

Community Design Advisory Committee

Centre Plan – Draft Package “A” February 23rd, 2018

Review of Public Comment on Planning Documents

Note:

This document includes public and stakeholder comments received from all sources over the consultation period (Feb. 23- May 4, 2018), and received up until May 8th, 2018. They have been edited and organized for clarity to reflect key issues and concerns. Site specific requests are not summarized in this document, rather they are contained within the comprehensive correspondence packages (appendices).

Attachments (provided electronically on USBs):

1. Package A – Community Letters and Submissions Feb. 23 – May 8 2018
2. Package A – Residents Letters and Submissions Feb. 23 – May 8 2018
3. Package A – Development Industry Letters and Submissions Feb. 23 – May 8 2018
4. Package A – Elected Officials Letters Feb. 23 – May 8 2018
5. Package A – Letters and Submissions received post May 8

1. Vision & Core Concepts

CDAC Comment

Theme	Sub-Theme	Comment	Response
1.1 Vision & Core Concepts Sources: Letter - COM, Letter - IND, Letter - Public, Workshop - IND, SYC, Social Media, Workshop - COM, Letter - Public	Plan Strength	Recommendation to expand and extrapolate the vision throughout the document to connect policy recommendations to larger planning themes.	Change recommended – staff are working to articulate the connection between the vision and the resultant regulations.
	Pedestrians First	Map the planning walkshed for each community, the high street of those communities, and create a hierarchy of streets. Each of these areas should then have specific street typologies that reveal how the street will be used for pedestrian life. New street typologies that cater to pedestrian activity, such as shared streets and woonerfs, should be introduced into community design and linked to areas where higher density development is anticipated.	More discussion needed <ul style="list-style-type: none"> - Not clear on the purpose of walksheds. - High streets are identified as Pedestrian Oriented Commercial Streets - Staff are not clear on the purpose of street typologies within an MPS or LUB; policy support exists for complete streets but implementation is to follow through a streetscaping program. - MPS could identify priority streets more explicitly
	Regional Centre Scale of Vision	The effect of the regulations should be modelled or visualized at the Regional Centre scale. A potential birds eye view of prospective development to 2031.	Change recommended – Identifying potential future development will be explored through the work to strengthen policy.
	Strategic Growth	<p>There is concern that the growth of HRM will be slower than 1% a year, and that the population will continue to choose suburban living, leaving the question of what impact the Centre Plan will have if less than 40% of the growth of the Region is contained within the Centre Plan area.</p> <p>Alternatively, there is concern that the Region will continue to grow at a pace faster than 1% and the required development to achieve 40% of development in the Regional Centre will not fit within the constructs of the policy and regulations provided in the Draft Planning Documents.</p>	<p>The overall growth of HRM population has been very steady, on average 1% per year. In 2016 and in 2017 HRM as a whole has grown at an annual rate of 2% . HRM will continue to monitor this growth, and will adjust the Centre Plan as required.</p> <p>Over the past five years the trend has been of close to 40% of all housing starts, the majority in the form of multi-unit dwellings.</p>
	Regional Plan	It was noted that Centre Plan Package “A” does not do a great job of responding to the stated aim of Chapter 6 of the Regional Plan.	Change recommended – Although the Centre Plan consultation has identified the need to update the vision and guiding principles first developed in 2008, staff are confident that the proposed Plan and LUB closely align with the direction provided by the Regional Plan and will work to clearly articulate that alignment in updates to the SMPS.

Theme	Sub-Theme	Comment	Response
1.2 Policy Requiring Enhancement Sources: Workshop - IND, Letter - IND, SYC, Social Media, Letter - COM, Workshop - COM, Letter - Public, Workshop - Landscaping	Designation policy	<ul style="list-style-type: none"> • Provide greater specificity in Urban Structure polices respecting designations, to allow for amendments within each designation based on detailed considerations. • Introduce policies that define what character elements a Designation is comprised of. For example for Centres, there are the objectives CE 1-5, but no Policy offering definition, or character elements. Not having these details will make it difficult to defend or refute a zoning amendment application. • Provide more details in policy respecting the rationale for designating certain areas as Higher-Order Residential and not other, and respecting HR-2 versus HR-1. 	Change recommended — Urban structure policies require more specific and detailed language.
	Local context	<p>Define and nurture unique neighbourhood areas patterns. Define Gottingen. Define Agricola. Define Windsor. Define Quinpool. Define what a “Centre” is.</p> <p>Provide more policy details respecting the following: spot zoning, one-sided streets, fragmented corridors, complete communities, and fragmented heights and FARs within one block.</p>	Change recommended — MPS policies will differentiate within and between Centres and Corridors where appropriate.
	Lake Banook Policy	<ul style="list-style-type: none"> • In 2005 Regional Council wanted to adopt a measure to protect Banook lake and an 11m height limit was suggested and adopted. However, there is no empirical basis illustrating that low-rise buildings of 11 m high would not affect the paddling course. To ensure development around Banook Lake is 	More discussion needed — If required, wind studies for developments surrounding Lake Banook will need to be guided by detailed performance standards and would need to be prepared by a qualified professional. In principle, evaluating the wind impacts of

	<p>approved based on evidence-based decision making, policy should require wind tunnel modelling and testing for each proposal. This will allow for empirical assessment of the impact on the paddling course, like pedestrian wind tunnel assessments sometimes required in Downtown Halifax.</p> <ul style="list-style-type: none"> Proposals for development which exceeds the draft 11m height limit should be considered through the DA process when backed-up by a detailed wind study. Current policy (H-16) is example policy that recognizes the potential of for high-intensity development, and puts the onus on the developer to show how a proposed site massing/configuration minimizes negative wind impacts. The proposed 11 m height district is based on untested height thresholds, whereas good design based on detailed wind studies could result in built form that mitigate wind impacts. Remove the height limit around Banook Lake and instead require all development proposals in proximity to the lake to be subject to an extensive detailed wind study. To continue with this 11 m height limit would, for example, restrict the redevelopment of the Braemar Superstore site. 	each development proposal within the Lake Banook Special Area may be a possible solution.
Zoning boundaries	Zoning boundaries should be changed to a depth that is appropriate for development, not limited to the depths of specific properties.	Change not recommended — Centre Plan is not intended to promote the redevelopment of every property in every Centre/Corridor. “Less developable” properties nevertheless benefit from new land use permissions.
	Zoning Boundaries should follow the center line of the streets and not property boundaries.	Change not recommended — The Land Use By-law applies to private lands, not public rights-of-way.
	Corridors should be contiguous and not fragmented. Fragmented Corridors contradict complete communities narrative. Corridors should be assigned to both sides of a street. One-sided corridors Fragmented Corridors do not make sense.	Change not recommended — The current designations reflect the existing commercial nodes and enable their further development.
Density framework	Identify an appropriate rationale and framework for height and density.	Change recommended — Updated policy will define the overall framework for height and density, including key nodes and area of transition.
	Ensure Plan does not unnecessarily downzone sites.	Change recommended — any change to rights is done to achieve the goals of this Plan.
Transition regulations	Respecting Future Growth Nodes, incorporate a general policy statement to buffer residential developments from high traffic areas. Proposal: Reintroducing the language in the Purple Plan: “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).	Change recommended — The policy can be strengthened to address buffers from the 100 series highways.
Designation rationale	Add more specific Policies with regards to LINK or PLACE to differentiate differing Centers and Corridors. 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.	Change recommended — the Plan will make a stronger link the concepts of the IMP, including planned connections.

Theme	Sub-Theme	Comment	Response
1.3 Community Well-being Sources: Letter - IND, Letter - COM, SYC, Workshop - COM	Attracting and retaining families	Dwelling unit mix requirements are not the way to attract families — instead, provide the amenities that families need, such as daycares, pocket parks, and secondary suites.	Change not recommended — Unit mix requirements are an important component of planning policy to ensure long-term supply of diverse housing stock within the housing continuum. Staff does support consideration of other options as noted here in addition to the unit mix requirements.
	Smoke-free places	Ensure 100% of multi-unit residential buildings are smoke-free.	Out of scope. Could be dealt with under a non-land use by-law.
	Accessible buildings	Strengthen the Centre Plan’s support for universal accessibility, particularly in the context of affordable housing.	More discussion needed — Currently regulated by the NS Building Code but there may be an opportunity to strengthen Centre Plan policy support for universal accessibility.
	Traffic patterns	The impacts of the Centre Plan on shifting traffic patterns must be considered. Incorporate policy on the importance of safe active transportation routes to school.	Change recommended — The Centre Plan will strengthen the connection with the Integrated Mobility Plan.. .
	Equity	Reintroduce the equity analysis review requirement from the “Purple Plan”. Moreover, HRM should establish a community consultation process based on principles of access and equity, to ensure that the voices of the vulnerable and marginalized are heard.	More discussion needed — More discussion needed to determine the purpose and scope of equity analysis.
	Food security	Ensure that everybody in the Regional Centre has access to a grocery store as well as spaces for food production/urban agriculture.	Change not recommended — Grocery stores are a permitted use. The municipality can only support and remove barriers but not require the use.

2. Local Context

CDAC Comment

Theme	Sub-Theme	Comment	Response
2.1 Character Areas Sources: SYC, Letter - COM, Letter - IND, Workshop - COM, Workshop - IND, Letter - Public	SMPS Vision	<p>Local character would be lost without more textured vision for local areas in the SMPS.</p> <p>Additionally, a suggestion for a <i>Character Area Plan</i> to possibly be included in the SMPS vision that would identify neighbourhoods and outline a strategy for ensuring that local health facilities, daycares, recreation centers and educational facilities will be provided within a walkable neighbourhood.</p>	<p>More discussion needed — More textured policy language may be required but the Plan does provide a textured approach to heights, densities, setbacks and design guidelines etc. Extensive additional character studies leading to architectural codes and additional area specific standards are not recommended. Options to address a Character Area Plan could include:</p> <ul style="list-style-type: none"> - Clear intent of Designations and Zones - Description of unique characteristics within Centres & Corridors - Identification of what is missing and what needs to be strengthened to achieve desired vision and outcomes
	Neighbourhood Character - Investment	Suggestion that local neighbourhood studies be prioritized with capital plans for projects that could be advanced for addressing public infrastructure needs in each of the areas.	More discussion needed — Staff will work with other departments to determine the best approach for including capital planning detail in the Regional Centre SMPS.
	Higher Order Residential	The application of the Higher Order Residential designation does not reflect the variety of places where this was applied. North Dartmouth and South End Halifax have individual characters that are not the same, zones within HR should be drafted to reflect this.	Change recommended — Staff are exploring the need for an additional HR zone to reflect the diversity of HR lands.
	Corridor / Centre Penetration	Further granularity is required in the Corridors. Not all Corridors are the same and differentiation should be provided.	Change recommended — Staff are evaluating boundaries and variations within the designations.
	Neighbourhood Planning	Local area community groups have created plans for areas in Dartmouth & Halifax. There were requests to have that information included in the SMPS rather than simply being used as “input” to the Centre Plan process.	Change not recommended — The content of the studies may help inform the Centre Plan but it is not recommended to embed those studies in the SMPS.
	Today’s Character or Tomorrow’s Character	The comment was made that the plan both tries to protect the existing state and encourage change at the same time. This may be opening the policy to conflict in the future without a well-defined framework for how these decisions are being made.	Change recommended — The Plan may require additional policy language to help inform future requests for re-zonings as well as process for LUB and Plan amendments over time.
	Character studies	<p>More emphasis is needed on nuance, improving the streetscape, and ensuring that new buildings are good neighbours. The proposed requirements for streetwall height, stepbacks, and setbacks are too broad to be applied across all zones and rights-of-way without considering the character of the street and prevailing lot depths. Think long and hard about where you draw your zone boundaries and how you set your streetwall and overall height limits.</p>	More discussion needed — The current draft tries to balance allowing for development, and preserve the abutting established community.
		You need to find a way to protect the vernacular architecture and unique character of streets like Agricola and Gottingen. They require a mixture of infill, demolition, renewal, and adaptive re-use & preservation, but the Centre Plan doesn’t address this. HCDs may be one tool for discouraging the typical raze-and-rebuild mentality in these areas.	Change recommended — The proposed regulations support creativity, but are being refined based on feedback from residents and land owners in these Corridors and Centres particularly.
		The Centre Plan also fails to consider properties with other unique characteristics such as large size, brownfield contamination, and proximity to industrial uses and/or transportation infrastructure.	Change not recommended — Proposed regulations address large sites, future growth nodes, transition to industrial uses (Package B), and connection with transportation and mobility.

Theme	Sub-Theme	Comment	Response
2.2 Heritage Conservation Districts Sources: SYC, Letter - IND, Letter - Public, Workshop - COM, Letter - COM	Westmount	Proposed Boundaries are not extensive enough, the proposed boundary does not physically coincide with the actual memorial and heritage extent of the neighbourhood, nor does it coincide with what a resident of the area does consider to be "Westmount".	Change not recommended – before any Heritage Conservation District is considered it will require a detailed background study, including delineation of boundaries prior to initiation.
	Implementation	Plan should be developed now to implement all the HCD's at once, to ensure protection of heritage assets will then be secured by policy	Change not recommended — that is not feasible considering the requirements in the Heritage Property Act.
	New HCD's Desired	Maynards Lake, Gorsebrook Park, Falkland Street. Expand the Historic Properties proposed district to the Merrill's block, and potentially to Province House, Dennis Building.	More discussion needed – these will be reviewed with the Heritage Planning team.

Theme	Sub-Theme	Comment	Response
2.3 Heritage & Cultural Resources Letter - COM, Workshop - COM, Letter - Public, Letter - IND, SYC, Workshop - IND, Letter - Public	Built Form	The 11 m height assigned to registered heritage properties should be seen as a tool to prevent the demolition of heritage properties, not as the starting point in the negotiations of a development agreement. There can be heights beyond 11 metres that are still acceptable and these should be allowed to be considered.	Change not recommended — the DA process will determine the appropriate form of additions or alterations that exceed the prescribed height.
		Remove or increase the lot coverage maximum clause on Heritage properties. We feel this is too restrictive for development in an urban context; this is especially true if the intent is to incentivise retention of heritage assets.	Change recommended — to further incentivize redevelopment of Heritage Properties it is possible to reduce the coverage limits. Coverage can be varied under the charter currently.
	Development Agreements	There needs to be a mechanism to negotiate an increase in GFAR through the DA process, if not, it will result in a lack of investment and restoration of existing heritage properties.	Change recommended — the GFAR is not meant to be alterable through Development Agreement. Staff will reevaluate current GFAR assignments on Heritage Properties.
	Protection	Will there be incentives for preservation/maintaining heritage buildings further than just the façade.	Change recommended — Heritage protection is controlled in the Heritage Property Act. Heritage Conservation Districts are the strongest level of protection and the Centre Plan sees them as a valuable tool for maintaining more than facades.
		Remove the Corridor Designation from Robie to maintain the historical homes and not incentivize land owners to sell their lots to developers.	Change not recommended — The corridor designation will remain on Robie and form will be mediated to scale with the local character. The corridor allows a variety of uses.
		Culture and Heritage should clarify what types of future programs will incentivize heritage conservation.	Change recommended — The CHPP will make recommendations on cultural programs. The development of new HCDs is a primary response to protection in the Centre Plan.
Culture	Narrative should be added at the outset of the plan that both illuminates and acknowledges the First Nations, African Nova Scotian and Acadian stories of the HRM.	Change recommended — narrative in the SMPS will be strengthened.	

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2.4 Pedestrian-Oriented Streets Source: Workshop - COM, Letter - COM, Letter - IND, Workshop - IND, Workshop - Landscaping	Additional POS	Why were more pedestrian-oriented commercial streets not identified? Amend Schedule 6 to include Wyse Road and Robie Street Centres as Pedestrian-Oriented Commercial Streets. Prince Albert Road has the capability to become pedestrian-oriented commercial street; commercial uses should be required at grade along the street within the Grahams Corner Corridor.	Change not recommended — Pedestrian-oriented commercial streets were purposely assigned to those portions of Centres or Corridors that are already able to support a strong concentration of active, at-grade uses. Although other areas are designated as CEN or COR with active ground-floor uses in mind, Wyse Road and other streets are not designated as Pedestrian-Oriented Commercial Streets because they are still in transition and may not be able to support extensive retail and ground oriented commercial uses.
	Uses in POS	Amend LUB Section 41 to allow ground floor residential units in a percentage of each new development on Pedestrian-Oriented Commercial Streets. Work-Live Units?	Change not recommended — This approach contradicts the overall approach of ensuring some streets become complete community streets with mandatory commercial uses at-grade.
	Glazing in POS	Ground Floor Requirements (pg 58): It is unclear why at least 60% of the buildings total ground floor frontage along all streetlines shall consist of clear glass glazing. This may be inconsistent with the existing character of the street, and the character of the street should be used as the guiding determinant.	Change recommended - Staff will be proposing changes to this requirement.

3. Strategic Growth

CDAC Comment

Theme	Sub-Theme	Comment	Response
3.1 Existing Rights Sources: Letter - IND, SYC	Downzoning	Height and Floor Area is reduced from what is permitted today when all the Centre Plan Built form regs are use in combination (Example Gottingen Street)	Change recommended — New standards aimed at overall change to the regional centre will result in some existing flexibilities being reduced but where current zoning is seeing successful development it is not the intent to make substantial change to these areas.
	Development Permits	Grandfather development permits that have been issued.	Change not recommended — Most development permits have a sunset timeframe. Any permit issued under current standards will be grandfathered until its expiration date.
	Development Agreements	Proposed heights and GFARs should reflect current Development Agreements.	Change not recommended — Development agreements are contracts that are meant to be built within an expected timeframe.
	Non-Conformance	Incentives should be made to re-invest into non-conforming structures by allowing additions or expansions.	Change recommended - In any CEN-2, CEN-1, COR, HR-2, or HR-1 zone, the restrictions in the Halifax Regional Municipality Charter respecting non-conforming structures are relaxed by allowing them to be extended, enlarged, or altered if the non-conformance is not made worse. Non-conforming structures in all other zones are regulated by the Halifax Regional Municipality Charter, as amended from time to time.
Non-conforming uses created under the Centre Plan will mean property owners will lose the ability to invest in the properties that they conform under today.		Change not recommended — The draft non-conforming standards allow for continuation and renovation of buildings, however, the expansion of non-conforming uses is not supported.	

Theme	Sub-Theme	Comment	Response
3.2 Re-zoning Requests Workshop - COM, Letter - IND, Social Media, Letter - COM, SYC, Letter - POL, Letter - Public, Workshop - IND	Centre Designation	Extend the Quinpool Centre to Connaught	Change not recommended — The extents of this Centre accommodate the goals of the collective goals of the centre, including the allocation of commercial uses in some areas and residential uses in others.
	CEN Designation	Concern over some [CEN1/2] designation/zone boundaries such as through block Gottingen to Creighton - these blocks should be half way unless already compromised [consolidated] like Salvation Army or Vimy.	More discussion Needed – the extents of Corridors and Centres is being further considered as part of the overall review.
	Corridor Designation	Concern with the up-zoning (Corridor Designation) of Robie between Spring Garden and Quinpool because it will endanger the nice old homes on a tree lined street and replace it with 4 to 5 story wood boxes. The lots aren't deep enough for major development. This will limit access to light for the adjacent properties.	Change not recommended - The up-zoning for this area is intended to enable additional uses, not specifically new buildings. Further, heights have been kept lower on portions of this corridor to dis-incentivize demolition.
	Corridor Designation	Concern that the designation of Pleasant Street as a Corridor will make it a thoroughfare.	Change not recommended — The intent of enabling more density close to the street edge is to promote a pedestrian realm that can result in more uses and a reduction in traffic speeds.
	Corridor Designation	Support for Grahams Corner to be selected as a Corridor for higher residential density. 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.	Change recommended — Subject sites are already designated as COR (Corridor)
	Corridor Designation	Policy is not clear about the zone (e.g., COR) being not just about redevelopment, but also about enabling reuse of existing buildings. Policy is needed to address when somebody comes in asking for a rezoning, staff or a client representative can point to policy saying “in your case, it’s not about being able to build a six-storey building — it’s about enabling new uses.”	Change recommended — Staff intend to include more detailed policies about the intent of designations.
	Corridor Designation	Comment that lot depth of about 40m (130ft) would be the bare minimum to allow for architecturally feasible midrise typologies that include double loaded corridors and adequate transitioning measures to ER-zones. It	More discussion needed – Staff is further evaluating the depth/extent of corridor with respect to viable built form.

		appears that COR boundaries are consistently one lot deep throughout the structure map and we strongly recommend extending zoning boundaries to the next lot boundary to meet a 40-meter minimum.	
	Corridor Designation	Concern over Corridor designations infringing on established residential – example of access to COR uses from Established Residential areas.	Change recommended — Package B will ensure that COR uses cannot be accessed via Established Residential zones.
	Corridor Designation	Concern over the planned rezoning of the north side of Pepperell Street. <ul style="list-style-type: none"> • Concern that proposed changes would fundamentally alter the character of Pepperel as a residential, low-rise area. • Both sides of Pepperell Street are seen as part of the residential neighbourhood area that extends south of Pepperell and are not part of the Quinpool Road corridor (except maybe the parking lot opposite the former Ben’s bakery). • Strongly opposed to changing the existing height and zoning restrictions for the residential properties on Pepperell Street and want to see the character of this neighbourhood preserved. 	Change not recommended — Staff feel that this designation provides a transition via the CEN-1 zone to the Established Residential uses on either side of the Quinpool Road Centre. There are also conflicting opinions resulting from the consultation submissions – local residential support for this centre has been received.
	HOR-X Designation	Support for allowing 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.	More Discussion Needed- this entire area is being further evaluated for multi-unit residential development.
	HOR-X Designation	Request to add two blocks to the Higher Order Residential areas - 1. Tower / Inglis / South Park/Victoria. 2, Victoria / South Park / Tower / South. A lot of the dwellings contain various forms of multi-s now, with only a few single and 2 unit dwellings.	More Discussion Needed- this entire area is being further evaluated for multi-unit residential development
	HR/ER Designation	Repeated request for 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 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.	More Discussion Needed- this entire area is being further evaluated for multi-unit residential development
	HR Designation	In contiguous HR areas, it makes no sense to mix HR-1 and HR-2 zones, because why would some properties on a street be allowed to have a grocery store but not others? Need to rationalize the HR zones so each contiguous block is either all HR-2 or all HR-1.	More Discussion Needed - HR designations are being further evaluated.
	Industrial Designation	Dartmouth has more tolerance for mixed-use (i.e., industrial uses in residential neighbourhoods) than Halifax. Consider having special Dartmouth zones for this purpose.	Change not recommended — While the Centre Plan is promoting mixed-use zones broadly, staff feel that industrial uses (with the exception of local manufacturing as defined in the draft LUB) are not compatible with residential uses. Package B will outline where heavier industrial uses are permitted.
	FGN Designation	Why are the lands outside (west of) the railroad tracks in the Mumford FGN	Change recommended — This area will be further evaluated for alternate designation than Future Growth Node.

Theme	Sub-Theme	Comment	Response
3.3 Strategic Growth & Incentivizing Development Source: Letter - Public, Workshop - IND, Workshop - COM, Letter - COM, Letter - IND, SYC	Urban Structure	Seeing Urban Structure as a transect, the Centre Plan typologies are not clearly defining the variety of proposed neighbourhood structures, or built-form typologies, that I understand you want to encourage. <ul style="list-style-type: none"> - For example, a typical new-urbanist transect approach would recognize the Regional Centre being composed of: T6-Urban Core; T5-Urban Centre; T4-General Urban; and, T3-Suburban. - The transect is effective. - It is still hard to read the Centre Plan Package A Urban Structure policies and determine what areas should be designated a Centre, Corridor, or Higher-Order Residential. For example, what makes Gottingen Street a Centre as opposed to a Corridor? In my reading of the policy and the built forms the Land Use Bylaw encourages, it suggests all of the Regional Centre is having a T-5 applied to it. 	Change recommended – Efforts will be made to provide more detailed policy respecting the intent and rationale for the Urban Structure.
		The historical norm of single family dwellings in the blocks from Young north is systematically being compromised from all sides.	Out of Scope – Low-density dwellings in this area are being addressed in Package B.
		The Centre Plan proposal has, so far, left many neighbourhoods undisturbed. This is a good thing. There are many areas in the city that can suffer more development - examples include Young Street - between Robie and Windsor which has seen significant construction recently; the north side of Almon Street in same block, some of the grocery store parking lots where the streetscape could be improved with some townhouse like buildings to screen large parking lots (or at least a tree screen). There are areas on Kempt Road and over to Massachusetts Avenue which could bear some infill, there are even quasi-industrial areas in the south end suitable for medium height residential buildings.	More Discussion Needed – Staff will continue to evaluate the appropriateness of all proposed designations.
		Balance density between Halifax & Dartmouth and distribute density across the regional centre.	Change recommended — Staff feels this this has been achieved in the proposed Designations in the SMPS.
		Don't agree with Young and Robie and down Young St towards Windsor as being zoned highrises. I don't agree with that design. Those that have been approved or built should be an exception, not set the tone for that area. We should be creating live/work areas that are walkable and friendly. Highrises don't do that and they are not needed to reach the density we would like to see.	Change not recommended — The Plan has identified these areas as locations where growth is appropriate and can be accommodated.
		Compensation should be give to low density homeowners abutting lands designated Corridor or Centre.	Change not recommended — The Municipality does not compensate property owners abutting new development. The Plan enables strategic growth and mixed-uses abutting established residential areas as an overall benefit to the Regional Centre and not an imposition.
		Not in support of increased heights limits along Gottingen, Agricola, and Falkland.	Change not recommended — In general, proposed heights are intended to enable strategic growth, and staff feel that the proposed heights for these locations, are felt to be appropriate for the context.
		"Intensification" is making the Peninsula less attractive to families and will lead to a further reduction in the proportion of owner-occupied homes. The new construction on Quinpool Road is an example of what is wrong with the planning process - it is too large and occupies too much of the lot on which it is situated.	Change not recommended — One of the defining goals of the plan is to increase density by enabling development that accommodates more people living in the Regional Centre.
		Overlaying growth areas (Centres, Corridors, even HR) on existing public housing and low-rent areas will threaten affordability for the people who live there today. Need to find a way to encourage new growth without hurting people with low incomes. Best way would be to encourage redevelopment of vacant lots, rather than tear-downs.	Change not recommended –The Centre Plan does address affordability in one respect, through density bonus considerations, however the Centre Plan is not intended to solve the overall challenge of affordability in HRM without support from other projects.
Urban Fabric	Building sites like the Margueretta occupy 10 or more original lots in the Schmidville urban fabric. Can you do more in your LUB or Design Manual, beyond the "6 metre articulation" requirement, to require developers to	More Discussion Needed – Staff are further evaluating changes to the Design Manual and LUB standards in this respect.	

	create "10 experiences" on the lot? We need stricter rules so that we don't just get more plate glass and mullions masquerading as "articulation".	
	Encourage more architectural styles, not just small storefronts.	Change not recommended — The Plan does not prescribe specific architectural styles.
Cost	Consider the cost of requiring high quality materials and designs, and the implication of diving development elsewhere. May need to provide more height to compensate for the costs.	Change not recommended — High quality design should be the goal at any height.
Strategic Growth	Consider the impacts of growth on the school system.	Change recommended — Most of the schools in the Regional Centre have long been under capacity and may benefit from the density enabled through the Centre Plan. Discussion with the School system planners will continue to ensure they are aware of this plan.
	Growth "options" (Centres, Corridors, FGNs, etc.) are not prioritized. Your plan could include policy that HRM will help you get your project approved if you're building adjacent to a BRT station. There should be some resistance if somebody's trying to rezone ER to COR along Agricola.	Change not recommended — The Plan accommodates balanced growth across the Centre.
	Extend the planning timeframe beyond 2031 and consider different growth scenarios (high, medium and low). Consider a slow growth, and decline scenario and ensure the Plan can respond to such scenarios.	Change not recommended — There is a role for long term planning and shorter time horizon planning. The next Regional Plan will determine outlooks for the whole Region which could be carried to Secondary Plans. Long-range Plans (greater than 20 years) can be prone to losing emphasis on growth and other targets.
	Consider a more realistic ratio of 10:1 or even 20:1, meaning, a land inventory of 10 or 20 sites approved with zoning criteria would be required to meet the development targets above.	More discussion needed — Analysis of the full build out potential will be completed to assist in discussing land inventory. The work done on land inventory in building this plan suggests that there is more capacity allowed than is implied by this comment.
	The wide application of site plan approval with a design review by a volunteer committee and an appeal process is of concern. While the uncertainty of a DA process does discourage development to some degree, reducing allowable heights and imposing arbitrary GFAR that together slash achievable density will do nothing to spur development in such areas. Instead these areas will continue to underperform as land owners wait for rents to increase or for the rules to change.	More discussion needed — The draft Plan is in line with supported Council directives to enable growth in key areas with a reduction in development agreements to expedite the development approval process. There will be consideration of changes to process and the scale of development that requires Site Plan Approval in an effort to allay concerns with respect to processing times.
Incentives	The theoretical development capability allocated by Centre Plan simply does not provide enough real world incentive to redevelop, and that HRM has not undertaken a meaningful analysis of the impacts of its proposed limits. Undertake some meaningful feasibility studies on key sites to understand development economics.	More discussion needed - While incentive to redevelop was considered through knowledge gained over applications and financial analysis, staff remains willing to discuss financial viability of proposed projects with applicants or other interested parties as we amend the planning documents.

4. Built Form – Buildings

CDAC Comment

Theme	Sub-Theme	Comment	Response
4.1 Built Form – Density Sources: SYC, Letter - IND, Letter - Public, Letter - COM, Workshop - COM, Workshop - IND, Letter- Public	GFAR	<ul style="list-style-type: none"> • If you're using GFAR, eliminating height requirements is essential to provide clarity on site and architectural design. • Even on many non-challenging sites, heights plus setback requirements plus coverage limits often prevent maximum GFAR from being achieved, which defeats the purpose. • GFAR may be sufficient to regulate built form on its own, even in the absence of any other built form control. • [Conversely, if you are going to keep a height maximum, relax your other built form requirements somewhat.] • On sloping sites, height limits are awkward to administer and may not result in optimal built forms. • Habitable (non-mechanical) penthouses can be a desirable way to provide rooftop amenity space, but are currently prohibited. A pure GFAR system would address this. • GFAR does not work well with restrictive lot coverage requirements (like 50% in the HR zones) 	More discussion needed — It is recognized that currently GFAR cannot be fully achieved on all sites when other built form regulations are applied. Discussion is needed which requirements can be removed or modified to still achieve the overall goals of Centre Plan. Options include, but are not limited to: <ul style="list-style-type: none"> - Model and consider increasing heights in specific locations to realize GFAR but consider impact on mid-rise, high-rise typology; - Remove heights in Centres but protect other built form dimensions; - Investigate removal of heights in corridors;
	Exterior cladding and glazing	The list of prohibited cladding materials is arbitrary and is not consistent with policy objectives encouraging design innovation. In some instances, plywood or concrete blocks might be used as a design element.	Change not recommended — The list of prohibited materials is not arbitrary,
	Privacy	In many areas, a new building will potentially have some balconies overlooking backyards in an established residential neighbourhood. Restrict where balconies can overlook depending on what is around the building — and find ways to limit privacy impacts generally.	Change not recommended — Balconies provide important amenity space and limiting their use would not address privacy issues.
	Definitions of low-/mid-/high-rise	HRM needs a more realistic definition for these building typologies than 3-storey low-rise, 6-storey mid-rise, and “high-rise” for anything 7 storeys and up.	Change not recommended — The intent of setting a threshold for a high-rise form at 7 storeys is to encourage either short and wide, or tall and slender built forms. The typology is aligned with the goals of the Plan and delineations in the building code for defining different requirements for buildings. A hybrid model is not supported.
	Density bonusing	A density bonusing threshold of 3.5 GFAR is effectively a development tax on taller buildings (i.e., anything above 6 storeys). Do you really want to do this?	More discussion needed — Options may include: <ul style="list-style-type: none"> - Maintain a flat threshold to direct density bonusing at tall buildings, largely in Centres - Introduce a pre and post GFAR that bonuses 30% across the board in Package A areas, or smaller post-bonus for Corridors and HOR areas - Increase the threshold for GFAR - Maintain the threshold but reduce the coefficient value from 67%
	Form-based code	Your regulations do not consider the block as a whole, but rather encourages one-off designs on a parcel-by-parcel basis. There is no legible block structure; the predictability of a form-based code has been lost.	Change not recommended. An architecturally form-based code would be required to address this with specific themes for different areas. This was not identified within the scope of the project and would require a significantly different approach.
	“Important Structures”	Introduce a designation for “important structures” (i.e., those with significant cultural or heritage importance) that exempts them from built form requirements as long as the structure is protected and any additions are sensitive to the existing building and surrounding area.	Change recommended — Package A provides flexibility for registered heritage properties through a DA policy. Package B will seek to address flexibility for prominent institutional buildings.
	Flexibility	Different areas need differing amounts of regulation. Gottingen Street has benefited from leniency (generous height limit, no setbacks, full coverage, permissiveness in land use), which promotes innovation and rebirth. In general, given the wide range of property sizes, shapes, and contexts across the Regional Centre, developers need the ability to adapt to unique conditions. “One size fits all” rules are unworkable.	Change not recommended — The built form requirements were developed based on best practices to realize more human scaled developments. Minimum setbacks and stepbacks are crucial in this respect. Staff are exploring options to refine options for all areas to realize strategic growth.
	Height mapping	On larger sites, HRM should vary the maximum heights map across the site, to encourage height in the middle of the site that transitions to lower forms elsewhere on the same property, thereby guaranteeing protection	More discussion needed — Some larger sites include a distribution of height & GFAR.

		for adjacent lower-density neighbourhoods and streetscapes. At the very least, allow flexibility in maximum heights so that an appropriate design response can be developed in response to local conditions.	
	Tower floorplates	<p>Various comments:</p> <ul style="list-style-type: none"> • For buildings under 10 storeys, a 750-square-metre tower floorplate requirement is too small. • 750 sq. m is appropriate for taller buildings. • 750 sq. m significantly reduces the yield of a site/is not buildable; 950 sq. m is more feasible. • 750 sq. m is too small for a commercial high-rise. • Larger floor plates are more energy-efficient. <p>Or use wind and shade studies to determine a suitable tower floorplate on a site-by-site basis.</p>	Change not recommended — Larger tower plates are allowed in the downtowns where commercial uses are desired. Commercial uses can be accommodated within the podiums throughout the Regional Centre. The slim towers are mandated to provide access to light, and protect public realm from shadow and wind impacts.
	Tower separation	<ul style="list-style-type: none"> • Requiring 25 metres between towers will significantly limit what is possible on many sites • 25 metres is too little; 40 metres would be better • Only require the 12.5-metre internal property line setback where the adjacent property might conceivably also have a tower on it. 	Change not recommended — Staff recommend maintaining the proposed regulations based on best practices across North America.
	Viewing triangles	Please show some data to justify viewing triangles, because otherwise they are expensive for developers and unsuited to urban environments (and especially small lots). Allowing drivers to turn faster is counter-productive when the objective is “pedestrians first”. This requirement should be removed; they compromise architectural design at corners, they undermine objectives to activate ground floors, and over time they will make all major intersections look generic.	More discussion needed — May only be required within the ground floor of buildings or eliminating the requirement.

Theme	Sub-Theme	Comment	Response
4.2 Built Form - Setbacks/ Stepbacks/Coverage Sources: Workshop - IND, Workshop - COM, Letter - IND, SYC, Letter - COM	Crime prevention through environmental design (CPTED)	Review your requirements for parking garage doors and other setbacks through a CPTED lens. Required setbacks are going to be used for garbage storage and driveway lanes — was that the intention?	More discussion needed — This was recommended by engineering for safety reasons. Reduction of the requirement will be evaluated.
	Structural constraints	Review your requirements for driveway widths, side yards, stepbacks, etc. through an engineering lens so you are not unintentionally creating situations that require expensive solutions [or aesthetic downsides like columns in the middle of units].	Change not recommended — Similar provisions have been implemented in the downtown.
	Lot coverage	Be aware of where you are increasing lot coverage permissions significantly from what’s there today — this might incentivize redevelopment even if heights are kept low.	Change not recommended — The intent of Package A zones is to encourage growth.
		Why bother with lot coverage when you are imposing such stringent yards/setbacks on all sides anyway?	More discussion needed — In some areas increased lot coverage may be considered or the maximum eliminated; other built form requirements can address positioning of buildings on a lot.
	Lot coverage – Higher-Order Residential	The 50% maximum lot coverage [as well as the other built form requirements] is too limiting in the HR zones; it promotes a very suburban (towers-in-a-park) and pedestrian-unfriendly built form and will inhibit redevelopment. What is the rationale for the 50% number? It should be 80%.	More discussion needed — Lot coverage increases are being considered in HR areas.
Transition requirements too onerous	In HR zones in particular, properties are often subject to standard 3.0-metre front setbacks as well as 6.0-metre rear setbacks due to their adjacency to established residential areas. This eats up quite a lot of development potential.	More discussion needed — All setbacks are being further evaluated.	

	Heights should be aligned with lot depth	On Agricola, the same height limit is applied to both sides of the corridor. But while one side has deep lots and can achieve the maximum height permitted, the other side has shallow lots and cannot. Heights should set realistically based on the lot fabric.	Change not recommended — A deeper lot can support a greater floor area. In general heights are established in this area to respect existing local character/built form.
	Streetline setbacks	Eliminate the 1 -metre streetline setback requirement on Gottingen Street; it is not in keeping with existing buildings.	Change not recommended — This modest setback is intended to create an improved pedestrian environment over the long term.
		There needs to be more of a setback between buildings and front property lines, which will allow for sidewalk cafes, more landscaping and street trees, and benches and seating areas	Change not recommended — Larger setbacks could be too much of a departure from the existing streetline and could discourage development potential in this area.
	Setbacks too onerous	In general, the setbacks and setbacks on all sides are substantial and have significant implications for the resulting building. To ensure that the built form requirements are “buildable”, please take into consideration elements such as hallways and stairwells, and find a way to accommodate small or unusually shaped lots.	More discussion needed — Staff feel there overall the proposed regulations strike the right balance, but further refinements are being considered.
		Consider allowing buildings to build back out to the front property line on the second storey and above.	Change not recommended — Proposed regulations already exempt 25% of the streetwall to be exempt from setback. Further exemption would compromise the intent of a human scaled and pedestrian oriented design.
	Mid-rises	A streetwall setback is not necessary on a four-storey mid-rise building.	Change recommended — This will be revised in revised documents for four storey buildings.

Theme	Concerns related to	Comment	Response
4.3 Built Form - Streetwall Sources: Letter - IND, Letter - Public, SYC, Workshop - COM, Workshop - IND	8-Metre Streetwall Height	<p>A number of concerns related to 8 m streetwalls:</p> <ul style="list-style-type: none"> • does not relate to street widths and are not context sensitive. • architecturally speaking, 8-metre streetwalls for both mid-rise and high-rise forms are too low of a “base” and ill-balanced volumetrically. • do not relate to pre-existing fabric with as-of-right 3-storey buildings. • would not allow sloped roofs on three-storey buildings. • does not account for all structural elements necessary, including insulation and guard heights for patios, and will not result in a two-storey streetwall as intended. • not all elements of a building need to align to the existing adjacent fabric to be comfortable contextually. • 8-metre streetwall in combination with shallow lot depths and low FAR values are resulting in unfeasible developments for many areas (mainly COR and HR areas). • all major transit corridors like Robie Street, Agricola Street, Windsor Street, Gottingen Street, Cunard Street, and Quinpool Road merit a base-line of 3 storeys for these building typologies with further neighbourhood specific consideration for increased heights based on envisioned growth. • Suggestion to establishing the minimum streetwall height at 11 metres (3 storeys). 	Change recommended — Staff will pursue increased streetwall heights depending on context and will ensure that the streetwall maximums are determined to fit whole regular floors.
	Streetwall Height – Correlate with Right-of-Way Width	<ul style="list-style-type: none"> • Proposed streetwall heights are too generalized. • Rather than prescribing similar streetwall heights, it would be more appropriate to be context specific. • Streetwall heights should be set based on street hierarchy, right-of-way widths, and existing contexts, with possibly more shadow studies needed in order to refine the streetwall heights map. 	Change not recommended — Streetwall heights will be adjusted, but not necessarily based on street right of way.

	Items to be Exempt from Streetwall Height Calculations	The following items should be exempt from streetwall height calculations: <ul style="list-style-type: none"> • Parapets; and • Guards, such as glass guard railings. 	More discussion needed — Railings and guards are already exempt. Parapets could be exempt, up to a maximum as some parapets may be extensive.
	Streetwall Width – Prioritizing Consistency and Maximizing Building Frontages	<ul style="list-style-type: none"> • 6-metre rear yard setback parameter for corner lots in transitional areas to ER zones are inconsistent with pre-existing tighter urban fabrics. • context would dictate the interior lot-line with reduced sideyards between 2.5 and 3 metres vs a 6-metre rear yard that would result in excessively large holes in the urban fabric and in many cases compromise development feasibility. • Protect pre-existing rear yard green belts in ER-zones by somehow restricting the transitional conditions to allow for mid-rise buildings with multiple street frontages to take on L-shaped footprints (for 2 street frontages) or C-shaped footprints (for 3 street frontages) with a 6-metre rear yard setback within its core, and reduced setbacks at streetscape conditions. This could be controlled by introducing minimum building depth parameters for transitional areas to ER zones. 	More discussion needed — Transition regulations are a key aspect of this Plan but are being re-evaluated.
	Definition of Side Yard vs Rear Yard	It is unclear how a side yard versus a rear yard is defined when it comes to the transition rules. This is especially difficult for L-shaped lots. Suggest harmonizing, i.e. keeping the setbacks the same on all sides.	Change recommended — Staff are working on new definitions for yards based on feedback.
	Transition Regulations vs Landscaped Buffers	Harmonize built form transition regulations with landscaped buffer requirements.	Change recommended — The regulations are harmonized (2.5 m).
	Buffer Requirements	Should the landscape buffers have a width requirement? What are the goals, and can they be achieved in a variety of ways? For example, what are the goals of landscaping in surface parking lots – like reducing heat island effect, shade, increased tree canopy cover, etc. Current requirements are based on Urban Forest Master Plan.	Change recommended — Policy can clarify the intent of various landscape buffers. This may depend on the intent of the buffers. Landscaping requirements should be driven by function, not just aesthetics.

Code Theme Sources	Sub-Theme	Comment	Response
4.4 Built Form - Ground Floor Height Sources: Letter - COM, Workshop - COM, Letter - IND, Letter - Public, SYC, Workshop – IND	Ground Floor Height Requirement	A required ground floor height of 4.5 metres may be too prohibitive, cutting into the overall height. It also creates significant problems with regards to sloping conditions. A ground floor height of 4 metres would be more appropriate and would align better with the code requirement for stair landings.	More discussion needed — Staff is of the opinion that the ground floor height requirement is warranted in Centres and on Pedestrian Oriented Commercial Streets to encourage retail. Staff is also further testing the actual numerical standard. This requirement is also being re-evaluated in Corridors and HR areas.
		Apply a required ground floor height of 4.5 metres only along Pedestrian-Oriented Commercial Streets, since these streets are the only ones that have a requirement for ground floor commercial uses.	More discussion needed — The over-arching intent of Centres is to provide access to commercial uses that support complete and walkable communities.
		Apply a required ground floor height of 4.5 metres only in Centres and Corridors. It ought to be focussed, not dispersed given retail trends downward.	More discussion needed — See above.
	Ground Floor Height Requirement – Neighbourhood Specific Context Sensitivities	Suggesting flexibility in the ground floor height requirement to allow for neighbourhood specific context sensitivities where 4.5 metres would be out of scale for smaller building typologies, residential uses, and narrower street widths (e.g. Agricola Street). A lower height around 3.7 to 3.9 metres on Agricola Street would allow for a finished ceiling height of +/- 3m after accommodating allowances for mechanical/electrical systems. A 3-metre finished ceiling height is in keeping with the street scale of Agricola.	More discussion needed — See above.

Theme	Sub-Theme	Comment	Response
4.5 Built Form - Heights Sources: Letter - Public, SYC, Social Media, Workshop - COM, Letter - IND, Workshop - IND, Letter - COM	Features to be Added to the List of Height Exemptions	<p>The following items should be exempt from maximum height requirements:</p> <ol style="list-style-type: none"> 1. Parapets; 2. Guards, such as glass guard railings; 3. Non-habitable spaces, so that peaked roofs will not be penalized (recommended to check the Calgary LUB); 4. Common amenity spaces (e.g. rooftop clubhouse); 5. Architectural expression in rooftop design; 6. Pitched roofs of 6-7 metres; 	<p>Change recommended (1-2). Parapets, guards are already exempt.</p> <p>Change not recommended (3-6). Peaked and pitched roofs can be habitable spaces. Relaxations for architectural expression are addressed in the Design Manual relaxations. Common amenity spaces are part of the gross floor area.</p>
	Height Exemptions - Refine	The height and height exemption requirements are forcing or assuming a box form at the top of the structure, which the building may or may not be. It may also lead to a poor design outcome.	Change not recommended - height limits should only allow for moderate flexibility if they are used. They will attempt to account for overrun of mechanical / elevator systems.
		Remove parapets from the maximum 30% area calculation of height exempted volumes.	Change recommended
		Height exemptions under the LUB to a maximum height is a problem (example would be elevator enclosures, mechanical penthouses) because you cannot determine what the size of these structures will be in the future. Standards change over time.	More discussion needed – Regulations will be updated as necessary from time to time
	Height - Refine	If there is going to be a height maximum, then the other requirements need to be more relaxed to achieve buildable buildings. Heights are too prescriptive for each area, and need to be more general.	Change recommended — Height maximums are being evaluated as part of other built form considerations.
		20 metres will not allow for a 6-storey building.	Change not recommended — 6 storey buildings are possible. Where a 4.5 m ground floor height is required, an additional metre of height may address the issue.
		Heights along Robie Street north of Quinpool – 20 storeys, 6 storeys, and then 20 storeys. Why? Seems weird.	Change not recommended — The modulated heights are intended to protect existing character and built form of the streetscape.
		On Quinpool Road, the east end would receive a half-kilometre stretch of high-rises (like Brunswick between Duke and Cogswell; a miserable street), while the rest of Quinpool would remain in its current underdeveloped state. Lowering the east end of Quinpool would spread development more evenly and make a better street for pedestrians.	Change not recommended — The built form regulations will ensure a human scaled and pedestrian oriented development in the east part of Quinpool while accommodating strategic growth.
		To encourage walkable and commercially attractive corridors, existing sunlight exposure should not be sacrificed to height.	Change recommended —
		Maintain Heights as Proposed	I agree with the height limitations put in place to restrict corridors to 6 storeys.
	Keep heights to 2 storeys on the Agricola corridor from North down to Cunard. The uniqueness of this commercial area is its “shop like” atmosphere and feel. Many new small businesses have created a great walkable area at a lower 2 storey height.		Change not recommended — The proposed height standard on Agricola, between North and Cunard, is 14 m to encourage development.
	Height Increase – Generalized	Higher heights should be allowed on corners. Sites at end of corridors need additional height.	Change not recommended — Prominent sites have been already allowed additional flexibility. Some corners may infringe into established residential areas.
		The COR and HR height limits are too low to entice development. 14 metres is too low in the HR zones; it will not encourage development. The 20-metre is workable.	Change not recommended — Variation is encouraged in COR and HR zones to provide a range of housing stock and density based on local context.

	<p>Height restrictions are way too low for the growth areas. In spirit, this plan is excellent, but putting height restrictions of 15-20 storeys in place for high density areas is just too restrictive. A 15-20 storey building is a medium-rise at best. We should be looking at 25+ storeys as a starting point for these areas. There is a strong bias against height that will result in many sites being left in their current state due to resulting lack of economic redevelopment viability.</p>	<p>Change not recommended — The Plan seeks to distribute growth strategically throughout the Regional Centre. While the heights framework is being evaluated in the context of GFAR, density and growth will be distributed.</p>
	<p>With shorter buildings this means more land and lots are required to meet the city’s targets. One of the best things about Halifax is the abundance of trees, green spaces, parks and open areas, this makes Halifax walkable. With taller buildings in the right locations, we would have a much better city, more efficient, more walkable, and far better communities with 100 buildings accomplishing the same targets for total units.</p>	<p>Change not recommended — The Plan does provide for tall buildings in the right locations. Council provided direction to distribute growth across the Regional Centre.</p>
Height Reduction – Generalized	<p>Drop the height along Agricola, from North to Cunard, to 11 metres to protect the funky look of the neighbourhood (reduce height from 14 to 11 metres).</p>	<p>Change not recommended — See above.</p>
	<p>In Portland Street Corridor near Rodney Road and Maynard Lake, recommend that the maximum height of a building is limited to 3-4 storeys, not 6 or sometimes 8 storeys as currently identified in the plan. Lower buildings (townhouses, buildings 3-4 storeys) are more aligned with the existing character of the neighbourhood.</p>	<p>More discussion needed — The depth of the corridor in this area is being evaluated and heights may be adjusted in certain areas. However, Portland Street is a high frequency transit corridor and density is encouraged.</p>
	<p>Pleasant Street – We would like the plan to encourage low rise 3-4 storey wood frame construction for infill lots in corridor areas.</p>	<p>Change not recommended — Pleasant Street is a high frequency transit corridor with lot depths that can accommodate the proposed density and height within the Corridor designation.</p>
Height Reduction - Generalized	<p>Building heights on Wyse Road should be limited to no more than 8 storeys.</p>	<p>Change not recommended — Parts of Wyse Road can support more than 6 storeys. Additional density may be required to encourage redevelopment of vacant or under-utilized sites.</p>
	<p>Corridors should be capped at 4 or 6 storeys, not 8 storeys. Lower heights along the proposed Windsor Street Corridor. Lower heights along the proposed Chebucto Road Corridor from 6 to 4 storeys.</p>	<p>Change not recommended — Parts of some Corridors can support more than 6 storeys. Additional density may be required to encourage redevelopment of vacant or under-utilized sites.</p>
Heights and their Impact on Shadowing	<p>HRM staff have misled the public by saying that the shadows from thin towers move more quickly than the shadows from short stubby buildings. That is false, as all shadows move at the same pace.</p>	<p>Change not recommended — Staff modelled this and shadows from different built forms move at different speeds.</p>
Measuring GFAR	<p>With GFAR as a tool we would have a simple calculation for the GFAR, but it may have unintended consequences with respect to what gets “cut” from building design to maximize leasable space in the building.</p> <p>If we allow some space to be exempted we will be moving from Gross Floor Area Ratio (GFAR) to a New Floor Area Ratio calculation (more commonly communicated as FAR).</p> <p>The following features were suggested as being potentially excluded from the FAR calculation:</p> <ol style="list-style-type: none"> 1. Cultural spaces 2. Recreational spaces 3. Above grade parking 4. Internal amenity space 5. Ground Floor commercial space 6. Internal circulation (hallways) 7. Mechanical / service rooms 8. All non-leasable space 9. Exterior wall thickness 	<p>More discussion needed — Staff are evaluating GFAR vs. Net FAR. Staff also want to ensure that GFAR or Net FAR continue to be a robust measure of density are help continue to improve the service delivery on application timelines.</p>

		<p>10. Void space (double height floors) 11. Mezzanine 12. All non-leasable space</p> <p>Consideration for ease of calculation and repeatability / consistency in determining FAR was discussed throughout the workshops.</p>	
	<p>Altering GFAR Values</p>	<p>Requests were made by individual property owners for increased GFAR on several sites within Centres, Corridors, and Higher Order Residential designations.</p> <p>More general concerns with the combination of GFAR and height resulting in buildings that represent lower GFAR and would push potential development into the realm of being less economically viable.</p> <p>Additional comments suggested that GFAR should be applied with a more broad brush and not applied on a parcel by parcel basis.</p>	<p>More discussion needed — The heights framework is being re-evaluated (see above). Increases to proposed GFAR need to be carefully evaluated.</p>

Theme	Sub-Theme	Comment	Response
4.6 Built Form – Design Guidelines Sources: Letter - IND, Workshop - IND, Workshop - Landscaping, Letter - Public, SYC, Letter - Public	Design Manual	The new plan will disincentivize development in the core.	Change not recommended — The Centre Plan and Regional Plan balance urban and suburban growth.
		Establish a maximum timeframe for Site Plan Approval of 4 months.	Change not recommended — However, in Downtown Halifax, current approval times are approximately 60 days once an application is complete. Staff believe that clarified submission requirements will improve timelines.
		Focus on the feedback rather than public image by requiring no public involvement meetings for the SPA applications process and having applicants submit only to the Development Officer and DRC. Public meetings create extensive delays in the process and restrict true committee responses as members' clients are the public.	Change not recommended — Public consultation, particularly for larger projects, is an important part of the planning process.
		Incorporate City of Toronto's tree protection standards in the Design Manual.	Change recommended — While outside the scope of Centre Plan, the Urban Forest Master Plan implementation plan contemplates a private tree protection by-law.
		Use images that better relate to section objective or intent.	Change recommended — Design Manual imagery is being refined.
		Reduce number of Relaxation (Variance) options and include a percentage provisions for variations to clarify what is a minor versus major variation. For example, include a minor variation provision of 10%.	Change not recommended — The current list of relaxations has been reduced from that in Downtown Halifax, and each of the remaining relaxations serves an important purpose. However, staff will review the list and refine as needed.
	Design review - more HRM resources needed	Expand numbers of DRC members to address increase in applications resulting from new Plan	Change recommended — Workload for the DRC will increase because of Centre Plan, and a more detailed discussion of how to manage this workload is needed.
	Flexibility – Height	The manual needs to provide more situations where height may be varied.	Change not recommended — While the relationship of height and GFAR are being considered (addressed elsewhere in this table), height limits (where they <u>do</u> apply) remain an important built form control.
Methods	<ul style="list-style-type: none"> The method section should be more instructive and not prescriptive. Proposal: Change the methods to “suggested methods”, “methods to consider”, or “examples”. The language should change to identify the objective as the only clear requirement with the methods clearly stated as ways to achieve the objective. There are too many methods for each objective. There are hundreds of methods to meet each objective, not the limited number provided. Do not list methods. Remove any method that quantifies something. For example, requiring multiple awnings as a method means at least 3. Remove methods that read more like objectives than methods for achieving and objective. 	More discussion needed — Staff will refine the hierarchy of objectives and methods in the draft Design Manual. The intention is to have mandatory and robust objectives illustrated with suggested methods.	

5. Built Form – Site Design

CDAC Comment

Code Theme Sources	Sub-Theme	Comment	Response
5.1 Amenity Space Sources: Letter - IND, Letter - Public, Letter – COM	Amenities for families	Multi-unit residential buildings should be required to provide indoor, family-friendly amenity spaces such as playrooms and stroller parking	Change not recommended — Amenity space is required, but specific types of amenity spaces are recommended to be driven by market needs.
	Green amenity space	Cities need lots of green space and this should be required as an amenity for the neighbourhood. Great streets usually include great landscaping, with places to rest and gather. Also, development affects the urban forest, and more emphasis should be placed on preserving mature trees (not just chopping them down and replacing them with new baby trees) and increasing the total amount of tree canopy.	More discussion needed — We need to be more coordinated in monitoring and providing equitable access to green space based on growth and other needs.

Theme	Sub-Theme	Comment	Response
5.2 Site conditions Sources: Letter - IND, SYC, Letter - COM, Letter - Public, Workshop - IND	Circulation	Large parcels should be required to support pedestrian movement with paths between buildings, adjacent properties, and public sidewalks.	Change recommended — Draft policy for development agreement on large sites and future growth nodes supports connectivity.
	Corridor lot depth	Corridors that are one lot deep will be difficult to develop, and may also pose access issues.	More discussion needed. The current draft tries to balance allowing for development, and preserve the established community behind the corridor. Options: <ul style="list-style-type: none"> - Maintain 1 lot deep - Allow 2 lots deep - Evaluate site specific conditions - Lot consolidation policy to allow change of boundary
	Drive-throughs	Drive-throughs promote unhealthy behaviour and eating habits	Change recommended — Not permitted in Package A zones.
	Servicing	A proliferation of new commercial spaces will require areas designated for the unloading of transport trucks.	More discussion needed — Certain threshold of development already requires off-street loading spaces. Additional requirements may impact affordability and pedestrian environment. On-street loading spaces also regulated by TPW.
	Sloping sites	The built form requirements favour flat, squarish parcels of land, and many requirements will be difficult to achieve on sloping sites, e.g.: <ol style="list-style-type: none"> 1. Requirement to keep underground parking garages below an elevation of 0.25 metres relative to the streetline grade 2. Requirement to calculate the streetwall height in 8.0-metre increments will compromise commercial floorplates <p>Allowing more variances/flexibility will help to address unique situations.</p>	More discussion needed — Conflicting feedback has been received.
	Overly prescriptive requirements	Some built form requirements, such as requiring all grade-related units to be 0.25 metres above grade, are unnecessarily prescriptive.	More discussion needed — This minimum requirement is provided for privacy reasons.

Theme	Sub-Theme	Comment	Response
5.3 Parking Requirements Sources: Letter - IND, SYC, Workshop - COM, Workshop - IND, Letter - Public, Social Media, Letter - COM, Workshop - Landscaping	Bike Parking – Cycling Infrastructure in ROW	Policy 96 of the MPS should be amended to prioritize ensuring that cyclists have the infrastructure they require in a network of separated cycling facilities. Consideration should be given to adding a minimum standard of cycling facilities that are required within a relatively short timeframe to deliver this infrastructure in a concerted way.	Out of scope. This level of detail is contained in the Active Transportation Plan.
	Bike Parking Requirements	Section 169 of the LUB has a requirement for shower facilities that represents an overbuilding of such facilities (one for every ten Class A bicycle parking spaces).	Change recommended — Staff are evaluating requirements.
	Parking Maximums	Parking maximums should be considered under the Centre Plan. The cap could be based per lot, or on the type of use.	Change not recommended — The general removal of parking requirements is intended to prevent over-building of parking, and allowing the market to drive decisions.
	Parking – Low-Density Residential Uses	Amend Section 152 of LUB to remove requirement of providing vehicular parking on four or less unit dwellings in Corridors. By exempting multi-unit dwellings in Corridors from providing parking, but requiring up to three spaces for low-density dwellings, it helps to incentivize the demolition of low-density dwellings. Also consider not requiring parking for low-density dwellings in other zones where it is required.	Change recommended — Staff are re-evaluating this requirement.
	Public Parking	Need for more public parking.	Out of scope. This is currently being considered in the Parking Strategy.
	Parking in Backyards Along Corridors	Parking should not be allowed/supported in back yards along corridors.	More discussion needed — Staff will work with compliance to understand how this could be enforced if it were to be enacted.
	Remove Parking Requirements for Small Sites	Consider removing vehicular parking requirements for small sites (e.g. sites under 15,000 square feet).	More discussion needed — Parking requirements for HR areas are being evaluated.
	Lack of Parking Requirements Along Corridors	Concerned that the lack of parking requirements for multi-unit dwellings and some commercial uses along corridors will push the parking burden to adjacent residential streets.	Change not recommended — Removal of parking requirements is a key concept of the Plan, intended to promote transit and active transportation and reduce the cost of developments.
	Remove or Reduce Parking Requirements for Heritage Properties	Since it is difficult to create new parking under an existing registered building, parking requirements can negatively impact the potential for internal conversions of heritage properties.	Change recommended — Staff will evaluate the removal of parking requirements for registered heritage buildings or sites containing such buildings.
	Remove or Reduce Parking Requirements in the Northern Portion of the Peninsula	The parking requirements in the northern portion of the Peninsula should be lessen or removed entirely, as they could dis-incentivize internal conversions.	More discussion. This is largely Package B, but parking requirements for HR areas are being evaluated.

6. Density Bonusing

CDAC Comment

Theme	Sub-Theme	Comment	Response
6.1 Framework & Economics Sources Letter - IND, Letter - COM, Letter - Public, Workshop - IND, SYC, Workshop - COM, Social Media, Letter - Public, Workshop - Landscaping, Letter - POL, Letter - RES	Framework -start at max GFAR	Change process and assigned GFARs so that the bonus starts after the maximum prescribed GFAR per site.	Change not recommended — there is a strength to the community to know an absolute maximum, and reduces the risk of unknown building volume being assigned to a site in the future.
	Framework - capture rate	Reduce framework Capture rate from 66% to 25%. The rate is seen as a tax to develop the site and fundamentally changes the financials of development and viability.	More discussion needed – staff are considering a change to the percentage based on feedback. We will be investigating the impact of the distinct options. Another option may be increase the pre-bonus GFAR.
	Framework - true incentive	Careful economic analysis and detailed neighbourhood-based needs assessments should be undertaken to support the viability of integrating affordable housing into new projects over a certain scale. Consider alternative approaches for density bonussing wherein the developer sees enough value creation to be incentivized to build the additional units.	Change not recommended — in an area of 33 square kilometers there is a benefit to reduced rent levels throughout all communities. The Centre Plan is taking a values based approach to ensuring reduced rent opportunities are available in all communities.
	Framework - value areas	Investigate the implications of the proposed density bonussing requirements on a site by site basis to better understand the broader implications. Undertake this process in a collaborative partnership with the Municipality, industry and CMHC, to identify necessary refinements, and make this analysis available to the public to clarify the process and requirements.	More discussion needed – staff are investigating the Density Bonusing program as defined and will do additional analysis to test the framework against these inputs.
	Negative impacts - growth and supply	The proposed program will lead to less affordable housing than hoped, as most developers will choose not to bonus and instead develop only low-rise buildings of 6 floors or less. This will waste development and population capacities in Corridors and Centres, and HRM will not meet its urban core growth targets or be able to provide substantial amounts of affordable housing.	Change not recommended — with refinements to the program it will be assured that development will take place using the incentives provided through increased GFAR on the site.
	Expand Areas / GFAR	Lower the bonus GFAR threshold from 3.5 to 2.5.	More discussion needed – there is an opportunity to reassess the bonusing framework to spread the impact across more developments. A different pre-bonus threshold may be warranted for Centres, vs. Corridors and HOR sites.
	Expand Areas / GFAR	Generate more community benefit across a much greater number of sites by using a threshold of units rather than a GFAR of 3.5. As an example, the base pre-bonus threshold could be set at 24 units, regardless of height. If you wish to exceed that scale of building, regardless of height, then you must provide affordable housing at a certain rate, such as 1 affordable unit per 10 units. The Provincial requirement for accessible units is an example which requires 1 per 20 units.	Change not recommended — there is an opportunity to reassess the bonusing framework to spread the impact across more developments. The proposed system uses GFAR thresholds rather than locking owners into any particular number of units.
	Negative impacts - rents	Provide more affordable housing by using older stock of apartments with a significantly less average cost of 900-1000 per month rather than new building prices of 1900-2100 per month. Using new building prices will result in higher priced units as the developer will offload the cost of bonussing to the residents. The city could provide twice as much affordable housing with a better approach.	Change recommended — Existing stock will continue to be more affordable than new builds, but there is a value in having mixed communities of affordability in new buildings.
	Negative impacts - tax	Charge a fair and clearly-stated per-unit tax for all new housing that is then directed to rent subsidies and capital grants for new construction through a rational and coordinated program involving other levels of government and non-profit agencies. The burden would then be spread across all development forms and enable a stronger program that can actually achieve its goals.	More discussion needed – there is an opportunity to reassess the bonusing framework to spread the impact across more developments. It is unlikely that we introduce a new per-unit tax.
Framework – FGN Sites	Do not assign density bonussing to Future Growth Nodes. As comprehensive developments they provide community amenities through the CDD.	More discussion needed – not all amenities can be achieved through the CDD process, some amenities may be best achieved through a bonusing system. If all amenities that would be resultant from a Density Bonusing program can be achieved to the same quality through the CDD process we can entertain this approach.	

Theme	Sub-theme	Comment	Response
6.2 Affordable Housing Sources: Letter - COM, Workshop - COM, Letter - IND, Workshop - IND, SYC, Letter - Public, Social Media	Affordability period	The minimum affordability period (15 years) is too short. It is unsuitable for families and simply postpones the problem. “Permanent” units could be managed by a non-profit entity and leveraged to create more units in the future.	Change recommended — Options: <ul style="list-style-type: none"> - Extend timeframe to 20 years - Perpetuity - Cash
	Surplus municipal land	HRM’s surplus municipal lands are an ideal way to augment Halifax’s affordable housing stock, and this use should be considered first before any further disposition efforts — at least until HRM achieves its affordable housing target. Before selling its land, HRM could impose a covenant that requires a certain amount of affordable housing. Proceeds from land sales should be used to develop affordable housing, too.	Change recommended — Policy support for use of municipal land exists to leverage other investments. Other options may include: <ul style="list-style-type: none"> - May require changes to AO50. - May require setting up an additional fund earmarked for affordable housing from the sale of lands. Staff are currently preparing a workplan to respond to Housing and Homelessness Partnership Affordable Housing Targets endorsed by Regional Council in 2016.
	Affordable housing policy	In anticipation of forthcoming federal funding, HRM should adopt a much stronger and more prescriptive approach to preserving and constructing affordable housing, including a requirement to replace any rental units lost during redevelopment. Key sites — such as larger properties and sites near amenities, schools, and transit stations — should be identified, prioritized, and incentivized for affordable housing construction and partnerships. Rent control should be considered.	Discussion needed. Would require changes to the HRM Charter to control tenure and rent control. The incorporation of reduced rent units can to some extent mitigate the loss of affordable units.
		Provide incentives for the creation of affordable housing other than density bonusing being achieved through direct contribution by the developer.	Change recommended — we currently have building permit fee waivers for non-profits providing affordable housing. New Housing Strategy implemented via CMHC will also provide incentives for affordable housing. <p>Staff are currently preparing a workplan to respond to Housing and Homelessness Partnership Affordable Housing Targets endorsed by Regional Council in 2016.</p>
	Requirement to provide affordable housing/ inclusive zoning	There should be a requirement, separate from that attached to density bonusing, for developers to construct a certain number/percentage of affordable housing units in new developments.	Discussion needed. Would require changes to the HRM Charter to enable inclusionary zoning. Council requested this authority in 2016.
	As a density bonusing benefit	The affordable housing public benefit should be permitted to be built off-site (but within the same community), and/or HRM should be willing to accept cash-in-lieu and establish an affordable housing trust.	Change recommended — Option exists through cash-in-lieu. Units in another buildings needs discussion. Need to maintain proximity to development, at a minimum Regional Centre.
	Definition	In a new building, even a 40% rent discount is not really “affordable”.	Discussion needed. The discount is from HRM average market rents. Council provided direction in 2016 to target low to moderate income households, not those in core housing need.
	Unit types	Housing Nova Scotia wants smaller units built, while the draft Centre Plan requires units of similar size to the rest of those in the development.	Discussion needed. Currently program would accept 1 bedroom or larger units. Studio/bachelors may be warranted.
	Monitoring	While the densification encouraged by Centre Plan is desirable, the Regional Centre’s increasing attractiveness carries a risk of pricing lower-income individuals out of the market. A well-defined monitoring plan is needed, as well as controls for ensuring affordable housing supply.	Change recommended — Policy support for monitoring exists.
Other forms of affordable housing	The need for more affordable housing in HRM is acute. It is a positive step to remove impediments to backyard/secondary suites, rooming houses, and supportive housing, but more can be done to encourage these (e.g., waiving fees, streamlining approvals). Also, revisit definitions and policies to ensure they do not perpetuate past stigmas.	Change recommended — Staff feel that the proposed Plan and LUB provide for diverse forms of housing and help eliminate stigma in current documents.	

	Costs of development	Development and other fees are passed onto tenants, as are the costs of meeting any other requirements (such as built form, design, etc.). Be careful when imposing too many requirements that may be antithetical to affordability.	Change recommended — Cumulative impacts of fees needs to be monitored but the goal of the Plan is to improve quality of developments and costs of development are either borne by individual developments, or tax payers at large.
	Supply and demand	In general, ensuring a good supply of housing, sufficient to meet demand, is key to keeping prices down.	Change recommended — Centre Plan is increasing supply in strategic locations.
		Consider allowing residents living 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 of the initial household income limit.	More discussion needed – could be included as part of the monitoring defined in the Density Bonusing Agreement.
	Future Growth Nodes	Provide greater detail in policy respecting how density bonusing will be used in the Future Growth Node context and how pre-bonus/post-bonus thresholds will be established.	Change recommended — Policy can provide a greater detail.

Theme Sources	Sub-Theme	Comment	Response
6.3 Other Public Benefits Workshop - IND, Letter - IND, Workshop - COM, Letter - COM, SYC	Community benefits - public art	To begin investing in, and developing, a substantial public gallery of art, require 1% of capital construction costs to be allocated to public art on all projects over a certain scale.	More discussion needed – this is not a program that has been contemplated.
		<ul style="list-style-type: none"> Remove public art as a benefit option because it becomes more of a benefit for the developer than the public. Fund public art in other ways.	Change not recommended — all benefits from the bonusing program will be publicly accessible.
		Establish a small, council-endorsed group of curators to endorsing locations for public art, artists, and pieces.	Change recommended — we have a public art policy that includes details on jury and selection. We could tighten the link to this policy in the draft SMPS & LUB for art over a certain amount.
	Community benefits - add food systems	Include the following to the list of eligible density bonusing choices: <ul style="list-style-type: none"> community gardens, greenhouses, and community kitchens. street improvements including rerouting, traffic calming measures and bike lane development streetscape improvements contributions to public transit initiatives or elements 	Change not recommended — the garden & kitchen options fit within the definitions of the Draft Density Bonusing program (public accessible open space, community space). The street improvements and transit improvements can't be funded through the Density Bonusing tool as they are off-site.
	Community benefits - area needs	Garner local support for density bonusing by linking Bonusing to Local Amenities. Achieve this by establishing a process where the immediate community is consulted on what they would want (for the non-affordable housing portion) of the density bonus and negotiate with the developer in this respect.	Change recommended — we can add this to the Public Consultation program for individual projects through site plana approval.
	Community benefits - art & streetscaping	Enable additional Art/streetscaping outside of a density bonusing projects.	Out of scope – we are not able to procure right of way improvements through the SMPS & land use by-law.
	Community benefits - cash	Increase affordable housing availability by using open process, cash-in-lieu program that direct the funds into non-profit housing.	More discussion needed – cash in lieu can leverage other investments but would require the development of new program.
		Introduce a 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 that a Committee of Council to manage.	Change not recommended — preference for Density Bonusing program is to procure amenities on site, where cash in lieu is collected it will be for uses across the Regional Centre.
Community benefits - culture & heritage	Allocate 50% of density bonussing funds to affordable housing with the remainder divided equally between cultural infrastructure, public art and green space.	More discussion needed – there is an opportunity to reassess the bonusing framework to spread the impact across more developments. Reduced allocation to	

			housing may make the program less effective, if other changes to the framework are introduced.
	Community benefits - Parks & open space	<p>Include the following to the list of eligible density bonusing choices:</p> <ul style="list-style-type: none"> • public park or green space development; e.g., parkette within 500 m of site. • Public playground development 	Change not recommended - The park improvements can't be funded through the Density Bonusing tool as they are off-site.
		Allocate 25% of density bonusing funds for Park purposes.	Change not recommended — Currently 25% of amenities can be something other than Affordable Housing. This could be for public accessible open spaces.
		Consider amending, or adding, criteria with respect to the quality and the character of publicly accessible amenity space.	Change recommended — Criteria under section 200 of the draft Land Use Bylaw can be reviewed.

7.Land Use

CDAC Comment

Theme	Sub-Theme	Comment	Response
7.1 Land Use - Permissions Sources: Letter - COM, Letter - IND, SYC, Workshop - IND, Workshop - COM Letter - COM, Workshop - COM, Letter - IND, Letter - POL, SYC, Letter - Public, Letter - RES, Workshop - Landscaping	Unit Types	Incentives should be put in place to enable additional larger sized units at an affordable price point to ensure access to multi-unit housing for families.	Change not recommended — Staff believe that incentives are better directed at reduced rent affordable units, and allowing the market to cater to local housing needs and changing sizes of families.
	Affordability	The only MPS comment related to affordable housing in the FGN's 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.	Change not recommended — Density bonusing was envisioned to be applied to FGNS, along with a zones that permit a broad range of housing options.
	Supportive Housing	Supportive housing should not be a planning issue, why do we need to single it out through zoning?	More discussion needed – an exclusion of the term would risk the exclusion of shared forms of housing that do not meet the definition of a dwelling unit. The intent behind the definition is to permit supportive and shared forms of housing.
	Food Security	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).	Change not recommended — Centre Plan permits a wide range of local commercial and grocery stores. The LUB limits drive-throughs.
	Cannabis/Alcohol retail	To protect children and youth, we encourage the city to look for opportunities within Centre Plan Package A to determine where alcohol and cannabis establishments can and cannot be permitted.	Out of scope – These are retail uses licensed by the Province.
	Urban Agriculture	<ol style="list-style-type: none"> The limitation to one bee hive for properties smaller than 2,000 square metres is too restrictive. HRM staff should consult with the Halifax Honeybee Society to determine the ideal number of bee hives that should be allowed on properties. The keeping of chickens should be allowed in the Centres, Corridors, and Higher-Order Residential zones. 	Change recommended — A minimum of 2 beehives may be required and the LUB can be amended to reflect this. If permitted in low density dwellings in Package B areas, chickens could be permitted in low density dwellings in Package A areas.
	Community Specific Policy/Land Use	<ol style="list-style-type: none"> The details ignore Dartmouth and need to be replaced or scaled to recognize Dartmouth. Dartmouth commercial \$80-240/sqm economic range, need for parking spaces, “Strip Pattern” instead of a “Grid Pattern” for our Corridors – Automobile oriented, allowing for expansion and renovation for existing uses (not just grandfathering, but growth oriented), add Broadcast use to all zones (this is federal jurisdiction and cannot be restricted by Municipality), remove Pawn Shop from permitted uses at Grahams Corner – highlights the need to custom differentiate character and strengths for each Corridor, and ensure Wholesale and Auto Repair are permitted for Graham’s Corner anchor tenants. 	Change not recommended — Policies, regulations and Design Guidelines did consider the Dartmouth context. Dartmouth s changing and can support good urban design. The strip patterns and auto-oriented development is not supported by the Plan. Graham’s Corner is a Corridor can be further evaluated for local area character but the intent is not to add multiple new zones. Staff do not believe that auto oriented uses in Corridors do not support pedestrian oriented uses but staff will consider it in the Dartmouth context.
	Corridor Land Uses	Pleasant Street as a Corridor will create a thoroughfare. This makes it challenging to also be a neighbourhood. We would suggest a change to will equally encourage new development that is residential in nature not residential and commercial together. Planning rules and GFAR values should therefor encourage some infill that is residential only allowing developers to add buildings with fewer floors.	Change not recommended — a Corridor designation does require retail uses on the ground floor if the street is not designated as Pedestrian Oriented Commercial Street. Ground floor height requirements are intended to encourage a transition to more commercial uses.
		From the Neighbourhood Design Guidelines for the Shannon Park Lands, Part 1.2(b) (Neighbourhood Form), should provide for employment uses including office, commercial service, professional service and a range of commercial uses in addition to “local commercial” use. Commercial and employment uses have been identified as being appropriate adjacent to the bridge/Hwy.111 as well as adjacent to the existing CN rail right-of-way. Commercial and employment uses, as well as high density residential forms, in these areas can assist in transitioning from the adjacent non-residential uses/areas to the residential neighbourhood identified for the interior of the site.	More discussion Needed - Staff will evaluate additional uses against the overall intent of the Plan.
	CEN-1 Uses	Office uses should be permitted in Cen-1, in consideration built form limits it would stay in scale with the Cen-1 neighbourhood.	Change recommended - Staff are reassessing the uses for each designation.
	We have great concerns with the proposed list of permitted uses in the CEN-1 zone proposed for the south’s side of Yale. These proposed uses are not suitable: (1) up to 12 apt. units; (2) drinking establishments; (3) restaurants; (4) fabrication uses; (5) local commercial uses; (6) personal services uses; (7) wholesale food production; (8) club recreation uses; and (9) community recreation uses. The above uses overtly encourage the rapid elimination of our	More discussion needed – The intent of CEN-1 is to transition from the Higher intensity CEN-2 to other less intense zones and range of uses. Staff are reassessing the uses for each designation.	

		existing or future lower density residential uses on the south side of Yale in favour of commercial uses, and also will dramatically impact the quiet enjoyment of residential properties on the north side of the street. Uses such as single unit, two-unit, townhouses and similar uses are appropriate for Cen-1.	
	Mixed use	The Centre Plan SMPS and LUB do not specifically state that stand-alone commercial buildings are not permitted in the HR zones. A developer has commented that it appears that commercial-only buildings can therefore be built in HR zones. Add language that ensures that in a mixed use building the residential use is the dominant use and limit any commercial use floor area to the lower two storeys and no greater than a maximum of 33% of the total floor area of the building (similar to section 60 in language). Also, state that all buildings in HR zones must include residential uses.	Change recommended — Respecting HR, staff will be evaluating the standards to ensure that residential will be the dominant use in each building.
	Commercial uses	Enable small scale, neighbourhood oriented self-storage facilities. There is growing demand for this use at the neighbourhood level and it can be provided within a mixed-use building without negative visual impacts, as opposed to the larger-scaled business park type storage facility that is typically seen.	Change not recommended — This use has been appropriately provided for in Package B and is not appropriate in or immediately adjacent areas permitting residential uses.
	Food production	Wholesale Food Production Use should include the processing of animals and butcher shops as two exist in the Centre areas in the North End.	Change not recommended — We have allowed for butcher shops in the regional centre to support local access to meat products, however, commercial scale processing of animals is not permitted or supported.
	Food	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.	Change recommended — a broad definition was always the intent; staff will review the definition.
	Emergency Shelters	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.	Change not recommended — while tenures vary, the intent is for emergency shelters to provide short-term accommodation. Staff may tweak the definition but it is important to retain this definition to permit the use.
	Supportive Housing	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.	More discussion needed — staff are still completing a separate review of supportive and shared housing uses in HRM. Centre Plan will incorporate the results when they are available.
	Local Commercial	Definition of “Local Commercial” should be changed/clarified so that office and fitness centres, yoga studios, and other small scale uses are included.	Change recommended — Provided that size constraints continue to apply, a wider range of local commercial uses would be appropriate in residential neighbourhoods.

8. Development Review Process

CDAC Comment

Theme	Sub-Theme	Comment	Response	
8.1 Planning Application Review & Processing Letter - COM, Letter - IND, Letter - Public, SYC, Letter - POL, Letter - RES, Workshop - IND, Workshop - COM	Site Plan Appeals	As written, appeals can be received on all matters related to the development, not just design aspects. The number of appeals could be a heavy responsibility for community councils.	<p>Change recommended — Staff will continue to refine how appeals are addressed in the draft documents. To reduce the number of appeals, the Land Use By-law may specify matters that are not subject to appeal. Moreover, in the draft documents, only property owners within 30 metres are notified and permitted to appeal.</p> <p>In the absence of Regional Centre Community Council, appeals may have to be heard by a joint meetings of the Halifax and West and Harbour East Marine Drive Community Councils to ensure consistent decisions.</p>	
	Approval timelines	Can smaller projects be approved in less than 60 days? Carrying debt is very expensive for small developers.	Change recommended — Smaller projects are exempt from site plan approval.	
	Approval Process	<p>There is a concern that Site Plan Approval, while an improvement over the Development Agreement Process, is still too onerous as nearly every project in the Regional Centre Package “A” area will need to go through this.</p> <p>There is a desire for some development to proceed through an as-of-right process, especially in the lower density areas of Package “A”.</p>	Change recommended — While small projects in Package A areas are already exempt from Site Plan Approval, the current documents do not specify two tiers of Site Plan Approval (e.g., non-substantive and substantive). Staff will explore ways to exempt smaller projects from the full Site Plan Approval process.	
	Site Plan Exemptions	The 1,000-square-metre figure provided as the limit for exemptions for SPA was questioned in comments throughout.	More discussion needed — 1,000 square metres is roughly a four-storey building. Staff will explore whether it is appropriate to exclude even larger buildings from the design oversight of Site Plan Approval.	
	Pre-application	There is a concern that too much detail is required at pre-application. The industry feedback that it is difficult to remain open to large changes in design if they’ve had to spend time and money completing the design just to get to the pre-application stage.	Change recommended — Staff will refine the application submission requirements. Simplified preliminary submission requirements will need to be balanced with enough detail to identify relaxations.	
	Design Review Committee		The Design Review Committee requires an overhaul, such as removing approval authority and recruiting academics.	Change recommended — The draft Land Use By-law has proposed some changes to the DRC’s terms of reference, but further refinements are required. Staff support a change in the committee’s role from approval to advisory. Staff can work to recruit members from the academic sector.
			Recruit designers from out of town and reimbursing members for their time.	More discussion needed - Council may consider this, but this will have budget implications
	1 Hectare lots	<p>The assembly of 1 hectare lots prior to adoption may be unnecessarily onerous. A desire to include contiguous properties under common ownership was suggested. Regarding lot size on adoption, there was additional concern about interim rights on large parcels prior to a Development Agreement.</p> <p>It was suggested that the draft policy is not clear if the DA process would allow projects to be exempt from also needing site plan approval or quantitative aspects of the Land Use By-Law.</p> <p>Finally, it was suggested that the heights map be altered to not suggest a height for any 1 hectare lot that is currently in existence.</p>	<p>Change recommended — The intention of the one-hectare lot policy was to discourage assembly while enabling comprehensive planning. Staff can refine the policy to improve its flexibility.</p> <p>Considerations include:</p> <ol style="list-style-type: none"> 1. Degree of flexibility in built form regulations beyond density 2. As-of-right options (e.g., modest expansion of current uses) 3. Whether to map heights on one-hectare sites 4. How to accommodate new infrastructure (if needed), e.g., necessary reviews and criteria for connectivity 5. Criteria for plan amendments for future assemblies and consideration by DA. 	

9. Implementation

CDAC Comment

Theme	Sub-Theme	Comment	Response
9.1 Implementation Sources: SYC, Letter - COM, Workshop - COM, Letter - IND, Workshop - IND, Letter - Public, Workshop - Landscaping	Plan review	Require a five-year review with interim reviews.	Change recommended — the review period will be updated in policy through the next review.
	Infrastructure / Services	For a complete streets approach, 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.	Change recommended — this is part of implementation of the IMP, the Centre Plan will not introduce a classification.
		Require Infrastructure Plans within HRM divisions to align with anticipated redevelopment areas. Incentivize development in areas that have infrastructure capacity.	Change recommended — HRM needs to be coordinated to support and incentivize growth.
		Make sure that there is adequate fire, emergency services including staffing levels for areas that are being considered for high density living areas.	More discussion needed – Staff will ensure Fire Services is aware of the potential changes to population density & distribution in the Region.
		Reconnecting the street grids of the FGN are crucial and must be executed fully and properly.	Change recommended - policy support exists in the Plan for this.
	Public Amenity/Recreation	<ol style="list-style-type: none"> How will the Centre Plan will be implemented to align with other 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. We need a map showing where new parks are wanted, even if it's general. While the number of housing units within 400m of a public park will be tracked, the plan does not identify any targets. Enable opportunities for public art and streetscaping at as percentage of costs, like HRM capital projects, and put money into a pool, that could be used for art hubs, maker spaces. 	Change recommended - HRM needs to be more coordinated on this aspect and staff will explore options to strengthen policy with other business units.
	Community land trusts	Are there plans for Community Land trusts?	The Plan does not prevent the creation of community land trusts.
Staff / Process	Hire a city architect and reduce the reliance on design review. This will speed things up, and reduce the number of decisions that can be appealed to council.	Change not recommended — a variety of opinions strengthens the quality of decision making. New staff, or single point of contact, may not resolve the issue of appeals.	

Theme	Sub-Theme	Comment	Response
9.2 Mobility Sources: Letter - COM, Workshop - COM, Letter - IND, Letter - Public, SYC	Congestion	Many main streets in the Regional Centre are already quite congested, so won't adding more people simply exacerbate this congestion? Can HRM look at other ways to encourage people to abandon their single-occupancy vehicles? Increasing traffic works at cross-purposes with trying to become "pedestrian-first".	Change not recommended – This will be addressed by the IMP.
	Parking	Every new unit should have a parking spot so that there is no spillover into surrounding areas.	Change not recommended — Sites identified for strategic growth are aligned with transit service. Parking requirements are antithetical to affordability.
	Future Growth Nodes	<p>The transit hub should be the first item considered when planning a Future Growth Node. Centre Plan should include a more specific policy requiring a transit hub's location to integrate with the broader transportation network.</p> <p>Also, more consultation is needed before requiring a transit hub as a mandatory component of every Future Growth Node.</p>	More discussion needed — Each FGN is unique. All FGNs will be required to place priority on transit, but the level of service will depend on density. Draft policy supports integration with the development. Three have detailed

			design guidelines, and more consultation will be needed for the remaining three.
	Transportation Reserve	Include a “Transportation Reserve” zone to help implement strategic projects such as those supporting transit and active transportation infrastructure.	Change recommended — Zone is created for Package B.
	Transit	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, the City should explore incentives that will encourage these uses to locate near transit and amenities.	Change recommended — the intent of the Plan is to permit these uses broadly within Package A areas, as well as Package B areas. The proposed regulations enable but not require these uses to be located on transit routes as this could limit location choices.
	Active transportation	Policy 96: Ensure that the policy improves the safety and convenience of active transportation options by changing Policy 96 to include a “shall continue to improve” clause instead of “may”.	Change recommended — Staff is open to replacing the language to a “shall” with the understanding that a municipal planning strategy cannot commit Council to a budgetary decision.
	Transportation	Policy 97: Reword policy to ensure the Municipality continues to assess traffic situations and engages with the community to find solutions where problems are identified.	Change recommended — Staff is open to replacing the language to a “shall” with the understanding that it will be implemented through other programs and not the Land Use By-law.
	Transit	Policy 99: Ensure that the Municipality considers the Urban Structure Map when updating the Transit Priority Plan by changing Policy 99 to include a “shall consider” clause instead of “may consider” and clarify what is meant by “Transit Priority Plan”.	Change recommended — Staff is open to replacing the language to a “shall” with the understanding that it will be implemented through other programs and not the Land Use By-law.
		Introduce policy supporting the commuter rail in the Regional Centre	Out of scope. This is an issue for regional consideration.
	Mobility	Incorporate cross-referencing into the Plan, particularly respecting the policies of the IMP, because the Integrated Mobility Plan identifies the integration of land use planning with transit planning, as a key pillar. Provide direct references to the Complete Streets policies in the Integrated Mobility Plan.	Change recommended — The plan will provide additional cross-referencing.

Theme	Sub-Theme	Comment	Response
9.3 Parks and Open Space Sources: SYC, Letter - COM, Workshop - COM, Letter - Public, Workshop - Landscaping, Letter - IND, Workshop - IND	Tree preservation	Require multi-unit developments to preserve existing green spaces, require naturalized areas, landscaped buffers, pocket parks, public art, and plazas, and consider existing vegetation on and around development sites.	Change recommended — The Plan provides for preservation of existing and new plantings through landscape standards and, amenity space in the draft Land Use Bylaw. Other items mentioned are addressed through density bonus standards.
	Park/Green Space	Policy 105: To ensure new populations have excellent access to open space, a process must be created in policy to ensure that the open space framework is tied to densification and creating complete communities. An open space network is identified as desired in Policy 105, however, one is not proposed nor is there an outlined process to achieve one.	More discussion needed — This may be better addressed in the Green Network Plan. The Municipality needs to coordinate investments in open space with density.
		Street tree requirements should be a part of the plan and development process	Out of Scope - HRM land use bylaws do not regulate development within the street right-of-way. Street trees on existing streets are under the jurisdiction of Transportation and Public Works and their respective standards, and trees on new streets are addressed through the subdivision process and related standards.
		Protect existing parks and open spaces (e.g. Halifax Common) and increase the overall amount and variety of green space in the Regional Centre. Does HRM have a plan to buy parkland in the Regional Centre?	Out of Scope - Parks and Open Space will be addressed in Package B.

		Indicate on a map where new parks are wanted, even in a general manner, in particular on municipally owned lands such as St. Patrick's High School, Bloomfield. Make explicit and strengthen connections between the Centre Plan and the anticipated Green Network Plan.	More discussion needed - HRM needs to be more coordinated and staff will explore options to strengthen policy with other business units. Connections to draft Green Network Plan can be strengthened once the GNP is released.
		Prepare and embed a detailed parks, open space and city ecology plan into Centre Plan's policies, by-laws and design guidelines.	Out of scope. While the Plan can provide more support for comprehensive open space planning, this level of detail is beyond the scope of the Plan.
		Future Growth Nodes should require generous parks and open space areas	Change recommended — In general, a minimum 10% parkland dedication is a requirement for subdivision. Additional parkland may be required under the development agreement process.
		More walkways and bikeway needed; include planned street and active transportation investments in Policy 98 (e.g. Penhorn Transit Terminal to Penhorn Lake; True North Cresc. in Dartmouth North).	Change recommended — These elements will be considered in review policy respecting development agreements for future growth nodes.
		Ensure that yards are landscaped, and not used for parking	Change not recommended — The Draft Land Use Bylaw is proposing reductions in parking requirements which will enable reduced paved surfaces.
	Shadow on Parks & Public Spaces	Policy 64 (shadow on certain parks) needs to be simplified; in Policy 64 ensure that no development will cast a permanent shadow on a park or along any sidewalk. HRM staff should develop a more robust criteria.	Change not recommended — Detailed standards respecting shadows have been established to enable development and support the public realm adjacent to streetwalls. In addition, upper-storey stepbacks and maximum tower dimensions are being proposed to create narrower shadows with shorter durations on adjacent properties, including parks.

Code	Theme	Sources	Sub-Theme	Comment	Response
9.4	Sustainability		Building efficiency	Remove the requirement for a 1.5 m stepback above the streetwall for low-rise building. It ignores all structural engineering and cost of construction rules.	Change recommended — Staff are considering removing the stepbacks for buildings below 14 m.
		Sources: Letter - IND, Workshop - IND, Letter - COM, Workshop - COM, Letter - Public, SYC	Change needed to Green / Sustainable building and community features	Introduce 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. Policy 103 is limited in scope. <ul style="list-style-type: none"> Strengthen the language in the plan respecting the promotion of sustainable building and site design practices. Develop a specific policy on this topic and introduce core concepts within the LUB / Design Guidelines. Provide greater detail outlining the role the municipality expects to play in advancing more sustainable design. 	Change recommended — Achieved under Policy 103. District energy can only be required in Cogswell under recent Charter amendments. Change not recommended — Staff believe the policy is broad in scope.
			Climate Change	Introduce policies related to managing impacts on infrastructure and planning for increasing water levels, as a result of rising sea levels, must be added and implications must be considered for new developments and infrastructure investments.	Change recommended — The draft materials have watercourse and coastal area requirements. The Regional Plan direction is implemented through the Draft LUB.
			Water Run-off	Revise policy respecting run-off and the importance of creating porous surfaces as a part of all new development, to be consistent with the Urban Forest Master Plan. Proposal: Provide incentives, in the form of fee reductions, should be provided for developments that limit non-porous surfaces.	Change not recommended — Halifax Water has a sliding scale of stormwater fees based on performance of new development.
			Energy	Provide greater detailed requirements for Community Renewable Energy Plans.	Out of scope.

	Lakes	<p>The Regional Plan does not provide sufficient management or protection of urban lakes. Re-instate Policy 2.7.2. (f) of the Purple Document into the Centre Plan.</p> <p>Policy (f) states: Monitor water quality in all lakes and develop recommendations to maintain water quality, recreational opportunities, and aquatic habitat.</p>	<p>Change recommended — Urban lakes in the Regional Centre are a valuable resource. The policy can add a provision to support lake monitoring which will have operational implications.</p>
		<p>Introduce a policy statement for establishing a pilot project for the management of our urban lakes, starting with those in the Regional Centre.</p>	<p>Change recommended — Policy can support partnership opportunities to implement the goals of the plan.</p>

10. Other Issues

CDAC Comment

Theme	Sub-Theme	Comment	Response
10.1 Consultation Process Letter - COM, SYC, Workshop - COM, Letter - IND, Workshop - IND, Letter - Public	Scale of Consultation	There was some concern that the consultation was not specific enough to local areas, and that the Open Houses did not provide enough opportunity for the public to speak about local concerns in a public forum.	Change not recommended — Opportunities for public input were extensive and varied and will be further itemized in the “What We Heard” report.
	Consultation on Eventual Development / Site Plan Approval	There were questions as to the utility of a public meeting for developments that are proceeding under Site Plan Approval as the development rights are controlled under the Land Use By-Law and there is no mechanism to refuse a permit based on community input.	More discussion needed — The purpose of public meetings is to influence design and potentially public benefits. Staff recognize that for smaller projects this may be onerous and there may be an opportunity to exempt those projects from public meetings.

Theme	Sub-Theme	Comment	Response
10.2 Package B Social Media, Letter - Public, Letter - IND, SYC, Letter - COM	Backyard Suites	The height maximum for backyard suites needs to be enough to accommodate a minimum inside floor-to-ceiling clearance of 8 feet for two habitable storeys, 19 feet minimum overall for the building.	Change recommended — Staff will be reviewing the standards for this use.