

Regional Centre Secondary Municipal Planning Strategy Package A Review, Halifax

May 4th, 2018

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Introduction

A REGIONAL CENTRE SECONDARY Plan review is a once in a generation opportunity to reset the vision and align policies to deliver on that vision. The stakes are high in terms of getting it right. The land economics of a region are tied to, although not only determined by, land use planning policy. Market realities ebb and flow as interest rates, or government incentives for affordable housing, wax and wane. A complex web of variables come together to generate, in just the right conditions, outcomes that are consistent with a clear vision.

History has shown that reactionary frameworks can stifle growth and ones that are too permissive can result in regretful outcomes that are impossible to undo. Overdevelopment that compromises quality of life or the natural systems required for people to flourish in the Regional Centre is not in the public interest. But underdevelopment is not in the public interest, either. A critical mass of people and uses are required to deliver walkable scaled communities, where it is possible to shop for groceries, on foot, within close proximity to home. Without density, without a concentration of people to frequent the shops and cafes and other amenities needed for daily life, it becomes necessary to drive. The draft Plan acknowledges this at the outset: ‘enabling more people to walk, cycle, and take transit and use other sustainable modes of transportation requires rethinking not only the design of our transportation system, but also the redesign of our communities.’

The question is this: does this plan deliver the growth framework and density necessary to create a liveable city?

The review is presented in four parts.

Overview and Strategic Considerations outlines the approach to the review, and identifies a series of strategic considerations that underpin the plan and warrant reconsideration. **Foundational Issues** outlines a series of broad themes that are the foundation upon which the more detailed work rests. In this section, I raise some observations and concerns that are central to the overall integrity of the planning framework. **Secondary Plan Content** review is a section by section analysis of the content within the Secondary Plan. **The Land Use By Law Review** is a high level commentary on the technical and detailed Land Use Bylaw, and it reads less like a narrative than the other sections, and more like a list of considerations. References to the Design Manual are made throughout.

I. OVERVIEW AND STRATEGIC CONSIDERATIONS

A1. Key Objective and Process of the Review

The intent of this review is provide a constructive contribution to the work undertaken by HRM Planning and Development, Halifax, as represented in the public materials released in three parts in April of 2018 for comment. The aim, on the part of the Municipality, is to make refinements to the policy framework following a public comment period. While this review has been commissioned by the Urban Development Institute of Nova Scotia, in partnership with Waterfront Development, the Downtown Halifax Business Commission, and the Halifax Chamber of Commerce, it has also been undertaken in co-operation with a broad array of technical stakeholders who were interviewed to provide contextual input, and some of whom submitted written comments (a full list of stakeholders consulted is provided in Appendix A). However, the comments herein are my own, and are humbly presented to solely advance the public interest in designing and building a liveable city, in Halifax.

Methodology

This is an independent, professional technical review, and may or may not represent the views of the sponsoring agencies.

While not a subject matter expert in the Halifax context, I have extensive urban design and policy planning experience in HRM having acted as the lead engagement and policy consultant as a partner in the firm Office for Urbanism developing HRMbyDesign from 2005 to 2008. I was also the Keynote Speaker at the Art of City Building Conference in Halifax in October 2017. To inform this review, I undertook tours and conducted stakeholder consultations with technical experts on two separate occasions in recent months. In addition, I have had detailed conversations with the authors of the Regional Centre Plan, prominent and small scale developers, a number of engineering, planning and design consultants, representatives of non-for-profit organizations, and other related individuals and companies. In the absence of a Steering Committee for this short study,

I requested the creation of a Leaders Table that included the following individuals, whom I met with on three occasions:

- MP Andy Fillmore
- Mr. Robert Richardson
- Mr. Louie Lawen
- Ms. Kelly Denty
- Mr. Steve Higgins

A2. Review of Document Structure

The overall document has a strong and coherent structure that ensures it is easy to navigate. However, the logic behind the level of detail in various parts of the document is unclear. For example, little meaningful description or analysis is provided with respect to the character of the Centres and Corridors, and yet significant time is dedicated to a detailed and prescriptive policy framework for designing individual building's bicycle amenities area.

In addition, there are a series of themes that warrant extrapolation throughout the document. It is easy to lose sight of the vision given that it is not reiterated or expanded throughout the various sections of the document. For example, while 'complete communities' are identified as a goal of the Plan, there is no connection made in the Heritage and Culture Section, or in the Mobility section, with respect to how the proposed policy framework in these sections both links to and delivers on creating 'complete communities'. And yet, a central foundation of the Integrated Mobility Plan is the need to design complete communities where residents have more choice with respect to their mobility needs. Complete Streets, and Transportation Demand Management, are fundamentally entwined with land use planning and design, and yet the linkages in the Regional Centre Plan are not made.

There is a strong emphasis on urban design and built form measures, but little emphasis on the broader livability objectives and framework. The Regional Centre Plan should seek to create distinct places with

clear cultural, heritage and design features that are unique to any given centre or corridor, and yet the emphasis in the framework is less on the character of overall areas and is mostly weighted to the design of specific buildings. The one, and important, exception relates to Heritage Conservation Districts. Advancing these districts as a key priority is an essential first step to ensuring the uniqueness of the Regional Centre is reinforced as it changes, evolves and accommodates additional growth.

A3. Mitigating Unintended Consequences

There are tensions with respect to the level of detail that ought to be included in a planning policy framework. It's clear that in preparing this draft for public review, city planners struggled to find the right balance – as planners always do. On the one hand, the city and residents and to some extent developers would like certainty, and the proposed framework seeks to eliminate the discretionary nature of current approvals in favour of a more predictable, streamlined process that is shaped through better definitions related to use, built form, and development yield. More certainty is also seen as a key means of dampening land speculation, which unnecessarily drives up costs. On the other hand, in an infill context, every site is subject to contextual factors that are limiting and unique – adjacent heritage assets, slope conditions, irregular lot depths and widths. It is difficult to create a framework that both establishes the intent of development review moving forward while also rigidly prescribing outcomes on a site by site basis, without a site by site analysis. Certainty cannot be achieved in broad strokes. It can only be achieved through an analysis that is granular and place specific – a level of detail that does not underpin this Plan. The risk of creating a framework that is prescriptive and yet broadly applied is that every site tends to require exceptions, which in turn means the planning approach once again becomes ad hoc and loses the certainty that was the objective at the outset.

This is a tension that will be apparent in the analysis that follows. By applying a detailed policy framework broadly, unintended outcomes will result. Some sites may be downzoned as a result of the application

of the Design Manual: was this the intent? Larger developments will be easier to execute than smaller projects, as the burden of the guidelines as proposed with respect to affordable housing, for example, may be challenging to absorb on smaller projects. Again, was this the intent? It will be essential to have more clarity with respect to the intent of the policy framework and the guiding principles to which new development ought to adhere to ensure that proposed projects are in keeping with a larger vision for the Centre as a dense, walkable place. In at least some instances the outcomes that arise when the Design Manual policies are applied are in conflict with the intent of the plan (to create a dense, walkable urban centre).

A4. Municipal Responsibilities and Obligations

The overall Plan places great emphasis on the obligations of private development to deliver on the vision and principles outlined. And yet, coordination of private with public sector investment will be necessary to truly deliver. The document is silent, mostly, on the responsibilities of the public sector to both facilitate and deliver on investments in both the public realm and with respect to transit and transportation infrastructure. Whereas the guidelines focus on the development of private land and how new and heritage buildings will interface with public space and amenities, the document falls short of articulating the design of public streets and spaces, and amenity provision, to deliver on complete communities. The Integrated Mobility Plan makes it clear that the design of land – and the integration of land use planning with transportation planning - is fundamental to delivering more transportation choice in the Centre.

A shared responsibility for implementing the policies of this Plan should be fostered within the corporate reporting structure of HRM. Directors and managers in every department, from legal, traffic, parks, planning to finance (for incentives and annual budget) and even the CAO, have a critical role to play in advancing this policy framework. It's implementation will be challenging if it is understood or seen to be a framework of the Planning Department only.

II. FOUNDATIONAL ISSUES

A clear guide for each director to make decisions by is required, not unlike the approach used to good effect with the 2006 Regional Plan. In addition, the HRM legal team has an obligation to work collaboratively with planning staff to implement the policies of this plan once it becomes council policy. Again, once adopted, this Plan will be HRM policy that ought to direct the work of all staff, not just planning staff.

City building is a shared activity that makes demands of the private sector to ensure the public interest is maintained and enhanced as the city evolves. As part of this social contract, municipalities make provisions and investments to build confidence in the future trajectory of the city. Frequently, investments in public parks, for example, are used as a revitalization tool to attract private investment in regeneration areas. Throughout the document it is essential to make clear the municipal strategy related to infrastructure investments in water, energy, transit and community amenities such as schools, parks, recreation centres, libraries and social services to demonstrate the commitment of the municipality to uphold its responsibilities with respect to creating complete communities.

A great local example of private investment following public investment is the new Central Library. The level of well-considered public investment on that site has generated millions of private investments on adjacent sites. Beyond the monetary measures, the library has also injected confidence into the public and private sector alike.

B1. Ensuring the Vision of Neighbourhoods for Everyday Life Materializes

The Plan presents a vision of neighbourhoods for everyday life, with an emphasis on a mix of uses (Complete Communities), redesigned for people (Human Scaled and Pedestrian First), in a predominantly midrise typology (Strategic Growth). This is in many ways a ‘livability framework,’ that puts people at the heart of the planning process and is an excellent foundation for the future.

But a few key strategic questions emerge as to its deliverability. What is the alignment between built form and job growth, that will enable a mix of uses in various corridors and centres throughout the Regional Centre? While Package B will deal with specific areas dedicated to employment intensive uses, will specific sites within Package A be protected for employment uses moving forward – and if so, where is this locked down in policy? For example, can corridors sufficiently accommodate and absorb employment uses in midrise typologies, or should specific sites be recognized (due to their scale, or depth) for employment uses, and residential restricted?

If the objective is to achieve neighbourhoods where people can “shop, live, work and play” as well as “conveniently access the goods and services they need” how will this mix be secured? A market driven approach will likely result in the development of mostly residential. If residential uses begin to transform revitalizing corridors first, it will become difficult to obtain land for community amenities and employment uses later. This is where strategic planning on the part of government services and agencies, as well as incentives for employment uses, becomes essential to ensuring a mix in each neighbourhood in advance of new dense buildings appearing. In the absence of a specific and strategic framework to deliver this mix, it will not materialize.

B2. How Much Growth, and Where Should it Go?

It is well established in the Vision and Principles of the Plan that complete communities that are walkable are a desired outcome. Key Centres, Corridors and Future Growth Nodes have been identified to absorb significant growth towards this end. Having sufficient liquidity, or development reserves, is essential to ensuring flexibility in the event that some sites do not redevelop (which is likely) within the 13 year time frame of the Plan. Many variables influence whether or not a land owner is interested in redevelopment. A more permissive regulatory context enables redevelopment, but does not require it. Sometimes a profitable, stable, existing use and/or a long term tenant means a site with considerable redevelopment potential will remain 'as is' for an extended period of time. It is imperative to bear this in mind when linking the rationale for the height framework to the need for density to deliver complete communities to the need to absorb growth in the Regional Centre.

If the supply of developable sites becomes too constrained, land prices will escalate and the viability of redevelopment will become more challenging. Getting the balance right on the supply side, in combination with incentives where needed, is necessary to ensuring developers remain interested in investing in the city.

As a result, the rationale for the height and density framework as proposed in the Plan needs to be clearly articulated. Some municipalities, like Toronto, use performance measures to determine appropriate heights (such as mitigating shadows on parks and sidewalks). In Toronto, this materializes in a midrise typology between 6 – 11 stories, and the appropriate height is determined by the width of the right-of-way of the street. Others like Hamilton, use alignment with natural features (the Niagara Escarpment). For Hamilton, this has resulted in the adoption of a new policy framework wherein on tall building sites, all buildings are capped at 30 stories. Some cities, such as Paris, use historical context as the basis for their height rationale. Others use a more nuanced approach that is evaluated based on the impact to the overall sky line

of introducing new tall buildings. In the context of the Regional Plan, it is unclear as to what the basis of the rationale is for the heights proposed in the built form framework. In some instances, narrow and wide right-of-ways alike are capped at a midrise typology. On the narrow right-of-ways this may be too tall; on the wide right-of-ways this may represent a missed opportunity for more density. This requires clarity for a variety of reasons, but particularly so that the plan can potentially adapt to a higher growth scenario than anticipated, while still maintaining its livability objectives.

The Plan is adopting GFAR as a framework to managing growth, albeit in a manner that is, on the face of it, confusing. Developing through FAR has the potential to allow for creativity in design while controlling scale and density. However, there are some potential issues with the way FAR is used in the context of the Plan. First, using GFAR over FAR will penalize developers interested in providing more liveable buildings through indoor amenities such as larger bike rooms, play areas for children, and community rooms - as such uses will accrue towards the density calculations. It could also be argued that this approach penalizes green building practices, such as Passive House, that require thicker wall assemblies than standard buildings. Again, these areas are deducted from overall leasable space available within the building. Second, the modest GFARs provided in many of the areas appear to be handicapped through the use of overly restrictive height limits and city-wide stepbacks and setbacks. This results in many sites not achieving their full GFAR potential. Finally, the proposed blanket density bonusing regulations could further discourage redevelopment of sites identified for high density development. The Plan will fall short of achieving its growth targets if application of GFAR, or FAR, is not carefully analyzed and modeled. Case study analysis is required to understand the cumulative impact of these measures.

Given all the considerations of good urban design, neighbourhood character, adjacencies, and other good design principles are respected, a good guiding objective for height and density may be to allow for maximum envelope possible on each site.

The Design Manual introduces a higher expectation with respect to material quality, attention to detail, and contribution to the public realm than existed previously. Setting the expectation high for the Regional Centre is imperative to affirming the character and quality of the overall identity of the city for the future. At the same time, there is a risk that infill projects might become too difficult to pursue in relation to the opportunities elsewhere in the city. Could the Design Manual act as a disincentive to development in the core? HRM should want to encourage infill growth – as essential to addressing the sustainable growth imperative of the city and reducing its environmental footprint. One way to do so would be to expand the criteria in the Design Manual to the rest of the city, within reason. For example, the Sustainable Landscape Practices could easily be applied and embraced city-wide.

Key recent decisions, albeit at the Provincial decision-making table, reinforce suburban redevelopment, including the building of a regional hospital facility and significant capital allocations to building more highways. The risk is that by requiring a higher quality of development in the core, HRM unwittingly bumps and incentivizes development to the suburban fringes of the city. To mitigate this, serious consideration should be given to the infrastructure investments that ought to be advanced in the Regional Centre to rebalance and recognize the priority of development in existing areas, and consideration should be given to adjusting fees and taxes to act as an incentive for infill growth. Given the more complex nature of development on infill sites, a dedicated Planning Team should be assigned to assist in expediting redevelopment in the Regional Centre.

B3. Planning for Parks, Open Spaces and the Ecology of the City

A key building block for walkable cities is the open space vision and parks plan. The street network, ideally, is embedded within this larger vision of open space planning that becomes the fabric upon which urban life unfolds. As the Regional Centre becomes denser, the open space framework and the ecology of the city will become more critical to ensuring the long term livability of HRM. Not only is a clear vision required, but this vision is essential to generating the social license required to support adding more density to existing places. At the least, the Plan should outline a clear vision for the ecology of the future city, and how an open space framework will serve to enhance natural systems and access to nature for residents. A commitment should also be made to developing a bold plan that both capitalizes on existing parks and open spaces, outlines how they will be maintained and the mechanisms available for reinvestment, and draws a clear connection between open spaces, parks, street design and dense new neighbourhoods. The quality and character of the public realm presents an opportunity to link together existing uses and neighbourhoods, which is essential to building out a walkable urban fabric. Currently, in many areas of the Regional Centre, large roads act as barriers to pedestrian movement. The Plan should speak to the role that HRM will play in redesigning the public realm to deliver on Complete Communities and Pedestrians First using municipal infrastructure design.

Also essential to the livability of dense urban areas is the replenishing and maintaining of the mature tree canopy, particularly as redevelopment takes place. While in historical neighbourhoods the tree canopy is a defining feature, in other areas it is non-existent (Wyse Road), and in others it is declining as trees reach the end of their life span. While Halifax's Urban Forest Master Plan addresses such issues, a commitment to this plan through Centre Plan policies, by-laws and design guidelines is required.

III. SECONDARY PLAN CONTENT REVIEW

This is a section by section review of the content in the Secondary Plan.

a. Introduction

Plan's Section 1.4 Opportunities and Challenges: The logic of the Urban Structure rests on assumptions as they pertain to growth in the centre. If these assumptions prove to be unsound, the overall structure would require reconsideration. Setting a target of 40% of HRM's growth to be directed to infill sites is laudable, ambitious and necessary. But the timeframe identified is constrained – the Urban Structure Plan anticipates absorbing a significant amount of the 'upzoned' growth by 2031, only 13 years out. A framework over a longer time frame would allow for more overall flexibility with less emphasis on specific sites and more of a focus on performance criteria in keeping with the overall Plan vision (and would seek to absorb more units). Even as an academic exercise, it is essential for HRM to consider where 30, 50 and 100 years of densification in the corridor could be accommodated, to ensure that over the long-term the Regional Centre will continue to urbanize.

As such, this is a short-term planning framework and it is yet to be seen how it will reshape the business model of development in the Regional Centre. There will be market adjustments that will require constant monitoring in order to understand the implications of this policy. Understanding how longer-term growth can be accommodated is essential.

There are many scenarios that could unfold and warrant attention – and even modeling - but I will outline two for consideration.

In the high growth 'perfect' situation scenario, new development is built on the sites identified primarily in the centers and corridors as per the policy framework, and these sites undergo a significant transformation in a relatively short period of time. In this timeframe, growth is accommodated precisely where it is expected. But a new problem quickly emerges. Where does the next wave of growth go beyond the 13 year timeframe? The risk,

as I see it, is that by painting the strokes quite broadly and assuming that the vast majority of new development will be midrise, within a 20-30 year period existing residential neighbourhoods will experience development pressure. In the short term, accommodating more growth in some areas where adjacencies allow and performance standards can be readily achieved will ensure that underdevelopment in corridors does not, in the near future, compromise the integrity of heritage neighbourhoods or stymie growth.

In the second scenario, there is a perception of scarcity with respect to developable land and/or developers decide it is infeasible to redevelop smaller scale sites in keeping with the design guidelines as prescribed. It's critical to note that this is a real probability. The design guidelines as articulated do have greater impacts on smaller sites, thereby making it more difficult to accommodate smaller scale developments. Although some sites on corridors have been upzoned from two or three stories to six, the development proforma might not work (particularly if there is a viable existing use) and these sites will either be assembled over a longish period of time to create a larger parcel or they will remain as is. For this reason, the growth targeted areas need to include some generous assumptions to ensure that growth is not hindered by a limited number of truly developable sites. A site by site analysis could be the basis of an analytic approach wherein the risk of 'no-growth' in the near term is assessed. Once 'slow-growth' sites are identified, the remaining sites in the Regional Centre could then be evaluated against slow, medium and high scenarios to better understand the capacity for absorption, and to ensure that there is a reasonable basis for assuming that proposed heights and densities align with a desirable pace of construction, population growth, and employment growth.

With respect to large sites, one of the challenges to untangle is the relationship between current uses (and therefore value) on larger sites that have been identified for redevelopment and the time/trigger that might precipitate redevelopment. While some sites that are identified as underdeveloped will, through this planning framework, see a liberalizing

of development rights, this does not mean that in the short term the viability of redevelopment is imminent. For example, despite creating a new road and block structure for the Scarborough Town Centre in Toronto (where a large mall now sits), and the advancement of a subway extension to this centre, the strength of the current mall function means the land owner has no intention of redeveloping the centre within a 20-30 year time frame. While the City of Toronto would like to see the site redeveloped in the near future as a means towards urbanizing the centre, the business case for the land owner is not favourable to do so. These market considerations are also relevant for corridors. Whereas the policy framework for Wyse Road assumes high rise, it is my understanding from the industry that wood construction is what the market currently supports. As such, in the short-term I would recommend either incentivizing high rise development along Wyse Road (knowing that market drivers are not in place), or remove from the absorption projections the Wyse Road sites. If the desired typology is high rise, it would be best *not* to accommodate midrise in the short-term, as this would represent an under development of the area.

The issue here is planning for the difference between what is zoned for redevelopment versus what can reasonably be expected to be developed in the short/medium term. Determining this is not scientific, but is contingent on a myriad of variables. However, we do know that upzoning alone will not act as the impetus for change. On top of the land value, the particulars of the ownership structure of the land/site, as well as the owner's individual income tax position and overall financial position [debt/mortgage], will have an impact. On many of the sites identified as key areas to absorb growth, it is possible that within the 13 year time horizon, the land value as a development site will not exceed the land value with its current, existing use. This, of course, will make the risk associated with redevelopment untenable to owners.

The development of 18,000 units would be a 70% build out of the areas covered by the Plan. As such, an assumption herein is that over the next 13 years 70% of the frontages of the streets in the Plan that have

been given higher designations would be built out. That is a ratio of 3:2 in which out of every 3 properties zoned for development, 2 is assumed to be developed by 2031. This assumption included large sites like Halifax Shopping Centre and the Canada Post Lands, among others. As a basis for the inventory analysis for the Plan, this is problematic. That the majority of these properties will be deemed redevelopment sites, and that the owners will want to sell/develop all of these sites within the next ten years, is unlikely, even in a high growth scenario. In light of viable existing uses on many of the sites identified for redevelopment (remember the Scarborough Town Centre example above), a more realistic ratio is 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.

Plan's Section 1.4.2 Sea Level Rise: Whereas Sea Level rise is identified within the opening section of the plan, there is no subsequent section that reveals the infrastructure strategy, or the built form implications, of rising water levels.

b. Vision and Principles

Whereas the vision articulates 'Complete Communities' as the foundation of the urban structure, there is no analysis to demonstrate how this will be achieved. What planning tools and metrics will be used to ensure that the amenities and social services required for a walkable centre will be delivered? At what scale is a complete community defined? How will HRM provide an integrated approach to service delivery to provide amenities to local communities? For example, local libraries, recreation centres and health services are a critical overlay to ensuring complete communities. Local schools are necessary also, and ought to be promoted through the Regional Centre Plan, and policy should identify the need for collaborations with other levels of government to ensure an alignment of strategies. Mapping of existing facilities combined with an identification of the gaps in this infrastructure should be tied to densification. Ideally, densification should also be tied to areas where there is existing capacity, first. Policy tools should be utilized to link

together new developments with the provision of amenities that are deficient (such as daycare spaces). The plan requires an additional **Character Area Plan** (which could be included in this section, Vision and Principles) that identifies the various neighbourhoods, the walksheds for them, and outlines a strategy for ensuring that local health facilities, daycares, recreation centers and educational facilities will be provided within a walkable neighbourhood. To do so, coordination is required with the Ministry of Health and the Ministry of Education, in addition to municipal service providers. This exercise will also raise questions about density. The risk, of course, is that under achieving with respect to density makes it difficult to provide neighbourhood amenities. Densities should be measured within these Character Areas to ensure sufficient catchment areas to deliver on the objective of **Complete Communities**. The Urban Structure might require revisiting if densities are consistently too low to deliver amenities within dense, walkable neighbourhoods.

The focus of the Regional Centre Plan with respect to **Pedestrians First** in policy pertains primarily to 'human scaled' building design. And yet the interface between this Plan and the Integrated Mobility Plan should be about the integration of land use planning and transit corridors, at the outset. It is unclear how the transit corridors have informed the Urban Structure, and the extent to which the promotion of transit-oriented development has been a key driver in the Growth Nodes. A strong cross-referencing is required, particularly since the Integrated Mobility Plan identifies as a key pillar the integration of land use planning with transit planning. As per the Integrated Mobility Plan, specific strategies are required to identify how the Growth Nodes will be integrated into the public transit infrastructure of the city. At the moment, the Mobility Plan leaves this to be further resolved through planning policy, and this planning policy leaves it open ended.

In addition, there is a gap between the Integrated Mobility Plan and the Regional Centre Secondary Plan with respect to street design. Key to creating a walkable community is the redesign of streets

as places of pedestrian priority that provide a safe environment for cyclists and pedestrians. Particularly along the corridors, which are intended to absorb significant growth, the Regional Centre Plan must speak to the required redesign of road right-of-ways, sidewalk widths, and street design (such as bump-outs at wide corners) to promote a safe walking environment. Reference to the Complete Streets policies in the Integrated Mobility Plan is essential.

c. Urban Structure

Policy 3.2.2 Large Lots: Consideration should be given to adding an affordability requirement for large sites that differs from the system established in the Land Use By-Law. Criteria should include a requirement to reintegrate these sites into the existing urban fabric through urban design and landscaping considerations, as well as through street and pedestrian connections, as identified.

There is a clear logic to the eleven land use designations, however consideration should be given to adding a sub-layer of designations to the corridors, which might speak to either their built form or their transportation function. For example, Gottingen and Robie are fundamentally different in character than Quinpool and Wyse Road, and ought to be governed by fundamentally different design - and even development - principles.

Policy 11: Some flexibility should be considered with respect to requiring commercial uses where buildings face designated Pedestrian Oriented Commercial Streets. One option might be to link this requirement to the scale of a site. The risk is that this requirement acts as a disincentive to redevelopment, if commercial vacancies are high. It is my understanding that commercial vacancy is at its highest point likely since WWII. Downtown Halifax Class A market has a commercial vacancy rate of 22% and the rest of the city is 15%. The capacity to absorb commercial at the ground floor will be challenging in light of this, and particularly given that retail is currently undergoing a significant transition as a result of the uptake in on-line shopping. The objective should be pleasant

and welcoming streetscapes. Well-designed amenity space or residential at-grade, or live-work space at-grade, can serve to animate the public realm in an appealing way for pedestrians. Design guidelines specific to this treatment should be prepared to ensure acceptable setbacks and landscaping to maintain privacy for the at-grade residences while also recognizing the interface with the public realm.

3-3.2.7 Centres: The Regional Centre Plan requires further detail in describing the distinguishing features that define the character of the centres. Whereas the Plan indicates that development standards shall be established, each of these areas requires a much more fine grained analysis in advance of adopting the height framework, that also takes into account a broader neighbourhood analysis. For example, in some areas where a narrow road right-of-way exists, prioritizing midrise development might be too aggressive. In other areas, where the road right-of-way is significantly wider and the existing character is less distinct, midrise typology might be underwhelming. Given the primary role that these corridors will play in absorbing growth, addressing the vision of creating complete communities and transit-oriented development, and the special character of Quinpool and Gottingen, a site by site planning framework is required that adheres to a higher level set of principles.

3.3 Corridors: Critical to the success of the corridors will be the character of the street. A street section should be provided that responds to a variety of different street widths, and recognizes the need for cycling facilities and wider sidewalks. The interface of buildings along this corridor with the public realm will determine the quality of the walking environment, and street life. Emphasis should be placed, in the planning framework, on delivering high quality public spaces through partnerships between developers and the public sector.

d. Culture and Heritage

Narrative should be added at the outset of this section that both illuminates and acknowledges the First Nations, African Nova Scotian and Acadian stories of the HRM.

A much stronger policy statement is required that recognizes the culture and heritage and history of HRM, while at the same time acknowledging that it is the objective of HRM to ensure that as change takes place, the cultural and built heritage will be better enhanced, protected and advanced. Given historic tensions in HRM pertaining to historic preservation, the Regional Centre Plan should be used as a tool to affirm the importance of better investing in, and preserving, heritage resources. In addition, a clear role should be articulated for the municipality in facilitating heritage preservation as the Regional Centre enters a high growth period. It is a missed opportunity not to do so.

A significant number of Future Potential Heritage Conservation Districts are identified. Much stronger language is required in Policy 76 to establish the importance and priority of advancing these districts in an expedited, strategic manner. The risk is that new development pressures materialize, as facilitated by the vision of this Plan, and heritage assets are not acknowledged as a critical component to developing place-specific Complete Communities.

There is an opportunity to potentially expand the Historic Properties proposed district to the Merrill's block, and potentially to Province House, Dennis Building.

e. Housing

A broad and sweeping liberalization of housing policies to permit a variety of new types including rooming houses and secondary units is proposed. This ambitious change could facilitate a gentle form of densification which should be measured and evaluated to determine whether the impact results in more demand for community services. There is an opportunity to link these proposed changes back to the vision for creating Complete Communities, and a diversity of housing types in all neighbourhoods.

Policy 80 The requirement for three bedroom units in every multi-unit building to accommodate different household sizes might be prohibitive for some smaller scale redevelopments, if demand for these units

due to price point is low. This building requirement adds additional carrying costs for the developer if market absorption is slower for this unit type, and the requirement should be forgiven on smaller development projects with less overall units. However, on large scale projects, a specific requirement of 5 – 7% three bedroom units may not be onerous, but should be assessed based on market conditions, and added in as a requirement on a project by project basis. In addition, incentives should be put in place to enable more larger units in larger projects at an affordable price point to ensure access to multi-unit housing for families.

A section should be added under **Policy 80e** that speaks to the design of multi-unit buildings to ensure indoor amenities such as craft and play rooms for families and children, and in particular stroller parking, are included as well as the outdoor amenities highlighted.

Policy 82 specifies that the municipality ‘may’ provide incentives to encourage infill housing through the Land Use Bylaw. At the same time, in the Land Use Bylaw, new requirements to build affordable housing have been conjoined with new bonusing requirements. Policy 82 recognizes that incentives may be required to facilitate infill housing in some locations; in the LUB, 198 (1) affordable housing is required to be at least 75% of the total value of a required public benefit achieved through bonus zoning. There is a misalignment between these two objectives. One is positioned in such a way as the municipality is making a contribution to infill housing, the other is demanding the developer contribute affordable housing in exchange for density in infill housing.

Policy 83 indicates that the municipality ‘may’ monitor the rate of housing stock change. In light of the proposed policy changes, the municipality ‘should’ monitor the rate of housing stock change and should provide this data on an annual basis in a public report.

Policy 84 A more direct policy statement is required with respect to the municipal role anticipated in facilitating affordable non-market housing. Policy 84 indicates that the municipality ‘may’ consider the use of surplus lands for affordable housing. A more progressive approach that will truly yield outcomes would be to develop a ‘housing first’ policy whereby all surplus lands are first considered for affordable housing prior to disposition by the municipality. In addition, a strategy should be developed to proactively identify key sites and areas of the city where strategic land holdings could be acquired by the municipality for partnerships with both private and public sector agencies, to develop affordable housing. In particular, the municipality should pursue acquiring lands adjacent to key community amenities like schools and rapid transit stations.

f. Economic Development

This section of the Plan does not articulate what the economic development strategy for the Regional Centre is, and the role that this planning framework will play in advancing it. It is necessary to do so. For example, if manufacturing or port uses are expected to shrink or to expand, in both instances there are land use planning implications that ought to be accounted for in this strategy. Given that a level playing field does not exist for manufacturing, industrial, institution or employment growth in relation to competing for residential land, it behooves HRM to have clarity as to how the demand in each of these areas will be sufficiently accommodated in the long term. In addition, increases in density will increase demands for health care services. How is this accounted for in the plan? Is the possibility of expansion for large scale employment uses – like an Amazon HQ – anticipated for the Regional Centre, and if so, where can these strategic investments be located in a way that advances Complete Communities? Some analysis ought to be incorporated into this section that anticipates changes within various sectors (including military, financial and logistics) and identifies the implications of these changes from a land use planning perspective.

g. Mobility

The first objective in this section pertains to prioritizing pedestrians ‘first’ in all transportation decisions. Further detail is required to determine how this will materialize. The Design Manual clearly articulates built form priorities that seek to create a positive walking environment for pedestrians. And yet the document is silent on the most important elements necessary to creating a safe city for pedestrians – controlling speeds, introducing bump outs and widening sidewalks, redesigning of right-of-ways to prioritize those on foot.

This section would benefit from a map of the Regional Centre that establishes the planning walkshed for each community, the high street of those communities, and a hierarchy of streets within each complete community. 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.

Policy 96 There is an opportunity within this policy to speak specifically to the priority of 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 time frame to deliver this infrastructure in a concerted way and to enable safe cycling as a real choice.

Policy 97 establishes that the municipality ‘may’ carry out traffic calming and diversion projects to improve conditions for walking and bicycling. A stronger statement is required. If pedestrians are truly the priority, in many areas of the Regional Center immediate interventions are required – such as the slowing of speeds through a reduction in speed limits – to demonstrate this to the public. Street redesigns should be pursued in highly visible corridors to signal the shift in priorities and to provide a visual clue to cyclists that they are valued, welcomed, safe and encouraged in

the road space. Examples of what is intended as traffic calming interventions should be provided given that different approaches fit with different kinds of contexts, and this should be specified. HRM should consider referencing and embracing Vision Zero if the intent is to prioritize pedestrians, and their safety.

h. Environment

While increasing the tree canopy coverage is identified as an objective in this section, there are no policies that demonstrate how the tree canopy will be safeguarded and expanded.

Policies should be added pertaining to run-off and the importance of creating porous surfaces as a part of all new developments. Incentives, in the form of fee reductions, should be provided for developments that limit.

Policies should be added pertaining to requiring green roofs on all new buildings.

Policy 103 Further detail is required to demonstrate the role the municipality expects to play in advancing more sustainable design. Will a Green Standard be created? If so, this policy should outline its scope.

Whereas an open space network is identified as desired in **Policy 105**, one is not proposed, nor is a process put in place to ensure that the open space framework is tied to densification and creating complete communities. This is a fundamental oversight, and required to ensure new populations have excellent access to open space.

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.

i. Implementation

Policy 10.1 It is suggested that the 2008 Community Engagement Strategy will guide consultations on amendments to the Plan moving forward. Given the weight of the potential impact of the Plan, and the variables which surround land use planning (the market economy, shifts in the workforce), it is essential to have a clear and regular process for review. Within this section, a framework that both mandates and governs how the Plan will be both monitored and adjusted must be explicit, to build the confidence of stakeholders that what is positioned as a 13 year plan does not, inadvertently, become a 40 year planning framework. The municipality has an obligation to provide this clarity, indicating a regular review period, and the expected scope of that review.

The Centre Plan should become a guide for the annual capital budget. And conversely, the annual budget should embed the Plan. One should be able to read the annual budget and “see” the Centre Plan implementation.

Policy 10.7 The policies pertaining to Investing For Growth identify a critical risk to the proposed planning framework, that is, that the investments required from the public sector to deliver on the overall vision do not materialize, or only materialize in part. Greater confidence must be built, in this section, in the probability that the public sector will advance both the planning and capital investments required to manage the growth proposed, and to accommodate a denser approach to urban development. Each of the **Policies 121-125** should be reworked with stronger language which commits the municipality to both develop the more detailed programs required, and to implement them within a timeframe that aligns with the growth framework in this plan.

Policy 124 Following the development of Character Area Plans for the Regional Centre that will identify the ‘walksheds’ for each Complete Community (as suggested earlier in this document), criteria should be established to determine the areas that will be first in the queue for local urban design plans and

capital investments. The first suite of projects should be identified and brought forward with the Regional Centre Plan, to ensure that a commitment to their advancement is fully integrated with Plan approval. The municipality has investment obligations to ensure complete communities evolve in a manner that is comprehensive, replete with requisite infrastructure needs, just as the private sector has obligations to the public interest, as articulated and enshrined in this document.

Policy 123 Similarly, an Implementation Plan designed to expedite the development of multiple Heritage Conservation Districts at once should be brought forth as a companion document to this Plan. Doing so will build public trust that as significant change is permitted and advances in a relatively short period of time as a result of this policy framework, the protection of heritage assets will be secured in policy. Heritage incentive programs, alluded to as a possibility in **Policy 123**, should also be advanced as part of the Plan, for similar reasons.

It is my understanding that Staff has historically been unable to keep up with demand for the creation of Districts. The Downtown Plan created one immediately (Barrington) and identified two more for rapid implementation. The Downtown Plan was adopted 9 years ago, and neither of the other two have been implemented. This points to a serious need for a bigger and an enhanced heritage department. Halifax is a city of heritage, one of Canada’s and North America’s oldest cities – the need for a heritage planning department, supported by new hiring and massive incentives for property owners to reinvest, is necessary.

IV. THE LAND USE BY LAW REVIEW

Following are detailed technical considerations based on a review of the Land Use By Law.

Part One

Appeal of Decision (pg 20): Consideration should be given to defining under what circumstances an appeal will be considered. As it stands in 29, anyone can appeal any approval regardless of type, size, location or for any reason.

Non-Conforming Structures (pg 21): Clarification is required to the statement, “if the non-conformance is not made worse.”

Part Two

Pedestrian-Oriented Commercial Streets (pg 28): add, (p) other uses as deemed appropriate by the Development Officer

Part Three

Dwelling Unit Mix (pg 36): Policy 58 (2) (b); consider amending this requirement, as per earlier comments, to be applicable in projects of a certain scale, so as not to deter smaller scaled developments.

Amenity Space (pg 36): Consider amending, or adding, criteria with respect to the quality and the character of publicly accessible amenity space, frequently referred to as POPS – Privately Owned Publicly Accessible Space.

Part Four

Minimum Lot Area (pg 46): It is unclear why “any other zone” is included, and it is recommended to take this zone out of the policy (in both sections).

Part Five

Number of Buildings on a Lot (pg 49): It is unclear as to why a maximum of one main building is permitted on a lot, particularly recognizing many irregularities with respect to lot size in the Regional Centre.

Viewing Triangles (pg 50): This regulation appears to

be a requirement by traffic engineers to provide better viewing corridors for vehicular traffic in suburban communities. This requirement does not have any added benefit in an urban context and will undermine other urban design objectives related to activating ground levels.

Prohibited External Cladding Materials (pg 50): In some instances, and for some design elements, plywood or concrete block could be utilized as a design element and should be qualified within this list.

Features Exempt from Maximum Height

Requirements (pg 53): Pitched roofs of 6-7 metres should be considered as exemptions, and therefore added to Table 4.

Maximum Lot Coverage (pg 57): Policy 106 (1) (b) (c) The rationale for the maximum coverage of 80% and 50% is unclear.

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.

Streetwall Height, Streetwall Stepbacks, Side and Rear Setbacks and Stepbacks (pg 59 + 60): the bylaw is too broad to be applied across different zones and street right-of-ways, without consideration for the character of the street, lot depths, and the urban room that is created. These guidelines need to be designed on a street by street basis, also taking into account existing conditions, adjacencies, rear lot conditions, and heritage assets that may be a part of the streetscape.

Part Eight

General Landscaping Requirements (pg 79): Policy (3) is specific, and may be too constraining on small sites and/or smaller scale developments. An exception may be required to qualify the requirement.

Requirement to Submit a Landscape Plan (pg 86): Consideration should be given to an exemption to the

requirement of having a registered landscape architect prepare the plan, for small scale projects.

Part Nine

General Parking Requirements (pg 89): Policy 149 (1) (a) Porous materials should be encouraged, in place of asphalt and concrete. (7) Landscaping materials and lot design should be encouraged to facilitate ease of pedestrian movement. Ramps to address slope seems onerous on the Peninsula.

Required Number of Motor Vehicle Spaces by Zone and Use (pg 91): Consideration should be given to less space requirements for Multi-unit dwellings, or a market demand based approach. In very urban areas, 1 space for every 3 units might constitute an over building of parking, as would one space for every classroom, and 1 space for every 75 sq m of GFA of office space.

Bicycle Parking (pg 96): This section contains considerable detail that seems to be out of scale with the level of detail throughout the rest of the by law.

Class A Bicycle Parking Requirements (pg 99): Shower facilities at the rate of one shower for every 10 cyclists represents an overbuilding of such facilities.

Part Eleven

Density Bonus Regulations (pg 114): There are some potentially significant issues related to the density bonus framework proposed in the plan. The only way to investigate the implications of the proposal is to apply the provisions on a site by site basis and to use the case study analysis to extrapolate more broadly the implications. This testing must be undertaken by the municipality in partnership with the industry and CMHC to identify refinements that are required, and this analysis should be made available to the public to deepen understanding of what appears to be a complex system of development.

The approach to integrating affordable housing into density bonusing is unconventional in a market of this scale, and that is primarily building rental supply, as is. Consideration should be given as to whether the

fact that at least 75% of the total value of the required benefit must be allocated to affordable housing will act as a disincentive to achieving more significant densities (i.e. the bonus is not an incentive for additional development in the context of the overall development proforma). It would be an unintended and unfortunate outcome if less housing is built over all due to an overly onerous affordable housing requirement. It is also unclear as to whether the municipality has a role to play in financing the development, or operating, of these units in some way. In the Toronto context, affordable units that are secured through development review and built by private developers are supported by the municipality and the province through granting programs, as a means to achieving affordability. A cash-in-lieu program that is funneled to non-profit housing developers as identified through an open process by the municipality might be a better means of developing a critical mass of affordable rental housing, particularly if there is little uptake on bonusing due to the affordable housing requirement.

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. Density bonusing requirements must be designed to hit a relatively small sweet spot wherein the developer sees enough value creation to be incentivized to build the additional units. Consideration should be given to alternative approaches.

Public Benefit Requirements: Public Art (pg 120): Given that public art is a part of a long list of other public benefits that account for only 25% (after affordable housing requirements are met) of the public benefit value achieved through bonusing, the extent to which this system will result in the provision of public art is questionable. A better system would be to require 1% of capital construction costs to be allocated to public art on all projects over a certain scale, as a means to beginning to investing in, and develop, a substantial public gallery of art.

Appendix A: Participants

I would like to thank the following individuals and organizations who generously shared their perspective on the Centre Plan documents with me:

- Abigail MacEachern, Architect, Architecture49
- Andrew Giles, Brunello Estates
- Andy Fillmore, Urban Planner, Member of the Parliament
- Ben Young, Southwest Properties
- Carl Purvis, Planner, Halifax Regional Municipality
- Cesar Saleh, P.Eng, WM Fares
- Chris Crawford, Architect, Ekistics
- Dale Godsoe
- Dan Goodspeed, Architect, Kassner Goodspeed Architect
- David Quilichini, PM, Fusion Halifax
- Eric Burchill, Planner, Southwest Properties
- Eugene Pieczonka, Architect, Lydon Lynch
- Fred Morley
- Greg Johnston, Architect, Paul Skerry Associates
- Jeffrey Haggett, Planner, FBM
- Jacob Jebailey, Architect, WM Fares
- Jacob Ritchie, Planner, Halifax Regional Municipality
- Jenny Lugar, Our HRM Alliance
- Joe Gnemmi, Planner, Fusion Halifax
- Kathleen MacEachern, Halifax Chamber of Commerce
- Kelly Denty, Planner, Halifax Regional Municipality
- Kourosh Rad, Planner, Compass Commercial Realty
- Louis Lawen, Developer, Paramount Management
- Matt Neville, Planner, EDM
- Michael Napier, Architect, MNA
- Mike Christian, Intern Architect, Architecture49
- Mitch Dickey, Planner
- Neil Lovitt, Planner, TurnerDrake
- Nicole Babineau, Paramount Management
- Paul MacKinnon, Downtown Business Commission
- Peter Bigelow, Planner, Waterfront Development Corporation
- Peter Polley, Developer, Polycorp
- Rob LeBlanc, Planner + Landscape Architect, Ekistics
- Robert Richardson, Compass Commercial Realty
- Ron Smith, Architect, Studioworks International
- Ross Cantwell, Developer and Real Estate Consultant, HRM Apartments
- Steffen Käubler, Planner, Upland
- Steve Higgins, Planner, Halifax Regional Municipality
- Sue Sirrs, Landscape Architect, Outside Planning & Design
- Tony Maskine, Developer, Blue Basin Group
- Tristen Cleveland, Planner, Dalhousie PhD Candidate

Appendix B: Jennifer Keesmaat's Key Recommendations on Centre Plan Package A

Correlation of Plan's Vision and Policies: Whereas the vision articulates 'Complete Communities' as the foundation of the urban structure, there is no analysis to demonstrate how this will be achieved. How will HRM provide an integrated approach to service delivery to provide amenities to local communities? For example, local libraries, recreation centres and health services are a critical overlay to ensuring complete communities.

- **Recommendation One:** Expand and extrapolate the vision throughout the document to connect policy recommendations to larger planning themes.
- **Recommendation Two:** Identify collaborations required with other levels of government to ensure an alignment of strategies to deliver complete communities. Require Infrastructure Plans within HRM divisions to align with anticipated redevelopment areas. Incentivize development in areas that have infrastructure capacity.
- **Recommendation Three:** Re-evaluate the level of detail throughout the framework to ensure alignment between policy requirements and existing conditions. Ensure sites are not unintentionally downzoned.
- **Recommendation Four:** In partnership with industry and design professionals, develop site specific case studies to test the framework and build confidence in its applicability.

Municipal Responsibilities and Obligations: City building is a shared activity that makes demands of the private sector to ensure the public interest is maintained and enhanced as the city evolves. The overall Plan places great emphasis on the obligations of private development to deliver on the vision and principles outlined. The document is silent, mostly, on the responsibilities of the public sector to both facilitate and deliver on investments in both the public realm and with respect to transit and transportation infrastructure.

- **Recommendation Five:** Identify municipal obligations and a process for developing required Infrastructure Plans that will ensure new growth can be accommodated without undue burden.
- **Recommendation Six:** Be bold on committing to delivering higher quality of living in Halifax. While demanding high standards from the private sector through obligatory words such as 'shall' and 'should', hold the Municipality to the same high standards. When committing to goals such as affordable housing on Municipal-owned properties and providing safe walkable streets, consider replacing the voluntarily language of 'may' with 'shall' and 'should'.
- **Recommendation Seven:** Ensure Municipal responsibilities are discharged across multiple departments, and all departments must have accountability in the corporate reporting structure for delivering on their responsibilities.

Height and Density: It is unclear as to what the basis of the rationale is for the heights and densities proposed in the built form framework.

- **Recommendation Eight:** Identify an appropriate rationale and framework for height and density. Ensure Plan does not unnecessarily downzone sites.

Neighbourhood Level Analysis: By applying a detailed policy framework broadly, unintended outcomes will result. The Plan provides prescriptive measures in areas that may not be necessary, and lacks recognition of specific character areas.

- **Recommendation Nine:** Conduct neighbourhood-specific analysis and create appropriate policies, by-laws and design guidelines that would support and enhance the unique character of each neighbourhood.

Level the Playing Field: The Design Manual introduces a higher expectation with respect to material quality, attention to detail, and contribution to the public realm than existed previously. At the same time, there is a risk that infill projects might become too difficult to pursue in relation to the opportunities elsewhere in the city.

- **Recommendation Ten:** Level the playing field between suburban and urban development by providing more resources to Regional Centre projects. Also, place similar design and development requirements on suburban development.

Planning for parks, open spaces and the ecology of the city: A key building block for walkable cities is the open space vision and parks plan. The Plan should speak to the role that HRM will play in redesigning the public realm to deliver on Complete Communities and Pedestrians First using municipal infrastructure design.

- **Recommendation Eleven:** Prepare and embed a detailed parks, open space and city ecology plan into Centre Plan's policies, by-laws and design guidelines.

Recognizing neighbourhood needs: Creating Complete Communities requires a commitment from the private sector, the Municipality and the Province.

- **Recommendation Twelve:** The plan requires an additional **Character Area Plan** (which could be included in this section, Vision and Principles) that identifies the various neighbourhoods, the walksheds for them, and outlines a strategy for ensuring that local health facilities, daycares, recreation centers and educational facilities will be provided within a walkable neighbourhood.

Culture and Heritage: A much stronger policy statement is required that recognizes the culture and heritage and history of HRM, while at the same time acknowledging that it is the objective of HRM to ensure that as change takes place, the cultural and built heritage will be better enhanced, protected and advanced.

- **Recommendation Thirteen:** Narrative should be added at the outset of this section that both illuminates and acknowledges the First Nations, African Nova Scotian and Acadian stories of the HRM. Plan should also be used as a tool to affirm the importance of better investing in, and preserving, heritage resources. In addition, a clear role should be articulated for the municipality in facilitating heritage preservation as the Regional Centre enters a high growth period.
- **Recommendation Fourteen:** Develop a strategy to expedite the creation of Heritage Conservation Districts.
- **Recommendation Fifteen:** Halifax is a city of heritage, one of Canada's and North America's oldest cities – the need for a larger and enhanced heritage planning department, supported by new hiring and massive incentives for property owners to reinvest, is required.

Housing: The Plan indicates that the municipality 'may' provide incentives to encourage infill housing through the Land Use Bylaw. Also, the Plan indicates that the municipality 'may' consider the use of surplus lands for affordable housing.

- **Recommendation Sixteen:** A more progressive approach that will truly yield outcomes would be to develop a 'housing first' policy whereby all surplus lands are first considered for affordable housing prior to disposition by the municipality. In addition, a strategy should be developed to proactively identify key sites and areas of the city where strategic land holdings could be acquired by the municipality for partnerships with both private and public sector agencies, to develop affordable housing.

Mobility: The document is silent on the most important elements necessary to creating a safe city for pedestrians – controlling speeds, introducing bump outs and widening sidewalks, and redesigning of right-of-ways to prioritize those one foot.

- **Recommendation Seventeen:** Map the planning walkshed for each community, the high street of those communities, and a hierarchy of streets within each Complete Community. 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.
- **Recommendation Eighteen:** Identify the strategy for expediting the creation of cycling facilities throughout the Regional Centre.

Public Art: Given that public art is a part of a long list of other public benefits that account for only 25% of the public benefit value achieved through bonusing, it may or may not materialize.

- **Recommendation Nineteen:** A better system would be to require 1% of capital construction costs to be allocated to public art on all projects over a certain scale, as a means to beginning to investing in, and developing, a substantial public gallery of art.

Balancing Certainty and Flexibility: On the one hand, the city and residents would like certainty, and the proposed framework seeks to eliminate the discretionary nature of current approvals. On the other hand, in an infill context, every site is subject to contextual factors that are limiting and unique. Balancing this certainty in the process while providing flexibility is an essential task of the Plan.

- **Recommendation Twenty:** Reevaluate the approach to development review. Recognizing the complexity of infill development, create a highly trained specialized Regional Centre development review team dedicated to expediting approvals and creative problem solving.
- **Recommendation Twenty-One:** Default to overarching intent of each chapter, not to the minutiae of the regulations.

Planning beyond the 2031 horizon: The Plan currently assumes one growth scenario until 2031. How will the plan adapt to a slow (or negative) growth, or faster-than-expected growth? What will happen to established neighbourhoods and the heritage assets beyond 2031?

- **Recommendation Twenty-Two:** Extend the planning timeframe beyond 2031 and consider different growth scenarios (high, medium and low). Consider a slow growth, or worse, decline scenario and ensure the Plan can respond to such scenarios.

Achieving Plan's Growth Targets: The development of 18,000 units would be a 70% build out of the areas covered by the Plan. As such, an assumption herein is that over the next 13 years 70% of the frontages of the streets in the Plan that have been given higher designations would be build out. That is a ratio of 3:2 in which out of every 3 properties zoned for development, 2 is assumed to be developed by 2031. This assumption included large sites like Halifax Shopping Centre, West End Mall, and the Canada Post Lands, among others. As a basis for the inventory analysis for the Plan, this is problematic.

- **Recommendation Twenty-Three:** 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.

Closing the gap between HRM’s existing plans:

The focus of the Regional Centre Plan with respect to **Pedestrians First** in policy pertains primarily to ‘human scaled’ building design. It is unclear how the transit corridors and the Integrated Mobility Plan have informed the Urban Structure, and the extent to which the promotion of transit-oriented development has been a key driver in the Growth Nodes.

- **Recommendation Twenty-Four:** A strong cross-referencing is required, particularly since the Integrated Mobility Plan identifies as a key pillar the integration of land use planning with transit planning. Also, direct references to the Complete Streets policies in the Integrated Mobility Plan is essential.

Economic Development: the Plan does not articulate what the economic development strategy for the Regional Centre is, and the role that this planning framework will play in advancing it.

- **Recommendation Twenty-Five:** Develop a comprehensive, data driven analysis of economic development opportunities. Collaborate with key partners to facilitate and incentivize growth.

Devil’s in the Details: This review is a high level analysis of the Centre Plan documents. There needs to be much more elaboration on the details of every policy, by-law and design guidelines. As an example, through industry consultations, it was identified that even modest GFARs provided are not achievable on many of the sites due to height, setback, stepback and other design requirements.

- **Recommendation Twenty-Six:** Work closely with the industry, designers, planners, economists, and other professionals to model and test the guidelines for unintended outcomes, and modify as needed.

Environment: While increasing the tree canopy coverage is identified as an objective in this section, there are no policies that demonstrate how the tree canopy will be safeguarded and expanded. The Urban Forest Master Plan provides the necessary tools to address such issues.

- **Recommendation Twenty-Seven:** Consistent with the Urban Forest Master Plan, policies should be added pertaining to run-off and the importance of creating porous surfaces as a part of all new developments. Incentives, in the form of fee reductions, should be provided for developments that limit non-porous surfaces.
- **Recommendation Twenty-Eight:** Consistent with the Urban Forest Master Plan, develop recommendations related to protecting and enhancing the tree canopy.

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