



**AFFORDABLE HOUSING**

ASSOCIATION OF NOVA SCOTIA

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Halifax, NS

B3L 4H7

Matt Conlin

Planner III | Urban Enabled Planning Applications

Halifax Regional Municipality

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Re: Development Agreement Application for Proposed Multiple-Unit Mixed-Use Development at Parcel W Sackville Drive, Halifax, NS (PID: 40423899)

Dear Matt,

The Affordable Housing Association of Nova Scotia (AHANS) is pleased to submit this Development Agreement (DA) application for a proposed multi-unit residential development with a small commercial space on Sackville Drive (PID: 40423899). Our application includes the following supporting documents:

- Application Letter & Policy Rationale
- Site Plan
- Architectural Renderings
- Floor Plans & Elevations
- Landscape Plan
- Site Servicing Plan
- Stormwater Management Plan
- Traffic Impact Statement
- Shadow Study

## 1 | Proposed Development Summary

AHANS is seeking a DA to permit a 6-storey residential building with 81 units and a small ground floor commercial space. Table 1 includes details of the proposed development.

Table 1

Site Size	11.3 acres
Proposed GFA	94,126 sf.
Number of Storeys	6
Number of Residential Units	81
Amenity Space	11,097 sf.
Vehicle Parking	96
Bicycle Parking (sheltered)	33
Bicycle Parking (unsheltered)	8

AHANS received the property from the Department of Growth and Development to develop a medium density mixed-income development that incorporates sustainable levels of affordable housing for Halifax Regional Municipality (HRM). Key deliverables in our provincial application include:

- **Affordability:** Sustainable mixed-income development with up to 40% of units available at below market rates per both provincial and federal definitions. The asset will remain in the hands of a non-profit housing provider ensuring affordability for residents in perpetuity.
- **Energy:** Designed to target Net Zero Energy Ready energy efficiency.
- **Accessibility:** Incorporates universal design principles while also achieving provincial accessibility requirements.

## 2 | Zoning Context

The property is designated Urban Residential in the Sackville Plan Area. It is AHANS' understanding that the property is currently under the provisions of the Millwood Planned Unit Development (PUD) agreement (circa 1980s). HRM Planning staff have clarified PUD agreements can no longer be utilized in the current policy context. To pursue development through today's municipal framework, the agreement must be discharged and a current zone from the Sackville Land Use Bylaw applied. There is the potential to pursue approval for a

multi-unit dwelling development with a small commercial use through enabling policy UR-8 and UR-20 of the *Sackville Municipal Planning Strategy* (MPS).

### 3 | Enabling Policy Rationale

Tables 2 through 4 summarize what we believe to be appropriate rationale for the proposed development under enabling policy in the *Sackville MPS*.

Table 2: UR-8

*UR-8 Notwithstanding Policies UR-2 and UR-7, within the Urban Residential Designation, it shall be the intention of Council to consider multiple unit dwellings over six (6) dwelling units, according to the development agreement provisions of the Planning Act. In considering such an agreement, Council shall have regard to the following:*

<i>the adequacy of separation distances from low density residential developments;</i>	The proposed site contains several constraints which reduces developable land. Constraints are illustrated in the site plan included in this application. To respect forthcoming setbacks from watercourses in the Regional Plan and the impact on the natural features of the site, the proposed project focuses development on the top North-West corner of the site. The location provides a 23-meter separation from the closest low density residential development, and there is a 16.4-meter setback from the property line at the rear of the building abutting single family residences.
<i>that the height, bulk, lot coverage and appearance of any building is compatible with adjacent land uses;</i>	The site is surrounded by a variety of zones. Abutting the site are zones R-6, R-2, R-1 and C-2 zones. The proposed building location is closest to the R-6 zone which permits a multi-unit dwelling up to 4 units, shared housing up to 10 bedrooms, and select commercial uses. A Comprehensive Development District (CDD) is directly across Sackville Drive, which includes townhouse style units and a 4-storey multi-unit building. The grade of the site also creates a natural illusion of a smaller, shorter proposed building from street view. From Sackville Drive the building height is comparable to that of the 4-storey building at 15 Melham Drive (image of vantage point included in building renderings). The proposed building covers 3.53% of the

	site (complete coverage, including entry roofs & balconies).
<i>that site design features, including landscaping, amenity areas, parking areas and driveways, are of an adequate size and design to address potential impacts on adjacent development and to provide for the needs of residential of the development;</i>	<p>The proposed site plan contains a total of 96 parking stalls (68 indoor; 28 outdoor) for a parking to unit ratio of 1:1.2. There is 11,097 sf of amenity space on-site (5,823 sf. indoors; 5,274 sf. outdoors), which exceeds the amenity space requirements in the R-4 zone of the <i>Sackville MPS</i>. The site includes 41 bicycle spaces, 33 in a secure storage area, and 8 outdoors, consistent with requirements in the <i>Sackville MPS</i>.</p> <p>The landscape plan includes softscape design features around the building to provide privacy from neighbouring properties while complimenting the naturally occurring features of the site to the East. The site plan includes a barrier free walking path around the property that would act as an extension to the sidewalk on the western side of Sackville Drive. The project proposes to enhance pedestrian connectivity by formalizing an informal pedestrian path through the site for the wider community with adjoining paths from the building. The formalization of this path is contingent on a maintenance partnership with HRM Park &amp; Recreation.</p>
<i>preference for a site in close proximity to community facilities such as schools, recreation areas and transit routes;</i>	<p>The site is in close proximity to community services including:</p> <ul style="list-style-type: none"> <li>• Bus stop (serviced by route 83 &amp; express route 183): 1-minute drive/ 5-minute walk</li> <li>• Sackville Heights Elementary: 2-minute drive/ 10-minute walk</li> <li>• Sackville Heights Junior High: 4-minute drive/26-minute walk</li> <li>• Millwood Highschool: 3-minute drive/ 11-minute walk</li> </ul> <p>In addition to the nearby bus stops (service running every 30-minutes), the site is a 6-minute drive or 15-minute bike ride to the Sackville Transit Terminal.</p>
<i>that municipal central services are available and capable of supporting the development;</i>	The site is within the Urban Service Boundary and serviced by municipal water and wastewater. Please refer to the Site Servicing Plan enclosed in our application.
<i>that appropriate controls are established to address</i>	Please refer to the Site Servicing Plan enclosed in our application.

<i>environmental concerns, including stormwater controls, based on a report from the appropriate Municipal, Provincial, and/or Federal Government authority;</i>	
<i>that the proposed development has direct access to a local street, minor collector or major collector as defined in Map 3 - Transportation;</i>	The site fronts onto Sackville Drive/ Evangeline Trail (Route 1). Sackville Drive is classified as a Major Collector Road in Map 3 (Sackville Transportation Map).
<i>that it is not being considered on lands which are presently zoned and developed for either single or two unit dwelling purposes nor where it is intended to replace a single or two unit dwelling which has been demolished, removed or destroyed by fire;</i>	The property is zoned Millwood Planned Unit Development (PUD) agreement which cannot be applied in the current planning context. There are not currently, nor have there ever been, any single- or two-unit dwellings on-site.
<i>the impact on traffic circulation and, in particular, sighting distances and entrances and exits to the site;</i>	Please refer to the Traffic Impact Statement enclosed in our application.
<i>general maintenance of the development; and</i>	Any specific general maintenance of the development can be assigned through the DA process.
<i>the provisions of Policy IM-13.</i>	See IM-13 policy analysis below.

Table 3: UR-20

*UR-20: Notwithstanding Policies Ur-2 and RR-2, council may consider permitting commercial service uses on properties west of Millwood Drive, within the Urban and Rural Residential Designations, according to the development agreement provisions of the Planning Act. In considering such an agreement, Council shall have regard to the following:*



<i>(a) that the site has frontage on and direct access to Highway No. 1;</i>	The site has direct frontage on to Highway No. 1.
<i>(b) that the height, bulk, lot coverage and appearance building is compatible with adjacent land uses;</i>	Please see response in Table 2 UR-8 policy analysis.
<i>(c) that adequate provision is made for buffering and screening from adjacent residential properties and travelling public;</i>	The landscape plan includes trees along the North-West end of the property to screen adjacent residential properties from the building. The grading of the site also acts as a natural barrier between proposed commercial space and residential properties. The building location provides an adequate buffer between commercial space and travelling public.
<i>(d) that site design features, including landscaping, signage, parking areas and driveways are of an adequate size and design to address potential impacts on adjacent development, and to provide for the needs of users of the development;</i>	Please see response in Table 2 UR-8 policy analysis for the proposed building. The proposed commercial space is a small convenient store for residents and the surrounding community to purchase day-to-day needs and is 864 sf. This represents 0.92% of the total building GFA. While the design features described in the analysis of policy UR-8 are relevant to the proposed commercial space, additional considerations include 5 dedicated outdoor parking spaces, a dedicated entrance separate from the main building (and no direct access to the residential space), and additional landscaping to screen commercial space from adjacent residential properties.
<i>(e) that appropriate controls are established, as authorized by the Planning Act, to address environmental concerns, including stormwater controls, based on a report from the appropriate municipal, provincial and/or federal government authority; and</i>	Please refer to the Site Servicing Plan enclosed in our application.
<i>(f) the provisions of Policy IM-13</i>	See IM-13 policy analysis below.

Table 4: IM-13

*IM-13: In considering amendments to the land use by-law or development agreements, in addition to all other criteria as set out in various policies of this planning strategy, the Sackville Community Council shall have appropriate regard to the following matters:*

<i>(a) That the proposal is in conformity with the intent of this planning strategy with the requirements of all other municipal by-laws and regulations</i>	We believe the above analysis of policies UR-8 & -20 in tables 2 and 3 illustrate that the proposed development conforms with the intent of the <i>Sackville MPS</i> . The policy discussion in section 4, considers additional benefits we believe are consistent with the intent of the <i>Sackville MPS</i> .
<i>(b) That the proposal is not premature or inappropriate by reason of:</i>	
<i>(i) the financial capability of the Municipality to absorb any costs relating to the development;</i>	We are unaware of any costs related to the development that the Municipality would have to absorb.
<i>(ii) the adequacy of sewer and water services;</i>	Please refer to the Servicing Schematic enclosed in our application.
<i>(iii) the adequacy or proximity of school, recreation and other community facilities;</i>	The UR-8 policy review in Table 2 lists the proximity of the proposed project to surrounding schools and public transportation stops. AHANS plans to engage with the Halifax Regional Centre for Education throughout this process to better understand school capacity. We believe the proposed unit mix will put only a modest additional pressure on community schools.
<i>(iv) the adequacy of road networks leading or adjacent to, or within the development; and</i>	The proposed project has direct access to Highway 1.
<i>(v) the potential for damage to or for destruction of designated historic buildings and sites.</i>	There are no historic buildings on site eliminating the potential for damage or destruction.

<i>(c) that controls are placed on the proposed development so as to reduced conflict with any adjacent or nearby land uses by reason of:</i>	
<i>(i) type of use;</i>	See policy analysis of UR-8 & -20 in tables 2 & 3.
<i>(ii) height, bulk and lot coverage of any proposed building;</i>	See policy analysis of UR-8 & -20 in tables 2 & 3.
<i>(iii) traffic generation, access to and egress from the site, and parking;</i>	Please refer to Traffic Impact Statement enclosed in our application.
<i>(iv) open storage;</i>	All storage will be contained within the building.
<i>(v) signs; and</i>	Any specific sign limitations for the development can be assigned through the DA process.
<i>(vi) any other relevant matter of planning concern.</i>	See policy analysis of UR-8 & -20 in tables 2 & 3.
<i>(d) that the proposed site is suitable in terms of steepness of grades, soil and geological conditions, locations of watercourses, potable water supplies, marshes or bogs and susceptibility to flooding;</i>	Please refer to the Grading Plan enclosed in our application.
<i>(e) any other relevant matter of planning concern; and</i>	AHANS is prepared to work with Planning and Development staff regarding any planning concerns raised about the proposed development that were not addressed in our application.
<i>(f) within any designation, where a holding zone has been established pursuant to AInfrastructure Charges – Policy IC-6”, Subdivision Approval shall be subject to the provisions of the Subdivision By-law respecting the maximum number of lots created per year, except in accordance with the development agreement</i>	N/A — it is our understanding that policy IC-6 does not apply to this site.



## 4 | Policy Discussion

In addition to the analysis of enabling policy in Tables 2 through 4, we believe the proposed project has additional benefits that align with the overall intention of the *Sackville MPS*.

The *Sackville MPS* explains that the Nova Scotia Department of Housing began land banking property in 1967 after Sackville was identified as a suitable site for urban residential development. Much of this land was developed, however some parcels were left vacant. AHANS received this parcel of land from the Department of Growth and Development for the explicit purpose of developing a multi-unit building that incorporates affordable housing. We believe the proposed project is consistent with the original purpose of this property while aligning with the intent of the Urban Residential Designation. The proposed development not only incorporates a variety of housing sizes for residents, but it also includes mixed-rent levels housing that are attainable for different socio-economic households.

Although AHANS is a non-profit, not a cooperative, the Social Housing section of the *MPS* speaks to the need for affordable housing and the municipalities intention to support CMHC housing programs. The proposed project is supported by the provincial Department of Growth and Development, as the land was accessed through the Land for Housing Program and will seek financing through CMHC's Affordable Housing Fund — a program dedicated to creating affordable housing.

Policy REC-1 of the *MPS* outlines Council's intention to increase land for public purposes. Part of the proposed development includes the formalization of an informal pedestrian path through the site (illustrated on the site and landscape plan) for residents and the community. AHANS hopes to partner with HRM to formalize this path as a functional recreational space and support AHANS with maintenance year-round.

AHANS understands the vital role wetlands, marshes, and watercourses play for the environment and communities related to stormwater management and ecosystem preservation. Specifically, the *MPS* speaks to the importance of the Little Sackville River System and the impact development has had. Part of the Little Sackville River feeds into the site; rather than alter or impact this area, AHANS is seeking alternatives to conserve the

natural feature. We intend to explore partnering with a local conservation non-profit organization to act as a steward of the area as illustrated on the Site and Landscape Plan. Throughout the DA process, AHANS hopes to work with municipal staff to identify the most efficient way to approach the conservation of this area of the site. This initiative is directly aligned with policy REC-8 which aims to encourage local groups and initiatives to enhance conservation efforts of areas along the Little Sackville Rivers.

Finally, the proposed project is aligned with HRM's HalifACT Plan to achieve net-zero by 2050. AHANS is committed to targeting a net zero design reducing effective Green House Gas emissions produced on site to zero. Targeting net-zero is not only critical in the fight against climate change, it also plays a crucial role in maintaining affordability for residents.

## 5 | Closing

The vacancy rate in Halifax Regional Municipality (HRM) is 2.1% and remains tight for low-income households. According to CMHC's Rental Market Fall Report (2024) the vacancy rate for units priced below \$1,300 is under 1% and the turnover rate for affordable rental apartments remains at a 7-year low. The rental market is easing; however, it remains difficult for households in need of affordable housing. Purpose built mixed-rental housing, such as the proposed project, is critical to create housing that is attainable for low to moderate income households that will remain affordable in perpetuity.

We hope the information included in this application highlights the thoughtfulness of this project and the effort by our team to respect policy in the *Sackville MPS*. AHANS appreciates the opportunity to submit the enclosed planning application, and we look forward to continuing to work with HRM staff.

Sincerely,

Michael Kabalen  
Executive Director, AHANS