

April 26, 2019

Christine Corbin, CAE  
Association Executive  
UDI of Nova Scotia  
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Halifax, NS B3J 2R7

Dear Christine,

Thank you for submitting an independent review of the Centre Plan Package A by Ms. Jennifer Keesmaat on behalf of UDI on May 7, 2018.

The Centre Plan project is likely the most important planning initiative undertaken since the adoption of the Regional Plan, and we rely on the expertise and passion of our residents and stakeholders to ensure that we get it right. We appreciate the comprehensive nature of the report by Ms. Keesmaat. The results of the extensive consultation process conducted last spring resonated with many of the recommendations contained in Ms. Keesmaat's report, and I trust that you will see many of them reflected in the revised planning documents as released through the Community Design Advisory Committee (CDAC) earlier this month.

Staff have reviewed the report submitted by UDI last spring, and we are pleased to share our responses to each recommendation in the attached document. Given the complexity of the documents we highlighted the key areas where we feel the recommendations were addressed. Where certain recommendations fell outside the scope of the Plan, we pointed to relevant supporting initiatives. As the report has been discussed by CDAC, we were requested to share our responses with the Committee.

Thank you again for your ongoing engagement and collaboration in helping us shape a prosperous and liveable Regional Centre for the years to come. If you would like to discuss our responses or have any questions about the Centre Plan adoption process, please don't hesitate to contact me.

Best Regards,

Original Signed

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<b>Correlation of Plan's Vision and Policies:</b>	
<p><i>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?</i></p> <p><i>For example, local libraries, recreation centres and health services are a critical overlay to ensuring complete communities.</i></p>	
<b>Recommendation</b>	<b>Response</b>
<p><i>Recommendation One: Expand and extrapolate the vision throughout the document to connect policy recommendations to larger planning themes.</i></p>	<p>In support of this recommendation, the vision for the Regional Centre has been expanded and extrapolated throughout the following parts and areas of the Plan:</p> <ul style="list-style-type: none"> <li>• <b>Part 2: Vision and Concepts</b> articulates the Vision and our Core Concepts.</li> <li>• <b>Part 3: Urban Structure</b> contains objectives for each designation which reference and implement the vision and core concepts through the establishment of zones and detailed policies.</li> <li>• <b>Parts 4 (Built Form and Urban Design), Part 5 (Culture and Heritage), Part 6 (Housing), Part 7 (Economic Development), Part 8 (Mobility), Part 9 (Environment) and Part 10 (Implementation)</b>, likewise, are aligned with the vision and core concepts through policy objectives.</li> <li>• <b>Section 4.1 (Urban Design Goals)</b> further elaborates on the vision and core concepts through three Urban Design Goals, which guide built form policies, and design requirements in the Land Use By-law.</li> <li>• <b>Appendix 1</b> includes key Performance Indicators refer to key aspects of the core concepts.</li> </ul>
<p><i>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.</i></p>	<p>In response to this recommendation, opportunities for collaboration with other levels of government have been strengthened and implemented through the following Plan language and policies, detailed as follows:</p> <ul style="list-style-type: none"> <li>• <b>Section 1.5: Provincial Role in Planning</b> identifies how the Plan is aligned with Provincial Statements of Interest.</li> <li>• <b>Section 5.2, Policy 5.4</b> provides direction to collaborate with community partners, residents, property owners and educational institutions to identify, register, and conserve cultural and heritage resources.</li> <li>• <b>Section 5.4, Policy 5.11</b> provides direction to collaborate with various diverse cultural groups to identify, explore incentives to encourage preservation and expansion of built heritage, and the development of cultural spaces.</li> </ul>

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	<ul style="list-style-type: none"> <li>• <b>Section 6.2, Policy 6.4</b> provides direction to work with a wide range of community and private sector stakeholders to maintain and increase the number of affordable non-market housing.</li> <li>• <b>Section 6.5, Policies 6.6 and 6.7</b> provide direction to support additional community planning in specific neighbourhoods, including service needs and public realm improvements.</li> <li>• <b>Section 7.2, Policy 7.3</b> provides direction to prioritize investments in the public realm and connectivity in areas with concentrations of businesses and institutions.</li> <li>• <b>Section 7.2, Policy 7.4</b> provides direction to work with other levels of government and large institutions to maintain and expand employment in the Regional Centre and create synergies between key economic sectors.</li> <li>• <b>Section 8.3, Policy 8.6</b> provides direction to continue to invest in improvements to the safety and convenience of pedestrians through various means</li> <li>• <b>Section 8.3, Policy 8.7</b> provides direction to establish public street connections to achieve strategic growth objectives of the Plan, to complete street grid connections, and improve pedestrian access to transit and other destinations.</li> <li>• <b>Section 8.5, Policy 8.8</b> provides direction to consider the Plan when updating Transit Priority Plan.</li> </ul>
<p><i>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.</i></p>	<p>Staff offers the following rationale in support of this recommendation. Policies and regulations were developed based on public and stakeholder input, character and technical studies, and recommendations from CDAC. A framework was developed that balances transitioning large-scale dense development down to low-rise residential development with optimizing development potential in the Regional Centre. An Urban Transect is embedded in the Urban Structure framework, which focuses growth in the Downtown and Centres, and tapers towards Corridors and residential areas.</p> <p>The current system of stacked zoning that exists in parts of the Regional Centre no longer aligns with the strategic and predictable growth desired in the Regional Centre. As such, the proposed Plan necessitates changes to development regulations and requires allocation of growth to locations served by transit and other services. Refer to the following:</p> <ul style="list-style-type: none"> <li>• <b>Figure 1</b> includes the Regional Centre Urban System of Community Nodes and Mobility Links.</li> <li>• <b>Table 2</b> includes the framework for Maximum FAR and Maximums Heights in Designation and Zones</li> </ul>

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<p><i>Recommendation Four: In partnership, with industry and design professionals, develop site specific case studies to test the framework and build confidence in its applicability.</i></p>	<p>In support of this recommendation, staff engaged and consulted in both individual meetings and group workshops with the development and design community. Staff also conducted extensive and ongoing modelling of proposed regulations on specific sites since the start of the project, which informed the evolution of proposed regulations.</p> <p>It is important to note that as part of the consultation and partnership processes, individual stakeholders also modeled draft regulations on sites throughout the Regional Centre and shared their findings with staff throughout this process. All feedback received during the extensive community engagement process for Package A was considered in detail and resulted to extensive changes and added flexibility in land use by-law and design requirements to address local context and site-specific requirements. The most recent stakeholder presentations since the Plan’s release were received positively.</p>
<p><b>Municipal Responsibilities and Obligations:</b></p> <p><i>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.</i></p>	
<p><b>Recommendation</b></p>	<p><b>Response</b></p>
<p><i>Recommendation Five: Identify municipal obligations and a process for developing required Infrastructure Plans that will ensure new growth can be accommodated without undue burden</i></p>	<p>In support of this recommendation, staff identified key municipal initiatives to support the Plan, as well as opportunities for collaboration with other levels of government. The staff report further outlines financial implications of adopting the Centre Plan, including key initiatives. Those opportunities have been implemented through the following Plan language and policies.</p> <p>For example, staff worked closely with Halifax Regional Water Commission (Halifax Water) on the 2016 Regional Centre Local Wastewater Servicing Capacity Analysis (LoWSCA) study. This study was commissioned by the Halifax Water to support a wastewater servicing master plan for regional infrastructure to support existing and future growth areas in the Municipality. The study highlighted servicing and infrastructure issues occurring within the Regional Centre, and reviewed servicing capacity at 6 key sites to determine whether upgrades are required to accommodate future development. Those sites subject to the study were: Quinpool Road, Spring Garden, Young Street,</p>

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	<p>Agricola and Gottingen Street, Canal Street, and Wyse Road. The project was concluded in June 2016 and informed the Centre Plan process, Urban Structure framework, and Halifax Water strategic and capital plans. Currently, Halifax Water is actively pursuing, and has been successful, in securing federal funding to invest in aging infrastructure.</p> <p>Staff is also working on a report that will rationalize development fees in the Municipality, including the Regional Centre, which will be presented to Regional Council in the near future. In addition, the following policies address municipal initiatives:</p> <ul style="list-style-type: none"><li>• <b>Section 8.1, Policy 8.3</b> provides direction to implement a Transportation Reserve over lands within Dartmouth Cove Future Growth Node.</li><li>• <b>Section 8.5, Policies 8.9 8.10</b> provides direction to support improvements to transportation systems to facilitate efficient movement of goods, and to use strategic partnerships.</li><li>• <b>Section 9.4, Policy 9.7</b> provide direction to consider the Plan’s Urban Structure and growth patterns when reviewing priority plan reviews and master planning to parks, open spaces, trails, facilities, and amenities within parks to consider matters such as health, well-being and sense of community. This includes consideration of a new Open Space Plan for the Regional Centre.</li><li>• <b>Section 10.8, Policies 10.19-10.23</b> provide direction related to future investments to support the goals of the Plan. This includes, parks, facilities, streets and streetscaping programs, heritage incentives programs, urban design and placemaking programs, and studies to determine the adequacy of public water, wastewater or stormwater systems to accommodate growth projected in this Plan.</li><li>• <b>Section 10.9, Policy 10.24</b> provides direction for Council to consider one or more commercial development districts.</li></ul>
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<p><i>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’.</i></p>	<p>In support of this recommendation, staff offer the following rationale:</p> <p>The Plan includes a policy intent to support the Plan through initiatives related to parks, facilities, transportation infrastructure, housing, heritage, and infrastructure services among others (please see response to Recommendation Five).</p> <p>As indicated in the staff report, recent capital projects included a significant number of projects in the Regional Centre. The Municipality has adopted strategic plans, which are better equipped to identify capital and operating projects. As specified in the Financial Implications section of the <a href="#">staff report</a>, dated April 3, 2019:</p> <p><i>Section 232(2) of the HRM Charter states that the adoption of a municipal planning strategy does not commit the Council to undertake any of the projects suggested in it. Also, such amendments and adoption processes are at the discretion of Regional Council and are not subject to appeal to the Nova Scotia Utility and Review Board.</i></p>
<p><i>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.</i></p>	<p>In support of this recommendation, staff offer the following rationale:</p> <p>Various HRM business units have been involved at each stage of the Plan’s development process, and there is a strong organizational buy-in and support for the Plan as it is aligned with the Regional Plan and other strategic plans. During and following adoption of the Plan, continued communication and support between departments will ensure that each department can plan for and incorporate the various actions in its business plans; Council and senior administration can continue to request reporting on the Plan.</p>
<p><b>Height and Density:</b></p> <p><i>It is unclear as to what the basis of the rationale is for the heights and densities proposed in the built form framework.</i></p>	
<p><b>Recommendation</b></p>	<p><b>Response</b></p>
<p><i>Recommendation Eight: Identify an appropriate rationale and framework for height and density. Ensure Plan does not unnecessarily downzone sites.</i></p>	<p>In support of this recommendation, staff offer the following rationale:</p> <p>Maximum heights and Floor Area Ratios (FAR) were determined based on regional and local levels based on the 2017 Centre Plan Framework document, character and technical studies, local modeling, input from the public and stakeholders, existing land use and zoning. A framework was developed that balances transitioning large-scale dense development down to low-rise residential development as well as an overall urban transect that concentrates development in the Downtown and Centres, followed by other designations.</p>

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	<p>While in many of cases exiting zoning rights were maintained or increased, the stacked zoning system that exists in parts of the Regional Centre did not always provide for clear and predictable property right and urban form. Some examples of ways in which the framework is rationalized in the Plan include:</p> <ul style="list-style-type: none"> <li>• Urban Structure, Downtown Precinct and Centre Descriptions (Part 3)</li> <li>• Corridor Characteristics (Table 1)</li> <li>• Regional Centre Urban System of Community Nodes and Mobility Links (Figure 1)</li> <li>• Building Design (Part 4, Section 4.7)</li> <li>• Maximum Floor Area Ratios (FAR) and Maximum Heights in Designation and Zones (Table 2)</li> <li>• Planning policies related to registered heritage properties and proposed Heritage Conservation Districts (Policy 5.5 and Policy 5.6)</li> <li>• Regional Centre Cultural Landscapes (Table 4)</li> </ul>
<p><b>Neighbourhood Level Analysis:</b></p> <p><i>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.</i></p>	
<p><b>Recommendation</b></p>	<p><b>Response</b></p>
<p><i>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</i></p>	<p>Area specific analysis to create specific policies, and regulations that support the character of different areas has been an integral part of the Centre Plan Process. Opportunities to enhance the unique character the Regional Centres Neighborhoods have been identified in the Plan, and implemented through the following examples of planning policies:</p> <ul style="list-style-type: none"> <li>• Introduction, Regional Centre Urban System of Community Nodes and Mobility Links (Figure 1)</li> <li>• Urban Structure, Downtown Precinct and Centre Descriptions and associated policies (Part 3)</li> <li>• Corridor Characteristics and associated policies (Table 1)</li> <li>• Building Design (Part 4, Section 4.7)</li> <li>• Maximum Floor Area Ratios (FAR) and Maximum Heights in Designation and Zones (Table 2)</li> </ul>

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	<ul style="list-style-type: none"> <li>• Planning policies related to registered heritage properties and proposed Heritage Conservation Districts (Policy 5.5 and Policy 5.6) Regional Centre Cultural Landscapes (Table 4)</li> <li>• Neighbourhood Planning (Part 6, Section 6.5, Policy 6.6)</li> <li>• Heritage Properties, Heritage Conservation Districts, and Cultural Landscapes (Part 5, Section 5.2)</li> <li>• Future Growth Nodes, and Site-Specific Comprehensive Development District (CDD) Development Agreement Criteria (Section 3.6 and Section 3.6.3)</li> </ul>
<p><b>Level the Playing Field:</b></p> <p><i>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.</i></p>	
<p><b>Recommendation</b></p>	<p><b>Response</b></p>
<p><i>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.</i></p>	<p>In support of this recommendation, staff offer the following rationale:</p> <p>Following adoption of the full Centre Plan, inclusive of Packages A and B, work will commence to update and simplify the remaining Municipal Planning Strategies and By-laws in HRM. These efforts could include additional design standards like those found in the Regional Centre. It is important to note that projects approved recently (e.g. Seton Ridge) incorporate design criteria/regulations. In addition, current planning project in the Bedford Highway Corridor are also initiated to update planning regulations.</p> <p>While density bonusing has recently been enabled outside of the Regional Centre, <i>HRM Charter</i> amendments will be necessary to enable site plan approval for the external appearance of structures outside of the Regional Centre.</p>

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<b>Planning for parks, open spaces and the ecology of the city:</b>	
<i>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.</i>	
<b>Recommendation</b>	<b>Response</b>
<i>Recommendation Eleven: Prepare and embed a detailed parks, open space and city ecology plan into Centre Plan’s policies, by-laws and design guidelines.</i>	<p>Detailed policies related to the Parks and Open Space designation are part of Package B.</p> <p>In support of this recommendation, Part 9 of the Package A Plan on Environment includes policies related to environmental protection, urban lakes and watercourses, urban agriculture, and the parks and open space network, which is guided by the HRM Green Network Plan.</p> <p>Stormwater management is a key consideration in the development of Future Growth Nodes, in landscaping requirements, and in the management of municipal parks and properties. For example, the Land Use By-law regulations and design regulations include detailed provisions for open space planning, landscaping, and green roofs.</p>
<b>Recognizing neighbourhood needs:</b>	
<i>Creating Complete Communities requires a commitment from the private sector, the Municipality and the Province.</i>	
<b>Recommendation</b>	<b>Response</b>
<i>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.</i>	<p>In support of this recommendation, staff offers the following rationale:</p> <p>This recommendation focuses on and highlights the importance of neighbourhood planning and placemaking in defining a character of a place. These processes will be undertaken in further details during the community and stakeholder consultation of Package B.</p> <p>As for the proposed planning policies and by-law regulations, the overall Urban Structure framework was based on detailed analysis of existing community and commercial nodes, services and facilities. In addition, two studies were completed that focus on local community-level indicators, and lot and block typology.</p> <p>Furthermore, to address to recommendation, staff has taken interim measures to address the development pressure on registered heritage properties in the Regional Centre (Package A) lands. Those sites were identified to determine the appropriate maximum heights and FARs for future developments. In addition, future Heritage Conservation Districts (HCDs) were identified on Map 10</p>

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	<p>of the Plan, which include a total of 9 districts. Those areas contain a significant density of buildings that score high in this analysis that was based on:</p> <ul style="list-style-type: none"> <li>• Character study analysis (HRM, 2017) evaluated buildings in the Regional Centre by age, architectural integrity, architectural typology and condition.</li> <li>• List of significant and intact historic neighbourhoods (Heritage Trust, 2015)</li> </ul> <p>Where these areas intersected with areas supported by other analysis, they were included HCD boundaries encompass areas with a high density of historic, registered or landmark properties from a particular period in the municipality’s history.</p> <p>Boundaries were delineated to include as many significant buildings for these areas as possible, with the intention that during the creation of a background study in support of initiating these HCDs, the boundary may be adjusted. The intention is to minimize development pressure in these historic areas until new planning rules for the heritage districts can be created.</p> <p>While the Municipality does not provide services such as daycares, all Package A zones permit a range of commercial uses based on the local context. Given the relatively small area of the Regional Centre, most neighbourhoods are within a 5-15 min walk of a Downtown, Centre or Corridor.</p>
<p><b>Culture and Heritage:</b></p> <p><i>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 places, the cultural and built heritage will be better enhanced, protected and advanced.</i></p>	
<p><b>Recommendation</b></p>	<p><b>Response</b></p>
<p><i>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.</i></p> <p><i>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.</i></p>	<p>The Regional Centre is the most urban and densely populated part of the Municipality, with rich and diverse history. As such, narrating the stories and events that influenced land use planning and development over the past 70 years is important.</p> <p>This recommendation is addressed by including details to the proposed Plan relating to the evolution of the Regional Centre, starting with acknowledgments of the original inhabitants of the area, the Mi’kmaq First Nations. In recent years, Council passed a Statement of Reconciliation with Aboriginal People, and the long presence and contributions of the Mi’kmaq are being recognized. In addition, the Plan highlights and recognizes the impacts of Urban Renewal projects in 1960s that resulted in demolishing the African-Nova Scotian community of Africville and displacing its residents.</p>

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	<p>The Plan also includes narrative that touches on the history of the Regional Centre as a point of entry and often the ultimate home for waves of settlers and immigrants, including: The Loyalists, the Maroons and other Black Refugees, the Quaker whalers, Scottish and Irish stonemasons, the Lebanese, Kosovar and Syrian refugees, and many more who have left their unique mark on the Regional Centre. Details are included in the following parts of the Plan:</p> <ul style="list-style-type: none"><li>• <b>Section 1.0 - Regional Centre Context</b> provides details that influence planning and development over the past 70 years.</li><li>• <b>Section 1.1 - Regional Centre Today</b> provides details relating to many major features, First Nation lands, and public lands and institutions.</li><li>• <b>Section 1.2.1 – Strengths</b> provides a list of topics highlighted as strengths and opportunities, including parks and open space, cultural and heritage, public institutions, waterfront, connectivity, and development.</li></ul> <p>The Plan also acknowledges that the Regional Centre is composed of distinctive communities that evolved over thousands of years of use and settlement. Culture and heritage policies, detailed in Part 5 of the Plan, balance the need to accommodate growth with the preservation of significant cultural and heritage assets. Cultural policies must also promote living heritage which includes the traditions, memories, experiences, objects, and places recognized for creating a sense of community.</p> <ul style="list-style-type: none"><li>• <b>Section 5.4 – Culture (Policies 5.7 - 5.11)</b> provide direction to support and encourage vibrant, diverse, and inclusive cultural assets and ways to celebrate culture in the Regional Centre.</li></ul>
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<p><i>Recommendation Fourteen: Develop a strategy to expedite the creation of Heritage Conservation Districts.</i></p>	<p>In support of this recommendation, opportunities to create Heritage Conservation Districts can be found in the following areas and are implemented through the following policies:</p> <ul style="list-style-type: none"> <li>• <b>Part 5 - Section 5.2</b> includes details relating to Heritage Properties, Heritage Conservation Districts, and Cultural Landscapes</li> <li>• <b>Part 5. Policies 5.4, 5.6, and 5.7</b> provide policy support for Council to consider the proposed HCDs, while immediately lowering development pressures in those areas.</li> </ul> <p>As specified in the Financial Implications section of the <a href="#">staff report</a>, dated April 3, 2019:</p> <p><i>“The completion of proposed programs and projects to support anticipated growth, and the nine proposed Heritage Conservation Districts (HCDs) within an accelerated timeframe would require either a re-allocation of staff resources, or new staff resources. Options and recommendations for any financial incentives, streetscape and signage associated with any new HCDs will be brought forward to Halifax Regional Council as separate reports for consideration. It is estimated that there are 2,500 properties within the proposed HCDs. A separate staff report will outline a proposed process for the establishment of HCDs.”</i></p>
<p><i>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.</i></p>	<p>Staff agree that Halifax is a city of heritage, and to this heritage policies have been strengthened in the revised planning documents as outlined in response to recommendation Fourteen. In addition, the Financial Implications section of the April 2, 2019 <a href="#">staff report</a> states the following:</p> <p><i>The completion of proposed programs and projects to support anticipated growth, and the nine proposed Heritage Conservation Districts (HCDs) within an accelerated timeframe would require either a re-allocation of staff resources, or new staff resources. Options and recommendations for any financial incentives, streetscape and signage associated with any new HCDs will be brought forward to Halifax Regional Council as separate reports for consideration. It is estimated that there are 2,500 properties within the proposed HCDs. A separate staff report will outline a proposed process for the establishment of HCDs.</i></p>

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<b>Housing:</b>	
<i>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.</i>	
<b>Recommendation</b>	<b>Response</b>
<p><i>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.</i></p> <p><i>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.</i></p>	<p>Housing affordability was consistently raised as an important issue in all Centre Plan consultations and requires a multi-pronged and multi-stakeholder strategy. HRM continues to address the problems of homelessness and housing affordability through a number of housing groups, including the Housing and Homelessness Partnership and the Affordable Housing Workplan approved by Council. Staff will return with an administrative program to disperse any funds collected through bonus zoning.</p> <p>The Centre Plan addresses affordability through bonus zoning considerations which can leverage other sources of funding, and by permitting, encouraging and requiring a variety of housing forms. For example, a wide range of housing types including shared housing are permitted in all zones. Additionally, the Plan will encourage housing supply in the Regional Centre to increase, thereby putting downward pressure on the cost of renting and owning a home. In addition, <b>Section 6.2, Policy 6.4</b> identifies municipal tools to support affordable and non-market housing goals.</p> <p>The April 3, 2019 Centre Plan <a href="#">staff report</a> includes the following summary of housing policies and their link the Affordable Housing Workplan approved by Council:</p> <p><i>“Part 6 of the Plan sets out overall land use policies for increasing the variety and accessibility of housing choices throughout the Regional Centre, by permitting a broad range of housing and built forms in all residential zones including secondary suites and backyard suites for low-density buildings, and shared housing. The Plan also requires a mix of unit types in high density dwellings, but does not impose a minimum unit size. As required by the HRM Charter, an affordable housing component is required in all incentive or bonus zoning, and the majority (60%) of public benefits is proposed to be directed to affordable housing as money-in-lieu contributions, which can be leveraged through other funding sources. The proposed policy directions and regulations, including ongoing support for any future incentives and partnerships related to housing, directly align with the Municipal Affordable Housing Workplan, and are informed by the 2015 Halifax Housing Needs Assessment (see Summary of Research - Attachment M). The Plan also proposes additional community planning engagement in the Dartmouth North and Peninsula North neighbourhoods”.</i></p>

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<p><b>Mobility:</b></p> <p><i>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.</i></p>	
<p><b>Recommendation</b></p>	<p><b>Response</b></p>
<p><i>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.</i></p>	<p>In support of this recommendation, Regional Centres Neighborhoods were identified and specific approaches to development on different types of streets have been implemented through identification of Pedestrian Oriented Commercial Streets, Special Areas (e.g. Agricola Street and Portland Street), detailed design requirements (including heritage conservation design requirements in Part VI of the Land Use By-law), and 9 proposed Heritage Conservation Districts. Detailed local architectural requirements were not part of the scope of the Plan but will be developed as part of the creation of Heritage Conservation Districts. In addition, <b>Policies 8.6 and 10.19</b> identify Pedestrian Oriented Commercial Streets and Corridors as priorities for streetscaping improvements.</p> <p>The P&amp;D Strategic Transportation streetscaping program has a mandate for ongoing street improvements, including the recent approval of a new design for Spring Garden Road. The Active Transportation Plan and the Integrated Mobility Plan already identify strategic projects in the Regional Centre.</p>
<p><i>Recommendation Eighteen: Identify the strategy for expediting the creation of cycling facilities throughout the Regional Centre.</i></p>	<p>Investments in cycling facilities are important to the success of the Plan. Opportunities to expedite the creation of cycling facilities in the Regional Centres have been identified in the following areas and implemented through the following policies:</p> <ul style="list-style-type: none"> <li>• <b>Section 8.3</b> Pedestrian and Cyclist Safety and Comfort, Policy 8.6.</li> </ul> <p>The detailed implementation of such programs is directed by the Active Transportation Plan and the Integrated Mobility Plan.</p>

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<p><b>Public Art:</b></p> <p><i>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.</i></p>	
<p><b>Recommendation</b></p>	<p><b>Response</b></p>
<p><i>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.</i></p>	<p>The HRM Public Art Policy is currently being reviewed. The Municipality already directs 1% of municipal project costs to public art, but a similar charge on private projects is not currently enabled by the HRM Charter. Bonus zoning policies allow for up to 40% of public benefits to both on-site and money-in-lieu contributions to public art. Council will provide staff with direction on the allocation of funds collected through the bonus zoning fund in relation to public art.</p>
<p><b>Balancing Certainty and Flexibility:</b></p> <p><i>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.</i></p>	
<p><b>Recommendation</b></p>	<p><b>Response</b></p>
<p><i>Recommendation Twenty: Re-evaluate 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.</i></p>	<p>In support of tis recommendation, the Plan and Land Use By-law are shifting development approval processes from development agreements to site plan approval processes, which have been effective in stimulating the revitalization of Downtown Halifax.</p> <p>By updating and modernizing planning policies and regulations, Centre Plan will reduce the need for lengthy plan and by-law amendment applications. The Plan also includes different categories for development review, including development permit review and three levels of site plan approval review based on the size of the proposal. Certain exemptions are also allowed. Extensive staff training and process improvements within various P&amp;D teams is part of the implementation and transition to the proposed Plan. The Centre Plan team will be training development review staff on the administration of the plan to ensure that development applications proceed smoothly, and approval and permits are issued within service standards.</p>

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<p><i>Recommendation Twenty-One: Default to overarching intent of each chapter, not to the minutiae of the regulations.</i></p>	<p>This is a valid recommendation, however under the HRM Charter legislative context, the purpose of a municipal planning strategy is to provide vision and policy objectives, and to enable specific land use by-law regulations. Staff believe the Plan strikes a balance between legislative requirements and articulating the intent and aspirational aspects of each chapter.</p>
<p><b>Planning beyond the 2031 horizon:</b></p> <p><i>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?</i></p>	
<p><b>Recommendation</b></p>	<p><b>Response</b></p>
<p><i>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.</i></p>	<p>The proposed Centre Plan is designed to accommodate up to 40% of all growth in HRM within the Regional Centre. It is intended to be updated every 10 years or as directed by Council, but there is no sunset date. HRM will continue to monitor population and development growth, and will adjust the Centre Plan as required. By providing for a wide range of uses and building forms the plan allows various forms of development to take place over time. This allows development in the Regional Centre to respond to market demand, shifts in demographics and other factors.</p>
<p><b>Achieving Plan’s Growth Targets:</b></p> <p><i>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.</i></p> <p><i>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.</i></p>	
<p><b>Recommendation</b></p>	<p><b>Response</b></p>
<p><i>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.</i></p>	<p>The proposed urban structure framework provides for additional growth flexibility through land use permissions in various parts of the Regional Centre. While there are numerous assumptions and factors at play in projecting land inventory in the quickly changing development context, the addition of new lands to Package A, the removal of maximum heights (except for an overall 90 m height limit) in areas governed by FAR, and other changes to land use and built form regulations, staff is confident that the proposed Plan provides ample supply of developable land.</p>

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<b>Closing the gap between HRM’s existing plans:</b>	
<i>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.</i>	
<b>Recommendation</b>	<b>Response</b>
<i>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.</i>	<p>In support of this recommendation, the Plan has strengthened connections with functional plans such as the Integrated Mobility Plan, the Green Network Plan, and the Halifax Growth Plan. Figure 1 indicates key nodes and transportation links, which align with IMP’s transit-oriented communities, existing or proposed transit corridors. The Plan focuses growth along existing and future transit corridors and has a strong emphasis on mixed uses to promote walkability and transit use.</p> <p>The Plan promotes complete streets by placing an emphasis on human scale design, adding density and a mixing of uses throughout the Regional Centre, and by encouraging a fine-grained urban environment through design requirements</p>
<b>Economic Development:</b>	
<i>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.</i>	
<b>Recommendation</b>	<b>Response</b>
<i>Recommendation Twenty-Five: Develop a comprehensive, data driven analysis of economic development opportunities. Collaborate with key partners to facilitate and incentivize growth.</i>	<p>In support of this recommendation, the Plan is aligned with the Halifax Growth Plan, and <b>Part 7 Economic Development</b> includes concrete policies to enable land use permissions and strategic partnerships to foster ongoing economic development. The planning framework, which includes provisions for mixed-use zoning, diverse housing options, clear development rights, public realm improvements, human scale developments, clustering of jobs and housing that support innovation districts, and protection of cultural and heritage resources are some of the ways in which the Plan supports growth, economic development and liveability in the Regional Centre.</p> <p>Package B will further address employment and economic development by maintaining a robust inventory of industrial and institutional lands. Staff believe that the proposed Plan appropriately supports broader economic development policies as contained in the Regional Plan and the Halifax Growth Plan.</p>

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<p><b>Devil's in the Details:</b></p> <p><i>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.</i></p>	
<p><b>Recommendation</b></p>	<p><b>Response</b></p>
<p><i>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.</i></p>	<p>Testing of the proposed policies and regulations was an important part of developing the Plan. Since Package A was released in February of 2018, staff worked closely with the development community, designers, consulting planners, and other professionals to model potential regulations on specific sites throughout the length of the project. The development and design community were consulted and engaged in meetings and workshops that included modeling of case studies. Their input has significantly informed the proposed policies and regulations. Stakeholders also independently modeled draft regulations on sites and shared their findings with staff throughout this process. Feedback based on the April draft of the Plan was well-received by various stakeholder groups as indicated that much of the feedback was incorporated in the revised documents.</p>
<p><b>Environment:</b></p> <p><i>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.</i></p>	
<p><b>Recommendation</b></p>	<p><b>Response</b></p>
<p><i>Recommendation Twenty-Seven: Consistent with 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.</i></p>	<p>Urban Forest is a key component of the Regional Centre. In support of this recommendation, the following policies address porous surfaces and support the Urban Forest Master Plan:</p> <ul style="list-style-type: none"> <li>• <b>Section 3.6.1, Policy 3.30</b>, direction for Future Growth Node master planning to address on-site storm water management including green stormwater infrastructure and preservation of environmental features;</li> <li>• <b>Section 3.6.3 Site Specific CDD Development Agreement Requirements</b> include provisions for open spaces, landscaping and the use of porous surface materials.</li> <li>• <b>Section 6.6.1 Landscaping, Policy 4.12</b> directs land use by-law to establish landscaping requirements which includes requiring trees and landscaping, and requirements to regulate stormwater run-off and improve the filtration of the run-off.</li> <li>• <b>Section 4.8, Parking and Driveways Policy 4.21</b> enables porous surface materials in the construction of parking and driveways.</li> </ul>

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	<ul style="list-style-type: none"> <li>• <b>Section 9.2, Policy 4.5</b> intent to include Low Impact Development technologies in municipal capital projects and in planning and maintenance of parks and open spaces, encourage watercourse daylighting and partnership to improve water quality in lakes and watersheds.</li> </ul> <p>Other incentives may be considered through stormwater management policies currently being developed by HRM staff.</p>
<p><i>Recommendation Twenty-Eight: Consistent with Urban Forest Master Plan, develop recommendations related to protecting and enhancing the tree canopy.</i></p>	<p>Urban Forest is a key component of the Regional Centre. The Urban Forest Master Plan provides a robust framework by which to manage HRM’s urban Forest, including in the Regional Centre. Opportunities to protect and enhance the tree canopy have been identified in the following areas and implemented through the following examples of policies:</p> <p><b>Policy 3.35 (e) ii.</b> Provides for a greenway wide enough to accommodate tree planting</p> <p><b>Policy 4.12 (b)</b> Requires buffers between different built forms. The Land Use By-law requires that trees be planted in most of these buffers.</p> <p><b>Section 6.5, Policy 6.6 (f)</b> Provides opportunities to engage communities in landscaping and tree planting.</p> <p><b>3.6.4.4 Dartmouth Cove Lands:</b> Policy 3.37 (f) landscaping and tree planning to achieve the goals of the Urban Forest Master Plan.</p> <p><b>Section 9.1, Policy 9.2</b> intent to consider acquisition of riparian buffers as public open space where development is considered by development agreement;</p> <p><b>Section 9.2 Urban Lakes and Watercourses Policy 9.5</b> intent to increase tree canopy to manage storm water in highly impervious areas.</p>