an example in order to encourage the creation of other corridor plans. Such plans, when created with neighbourhood input could, even without the creation of additional regulations, be of value to developers.</p> <p>12. The designation of the Penhorn Lands as a growth node means that if developed within the next ten years it will compete with our aspirations for rejuvenation via residential and commercial infilling. We would like to see some incentives for infill development in existing neighbourhoods rather than the opening up of new areas.</p> <p>Thank you for all your work on the Centre Plan.</p>		
COM28 2018-05-04	Georgia S. Atkin	Dear Mr. Purvis and Mr. Richie, I am writing to provide feedback on the Centre Plan currently in development for the HRM, more specifically with regards to density bonusing. Please find attached my letter.	Appendix N Letter

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		<p>Just as some background about myself: I am an organizing member of the 'Save the Oxford' community group, which has been working to find ways of preserving the Oxford Theatre on Quinpool Road as a valuable community performance space and venue. My involvement began last autumn when I started an online petition for this cause, which has reached over 4,250 signatures as of May 4, 2018.</p>	
COM29 2018-05-04	Alan Collins	<p>To the Halifax Regional Municipality,</p> <p>We, the advocates of revitalization of the Oxford Theatre, urge council and the staff of HRM to consider the following amendments to the Centre Plan:</p> <p><b>Allow greater sections of the city to benefit from density bonuses</b></p> <p>The Centre Plan restricts the use of density bonuses to an uncompromising degree, which undermines the potential of the initiative to support much-needed cultural infrastructure and public art throughout most of the city.</p> <p>Currently the plan restricts density bonuses to properties larger than 3.5 Gross Floor Area Ratio (GFAR). This proposal prevents most of Quinpool Road and many other areas from utilizing the density bonus incentive. As most cultural institutions exist in low-rise buildings, we strongly recommend looking at ways to encourage developers to incorporate cultural and non-profit spaces in their projects which fall under 3.5 GFAR.</p> <p>Further, the present GFAR calculation penalizes open-volume spaces often associated with community and cultural spaces. Theatres and concert halls are usually multi-story spaces, as all areas within the exterior walls are included in the calculation. For example, a 4,000 square foot open space with a three-storey height would result in 8,000 sq ft of 'air space' that would be lost to potential development.<sup>[1]</sup> This is similar to the present inclusion of elevator shafts, stairwells, mechanical shafts, etc. within the GFAR included area. We propose that such spaces used for cultural and / or non-profit purposes should not have the "void" space included in the GFAR.</p> <p><b>Devoting 25% of the density bonus to cultural facilities/public art is too low</b></p> <p>Currently the Centre Plan proposes to devote 75% of the proceeds from density bonuses to affordable housing and 25% to cultural infrastructure, public art and green space.</p>	Appendix O  Picture

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	<p>The 25% figure is far too low considering the pressing need for these three priorities to transform Halifax into a creative city that inspires its citizens. Affordable housing is a vital initiative. But so is making our city a beautiful, attractive place for vibrant minds who take pride in a Halifax where art and performance can be created and enjoyed. 21<sup>st</sup> century cities that invest in the arts and their creative class thrive, period. We suggest this balance be reviewed.</p> <p><b>Pool the density bonus proceeds</b></p> <p>Limiting the density bonus proceeds to individual developments would severely restrict the use of those funds and would result in initiatives that are limited in scope and vision. Furthermore, developers are not the best advocates for cultural spaces and public art. The community is.</p> <p>We propose giving developers the option to direct density bonus proceeds to be pooled into larger funds. Those funds would be devoted to public art and cultural spaces that are championed by, and connected to, the community through some form of democratic process.</p> <p>This approach would allow not only for larger, more exciting initiatives that can have a significant impact on Halifax's neighbourhoods, it would promote civic engagement and it would allow successful proponents of particular proposals to leverage funds from federal, provincial and private sources, drawing greater investment to the city. Ideally the funds would encourage developers and local community groups to partner and work together to nurture ideas for cultural innovation throughout the city, with the best ideas winning through the democratic process, an example of such method is the long standing tradition of participatory budgeting in different HRM districts.</p> <p>Thank you for considering our feedback, and we congratulate HRM staff and councillors for all the hard work performed on the Centre Plan so far. We will be watching carefully for revisions to the Plan that protect and enhance our cultural assets.</p> <hr/> <p><a href="#">[1]</a> A three-story building with a 4,000 sq ft imprint would typically have 12,000 sq ft of usable space (<math>3 \times 4,000 = 12,000</math>). However, with a building comprised of a large open space, effectively 8,000 sq ft would be not included in the present GFAR calculations.</p> <p><b>FOOTNOTE:</b></p> <p>I am writing on behalf of Save the Oxford community group who are working to see the iconic Oxford Theatre building on Quinpool Road preserved as a Performing Arts Centre for music,</p>	
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		comedy and theatre festivals which will benefit local businesses and act as a tourist attraction to bring people into the area, similar to what the new Central Library has done for Spring Garden Road. We have put out a petition on Change.org to Save The Oxford Theatre and have so far received over 4,250 signatures	
COM030 2018-05-04	Sue LaPierre  <b>United Way Halifax</b> <a href="http://www.unitedwayhalifax.ca">www.unitedwayhalifax.ca</a>	On behalf of United Way Halifax in please accept this response to the Centre Plan “Package A” materials and their relationship to the issues of poverty, housing and inclusion.  As always, we value the hard work and spirit of partnership we witness at HRM.	Appendix P  Letter
COM31 2018-05-04	<b>Sarah MacDonald</b>	IWK Health Centre. Please see attached package A feedback. Thank you for the opportunity.	Appendix Q  Letter
COM32 2018-05-04	Pat Whitman & Chris Annand	<b>Subject:</b> Centre Plan Comments  Attached are comments from Park to Park Community Association on the Centre Plan.	Appendix R  Letter
COM33 2018-05-04	Comments by Patty Cuttell Busby, Andrew Murphy, Ed Edelstein — North End Business Association notes by Kyle Miller.	<ol style="list-style-type: none"> <li>1. Falkland St. is a heritage streetscape. How can it be protected?</li> <li>2. Should the streetline yards depend on building typology? (I.e., require less of a setback for a smaller building?)</li> <li>3. SMPS needs a policy on consolidation — what happens to dissimilar GFARs, heights, and zones when lots are consolidated?</li> <li>4. Should remove Falkland St. from the Gottingen CEN. Should just be an HCD.</li> <li>5. Definition of “Local Commercial” — as permitted in CEN-1 — should be changed/clarified so that office and fitness centres, yoga studios, etc. are definitely included. (Re: flower shop at Creighton &amp; Falkland)</li> </ol>	

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	<ul style="list-style-type: none"><li>6. Current definition of medical clinic allows needle exchanges, etc. widely. Baltimore has a model that maintains services but manages issues. NEBA recommends splitting definition into two: allowing needle exchange in CEN-2, but not CEN-1. Sharps boxes etc. are HRM's responsibility.</li><li>7. Halfway houses — history of murders, etc. Some nervousness about these in the Gottingen area.</li><li>8. Office uses should be permitted in pedestrian-oriented commercial streets.</li><li>9. 2019 Creighton St. (vacant lot behind Salvation Army) — what would a 10-storey building actually look like on that lot? Does the Design Manual require more than a 3.5-metre setback when abutting heritage properties?</li><li>10. For Andrew Murphy's vacant lot behind the Theatre Lofts, he'd like to see a rule similar to Schmidville's "vacant lot rule"</li><li>11. Double-check definition of "butcher" against what Ratinaud is doing</li><li>12. Ed Edelstein wants CEN-2 flexibility for his building on Gottingen, including the ability to do live-work, and up to 5.0 GFAR</li><li>13. Ed would benefit from GFAR and fewer restrictions e.g. height. He likes removing volume to create light wells, but is penalized for that without a pure GFAR system.</li><li>14. Ed Edelstein: Gottingen benefits from its current 50-foot height limit, full-coverage, no-setbacks, any-use rules. "That's why it's developing."</li><li>15. Andrew suggests: don't count ground floors in height limits. Allow penthouses. (GFAR solves both of these.)</li><li>16. Building code and economics will cap a 5.0 GFAR building to six storeys.</li><li>17. Creighton south of Cunard St. should be CEN-1 — no heritage there. (– Andrew Murphy)</li></ul>	
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		<p>18. For Agricola, check out San Francisco's "formula retail ordinance" — a tool for managing/regulating chain retail/restaurants.</p> <p>19. Schmidville: Andrew Murphy likes the way we provide extra rights for existing buildings. Could apply this to Agricola as well.</p> <p>20. Does the HRM Charter allow us to phase-in tax increases over time?</p>	
COM034 2018-05-04	Frank Palermo	Here are some comments on the Centre Plan. I'm not sure if you are the right person to get the submission. I did try to bring it to the Storefront location on George St , but it was closed.	Appendix S Letter
COM035	Jenny Lugar  Sustainable Cities Coordinator  <a href="mailto:ecologyaction.ca">ecologyaction.ca</a>	Hi Jacob, Please find attached the comment from Ecology Action Centre on Package A of the Centre Plan draft. I appreciate all the hard work your team has put in and your perseverance through this consultation phase. I had some really engaged volunteers helping me out with this comment, which in and of itself is a win - more people thinking about planning, design and growth, eh?	Appendix T Document
COM036	Howard Ramos	Press release on the hotspots of Halifax Inequality	Appendix U Document



## Healthy Food Retail for Community Food Security

Few Halifax area residents are eating enough vegetables and fruits on a daily basis. Only 27% of residents over the age of 12 are eating the minimum recommended amount of vegetables and fruits every day as a foundation for health<sup>1</sup>. There are many reasons why an individual might not eat enough vegetables and fruits, but access to healthy food<sup>1</sup> is an important starting place.

Access to healthy food is influenced by many factors such as the:

- **built environment**, including transportation systems, neighbourhood design, and location of food stores.
- **food retail environment**, including availability and accessibility of places to buy food and the types of foods offered at these locations.
- **community food assets**, such as places where people can grow, prepare, share, receive, or learn about food.
- **social and economic factors**, such as health status, income, housing, and transportation.

A network of places to get food that provide healthy options, such as grocery stores, convenience stores, restaurants, and speciality food stores (e.g., bakeries), can increase the accessibility and availability of healthy food. By improving the accessibility of all residents to healthy food, we can improve our health and create healthy and liveable neighbourhoods.

### How Halifax can support Healthy Food Retail?

[Halifax Municipality's Regional Plan](#) includes an objective to “design communities that promote community food security.”

The municipality can play a role in shaping healthy food retail through zoning and community plans, regulations and policies, and support of economic activities related to food retail. It can bring together different groups and organizations to encourage creative ways to improve food access. Some of the changes may require provincial support, so Halifax Municipality will need to work in partnership with the Province of Nova Scotia.

*The City of Vancouver uses a “food systems checklist” when city staff review proposed decisions about new developments, zoning, and community plans. This helps the City of Vancouver understand how each proposal or plan could shape community food security.*

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<sup>1</sup> For the purposes of this document, **healthy food** includes foods in [Canada's Food Guide](#) that are **low** in sodium, sugar and saturated fat and **unhealthy food** includes foods **high** in sodium, sugar, and saturated fat, such as sugar sweetened beverages, cookies, cakes or other sweets, potato chips etc.

# Appendix A

## RECOMMENDATION #1: Assess the food retail environment

We first need to understand how residents access food in Halifax. Neighbourhoods vary in the number and quality of food retail outlets. Individuals' food experiences vary based on their location and access to transportation and income, among other factors.

- 1.1 Work with stakeholders to better understand the food retail environment and identify gaps and opportunities for healthy food retail across the Halifax region.

## RECOMMENDATION #2: Promote healthy food retail

Land-use planning can influence the quality and accessibility of healthy food within the Halifax region by taking into account the different kinds of food retail outlets, the availability and promotion of healthy food within them, and how people get there.

- 2.1 Review and revise zoning by-laws and plans to improve food distribution and access.
  - Ensure that regulations enable and encourage grocery stores and other healthy food retail outlets, requiring them in neighbourhoods with poor access and availability of healthy food.
  - Work with other levels of government to permit and reduce barriers to healthy food retail models such as farmers' markets, mobile food markets, and community markets.
  - Update home-based business provisions to enable small-scale food enterprises.
  - Facilitate access to food retail supports, such as food processing and storage.
- 2.2 Adopt a guiding principle of equitable access to fresh and healthy food (locally produced, as available) and create a review process to ensure that access to healthy food is considered in community planning, development applications, subdivisions, planning amendments, and other planning initiatives.
- 2.3 Adopt and implement policies to ensure that all municipal facilities provide healthy food options and limit the sale of unhealthy food and beverages
- 2.4 Adopt and implement a policy to limit food and beverage marketing to children and reduce the influence of food companies on food preferences.
  - Restrict all food and beverage marketing in municipal settings, such as recreation centres, transit stations, and libraries.
  - Restrict sponsorship of municipal facilities or events by food and beverage companies selling unhealthy food.



## RECOMMENDATION #3: Support creative models of healthy food retail

Community organizations and food entrepreneurs are finding new ways of bringing healthy and fresh food to residents. These include initiatives like community food markets, mobile produce stands, healthy corner stores, and pop-up farmers markets.



# Appendix A

- 3.1 Investigate options for Halifax to support healthy food retail initiatives and pursue additional legislative authority, if needed.
- 3.2 Promote the development of food businesses through business supports<sup>2</sup>, such as property tax incentives, training, modified licensing and permit processes.
- 3.3 Develop programs that encourage access to healthy food in places where people live, work, learn and play, such as corner stores and transit locations.
- 3.4 Provide continued support for the [Halifax Mobile Food Market](#) and encourage new partnerships that work with communities to address neighbourhood food access and use existing resources to promote health.

## REFERENCES

- i. Halifax Food Policy Alliance. (2014). Food Counts: Halifax Food Assessment.  
<https://halifaxfoodpolicy.files.wordpress.com/2015/03/foodcounts-assessment-web-fin4.pdf>

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<sup>2</sup> The City of Toronto helped to create, and continues to support, Food Starter (<http://foodstarter.ca>), a non-profit that provides access to shared food production equipment, business advice and training to help build great food businesses.

[View this email in your browser](#)

## Appendix B

# Banook Area Residents Association Newsletter

Please provide your feedback on this draft set of concerns for Centre Plan:

Banook Area Residents Association (BARA) has been a strong promoter of Centre Plan. BARA was instrumental in Grahams Corner being designated a Corridor under the new Centre Plan. Centre Plan will speed up development opportunities and provide development by design review guidelines for commercial ground floor, walk-up, and residential apartments of 4 to 6 storeys. To be competitive in attracting investment, our area needs to have a streamline development process for positive growth and affordable apartment housing.

HRM Planning has been engaged for over four years in a complex process to arrive at Centre Plan Package "A". Centre Plan – Package "A" is made up of a Secondary Municipal Planning Strategy (SMPS) (to supplement the existing Regional Municipal Planning Strategy), Design Manual – Appendix 1 to the SMPS, and Land Use Bylaws.

Of the several hundreds of pages making up Centre Plan Package "A", BARA focused on Grahams Corner, Dartmouth and came up with 5 areas of concern, limited to 5-10 pages of the entire document. We see Centre Plan Package "A" as a strong success by HRM Planning for our area, but requiring key changes on all 5 points. We think these principles will benefit each of the Centre and Corridors in Dartmouth. There is a wider diversity of residential/commercial types on the peninsula and the below concerns may not adequately address concerns in those areas.

### CENTRE PLAN – PACKAGE "A" – CHANGES REQUIRED

1. PROPOSED GOVERNANCE/COMMUNITY COUNCIL CHANGES
2. LAKE BANOOK PROTECTIONS
3. DESIGN MANUAL & LUB (only 5 pages out of several hundred – but requires custom face time in our business corridors) - HARM TO DARTMOUTH ECONOMY

4. FAR/GFAR – CORRIDORS – SPLIT RESIDENTIAL/COMMERCIAL COMPONENT:
5. AFFORDABLE HOUSING POLICY

#### GOVERNANCE:

The WORST SUGGESTION in Package A is the notion of removing Dartmouth from its traditional Harbour East Community Council and lumping us in with Peninsular Halifax. Our Dartmouth voices will be drowned out by the larger scale HFX Downtown business community. DO NOT CHANGE the Community Council Governance Model. Similar impact is the request to have Dartmouth adopt the Halifax Planning Advisory Committee – Dartmouth should have its own Dartmouth Planning Advisory Committee (even though there will be a steep decline in Development Agreements under the new system). Lastly, Dartmouth needs a VETO or 50% vote share quorum on the Design Review Committee for any Dartmouth Sites.

#### LAKE BANOOK:

SMPS s.3.4.1, Policy 22, 23, 24 and MAP 3: The YMCA Property off Brookdale Crescent is designated as Higher Order Residential-2, so this site will see potential future residential and/or commercial development, subject to the 35 foot height restriction.

SMPS s.4.1, Policy 58 allows for “certain exceptions to maximum heights... such as certain architectural features, solar panels and mechanical equipment. Minor relaxation to maximum heights may be considered through an amendment to the Land Use Bylaw, if the maximum GFAR is not exceeded.”

MISSING FROM Design Manual Article 5 Site Plan Variations – particularly Section 5.3 – MUST ADD “e. does not violate Lake Banook height restriction zone; and f. does not adversely impact heritage conservation districts and cultural landscapes.”

#### DESIGN MANUAL – Appendix “1” and Land Use Bylaw (LUB):

DESIGN MANUAL – Appendix “1” and Land Use Bylaw (LUB) were first released this month and is an extension of Downtown (Halifax) by Design. At over \$400/sqm, the Design Requirements are affordable.

Wyse Road (\$80/sqm), Pleasant Street (\$80/sqm) and Graham Corner (\$240/sqm) Corridors will not support the same Design Criteria as \$400/sqm, and this new regulation will cripple our local businesses.

Some practical examples:

1. Lawrence Street Apartments – 3 X 35 unit Apartments built in the 1970’s.  
Extremely good value affordable housing, one of three buildings having recently upgraded windows (Vinyl).
2. NAPA Auto – repurposed IGA store (sustainable development) – looks great, provides local jobs, products and services, (painted Stuccoed rigid insulation

and vinyl windows).

3. Yuille's Auto Works – repurposed gas station – community scaled service, local jobs, looks great (tinted office windows – reduces heat loading from summer sun)

These examples would be grandfathered under the Centre Plan, but would be prohibited for new or renovated works based on Design materials: Vinyl Windows, stucco cladding, and tinted windows.

Not prohibited is raw concrete, painted or unpainted, or other similar industrial low end finishes. (In HRM Downtown, at \$400/sqm market forces would control to prohibit this downscaled choice – not in some areas for Dartmouth.

Tenants in the one renovated Lawrence Street Apartment with new windows appreciate the quality improvements. However, the tenants in the other two buildings would not be able to get window replacements until the cost of higher commercial grade metal windows could be budgeted in. Sometimes, the \$400/sqm design materials will force site redevelopment instead of sustainable and affordable refurbishment in our \$80 to \$240/sqm areas.

The Design Manual assumes a downtown “Grid Block Pattern” and “Reduced Demand for Automobiles and Parking Spaces”. Public transit is a part of Dartmouth life, and so are local shops and services. However, the majority of the population over 50 years old is dependent on their automobiles for shopping, commuting to work, health care, parenting, and leisure. Not respecting this need for our Dartmouth Corridors will be economic suicide.

The structure of the Design Manual is EXCELLENT. The details (contained in 5 to 10 pages out of several hundred pages) are TERRIBLE and IGNORE DARTMOUTH, rolling out DOWNTOWN HALIFAX into our communities. The details need to be replaced or scaled to recognize:

1. DARTMOUTH's \$80-240/sqm economic range;
2. NEED for Autos and Parking Spaces; and
3. “Strip Pattern” instead of a “Grid Pattern” for our Corridors – Automobile oriented
4. Custom leverage for the KEY ANCHOR's existing within each corridor, allowing for expansion and renovation for existing uses (not just grandfathering, but growth oriented)
5. Add Broadcast use to all zones – this is federal jurisdiction and cannot be restricted by Municipality (ultra Vires)
6. Remove Pawn Shop from permitted use at Grahams Corner – highlights the need to custom differentiate character and strengths for each Corridor
7. Ensure Wholesale and Auto Repair are permitted for Graham's Corner Anchor tenants

**ADD CUSTOM PROCESS - INVENTORY of WINNING ANCHORS – recognize and support our existing ANCHOR AND SECONDARY Businesses in the Design Manual – this is a missed opportunity to be a cheerleader to our existing businesses. HRM Planning needs to take the time for each Centre and Corridor to sit down and customize each set of existing built form and business/residential mix:**

1. Chain Grocery Store = KEY ANCHOR
2. Federal or Provincial Gov't Office = KEY ANCHOR (If the Province wants to get behind this Centre Plan model – put their money, offices and jobs where their mouths are – in our Corridors a real game changer)
3. Educational Institution = KEY ANCHOR
4. Bank/Credit Union = KEY ANCHOR
5. Medical Clinic = KEY ANCHOR
6. EVERY Business with over 10 years on Premise and/or over 5 full time employees = KEY ANCHOR
7. Existing Apartment/Condo over 15 units = KEY ANCHOR
8. Hotel over 15 units = KEY ANCHOR
9. Restaurant/Coffee/Donut Shop = Secondary Tenant
10. Personal Services = Secondary Tenant
11. Daycare = Secondary Tenant
12. Retail, Other = Secondary Tenant
13. Service Station = Secondary Tenant

The TERRIBLE (off the rack) DETAILS of the Design Manual and LUB need to be replaced with corridor specific inventories based on the existing built form and anchor tenants. DON'T GO CHANGING DARTMOUTH INTO DOWNTOWN HALIFAX - that is not sustainable or competitive for us. BUILD ON WHO AND WHAT MAKES DARTMOUTH GREAT.

#### FAR/GFAR – CORRIDORS – SPLIT RESIDENTIAL/COMMERCIAL COMPONENT:

LUB, Sch 11 - GFAR in Corridors should have a split Commercial/Residential component, so a minimum of stated GFAR scores is commercial for ground floor to enhance walkability in the Corridor. If a Developer goes with residential only (even in the early stages of a building's life), they should lose a 1.0 value of the GFAR. This will have developments match the true goal of a walkable Corridor.

#### AFFORDABLE HOUSING - FAR/GFAR (Centre Plan, Section 10.6, Policies 119 and 120):

**AFFORDABLE APARTMENTS** fit different lives and most people at some stage of life: Students, Young Families, Singles, Separated, Accessibility Requirements, and Seniors. Please take the time to review this as it will impact your local community in the long term.

**MIXING COMMERCIAL CORRIDORS with AFFORDABLE APARTMENTS** increases housing options, reduces the need for automobiles, and gives walkable access to services and local jobs.

Banook Area Residents Association neither endorses nor rejects GFAR for Bonus Density. Our cost/sqm makes the calculation less relevant. BARA does not believe the GFAR Bonus Density link to affordable housing will yield effective long term results for HRM. The most effective long term results for affordable housing will come from 3-4 storey wood frame construction apartments in Corridors with KEY ANCHORS with low cost/sqm. Until HRM directs a policy shift to this type of density infill, which could be achieved by diverting the bonus density award in \$400/sqm areas to subsidize quality construction of affordable housing in our corridors, then we are only compounding the problem kicking the problem down the road by providing short term (15 year limit) units in high cost rent areas.

The federal government is providing financial incentive to HRM for Affordable Housing construction. Hopefully this is not a lost opportunity for material long term growth in affordable housing for 3-4 storey wood frame construction, but instead diverted to part of the gentrified short term affordable housing units that help enable the construction of intense densification of South End Halifax. Dartmouth wants stimulus to help provide reasonable densification and residents of South End want moderation on densification efforts. Hopefully a strong hand by HRM Council and the Director of Planning on affordable housing policy, including sign off for any federal funding can strike the right balance.

To effect this change, Policies 119 and 120 need to be changed to allow for the affordable housing benefit to be optimized at a site elsewhere in Regional Centre. It is most effective to provide funds to housing solutions that cater to a lower income or affordable housing space within the market. Or the funds could be directed to KEY ANCHOR amenities needed for low income areas. This is a missed opportunity to address needs imbalances within Regional Centre.



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February 20, 2018

Members of the Community Design Review Committee  
Halifax Regional Municipality  
Halifax, NS

Re: Centre Plan Review

We, Park to Park attended the January 16, 2018 Council meeting as part of our continuing interest in seeing the Centre plan through to fruition.

We were particularly interested in the amendment put forward by Councillor Mason, his rationale and the ensuing discussion including the comments by Ms. Denty.

We believe his recommendation to allow the south end area from South Park Street East and South Street south to Inglis Street to have certain locations, possibly 20, classified as Higher Order Residential (HOR) rather than an area of contiguous Established Residential (ER) zoning has some validity given the current mixed housing neighbourhood. We were encouraged by Ms. Denty's comments that the Centre Plan was a work in progress and that she was willing to re-examine those sites to allow the proposed revitalization to occur, recognizing the current non-unified form of land use.

In light of the amendment and the willingness by staff and Council to consider non-contiguous zoning in the South end, we Park to Park would like to bring back our earlier request of November 30<sup>th</sup>, 2016, a letter to Jacob Ritchie, where we requested a similar approach of mixed HOR and ER designations for Wellington Street. In our rationale we had noted that Tower Rd was essentially being treated this way. We would suggest that the west side of Wellington Street as identified in the Centre Plan should remain HOR while the east side would be ER with the exception of the then non-conforming Wellington South, a 5 storey condo building on the east side of Wellington Street. This would avoid the prospect of a tunnel of six multi-storied buildings on both sides of this short two block neighbourhood street.

We believe that our request fits into the stated policy objectives particularly protecting residential neighbourhoods and ensuring a balanced distribution of housing especially on a small



side street like Wellington Street.

We ask that you consider this request and recommend that the proposed zoning on Wellington Street be amended before the Centre Plan is approved.

Sincerely,

Pat Whitman, Chair  
Chris Annand, Co-Chair  
For Park to Park Community Association

Cc: Deputy Mayor Wayne Mason, Halifax South Downtown Councillor  
Kelly Denty, Acting Director, Planning & Development  
Carl Purvis, Planning Application Program Manager  
[PlanHalifax@halifax.ca](mailto:PlanHalifax@halifax.ca)





2016 October 18

### CACs for future development in Halifax

Thanks to the Willow Tree Community Group, many Haligonians are now talking about ‘lift’ and it has nothing to do with elevators or your neighbour giving you a ride when your car breaks down.

In the real estate business ‘lift’ refers to the difference between the existing real estate value of a property based on its zoning and the extra value the developer gets if Council changes the rules and grants a development permit. There have been 179 development agreements, many with strong citizen opposition approved by Council in HRM since 2010; that’s a lot of ‘lift’.

Based on the fact that a change in permitted use or an increase in density generally boosts the value of the developer’s land, some Canadian cities (and this seems to be a trend particularly on the west coast) require developers who apply for a development agreement to pay what is known as a Community Amenity Contribution (CAC) based on the increased value of the land. These CACs are handled differently by municipalities. Some charge a fee based on each additional unit. In Peachland, B.C., for example, it is \$1877.40 /residential unit; in Ladysmith it is \$1000). For some developments in Victoria the Community Amenity Contribution is based on a percentage of the additional value of the land which can go as high as 75% as determined by an independent consultant. Vancouver, sets a per sq. metre charge, differing between residential and commercial properties, based on the increase in size granted by the rezoning.

Spending this money is not at the discretion of the developer, money from most of these charges must be paid directly to the municipality and the Council is then able to spend the money to create the ‘amenities’ most needed by its citizens: affordable housing, parks and recreation, or infrastructure, for example.

The Willow Tree Group analyzed the ‘lift’ granted to developers by Council of three projects in Halifax: 1034-1056 Wellington Street (\$4.6 million), the development at Coburg and Seymour (\$2 million), and the mammoth 29 story proposal for the corner of Quinpool and Robie (\$7.1 million), for a total of almost \$14 million. Just imagine if HRM Council had a portion of that \$14 million to spend where it is needed most to improve the lives of the people who live here.

It looks like the new HRM Council will be scrutinizing requests for development agreements, especially those where there is stiff opposition from the community, more closely. Community Amenity Contributions should be one result and this would be a positive step, not only for the citizens, but toward creating the ‘level playing field’ that so many developers say they want.

Beverly W. Miller, Halifax



## The Halifax Region Mainstreets Plan

Position Statement — January 9, 2017

The success of communities in the Halifax Regional Municipality depends on having updated, modern local plans to ensure development contributes to the aspirations of residents and business. Long-term strategic goals can only be achieved if communities have updated/current rules for how they grow.

Some sixty per cent of HRM's development occurs outside our regional centre, and yet, plans for most of the municipality are decades old. In the twenty years since amalgamation, only two local plans have been enacted for rural areas. This region can only prosper, and amalgamation will only truly be complete, once all communities have a voice in shaping their own future.

### Proposal

Our HRM Alliance and the groups supporting this statement call on HRM to develop two plans: one for every suburban community in the region, and another for every major rural community. Instead of starting from scratch for each, this common planning exercise would allow the municipality to get the basics done, and then to focus on what is distinctive and important in each. The goal is not a one-size-fits-all planning approach, but to reduce redundancy specifically to free up the resources necessary to ensure each community gets a tailor-made plan that matches their needs and aspirations.

We believe these plans should include design guidelines and financial strategies to prioritize the development of great local main streets for every major growth centre. Such main streets would contribute to the success of rural and suburban communities in multiple ways:

- Support local business and economic development.
- Contribute to tourism by offering unique destinations to shop and spend time.
- Improve the effectiveness of transit by putting more homes and business on existing lines.
- Support active transportation and recreation and increase access to healthy food.
- Lower costs for low-income residents by improving access to transit, stores and services.
- Reduce transportation-related CO<sub>2</sub> emissions.
- Improve the region's financial sustainability by growing the commercial taxbase.
- Reduce the tax burden, by encouraging development on existing infrastructure.
- Promote aging in place and intergenerational social capital.
- Further develop local identity and pride.

These plans would also allow the boundaries of Growth Centres to be redrawn to suit development goals and to avoid undermining high-value natural lands identified in the Green Network Plan.

The Halifax Regional Municipality can become a network of successful, unique communities, connected by every mode of transportation possible. To get there, we need clear plans that will ensure the millions of dollars invested in development yearly consistently contribute to clear common goals for a prosperous, sustainable future.

Jenny Lugar,  
Our HRM Alliance Coordinator



[REDACTED]

[REDACTED]

[www.ourhrmalliance.ca](http://www.ourhrmalliance.ca)

## **Groups supporting this position statement:**

- Affordable Housing Association of Nova Scotia
- CARP Nova Scotia
- Halifax Cycling Coalition
- It's More Than Buses
- Main Street Dartmouth Community Improvement District
- Sackville Business Commission
- Spryfield Community Association
- Spryfield Business Commission
- United Way
- Walk n' Roll Halifax



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[www.ourhrmalliance.ca](http://www.ourhrmalliance.ca)

## Press Conference Agenda and Briefing January 9, 2017

### Eleven groups call on Halifax to plan suburban and rural communities

Since amalgamation, few communities have had their local plans updated. Eleven groups have come together to propose a solution to speed up the process, so that suburban and rural communities throughout the region can establish high-quality local mainstreets. The proposal is to establish two plans, one for all major rural communities, and one for all suburban communities. By doing many plans at once, those aspects that are similar can be completed at once, freeing up resources for staff to tailor each plan for what is specific to each community.

#### Participating groups:

- Affordable Housing Association of Nova Scotia, CARP Nova Scotia, Halifax Cycling Coalition, It's More Than Buses, Main Street Dartmouth Community Improvement District, Our HRM Alliance, Sackville Business Commission, Spryfield Community Association, Spryfield Business Commission, United Way, Walk n' Roll Halifax.

#### Agenda:

**10:05** – Speakers will address the significance of local plans for the environment, business, community, affordability, and health.

- **Jenny Lugar, Our HRM Alliance Coordinator.** Introductory comments and environmental issues.  
902.478.1879. [REDACTED]
- **Bruce Holland, Executive Director, Spryfield Business Commission.** The importance of an updated plan for business and the community.
- **Claudia Jahn, Program Director, Affordable Housing Association of Nova Scotia.** Why local planning is critical for keeping living-costs low and access to jobs high for low-income residents. [REDACTED]
- **Catherine Droebeck, Physical Activity Coordinator, United Way and Try Do.** The role of local planning in creating healthy communities. [REDACTED]

**10:25** – Presentation wraps up. Speakers will be available for interviews.

#### Background

- The Centre Plan sets a target of having 40% of growth happen in the Regional Centre, meaning 60% of growth will happen in suburban and rural communities.
- Spryfield has not had its plan updated since 1978. Only two rural communities, Fall River and Tantallon, have had local plan updates since amalgamation.
- For most of Spryfield, many proposed businesses cannot open without amending the land use by-law, due to out-of-date land-use restrictions. It can take well over a year for the city to process a plan amendment.



"for the use of the inhabitants of the town of Halifax as Common forever" (1763-2013)

March 16, 2018

Dear Carl and Centre Plan staff,

Based on our experience at the recent Centre Plan focus group meeting in Dartmouth as well as our Halifax Common Master Plan meetings we are writing to ask that you consider ways to improve public participation in both of these processes.

Of broad concern, beyond the specifics of a single session we acknowledge that it is difficult for everyone to try and not view a public discussion through their preconceived ideas. That said, informed but countervailing ideas presented by the public are sometimes met by staff with the stern repetition of logic, or indeed incorrect assertions. These may be reasonable logics for the course chosen by staff but we are not beginning with an open field. Direct challenge to stated directions leads to stiffening. Direct questions are not being addressed.

In response to a draft of this letter that was circulated for comment, someone who is unknown to FHC but who was in attendance commented: "[I found at the last meeting on one of the tables that I joined that the staff person was quite defensive and argued strongly for the position put forward in the report. I had to strongly remind him that the prime purpose of seeking input was to listen.](#)" This is obviously not the way to approach the public. We understand time constraints but we need to approach discussions carefully with the full measure of time required. City-building planning requires study, listening & reflection.

Community groups such as FHC are citizen based, volunteer and work for free. Something needs to happen to open up and make public the flow of information. To this point, months into the process, discussion and information flow are completely controlled by staff, and despite the list of meetings that have taken place with respect to the Centre Plan most citizens outside of staff do not have the vaguest idea of what the public as a whole is thinking and saying or how the Centre Plan is responding.

Another comment comes from a second person that FHC does not know but who attended the Dartmouth meeting. They raised the point that "public consultation process is not the same as public engagement". In consultation, government asks for ideas.

Citizens, community organizations and the business sector make recommendations. Government makes the final decisions without acting on the suggested solutions. A public engagement process is one where all parties contribute to finding solutions through careful dialogue and thoughtful learning and then decide together what needs to be done. There can be many solutions and some of them may be very different than what any party started out believing.

Yet another participant suggested...there is a huge literature and body of research on public consultation and public engagement or more generally considered as public participation none, of which is reflected in the plan. It seems that the design manual may be the place for an overview of some basic good practice considerations. Consultation or engagement is as much a design issue as is set backs and landscaping. Aspirations and goals should be in the plan.

- Open public meetings and what constitutes a "public meeting"
- Other kinds of consultation meetings
- Invitation only public meetings (transparent but not open)
- Weighing of individual comments (are the voices of residents most affected to be valued more?)
- Meeting notice good practices
- Consultation before building design by developers
- Status of neighbourhood groups in the consultation processes (and what criteria or standards might they be expected to meet - some cities have their own neighbourhood organization templates)

Of narrower focus that our concerns about public participation stated thus far we submit a list below, amended with the help of others in attendance at the meeting, with the intent to improve the specifics relating to the process for the meetings.

- Please provide large format maps in colour of the proposed zoning for reference-not having the physical maps available makes the exercise too abstract.
- Please develop 3-D modelling showing the cumulative impact of increased height limits in the various targeted growth centres, corridors etc. HRM did this when it presented HRMbyDesign to Council. It is an important visual tool for the public and the planning staff. Heritage Trust helped purchase a programme for HRM 8-10 years ago for this purpose-no doubt the technology has improved!
- Please schedule 30 minutes for general discussion or questions at the beginning and the end of the workshop. Although time is precious this is important for learning, clarification and can develop integrated ideas rather than silo-thought that the themed tables produce and save time in the end.
- To ensure good written notes so important items aren't missed or misinterpreted or significant subtleties not understood, etc. we suggest that the last few minutes of any meeting or discussion be used to not just read the notes but to check for

omissions and review the takeaways. We also suggest that where possible notes be taken on visible large format sheets to capture discussions, a standard method of recording public meetings notes.

- Can a record of the HRM reportage be sent to those in attendance so they can add any missed comments? Some of the note takers at last week's meeting were excellent but some did not record anything-this would help ensure the best ideas and suggestions are fully captured.
- Can you please circulate the names, organizations and contact information for those in attendance at the advanced workshops so that we know who has been chosen and may suggest groups that have been omitted but should be informed?

In December at the request of Councilor Lindell Smith the volunteer Willow Tree Group prepared a paper with recommendations: The Role of Public Consultation in Halifax's Planning Processes <https://willowtreehalifax.wordpress.com/public-consultation/>. Especially striking to us is the instruction for citizen participation within HRM's own Halifax Municipal Planning Strategy.

In March FHC undertook a paper survey of some streets near the Halifax Common to seek residents' input for the Halifax Common Master Plan and to help the Master Plan process. Within a two week timeframe we received sixty+ replies, analyzed the information and submitted it to the consultants. This was a minimal effort to begin to understand the difference between two groups; those who live near and those who live far from the area being planned for. This understanding of local use is critical to the planning process. It helps the exercise to become more nuanced and constructive, and overcome the misperception that citizens are NIMBY. There is not a requirement for one plan solution nor does such a planning formula exist.

We hope you will take the time to carefully review this letter and that paper. We offer it with the best possible intention of having a good outcome for all with respect to the both the Centre Plan and the Halifax Common Master Plan.

Thank you,

*Peggy Cameron & Bev Miller  
Co-chairs, Friends of Halifax Common*

CC- HRM Masterplan staff, FHC executive, FHC Members

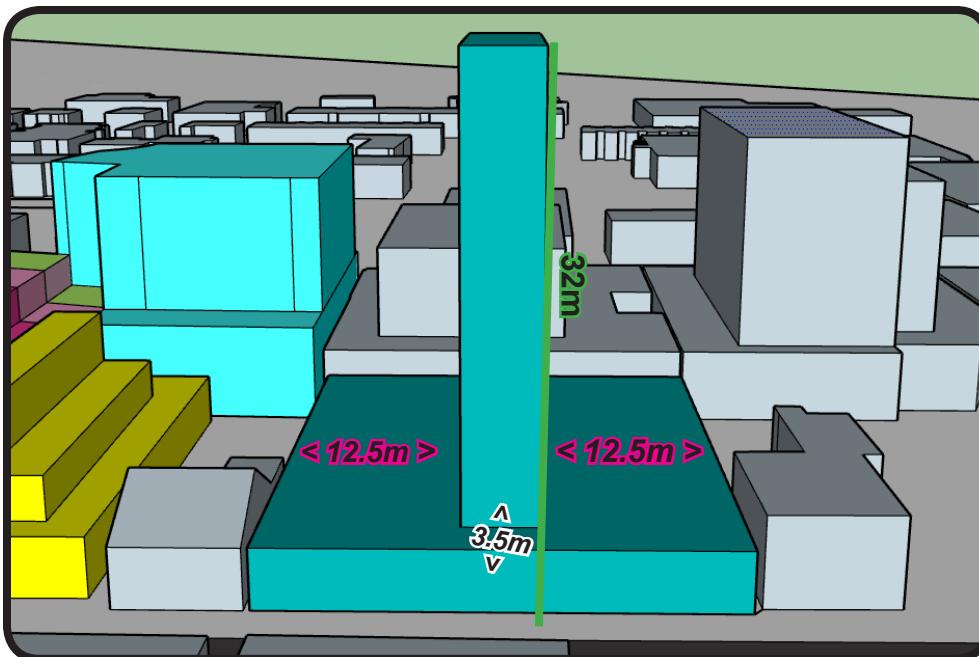
# Density Bonusing Example

An Application is Made for a Development on Quinpool Road with the following Characteristics:

Site Size	20,000 sq. ft. (1,858 sq. m)
Maximum Height	26 Metres
Maximum Density	4.25 GFAR
Maximum Buildable Square Footage Pre-Bonus	$20,000 \times 3.5 \text{ GFAR}$ ← = 70,000 sq. ft.
Maximum Buildable Square Footage Post-Bonus	<del><math>10,000 \times 4.25 \text{ GFAR}</math></del> = 85,000 sq. ft.
Square Footage Requiring Bonus	85,000 sq. ft. – 70,000 sq. ft. = 15,000 sq. ft (1394 sq. m)

DO YOU  
ASSERTAIN  
THE VARIANCE  
BETWEEN  
BUILDABLE GFAR  
AND MAXIMUM  
DENSITY GFAR

# 2019 Creighton Street



**Lot Size (Parking Lot)**  
**30m x 37.5m**

**Zone**  
CEN-2

**Maximum Height**  
**32m (10 Storeys, High-rise)**

**Maximum Lot Coverage**  
No requirement (abutting CEN-1 and CEN-2 zones)

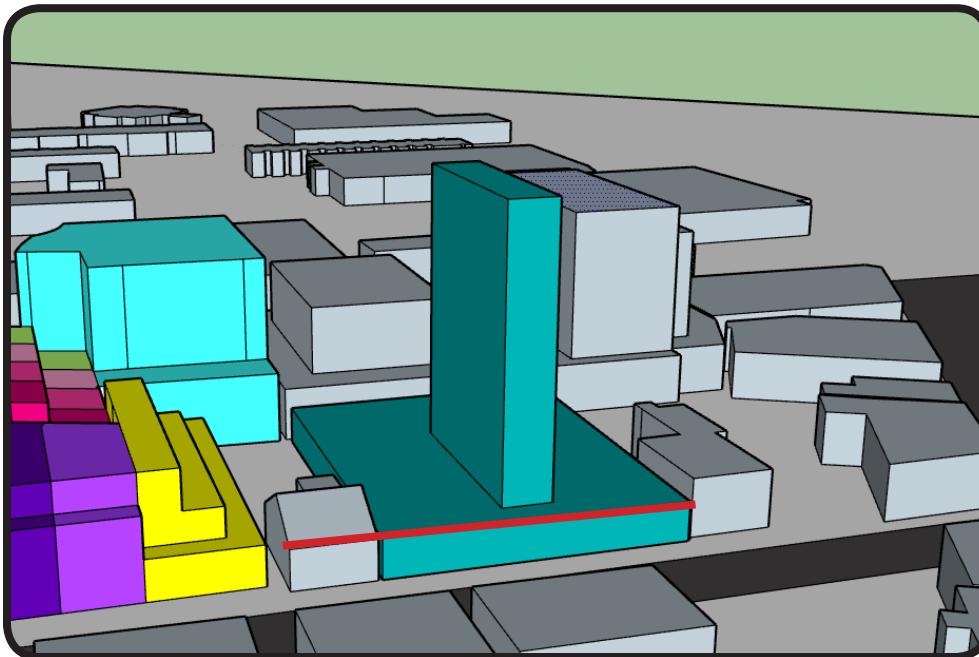
**Minimum Streetline Yards**  
1m

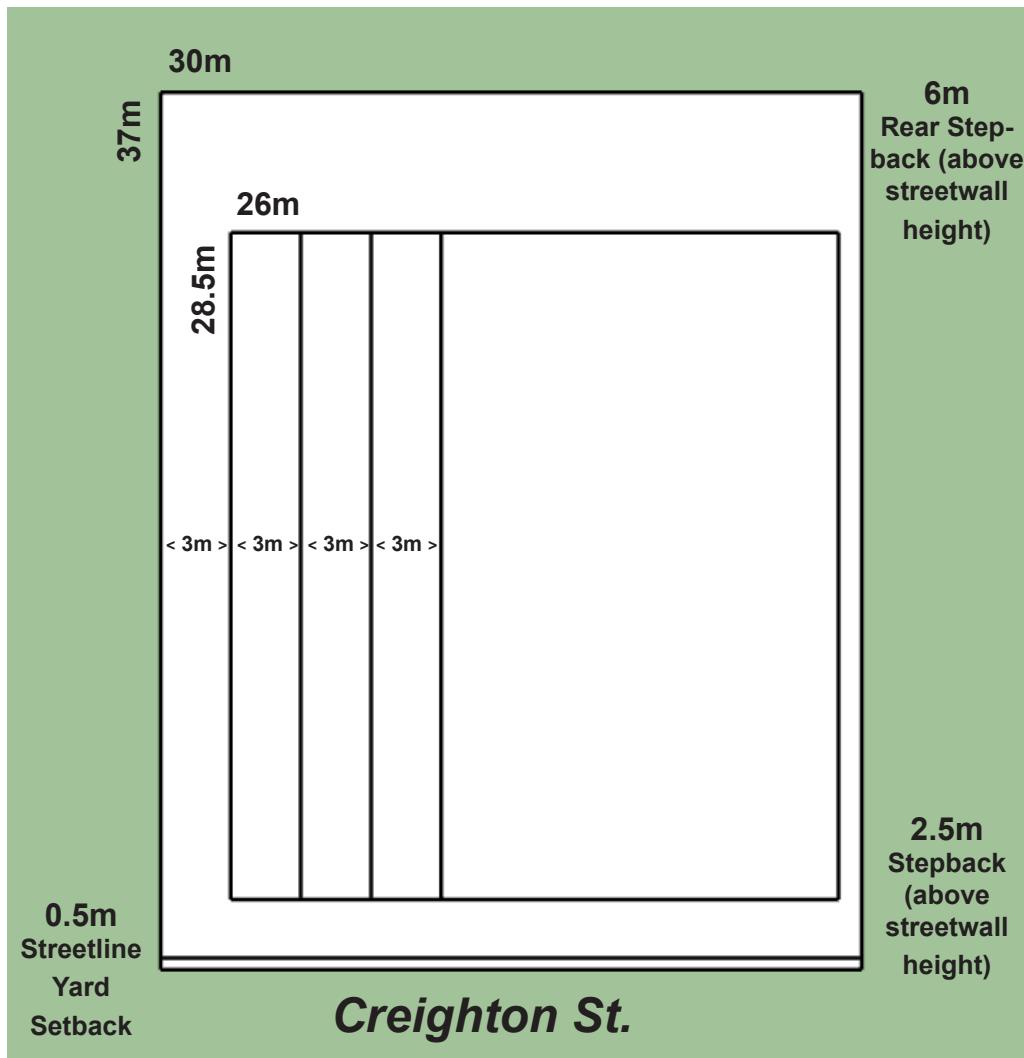
**Streetline Setback (above streetwall height)**  
3.5 m (for high rise)

**Side & Rear Yard Stepbacks (above streetwall)**  
**12.5m from interior lot lines**

**Heritage Design Guidelines**

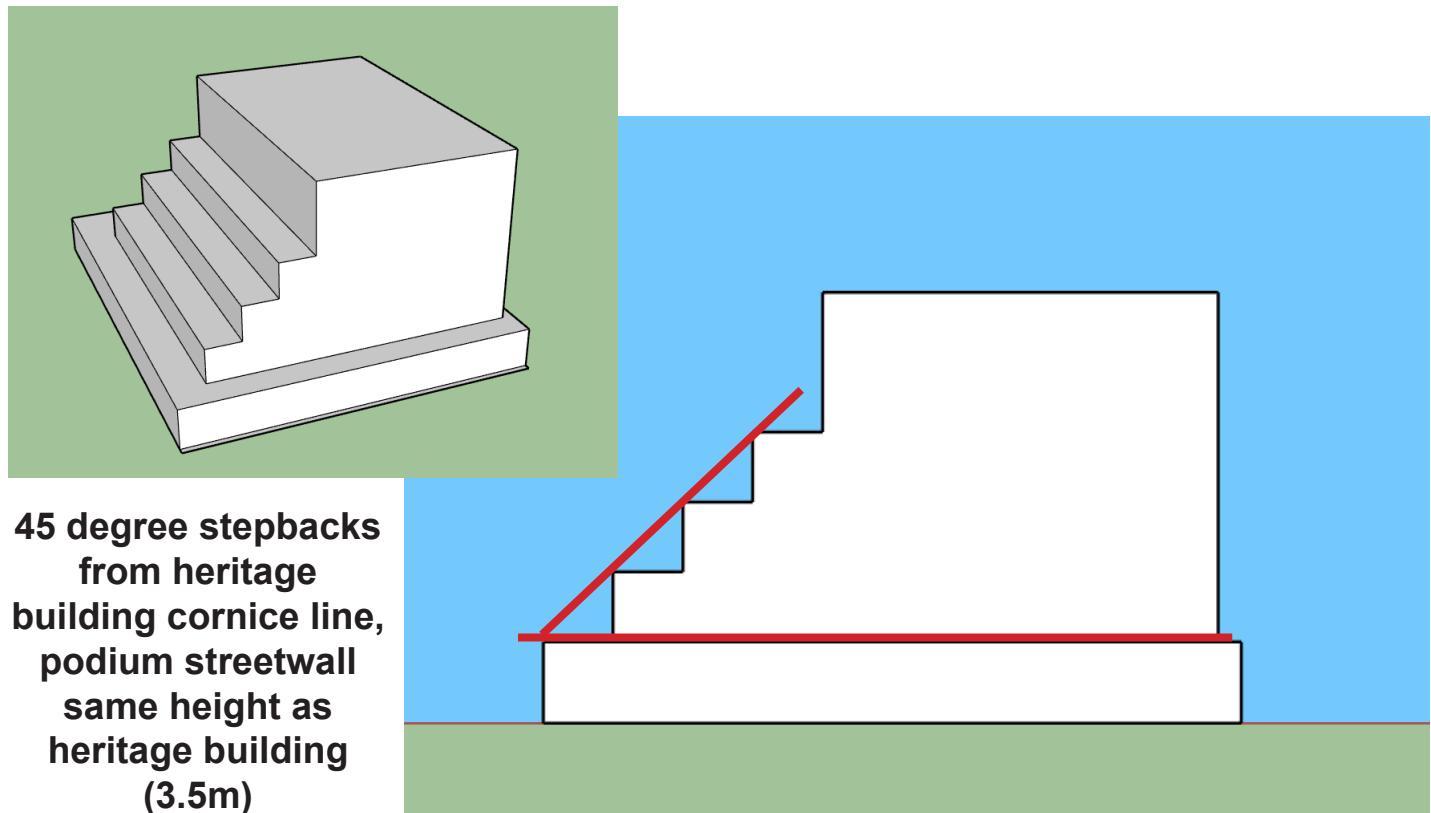
Maintain streetwall height by making the **cornice height** of any podium similar to that of abutting heritage buildings, in this case one storey (roughly 3.5m)

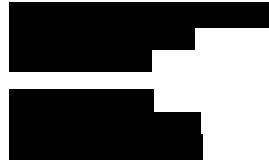




**2019  
Creighton  
Street  
(Mid-rise,  
maximum  
height  
20m)**

**Calculated  
GFAR: 3.22**





May 1, 2018

**Re: Centre Plan Feedback – Cultural Spaces**

To the Halifax Regional Municipality,

As an organization devoted to developing cultural spaces in the City, we urge council and the staff of HRM to consider the following amendments to the Centre Plan:

**Allow greater sections of the city to benefit from density bonuses**

The Centre Plan restricts the use of density bonuses to an uncompromising degree, which undermines the potential of the initiative to support much-needed cultural infrastructure and public art throughout most of the city.

Currently the plan restricts density bonuses to properties larger than 3.5 Gross Floor Area Ratio (GFAR). This proposal prevents most of Quinpool Road and many other areas from utilizing the density bonus incentive. As most cultural institutions exist in low-rise buildings, we strongly recommend lowering the GFAR for density bonuses to 2.5.

Further, the present GFAR calculation penalizes open-volume spaces often associated with community and cultural spaces. Theatres and concert halls are usually multi-story spaces, as all areas within the exterior walls are included in the calculation. For example, a 4,000 square foot open space with a three-storey height would result in 8,000 sq ft of 'air space' that would be lost to potential development.<sup>1</sup> This is similar to the present inclusion of elevator shafts, stairwells, mechanical shafts, etc. within the GFAR included area. We propose that such spaces used for cultural and / or non-profit purposes should not have the "void" space included in the GFAR.

**Devoting 25% of the density bonus to cultural facilities/public art is too low**

Currently the Centre Plan proposes to devote 75% of the proceeds from density bonuses to affordable housing and 25% to cultural infrastructure, public art and green space.

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<sup>1</sup> A three-story building with a 4,000 sq ft imprint would typically have 12,000 sq ft of usable space ( $3 \times 4,000 = 12,000$ ). However, with a building comprised of a large open space, effectively 8,000 sq ft would be not included in the present GFAR calculations.

The 25% figure is far too low considering the pressing need for these three priorities to transform Halifax into a creative city that inspires its citizens. Affordable housing is a vital initiative. But so is making our city a beautiful, attractive place for vibrant minds who take pride in a Halifax where art and performance can be created and enjoyed. 21<sup>st</sup> century cities that invest in the arts and their creative class thrive, period. We propose that the funds from density bonuses be split 50% between affordable housing and 50% towards cultural infrastructure, public art and green space.

### **Pool the density bonus proceeds**

Limiting the density bonus proceeds to individual developments would severely restrict the use of those funds and would result in initiatives that are limited in scope and vision. Furthermore, developers are not the best advocates for cultural spaces and public art- the community is.

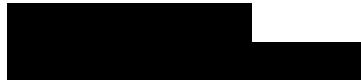
We propose giving developers the option to direct density bonus proceeds to be pooled into larger funds. Those funds would be devoted to public art and cultural spaces that are championed by the community through some form of democratic process. This approach would allow not only for larger, more exciting initiatives that can have a significant impact on Halifax's neighbourhoods, it would promote civic engagement and it would allow successful proponents of particular proposals to leverage funds from federal, provincial and private sources, drawing greater investment to the city. Ideally the funds would encourage developers and local community groups to partner and work together to nurture ideas for cultural innovation throughout the city, with the best ideas winning through the democratic process.

Thank you for considering our feedback, and we congratulate HRM staff and councillors for all the hard work performed on the Centre Plan so far. We will be watching carefully for revisions to the Plan that protect and enhance our cultural assets.

Sincerely,

**Original signed**

Marc Almon  
Managing Director  
Culture Link, CIC





May 3, 2018

To The Centre Plan Project Team,

On behalf of the Halifax Food Policy Alliance, we are pleased to provide feedback on the Halifax Regional Municipality's Centre Plan Package A materials.

Formed in 2013, the [Halifax Food Policy Alliance](#) (HFPA) is a partnership of individuals and organizations representing different sectors related to the food system. Food systems represent the activities and relationships that shape our food experiences. Using this systems thinking, the HFPA works to:

- Build awareness of existing and emerging food system opportunities at the municipal level;
- Connect and foster dialogue with diverse people and organizations to strengthen collaboration and advance action across the food system; and
- Inform and support food related policies and initiatives that benefit residents of Halifax.

The HFPA commends the Centre Plan Team for recognizing the role of the municipality and land-use planning in building healthy, just, and sustainable food systems. There are several policy directions included in the Centre Plan Package A materials that work towards improving community food security in HRM through enhancing urban agricultural capacity, increasing access to healthy foods in all neighbourhoods; and, improving community-scale food infrastructure and services.

Upon review of the materials, the HFPA has identified the following opportunities to strengthen the direction and policies outlined in Package A which are detailed below.

### **Community Food Infrastructure and Public Benefits**

- Include language around food in the discussion on *Complete Communities* (SMPS 2.1) to reinforce the importance of food for health and wellbeing as well as its role in fostering community connections and social cohesion<sup>1</sup>.

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<sup>1</sup> The Celebration principle in the [Draft Food Charter for HRM](#) outlines the role of food in building community.

- Consider spaces for residents to gather around food in new multi-family housing developments by incorporating ‘communal indoor and outdoor kitchens’ within the “Amenity Space” definition (LUB Part XIII, Chapter 1). This would reinforce the other food systems components already included within the definition (i.e. greenhouses, planters and plots for gardening, and barbecue areas).
- We are supportive of commercial kitchens being included as an appropriate Work-Live Unit use (LUB Part III, Chapter 1, 60) however based on the current wording we are unsure if this is included.
- Consider infrastructure for food storage, such as community freezers, to strengthen the local food system and prevent food waste.
- Related to this, consider adding a food system component to the list of ‘Public Benefit Categories’ associated with the density bonus mechanism (Part XI, Chapter 1, 197). Community kitchens, greenhouses, gardens, and food storage facilities would all be suitable for consideration, including as appropriate benefits to allocate cash-in-lieu contributions.

## Community Economic Development

- Link food systems with community economic development by including a statement about food businesses and small-scale healthy food retail within SMPS, Section 7. While there may not be a clear way to incentivize this, there could be consideration for incentives for at-grade-food retail beyond restaurants as a percentage of increase in densities with multi-unit infill developments.
- Consider including a statement around investigating options to support healthy food retail<sup>2</sup> initiatives such as streamlining the permit and license process for food-related businesses and pursuing additional legislative authority if needed.
- Include mobile healthy food vending such as food trucks and mobile food markets in Commercial Use definitions. Permit these uses in all Package A zones.
- Broaden the definition of farmers markets to include dairy products, grain products, meat, poultry and fish to provide opportunities for local producers to sell their products and to provide access to a variety of healthy foods.

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<sup>2</sup> Healthy Food Retail refers to a retail service or establishment which primarily provides healthy foods and beverages which may be prepared on-site or available for take-out and may also offer other convenience and household goods and contributes to improving the availability and accessibility of healthy foods and beverages included in Canada’s Food Guide which are low in sodium, sugar, and saturated fat.

## Urban Agriculture

- Include specific language around access to good quality compost to support urban agriculture. This could be referenced in section 9.2 and reinforced through requirements for recycling and compost collection infrastructure in mixed use and multi-family developments within the LUB (Part III, Chapter 1, 49).
- Include specific requirements around the type and amount of edible landscaping, including a separate definition<sup>3</sup> for this component. While edible landscaping is encouraged in the SMPS (Section 9.2) and is incorporated into the LUB to an extent through the landscaping definition (includes “fruit and vegetable plants”), the opportunity exists to strengthen this recommendation.
- Consider developing guidelines to provide direction on what is meant by the statement “at a scale appropriate with the local context” for urban agriculture and food production uses (Section 9.2, framing language).

## Food Environments

- Consider including a policy that restricts the creation of food deserts (limited food access) or food swamps (limited access to healthy food; high density of unhealthy foods<sup>4</sup>) as poor health outcomes are linked to unsupportive food environments. Currently there is no best practice for this; however, other Canadian jurisdictions have proposed “Minimum Distance By-laws”<sup>5</sup> to specify proximity of fast food restaurants in relation to schools.
- Building on prohibitions to fast food drive-through developments (SMPS Section 4.7, Policy 70), which tend to serve unhealthy foods, consider LUB definitions<sup>6</sup> differentiating “fast food restaurants” and “drive-through restaurants” from other restaurants as a lever to tailor permitted uses for zones in close proximity to schools.
- As suggested in the Package A materials, implement ongoing monitoring procedures to measure the number of housing units located within 1.2 km from a grocery store and the total number of community gardens on HRM land.

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<sup>3</sup> Suggested definition: the use of edible plants (fruits, vegetables, nuts, and herbs) that replace ornamental plants, are planted alongside decorative plants, and/or populate public barren areas.

<sup>4</sup> For the purposes of this document, healthy food includes foods in Canada’s Food Guide that are low in sodium, sugar and saturated fat and unhealthy food includes foods high in sodium, sugar, and saturated fat, such as sugar sweetened beverages, cookies, cakes or other sweets, potato chips etc.

<sup>5</sup> See [School Zone Report](#)

<sup>6</sup> See [Zoning By-law 8200](#) from District of Saanich, BC which excludes “fast food” and “drive-in” from restaurant definition and prohibits these uses in school/commercial zones

We would like to thank you for considering our feedback. Overall, the proposed policies in the Centre Plan Package A materials demonstrate promise in improving community food security in HRM and will contribute to achieving the vision in the Draft Food Charter for HRM. Effective, sustainable solutions to improve community food security will require a comprehensive Food Strategy that leverages existing resources and assets, harmonizes policies and programs, and helps to connect and coordinate efforts across the region. We continue to work with HRM on exploring the development of a Food Strategy. We also look forward to building on the positive opportunities in Package A through reviewing and providing feedback on Package B, particularly the inclusion of food production and gathering spaces in HRM Parks and Open Space, as well as chicken keeping and heritage farm uses. If we can be of any assistance in the future work, please do not hesitate to contact us.

Sincerely,

Madeleine Waddington  
Co-Chair

Aimee Gasparetto  
Co-Chair



May 4<sup>th</sup>, 2018

Dear Centre Plan Project Team,

**Re: Public Health-Central Zone, Response to Centre Plan Package A Materials**

The way communities are designed directly impacts the ability of residents to engage in healthy activities such as choosing active transportation, accessing local, nutritious foods, participating in commercial and economic ventures, and connecting with neighbours at social gatherings. The Regional Centre Secondary Municipal Planning Strategy (Centre Plan or SMPS) and the Regional Centre Land Use Bylaw (LUB) present a significant opportunity to promote health and well-being and address health disparities through municipal planning policies.

Public Health-Central Zone works with others to understand the health of our communities, and acts together to improve health. This includes developing partnerships to foster healthy public policies and address the social determinants of health in a range of settings ([NS Public Health Standards 2011-2016](#)). Applying this lens, and leveraging our Healthy Communities by Design partnership with Halifax, Public [REDACTED] the findings of its [Rapid Health Impact Assessment \(HIA\)](#) of the draft Regional Centre [REDACTED] (the Purple Plan) to the Com [REDACTED] Economic Development Sub-Committee in April 2017. The purpose of the HIA was to identify potential health effects of the Centre Plan on residents and shape an emerging conversation about land use and public health in Halifax.

This letter responds to the Centre Plan Package A materials released on February 23, 2018. We appreciate the opportunity to provide feedback into this process and thank-you for joining us at Public Health for a dedicated discussion. We also appreciate the diverse opportunities to be informed and provide feedback; our staff attended general information sessions and the community group workshop, and also visited the storefront.

Our Package A response builds on the findings of the HIA and focuses discussion around guiding principles developed for four theme areas: Food Systems, Housing, Mobility, and Sustainability. Literature discussing the health implications of the guiding principles/theme areas was included in the HIA and will not be repeated here.

## **Overarching Comments**

Overall, Public Health is supportive of the direction of the plan and is encouraged to see the focus on complete communities and pedestrian-oriented design as well as the mix of policies supporting affordable housing, urban agriculture, active transportation, and sustainability. *In many ways, the Centre Plan is a 'good news story' for building a healthier Regional Centre supportive of the well-being of its residents; the suggestions included in this letter are designed to reinforce and refine the opportunity the SMPS and LUB present.*



Three overarching comments are included for your consideration.

1. Consider identifying “Health + Wellbeing” as an opportunity under Section 1.4.1. Several of the policies within the plan create supportive conditions to improve the health of residents and collectively represent a significant opportunity which would benefit from inclusion in this section. Potential language could read:

Health + Wellbeing: the way communities are designed has a direct impact on the health and well-being of residents. Building communities with more opportunities to bike and walk safely and conveniently, take transit, access healthy foods and green spaces, and interact with neighbours supports population and individual health. To achieve and maintain optimal health status for its residents, the Regional Centre must be designed to protect the wellness of residents and make healthy choices easier.

2. We encourage the City to incorporate Purple Plan Policy 2.1.1(k) into the SMPS to “Develop an equity analysis review program for all HRM planning and land use services, and for the planning of all municipal infrastructure projects” (p.29). While it may be challenging to develop an appropriate methodology to support this work, it is important that equity considerations are not overlooked in planning and infrastructure decisions. Similar work is already underway as part of the implementation of the [Integrated Mobility Plan](#) (Action 71) with Public Health supporting these efforts. Public Health would also support work to integrate equity into the Centre Plan.

[REDACTED] Public Health’s Healthy Communities [REDACTED] to mitigate potential negative effects of tobacco, alcohol, and cannabis [REDACTED]. Based on evidence linking spatial separation and marketing with higher usage rates, we encourage the City to consider restricting land uses focused on tobacco, alcohol, and cannabis (when within City jurisdiction) from locating in close proximity to children and youth serving facilities such as schools, daycares and recreation centres. This includes:

- a. Drinking establishment use, Local drinking established use, Micro-brewery or micro-distillery use, and Cannabis production use (LUB Part II, Chapter II); and,
- b. Some retail, commercial and production/distribution uses.

Options exist to implement this approach for land uses falling within the second bullet. These include modifying the existing LUB definitions and adding new definitions focused on tobacco, alcohol, and cannabis, and/or adding specific text within the SMPS/LUB speaking to this issue. Further to this, the external appearance of these establishments should be non-promoting in nature. Where appropriate Public Health encourages the City to include guidelines to limit external features, window displays, and signage to achieve this objective. Advertising of these products should also be restricted at children and youth serving facilities.

## Food Systems

### *Guiding Principles for Public Health Input*

- Enhance urban agricultural capacity.
- Increase access to healthy foods in all neighbourhoods.
- Improve community-scale food infrastructure and services.



## *Areas of Package A Support for Food Systems Principles*

There are several policy directions through the Centre Plan Package A materials that support the development of healthy, just and sustainable food systems. Strengthening local food systems can contribute to positive improvements in health outcomes such as increases in mental well-being and reduction in chronic diseases.

### The Centre Plan Package A:

- Recognizes the importance of Urban Agriculture by reinforcing the Regional Municipal Planning Strategy ([Regional Plan +5](#)) community food security statement and including dedicated sections within both the SMPS (Section 9.2) and the LUB (Part 3, Chapter 3).
- Supports mixed use compact development and affordable housing and transportation options. This direction can create reductions in the cost of housing and transportation which can positively influence household food security as more money is potentially available to afford a healthy diet (HIA).
- Recognizes the role of food in creating vibrant communities through the inclusion of restaurants and grocery stores on pedestrian-oriented commercial streets.
- Supports community scale food infrastructure and services to eat, access, purchase and produce food:
  - Farmer's markets, keeping of bees as an accessory use, and urban farm uses (including [REDACTED] of products grown or produced [REDACTED] accessory use) in all Package A zones; [REDACTED] food production use in the [REDACTED] zones;
  - Garden centre uses in CEN-2 zones;
  - Local commercial uses (includes the sale of a range of food products) and restaurant uses in all Package A zones (only permitted in HR-1 if on a corner lot);
  - Food banks and soup kitchens in all Package A zones; and,
  - Greenhouses in all Package A zones (includes height and coverage exceptions).
- Includes ongoing monitoring of the number of units located 1.2 km from grocery store and the number of community gardens on HRM land (note: recommended the monitoring specify 'Full Service Grocery Stores').

## *Missing Information/Missed Opportunities*

### Complete Communities and Public Benefits

- While the Package A materials support food systems in several areas, overall the connection to the role food plays in relation to people, employment, and creating complete communities could be stronger. Consider including language around this in the discussion on the Complete Communities principle (SMPS 2.1). Building on this, the Celebration principle in the [draft HRM Food Charter](#) is a good resource to support this suggestion.
- Consider adding a food system component to the list of 'Public Benefit Categories' associated with the density bonus mechanism (Part XI, Chapter 1, 197). Community kitchens, greenhouse and gardens would all be suitable for consideration, including as appropriate benefits to allocate cash-in-lieu contributions.



## Community Economic Development

- There is an opportunity to link food systems with economic development by including a statement about food businesses and healthy food retail within SMPS Section 7 – Economic Development.
- Consider including a statement around investigating options to support healthy food retail initiatives such as streamlining the permit and license process for food-related businesses (and others). Pursue additional legislative authority if needed.

## LUB Definitions and Landscaping Requirements

- Broaden the definition of “Farmers Markets” to include dairy products, grain products, meat, poultry and fish to provide opportunities to more local producers and provide access to a variety of healthy foods.
- Define “Healthy Food Retail” in the LUB and incorporate this language into the definitions for “Grocery Store” and “Local Commercial Use” as appropriate. The purpose of this is to recognize this as a specific type of use which may be incentivized through other mechanisms in the future. A suggested definition reads:

Healthy Food Retail refers to a retail service or establishment which primarily provides healthy foods and beverages which may be prepared on-site or available for take-out and may also offer other convenience and household goods and contributes to improving the availability and accessibility of healthy foods and beverages included in [REDACTED] Canada's Food Guide which are low [REDACTED] and saturated fat.

[REDACTED] The opportunity exists to better link spaces for residents to gather around food in new multi-family housing developments by incorporating ‘communal indoor and outdoor kitchens’ within the “Amenity Space” definition (LUB Part XIII, Chapter 1). This would reinforce the other food systems components already included within the definition (greenhouses, planters and plots for gardening, and barbecue areas).

- While edible landscaping is encouraged in the SMPS (Section 9.2) and is incorporated into the LUB through the Landscaping definition (includes “fruit and vegetable plants”), the concept could be advanced further. This could include specific language and requirements around edible landscaping including a separate definition for this component (and corresponding modification to the existing Landscaping definition). A suggested definition reads:

Edible Landscaping refers to the use of edible plants such as fruits, vegetables, nuts and herbs to replace and/or complement other forms of landscaping.

## Healthy School Communities

- As part of Public Health’s work on creating Healthy School Communities we are supportive of policies that limit unhealthy food locating and advertising near schools. While we encourage the City to explore additional options, the prohibition of drive-through developments, except in the Light Industry and Harbour Industry zones where schools are unlikely to be located, is a good first step (SMPS Section 4.7, Policy 70). Drive-through uses promote sedentary behavior and tend to serve foods high in sugar, fat, and salt.
- A complementary approach would be to differentiate specific types of restaurant uses, e.g. fast food, drive-in, and then prohibit these uses and related signage within close proximity to schools.



## Other Opportunities

- Consider including a policy that restricts developments that would create food deserts (limited food access) or food swamps (limited healthy food access, high density of fast foods) as poor health outcomes are linked to poor food access environments (HIA). Currently there is no best practice as to how to achieve this; one possibility specific to Centre Plan is to also limit drive-through developments in Light Industry and Harbour Industry zones.
- Although not directly linked to health outcomes, access to good quality compost is important to supporting urban agriculture. Specific to this plan, opportunities exist to include specific language about this in section 9.2 and reinforce this through requirements for recycling and compost collection infrastructure in mixed use and multi-family developments within the LUB (Part III, Chapter 1, 49).

## Further Clarification/Package B

- Public Health is supportive of commercial kitchens being included as an appropriate Work-Live Unit use (LUB Part III, Chapter 1, 60). Based on the current wording we are unsure if this use is included.
- What guidelines will be developed to determine what will be considered “a scale appropriate with the local context” for urban agriculture uses (Section 9.2, framing language)?
- It is unclear whether mobile healthy food vending/retail such as food trucks and mobile food markets are considered by the Centre Plan. Public Health supports explicit language/policy in [REDACTED] support of these elements.
- Public Health is looking to Package B for clarification on components such as the keeping of chickens as an accessory use and heritage farm uses, as well as whether small-scale food production (e.g. community gardens, ovens), farmers markets, and gathering spaces such as barbecue areas will be included as permitted uses in the parks and open space network.
- In addition to these specific suggestions, Public Health is excited to see that Halifax is exploring the creation of a Food Strategy. We encourage this work to move forward and for any applicable recommendations for the Centre Plan area to be incorporated into the next Regional Centre SMPS/LUB update.

## Housing

### *Guiding Principles for Public Health Input*

- Increase access to affordable and suitable housing through provision of diverse housing forms and tenure types.
- Ensure adequate and accessible housing quality for all segments of society.
- Prioritize housing for the homeless, elderly, low income groups, and persons with disabilities.
- Site and zone housing developments to minimize exposure.

### *Areas of Package A Support for Housing Principles*

Overall the Package A materials support Public's Health's housing principles in a number of areas. Healthy housing is recognized as providing affordable, adequate, accessible, safe, and secure shelter



that is free of hazards and enables people to engage in activities of daily living while optimizing their health. Quality and affordable housing is imperative to improving the health of Nova Scotians (HIA).

### The Centre Plan Package A:

- Facilitates diversity in the housing stock including by permitting a range of housing forms within all Package A zones. This includes a requirement for 30% of total units in multi-unit buildings to be 2 or 3-bedrooms and a range of supportive and transitional housing forms. Diversity in the housing stock in Package A zones provides options for different size households and family types to live near commercial areas, community amenities, employment opportunities, active transportation, and transit service.
- Permits several uses which support home-based businesses within all Package A zones (i.e. home occupation, home office, work-live unit, keeping of bees as an accessory use). This provides additional flexibility for residents to generate household income.
- Recognizes the importance of providing incentives to encourage the development of affordable housing, including the use of bonus zoning for density above 3.5 FAR. Directing 75% of the proceeds towards affordable housing projects identifies this as a clear priority.
- Encourages the integration of affordable units into market unit buildings which in turns provides equitable access for residents in affordable units to building and community amenities.
- Recognizes the role of a mix of partners, including the provincial and federal governments and non-profit organizations in achieving affordable housing targets. Building on this component, it is important to link affordable housing with other support programs for those who need them to help maintain their housing.
- Provides for detailed annual monitoring of affordable housing units provided as a public benefit. This is linked with several other indicators tracking housing trends in the Regional Centre, including the number of households in core housing need (both owners and renters).

### *Missing Information/Missed Opportunities*

#### Affordable Housing

- While Public Health recognizes the complexities and work associated with the proposal to permit bonus zoning in exchange for public benefits, we are concerned about the short length of the Minimum Affordability Period of 180-months. We encourage the City to explore other incentives, including the regulatory incentives identified for consideration in SMPS Policy 83, that could be combined with bonus zoning to stimulate its uptake and allow for a longer Minimum Affordability Period (e.g. permit fee waivers, property tax reductions for the affordable units, priority permit processing).
- While Package A considers the use of surplus municipal land for affordable housing, discussions with HRM staff indicated this opportunity is limited given the overall direction and classification of surplus properties within [Administrative Order 50](#). Despite this, Public Health encourages the City to leverage surplus lands to support achieving the Affordable Housing targets adopted by Regional Council in 2016. This could include revising AO 50 to identify suitable properties for this purpose and/or dedicating funds from future land sales towards the development or renewal of affordable units.
- Consider allowing residents in affordable units to renew their lease (after their current lease period is over) for up to twelve additional months after they no longer meet the requirements

## Appendix L



of the initial household income limit. This will provide these residents with additional stability and the opportunity to increase savings to support their transition to market housing (LUB Part XI, 198 (7)).

### Renewals/Redevelopment

- While Package A includes a policy that “encourages the renewal, repair and upgrade of non-market affordable housing units” (SMPS Policy 84.f), this statement could be strengthened by using language that outlines a larger role for the municipality in the renewal of housing stock. In addition, the Centre Plan may also want to include a statement around ensuring that housing units remain affordable after repairs or renewal is completed.
- Related to this, as neighbourhoods are renewed, it is anticipated that some affordable rental housing will be torn down. A missed opportunity is the Centre Plan does not speak to this condition. Consider including language that requires no net loss of rental units as part of redevelopment projects.

### Definitions

- Public Health is concerned that the definition of “Affordable Housing” in the LUB is limited to rental housing (Part XIII, (8)). While this definition may serve the purpose associated with proposed bonus zoning approach, it limits affordable home-ownership options that could fit within other Centre Plan policies, for example, SMPS policy 84.e and LUB policy 198(2).  
[REDACTED] the current definition of Affordable [REDACTED] housing is inherently considered [REDACTED] using. With this in mind, [REDACTED] action SMPS 6.3 speaks to “Affordable Non-Market Housing” rather than just “Affordable Housing”.

### Other Comments

- Consider including language around working with the Province to ensure 100% of units in smoke free multi-unit buildings are smoke free.
- Public Health is encouraged to see policy support for solar panels within the LUB. Consider opportunities to make connections to the [Solar City](#) program to help reduce housing expenses and contribute to affordability.
- While specific statements are included in the design guidelines for Future Growth Nodes, consider incorporating a general policy statement to buffer residential developments from high traffic areas. Reintroducing the language in the Purple Plan is encouraged: “Encourage the use of buffers, buildings or landscape design to limit and/or mitigate negative air quality impacts to building users and residents, particularly in areas near highways, regional truckways, high traffic streets and other sources of air pollution” (policy 2.1.2 aq).

### *Further Clarification/Package B*

- The inclusion of supportive housing, single-room occupancy, rooming houses, half-way housing, and emergency shelter uses in Package A zones will help facilitate these uses locating near transit and amenities. If these uses are also included in a wide range of Package B zones, Public Health encourages the City to explore incentives that will encourage these uses to locate near transit and amenities.



- With regards to home-based businesses, what, if any, are the implications for rental properties and property taxes? As noted above, Public Health views this component as an important tool in helping make housing more affordable and allowing for more flexible options to support household income.

## Mobility

### *Guiding Principles for Public Health Input*

- Enable mobility for all ages and abilities.
- Make active transportation convenient and safe.
- Encourage use of public transit.

### *Areas of Package A Support for Mobility Principles*

The Package A materials include a number of supportive policy statements that prioritize availability and access to active transportation and transit systems. Prioritizing walking, cycling, and public transit could reduce cardiovascular and respiratory disease from air pollution, injuries to people who cycle and walk, noise and noise-related stress, and chronic diseases through an increase in physical activity, while also increasing health equities and community cohesion (HIA).

[REDACTED]

[REDACTED]

[REDACTED]

- Focuses on designing for people and supporting pedestrian activity. The degree to which the 'Pedestrian's first' principle is woven throughout the SMPS and LUB and linked with the 'Human-Scale' principle, the Design Guidelines (LUB Appendix 1), and the pedestrian-oriented commercial areas concept is one of the strengths of Package A from a health perspective.
- Recognizes the link between land use and transportation through its Complete Communities and Strategic Growth principles and policies supporting compact mixed-use development. This integration focuses growth into areas with higher levels of pedestrian infrastructure and transit service and makes it easier for people to choose active forms of transportation, take transit, and engage in social interactions in their community.
- Reinforces the direction in the IMP to reflect the following travel mode hierarchy: prioritizing pedestrians first, then cyclists, public transit, car sharing, and lastly, private cars. This includes requiring future transportation impact studies for development proposals to reflect this hierarchy.
- Provides specific policy direction to make walking and cycling safe, comfortable and convenient for people of all ages and abilities. This includes providing policies with the SMPS and LUB to ensure sites and buildings are accessible to everyone and incorporate barrier-free design principles.
- Updates parking and loading standards and design guidelines to reflect the orientation towards people who walk and cycle. This includes comprehensive bicycle parking guidelines, restrictions on the placement of off-street loading and vehicle parking, and updated landscaping and screening requirements.
- Introduces a Transportation Reserve zone which can be used to implement strategic projects, including those that support transit and active transportation infrastructure.



- Reinforces the focus on pedestrians, cycling, transit, and affordable housing by removing minimal vehicle parking requirements for several uses in Package A zones.

### *Missing Information/Missed Opportunities*

## Accessibility & Equity

- Although the Package A materials do speak to barrier-free design and link ‘all ages and abilities’ to the pedestrian first principle, the concept of universal accessibility could be strengthened throughout the document, including within framing language, objectives and policies. Opportunities within the SMPS include but are not limited to:
    - Section 1.4.1 – Opportunities, “Mobility” (p.7), last sentence, consider “....Advancing technologies and better integration with land use can improve the choice, variety and integration of multiple transportation modes for people of *all ages and abilities*, and become a defining feature of the Regional Centre.”
    - Section 4 – Built Form Framework introduction (p.55), last sentence of paragraph two consider “...The built form framework also includes related matters such as *barrier-free design*, landscaping, parking and driveways and signs.”
    - Section 8 – Mobility (p.100), objective M2, consider “Implement an integrated mobility approach that supports a variety of sustainable transportation options *for people of all ages and abilities* in the Regional Centre.”

[REDACTED] section 8.1 – policy 93 consider “...[REDACTED]y the applicant, shall reflect the [REDACTED]y of travel modes set out in [REDACTED], prioritizing pedestrians first, then cyclist, public transit, car sharing, and lastly, private cars, *and consider impacts for people of all ages and abilities.*”

- While equity considerations were addressed as an overarching theme, it is worth reinforcing this issue with respect to mobility given that the IMP includes specific policy direction and action items for active transportation infrastructure. As a minimum, Public Health encourages the Centre Plan to reinforce the IMP's approach on equity analyses and consider the needs of residents more dependent upon non-vehicle transportation when making infrastructure investment decisions across neighbourhoods (e.g., neighbourhoods with a high proportion of children and youth, seniors, low income earners, persons with disabilities).

## Complete Streets/Street Hierarchy

- In order for the municipality to embed a Complete Streets approach across departments, a number of tools and updated design guidelines are defined. A street classification system needs to be established that incorporates both the importance of context and transportation function of the street. In addition, a clear vision for each street (beyond current conditions) needs to be determined in order to inform retrofit designs.
  - Building on this point, additional information is required about how the street hierarchy will function within the Regional Centre and what priority the different user groups will be given on the different street types. Does the ‘pedestrians first’ principle apply to all streets within the Regional Centre?

## Appendix L



### Other Comments

- Consider lowering speed limits on residential streets and streets with significant destinations, such as parks and playgrounds (as is done in school zones). Research shows that reduced vehicle speeds results in reduced severity of injury if a collision were to occur.
- Attention must be paid to how shifting traffic patterns from residential streets toward Corridors may impact health inequities.
- While the overall focus on complete communities addresses this issue to an extent, consider incorporating in SMPS Section 8 – Mobility language recognizing the importance of safe active routes to schools and supporting school travel planning programs.
- Consider how the Centre Plan will be implemented to align with other planning documents that have a role in promoting active living and access to community spaces and places. This can increase the likelihood of achieving complete communities.

### Sustainability

#### *Guiding Principles for Public Health Input*

- Preserve and connect open space and environmentally sensitive areas.
- Maximize opportunities to access and engage with the natural environment.
- Reduce urban air pollution.  
[REDACTED]
- Minimize urban heat island effects.  
[REDACTED]
- Reduce climate-change extreme weather event related impacts.  
[REDACTED]

#### *Areas of Package A Support for Sustainability Principles*

By integrating ecosystem principles into the overall design of our community, we are increasing our resilience to climate change, protecting biodiversity, and supporting the health and well-being of residents. The Centre Plan Package A materials include several policies that support sustainability in the Regional Centre.

#### Centre Plan Package A:

- Promotes the development of compact, walkable, complete communities. Building on the Regional Plan +5 growth targets, 40% of future growth in the region will be directed to the Regional Centre. This in turn reduces sprawl and preserves open space connectivity, ecological function, and biodiversity in other areas of the municipality.
- Provides supportive policies around energy efficiency design and renewable energy generation, including solar panels, wind turbines, and district energy in Centres and Future Growth Nodes. This includes the requirement for new development in areas served by district energy to connect to this system.
- Prioritizes the needs of high density, under-resourced and growing neighbourhoods in master planning exercises for the open space network.
- Reinforces the direction on the Regional Plan in terms of several ecosystem and sustainability features including but not limited to watercourse setbacks, flooding and storm surge protection, daylighting of watercourses, energy conservation, and urban forest management.

## Appendix L



- Promotes a connection with the natural landscape by preserving historic views to the water and recognizing that access to parks and open space are key components of complete communities.
- Includes policies that encourage the 'greening' of the City including stronger landscaping standards, requirements for green roofs under certain development conditions, and monitoring of the tree canopy coverage.

### *Missing Information/Missed Opportunities*

#### Environmental Considerations

- Protecting sensitive environmental areas is a key component of a Connected Open Space Network (Section 9.3). Consider including explicit language around this as part of Policy 103 which speaks to considerations for open space network master planning.
- Consider including an objective around air quality in Section 9 - Environment. This is supported in other areas of the plan through policies around mobility, compact development and developing a parks and open space network.

#### Access to Green Space

- The opportunity exists to formalize criteria and an assessment process by which to prioritize investments in neighbourhood parks and other green spaces, including the role of equity considerations in this assessment.  
[REDACTED] While the number of housing units within 400m of a park will be tracked as an indicator, [REDACTED] the plan does not identify any targets in this area.
- Consider including a requirement for common outdoor amenity space in new housing developments. Outdoor amenity space provides opportunity for residents to enjoy additional greenspace or features such as vegetable gardens and children's play areas.

#### Green Building and Site Design Considerations

- Strengthen the language in the plan around promoting sustainable building and site design practices. Develop a specific policy on this topic (opposed to Policy 103.e which is limited in scope) and introduce core concepts within the LUB Design Guidelines.
- While the LUB direction around solar panels and wind turbines is a good step, additional strategies are needed that provide for retrofitting current structures to reduce energy requirements and meet energy needs in cleaner, more sustainable ways. The Ontario Government 2016 [Climate Change Action Strategy](#) outlines a number of sustainability dimensions that could be integrated in Halifax.

#### *Further Clarification/Package B*

- Public Health is interested to see how the draft Green Network Plan (GNP), anticipated to be released this spring, relates to the Centre Plan, and in particular the Package B materials on Parks and Open Space. As part of our review of Package B, we will be looking for opportunities to strengthen the connection between these two plans in ways that will improve the health and well-being of Halifax residents. As the Centre Plan is a statutory plan while the GNP is a priority plan, it is important to ensure strategic directions from the GNP are included within the SMPS and LUB where appropriate.

## Appendix L



### Final Thoughts/Next Steps

Based on the Centre Plan Package A materials, Public Health is supportive of the overall direction envisioned for the Regional Centre. Package A provides several policies supportive of improving the health and well-being of Halifax residents. We are pleased to provide any additional information or support in relation to our suggestions to reinforce and refine the Package A materials and/or with regard to 'health' questions or comments that may have been received during your consultation period. We look forward to reviewing the Package B materials and will continue to support the Centre Plan process through the Healthy Communities by Design partnership.

Thank-you again for the opportunity to participate in the process.

Sincerely,

**Original signed**

Holly Gillis  
Manager, Healthy Communities  
Public Health, Central Zone  
[Redacted]  
[Redacted]

**Original signed**

Dr. Trevor Arnason, MSc, MD, CCFP, FRCPC  
Medical Officer of Health  
Public Health, Central Zone  
[Redacted]  
[Redacted]

cc: Public Health (CZ)

- Holly Gillis, Manager, Healthy Communities
- Dr. Trevor Arnason, Medical Officer of Health
- Rita MacAulay, Public Policy & Social Action Consultant
- Amber Walker, Healthy Built Environment Coordinator

HRM - Healthy Communities by Design

- Kate Greene

HRM - CPED Chair

- Deputy Mayor Wayne Mason

HRM - Centre Plan Team

- Kasia Tota
- Jacob Ritchie
- Carl Purvis

### Proposed Pleasant Street Corridor Description for HRM Centre Plan

Submitted to HRM by the Pleasant-Woodside Neighbourhood Association  
July 11, 2017

The Pleasant Street Corridor runs south from the top of Newcastle Street to Acadia Street in Dartmouth. This corridor is oriented to a mix of residential and commercial uses; the side streets connected to it are residential in nature and contain a mix of housing types. North of Newcastle to Five Corners, the street is a residential street. South of Acadia Street to the Circumferential Highway, the street is largely commercial and institutional.

The corridor is an instrumental automobile and transit link connecting downtown Dartmouth to the South Woodside, Eastern Passage and Cow Bay communities.

Redevelopment of this corridor focusing on a combination of low-rise commercial, professional and residential uses should be encouraged. The centerpiece of this redevelopment should be the former Sobeys plaza property. Such redevelopment should enhance (access to) the assets of the neighbourhood which include the North Woodside Community Centre and the parkland adjacent, the Dartmouth Harbourfront Trail, NSCC, the Harbour Ferries and the new Dartmouth South Academy (P-8) School.

A redevelopment of the former Sobeys lot could create a stronger core for the neighbourhood. Mixed-use and modest density increases are appropriate for this lot and would draw more residents to the area. Developers of this lot should consider dividing the property into several lots to improve walkability and human scale. A plaza in the centre of this lot would promote public gathering and act as a focal point for the corridor.

Redevelopment should prioritize the concept of the corridor as a complete street. Pedestrian and active transportation should be a stronger competitor to car use through decreasing the size of traffic lanes, creating bike lanes, and widening sidewalks. Design measures such as street trees and potted flowers would facilitate traffic calming while simultaneously improving the public realm for residents and visitors.

To the Halifax Regional Municipality,

We, the advocates of revitalization of the Oxford Theatre, urge council and the staff of HRM to consider the following amendments to the Centre Plan:

### **Allow greater sections of the city to benefit from density bonuses**

The Centre Plan restricts the use of density bonuses to an uncompromising degree, which undermines the potential of the initiative to support much-needed cultural infrastructure and public art throughout most of the city.

Currently the plan restricts density bonuses to properties larger than 3.5 Gross Floor Area Ratio (GFAR). This proposal prevents most of Quinpool Road and many other areas from utilizing the density bonus incentive. As most cultural institutions exist in low-rise buildings, we strongly recommend looking at ways to encourage developers to incorporate cultural and non-profit spaces in their projects which fall under 3.5 GFAR.

Further, the present GFAR calculation penalizes open-volume spaces often associated with community and cultural spaces. Theatres and concert halls are usually multi-story spaces, as all areas within the exterior walls are included in the calculation. For example, a 4,000 square foot open space with a three-storey height would result in 8,000 sq ft of 'air space' that would be lost to potential development.<sup>1</sup> This is similar to the present inclusion of elevator shafts, stairwells, mechanical shafts, etc. within the GFAR included area. We propose that such spaces used for cultural and / or non-profit purposes should not have the "void" space included in the GFAR.

### **Devoting 25% of the density bonus to cultural facilities/public art is too low**

Currently the Centre Plan proposes to devote 75% of the proceeds from density bonuses to affordable housing and 25% to cultural infrastructure, public art and green space.

The 25% figure is far too low considering the pressing need for these three priorities to transform Halifax into a creative city that inspires its citizens. Affordable housing is a vital initiative. But so is making our city a beautiful, attractive place for vibrant minds who take pride in a Halifax where art and performance can be created and enjoyed. 21<sup>st</sup> century cities that invest in the arts and their creative class thrive, period. We suggest this balance be reviewed.

### **Pool the density bonus proceeds**

Limiting the density bonus proceeds to individual developments would severely restrict the use of those funds and would result in initiatives that are limited in scope and vision. Furthermore, developers are not the best advocates for cultural spaces and public art. The community is.

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<sup>1</sup> A three-story building with a 4,000 sq ft imprint would typically have 12,000 sq ft of usable space ( $3 \times 4,000 = 12,000$ ). However, with a building comprised of a large open space, effectively 8,000 sq ft would be not included in the present GFAR calculations.

## Appendix N

We propose giving developers the option to direct density bonus proceeds to be pooled into larger funds. Those funds would be devoted to public art and cultural spaces that are championed by, and connected to, the community through some form of democratic process.

This approach would allow not only for larger, more exciting initiatives that can have a significant impact on Halifax's neighbourhoods, it would promote civic engagement and it would allow successful proponents of particular proposals to leverage funds from federal, provincial and private sources, drawing greater investment to the city. Ideally the funds would encourage developers and local community groups to partner and work together to nurture ideas for cultural innovation throughout the city, with the best ideas winning through the democratic process, an example of such method is the long standing tradition of participatory budgeting in different HRM districts.

Thank you for considering our feedback, and we congratulate HRM staff and councillors for all the hard work performed on the Centre Plan so far. We will be watching carefully for revisions to the Plan that protect and enhance our cultural assets.

Sincerely,

Georgia S. Atkin  
Organizing member of the 'Save the Oxford' community group





A SCANNER  
DARKLY  
STARRING  
KEANU REEVES  
TODAY AT  
4:30 6:45 9



## United Way Halifax

May 4, 2018

Planning & Development  
Halifax Regional Municipality  
40 Alderney Drive, 1st Floor  
Dartmouth, NS B2Y 2N5

RE: Centre Plan “Package A” Response

I am writing to you today on behalf of United Way Halifax in response to the Centre Plan “Package A” materials and their relationship to the issues of poverty, housing and inclusion.

In recent years, United Way Halifax has seen the Municipality take on an increasingly strong role in advocating for the equal treatment of our city’s most marginalized populations. We have been proud to be a partner with you at the Housing and Homelessness Partnership and more recently to partner with you in the development of the Poverty Solutions Community Report. In many respects, we see the Centre Plan as a tremendous achievement, ultimately, the Centre Plan represents a rare opportunity to affect real, systemic social change, as well as a chance to make significant headway toward implementing many of the “Ideas for Action” identified in the Poverty Solutions Community Report.

The ideas for action included in the Poverty Solutions Community Report were generated by the community through a process guided and stewarded by the Poverty Solutions Advisory Committee. The content is rooted in the best available research and evidence, the social determinants of health, good work already happening in the community, and engagement with more than 1,100 residents over an eight-month period.

We believe the draft Centre Plan aligns with the many of the Ideas for Action identified in the Poverty Solutions Community Report. The Community Report and Centre Plan share the similar visions of creating communities that meet the needs of HRM’s diverse population, including those who are most marginalized.

From its foundational values of “Complete Communities” and “Pedestrians First”, to the provisions supporting new economic opportunities (e.g. home-based businesses and urban agriculture) and cultural inclusivity, the Centre Plan indicates an appreciation for the many factors that impact true quality of life, while making important and progressive steps toward building a more just and equitable city.

United Way Halifax would however like to see HRM adopt a much stronger and prescriptive approach to the preservation and construction of affordable housing within the urban core. Given the strategic objective of increasing population density in the Centre Plan area over the next twenty years, there is every reason to believe that our most vulnerable citizens will soon be priced out the market unless policies are established to prevent it. This is not equitable. This is not just. And, it will only reinforce the challenges suffered by those trapped in the cycle of poverty.

.../2

## Appendix P

This is not to suggest that the Municipality is solely responsible for addressing the issues of poverty and the crisis of affordable housing in which we now find ourselves. These challenges have been decades in the making, and have established deep roots in our social, economic, and cultural systems. It will take a concerted effort from all levels of government, the non-profit sector, industry, and the public at large to ensure that everyone is afforded the right to a Home and a life of dignity. But we do believe that the Centre Plan is an opportunity we cannot afford to miss.

In the attached pages, we have prepared our detailed response to the Plan, with reference to all areas in which we believe there is the potential to make a positive and lasting change.

Thank you for the opportunity and please reach out if you wish to discuss further.

Yours truly,

**Original signed**

Sue LaPierre  
Director, Community Impact

## United Way Halifax Response to Centre Plan “Package A”

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### **VISION AND PRINCIPLES (P. 12-17)**

#### **Complete Communities**

The Centre Plan defines Complete Communities as: ...support(ing) a variety of lifestyles, enabling people of all ages, abilities and backgrounds to live work, shop, learn and play near one another. This diversity of people and activities enables communities to be physically, socially and economically vibrant. This Plan provides land use and design policies to promote the mixed use and development that allows people to safely and conveniently access the goods and services they need in their daily lives, all within a short journey.

As such, the concept speaks to issues of equity, inclusion, and accessibility, not only as a moral imperative, but as necessary elements of a successful community. It alludes to themes similar to those of a “social determinants of health” perspective, suggesting a progressive policy direction well in line with the work of the HHP, United Way Halifax, the Nova Scotia Health Authority (NSHA), etc. The Plan also indicates an intention to bring the benefits of the Complete Communities model to all areas of the city, suggesting some degree of remedial action for neglected neighbourhoods and areas without access to essential services.

United Way Halifax strongly recommends that the Complete Communities model is implemented equitably to ensure that neighbourhoods in need have access to the services and resources they need to thrive.

#### **Human Scale**

Although largely a design focused concept, the term does imply a more inviting, accessible, and human oriented public environment. The Plan includes at least one statement relating to increasing the availability of public, and in some circumstances, gender neutral restrooms. This is a big win for individuals without a home, or the money to access “customers only” facilities.

#### **Pedestrians First**

This is a game changer! As the Plan indicates, “(s)ince all citizens are pedestrians, placing pedestrians first improves the urban environment for everyone (p. 16).”

This is an inherently equitable policy statement, which serves to undermine the significant advantages afforded to those with the financial means to own and operate a private vehicle.

#### **Strategic Growth**

The Centre Plan suggests that by 2030, 40% of all population growth in the city will occur within the regional centre. And, while concentrating growth in the city centre is highly advisable from an environmental and economic perspective, there is a real risk that, without strong interventions, the inevitable increase in property values will price many individuals out of the market. Strategies will need to be developed, including well-defined monitoring of the housing stock, to ensure that this does not occur.

## United Way Halifax Response to Centre Plan “Package A”

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### **Urban Structure (p. 20) –**

Under “Urban Structure” the Centre Plan designates specific areas of the city for concentrated, strategic growth, according to a prescribed typology (i.e. Centres, Corridors, Future Growth Node).

This includes areas of Gottingen Street, Victoria Road, Portland Street, and Wyse Road, which have all developed significant low-income populations, both on these streets and in adjacent areas, due to their relative affordability and access to required services.

While recognizing the need for the city to grow and evolve, we are concerned that, without adequate controls and strict requirements for the inclusion of affordable housing opportunities in these areas, there is a danger that increased development will lead to the displacement of individuals and families that are unable to afford higher rent levels.

Policies 11 (p. 29), and 20 (p.39) include provisions which allow for single room occupancies, rooming houses, and supportive housing, as well as work-live units, all of which are welcome. However, there is no requirement for any affordable housing.

### **Policy Recommendations**

- Include a requirement for the preservation or replacement of any existing affordable housing in the area, coupled with an effective rent control policy which would ensure affordability over time.
- Provide tax relief to property owners for every affordable housing unit made available to the market.

### **Future Growth Node Designation (p. 49)**

The areas specified in this section are largely vacant, representing a rare opportunity for a thoughtful and comprehensive planning framework. As the Centre Plan indicates, these areas have the potential to accommodate “transformative change” (p.49).

And, while the incorporation of objectives related to the preservation of cultural sites (F3), the incorporation of a wide range of housing opportunities (F4), the commitment to a Complete Communities model (F5), and accessible public amenities (F8) are welcome, there is no mention of affordable housing. The only provision (potentially) related to affordable housing in this section is Policy 49 k. (p. 51) which allows for bonus zoning agreements. Ultimately, there are absolutely no assurances that Future Growth Node developments will include any affordable housing opportunities.

### **Policy Recommendations**

- Require an appropriate percentage of affordable housing to be included in any multi-unit development based on data derived from the Housing Needs Assessment, or a strictly defined, fixed term residential monitoring program.

## United Way Halifax Response to Centre Plan “Package A”

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### **Built Form Framework (p. 54)**

#### **Barrier Free Building and Streetscape Design (Section 4.5, p.63)**

Due to the high correlation of low-income levels and physical disability, it is crucial to ensure that housing affordability be coupled with design criteria that facilitate accessibility. For this reason, we are happy to see the inclusion of policy statements 68 a-c (p. 63) which support equity and access.

#### **Policy Recommendations**

- United Way Halifax and the Housing & Homelessness Partnership (HHP) strongly recommend moving toward a policy of universal access in all appropriate circumstances.

### **Parking and Driveways (Section 4.7, p. 65)**

While couched in terms of a pedestrian and environment friendly policy orientation, the reduction in parking requirements for mid to high density residential developments could be a real boon to affordable housing, and is therefore a welcome addition to the Centre Plan. By reducing parking requirements, development costs can be lowered, and savings passed on to future tenants, thereby increasing the viability of affordable housing options.

We encourage the municipality to scrutinize all relevant policy areas under its control with an eye to eliminating any unnecessary and costly development requirements.

### **Culture and Heritage (Section 5, p. 71)**

As stated previously, we believe that diversity and equity are integral to a healthy and resilient community. Tragically, there are many populations that have suffered systemic oppression and been marginalized over generations due to their race, gender, ability, and class. These realities need to be redressed.

In this regard, a commitment to inclusive cultural planning is a much welcome step. Preserving the cultural heritage of all populations within our society communicates a strong message of equity, while also providing opportunities for broad social engagement and understanding.

In developing a thorough and representative inventory of the municipality’s cultural heritage sites, we strongly encourage a thoughtful public engagement process built on values of dignity, equality, and respect.

## United Way Halifax Response to Centre Plan “Package A”

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### Housing (Section 6, p. 82)

Access to safe and secure housing is something we all aspire to. Unfortunately, for far too many HRM Residents, this is an unaffordable luxury. In 2016, over 1,600 individuals stayed in the city’s shelters, while approximately 50,000 others lived in a state of “core housing need”, meaning that the housing they do have is inadequate, in poor condition, and/or economically unsustainable. We must do better.

And, while the Centre Plan does an excellent job of removing many of the regulatory barriers that have impeded the construction of some vital forms of housing, such as secondary and backyard suites (Policy 80-b, p.85), rooming houses and supportive housing facilities, the Plan does not include any provisions which would ensure an adequate supply of affordable housing is made available in the future.

### Policy Recommendations

- Establish a strong and adaptive incentive program (i.e. waiving development fees, streamlined development approvals, professional supports, property tax reductions) to support long-term affordable housing development across the housing spectrum (i.e. for profit, not-for-profit, multi-unit rental, backyard suites, rooming houses, etc.).
- Establish a strong incentive program and supportive regulatory framework in order to promote the development of affordable secondary suites.
- Policy 80-b: (Strengthen Language) **Require** a mix of housing options..... informed by the housing stock assessment process (see Policy 83).
- Policy 80-d: Require that a percentage of all two and three bedroom units be made available as affordable housing.
- Incentivize the development of supportive housing and rooming house facilities in designated Corridors and Centre zones to facilitate access to transit and other services.
- Policy 83 (p.86): (Strengthen Language) The Municipality **will** monitor the rate of housing stock change **on a prescribed schedule** to inform housing development policy.

#### *Special Note:*

*Policies 80 C & D are incredible achievements, both in terms of opportunity and equity – Kudos!*

### Surplus Land (Policy 84-f)

There are few things more fundamental to an individual’s health, happiness, and productivity than stable, quality housing. It is therefore incumbent upon us to devote every freely available resource to ensuring that this opportunity is made available to as many of our fellow citizens as possible.

Until the Municipality meets its affordable housing targets (i.e. 5000 units in 5 years), United Way Halifax recommends that all city owned surplus land within the Centre Plan area should be made available to this purpose.

## United Way Halifax Response to Centre Plan “Package A”

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### **Policy Recommendations**

- Establish a publicly available inventory of all available Municipal surplus lands.
- Establish an RFP process to consider the development of affordable housing, either:
  - on available surplus properties
  - or, with proceeds made available through the market value sale of surplus lands.
- Provide non-profit organizations and potential private sector partners with human resource expertise to facilitate the development of Affordable Housing on surplus lands.

### **Supportive Housing and Shared Forms of Housing - Policy (p.88)**

Supportive housing, rooming houses and other forms of shared housing are critical components within the affordable housing spectrum. Rooming houses in particular are often the only affordable housing option available to an individual before having to resort to emergency shelters or rough sleeping.

We are therefore very pleased with the opportunities made available through Policy 85, which allows for development of these housing forms within all residential zones. We only ask that serious thought be given to any related definitions and/or policies in order to mitigate the negative and discriminatory stigmas that have accompanied these housing forms in the past.

### **Economic Development (Section 7, p.92)**

Poverty is not a choice. Poverty is a trap. And while there are many factors that can make it difficult to break free from a life of poverty, the cruel fact is that a lack of income, in and of itself, can present some of the most difficult challenges. Expanding an individual’s rights to pursue convenient, adaptive, and relatively low-risk entrepreneurial opportunities in their own homes is, therefore, of tremendous significance.

### **Policy Recommendations**

- Establish a business and commercial property tax moratorium, for a period of two-years, following the establishment of a home-based business by individuals with moderate to low incomes.
- Work with community partners to provide skills training and other supports for new home-business operators with incomes below the low-income threshold.
- As the majority of individuals living in poverty rent their homes, investigate how this opportunity may be extended to renters.

### **Mobility (Section 8, p.98)**

Diversifying transportation options and improving route connectivity are important steps in promoting equity of opportunity and leveling the playing field for individuals and families unable to afford the luxury of a private automobile. These objectives are especially significant in light of the recent agreement between the Nova Scotia Government and the Municipality, which is expected to provide some 16,000 Income Assistance recipients and their families with free access to public transit.

## United Way Halifax Response to Centre Plan “Package A”

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We, therefore, wholly endorse the policies and objectives outlined in Section 8 (Mobility) of the Centre Plan, with the following suggested inclusions:

### **Policy Recommendations**

Pedestrian and Cyclist Safety and Comfort (Section 8.3, p.103)

Policy 98 (p.103)

- The Municipality may consider establishing new public street connections to achieve the strategic growth objectives of this Plan, to complete street grid connections, **to improve neighbourhood cohesion within fragmented communities**, and to improve pedestrian access to transit facilities and other destinations.

### **Public Transit (Section 8.4, p.105)**

Policy 99 (p.108) –

I) Prioritize transit service improvements (e.g. frequency, accessibility) in areas with a high percentage of Income Assistance recipients.

### **Environment (Section 9, p.108)**

Improving environmental conditions can dramatically enhance the quality of life of residents in an urban environment, while also serving to remediate the reputations of communities struggling against entrenched negative stigmas. This is especially true in areas with high levels of poverty, where private landscaping if often an unaffordable luxury, where public green spaces are typically lacking, and where apartment blocks and parking lots routinely dominate the landscape.

We, therefore, enthusiastically endorse the environmental objectives and policies established in the Centre Plan, particularly those related to Urban Agriculture, and a Connected Open Space Network, which seeks to (Policy 105-b.) prioritize the needs of high density, under resourced, and growing neighbourhoods; (Policy 105-k.) to improve barrier-free access to parks, community and recreation facilities; and (Policy 105-l.) to increase access and improving public washrooms including adding gender neutral facilities.

It is no exaggeration to suggest that these policies have the potential to profoundly impact the lives of many of the City’s most disadvantaged residents – KUDOS!

### **Implementation (Section 10, p.116)**

#### **Community Engagement (Section 10.1, p.118)**

While the municipality clearly expends significant energy and resources within its public consultation process, some community perspectives remain notoriously hard to access, and some voices almost entirely unheard. These are often the voices of the most disadvantaged members of our society, who may lack the time, the expertise, the means of transportation, the comfort level, the social connections, the childcare, the sense of agency, etc., etc., etc., to take part in the conventional models of civic engagement.

## United Way Halifax Response to Centre Plan “Package A”

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Going forward, we ask that the Municipality do everything it can to establish a process of community consultation founded on principles of access and equity. In so doing, you can ensure that the interests of the vulnerable and the marginalized are represented, and that the city’s decision makers are provided with the information they need to help break the cycle of poverty

### **Incentive/Bonus Zoning (p.123)**

While an important tool in the promotion of housing equity, community diversity, and affordability, Bonus Zoning, as written, does not provide any guarantees that any investments in affordable housing will be made. In fact, representatives of the planning department have indicated on numerous occasions that investments in affordable housing under the existing Bonus Zoning regime have been extremely limited.

### **Policy Recommendations**

- Increase the Affordability Period from 15 to 20 years. This, at the very least, would allow a child born into the unit to reach adulthood before they and their families are forced to leave their home due to increased rental costs.
- Include a requirement to replace in equal numbers any affordable housing lost to development.
- Include a “community benefits” component, which would require the provision of employment and job skills training to low-income residents of the area during development of the site.
- Consider opportunities for transferring Affordable Housing benefits to other locations within the Centre Plan area.
- Consider establishing an Affordable Housing Trust funded by “Cash in Lieu” benefits.

### **Regional Centre Land Use Bylaw**

Definitions – Comments, Suggestions, Questions

**(8) Affordable Housing** means rental housing where housing costs (defined to include rent, heat, and hot water) are at or below 60% of average market rents for similar units, and are leased to low- and moderate-income households that meet the initial household income limit.

*Why does the definition of Affordable Housing only rental units? Why is affordable home ownership not included?*

**Cultural Planning – Please include definitions.**

**Emergency Shelter** means premises providing a person with short-term overnight sleeping accommodations, free of charge.

*As many individuals end up in shelters for months, if not years at a time due to a lack of alternative affordable and/or supportive housing options this definition is misleading and does not reflect the reality.*

**Farmers Market** - Broaden the definition of “Farmers Markets” to include dairy products, grain products, meat, poultry and fish to provide opportunities to more local producers and provide access to a variety of healthy foods.

(92) Halfway House means \_\_\_\_\_.

*Who are you consulting to define this term?*

(219) Supportive Housing means a building that has a permitted residential use and is licensed by the Province of Nova Scotia in accordance with the Homes for Special Care Act, and which provides care in accordance with the license.

*In many circumstances the term “Supportive Housing” has taken on a negative stigma, resulting in discrimination. We ask that the Municipality be mindful of this in defining and using the term.*

## Appendix Q



May 4, 2018

Dear Centre Plan Project Team:

The IWK Health Centre's mission is to passionately pursue a healthy future for women, children, youth and families. We understand and acknowledge the role that the Social Determinants of Health and that the built environment play in shaping the health of our communities. The IWK believes in the power of collaboration and partnership to support initiatives that encourage healthy futures for our communities. The Regional Centre Secondary Municipal Planning Strategy (Centre Plan or SMSP) and the Regional Centre Land Use Bylaw (LUC) present a significant opportunity to promote health and well-being for women, children, youth and families in our region.

We are pleased to see core concepts such as "pedestrians first" and "complete communities" included within the Centre Plan Package A. The focus on people and supporting pedestrian activity helps ensure the design of safe, walkable, and accessible communities. The intention of complete communities including mixed use developments will allow for a greater accessibility of goods and services in the communities where people live, work, shop, learn and play. We encourage the city to look for opportunities within Centre Plan Package A to determine where alcohol and cannabis establishments are permitted, and where they are not. The intention being to protect children and youth from seeing alcohol and cannabis everywhere by providing significant separation distances in areas where children and youth learn and play.

We know that housing directly affects the health and well-being of children, youth and families. As a member of the Housing and Homelessness Partnership, the IWK promotes the importance of adequate housing as a protective factor for the physical, social and mental health and well-being of children and youth. We are pleased to see that the Centre Plan Package A recognizes the importance of providing incentives to encourage the development of affordable housing, including the use of bonus zoning for density above 3.5 FAR, with 75% of the proceeds being directed towards affordable housing projects. That being said, we are concerned about the short length of the Minimum Affordability Period of 180-months. We encourage the city to explore other incentives or opportunities to extend the Minimum Affordability Period.

Overall, the IWK is supportive of the overall direction, and are pleased to see that Package A provides several policies supportive of improving the health and well-being of Halifax residents. We are pleased to provide any additional information or support, and look forward to continued opportunities for engagement.

Thank you,

**Original signed**

Sarah MacDonald  
Primary Health Manager  
IWK Health Centre



May 4, 2018

Jacob Ritchie and Carl Purvis  
Halifax Regional Municipality

Via e-mail: centreplan.ca

We want to acknowledge the effort the Centre Plan Team put into scheduling public engagement sessions and establishing the Centre Plan StoreFront therefore making access to planning Staff very convenient. Park to Park members have attended many of these sessions and have spent many hours reviewing the documents provided on the Centre Plan. We offer the following comments on the Centre Plan, 2018.

From the first (draft purple copy) we have been generally supportive of the Centre Plan. We have focused on the areas of our neighbourhood encompassed by the South End Higher Order Residential (HR) designation for obvious reasons. We are sensitive to the attention Wellington Street has received over the past few years and seemingly in the Centre Plan as well. In response to the first draft we requested of both the planning team and CDAC that Wellington Street be designated HR on the west side and Existing Residential ER on the east. This would reduce the tunneling effect the street would incur if development of 6 storeys on each side would be permitted.

With the release of the revised draft Centre Plan, the HR designation has been expanded into two divisions, each with different proposed requirements for uses, setbacks, landscaping, etc. The draft CP has proposed HR1 zoning for most of Wellington with HR2 applied only to the two 12+ storey, 50+ year old buildings and the five storey condos on the east side. Our understanding is that going forward they would be held to the CP heights and GFARs to a maximum of 8 stories. While this approach still leaves room for development on both sides of the street, the established Heights and GFARs should keep additional density to a minimum. With a current population of approximately 700 and the possible addition of at least 400 more with the Urban Capital Development and the possible Banc Development north of Peter Green Hall on a narrow two block street, we suggest that Wellington Street, in particular, has provided sufficient density.

Judging from the maps it appears that this approach is the same for all HR designated zones. Obviously the current site specific amendment proposals will change some of

the designated heights prior to the adoption of the plan.

Our association, Park to Park, believes more consideration be given to the various elements of HR such as permitted uses, setbacks and landscaping. For example, under HR the maximum lot coverage is 50%; however, there is no required side yard when adjacent to a single family home, an allowable use in HR-1. Also, a 6 storey building next to a single family home has no more requirement for landscaping than if it were building next to another 6 storey building. However, if the two storey house was in the ER zone, setbacks, landscaping, etc. would be required. In terms of commercial uses for HR-2, a 60- seat pub or a restaurant could exist right next door to a single family home in HR-1. We find that the uses in HR-2 are too permissive and that the removal of the midblock restriction should be reinstated. We would recommend that uses such as bars and restaurants be on corners only as in the original draft not mid-block.

The identification of zones and corresponding regulations does not fully take into consideration the existing built form and history. If we look at the Highfield Park area and the old South end we see two very different entities based on history and built form. Highfield Park is a relatively new area with a high level of multi-unit buildings built right from the beginning with very few single family homes interspersed among them. The South end, on the other hand, is a very old established part of Halifax with a non-contiguous mixture of housing forms within and between streets. It reflects everything from workers homes to mansions. It became multi-unit due in part to bad planning decisions through site specific amendments and non-conforming uses. It appears the CP, as is, could eventually change the fabric of the old south end by ignoring its history, diversity and its trees. The lowest common denominator and a move to uniformity don't always work for the betterment of a city.

We would ask that more consideration be given to the history and character of the South end and not make it look like Highfield Park. The character of the neighbourhood seems to be lost in the goal of reducing the number of planning zones.

In section 2.4 under Strategic Growth it says “It is intended that most of the growth will occur in the form of mid-rise buildings, with high-rise buildings located strategically within Downtown Halifax, Downtown Dartmouth and Centres”. It is silent on the addition of high-rises to COR and HR even though it appears 8 stories is permitted in both.

We would support the stated view that high rise development should occur in the downtown and Centre zones , not in HR or COR zones except for lots that have previously been developed with a height >20 m. As such, we suggest that the HR zones should not be designated high rise specifically but rather remain midrise with exceptions permitted to 8 stories where high density buildings already exist. We continue to support a 6 story maximum height with the noted exceptions..... currently identified on height/ GFAR map.

## Appendix R

These proposed /selected high rise sites within the COR or HR should be better identified on the height map ....and a rationale put forward as to why these areas are appropriate for future higher density development (8 stories). For example, already exist ...etc.

The HR high-rise designation is a significant change from the previous draft and terminology is somewhat inconsistent throughout the document with regard to the addition of high-rises to the COR and HR zones. If both COR and HR are to accommodate "high-rise" development > 20m or (8) stories only by exception as we suggest, it should say so more clearly up front.

Initially the corridors were seen as adding both density and commercial activity at street level and the HR district was seen as more specifically residential and pedestrian orientated ...being close to transit networks etc. In the new draft document it seems they are very similar in allowed commercial uses, the differences being drinking establishment...no seat restriction, hotels and pawn shops. We support those differences but as stated earlier we find the current permitted uses to be generally too permissive in the South end HR zone and would ask that more thought be given to an appropriate level given the non-contiguous and eclectic nature of the area.

We also wish to point out a concern regarding parking requirements. The Corridor zone which has a maximum lot coverage of 80% "is located .....in proximity to lower-density neighbourhoods." This zone has no requirement for parking despite being identified as a residential and commercial zone. The requirement of parking for this zone will now become the burden of the residential streets nearby, disrupting their enjoyment of their neighbourhood. We appreciate that HR has a requirement of 1 space for every 3 units but feel the obligation of abutting streets to COR to handle increased parking is inappropriate.

While we appreciate the commitment to a more pedestrian and cycling orientated use of our streets, the lack of a requirement for parking in COR and one spot for every three units in HR, may be insufficient as the city transitions.

Access to sunlight is an important element of a city's livability. While shadow studies may be taken into account for parks, it appears that removing sunlight access due to increasing the numbers of mid and high-rise buildings is considered a non-issue in the Plan. This loss of sun and change in livability for people currently living on streets where higher density development is approved is generally not taken into account.

Due to Wellington Street's closeness to Gorsebrook Park we are sensitive to comments in the Centre Plan where parks are mentioned. We note in 4.2.1, Policy 64, that Gorsebrook Park is not included as a Park with shadow controls. We ask that it be added to the list.

In addition, there appears to be no specific identification of any new parks to offset the

proposed increase in density in any area other than under large lot accumulation. Otherwise it is unclear if the city plans to purchase parkland or if parks will be mandated in any zone other than under development agreements for large lots. We strongly recommend that more attention be given to providing park space in areas where higher density is being directed.

Is it possible that density bonusing or grouped density bonusing funds (25%) for an area be contributed to offset the purchase of new park land or the upgrading of existing park land?

And finally, a few questions:

- What is the rationale for a 15 year limit attached to affordable housing through density bonusing?
- Will development agreements continue to be approved by Regional Council?
- Why is St. Andrews United Church, at the corner of Coburg and Robie, zoned COR and other churches in the area zoned Institutional? It appears that St. Andrews will be included in Package A but the other churches will not be handled until Package B is introduced? Is this an error in the interactive map?
- If you have a block of properties in any zone that have different GFAR's and Heights, which guidelines will be applied when an accumulation of lots is permitted for future development?

The revision to the planning guidelines for HRM is an onerous task for all concerned. We hope you take our thoughts and recommendations into consideration when preparing the next revision to the Centre Plan documents.

# Original signed

Chris Annand and Pat Whitman  
On behalf of Park to Park Community Association.

Draft Centre Plan  
Input 9April.018  
Frank Palermo

In the spirit of being both brief and helpful, I will describe 5 areas of interest and provide a recommendation for each.

If it will help, I would be happy to discuss the specifics and assist in finding new strategies for moving forward.

The 5 areas are:

1. Transit
2. Bonus System
3. Approval Process
4. Streetscapes
5. St. Pat's Alexandra School Site

## **1. Transit and parking**

The Centre Plan is written as if we had a long term transit plan that would make Halifax a transit oriented city. If we had such a vision then land use/density/affordable housing and transit could be seamlessly connected. Then we could reasonably reduce or illuminate the parking requirement for new development. We could take street parking away and make room for continuous bikeways. We could reduce the traffic function of streets and have more room for wider sidewalks. The social, open space and marketplace function of neighborhood and city wide main streets could flourish.

The problem is that the Integrated Mobility Plan makes a compelling case that this is how it should be. It accepts however that there will be little or no change to the current modal split in the near future. Like the Moving Forward Together plan it accepts that we have to be content with targeted improvements through “priority measures”, “corridors”, “incremental” changes and more studies even as we also “improve” roads.

In this context, it’s unreasonable to illuminate or reduce the parking requirement.

Neighborhoods close to main streets where the Centre Plan is proposing bigger buildings, more people, more traffic and less parking can justifiably be worried about their community and safety on the street. Without great transit, more active transportation and better streets, it’s difficult to convince a community that they should welcome higher density.

As you may know, there is a community led initiative called LEADING with TRANSIT (that includes more than 20 different organizations from across HRM). The group accepts the foundation established by the IMP and the MFT plan. But LEADING with TRANSIT is also different in 4 important ways:

- a) in scope
  - the timeframe is much longer (50 to 100 years as opposed to 5 to 15)
  - the boundary for transit extends to all of HRM and beyond to the commuter shed
  - the targets in terms of population growth and ridership
- b) in seeing transit as a complete system and public service which is essential to the vision for HRM

- c) in seeing and building transit as permanent so the city and development and streetscapes can be built around it
- d) in considering transit as a long term investment. LEADING with TRANSIT is based on the premise that we need the vision now and we have to start building it immediately. So development (Growth Nodes/Centre Zones/Corridors) happens in the right places and every development can contribute to it.

## **Proposed recommendation 1**

**Allocate funding (up to \$100,000.) to support LEADING with TRANSIT in developing the concept, determining an investment strategy, and working with the community to ensure that there is broad understanding and support for the idea. LwT will report to Council within 8 months.**

## **2. Density Bonusing**

Bonusing is a major aspect of the draft plan. Before approving the proposed regulations it deserves a much more careful and nuanced review from the private sector as well as from the public/community interest point of view.

When more than one third of the development potential on many sites is based on the bonusing system we all have to be certain that this is the right way to do it. My experience in other cities is that the eligibility for a bonus density tends over time to simply be reflected in an increase in the underlying property value. As a consequence developers reasonably argue that they have to build to the upper density limit. Developers are also reluctant to spend any funds on amenities that don't directly increase the value of their property. Mostly and reasonably they want to get the maximum bonus density at the lowest possible cost

This raises many interesting questions like - should "public space", amenities or art within a building be bonused or should we just require more from all developments? Wouldn't it be reasonable for the community to benefit directly from the increased value that comes from allowing higher density? Do we have to encourage better development or simply expect it? So there is a discussion to be had about intentions and approach. We should also think more about what is bonusable. For instance I can see that affordable housing, if it's not required, could be bonused. On the other hand, is it useful/reasonable from a community perspective to put a time limit on it. How would such a deal really be negotiated and how does it affect affordability. Why does the bonus system encourage public amenities within the development site. Would there not be greater public benefit and maybe even more benefit to the developer in asking developers to contribute to improving the streetscape or to contribute to public transit.

How is the bonus system administered? Who decides what is acceptable on a given site? Or what "art" means ?

## **Proposed recommendation 2**

**Establish and convene a roundtable/Task Force group to test, refine and recommend what the bonus system should do, how it works and how it should be administered.**

### **3. Streetscapes**

- a) Building envelopes define the street as opposed to the street shaping the envelope. The streets as places with a movement, open space, social space and marketplace functions, with a given width, orientation and history should more clearly serve as the base for defining regulations about use, height, setbacks, increment of building.... In the Plan there seems to be an arbitrariness (almost site specific bias) in the boundaries between zones. I would emphasize more the principles which have to do with creating the public streetscape or protecting a certain environmental quality or simply being a good neighbor. This might result in zones that are not so site specific, in boundaries that tend to be more in the middle of a block as opposed to along a street. It may also mean that the building wall, total height and the footprint of buildings above the street wall on the south side of the street might be different from those on the north side.
- b) The building envelopes, streetwall representations and the regulations appear to me as very crude, too general (as in they could be in any city), too bland (as in the building walls are too long).....There should be more room for individual expression and smaller increments of development . Buildings should be much slimmer above the 4<sup>th</sup> floor.
- c)The buildings you show and the guidelines that I've seen lack much of the texture and nuance that would make a more colorful, fit with our climate and our scale: Where we know there is transit (once we know that) it should be reflected in the buildings. Where residential exists close to grade we might insist on individual entrances from the street....

What you have is a great start for an informed and creative discussion that might fine tune the zone boundaries and the regulations for development.

### **Proposed Recommendation 3**

**Convene a 2 day Design Forum to fine tune each of the zones and report back to Council.**

### **4. Approval Process**

Base on my understanding and experience with the process established for the Downtown Area, there are 2 broad concerns with the proposed process.

- a) public consultation needs to be redefined, reconsidered and somehow made useful to the community, the applicant and the Design Advisory Group. As it is, it seems to me largely a waste of time and effort.
- b)the Design Advisory Group needs more credibility, needs more understanding of local urban design issues/direction, needs to be more open/engaged with the community and needs to have less (no) conflicts of interest

### **Proposed recommendation 4**

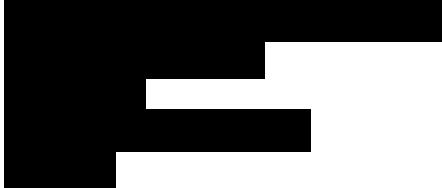
**Bring HRM staff, development industry/architects /consultants, selected community representatives, current design panel members ... together for a 1 day workshop to recommend how the process can be expedited and improved.**

### 5. St Pat's Alexandra School Site

As I understand it the St Pat's Alexandra site is shown in the Plan as HR2. I know because I was somewhat involved, that this site has a long and difficult history. It now seem that a parcel of public land which is currently classified Park and Institutional is effectively being rezoned to HR2 without any specific community engagement in the process. I thought the city charter requires Council to consult with the community in the disposition of public land. While there might be a technical reading of the situation which holds that the community has been involved, I would suggest that in any community, particularly this one it is not sufficient to say that possible engagement in the Centre plan is sufficient.

I'm happy to help in advancing any of the issues, possibilities and recommendations suggested here.

Frank Palermo



## What does sustainability mean to us?

The Ecology Action Centre is committed to sustainable growth for the creation of a more environmentally-friendly city in the Regional Centre of Halifax Regional Municipality (HRM). The Centre Plan, which aims to determine how and where the next 18,000 units will be located, is integral to the development of greater density in the Regional Centre and we applaud the work that has gone into achieving this goal thus far. Regional Council has acknowledged that Climate Change poses a threat to the safety of Haligonians and the longevity of our City, and have begun to introduce legislation to protect us from sea level rise and extreme weather events. Without a sustainable, resilient future Plan for Halifax, we risk our collective future and that of generations to come. To create a sustainable city, we must:

- Have a reliable, low-impact transportation system which prioritizes people, not cars;
- Build energy-efficient buildings that can withstand the tests of time and give back more than they take away;
- Prioritize the retention and expansion of natural assets that aid in ecosystem and watershed protection;
- Protect heritage and cultural assets that make Halifax attractive to residents and tourists; and
- Ensure that all citizens have equitable access to amenities and safe, affordable housing.

The way that individuals live day-to-day in Halifax has a direct impact on the environment. Where we live, work, go to school, and how we get between those places, all play key roles in creating a sustainable city. The link between sustainable cities and density has been well established in research. In collaboration with existing Municipal and Provincial policy, it is crucial that we work together to make it affordable and enjoyable to live in the Regional Centre, close to everyday needs.

The Regional Centre is already the densest area of HRM by population, and we will be experiencing population growth that needs to be accommodated with progressive, sustainable practices. With aging infrastructure and low-density sprawl causing long commute times and necessitating car ownership, it is imperative that we as a municipality shift our development patterns and begin to provide options for everyone to live affordably and comfortably in higher-density neighbourhoods.

While we have been satisfied with the directives of the Centre Plan and believe that the Visions and Principles are in line with the development of a sustainable city, we are concerned that the most recent draft of the Secondary Municipal Planning Strategy (SMPS), the Land Use By-law (LUB), and the Design Manual (released in Package A), do not take a strong enough stance on enhancing sustainable growth in the Regional Centre, while respecting culture and heritage and protecting vulnerable communities.

In Nova Scotia, we seem to still suffer from Provincial have-not syndrome, a mindset caused by being one of the less-wealthy provinces in Canada. This has resulted in our acceptance of, and indeed, promotion of meeting the bare minimum of success; in this case, it has allowed "Growth at all Costs". We need to combat this attitude, and HRM's Centre Plan is the perfect place to start. The Centre Plan needs a vision strong enough that it can withstand debate and out-dated arguments. We need to have the courage to believe that there are city builders with our best interests at heart, and to reject projects that do not fit into our vision. Our experience in the past several years has been that developers will come back with better plans if they are sent back to the drawing board. We need to rely on this experience and hold all city builders to a higher standard in order to confidently implement our collective vision for Halifax and Dartmouth. This is how we create a sustainable city; this is what sustainability means to us.

The Centre Plan policies largely recognize that the development of communities happens parcel-by-parcel, but it is integral that visioning is done for neighbourhoods at large. This is currently not included in the Policy, begging whether amenities that are needed in particular neighbourhoods will be encouraged or identified in any manner, or whether the entire process of building a Complete Community will be left up to the private market. If the Vision and Principles were strong enough throughout the Centre Plan, it likely would not require measures like prescriptive design standards, height restrictions, and incentives for good development. With these features, we risk underdevelopment and an inability to support the Complete Communities we intend to build with a substantial tax base. Ideally, the guidelines and visioning would be strong enough that those making proposals would know what is acceptable and what is not, and those making decisions would be able to easily identify proposals that deserve approval. Under the documents released through Package A, this is not the case.

# Appendix T

Part 1 of this document, *A Vision for Centre and Corridor Zones*, has been divided into four subsections: Mobility, Maintaining Fabric and Character, Public Amenities, and Future Climate Scenario. Each subsection pertains to elements of visioning for a sustainable future with Complete Communities, Culture, and Heritage at the forefront. Part 2 of this document, *Implementation*, is comprised of five subsections: Registered Culture and Heritage, Higher Order Residential Zone, Density Bonusing, Mobility, and Complete Communities. A complete list of recommendations throughout the document can be found in *Appendix A*. A complete list of errors, inconsistencies, and concerns can be found in *Appendix B*. A model Vision for the Gottingen Street Centre can be found in *Appendix C*.

## Part 1: A Vision for New Centre and Corridor Zones

Following the four Visions and Principles introduced in Chapter Two, Chapter Three of the Draft SMPS introduces three new urban structure designations: Centre Designation, Corridor Designation, and Higher Order Residential Designation. These zones are key streets and sites where greater density is encouraged following tenets of the Visions and Principles. What is lacking for these designations is individual visions that acknowledge their differences: what sorts of amenities are required in each to create a more Complete Community, what cultural and heritage features need to be maintained, and what existing and future modes for transportation are prioritized in each individually. The “Vision for New Growth Designation Zones” will be explored through four topics: Mobility, Fabric and Character, Public Amenities, and Future Climate Scenarios. Each of these is followed by subsequent recommendations for changes or further visioning that must be completed.

### Mobility

There needs to be a clear connection between the Integrated Mobility Plan (IMP) and the Centre Plan. Each of the Centres and Corridors present distinct mobility advantages and challenges which are explored and planned substantially within the IMP. While the intention of Centre Plan is to encourage the growth of Complete Communities in the Regional Centre, it is unclear, due to lack of specificity and cross-referencing between Centre Plan and the IMP, what the mobility vision for each of the Centres or Corridors might be. Each of the Centres and Corridors are different in terms of the purposes served for transportation, yet they all fall within the same category in the Centre Plan. For example, the present function of transportation for Quinpool Road and Wyse Road present different deficiencies – namely that Quinpool Road largely benefits from a human-scale pedestrian realm and only a two bus routes, while Wyse Road has less of a pedestrian realm but plays host to the Bridge Terminal. The other three Centres, Gottingen Street, Robie Street/Young Street, and Spring Garden Road, likewise have unique mobility functions that are not acknowledged or accounted for in the SMPS.

**Recommendation 1: Each of the Centres and Corridors needs more specific Policies with regards to LINK or PLACE designation. This specificity will help to qualify each Centre or Corridor’s deficiencies and/or advantages. Where this is covered by the IMP, explicit reference should be made so that the reader can draw connections between the Centre Plan and the IMP. These policies could also include future plans for streetscaping projects and reference to what elements are important in maintaining the current transportation functions of differing Centres and Corridors.**

**Recommendation 2: Update Policy 99 to include a “shall consider” clause, instead of “may consider”. Furthermore, clarify what is meant by “Transit Priority Plan” in Policy 99.**

### Maintaining Fabric and Character

While the objectives in *Chapter 5: Culture and Heritage* cover conservation of designated heritage assets, we are concerned that elements of this Chapter are not found throughout the new Zones. If Culture and Heritage, two integral elements of liveability in Halifax, are separated in their own chapter, they will consistently be sacrificed and thought of separately. The issue with separating Culture and Heritage is that it is not solely the designation of historic properties and historic neighbourhoods that is at stake; it is about how a streetscape creates the feeling of culture and heritage when you’re walking down it. The Centre Plan has incorrectly defined Culture and Heritage. This must be how we treat it, especially in a city like Halifax/Dartmouth, where Culture and Heritage have long been the amenities that bring new residents in and encourage existing residents to stay.

The existing character, fabric, and heritage of the Centres, Corridors, and some Higher Order Residential zones stand to be lost entirely under the existing proposed Centre Plan. Unfortunately, this risk has commonly and incorrectly been conflated with allowing tall heights along Centres and Corridors. In reality, the threat is posed largely by lack of context in development and design, and lack of transparency and planning the maintenance and improvement of

# Appendix T

streetscapes and general liveability of neighbourhoods. This will be further explored in the *Public Amenities* section below.

*Objective CH2* appears to pertain most to heritage features beyond designated heritage buildings. It states that HRM should aim to “Preserve and enhance places, sites structures, streetscapes, archaeological resources, cultural landscapes and practices which reflect the Regional Centre’s diverse evolution, built heritage, and culture.” We are concerned that far too little emphasis has been put upon preserving and enhancing places and streetscapes in the SMPS, the LUB, and the Design Manual. Preservation is especially crucial for locations where affordable housing and affordable commercial/office space is located, and where the dense parcel fabric with smaller lot sizes contributes to the overall heritage character, streetscape, and liveability of a neighbourhood. On the other hand, enhancement of these elements is especially important in terms of creating Complete Communities in existing neighbourhoods. While this is a widespread concern throughout the SMPS, LUB, and Design Manual, a complete list of the most concerning places and streetscapes can be found in *Appendix B* of this document.

In order to encourage the growth that is necessary while retaining the cultural assets that make Halifax a great city to live in and to visit, the uniqueness of neighbourhoods on the Peninsula and in Dartmouth need to be recognized and stated within the policy. In light of this, a more in-depth description of existing uses, amenities, built environment, heritage characteristics, and other elements that contribute to neighbourhood uniqueness and turn streets into destinations is needed. *Policies 13-17*, which pertain to the individual Centres, require considerably more detail to guide landowners and developers in making proposals that are well-suited to the neighbourhood and take heed of the particularities that will maintain and enhance a Complete Community in that place. Likewise, *Policies 18-20* should include specifications pertaining to each Corridor that help to explain the parcel fabric, the transportation functions, and the existing uses, in order to better inform developers and decision-makers. Each of these requires a Visioning Statement, a mock version of which can be found in *Appendix C* of this document.

**Recommendation 3: Explore introducing protections for parcel fabric of specific Centres and Corridors that have historic, social, and economic value in their neighbourhoods. If this is infeasible, certain key locations should be removed from Centre and Corridor zones.**

**Recommendation 4: Explore the introduction of incentive related to adaptive reuse and renovation within historically residential neighbourhoods that will be designated CORR-2 or CORR-1 zones.**

**Recommendation 5: Amend Centre and Corridor policies to include greater details specific to each Centre and Corridor, which will help developers and decision-makers alike to enhance the character, heritage, and amenities in each area.**

**Recommendation 6: Identify internal municipal intentions for current and future projects with the use of existing municipal assets. This should include proposed future parks to accommodate new residents, streetscaping projects, community centres, etc. Connections should be drawn between this and the Urban Forest Master Plan, to ensure that development and naturalization happen cohesively.**

The Design Manual is a good tool to help direct the character and style of development. However, it also lacks sufficient differentiation amongst neighbourhoods. The implementation of *Objective CH2* appears to occur primarily through the Design Manual (2, page 9) – *Design that Reflects Community Context*. Contextual Design is generally subjective and open to interpretation.

**Recommendation 7: In the Design Manual, context should be explicitly stated for each Centre and Corridor recognizing the uniqueness of their built form in order to provide guidelines that will help the design review team to determine whether a proposal is contextual for the street/neighbourhood.**

There's no “in between” guidance to indicate to creative developers what, if done remarkably well, might be acceptable, yet is non-conforming (i.e. if they go above and beyond in contributing to the Complete Community in the neighbourhood of their development). The only guidelines for this are the broad statement on “Complete Communities” and the preambles from each Centre and Corridor section, and the Design Manual that does little to differentiate between character in different Centres and Corridors. Neither of these provides actual definition of what “sustainable, Complete Community” developments might entail, despite reference to these principles throughout Centre Plan.

# Appendix T

**Recommendation 8: Introduce sufficient differentiation through policy in terms of existing character and fabric of each Centre and Corridor that will help future decision-makers to deal with non-conforming proposals. This should recognize that some non-conforming proposals might help to contribute to Complete Community development.**

Finally, many policies as they exist will function to discourage infill development, which should be a key contribution of the already dense Corridor neighbourhoods. The identification of underutilized sites for Higher Order Residential Zones have missed key areas that should be incentivized for redevelopment and have not encouraged sufficient infill on identified lots due to lot coverage maximums. Based Section 152 of the LUB, the majority of onus to accommodate parking is put onto smaller developments. This is counterintuitive to encouraging new developers and creativity in shared housing and multi-unit residential buildings. Furthermore, this is contrary to the directives of the IMP, which aims to prioritize active transportation where possible. By making it easier to park, it necessarily becomes easier to own a car.

**Recommendation 9: Amend Section 152 of LUB to remove requirement of parking on four or less unit dwellings.**

**Recommendation 10: Amend LUB Section 106.1(c) to introduce more appropriate lot coverages depending on individual situations for HR-2 and HR-1 zones. In order to accommodate sufficient density on these larger sites, maximum lot coverage should not be below 80%.**

## Public Amenities

A noteworthy and concerning omission from the SMPS document is policy concerning public amenities. The intent of the Centre Plan is to plan for the next 30,000 residents in the Regional Centre. While re-zoning and increased density allowances have shed light on where these new residents might live, the Plan is silent on where these residents might enjoy public outdoor space, what grocery store they will have access to, or any other countless amenities that create liveability within and equity amongst neighbourhoods.

*Objectives CE1 and CE2* read as such, respectively: “Support intensification of a mix of residential and commercial uses that offer a variety of housing opportunities, a variety of goods and services needed by residents, and access to transit”; “Encourage complete main streets within Centres that prioritize pedestrian comfort through building and streetscape design for people of all ages and abilities”. These goals are commendable, but it is very difficult to determine whether the SMPS, LUB and Design Manual have met these goals. While the Design Manual and the LUB take steps towards prioritizing pedestrian comfort, like introducing new standards for step-backs, set-backs, landscaping, street walls, etc., what is missing is how amenities necessary to a growing population will be accommodated by new development. This follows from the lack of identification of amenities needed in growing communities that was explored in the *Fabric and Character* section of this comment. For example, the Quinpool Centre is already diverse commercially and would benefit from greater access to green space, natural features and residential density; whereas the Spring Garden Centre is primarily residential and could benefit from a new grocery store.

If those making development proposals do not know what sort of amenities are needed in the area, it is much more difficult to make a proposal that caters to the deficits of the community and obstruct it from becoming a Complete Community. For instance, if a Centre or Corridor is identified as a food desert, the right choice for the proposal may be to offer one or two large commercial spaces instead of several small storefronts. Similarly, if an area lacks public outdoor space, a good proposal would likely introduce easements that add to outdoor space which can be accessed by future tenants and the public. If the Centre Plan is unclear on what types of amenities are needed in each neighbourhood, it follows that development proposals will fail contextually and do little to add to the neighbourhood. On the other hand, if a strong vision, background context, and design context are given, coupled with neighbourhood-specific needs for building a Complete Community, development proposals can be written to cater to the needs of particular neighbourhoods and be allowed space for creativity within this mandate. For an example of necessary context for encouraging the growth of complete communities, refer to *Appendix C* of this document.

**Recommendation 11: Create and release a reference sheet that links Policies in the SMPS with the By-laws and Design Manual that enforce these Policies.**

**Recommendation 12: Conduct online surveys and forums to allow residents from individual neighbourhoods to rank their amenity needs and provide this information to developers upon their notification to the Municipality of intent to make a development proposal.**

# Appendix T

## Future Climate Scenario

Keeping in mind that we intend to build a prosperous and liveable HRM, it is crucial that we plan for resiliency and longevity that will prepare us for and protect us from the negative impacts of Climate Change. In theory, we would like to build a city and buildings within it that will last for one hundred years or more – we cannot possibly know what the climate will be like in 100+ years, therefore we need to begin taking measures now to pre-emptively prepare. This is particularly crucial where it pertains to stormwater management and the impacts on wind and sunlight.

Furthermore, an explanation and information chart linking Centre Plan policy with other municipal environmental and sustainability policies is necessary in order to complete the vision for a sustainable city. For instance, *Objective 53* reads “Reduce the Regional Centre’s overall impact on the environment through the advancement of sustainable building design, district energy, renewable energy sources, composting and recycling,” yet there is no guidance regarding what is currently being implemented or future plans for fulfilling this objective through Provincial and Municipal policies other than the Centre Plan.

In the Design Manual, a suggested list of “high-quality, durable, and sustainable development techniques and materials,” in order to fulfill *Urban Design Goal 3A* would be helpful in encouraging motivated developers to explore unfamiliar techniques and materials. This should translate, where possible, to requirements in the jurisdiction of the municipality, such as paved surfaces, landscaping, and green roofs.

**Recommendation 13: A wind study needs to be completed for all Centres and Corridors as an element of the Centre Plan. This study should require stringent wind mitigation under the assumption that wind severity will increase, especially in high-density areas with tall buildings.**

**Recommendation 14: A shadow study needs to be completed for all Centres and Corridors as an element of the Centre Plan. This study should include measures for prolonging sun exposure in high-density neighbourhoods and retaining a streetscape with maximum possible sun exposure.**

**Recommendation 15: Include provisions to update the Centre Plan with the future Building Code standards that will contribute significantly to the sustainability of future buildings. State intentions for implementation of these measures through the Centre Plan and build cohesion between Centre Plan sustainability practices and the Building Code.**

**Recommendation 16: LUB Section 149(1) requires that all parking lots (exempting low-density dwellings) must be surfaced with hard material. Amend this LUB to require permeable surfaces and sustainable materials used wherever a parking lot is surfaced with hard material.**

## **Part 2: Implementation**

Ensuring that the Regional Centre is transformed or enhanced to become Complete Communities offering excellent amenities and an unparalleled pedestrian experience relies upon strong implementation. In some areas, the SMPS, LUB, and Design Manual are thorough; but in others, they lack clarity and do not provide a complete vision of how implementation will be carried out. Part 2 is divided into five subsections: Registered Culture and Heritage, Higher Order Residential Zones, Density Bonusing, Mobility, and Complete Communities. Each subsection features some broad directives and some precise changes needed in order to improve implementation.

### **Registered Culture and Heritage**

Existing and future Heritage buildings and districts require a strong commitment from the Centre Plan for ongoing protections and investments, with mind to the fact that these assets are often undervalued. If HRM continues to undervalue our Heritage assets, we risk the liveability of our city and the unique attractions we provide to tourists and potential new residents. While generally we feel that heritage and culture should be a theme throughout this Plan, it is clear that the Centre Plan Policies and Objectives pertaining to designated Heritage buildings and districts are an improvement on the existing policy.

In light of the importance of heritage to the future of our city, it is crucial that we make intentional and purposeful moves to protect all of our assets. This includes showing commitment to the preservation and restoration of heritage by ensuring that projects are sufficiently funded in such a way that encourages adaptive re-use and restoration.

# Appendix T

**Recommendation 17:** To improve and implement Objective CH5, *Chapter 5: Culture and Heritage* should clarify what types of future programs (to incentivize heritage conservation) will be explored and implemented.

**Recommendation 18:** Bearing in mind that Culture and Heritage are assets that cannot be undervalued, the Centre Plan should make recommendations for budgetary allocation for each Centre and Corridor, in order to ensure that adequate investment is made to heritage preservation in key growth areas.

## Higher Order Residential Zone

Many Higher Order Residential sites offer excellent opportunities for densifying neighbourhoods and improving local amenities. However, there are some fine-grain neighbourhoods that are zoned HR-2 under the LUB which stand to be consolidated into large plots of land. This risks diminishing the fine-grain block structure and pedestrian experience that is important to liveability in residential areas. Particularly concerning are certain areas in the South End (i.e. Wellington Street, Kent Street, Tobin Street, Coburg Road) that have heritage value and certain plots in the North End (i.e. Gottingen Street at Charles Street/North Street) that offer a substantial number of affordable housing units. The HR-2 and HR-1 zones are meant to incentivize redevelopment of underutilized parcels, yet some sites were included without consideration of unique needs in the neighbourhoods in which they are located.

A complete list of all HR-2 zoned lots that require re-examination is contained in *Appendix B* of this document.

## Density Bonusing

The efforts put towards Density Bonusing have been long awaited. Our primary concerns with this section of the Land Use By-Law are the regulations around Cash-in-Lieu, the location requirement for public benefit, and the lack of transparency concerning the monitoring of affordable housing.

Section 197(f), pertaining to Cash-in-Lieu takes steps to discourage developers from contributing Cash-in-Lieu of a public benefit. This is a missed opportunity to build public equity in communities that will be accommodating a great deal more density. If there is a process in place, that allows choice and directs cash in lieu to somewhere specific, then the rules and opportunities are clear. (i.e. Green roofs policy in Toronto).

**Recommendation 19:** Introduce a collective pot of Cash-in-Lieu contributions for each Centre to be disseminated based on public engagement and evaluation of amenity gaps, every (x) number of years. Introduce a Committee of Council to manage this procedure and allow for consistent community feedback and contribution on this topic in each neighbourhood.

**Recommendation 20:** Amend Section 198.3(a) to allow public amenities to be located within 500 metres of development site, in order to allow for maximum benefit from public amenities, (i.e. if a parkette does not fit on the development site, but a small lot could be purchased nearby for the same amount, this should not be discouraged).

**Recommendation 21:** Significantly more detail is required for the Affordable Housing density bonus option. Specifically, monitoring and management processes must be determined in order to ensure that the policy is equitable and precise.

## Mobility

We recognize that the IMP and Halifax Transit will implement new transportation policies, however we feel that the Centre Plan SMPS and LUB does not make specific enough connections between these two plans, particularly pertaining to Transit Oriented Development (TOD). The IMP defines TOD as “an approach that integrates land-use planning and transit, encouraging the development of compact, complete communities with a transit hub or corridor,” (IMP, p. 49). While many of the objectives of the Centre Plan are in line with TOD (i.e. focusing high-density development in areas with good transit access), this term is not used in the Centre Plan. This contributes to the perceived lack of transparency in density decision-making that has occurred, and would help to identify and solidify the vision for each of the Centres and Corridors by better understanding their transportation functions.

**Recommendation 22:** Provide clear connections between IMP and Centre/Corridor designations using the term “Transit Oriented Development”.

**Recommendation 23:** Draw connections between Figure 10: Potential Transit Oriented Communities (p.50) and Figure 20: Proposed Transit Priority Corridors (p.103) in the IMP, and the Centre and Corridor zones.

#### Complete Communities

Implementation of Complete Communities as a theme is lacking throughout the SMPS and the LUB. New Centres are slated to accommodate the majority of growth in the Regional Centre and need to be the heart of the neighbourhoods around them in such a way that creates a Complete Community. Attempting to create new residential and economic hearts in neighbourhoods without ensuring that pedestrians are prioritized on these streets risks allowing car-oriented main streets to persist on in the Regional Centre. Yet according to *Schedule 6* in the LUB the Robie Street Centre and the Wyse Road Centre are not required to become pedestrian-oriented streets.

**Recommendation 24:** Amend *Schedule 6* to include Wyse Road and Robie Street Centres as Pedestrian-Oriented Commercial Streets.

Furthermore, the Pedestrian-oriented commercial street requirements, under LUB *Section 41*, allow only ground floor commercial uses. This by-law will help to create walkable commercial streets, but fails to incorporate ground floor residential units with the recognition that not every successful pedestrian-oriented commercial street needs to be exclusively commercial. Additionally, this risks exacerbating the oversupply of vacant office and commercial space on the Peninsula.

**Recommendation 25:** Amend LUB *Section 41* to allow ground floor residential units in a percentage of each new development on Pedestrian-Oriented Commercial Streets.

While Complete Communities are one of the four Visions and Principles of the Centre Plan, the intention of the municipality to play a role in creating Complete Communities in the Centres and Corridors and surrounding the Higher Order Residential Zones is missing entirely from the SMPS. Streetscaping projects, similar to that completed on Argyle Street and that slated for Spring Garden Road, are missing from the Centre Plan. An intention to couple streetscaping with development incentives and concentrated growth in the new zones is crucial to fashioning Complete Communities for the new and existing residents. Likewise, intentions, goals, and objectives for future Municipal investment (allocating existing assets and future required assets, such as buildings for community centres, lots for parks, etc. is not identified through the Centre Plan. This leaves the introduction of any new community assets in neighbourhoods experiencing growth entirely up to private development. If the intention is to create Complete Communities across the Centre Plan area, then this omission is unacceptable.

**Recommendation 26:** Centre Plan should include recommendations for locating future streetscaping projects and timelines for their introduction.

**Recommendation 27:** Include a list of existing Municipal assets, future plans (if any) for each, and how existing or future assets might be used to contribute to a Complete Community in each of the Centre zones and Corridor zones.

## Appendix A: List of Recommendations (included inline above)

**Recommendation 1:** Each of the Centres and Corridors needs more specific Policies with regards to LINK or PLACE designation. This specificity will help to qualify each Centre or Corridor's deficiencies and/or advantages. Where this is covered by the IMP, explicit reference should be made so that the reader can draw connections between the Centre Plan and the IMP. These policies could also include future plans for streetscaping projects and reference to what elements are important in maintaining the current transportation functions of differing Centres and Corridors.

**Recommendation 2:** Update *Policy 99* to include a "shall consider" clause, instead of "may consider". Furthermore, clarify what is meant by "Transit Priority Plan" in *Policy 99*.

**Recommendation 3:** Explore introducing protections for parcel fabric of specific Centres and Corridors that have historic, social, and economic value in their neighbourhoods. If this is infeasible, certain key locations should be removed from Centre and Corridor zones.

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**Recommendation 4:** Explore the introduction of incentive related to adaptive reuse and renovation within historically residential neighbourhoods that will be designated CORR-2 or CORR-1 zones.

**Recommendation 5:** Amend Centre and Corridor policies to include greater details specific to each Centre and Corridor, which will help developers and decision-makers alike to enhance the character, heritage, and amenities in each area.

**Recommendation 6:** Identify internal municipal intentions for current and future projects with the use of existing municipal assets. This should include proposed future parks to accommodate new residents, streetscaping projects, community centres, etc. Connections should be drawn between this and the Urban Forest Master Plan, to ensure that development and naturalization happen cohesively.

**Recommendation 7:** In the Design Manual, context should be explicitly stated for each Centre and Corridor recognizing the uniqueness of their built form in order to provide guidelines that will help the design review team to determine whether a proposal is contextual for the street/neighbourhood.

**Recommendation 8:** Introduce sufficient differentiation through policy in terms of existing character and fabric of each Centre and Corridor that will help future decision-makers to deal with non-conforming proposals. This should recognize that some non-conforming proposals might help to contribute to Complete Community development.

**Recommendation 9:** Amend Section 152 of LUB to remove requirement of parking on four or less unit dwellings.

**Recommendation 10:** Amend LUB Section 106.1(c) to introduce more appropriate lot coverages depending on individual situations for HR-2 and HR-1 zones. In order to accommodate sufficient density on these larger sites, maximum lot coverage should not be below 80%.

**Recommendation 11:** Create and release a reference sheet that links Policies in the SMPS with the By-laws and Design Manual that enforce these Policies.

**Recommendation 12:** Conduct online surveys and forums to allow residents from individual neighbourhoods to rank their amenity needs and provide this information to developers upon their notification to the Municipality of intent to make a development proposal.

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**Recommendation 28:** requirements for development that gives back, and

## Appendix B: Specific Errors, Inconsistencies, and Concerns Needing Review

## Appendix C: Mock-up of Community Vision Statement for Gottingen Street

This Centre includes Gottingen Street from Cogswell Street to Buddy Daye Street, as well as larger parcels of land northwest of the Cogswell Interchange. Historically, the commercial and entertainment heart of Halifax's North End, Gottingen Street is an important site for African Nova Scotian heritage as it was historically the African Nova Scotian business community that initiated the neighbourhood's commercial growth. It also hosts a number of affordable commercial/office units and storefronts and houses a number of non-profit organizations which are crucial to the wellbeing of the existing community.

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Gottingen Street is flanked by a grid of diverse and rapidly changing residential neighbourhoods that contain registered heritage properties, as well as properties with heritage value. There is a mixture of small and large lots that collectively contribute to the fine-grain block structure of the neighbourhood. Historic buildings, which, collectively as a neighbourhood network, characterize Halifax's North End, are not currently protected but are important to the culture and heritage of the street and contribute significantly to the pedestrian realm and the complete community. Gottingen Street is an important pedestrian-oriented commercial street and has been identified through the Integrated Mobility Plan as an existing complete, multi-modal community. Any increases to existing vehicular and transit traffic should be discouraged, as these would threaten the unique balance that has been struck.

Gottingen Street benefits from culturally diverse public art on public and private lots and has wide sidewalks that are ideal for streetscaping projects in the coming years. It is well served by transit and is a short walk from Downtown Halifax and the future redevelopment of the Cogswell Interchange. A significant portion of existing affordable housing in the North End is concentrated on Gottingen Street and in the neighbourhood. It is crucial for this Centre, and for HR-2 and CORR-2 zones in this neighbourhood, that a 1-for-1 policy be introduced with respect to affordable housing to ensure that this stock is not lost as redevelopment and infill occurs.

Gottingen Street is a relatively narrow street where development standards need to consider solar access, protection from wind and landscaping treatments for the public realm to ensure a comfortable pedestrian environment. Prominent sites at intersections provide opportunities to create urban design interest. New development will respect the historic character of the area and contribute towards a variety of housing types. Building materials used should complement existing natural wood shingle finishes, brick siding, earth tones on larger buildings, colourful row housing on smaller buildings, and other contextual design. Good examples of existing (recent) infill projects include 2157 Gottingen Street (Commercial/Residential), 2169 Gottingen Street, 2300 Gottingen Street (brownfield remediation infill), and (if lot previously consolidated) 2128 Gottingen Street.

## Appendix U

### Halifax is more equal than most cities, but has hotspots of income disparity.

A new report issued by the Neighbourhood Change Research Partnership, the Perceptions of Change Project, and United Way Halifax shows that although Halifax appears to have greater income equality than other major Canadian cities, it has ‘hotspots’ of low-income and inequality throughout the municipality.

Analysis of income inequality trends using Census and tax data from 1980 to 2015 across eight major Canadian cities shows that Halifax consistently had lower levels of income inequality among its neighbourhoods. It also had the least amount of income polarization. Nevertheless, it has had a shrinking middle class, with 8% fewer middle-income neighbourhoods in 2015 compared to 1980.

Between 1980 and 2015 a number of hotspots of inequality emerged throughout the municipality. Dartmouth North and aging suburban developments in Dartmouth have transitioned from middle to lower-income areas. This pattern also reflected in older parts of Clayton Park along the Bedford Highway, census tracts around Saint Mary’s University, and parts of the municipality’s ‘rural east.’ Other downward trending areas are located are found in Fairview, Spryfield, and the area around the Woodside Ferry Terminal.

Many of these areas are beside neighbourhoods with income trending upward or are beside middle or higher income areas. Howard Ramos, a political sociologist at Dalhousie University, notes that, “On the surface, Halifax looks like it doesn’t suffer from income inequality compared to other Canadian cities, however, the city has a number of polarized adjacencies and people across the municipality are concerned about affordability”.

The ‘hotspots’ of income inequality shown in the report align with neighbourhoods that United Way Halifax has identified as areas of focus. “Bringing a neighbourhood focus is an important part of United Way Halifax’s work on poverty solutions,” says Sue LaPierre, Director Community Impact. “We know the experience of poverty in Halifax varies when we consider urban, suburban and rural perspectives. Through our consultations, we’ve learned where people live and their level of income helps us understand only one aspect of poverty’s impact – it is also important to consider factors like the quality of transportation, food, housing, and access to services, such as health and education,” adds LaPierre.

When five lower income neighbourhoods were examined in detail it became clear that they are linked to families with children, higher rates of unemployment, lower levels of education, higher rates of renting, and a greater share of income spent on shelter. For these reasons the report concludes that the city and province need to prioritize affordable housing with units that can accommodate families.

This research is funded by the Social Sciences and Humanities Research Council of Canada. Please contact Dr. Howard Ramos at [howard.ramos@dal.ca](mailto:howard.ramos@dal.ca) for media inquiries or see the full report at <http://perceptionsofchange.ca/hotspotsofinequality.html>.

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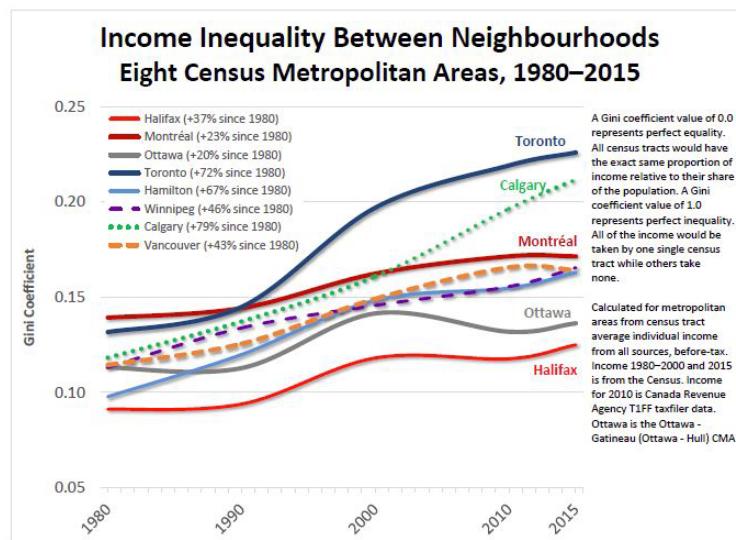


# Halifax: A City of ‘Hotspots’ of Income Inequality

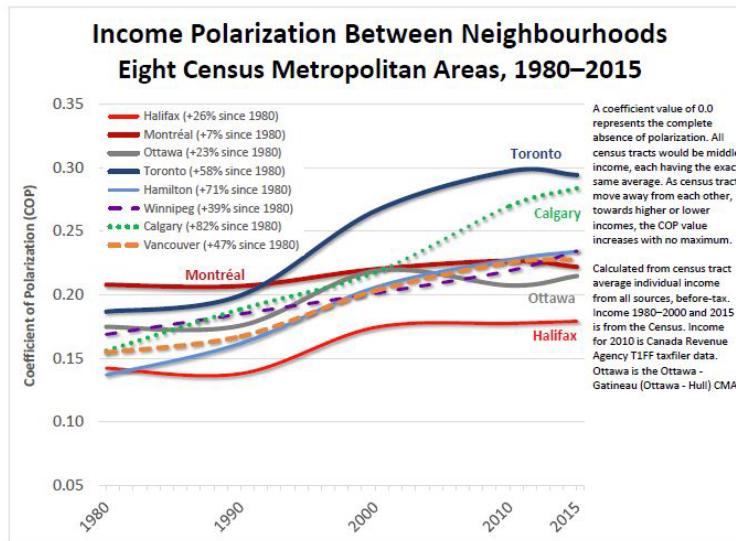
The discrepancy between low-income and high-income neighbourhoods is increasing in cities across the world.<sup>1</sup> At the same time, income polarization and the socio-spatial segregation of inequality has been increasing since at least the 1990s.<sup>2</sup> In Canada, the impact of overheated housing markets in Toronto and Vancouver have dominated debates on socio-economic inequality and affordability;<sup>3</sup> and the country's largest cities show evidence of income gaps across neighbourhoods and clustering of lower income neighbourhoods.<sup>4</sup> Far less is known about the country's secondary cities, including those in Atlantic Canada. For these reasons, this report examines socio-spatial patterns of income in the Halifax Regional Municipality (HRM) between 1980 and 2015 to identify the municipality's lower-income neighbourhoods. It does so by looking at census tracts across the municipality as a whole to identify income trends and map patterns. It also uses census data on a group of lower-income areas identified in the analysis to better understand the demographics of these areas and to identify policy interventions to alleviate inequity across the municipality. A socio-spatial examination of income in the HRM as a whole is important because discussions of the city are often centered on patterns in the Peninsula or other specific parts of cities rather than looking at the full range of communities that are part of the municipality. The HRM covers almost 5,500 km<sup>2</sup> and contains a variety of urban, suburban, and rural communities,<sup>5</sup> which all warrant inclusion in the understanding of income inequality in the municipality.

## Income inequality across Canadian cities is growing

Studies of cities around the world show rising rates of income inequality. Canada is part of this trend. Income inequality has increased among neighbourhoods between 1980 and 2015 in eight of the country's major cities. This can be seen through an analysis of Gini coefficients for each city, calculated by accounting for the percentage of the total income in the municipality that is held by each neighbourhood while factoring in a neighbourhood's relative population size. A coefficient of 0 represents perfect equality and 1 represents complete inequality. Toronto consistently had the most inequality since the 1990s and Calgary had the greatest increase in its Gini coefficient between 1980 and 2015. By contrast, Ottawa had the lowest increase in inequality among its neighbourhoods, with a 20% increase in its Gini coefficient. During the 1980–2015 period, Halifax consistently had lower levels of income inequality among its neighbourhoods compared to other Canadian cities. Here, and throughout the report, we use Halifax interchangeably with HRM. In figures the shorter name of the municipality allows for easier interpretation and comparison across other cities.

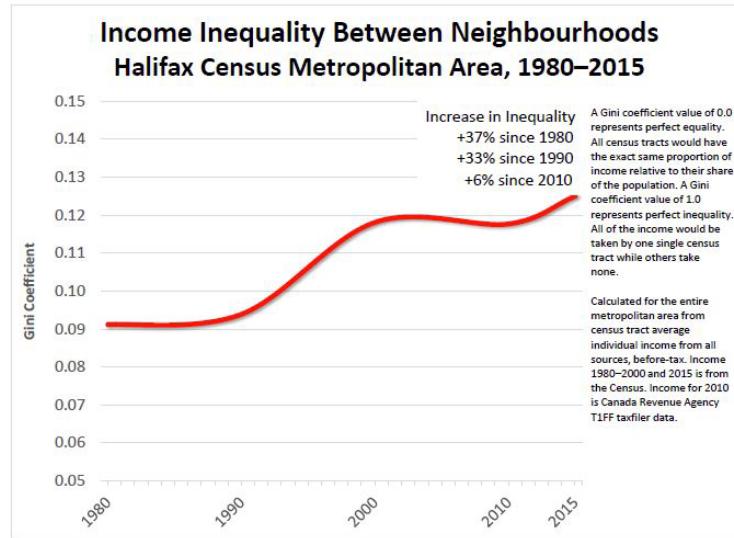


Income inequality is a gauge of how evenly income is distributed among neighbourhoods; however, it does not capture the degree to which people are geographically grouped by high income or low income. For this reason, we also examine income polarization through a coefficient of polarization (COP), which measures the distribution of average incomes among census tracts to see whether these averages are clustered into low-income and high-income groups.<sup>6</sup> When we examine the spread and grouping of census tract average incomes, we see that Calgary had the greatest increase in income polarization across neighbourhoods, with an 82% increase of its COP between 1980 and 2015. Toronto, however, had the most polarization for from the 1990s onward. The lowest increase in polarization was seen in Montreal, with an increase of 7%. Halifax consistently had the least amount of polarization across neighbourhoods.

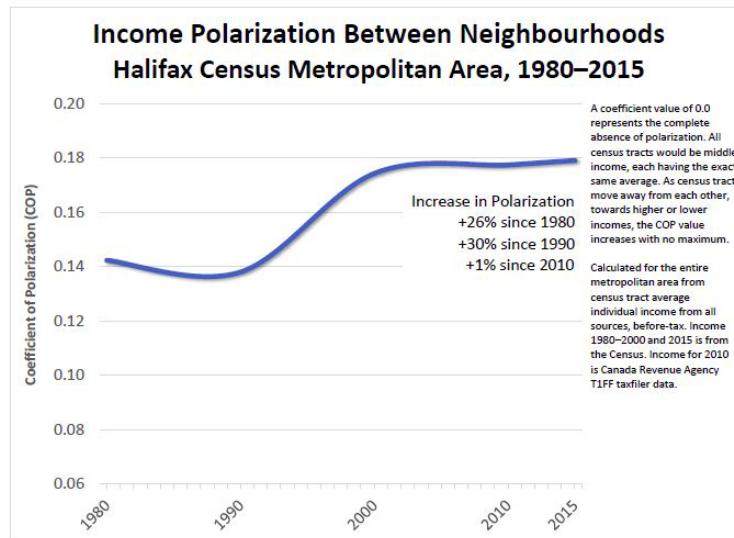


## Income inequality and income polarization in Halifax increased

When we look at the HRM specifically, we see that both income inequality and polarization increased substantially during the 1990s. This was a period of economic downturn in the Atlantic region, and the HRM was not spared. Military bases closed, government jobs were lost, the federal government reduced federal transfer payments to the province, and the unemployment rate was high.<sup>7</sup> Between 1980 and 2015, income inequality increased by 37%. Yet the most substantial increases occurred during the 1990s, with a 33% increase in income inequality from then until 2015. From 2010 onward, the increase has been 6%.

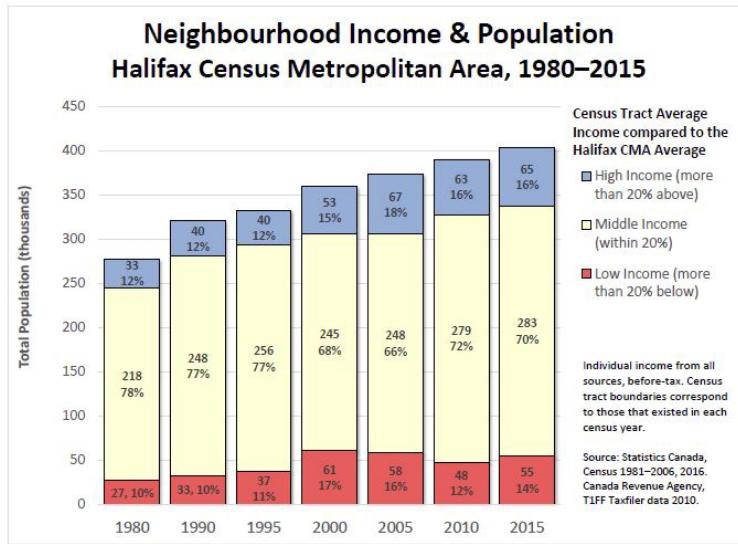


A similar pattern is seen with income polarization. Overall, from 1980 to 2015, the HRM saw a 26% increase in the coefficient of polarization. From the 1990 to 2015, the increase was 30%. There was relatively little change in polarization in the following decades, with just a 1% increase since 2010. Trends corresponds with regional economic strife during the 1990s.



While increasing income polarization is typically associated with a shrinking middle class, it can also occur when the average incomes of low-income neighbourhoods approach the average income of other low-income neighbourhoods, and vice versa. This results in an inter-neighbourhood income distribution characterized by a group of low-income and high-income neighbourhoods. To explore this, we look at the proportion of neighbourhoods that have different levels of income.

We define high-income neighbourhoods as those that have average incomes that are 20% higher than the municipality's average. Middle-income neighbourhoods are those within 20% of the municipality's average, and low-income neighbourhoods are specified as those that are more than 20% below the municipality's average.



Overall, we see modest change in the proportions of different income neighbourhoods over time. The most substantial change occurred during the 2000s, when the proportion of middle-income neighbourhoods decreased and the percentage of low-income neighbourhoods increased.

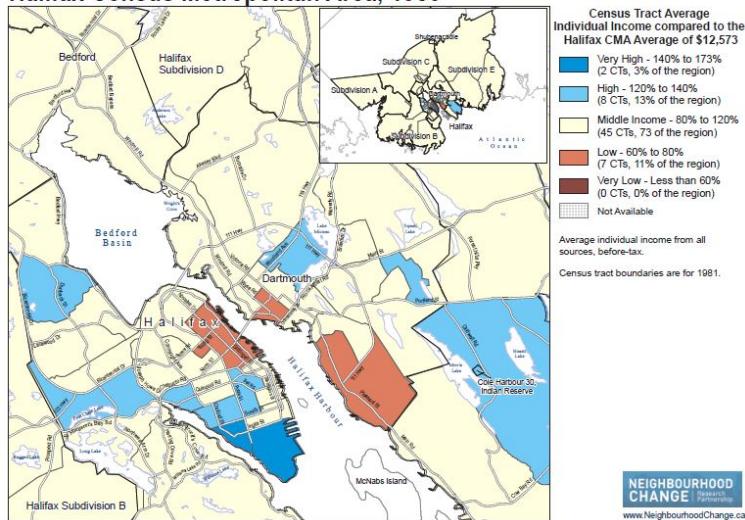
During the 1980s, 78% of the municipality's neighbourhoods were middle-income. At the time, 12% were high-income and 10% were low-income. A decade later, there was little change. However, by 2005 the percentage of middle-income neighbourhoods shrank to 66%. During the period, the percentage of high-income neighbourhoods increased to 18% and the low-income neighbourhoods increased to 16%. By 2010 and 2015, we see a slight increase of middle-income neighbourhoods and a decrease of high and low-income neighbourhoods but not a return to the situation in the 1980s. Taken together, these changes suggest that increased polarization in the HRM may be due to a shrinking middle class.

A recent survey of perceptions of neighbourhood change in the HRM adds to these trends by showing that the majority of residents are concerned with affordability. Only 14% of participants in the survey felt their neighbourhood became more affordable over the last five to ten years.<sup>8</sup>

## Where are Halifax's lower-income neighbourhoods?

The percentage of neighbourhoods that fall into different income brackets helps identify income inequality and polarization at the municipal level but does not show how it affects people on the ground. It also does not speak to whether socio-spatial clustering of neighbourhoods exacerbates income inequality and polarization. To understand this, we map incomes in the HRM for 1980 and 2015 and then map changes between those two periods.

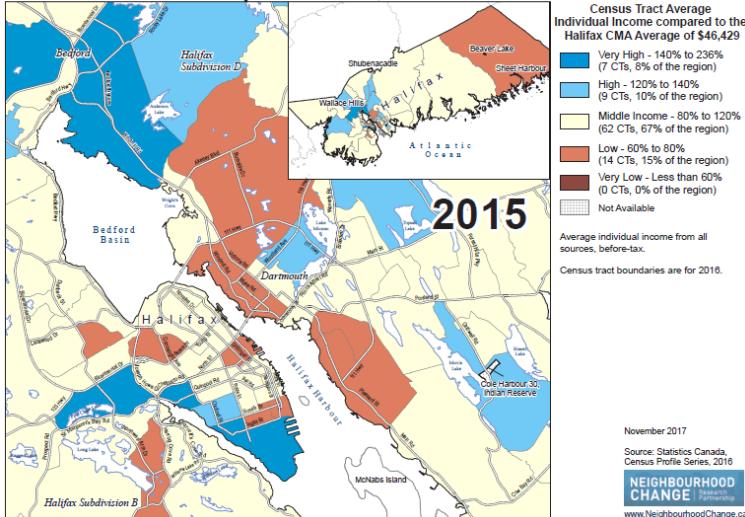
## Average Individual Income Halifax Census Metropolitan Area, 1980



Analysis of income maps of the municipality shows that income inequality follows no strict pattern or set of clustering. Rather, lower- and higher-income groups are scattered throughout the municipality in ‘hotspots.’ In 1980, for instance, seven census tracts had low incomes, where the average individual income was 60% to 80% of the municipality’s average. They included the north end of the Halifax peninsula, downtown Dartmouth, and the area around the Woodside Ferry Terminal. They were surrounded by middle-income and high-income census tracts.

High-income neighbourhoods, those which had 120% to 140% of the municipal average, were even more dispersed. Some fell in Clayton Park, others were in Crichton Park in Dartmouth, Ellenvale (located between Portland Street and Main Street in Dartmouth), and Cole Harbour. There were also wealthier census tracts in the South End of Halifax’s peninsula, along the Northwest Arm and where the peninsula connects with the mainland at the Armdale Rotary. The only two neighbourhoods that had 140% of the municipality’s average income or higher were in Halifax’s South End.

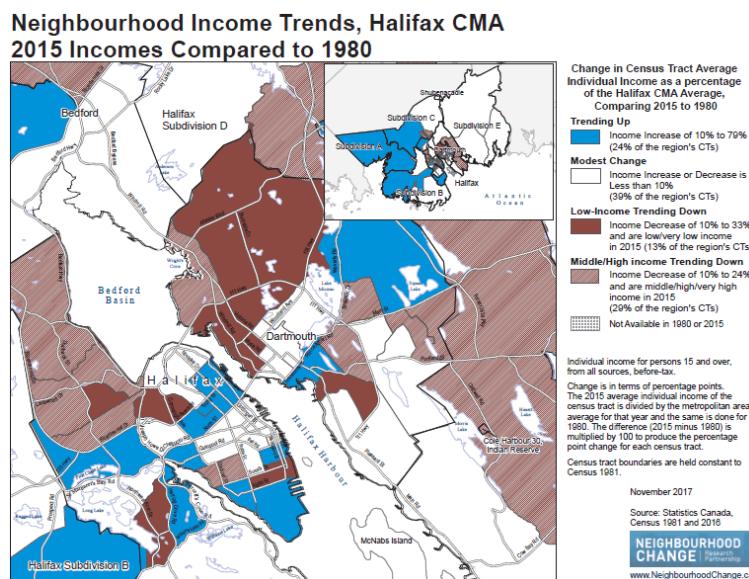
## Average Individual Income Halifax Census Metropolitan Area, 2015



By 2015, neighbourhoods in different income brackets were even more scattered across the municipality, again showing hotspots of high and low incomes. The area around the Woodside Ferry Terminal on the Dartmouth side of the harbour, North Dartmouth, the rural eastern part of the municipality, Spryfield, and parts of Clayton Park, and Halifax's peninsula and downtown Dartmouth were low-income census tracts.

High-income census tracts in 2015 were found in Cole Harbour, Crichton Park, and parts of the South End. Since 1980, high-income census tracts have appeared on the north side of the Bedford Basin, the Port Wallace neighbourhood of Dartmouth, and in more rural areas of the municipality towards Shubenacadie, Middle Sackville, and Upper Tantallon. The very high-income census tracts are in Bedford and Fall River, Halifax's South End, and the mainland just past the Armdale Rotary. When we compare the 2015 map to the 1980 map, we see that much of Dartmouth North, suburban Dartmouth and Spryfield has transitioned from middle-income to low-income areas.

To explore patterns further, we also map income trends over time to show which census tracts are trending up, and which ones are trending down. Some clearer patterns emerge from this analysis. The municipality has hotspots of lower income rather than consistent bands of high- and low-income as seen in some larger centres like Toronto.



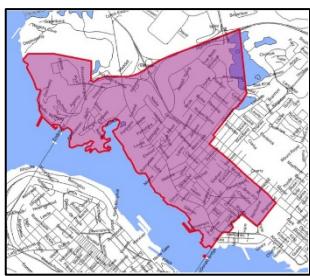
Mapping income trends over time shows that most neighbourhoods that are trending up, those experiencing increases in their average income between 1980 and 2015, are found in Halifax's peninsula and in the western part of the municipality. Specifically, the upward-trending census tracts are located in downtown Dartmouth, suburban Dartmouth, the North End and the South End as well as new off-peninsula developments in the western part of the Census Metropolitan Area such as Tantallon along Highway 103.

By contrast, many of the downward trending neighbourhoods, those experiencing decreases in their average income between 1980 and 2015, are found in Dartmouth North and in Dartmouth's aging suburban developments which have transitioned from middle to lower-income areas. This pattern is also reflected in older parts of Clayton Park along the Bedford Highway, census tracts around Saint Mary's University, Spryfield, Fairview, and the Preston area. The area surrounding the Woodside Ferry

Terminal has experienced low income since 1980 and is trending downwards. Although popular discourse and attention focus on the precariousness of the North End of the Halifax peninsula,<sup>9</sup> some census tracts in that area trended upward during the period examined. At the same time, others had modest change, showing some evidence of gentrification.<sup>10</sup> The presence of hotspots of lower-income areas close to or beside higher-income areas shows that the municipality has ‘polarized adjacencies’ — or areas of stark contrast where low-income and high-income neighbourhoods are in close proximity.<sup>11</sup> Taken together, the maps presented in this report pinpoint several lower-income areas across the municipality that merit further analysis.

## Probing into some of Halifax’s lower-income areas

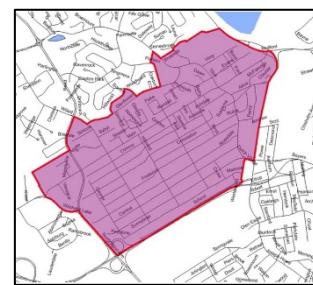
The analysis of maps of income inequality show a number of lower-income areas throughout the HRM. For instance, Dartmouth North, Spryfield, Fairview, and HRM’s ‘rural east’ are in low-income census tracts in 2015. The three of the neighbourhoods are also currently trending downwards in terms of income. United Way Halifax has selected these neighbourhoods as well as the Preston area, which is also trending downward in terms of income, as places to focus its work. In the rest of the report we explore demographic features of these ‘neighbourhoods of focus’ to better understand what might be driving lower income trends.



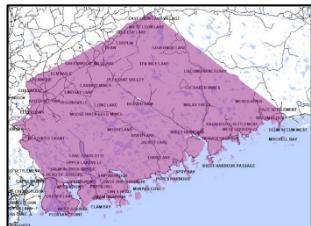
Dartmouth North



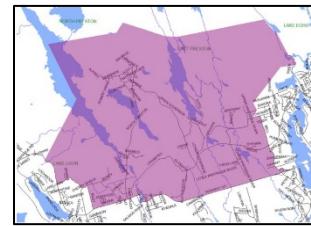
Spryfield



Fairview



‘Rural east’



Preston area

When we examine average household income across these areas, we see that in Dartmouth North it is 47% lower than the municipality’s. This is the biggest difference from the municipality’s average household income among the neighbourhoods we are probing. The ‘rural east’ of the municipality has the smallest difference at 24% lower than the municipality’s average. It should be noted that the ‘rural east’ is sparsely populated, relative to the urban core of the municipality and that its many small communities likely experience the area’s lower income unevenly. When average income is examined by family types we see that there is lower income across all family types and neighbourhoods of focus. In Dartmouth North and Fairview, couple families with children had noticeably lower incomes compared to other family types; however, this was not as clear in the other neighbourhoods we examined.

Table 1: Average income by family type in select neighbourhoods

	HRM	Dartmouth North		Fairview		Spryfield		Preston area		HRM Rural East	
	Average income	Average income	Difference from HRM	Average income	Difference from HRM	Average income	Difference from HRM	Average income	Difference from HRM	Average income	Difference from HRM
Couple Families with Children	\$ 132,993	\$ 69,487	-48%	\$ 74,898	-44%	\$ 96,138	-28%	\$ 97,499	-27%	\$ 98,755	-26%
Couple Families without Children	\$ 98,899	\$ 61,316	-38%	\$ 70,249	-29%	\$ 72,570	-27%	\$ 72,408	-27%	\$ 71,445	-28%
Lone Parent Families	\$ 61,771	\$ 40,323	-35%	\$ 38,372	-38%	\$ 47,029	-24%	\$ 58,571	-5%	\$ 51,907	-16%
Persons Living Alone	\$ 44,657	\$ 30,118	-33%	\$ 34,652	-22%	\$ 31,727	-29%	\$ 29,909	-33%	\$ 34,589	-23%
Average Household Income	\$ 86,753	\$ 45,890	-47%	\$ 54,809	-37%	\$ 57,611	-34%	\$ 63,384	-27%	\$ 66,346	-24%

<sup>a</sup>Annual average household income before tax<sup>b</sup>Data compiled by DvPilkey Consulting<sup>c</sup>Statistics Canada (2016 Census) (Catalogue no. 98-401-X2016043 & 98-401-X2016044)

We next examined the relationship between age and lower income in the same neighbourhoods. Dartmouth North has the highest percentage of low-income residents among neighbourhoods, with 34% of residents reporting low income. The low-income rate in Dartmouth North is 19% more than the municipality as a whole. The HRM ‘rural east’ has the lowest percentage of low-income residents among neighbourhoods in our analysis. When we examine age and low-income, we find a much higher percentage of minors in Dartmouth North, Fairview, and Spryfield experience low-income compared to the municipal average. Age and low income appear to have a different relationship in the urban-fringe and rural neighbourhoods, as seen in the Preston area and ‘rural east.’ These neighbourhoods have a lower overall percentage of low-income residents and this appears to be related to a smaller percentage of low-income minors. Taken together with the findings on couples with children, it appears that there is a relationship between having children and being low income in these neighbourhoods.

Table 2: Low-income rate by age group in select neighbourhoods

	HRM	Dartmouth North		Fairview		Spryfield		Preston area		HRM Rural East	
	Percent of age group	Percent of age group	Difference from HRM	Percent of age group	Difference from HRM	Percent of age group	Difference from HRM	Percent of age group	Difference from HRM	Percent of age group	Difference from HRM
0 to 17 years	19%	49%	30%	49%	30%	40%	21%	27%	8%	24%	5%
18 to 64 years	14%	32%	17%	28%	14%	26%	12%	20%	5%	16%	2%
65 years and over	12%	27%	15%	21%	9%	25%	13%	25%	14%	23%	11%
Total with Low Income (after tax)	15%	34%	19%	30%	16%	29%	14%	22%	7%	19%	4%

<sup>a</sup>Low income measure after-<sup>b</sup>Data compiled by DvPilkey Consulting<sup>c</sup>Statistics Canada (2016 Census) (Catalogue no. 98-401-X2016043 & 98-401-X2016044)

We analyzed trends further by looking at four additional demographic factors: immigration status, visible minority and Indigenous identity, and education. When racialized and Indigenous identity are examined, we find that the Preston area has 47% more visible minority residents compared to the municipality overall. This area is historically African Nova Scotian. It also has a higher percentage of Indigenous residents, with 15% identifying as such compared to the municipality at 4%. In all other neighbourhoods, save the ‘rural east’, there was a higher percentage of visible minority residents than for the municipality. With respect to Indigenous identity, differences in other neighbourhoods compared to the municipality as a whole were marginal. The areas of focus also have a higher percentage of residents with high school or less education and they have a lower percentage of residents with university credentials than the municipality. For instance, 31% of residents in the Preston area have less than high school and another 28% only high school education. This is compared to 15% and 25% in the

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municipality, respectively. Likewise, 7% of Preston area residents have a university certificate, diploma or degree, compared to 31% for the municipality as a whole. The same pattern is seen across the other neighbourhoods of focus.

Table 3: Demographic variation across select neighbourhoods

	HRM	Dartmouth North		Fairview		Spryfield		Preston area		HRM Rural East	
	Percent of population	Percent of population	Difference from HRM	Percent of population	Difference from HRM	Percent of population	Difference from HRM	Percent of population	Difference from HRM	Percent of population	Difference from HRM
	Immigrant Visible minority Aboriginal identity Education	9% 11% 4% Less than High School High School Certificate Non-university diploma University accreditation	8% 15% 6% 22% 32% 32% 14%	-2% 4% 2% 8% 7% 3% -18%	18% 23% 4% 19% 27% 28% 26%	8% 12% 0% 4% 2% -1% -5%	9% 14% 5% 25% 27% 29% 20%	0% 2% 1% 10% 2% 0% -12%	1% 58% 15% 31% 28% 34% 7%	-8% 47% 11% 16% 3% 5% -25%	3% 1% 6% 28% 25% 34% 13%

\*Data compiled by DWPikey Consulting

\*Statistics Canada (2016 Census) (Catalogue no. 98-401-X2016043 & 98-401-X2016044)

When we look at the percentage of people who are tenants or renters, we see that Dartmouth North, Fairview, and Spryfield all have a high percentage of renters compared to the municipality's average – ranging from 14% more in Spryfield to 42% more in Dartmouth North. The Preston area and HRM 'rural east' both have low percentages of renters, at 24% and 26% below the municipal average, respectively. A greater proportion of tenants in those areas live in subsidized units, with 22% more residents in the Preston area and 10% more residents in the 'rural east' receiving subsidy compared to the municipal average.

Table 4: Housing and employment variation across select neighbourhoods

	HRM	Dartmouth North		Fairview		Spryfield		Preston area		HRM Rural East	
	Percent of population	Percent of population	Difference from HRM								
Housing											
Owners	60%	18%	-42%	31%	-29%	46%	-14%	85%	24%	87%	26%
30%+ on shelter costs	13%	12%	-1%	17%	4%	15%	2%	20%	8%	13%	0%
Tenants	40%	82%	42%	69%	29%	54%	14%	15%	-24%	13%	-26%
30%+ on shelter costs	43%	46%	2%	44%	0%	45%	2%	16%	-28%	37%	-7%
In a Subsidized Unit	8%	7%	-1%	6%	-2%	11%	3%	30%	22%	18%	10%
Shelter cost index	20%	25%	5%	25%	5%	23%	3%	19%	-1%	16%	-4%
Employment Status											
Employed	62%	59%	-3%	60%	-2%	57%	-5%	49%	-13%	47%	-15%
Unemployed	5%	7%	2%	5%	0%	6%	1%	8%	3%	6%	1%
Not in the Labour Force	33%	34%	1%	35%	2%	37%	4%	43%	10%	47%	14%
Occupations											
Sales, service	25%	37%	12%	34%	9%	30%	5%	33%	8%	19%	-6%
Management	11%	6%	-5%	8%	-3%	9%	-2%	4%	-7%	8%	-3%
Primary industry	1%	1%	0%	1%	-1%	1%	0%	2%	1%	9%	8%
Trades, transport, equipment	12%	17%	5%	12%	1%	16%	4%	19%	8%	23%	12%

\*Household income, after tax

\*Data compiled by DWPikey Consulting

\*Statistics Canada (2016 Census) (Catalogue no. 98-401-X2016043 & 98-401-X2016044)

The impact of such difference is seen when expenditure on shelter cost is assessed. Twenty-eight percent and 7% fewer renters in the Preston area and HRM 'rural east' spend more than 30% of their income on rent, compared to the municipality's average and the urban neighbourhoods examined in this report. This pattern of differences between urban and rural areas is also seen in the shelter cost

index. Residents of Dartmouth North, Fairview, and Spryfield spend a greater percentage of their household after-tax income on shelter costs compared to the municipal average, and the opposite is true in the Preston area and the ‘rural east.’

Employment is lower in all five areas of focus, compared to the municipality as a whole, as is participation in the labour force. The HRM ‘rural east’ has 15% fewer residents employed compared to the municipality overall. All other areas examined show a similar pattern. A higher percentage of residents in all of the focus neighbourhoods, except the ‘rural east,’ are employed in the service industry, ranging from 5% more in Spryfield to 12% more in Dartmouth North. Each of the neighbourhoods have a greater percentage of people working in trades, transportation, or as equipment operators, particularly in the Preston area, where this figure is 8% higher, and the ‘rural east,’ where it is 12% higher. The ‘rural east’ also has 8% more residents working in primary industries. Fewer residents in the focus neighbourhoods work in management positions, ranging from 2% fewer in Spryfield to 7% fewer in the Preston area.

## **Income inequality, income polarization, and Halifax’s lower-income areas**

Although income trends show less inequality and polarization in the HRM than other major Canadian cities, both have increased between 1980 and 2015, and the municipality has several low-income neighbourhoods.

When we look at the municipality as a whole, we see that inequality and polarization increased rapidly during the 1990s. This corresponds to an economic downturn and the loss of many high-paying and normally stable jobs in the region. This was followed in the 2000s with a hollowing-out of middle-income earners. The impact of the changes seems to have created ‘hotspots’ of lower-income neighbourhoods across the municipality.

Groups of low-income earners are dispersed across the municipality rather than concentrated in a consistent socio-spatial pattern. This makes Halifax different than cities like Toronto, where lower-income areas are concentrated in rings of inner and outer suburbs with wealthier and higher income in the downtown core. Instead, Halifax’s lower-income areas are dispersed throughout the municipality in places like the area around the Woodside Ferry Terminal, North Dartmouth, the ‘rural east’ of the municipality, Fairview, Spryfield, and parts of downtown Dartmouth and Halifax.

Analysis of demographic patterns in the North Dartmouth, Fairview, Spryfield, Preston, and ‘rural east’ areas showed that low income is linked to families with children, those who are renting, being a visible minority, lower rates of post-secondary education, higher rates of unemployment, and employment in lower-paying sectors. In North Dartmouth, Fairview, and Spryfield people also spend a greater proportion of their income on shelter.

Taken together, these finding offer seven key areas for policy intervention, including:

- Income inequality and polarization appear lower in the HRM, but the municipality has hotspots of lower income.
- Focusing on neighbourhood specific programs rather than ones for the municipality as a whole is likely to have greater impact.
- Income dynamics are different in the rural versus urban areas of the municipality.

- Low-income neighbourhoods are linked to families with children. For this reason, programs that offer child and family support are likely to have great impact on alleviating inequality in the city.
- Low-income neighbourhoods have higher rates of unemployment. Considering the link to family and children, programs that support child care may improve employment in low-income neighbourhoods.
- Low-income neighbourhoods are tied to lower levels of education. Programs for skill upgrading and opportunities to complete high school and pursue post-secondary education in such areas could alleviate precarious employment and unemployment in the municipality's lower-income areas.
- Low-income neighbourhoods are tied to higher rates of renting and a greater share of income spent on shelter costs. A focus on affordable housing with units that can accommodate families and children should be a priority.

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### Note on data sources and methods of analysis

All maps and charts tracking changes in income inequality and polarization and the percentage of low-income, middle-income, and high-income census tracts were produced by Richard Maaranen, data analyst for the Neighbourhood Change Research Partnership (NCRP): <http://neighbourhoodchange.ca/> The partnership is led by David Hulchanski, Principal Investigator. All income data come from the Canadian Census of Population and tax records.

Dennis Pilkey of DW Pilkey Consulting compiled data from the 2016 Census to compare the demographic composition of the entire Halifax Regional Municipality and five neighbourhoods we identify as areas of concern. This analysis was conducted for the United Way of Halifax. Some data were collapsed by Kathleen MacNabb, a researcher at Dalhousie University.

Information on Haligonians' perception of changing affordability in their neighbourhoods is based on a telephone survey of 462 residents in the spring of 2017 by researchers on the Perceptions of Change in Atlantic Canada research project, based at Dalhousie University:

<http://perceptionsofchange.ca/neighbourhoodchange.html>

This report was compiled and written by Dr. Howard Ramos and Kathleen MacNabb at Dalhousie University. The report was reviewed by an advisory committee consisting of: Dr. Jill Grant (Professor Emerita, School of Planning, Dalhousie University), Dr. Paula Hutchinson (Evaluation and Reporting Specialist, United Way Halifax), Dennis Pilkey (Senior Consultant, PW Pilkey Consulting), Dr. Martha Radice (Associate Professor, Department of Sociology and Social Anthropology, Dalhousie University), and Jennifer Wilcox (Consultation & Learning Specialist, United Way Halifax).

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