



October 10th, 2025

Eleanor Fierlbeck
Planner II – Regional & Community Planning
Planning & Development
Halifax Regional Municipality

Re: North End Community Health Centre – Regional Centre Land Use By-law Amendment (PLANAPP-2025-02245)

Dear Eleanor,

I am writing to outline the need for an amendment to the Regional Centre Land Use By-law to better support the development and operation of Community Health Centres within the Regional Centre. The requested amendment includes two key components:

1. the creation of a specific definition for Community Health Centres;
and
2. the removal of minimum parking requirements for this use.

These two items are explained in more detail below, followed by a discussion of supporting policy direction under the Regional Centre Secondary Municipal Planning Strategy (SMPS).

Community Health Centre Definition:

Currently, the Regional Centre Land Use By-law does not have a definition for a Community Health Centre, and as a result, this important institutional use is categorized and regulated as a Medical Clinic Use¹. While this definition encompasses some services provided by a Community Health

¹*Medical Clinic Use means premises used for the medical examination and treatment of patients on an outpatient basis, for purposes such as family medicine, primary health care, walk-in clinic, dentistry, optometry, podiatry, nutritional counselling, psychiatry, psychological counselling, crisis intervention, physiotherapy, chiropractic, osteopathy, harm reduction, massage therapy, and other similar uses. - Regional Centre Land Use By-law, Section 499(152)*

Centre, it does not capture the full range of programming these centres deliver.

Community health centres provide a broad range of non-medical services such as housing assistance, food access, and legal support, alongside health promotion and clinical care, with a particular focus on serving marginalized and underserved communities. However, the lack of a specific definition for this holistic model of community health promotion has already presented limitations for the North End Community Health Centre (NECHC). During development permit application DEVONLY-2025-11745, the absence of a clear definition has prohibited the provision of legal aid services to at-risk populations. There is additional concern that relying on the Medical Clinic definition may present other yet unforeseen barriers to the comprehensive delivery of community-based services by community health centres.

To address this, we are requesting that a new specific definition for a Community Health Centre use be added to the Regional Centre Land Use By-law.

Parking Requirements

We further request that community health centres not be subject to minimum parking requirements in the HR-1 and HR-2 zones for the following reasons:

- a) Many community members who access these services rely primarily on active or public transportation,
- b) Requiring on-site vehicle parking creates unnecessary barriers,
- c) Other land uses in these zones, including university or college, office, financial institution, restaurant, drinking establishment, work-live unit, home occupation, and residential uses, are not subject to minimum parking requirements.

While surface parking can be relatively easily provided on sites with excess lot area, on in-fill sites such as 2445 Brunswick Street (future NECHC site), underground parking is the only feasible option. Altus Group's 2024 Cost Guide estimates underground parking construction in Halifax at up to \$200 per square foot, representing a prohibitive cost and a significant barrier to project feasibility.

Policy Support

The Regional Centre SMPS provides policy direction for a wide range of institutional uses within the Higher Order Residential Designation:

- **HO-1** directs that the HR-2 Zone permit multi-unit dwellings as well as a range of compatible commercial and institutional uses.
- **HO-1(b)** directs that the HR-1 Zone permit all residential uses and a limited range of commercial and institutional uses compatible with adjacent low-rise areas.

A Community Health Centre, which provides many of the same services as a Medical Clinic but with a broader focus on social determinants of health, is equally appropriate in these neighbourhood contexts.

Section 3.8 of the SMPS also establishes objectives to encourage active transportation and reduce reliance on motor vehicles, in part by reducing or eliminating minimum parking requirements. Requiring no minimum number of spaces for Community Health Centres would be consistent with this direction and with recent amendments to the Regional Centre LUB.

Conclusion

In conclusion, we request amendments to Table 1A, Table 15, and Section 499 of the Regional Centre Land Use By-law to:

1. Add a new definition for Community Health Centre;
2. Permit this use in the HR-1 and HR-2 zones; and
3. Apply no minimum parking requirements for this use.

These changes will provide clarity for the categorization of Community Health Centres, eliminate unnecessary regulatory barriers, and better align the Land Use By-law with the policy objectives of the Regional Centre SMPS.

Yours very truly,

Fowler Bauld & Mitchell Ltd.



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