

Thoughts on the Centre Plan From CDAC

Intro comments

- Generally, I am pretty happy with where it is at and where it is going based on the discussion so far.
- How are staff proposing to proceed in addressing items flagged as “requiring further discussion” or “changes required”? Will they be presenting proposed amendments as a whole, or high level first? Is this occurring before or after CDAC reports to CPED? Etc. I think it is necessary at this point to understand further their proposed process following finalization of the Comment summary report.
- There are several proposals in the plan that are untested or have generated strong contradictory statements from industry. There is a sense that many proposals have not been tested. (page 15) It does not seem reasonable to implement these without modelling and careful monitoring of outcomes.

Keesmaat Report

- I think a key bit of CDACs role could be to help staff and senior directors **to calibrate the response to high-level feedback like the Keesmaat report.**
- The Keesmaat Report provides a good high-level review of the Centre plan. It raises many questions that the CDAC committee has also raised.
- I don't outright disagree with most of what the report said, though I do feel the analysis of how much needs to be upzoned to achieve growth goals was weak, the report needed to dig deeper into the foundational documents and research to see what is proposed and how it was arrived at.

Vision & Core Concepts

- In considering the current vision of the Centre Plan, there is an overarching concern that the Plan is taking growth for granted. The narrative seems to be moving from a focus on “how do we create and support growth” a sentiment consistent with the regional plan, to “how do we control growth”. This has the feel of “back to the future”, a return to the attitudes and policies that were stifling growth before the Regional Plan and HRM By Design. A generation of Halifax residents grew up with no memory of construction cranes in the city. Halifax seemed to be ceding its leadership position in the region to other cities with more progressive and more aggressive planning and economic development policies. But something changed a dozen years ago. It really began with a regional plan that was and continues to be... growth enabling.
- The Regional Plan is arguably our best legacy document to reflect Halifax's long-term planning and growth priorities. Remember it's vision:
 - **“HRM's vision for the future is to enhance our quality of life by fostering the growth of healthy and vibrant communities, a strong and diverse economy, and sustainable environment.”**
- Remember the Regional Plan's first principle
 - **This plan provides a framework which leads to predictable, fair, cost-effective and timely decision making.”**
- In contrast, the Centre Plan's goal is:
 - **“to create complete communities that meet the needs of a diverse population while accommodating growth in a strategic manner.”**
- . Our vision and goals for the centre plan should be similar to those for the regional plan.

- One of the thrusts of the regional plan that should not be lost in the centre plan is the idea of fairness and common sense decision making.
- 1.3 Community Well-being:
 - To add to the “more discussion needed.” I still feel there is a lack of diverse and equal representation when it comes to soliciting feedback from the community. It may be too late at this stage; however, it would have been nice to see the comments broken down by geographic area or by some population demographics to see who/where the feedback is coming from and note who/where we may have missed in the process. Perhaps this could be explored further in future consultations, and I would love to help.
 - Accessibility considerations are not clear. I would like to see how accessibility is being considered in this plan – pedestrians also include those with limited mobility.
 - Food security – is there anywhere in the plan that limits the number of ‘big box stores’? is there a way the plan can help promote small and medium-sized businesses? The social economy is growing in Nova Scotia, and the plan should create the space or incentives to allow for local business to thrive based on CED components principles (including, social enterprises, co-operatives, non-profits). See greater integration with the Economic Strategy.
 - The current design suggests there may be significant ground floor rental space available for long periods of time. Can HRM provide support for the use of these spaces by non-profits or for use for “storefronts” like the old RBC building was used to communicate the centre plan to local communities?

Economic Development

The Centre Plan proposal lacks strong connection the current economic strategy.

The previous economic strategy (<http://www.halifaxpartnership.com/en/home/economic-data-reports/economic-strategy/2011-2016-economic-strategy.aspx>) had the development of the regional centre as it’s “first priority”. Planning and economic development stakeholders worked together to plan and execute investments like the Argyle St streetscape project designed to grow the regional centre.

Halifax’s first strategy written in 2005 featured the importance of the regional centre as the economic heart of the city. This early plan facilitated a new integration of planning and economic development priorities like HRM By Design and a new convention centre that have proved important to the success of our region. These strategies saw the connection between encouraging regional centre development and successful economic growth for the whole region. That connection is not as strong in our current Centre Plan.

Local Context

- We need to keep it simple while providing developers and staff direction. Ideally, I’d like to see short, 3-4 paragraph character descriptions that can provide that missing local flavour without getting into detail area plans, which we have tried to avoid. **Parks** need to be at the table for this. We are building a lot of new units, some of which requires parks and greenspace to be a part of it (especially far North End).
- The Keesmaat Report calls for a plan to work on schools, health, where complete streets/public realm will be improved to support the proposed centres, etc. In Ontario, my understanding is they are legally required to do this stuff in a Comprehensive Plan

format, but we don't really have that legal framework. The current MPS speaks to this, but generally, it does so in short generalities, two examples below:

9.4 The transportation system within residential neighbourhoods should favour pedestrian movement and discourage vehicular through traffic in both new and existing neighbourhoods. A pedestrian system that utilizes neighbourhood streets and paths to link the residents with the commercial and school functions serving the area will be encouraged.

1.3.1 In order to achieve these purposes, the City does hereby request that the Halifax School Board not affect any complete school closures in the South End without prior consultation with the Council of the City of Halifax, in order that the Council may first ascertain whether such closures may work to the detriment of the retention and creation of family-oriented neighbourhoods, and the nature of any prudent actions the Council may seek to take or direct in furthering its Plan.

- So I think **generating some broad statements on schools etc.** – “the Municipality will establish a workgroup to coordinate the provision of adequate public school resources to service new or expanded residential neighbourhoods” and similar or health, and public realm, and even the character piece. A public realm investment statement for each Centre would help address the concerns about major roads like Wyse not being designated as pedestrian-oriented.
- 2.3 Culture:
 - The narrative is an important component to draw in people's attention, telling them why they should care about this plan. I see First Nations, ANS, and Acadian captured in the notes, but please keep in mind Halifax is becoming a diverse city with immigration and international students as well. Are we looking to the future or basing thing on where Halifax is today? How can we attract or retain people from diverse backgrounds if we're not representing their voice too?
- The committee's previous concerns regarding developing more aggressive incentives for the rejuvenation and re-use of heritage properties have not been fully addressed.

Strategic Growth

- Given that the design and development industry participants and the Keesmatt report have all questioned the likelihood of achieving our growth targets (18,000 units, 2/3 of the available development sites being developed within the 13 years of the plan) with the current draft plan- please request that staff indicate what specific amendments to the draft are intended to address these concerns. From a Consultation monitoring perspective- I think it is imperative for this to be clearly understood, and for the parties that have already made a comment to have the opportunity to review the proposed response and given feedback on the anticipated efficacy. Important to understand if staff are proposing to upzone more land to increase potential inventory and/or develop parallel incentives in areas with more market challenges?
- **IF WE DO ONE THING, IT HAS TO BE TO PUT A HARD STOP ON DAs** like in the Downtown Plan. 3 years is my preference. Council can always extend if it wishes, as we did with Zellars/Discovery Centre.
- I am very glad CDAC voted to consider FAR and not height controls in Centres. I am not convinced this will work in HOR and COR zones.
- Viewing Triangles – don't feel this is required.

- One size fits all – as I said above, I hope we can protect local character without doing detail plans. Character statements should fit the bill.
- There seems to be some concern that the plan could to steamroll character streets like Agricola and Quinpool and replace them with 4, or 6, or 8 story canyons of cookie-cutter buildings. It seems to me that the character of neighbourhoods is largely defined by the quality and vibrancy of adjacent commercial streets. This is certainly the case for Agricola and Quinpool. I am worried about a plan that makes these areas homogenous in character and expensive for business startups. Are we really so worried about height in centres that we are willing to bulldoze corridors full of character buildings? Alternatively, how do we achieve variability inside approved parameters so every 2-3 storefronts the feeling changes? How do we build in character?
- What is the logic for classifying the large tract of Strawberry Hill lands as Intensive employment vs high order residential as requested by the owner? Given that the lifespan of the warehouse buildings is

Built Form – Buildings

- It has been mentioned by many that in an infill context, every site is subject to specific contextual factors requiring specific considerations. Given that the proposed draft plan was structured with broad policy approaches irrespective of geographic or situational context, How are staff proposing to amend the draft policy set, in specific ways, to rectify the issue?
- I do not support through block designation for CEN on Gottingen where it goes into the possible future heritage district at Falkland/Creighton.
- Similarly have concerns about CEN2 punching through to face established residential. I don't think we should follow property lines, the built form facing wood-framed houses has to be regulated to be much much less imposing. There are examples on both the north and south side of Quinpool. Zoning should change mid-block as it does now, not on the property line.
- HOR lot coverage – 50% is too low. 100% is too high. 70%? I would like to see modelling. Maybe recommend CPED and Council request models and examples to guide that decision.
- Setbacks – hold the line. Unless we are accidentally downzoning folks, most of the property is being upzoned, so it has no inherent need for a specific shape or development volume. Land prices will adapt to the constraints. We identified early on in this process that FAR and built form would be controls and small lots may not get a full build-out, and the response is not to relax controls, its to say “buy a different lot”.
- Setbacks and protections between denser development and ER zone – this is critical to my residents supporting Centre Plan – the whole promise was “we are going to protect your neighbourhoods in exchange for more density elsewhere”. Putting development right to the property line, 1970s C zone style, well it implies that eventually that next house is getting developed too. We are drawing a hard line – for the foreseeable future; this is where high-density ends and houses begin.
- GFAR vs FAR vs Height – if we want GFAR to control the Centres, then we should consider increasing GFAR ratios if warranted, not switching to FAR. I don't want to have people arguing about what is and is not included! If volume is our chief concern, lets set it at a developable and appropriate level, and measure everything as proposed.
- 4.1 Built form – I like the comment “One size fits all rules are unworkable.” I'm not sure if this fits here. However, I fear that the effects of gentrification are not fully considered in the plan. What is being done to protect communities from increasing property tax/rents?

- An excessive requirement for support for bicycles (changing rooms, showers, parking) seems out of proportion to costs and benefits.
- While developing capacity for parking is out of vogue, it remains important to neighbourhoods. Nothing will disrupt a neighbourhood more quickly than a new building with inadequate parking that forces an increase in on-street parking.
- Transit and bicycle corridors that force increases in side-street parking for the benefit of people passing through may disrupt nearby residents and businesses at no benefit to the neighbourhood affected. Better transportation solutions are needed
- Transit corridors should not divide and disrupt neighbourhoods... for example Gottingen St. I have a concern that kids will have to cross busy transit corridors to get to school. GS is a heavily used pedestrian street. The plan should have language that protects neighbourhoods from disruption that reduce quality of place for residents.

Built Form Site Design –

- Support staff direction

Density Bonusing

- Density bonus – this is what we should discuss next week! I think 66% is probably too high, but I think keeping it market-based is good, maybe 33%, based on analysis of other related costs (street improvements, power, etc. etc.).
- The creation of rent-controlled apartments through density bonusing negatively affects overall affordability and availability but not by as much as full-blown rent controls or similar policies. Creating some rent-controlled apartments through density bonusing is superior to full-blown rent controls...only in the way a car crash is superior to a train wreck. If this approach is to be tried, there should be a pilot project first so the impacts can be assessed. That pilot should be preceded by a project development phase that includes benchmarking and assessment of the costs and benefits of rent-controlled apartment policies.
- The ingredients for rental market stagnation is pretty simple. Population growth plus “growth control” plus construction crushing public policies like rent controls lead to rental supply shortages and higher costs. That hasn’t happened in Halifax. Don’t use the same policies that created problems in other cities.... Let’s be smarter.
- It makes more sense to use cash to develop progressive, affordable housing policies than to create a handful of rent-controlled apartments. It also makes much more sense to attach this kind of tax to all new construction....not just construction in the regional centre
- Affordable Housing – 15 years is inadequate. We have the 2004 Cantwell report on housing – we should implement that. Take cash, use it. Coordinate with Housing NS. We have a slightly dated roadmap that should be followed. Take the cash.

Other Public Amenity – support staff direction.

- 6.1 Framework and Economics & 7.1 Land use (local commercial): We talk a lot about affordable housing, but is there space to talk about affordable business? What is the plan doing to support local small and medium-sized businesses? What do neighbourhood business associations think? Can the plan support the third sector economy by providing incentives to developers to rent cheaper business space to the non-profits, social enterprises, etc.? We allocate space for affordable housing, public spaces and art, why not for business development as well?

- 7.1 Food and Local Commercial: Could the definition also be broadened to include Corner Stores? These stores are usually locally owned and provide essentials to a wide-range of clientele. They also act as community hubs where connections are made. If supported properly, they can also help alleviate the issues of food deserts and should be promoted in line with Farmer's markets (which not all people from different income levels have access to).
- An "Affordability Matrix" was mentioned at the last meeting – I'd like to know more about what is it exactly? In what context has it been used?

Land Use

- Support Staff Direction

Development Review Process

- I like the idea of out of town folks on DRC
- One Hectare Lots – there are some sites that have single ownership but more than 1 PID (strawberry hill) that should be considered for this policy.
- Environment – Vancouver requires LEED GOLD for all DT buildings. Why not us? At least silver.
- The development and review process proposals seem burdensome and have not been assessed using any form of timeline analysis or sensitivity testing.

Implementation

- Many comments have indicated that the draft placed many requirements on the private sector to address a myriad of public policy initiatives without an articulation of corresponding public sector investment approaches to support these same objectives. What specific incentives and public sector investments are proposed to address this gap, and how will the identified risk of pushing development outside the Urban Center be addressed in the proposed amendments?
- Few partners have been identified to assist with the implementation of the Centre Plan. The partnership focus on regional centre growth was pretty comprehensive 10 to 15 years ago.

Other Issues

- Research and establish the elements of the regional centre social and economic ecosystem. We need to know how the centre plan, other plans, and other influencing factors interact as we move to implementation.
- Commitment needed to the development of a pedestrian master plan.
- Working groups need to be established focused on the retention and expansion of public services in the regional centre, schools, primary medical care, secondary and tertiary medical care, universities, government offices, and other public services.