



January 22st, 2019

HRM Planning Services
PO Box 1749
Halifax, NS B3J 3A5

Attn: Jesse Morton

Case 22050 - Application to amend the Halifax Municipal Planning Strategy and Halifax Mainland Land Use By-law to permit the proposed residential development at PID 00277228.

Dear Jesse,

Please accept this letter as supplementary to the original application provided earlier in the fall. We are providing additional analysis and information to assist HRM in its evaluation of the proposal, and is a companion to the accompanying letter from RMP Consulting.

This letter addresses the following:

- Housing Affordability
- Policy Change: As-of right versus development agreement

1. Housing Affordability

The Halifax Charter establishes a Provincial Statement of Interest on Housing, which states, in part:

Depending upon the community and the housing supply and need, the measures that should be considered in planning documents include: enabling higher densities, smaller lot sizes and reduced yard requirements that encourage a range of housing types.



The need for affordable housing is supported by the study¹ conducted in 2015 by HRM which stated:

Average house prices in the Municipality have steadily increased from 2007 to 2014 and this trend is expected to continue. House prices saw an average year-over-year increase of 3.7% compared to the consumer price index which shows an average increase of 1.7% from 2007 to 2014. The average sale price of existing homes (more than half of which are single detached homes) in 2014 was \$279,294 while the average for new homes was \$375,847.

The recent Census data further supports the need for affordable housing, both market and non-market, in Halifax. Core housing need in Halifax is above the national average according to the census data from 2016.² Core housing need is defined by Stats Canada as, "...one whose dwelling is considered unsuitable, inadequate or unaffordable and whose income levels are such that they could not afford alternative suitable and adequate housing in their community".

By providing smaller houses on smaller lots costs will be reduced for the homeowner, both in terms of initial purchase price but also in maintenance costs and property taxes. By allowing more flexibility in lot coverage and setbacks, developers can create more dense residential forms that allow additional entrants into the housing market.

2. Policy Change – As of right development

In our original submission, we suggested that a policy to allow for a RCDD is in keeping with the existing policies and is well supported by other HRM studies. However, we understand that HRM is looking to reduce its administrative burden and move toward as-of-right development as much as possible. If HRM wishes to do this, then the following approach may be useful.

To accommodate the proposed development, HRM could create a new subzone in both the R-1 and R2T zones that include reduced lot provisions. In the R-1 zone, these provisions would allow for smaller lots and homes, thereby encouraging more housing affordability. In the accompanying letter, RMP Consulting outlines the lot requirements for the proposed development. The following chart compares these requirements with the existing lot provisions.

¹ Halifax Housing Needs Assessment Final Report 2015

² <https://www12.statcan.gc.ca/census-recensement/2016/dp-pd/chn-biml/index-eng.cfm>



Proposed alterations to R-1 provisions if as-of-right option is chosen

R-1 Lot Provisions	Existing provisions in LUB	Proposed to accommodate this development
Minimum lot frontage	50 feet	34 feet
Minimum lot area	5000 square feet	3400 square feet
Maximum lot coverage	35 %	40%

The proposed development also includes an area of townhouses, which is generally consistent with the existing zoning R-2T provisions in the LUB. The only requested change to this zone would be a reduction of 10% in the minimum lot area from 1800 sq. feet per townhouse plus an additional 2000 feet to a lot area of 1615 square feet per unit.

Other than the minimum lot area, the proposed lot configuration in the R2 zone will meet existing land use bylaw regulations.

Summary:

The proposed lot configuration does vary from existing lot provision standards. However, given the SPI on Housing, recent studies completed by HRM, the 2016 census data and the general trend in municipal planning to provide increased flexibility to encourage innovative and affordable subdivision development, these changes are reasonable.

The requested changes to the zoning provisions, if HRM chooses this option, are relatively minor in nature, requiring a 10-20% reduction to the existing lot provisions.

If you have any questions, please feel free to contact me directly.

Sincerely,

Chrystal Fuller, LPP, MCIP

January 2, 2019

HRM Planning Services
PO Box 1749
Halifax NS B3J 3A5

Attention: Jesse Morton

Dear Jesse,

Re: Supplemental and Amending Information for Case 22050: Application to Amend the Halifax Mainland South Secondary Planning Strategy and Land Use By-Law and to Enter in to a Development Agreement to allow the Development of Single Family Dwellings, Two-Family Dwellings and Townhouses.

On behalf of our client FH Development Group Inc, we have requested an amendment to the Halifax Mainland South Secondary Planning Strategy (MSSPS) for a portion of the lands identified by PID 00277228 at Parkmoor Avenue, Hayes Street and Charlton Avenue Halifax. The requested amendment is to enable residential development on a portion of the lands by development agreement.

The subject property, PID 00277228, is a vacant parcel which has a total area of 27 hectares and 50.5 meters of street frontage. It is designated Urban Settlement in the Regional Plan and portions are designated Residential Development District (RDD) and Low Density Residential (LDR) in the Mainland South Secondary Planning Strategy. The Halifax Mainland Land Use By-Law applies three zones on portions of the property which are noted as R-1 (Single Family Dwelling), R-2 (Two-Family Dwelling) and H (Holding).

To meet market demand and address affordability the application proposes to amend the MSSPS to designate the portion of the lands designated LDR to RDD, amend the Land Use By-Law to rezone from R-1 and R-2 to CDD and enter a development agreement to allow single family lots with minimum frontages/areas of 34ft/3,400sqft, 40ft/40,000sqft and 50ft/50,000sqft, and two family lots with minimum frontages/areas of 50ft/50,000sqft as well as townhouses and parkland as illustrated on the enclosed revised concept plan, issue 2 dated November 14, 2018, and explained in the enclosed planning rationale letter.

The lots illustrated on the concept plan as 50 foot frontage single family and 50 foot frontage semi detached are conforming uses with the current respective zones of R1 and R2 in Land Use By-law for the subject property. The proposal for the remaining portion of the land illustrated on the concept plan as 34 foot frontage single family, 40 foot frontage single family and townhouse would meet the following requirements.

For lots designated on the concept plan as 34 foot frontage:

(a)	Minimum lot frontage	10.36 metres (34 feet) On cul-de-sac bulbs or streets with radius less than 100 metres (328 feet), the frontage requirement may be reduced no more than 20%
(b)	Minimum lot area	315.9 square metres (3,400 square feet)
(c)	Maximum Height	10.67 meters (35 feet)
(d)	Minimum front yard	6.1 metres (20 feet)
(e)	Minimum rear yard	6.1 metres (20 feet).
(f)	Minimum side yard	1.22 metres (4 feet) and no less than 3.65 meters (12 feet) between buildings
(g)	Maximum lot coverage	40%

For lots designated on the concept plan as 40 foot frontage:

(a)	Minimum lot frontage	12.19 metres (40 feet) On cul-de-sac bulbs or streets with radius less than 100 metres (328 feet), the frontage requirement may be reduced no more than 20%
(b)	Minimum lot area	371.61 square metres (4,000 square feet)
(c)	Maximum Height	10.67 meters (35 feet)
(d)	Minimum front yard	6.1 metres (20 feet)
(e)	Minimum rear yard	6.1 metres (20 feet).
(f)	Minimum side yard	1.22 metres (4 feet) and no less than 3.65 meters (12 feet) between buildings
(g)	Maximum lot coverage	40%

For lots designated on the concept plan as townhouse:

(a)	Minimum lot frontage	6.1 metres (20 feet) per unit
(b)	Minimum lot area	150.04 square metres (1,615 square feet) per unit
(c)	Maximum height	10.67 metres (35 feet) per unit



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(d)	Minimum front yard	6.1 metres (20 feet) where parking is provided, in the front yard. This may be reduced to no less than 3.05 metres (10 feet) if parking is located in the building or the rear yard.
(e)	Minimum rear yard	7.62 metres (25 feet). Where parking is located in the rear yard, the minimum rear yard setback shall be 9.14 metres (30 feet).
(f)	Minimum side yard	3.05 metres (10 feet) per block, 0 on common boundary between units
(g)	Maximum number of units per building	5 units
(h)	Minimum Unit Width	5.5 metres (18 feet)
(g)	Maximum lot coverage	40%

As an alternative to the above proposal it would also be acceptable to our Client for an amendment to the Halifax Mainland South Secondary Planning Strategy to create a residential zone for the property that would allow the requested uses. This option may be more desirable for the Municipality as it would reduce the administrative burden of administering a development agreement.

We trust the information provided is sufficient to move forward with the application. Please contact me should you require any additional information or clarification.

Sincerely

RMP Development Consulting Limited

Robert MacPherson, P.Eng.
President

cc Client



October 4th, 2018

HRM Planning Services
PO Box 1749
Halifax, NS B3J 3A5

RE: Planning Analysis regarding application to amend the HMSSPS and LUB and enter into a Development Agreement – Parkmoor Ridge.

As referred to in the cover letter from RMP Development Consulting, FH Development Group Inc. is requesting an amendment to the MSSPS and the rezoning of the subject property (a portion of PID 00277228) to a residential development district (RDD). Concurrent to the Plan amendment and rezoning, the applicant is seeking approval of a development agreement to permit a range of low and medium residential dwellings which will complement the existing neighbourhood and encourage a development form that supports a complete community approach.

1 Planning Designations and Zones

	Current	Proposed
Regional Plan Designation	Urban Settlement	Urban Settlement
MSSPS Designation	RDD and Low Density Residential	RDD for all lands
Zone	R1, R-2 and Holding Zone	All R1 and R2 lands rezoned to a comprehensive development district, a small portion (.8 ha) of the Holding zone to be included in the CDD to provide a passive park
Transit Service Boundary	Within urban transit service boundary. Sub-boundary - suburban	Within urban transit service boundary. Sub-boundary - suburban.

2 Description of the development

The vacant 27-hectare site is bounded to the east by residential and some commercial uses. Although the subject site is designated Low Density Development, lands to the east of Herring Cove Road are designated RDD, and there have been at least two recent instances of upzoning in the immediate area of the development. This demonstrates the market need for “gentle density” and the consistency of the proposed development with what is around it.

The proposed development, named Parkmoor Ridge, will have 270 units, equaling 19.4 people per acres (ppa) based on 3.35 people per unit (ppu). The breakdown of the lots is as follows:

- 202 Single unit dwellings or 75% of units.
- 48 Semi detached dwellings or 18% of units.
- 20 Townhouse units or 7% of units.

An approximately 7 hectare portion of the site is zoned Holding and FH is not seeking any zoning or designation change to this portion of the property. (see attached site plan).

The provision of open spaces in and around this proposed developed is provided through a traditional neighbourhood park. A unique element of this development is the conservation area along the existing watercourse which will provide passive recreational opportunities and a feeling of space and nature within the neighbourhood. Finally, the 0.77 ha passive park will provide additional outside opportunities for the community.

3 Policy Review

The Halifax MPS allows for amendments through policy 7, which requires a Plan amendment for any proposed zoning change that does not conform to the GFLUM. To assist in the evaluation of this Plan amendment application, we are providing an analysis of other relevant policies that may guide Council when considering FH Development's request.

The rezoning of the lands is guided by the policies in the Implementation Section of the Halifax MPS. Of note are the requirements to consider “all relevant policies as

set out in this Plan” and to consider the fiscal capacity of the City to absorb the costs relating to the development and the adequacy of all services.

The Land Development Distribution Strategy is referred to as a criterion for rezoning. However, this document is no longer relevant, and this rational letter does not provide any analysis of this.

As with any Plan Amendment, Council must examine the reasons why a change should occur outside a comprehensive Plan review process. What has occurred to warrant Council allowing a policy change? With the approval of the Integrated Mobility Plan (IMP), Council has set a new course regarding strengthening strategic growth centres to encourage the development of complete neighbourhoods while respecting established ones. I respectfully submit that the existing policies do not fully support this approach, and therefore policy changes are required. The IMP has criteria to evaluate projects, one of which examines if the project supports the design of complete communities. This Plan amendment will allow for project that supports the IMP’s goals, and objectives (see Section 4 for a closer examination of the IMP).

3.1 The Regional Plan Policies

The Regional Plan has designated this property within the Urban Settlement, which encourages growth in serviced areas. Objective 4 provides guidance for how communities are to be designed. These objectives focus on creating “attractive, healthy places to live” near goods and services, facilities and support complete neighbourhoods. Neighbourhood stability, accessibility to all mobility needs and connection with other communities are other stated objectives.

The proposed designation and zoning change will comply to this intent of these objectives by creating low and medium density development that is in proximity to trails, sidewalks, bus routes, recreational and community facilities and retail outlets. Additional analysis is provided later in this letter under the Integrated Mobility Plan analysis.

The Regional Plan also identifies Spryfield as a Regional Local Growth Centre, that encourages a mix of medium to high density residential development, and specifically encourages low to medium density near established residential uses. Transit services and access to AT routes is also envisioned for these types of Growth Centres.

3.2 MSSPS Policies

The General policies of the Halifax MPS are particularly relevant to this application. Policies 2.2, 2.1.2 and 2.4 all speak to encouraging well planned development that integrates with existing built form. 2.4.1 speaks to the need to routing future principal streets around existing neighbourhoods, instead of through them.

The proposed re-designation and rezoning will allow for improved integration with existing development by permitting flexibility and site-specific controls through the development agreement. This will allow landscaping and buffering requirements designed specifically for this situation that are not enabled in the land use bylaw. These could include fencing requirements, lighting, and other specific ideas that are identified by the public during the required public consultation. The proposed development also creates principle access on a new street (Street D), with the secondary access on Charlton Ave itself to access a small area consisting of 9 lots that could be subdivided to provide up to 18 units. Parkmoor Ave will be extended to provide a secondary access but it is anticipated that Street D will provide the main access to the development.

The proposed development is a natural infill site, surrounded by lands that are slated for similar development forms, that supports the adjacent growth centre and makes use of existing water and sewer capacity. There is not any additional financial burden on HRM and thus meets the requirement of Policy 10.2 of the Halifax Plan

The MSSPS in policy 1.5.1 enables Residential Development Districts so that "residential development areas planned and developed as a whole or in phases under a unified site design, providing a mixture of residential uses and related recreational, commercial and open space uses, with an emphasis on a mix of dwelling unit types."

Policy 1.51 requires that a new zone, called Residential Development District be established to enable the comprehensively planned development area. The Parkmoor Ridge development area will require this rezoning.

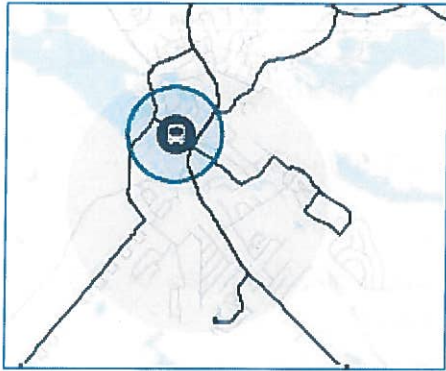
Schedule 1 establishes specific policy guidance for development agreements within the Residential Development Districts zone. The Plan does not provide specific criteria for the re-designation to RDD, but the policies for the RDD zone provide guidance regarding the future development and if the Parkmoor Ridge development can comply with these policies.

	RDD Policy Guidance	Proposed Development
Permitted uses	Residential Uses, community facilities Institutional uses Neighbourhood Commercial Uses Commercial Convenience Centre	<ul style="list-style-type: none"> Residential uses include (singles, semis and town houses) Parks Passive Open Space total number of units: 270
Gross Density	22 persons per gross acres. More may be considered	19.4 people per acre
Maximum area covered for apartment uses	15%	0
Transition between new residential development abutting existing –	Protect character and scale of these areas through open space, landscaping and traditions of differing building forms and densities.	<ul style="list-style-type: none"> Townhouse development will not abut existing R-1 development Two entrances to development. One on Parkmoor and a new Street D, which is anticipated to provide the main point of entry to the development. Site specific landscaping and buffering may be included in the DA. RDD zone is located nearby the proposed development area, thereby creating consistency with the general urban form of the area.
useable, landscaped open space	At least 5%	Development meets this requirement
Proximity to lakes or waterbodies	No residential building within 50 feet and no commercial within 100 feet	20 metre buffer from watercourses
Community facilities or institutional use proximity to watercourse	Special requirements within 100 feet	No community facility or institutional use proposed.

Landscape plan	Require a landscape plan	Landscape plan will be submitted as part of the development agreement.
Access	Access to arterial or collector streets should be such that additional traffic along local streets in residential neighbourhoods adjacent to the development is minimized	Herring Cove Road is an arterial road. A new street will be created to absorb most of the access to the site. Parkmoor Ave. will be extended to provide a secondary access.
Common parking areas	Where common parking areas are provided, they should be so aligned as to restrict through traffic	No common parking will be required
Minimum size for a DA within this area	3 acres	27 hectares (66 acres) – Total developable area is 19.9 hectares.
Adequacy of municipal infrastructure	Within the ability of HRM to provide services	Existing services are adequate.

4 Other policies and Plans

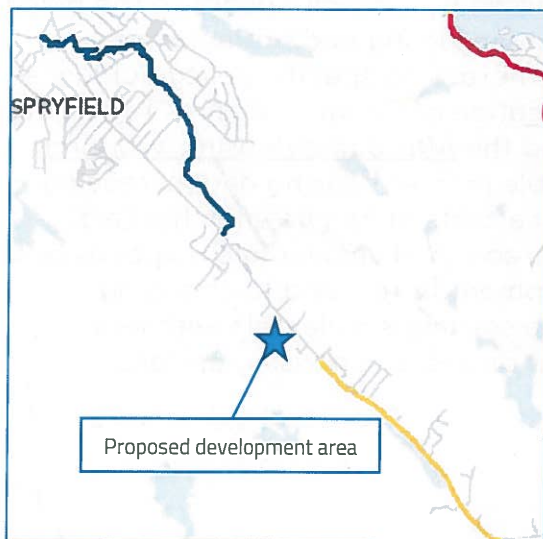
The Integrated Mobility Plan (IMP) provides guidance when considering the re-designation and zoning request for Parkmoor Ridge. The intention, in part, of the IMP is to coordinate HRM decision making to encourage complete communities, move people, and manage congestion. Of relevance for this proposal is the IMP stated direction to improve transit and mobility by focusing development around strategic corridors and areas that facilitate walking and biking.



The IMP (see reference 1) identifies Spryfield as a potential transit-oriented community. However, the boundaries of each of the identified community are not defined yet. The Parkmoor Ridge development is in proximity or perhaps, upon further study by HRM, within the potential transit-oriented community. The area near proposed development currently receives a high level of bus services and is located within 800 metres of the MacIntosh Trail entrance.

Reference 1 - Excerpt from Figure 10 IMP

Figure 16 of the IMP shows existing bike infrastructure in the area of the proposed development. Of note, Spryfield is designated as a priority location for the installation of a multiuse pathway by 2020.



- Multi-use Pathway
- Protected Bikeway
- Painted Bicycle Lanes
- Paved Shoulder
- Signed Bicycle Routes
- Roads

Reference 2 - Portion of Figure 16 of the IMP

The property is served by regular and frequent bus service (Routes 9A and B). Although sidewalks are not along Herring Cove Road, there are trails and bike lanes close by. The area is served by several schools that are within biking distance

(William King Elementary, Herring Cove Junior High, and J.L. Ilsley). There are numerous community and recreational facilities located nearby, many within easy biking distance and bus distance. These include:(examples of distances from Parkmoor Ave. are provided for reference)

- A swimming beach at Long Pond (5-minute bike or 20-minute walk)
- Roaches Pond Ballfield Park
- Roaches Pond Park (14-minute walk, 4-minute bike)
- Spryfield Lions Club Arena (12-minute bike, 39-minute walk, 5-minute drive)
- Captain Will Spry Centre(15-minute bike, 16-minute bus)
- Elizabeth Sutherland School Park

The proposed development clearly supports many of the policies of the IMP by providing additional density to areas where transit and active transportation corridors either exist or are planned. The proximity of Parkmoor Ridge to existing retail and commercial along Herring Cove Road will only encourage more retail and commercial development that supports a complete streets approach.

The Housing Affordability Workplan, recently passed by Council, speaks to the many initiatives that are to occur to support housing affordability and promote the provision of adequate housing for all. Although there is no specific policy guidance from this document, it does provide a clear indication of Council's desires regarding housing. I would point to both the Workplan and the Affordable Housing Working Group – Strategic Plan which speaks to affordable market housing and increasing flexibility to allow for "soft" approaches to reduce costs of homeownership (e.g. secondary suites, laneway development). The creation of smaller lots responds both to affordability issues and the desire for development to respond to changing demographic needs (older populations often are seeking smaller lots with less maintenance, for example) by providing greater diversity in housing options.

5 Summary

The proposal to re-designate and rezone the subject property and to enter into a DA to permit a comprehensively planned low and medium residential development is supported by many of HRM's policies and plans.

- The proposal is context sensitive – There is a large RDD area to the east. The proposed housing mix is mainly low density, with limited townhouse development and mirrors the housing typology nearby. By permitting the development by a development agreement, site specific regulations may be established that responds to any community issues that may arise through the consultation process.



- The development is located near or potentially within a future Transit Oriented Community. There are many amenities and community resources within walking, biking or transit distance. The development is located to support the IMP's vision of reducing car dependence. The development is within the Urban Transit Boundary.
- The proposed development is able to meet the policy requirements for a development agreement within an RDD zone and will provide lower cost market-based housing near peninsular Halifax.

If you have any questions, please contact me at chrystal@brighterplanning.ca or by phone at 902-790-0664.

Sincerely,

Chrystal Fuller, LPP, MCIP
Brighter Community Planning and Consulting

