

Minimum planning changes in Halifax

What We Heard Report

June 2025

HALIFAX



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BACKGROUND

This What We Heard Report describes the public engagement process for the changes to plans and by-laws the municipality proposed to comply with the Minimum Planning Requirements legislation.

The [*Halifax Charter*](#) (“*the Charter*”) is provincial legislation that controls how the Municipality operates. The Minimum Planning Requirements are regulations that form part of the Charter. The municipality’s land use plans and strategies must meet these minimum requirements.

In [August 2024](#), the [province of Nova Scotia announced](#) 12 new minimum planning requirements regulations. These requirements are intended to make sure that the municipality’s planning framework, including policies, by-laws, regulations, decisions and development approvals, recognize the current housing crisis in the Halifax region and works to support the increase in housing supply. The legislation is provided for reference in Appendix D.

This Report summarizes feedback received from the public about the Minimum Planning Requirements. The Report is accompanied by a series of appendices for reference:

Appendix A – Correspondence Log

Appendix B – Correspondence Attachments

Appendix C – Informational Factsheets

Appendix D – Copy of Minimum Planning Requirements Legislation



WHAT WE DID

Municipal planning staff completed a technical review of the Minimum Planning Requirements alongside the existing planning framework to determine how to best address the changes required and met with provincial staff to confirm the approach.

It was determined that to comply with the new regulations, the municipality had to make changes to the Regional Municipal Planning Strategy (the Regional Plan), secondary municipal planning strategies (Community Plans), and land use by-laws.

On [October 1, 2024](#), [Regional Council](#) directed staff to incorporate amendments to meet the Minimum Planning Requirements (MPR) as part of the ongoing [Regional Plan Review](#) and approved a public participation program.

In accordance with the Planning and Development Public Engagement Guidebook, the public participation program followed an 'inform' approach. This approach focuses on providing residents with balanced and objective information to assist them in understanding the topic.



HOW WE GOT THE WORD OUT

Public engagement for the Minimum Planning Requirements changes followed the public participation program approved by Regional Council on October 1, 2024. Because the changes being made are mandatory and required by provincial legislation, the public engagement materials focused on information-sharing and making the public aware of the changes.

The public was invited to share comments and questions with staff over the course of the 30-day engagement period from January 24 to February 24, 2025.

The information campaign included several digital and physical methods of communication.

Website

The [Shape Your City Webpage](#) for the Minimum Planning Requirements was launched on January 24, 2025. The webpage was a central hub for the engagement as digital and print advertisements directed the public to visit the webpage to learn more. The Shape Your City Halifax homepage included a link to the Minimum Planning Requirements project webpage.

Elements of the Minimum Planning Requirements webpage included:

- Key background details explaining the Minimum Planning Requirements legislation and how this legislation relates to the Halifax Charter;
- A timeline of key dates, including the announcement of the Requirements, relevant Council meetings, and the start and close of the public engagement period;
- Details about the purpose of the public engagement period and contact information to connect with staff;
- An explanation of what next steps can be expected after the close of the 30-day engagement period;
- A table that summarized each of the 12 Minimum Planning Requirements and the municipality's proposed approach to comply with each requirement;
- 12 informational factsheets that provide greater detail on the proposed approach for each Requirement, what plan areas are affected, and what changes residents can expect to see. The factsheets are included in **Appendix C**.



Image 1: Still from engagement video

Meetings

Staff were available to meet with residents, community, and development industry groups during the engagement period and the following weeks.

Email and Phone Correspondence

The email (regionalplan@halifax.ca) and phone number (902-943-5139) were the primary methods of communication between staff and the public. Staff returned phone calls, logged correspondence, and answered questions.

Approximately 130 pieces of correspondence, comprising emails and phone calls, were received during the engagement period. A full compilation of the correspondence is found in **Appendix A** with associated attachments included in **Appendix B**. Any formal correspondence received outside of the engagement period was forwarded to the Clerk's office for distribution to Regional Council.

Digital Screens and Posters

A short video explaining the Minimum Planning Requirement changes and how to learn more was displayed on digital screens in libraries, transit terminals, and recreational centres across the municipality during the engagement period (see Image 1 on Page 5).

Posters were distributed to all library branches and included a brief explanation of the changes and where to learn more, including a QR-code linking to the webpage. Staff contact information was included in the video and on the posters (see Image 2 below).

Digital Ad Campaign

The informational nature and condensed time period for the public engagement meant that information about the municipality's approach to the Minimum Planning Requirements and how to learn more were primarily advertised digitally.

The information campaign included:

- Paid social media campaign: Ads were shown to Meta users on Facebook and Instagram across the municipality inviting residents to learn more about the Minimum Planning Requirements by visiting the project webpage.
- 'Organic' non-paid social media posts: These were posts from the municipality's Instagram, Facebook, and X accounts, and included a notification to the Regional Plan email list. The posts introduced the Minimum Planning Requirements and invited residents to learn more about the proposed changes by visiting the project webpage.

Table 1 summarizes the reach of the information campaign across all digital platforms.



Image 2: Print Poster

Table 1: Digital Informational Campaign

Type of Content	Platforms	Impact
Paid Social Media Campaign	Meta Ads (Facebook, Instagram)	<p>Clicks: 3,948</p> <p><i>Clicks are when someone clicks on the ad</i></p> <p>Impressions: 530,532</p> <p><i>Impressions are the total number of times the ad is shown, regardless of whether anyone clicks it</i></p> <p>Reach: 181,153</p> <p><i>Reach is how many unique people saw the ad. If someone sees the ad multiple times, they are counted only once in the reach</i></p>
Organic 'Unpaid' Social Media Posts	Facebook Instagram X (Twitter)	<p>Total Engagements: 474</p> <p><i>Engagements are the number of reactions, comments, shares, and clicks on a post</i></p> <p>Reach: 69,636</p> <p><i>Reach is the number of users who saw the post</i></p>
Mailing List	Shape Your City and Regional Planning email lists	222 emails sent
Regional Plan Website	www.halifax.ca	Page views: 813
Shape Your City Project Webpage	Shape Your City	<p>Page Views: 7,800</p> <p>Document Downloads: 1,960</p>

WHAT WE HEARD

General Feedback

All emails and phone calls were recorded and analyzed by staff. In general, feedback received on the Minimum Planning Requirements (MPR) was mixed. Residents often noted support for a few of the changes and concern about others in the same correspondence. Some residents thought that the MPR were being implemented too slowly, and others found that the changes were occurring too quickly without time to fully understand the impacts. Frustration was expressed about the provincial role in requiring the changes, and the length of the public engagement period.

The main theme that emerged from feedback is that residents may be confused about the nature and scope of the Minimum Planning Requirement changes. Of the 130 pieces of total correspondence, approximately half were largely unrelated to the proposed changes.

Some community groups and residents used the opportunity presented by the MPR engagement to share thoughts on more general Regional Planning issues, such as advocating for transit service to their community. Many residents did not understand the scope of the MPR changes, or thought they were the *Housing Accelerator Fund Urgent Changes to Planning Documents for Housing* amendments from Spring 2024.

An online petition that received hundreds of signatures (*see correspondence MPR107 in Appendix A*) misunderstood the MPR and prompted correspondence that was not closely related to the scope of the proposed changes.

Confusion about the Minimum Planning Requirements is not unexpected. Residents are



unaccustomed to technical planning changes originating from provincial legislation and expect more ability to substantially alter a proposed approach with their feedback. The rapid pace of change in the municipality may also be challenging for residents to follow and provide feedback on, leading to uncertainty around who is responsible for introducing various planning changes, whether new regulations are in effect, and who to contact with questions.

Acknowledging these challenges, staff responded to all correspondence directly, clarified the scope of the MPR changes where necessary, and referred residents to colleagues working on relevant projects for follow-up as needed.

Comments received during the public engagement period for the Minimum Planning Requirements are summarized below. Refer to **Appendix A** for a complete list of correspondence.

Requirement-Specific Feedback

Staff analyzed feedback and have provided summaries of what we heard from residents for each of the Minimum Planning Requirement regulations. There are 12 requirements.



Requirement A

Regulation Text

(a) include a statement of policy that expressly recognizes that the Province and, in particular, the Municipality are experiencing a housing shortage crisis and specifies that the most urgent priority in municipal land-use planning, regulation and development approval is to rapidly increase the supply of housing in the Municipality;

Proposed Approach

The Regional Municipal Planning Strategy (also called the 'Regional Plan') will include new policy that recognizes the housing shortage crisis and establishes a goal of increasing the housing supply. The Regional Plan sets out a common vision and long-range, region-wide planning policies that outline where, when, and how growth and development should take place.

What We Heard

A small amount of correspondence was received for this Requirement. Feedback that supported requirement A called it a 'common sense' change and agreed that the municipality's proposed approach sufficiently meets the intent. However, comments also expressed concerns about balancing housing need with community engagement, complete communities, and protected natural areas. There are concerns that Requirement A promotes increasing housing without any support for infrastructure and services, and that the need for affordable housing is overlooked. Residents expressed skepticism that the proposed amendments will make a real difference in the housing crisis and address the need for affordable housing.

"The crisis of housing in HRM at present is 'affordable' housing, which I do not see as being directly addressed by the Planning changes. Where is the requirement for developments to include some portion of 'affordable' units?"

- Comment from Resident, MPR97

Requirement B

Regulation Text

(b) require that priority be given to increasing the supply of safe, sustainable and affordable housing in the Municipality over other interests identified in the municipal planning strategy for the purposes of all processes, approvals and decisions made under the municipal planning strategy;

Proposed Approach

New language in the Regional Plan will emphasize the importance of increasing the supply of safe, sustainable, and affordable housing. The Regional Plan uses the lens of safety, sustainability, and affordability to create a framework for housing and growth that considers public health, use of existing infrastructure (e.g. water/sewer, roads, transit services, etc.) and complete communities where people can live, work, and play.

What We Heard

Some general support was received for Requirement B, but feedback was predominantly critical of the language of the requirement and the proposed changes. There are concerns about what prioritizing housing above all else will mean for the environment, infrastructure, principles of good planning, public transportation, traffic and road safety, and other services like policing.

Residents expressed that housing should not take priority over these other considerations, and would like to see 'safe, sustainable, and affordable housing' include more of a focus on creating vibrant, healthy, and empowered communities that include considerations such as accessibility.

"Housing is an urgent need and responsibility borne by municipal and provincial coffers. However, it is imperative that we do not prioritize housing over prudent decision-making that encompasses a comprehensive perspective on the quality of life.

These proposed amendments are intended to expedite residential development. Nevertheless, it is crucial that we ensure that they do not compromise responsible community-driven planning."

- Comment from resident, MPR108

There are also questions about what impacts these changes could have on communities with unique cultural and historical significance, such as African Nova Scotian communities.

Concerns were expressed that the urgency to build housing quickly could result in developments that do not align with good planning principles.



Requirement C

Regulation Text

(c) permit residential uses in all zones, except for all of the following:

(i) areas zoned for industrial, military, park, transportation reserve, and utility uses,

(ii) zones intended to protect the environment, water supply, floodplains or another similar interest;

The remaining 0.2% of the residential properties are large-scale sites (such as Shopping Malls/Plazas) that may be appropriate for new housing through current or future development projects, pending future technical review and community engagement. Regional Plan policy will direct this work through the Suburban Plan process.

Proposed Approach

The Regional Plan will include policy intent to enable residential in all zones except for those identified in the regulations. To determine if changes are needed to meet the requirements, staff reviewed all zones within the municipality. After removing zones that are exempted within the regulation (see i and ii of the regulation above), results showed that 99.8% of remaining properties already allow for a form of residential use.

What We Heard

This Requirement does not involve many changes to existing policy and regulations and did not garner as much public interest, but feedback was generally supportive of the proposed approach.

The Requirement's exclusion of environmental zones was important to residents concerned about development encroaching into environmentally sensitive areas. The development community provided feedback and requested that the scope of the proposed approach be expanded to allow more as-of-right development and to create new pathways for development in advance of the Suburban Plan.

The Lucasville Vision Committee requested that this Requirement not apply to African Nova Scotian communities, and to allow the community to direct any future zoning changes through Community Action Planning (see correspondence MPR94 in Appendix A).



Requirement D

Regulation Text

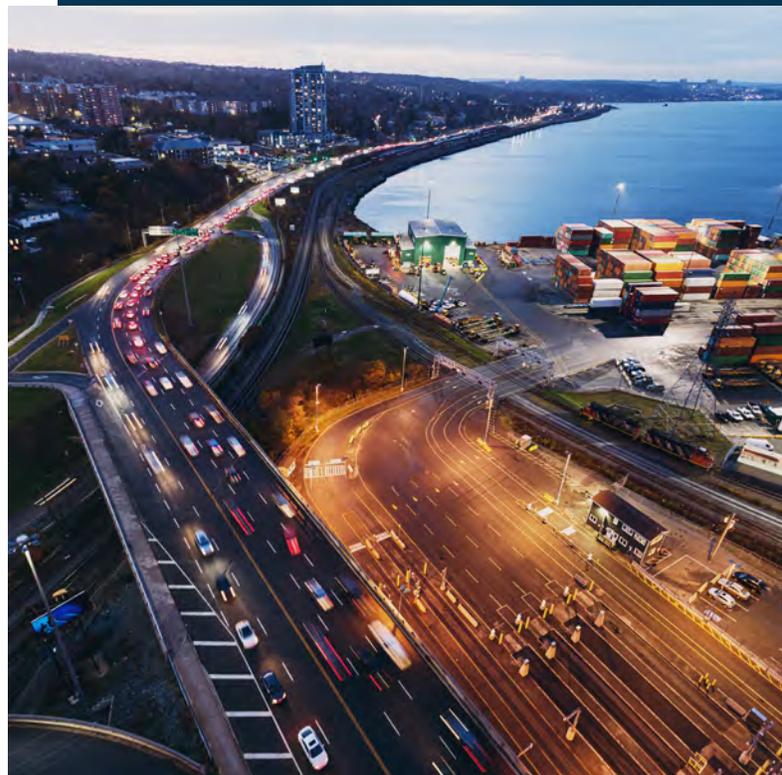
(d) require that the Municipality share with the Province the information used by the Municipality to identify, fund, schedule and deploy the infrastructure to develop an adequate supply of housing to support anticipated population growth;

Proposed Approach

The Regional Plan will clearly state the municipality's intent to share information about population, housing, employment conditions, and growth scenarios with the Province of Nova Scotia.

What We Heard

A small amount of feedback was received for this requirement, but comments from residents and the development community indicated general support. It was also suggested that stronger language should be used to require the sharing of information.



Requirement E

Regulation Text

(e) provide for the adoption of a secondary municipal planning strategy and the implementation of a land-use by-law for the area of the Municipality identified as the suburban area on the map attached as Appendix A, or a substantially similar area, no later than January 31, 2025;

Proposed Approach

The Regional Plan will include an overview of the Community Planning framework and establish intent to adopt a Suburban Plan. The development of the Plan requires comprehensive analysis, and community engagement. The Suburban Housing Accelerator Plan and Land Use By-law was adopted in 2024 and expanded in the Spring of 2025. The Municipality continues to coordinate with the Province and other stakeholders on the development of the Suburban Plan.

What We Heard

Feedback on this Requirement focused on the implementation of the Suburban Plan as part of addressing the housing crisis, and desire to see faster progress on the plan.

Residents expressed concerns that a work plan or timeline for implementation has not been released to date. Members of the development community requested that plan amendments be considered in the interim to help progress developments in advance of the plan's release.

Despite frustration with the timeline, several comments highlighted the importance of community engagement as part of developing the Suburban Plan.

Residents are interested in learning more about the Plan and future engagement opportunities. The need to consider community engagement and an accelerated timeline for Suburban Plan completion is a main theme that emerged from feedback.

"We are approaching the two year anniversary of the suburban plan's announcement and the public still has no clear idea of the work completed to date, the depth of changes anticipated, or any tentative release date for draft documents. The housing crisis is clearly an extraneous circumstance, necessitating an accelerated timeline for the suburban plan compared to other planning documents. It is not reassuring for the public to see only a work plan after nearly two years of assumed work."
- Comment from resident, MPR15



Requirement F

Regulation Text

(f) for developments enabled under the Municipality's Conservation Design Development policies in the Regional Municipal Planning Strategy that begin construction before April 1, 2027, determine the maximum density of a development based on a lot's gross area and not on its net area;

Proposed Approach

Conservation Design Developments (CDD) are a type of residential subdivision within the rural areas of HRM. CDDs are designed to conserve open space and protect environmental features and can allow for more density than what is typically permitted in unserved/rural communities. CDDs require development agreements to proceed, which must be reviewed and approved by Community Council.

Until April 1, 2027, a change in how density is calculated for these types of developments will be in place. There is potential for higher density to be allowed within a new CDD project. The requirements of CDDs will remain unchanged and public consultation and technical studies will still be required to ensure the environment and transportation systems are not negatively impacted.



What We Heard

The feedback to Requirement (F) was largely supportive, but the changes were critiqued as being too narrow in scope. A few residents supported the change in calculating density, while others expressed concerns that this change would increase urban sprawl by allowing more housing than previously envisioned in rural areas.

This Requirement was of most interest to the development community and those associated with the construction of Conservation Design Developments. While some members of the development community welcomed the change, it was requested that the scope of the proposed changes be expanded to remove density caps associated with different types of Conservation Design Developments. Feedback expressed that the density calculation change from Requirement (F) is not enough to increase housing, and a broader review of the Conservation Design policies is desired.

Requirement G

Regulation Text

(g) not impose maximum height restrictions in a manner that negatively affects the density of residential buildings using mass timber or any other construction method;

Proposed Approach

Apartment buildings will now have their maximum heights measured in total storeys instead of in feet or metres. This will allow for more flexibility in construction methods such as timber-framed buildings. The definition of height in the land use by-law will reflect the height conversion to storeys.

What We Heard

For residents who support the changes associated with this Requirement, the change to storeys for apartment buildings makes sense and is an opportunity to have apartment units with higher ceilings.

Members of the development community welcomed the conversion from metres/feet to storeys and noted that it will help address challenges with achieving comparable densities, particularly for mass timber buildings. There were requests from members of the development community to expand the scope of the amendments to facilitate taller mid-rise buildings, and to provide greater details on the proposed height conversions to help determine impacts on projects.

Feedback was also received from members of the public who are opposed to greater building heights for environmental and heritage reasons and would prefer height to be capped at low or mid rise building typologies. Like many of the Minimum Planning Requirement changes, there was also some concern and confusion expressed around the scope of the changes and whether the amendments are changing where tall buildings are currently permitted.



Requirement H

Regulation Text

(h) for residential buildings that begin construction before April 1, 2027, provide that no requirement related to unit mix applies;

Proposed Approach

Until April 1, 2027, the land use by-law regulations for apartments are being changed to remove all bedroom count requirements. Unit mix is the number of studio, 1-bedroom, 2-bedroom units, etc. required per apartment building.

What We Heard

Feedback from residents and organizations regarding this requirement was strongly opposed to removing unit mix requirements, with many comments focusing on housing availability and affordability.

One-bedroom apartments are seen as unsuitable for many family structures and lifestyles, including young people, students, people who cannot live alone for accessibility reasons, and families with children. There are concerns that the change will worsen the housing crisis by resulting in developer preference for small studio and one-bedroom units with higher profit margins. A loss of affordable housing was highlighted as an issue, as one-bedroom apartments are typically rented at higher cost and cannot be shared with roommates to reduce costs.

Comments noted that fewer multi-bedroom units may impact residents' ability to be matched with social and affordable housing due to National Occupancy Standards maximums for bedroom occupancy, and new buildings without unit mix may prevent families from being able to live there.

Comments from Public Health – Central Zone (see correspondence MPR72 in Appendix A) noted that larger multi-bedroom units allow families to raise children in compact walkable communities, promoting healthier lifestyles and preserving ecosystem health by minimizing the need for greenfield development.



“One-bedroom units tend to cost more in rent per person compared to larger units that can be split between multiple roommates. Additionally, one-bedroom units don’t accommodate families, and fewer multi-bedroom units make the few multi-unit bedrooms much more challenging and expensive to find [...] One-bedroom units are a way for developers to increase unit counts and development feasibility, which helps increase the number of units built. But if we are focusing on people housed and not units built, then keeping unit mixes is essential”

- Comment from resident, MPR113

Requirement I

Regulation Text

(i) provide that no requirement for on-site parking applies to residential uses within the urban service area;

Proposed Approach

Land use by-law requirements will be changed so that residential buildings that are within the Urban Service Area are not required to provide a specific number of parking spots. The Urban Service Area is the part of the municipality serviced with municipal water and sewer.

Parking spot provision requirements for all other uses (e.g. commercial, retail, office, etc.) will remain unchanged. If developments include parking, requirements for parking lot design and landscaping, loading spaces, etc. will continue to apply.

“Eliminating the need for (...) parking and story height is ridiculous! Can you imagine the congestion of the streets where these new high-rises are being built coupled with the ability to construct without parking? Where will these vehicles go? Not everyone who lives in these buildings are cyclists.”

- Comment from resident, MPR63

What We Heard

There was relatively high interest about the changes associated with Requirement I, and feedback was mixed. Residents who welcomed the change noted that parking adds to building costs, takes longer to build, and can encourage car-centered street designs. There was interest expressed in the municipality adapting its approach and commitment to planning for complete communities, supporting more public transit, and ensuring accessible parking spots remain an option. Comments also discussed opportunities for environmentally friendly parking considerations such as electric charging spots and solar panels located over parking lots.

Several residents expressed concerns about reduced parking requirements and opposed the changes. The main theme of these concerns was that developers may not provide enough parking for residents, leading to issues with on-street parking including insufficient availability, increased traffic congestion, and impacts to snow clearing. While parking minimums for residential uses are already not required in the Regional Centre, there are concerns about how areas with higher levels of car dependency, such as suburban neighbourhoods, will fare without parking minimums.

Comments from members of the development community generally sought to ensure that the new parking requirements apply to their projects or to clarify whether their projects would be impacted.

Requirement J

Regulation Text

(j) for multi-unit residential buildings that begin construction before April 1, 2027, not require that the ground floor consist of more than 20% commercial space;

Proposed Approach

Until April 1, 2027, land use by-laws that currently require up to 100% of the ground floor of a building to be commercial uses will now only be required to provide 20% of the ground floor to be commercial.

These changes are being applied to Pedestrian Oriented Commercial Streets in the Regional Centre and the Pedestrian Retail zone in Sackville Drive. The alternative to providing commercial uses for buildings on these commercial streets is to provide residential units at the ground level.

What We Heard

While a few positive comments about Requirement (J) were received from residents, the majority of public feedback on this change was unsupportive. Comments from some members of the development community supported the change and the flexibility it provides and requested more flexibility in how the requirement is applied.

Public feedback expressing opposition to the Requirement notes that the buildings constructed will be part of the community for many years. Residents discussed the benefits of ground floor commercial spaces, including increasing commercial opportunities for local businesses, walkability, healthy communities, and community engagement in public spaces. Commercial ground floor spaces in new buildings were noted as

desirable for local residents (besides those living in the building) and a benefit to the community at large by creating space for public amenities and services including cafes, shops, fitness studios, and daycares.

A submission from the Business Improvement Districts (*see correspondence MPR47 in Appendix A*) requested that Requirement J be rescinded, citing their interest in ensuring walkable downtowns and main streets and avoiding negative impacts to residents, small businesses, and community organizations that rely on a mixed-use urban environment. Comments from residents also highlighted similar interest in maintaining walkable, mixed-use neighbourhoods and protecting the appeal of commercial streets.

“The buildings that will be constructed will be part of our communities for decades and generations. It is short sighted to remove requirements for commercial spaces in any large new builds. Promoting a mix of usable spaces on the ground level encourages walking, community engagement and lively commercial streets”

- *Comment from resident, MPR12*

Requirement K

Regulation Text

(k) permit temporary housing in non-permanent structures as a use in all zones where it can be safely established to allow employees to live on or near their worksite during a work assignment for a period of time that can be reasonably tied to the duration of the project and that is explicitly set out in the development permit;

Proposed Approach

There are existing regulations for temporary construction uses in all land use by-laws. Adjustments to the current language will ensure the intent of the Provincial Requirement is met across the entire municipality.

The Regional Centre, Suburban Housing Accelerator, and Downtown Halifax land use by-laws allow temporary housing uses on or near the work site, so no changes are needed in those areas.

What We Heard

This Requirement received a small number of comments and feedback was mixed. In general, feedback did not acknowledge that there are existing regulations in place that allow temporary housing. As such, while some residents saw this Requirement as a positive step and one that could help alleviate traffic congestion associated with construction crew vehicles commuting to work sites, there were concerns about overcrowding, poor living conditions, and worker exploitation.

A submission from the Lucasville Vision Committee (*see correspondence MPR94 in Appendix A*) expressed concerns that without clear guidelines and enforcement, these issues could be particularly impactful in historically



Black communities and not bring about long-term benefits for the community.

There were also concerns about the safety and services associated with temporary housing, including proximity to large machinery and blasting, how the sites will be serviced (water, waste, electricity, mail delivery, parking, etc.), and how the sites will be prevented from becoming established as permanent housing.

Requirement L

Regulation Text

(l) permit manufactured housing, including modified shipping containers converted into housing, in all residential zones.

Proposed Approach

Definitions and regulations in the land use by-laws are being adjusted to allow converted shipping containers as a residential use.

What We Heard

Some feedback supported this Requirement, with the condition that people convert shipping containers properly with permits to meet building code requirements.

However, most of the feedback received on Requirement (L) was unsupportive of the idea of allowing converted shipping containers to be used as housing. The main reasons given are concerns about neighbourhood aesthetic and character, shipping containers being unsightly and lowering property value, and whether the structures are safe for human habitation. There were suggestions to allow manufactured housing or shipping containers only as backyard suites or in a designed community of the same structures, instead of in existing neighbourhoods, and to have requirements for their aesthetic appearance.

There are also concerns that converted shipping container dwellings may disproportionately affect certain areas, particularly African Nova Scotian communities, as a rapid development solution that decreases housing standards and property values.

"It is my understanding that conventional shipping containers may be treated with chemicals that may pose a hazard to human and environmental health. I am also not convinced that a shipping container makes for a nice place to live and feel that this amounts to more of an architectural gimmick than a genuinely meaningful response to the housing crisis. I support modular and ready-to-move homes, but not shipping containers as housing."

- Comment from resident, MPR75



NEXT STEPS

Staff would like to thank everyone that participated in the public engagement. Amendments to advance the Minimum Planning Requirements will be brought forward for consideration by Regional Council in Spring 2025, as part of the Regional Plan Phase 4 amendment package.

While amendments associated with the Minimum Planning Requirements are addressing mandatory provincial legislation, the feedback from residents, community organizations, and the development community provided valuable insights into opinions and attitudes about a wide range of planning issues. We heard concerns around housing availability and affordability, infrastructure capacity, and access to amenities and services.

Staff will continue to engage with communities throughout the municipality as future planning work progresses on the Suburban Plan and Regional Plan Review Phase 5.



Appendix A – Correspondence Log

MPR1	<p>I just read that the Houston government wants more small apartments. This is nuts. To help with our housing shortages apartments need to have 2-3 bedrooms to allow for sharing.</p> <p>[name redacted] [redacted] Cedar St Halifax B3H 2J5</p> <hr/> <p>Hello</p> <p>Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be anonymized and used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.</p> <p>If you wish to submit additional comments or withdraw your submission, please let us know by Feb 24.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR2	<p>Hello,</p> <p>I very much disagree with the province on changes to the unit type requirement for new buildings. Requiring new buildings to include 2- and 3-bedroom units increases affordability and ensures that new housing builds meet the needs of the variety of lifestyles and family structures in Halifax. To prioritize one bedroom or bachelor apartments will decrease affordability and make it harder for families, couples, roommates, etc. to find housing that meets their needs. Families with kids typically do not want to live in a one bedroom apartment, neither do roommates, multigenerational families, etc. I would strongly encourage the provincial government to reconsider this change and return to the requirement for new buildings to include a variety of unit sizes and types.</p> <p>Sincerely, [name redacted]</p> <hr/> <p>Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be anonymized and used to inform a report to Regional Council this spring.</p>

There will be an additional opportunity for public comment at that time as part of the public hearing process.

If you wish to submit additional comments or withdraw your submission, please let us know by Feb 24.

All the best,

TELINA DEBLY | MCIP, LPP
 PLANNER II
 REGIONAL PLANNING | PLANNING & DEVELOPMENT

MPR3

A shortage in a market economy is a failure of the market to deliver useful goods to consumers. Market actors build for profit, not utility. If they can build in Halifax and sell the finished building at a profit to a pension fund in Ontario, that profit — the speed with which it is realized and its size — is the sole measure of success.

Builders will build as many “doors” (units) on a footprint as they can, as immediate and future profits are driven by this number (“doors”), not by actual consumer need. With no market regulation, studios, one-bedroom, and one bedroom plus an office, or units ideal for only short-term rental, will be the most profitable and therefore will be over-built. No effort is or will be made to match product to need as long as a greater profit will be made by ignoring need.

The Province’s solution to a market failure is, of course, more market freedom, which only places fewer restrictions on profitability and will encourage more market failure.

In short, anything you can do to stop, slow, impede, deflect, disrupt, sabotage, turn a blind eye to or just ignore this one, please do it:

for residential buildings that begin construction before April 1, 2027, provide that no requirement related to unit mix applies

Change “unit mix” requirements to a requirement that new buildings have a bedroom number mix reflecting “average family characteristics” in the HRM and you are on-side the new law:

Census families in private households by family size	122,865	<u>100%</u>	...
2 persons [insert proportions requiring 1 & 2 bdrms]	68,870	<u>56%</u>	...
3 persons [insert proportions requiring 2 & 3 bdrms]	25,960	<u>21%</u>	...
4 persons [insert proportions requiring 3 & 4 bdrms]	20,675	<u>17%</u>	...
5 or more persons [assume 4 + bedrooms]	7,360	<u>6%</u>	...

	<p>Or surrender, resign, or quit planning altogether.</p> <p>[name redacted] [redacted] Oakdale Court Dartmouth, NS</p> <hr/> <p>Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be anonymized and used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.</p> <p>If you wish to submit additional comments or withdraw your submission, please let us know by Feb 24.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR4	<p>Good afternoon,</p> <p>As a 38 year resident of Beaver Bank, I would like to express my concern about all the apartment buildings going up on Beaver Bank road.</p> <p>The reason for my concern is the continuous, heavy traffic congestion on Beaver Bank road every weekday morning and evening from Monday to Friday. As the only major road out of most of Beaver Bank, what would happen if there was ever a serious emergency, like a forest fire in the area. How would people be able to evacuate quickly if that were to happen. I am concerned that a lot of building is taking place without the proper road infrastructure to safely support it.</p> <p>Are there any plans to build new roads to accommodate all this growth of population in Beaver Bank?</p> <p>I look forward to your reply. Your truly, [name redacted] Greenforest Subdivision</p> <hr/> <p>Hello</p> <p>Thank you for your email. The Minimum Planning Requirements are provincial legislation related to housing supply and do not address traffic in Beaver Bank. However, I will keep your comments on file for future related work.</p>

	<p>You may be interested to read this HRM staff report which provides a good overview and outlines the Beaver Bank Bypass project: https://www.halifax.ca/media/85802</p> <p>Halifax Planning staff are proposing to undertake a Strategic Growth and Infrastructure Priority Plan as part of Phase 5 of the Regional Plan review. Future development in the Beaver Bank Area will be studied at that time, and will:</p> <ul style="list-style-type: none"> - Study population growth and settlement patterns to estimate which lands may be appropriate for new serviced development; - Consult with Halifax Water and HRM Infrastructure Planning to understand long-term plans for servicing and any constraints and opportunities in this area; - Consider and prioritize the need for increased community connections and emergency egress; - Consider environmental implications, such as watershed impacts, constraints such as floodplains and explore opportunities for landscape connectivity, consistent with the objectives of the Halifax Green Network Plan; - Consider mobility implications and opportunities for transit-oriented development, consistent with the objectives of the Integrated Mobility Plan. - Consider what public engagement will be required. <p>I'll also mention that the JRTA (https://jrta.ca/), is mandated with the development of a Regional Transportation Plan (RTP) that will identify the long-term transportation needs of HRM and the surrounding areas (generally encompassing a one-hour commuter shed beyond HRM). HRM Staff are actively involved with the JRTA at the executive and staff level. The RTP will consider a wide range of regional transportation infrastructure upgrades. The Plan will develop recommendations based on transportation demand modeling that is informed by updated population and employment forecasting. The Beaver Bank area falls within the study area of the JRTA, however, their report has not yet been released.</p> <p>I hope that this is informative.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR5	<p>Hey,</p> <p>I'm broadly supportive of these changes and I hope when sustainability is being legislated the findings of the 2013 Stantec report are considered.</p> <p>I think the 30% of the first floor commercial restriction is weird. I would encourage some sort of malicious compliance like basements count as the first floor or 2nd floor can be 100% commercial if there's public space on the first floor. Idk, something.</p>

	<p>Additionally, I'd love if the zoning allowed for ppl in my rural exurb to open third spaces (restaurants/cafes) in their primary residence as of right.</p> <p>[name redacted] Resident of District 2</p> <hr/> <p>Hello</p> <p>Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be anonymized and used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.</p> <p>If you wish to submit additional comments or withdraw your submission, please let us know by Feb 24.</p> <p>I'll mention that the Rural planning team is starting their work, and while still in the early days, they can be reached at ruralplan@halifax.ca.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR6	<p>The Urban Transit Boundary in Beaver Bank has to be extended back to our community's largest employer Ivy Meadows - Northwood and to support the many residents, especially seniors and youth, who need viable transportation alternatives to shop, work and get to appointments.</p> <p>The fact we lost this in the first place is unconscionable and needs to be rectified. The fact we have buses which sit idling at the BBKCC when they could be picking up residents who need them is just unbelievably stupid and a waste of money.</p> <p>With Margeson Drive planning to North Beaver Bank, Beaver Bank will be a growth area, however, we cannot wait for that process to happen, we need this service returned as soon as possible. Please do all within your power to make this happen quickly.</p> <p>Thank you sincerely, [name redacted] [redacted] Majestic Ave Beaver Bank, NS</p> <hr/> <p>Thank you for your email. The Minimum Planning Requirements are provincial legislation aimed at increasing housing supply and are not proposing changes to transit. However, I will keep your comments on file for future related work.</p>

	<p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR7	<p>Hello,</p> <p>The Urban Transit Boundary in Beaver Bank has to be extended back to our communities largest employer Ivy Meadows - Northwood. Also now the home of the Northwood Career College, advancing the Careers of CCAs in the province which is a priority of the NS government.</p> <p>With Margeson Drive planning to North Beaver Bank, Beaver Bank will be a growth area.</p> <p>Thank you [name redacted]</p> <hr/> <p>Thank you for your email. The Minimum Planning Requirements are provincial legislation aimed at increasing housing supply and are not proposing changes to transit. However, I will record your comments and keep them on file.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR8	<p>Hello,</p> <p>The Urban Transit Boundary in Beaver Bank has to be extended back to our communities largest employer Ivy Meadows - Northwood.</p> <p>With Margeson Drive planning to North Beaver Bank, Beaver Bank will be a growth area.</p> <p>Thank you [name redacted]</p> <hr/> <p>Thank you for your email. The Minimum Planning Requirements are provincial legislation aimed at increasing housing supply and are not proposing changes to transit. However, I will record your comments and keep them on file.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP</p>

	<p>PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
<p>MPR9</p>	<p>I hope my message does not fall on deaf ears! The bus going to Ivy Meadows a few years ago, it resulted in teens not able to get to part time jobs, nurses and other employees not having a way to get to work at Ivy Meadows. I feel no thought was given to the repercussions this would cause. It it time to get the bus running to Ivy Meadows once again.</p> <p>Respectfully submitted - [name redacted]</p> <hr/> <p>Thank you for your email. The Minimum Planning Requirements are provincial legislation aimed at increasing housing supply and are not proposing changes to transit. However, I will record your comments and keep them on file.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
<p>MPR10</p>	<p>Good morning,</p> <p>We received the email below asking for feedback regarding the minimum planning requirement regulations. The changes mandated by the province are short- sighted and will most certainly have a negative impact on the future of HRM's Main Streets & Downtowns, however, I'm not sure that there is value in our organization asking business owners and the local community to take the time to send feedback. If the municipality is required to implement the changes mandated by the province, will any feedback collected as part of the 30-day public consultation change the outcome? Or is the municipality simply hosting the 30-day public engagement because it is a requirement? My question is genuine. I realize HRM's hands are tied and I'm trying to determine if our efforts are better focused elsewhere.</p> <p>Thanks, [name redacted]</p> <hr/> <p>Thanks for reaching out. The municipality is required to comply with the provincial legislation. That said, we absolutely welcome any questions or comments from the business community and residents and will bring them forward in a report to Regional Council. We're focusing on information sharing, and folks are welcome to reach out with their thoughts on the requirements, comments on our approach, or just to ask questions.</p> <p>If you have any questions or comments, please let me know.</p>

	<p>Best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR11	<p>Bring back transit services to ALL of Beaver Bank. This service should not have ever been disrupted. If you want to discuss this further with me please don't hesitate to reach out.</p> <p>[name redacted] Born and raised Beaver Banker</p> <hr/> <p>Thank you for your email. The Minimum Planning Requirements are provincial legislation aimed at increasing housing supply and are not proposing changes to transit. However, I will absolutely record your comments and keep them on file.</p> <p>All the best,</p>
MPR12	<p>Good Evening,</p> <p>I am writing to provide comments for the public engagement period for the Minimum Planning changes in Halifax.</p> <p>Though I am generally in agreement with the changes I have concerns about the following two items:</p> <p>(h) for residential buildings that begin construction before April 1, 2027, provide that no requirement related to unit mix applies; The housing affordability crisis is largely a crisis of family sized housing units. If there is no requirement for developers to create 2, 3, 4+ bedroom units that can house families then we are no better off. If no requirements exist to create larger units, developers will create the smallest housing possible; ie: studio and single bedroom units. Halifax does not need the construction of studio units and one bedroom units. As can be seen in Toronto's housing market, studio and single bedroom units have struggled to sell/rent and provide stable long term housing as they do not promote families.</p> <p>(j) for multi-unit residential buildings that begin construction before April 1, 2027, not require that the ground floor consist of more than 20% commercial space; The buildings that will be constructed will be part of our communities for decades and generations. It is short sighted to remove requirements for commercial spaces in any large new builds. Promoting a mix of usable spaces on the ground level encourages walking, community engagement and lively commercial streets. It also creates economic incentive for lower commercial rents which would allow non-corporate/franchise local shops to be able to start up.</p>

	<p>Thank you for your consideration of these items.</p> <p>[name redacted] Dartmouth</p> <hr/> <p>Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be anonymized and used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.</p> <p>If you wish to submit additional comments or withdraw your submission, please let us know by Feb 24.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR13	<p>Hi. shapeyourcityhalifax. Suggestion: Re issuing building permits for new home construction. If the city would promote that people rough in a basement apartment in homes it would help reduce the housing crisis. Ex. Offer free building permits to those who will rough in a basement apartment. Thanks</p> <hr/> <p>Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be anonymized and used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.</p> <p>If you wish to submit additional comments or withdraw your submission, please let us know by Feb 24.</p> <p>While not an HRM program, I'll also mention that the Province has a backyard and secondary suites incentive program that may be of interest to you: https://beta.novascotia.ca/apply-funding-build-secondary-or-backyard-suite-your-property-secondary-and-backyard-suite-incentive-program</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>

<p>MPR14</p>	<p>Hello,</p> <p>I just saw this on a facebook ad and was wondering what effect, if any, these minimum planning changes will have on land designated "urban reserve."</p> <p>Thank you</p> <hr/> <p>Thanks for your email. The minimum planning requirements are not changing the status of urban reserve designated lands. Besides the general policy changes that give future direction in the Regional Plan, the regulations have limited or no impact for unserviced lots that permit only low density dwellings (typical of lots designated urban reserve).</p> <p>If you'd like to learn more about the requirements, you can visit our website here: https://www.shapeyourcityhalifax.ca/minimum-planning</p> <p>If you have any additional questions please let me know.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
<p>MPR15</p>	<p>Good evening,</p> <p>As a renter and resident of Halifax's regional centre, I'm writing to provide my feedback on the municipality's approach to implementing the updated minimum planning requirements as prescribed by the Province.</p> <p>I think that items A, B, C, D, G, I, J, K, and L are common-sense changes and the approaches outlined by the municipality will sufficiently meet the updated requirements.</p> <p>I have some concerns about items F and H relating to both the general recommendation given the province as well as HRM's approach to meeting the updated requirements. I worry that changing the density calculations for Conservation Design Developments will promote more sprawling, low-density, greenfield development in the municipality's rural areas, worsening the existing patterns of sprawl that exist on the outskirts of the serviceable boundary. The majority of HRM's policies and goals within its planning documents attempt to prevent unnecessary greenfield development and loosening the existing restrictions of the CDD pathway feels contradictory to the intent of the municipality. While we absolutely need more housing, new greenfield developments in areas that qualify for CDDs are unlikely to be of a substantial density to make a real impact on the current housing shortage while also being unlikely to be anywhere near affordable to the median prospective homebuyer.</p>

I also worry that removing the unit mixture requirements will contribute to long-term issues relating to affordability and livability as a large supply of one-bedroom apartments are injected into the current housing supply. One-bedroom units tend to cost more in rent per person compared to larger units that can be split between multiple roommates. An abundance of one-bedroom units (and a subsequent lack of multi-bedroom units) also makes it more difficult for families to find units that meet their needs, often forcing them into the few remaining (and expensive) units or outside of their desired neighbourhood.

Finally, I am most concerned about item E and more specifically, HRM's approach to meeting the updated requirement. The province is correct to attempt push along the suburban plan as currently, unlocking additional suburban density is perhaps the best way to increase housing supply in the municipality. Unfortunately, HRM's plan to only provide a work plan rather than any draft or complete document by the spring is simply unacceptable.

We are approaching the two year anniversary of the suburban plan's announcement and the public still has no clear idea of the work completed to date, the depth of changes anticipated, or any tentative release date for draft documents. The housing crisis is clearly an extraneous circumstance, necessitating an accelerated timeline for the suburban plan compared to other planning documents. It is not reassuring for the public to see only a work plan after nearly two years of assumed work.

Obviously, I understand that work has been ongoing in the background that the public has not seen. I also understand that the housing accelerator fund and suburban housing documents constituted a major drain on HRM's planning resources and delayed the SP. However, I also understand that the planning department at HRM is full of dozens of competent, intelligent, and forward-thinking planners who are more than capable of drafting the suburban plan ten-times over in the time that has passed since July 2023. I hope that given the current crunch, the municipality can take an "all-hands-on-deck" approach to the suburban plan to try and draft, release, and adopt it before the end of the year.

Thank you for taking the time to read through this feedback.

Kind regards,

Hello [name redacted],

Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be anonymized and used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.

If you wish to submit additional comments or withdraw your submission, please let us know by Feb 24.

	<p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR16	<p>Hello,</p> <p>The Urban Transit Boundary in Beaver Bank has to be extended back to our community's largest employer, Ivy Meadows - Northwood.</p> <p>With Margeson Drive planning to North Beaver Bank, Beaver Bank will be a growth area.</p> <p>Thank you, [name redacted] Beaver Bank</p> <hr/> <p>Hello [name redacted],</p> <p>Thank you for your email. The Minimum Planning Requirements are provincial legislation aimed at increasing housing supply and are not proposing changes to transit. However, I will absolutely record your comments and keep them on file.</p> <p>All the best, TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR17	<p>Hello,</p> <p>The Urban Transit Boundary in Beaver Bank has to be extended back to our communities largest employer Ivy Meadows - Northwood.</p> <p>Many Beaver Bank seniors have lost their freedom to travel back and forth since the service was taken away.</p> <p>With Margeson Drive planning to North Beaver Bank, Beaver Bank will be a growth area.</p> <p>Thank you</p> <p>[name redacted] [redacted] Beaver Bank Road</p> <hr/> <p>Hello [name redacted],</p>

	<p>Thank you for your email. The Minimum Planning Requirements are provincial legislation aimed at increasing housing supply and are not proposing changes to transit. However, I will record your comments and keep them on file for any future work.</p> <p>All the best, TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR18	<p>Regional Plan Team: I submitted this inquiry through 311 but it may be more properly submitted through you.</p> <p>Is there an updated deadline, from the Province of Nova Scotia, for the implementation of the Suburban Area Land Use By-law which can be updated in the Suburban Plan Factsheet? Does this deadline apply to the implementation of all the mandated changes from the Province?</p> <p>Thanks,</p> <p>Regional Plan Team: Acknowledging the most unrealistic deadline imposed on HRM to adopt a secondary municipal planning strategy and implement a land-use by-law for the Suburban Area, what is your expectation for the content of comments you may receive on the Suburban Plan and Land Use By-law during the Public Engagement period ending February 24 if there is no Suburban Plan and Land Use By-law to read?</p> <p>What is the timeline for "future planning engagement opportunities" as noted in the Suburban Plan Factsheet?</p> <p>In the Suburban Plan Factsheet, you note that "The Municipality continues to coordinate with the Province and other stakeholders on the development of the Suburban Plan.". Will these stakeholders include advocacy organizations which are focused on transforming how we move in HRM and building complete communities? Can you please provide a list?</p> <p>In the Suburban Plan Factsheet, you note that only the Regional Plan will be affected in the implementation of the Suburban Plan and Land Use By-law. Will not many plans and by-laws be affected in areas where the Suburban Plan will replace all or part of the current plans with the new Suburban Plan and By-law?</p> <p>Do you anticipate that the implementation of the Suburban Plan and Land Use By-law will occur in a phased or staged manner, geographical area by geographical area, or will the Plan and By-law be implemented all at once for the entire geographical extent of the Suburban Plan Area?</p>

You note in the Suburban Plan Factsheet that "The Suburban Housing Accelerator Plan and Land Use By-law was adopted in 2024 and is expected to be expanded in the Spring of 2025.". Does this expansion mean the rezoning of another set of site specific properties to the HA zone or similar which were not included in earlier rezonings, or, does the expansion mean comprehensive planning of selected geographical areas following the principles of the Regional Plan and HRM's Priority Plans?

The 'response' to the Minimum Planning Requirement for a Suburban Plan appears to fall short of the requirement mandated by the Province, i.e. "implementation of a land-use by-law for the area of the Municipality identified as the suburban area on the map". Acknowledging that the timeline (even as recently extended) for the mandated requirement is unrealistic, is your response satisfactory to the Province?

Thanks,

Hi [name redacted],

Thanks for your email and questions, I've heard back from my suburban team colleagues.

The current 30-day public engagement period for the Minimum Planning Requirements is intended to share information with the public about how the municipality is going to comply with the minimum planning requirements. However, the public engagement period for the MPR is not replacing any engagement for the Suburban Plan. Staff are working with the Province on how to address the Suburban Planning deadline and further information will be forthcoming when we bring a report on the Suburban Plan work plan to Regional Council this Spring. Staff are not able to share more details on that report until it is published on the council agenda but we will send an update to the mailing list for the Suburban Plan when it is available for your review.

As you noted, some additional sites are currently being considered for re-zoning to the HA zone in the Suburban Housing Accelerator Bylaw. This is responding to direction from Regional Council to consider these additional site-specific requests in the Regional Centre and Suburban Area - more information is available on this website: <https://www.halifax.ca/about-halifax/regional-community-planning/housing-accelerator-fund/urgent-changes-planning>. The suburban plan team can also be reached at suburbanplan@halifax.ca if you have any questions about those sites.

All the best,

TELINA DEBLY | MCIP, LPP
PLANNER II
REGIONAL PLANNING | PLANNING & DEVELOPMENT

	<p>Telina: Thanks for this further information. I may be wrong but I believe that you may still be able to provide answers to some of the other questions I asked, including these: In the Suburban Plan Factsheet, you note that "The Municipality continues to coordinate with the Province and other stakeholders on the development of the Suburban Plan.". Will these stakeholders include advocacy organizations which are focused on transforming how we move in HRM and building complete communities? Can you please provide a list? In the Suburban Plan Factsheet, you note that only the Regional Plan will be affected in the implementation of the Suburban Plan and Land Use By-law. Will not many plans and by-laws be affected in areas where the Suburban Plan will replace all or part of the current plans with the new Suburban Plan and By-law? Do you anticipate that the implementation of the Suburban Plan and Land Use By-law will occur in a phased or staged manner, geographical area by geographical area, or will the Plan and By-law be implemented all at once for the entire geographical extent of the Suburban Plan Area? Thanks again,</p> <hr/> <p>Hi [name redacted]</p> <p>To clarify the factsheet, the Regional Plan is being amended immediately in response to the minimum planning requirements to reflect the intent to develop a suburban plan. The suburban plan will come later as a separate process and impact all the current suburban area plans and bylaws, as you've described.</p> <p>I unfortunately don't have any additional information to share about the suburban plan in advance of the report being published on the council agenda.</p> <p>Best, Telina</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR19	<p>[phone call] <i>Staff summary:</i> Reg (c) - doesn't agree with approach to include zones that allow residential by DA, wants to see a more detailed breakdown. Would have liked to see more in-person engagement as part of this.</p>
MPR20	<p>Hello Telina,</p> <p>Thanks for the call, and for all the work you and the team are doing to update policies & regulations at HRM. Truly impactful work.</p>

As discussed on the phone, I have been a bit dismayed at the idea that Development Agreement rights were considered to meet the minimum standard of “permit residential uses in all zones ...”.

My specific requests/questions;

1. Can you confirm that this is the position at HRM? E.g. That if a zone includes a path to residential permission via a Development Agreement or other discretionary process it was considered to already meet that minimum standard?
2. The fact sheet’s three bullet points focus on the percentage of properties (that are targeted by the new minimum standard) that currently meet the interpretation, can you advise what portion of these properties only have a path to residential allowance via a discretionary process?
3. What is the total number of properties being used in the calculation?
4. In the “percentage” referenced, is that a percentage counting gross number of properties, or a percentage of the land mass that those properties cover? E.g. is a 17 hectare site considered “equally weighted” to a 3,500 square foot site when counting the two categories that were used in coming up with the 99.8% figure?

Thanks for answering these questions, it will help me engage with your process.

Regards,
[name redacted]

Hi [redacted],

Thanks for your patience.

We have presented the below approach to the Province and are happy to accept and consider any feedback during this public engagement period. It would be helpful to understand if there are specific zones or places you’re interested in, so we can compare with what we’re proposing.

Feel free to give me a call if you’d like to discuss.

Thanks,
Leah

- 1. Can you confirm that this is the position at HRM? E.g. That if a zone includes a path to residential permission via a Development Agreement or other discretionary process it was considered to already meet that minimum standard?**

The team reviewed all of HRM’s zones and identified what they permitted. Zones that require development agreements for residential are generally:

- Zones applied to areas that are required to be developed comprehensively, and typically include planning for infrastructure as part of the process

- Zones that have already developed and have existing DA's (like the Brunello subdivision in Timberlea, or Portland Hills);
- The C-3 zone in Cole Harbour applied to the existing Sobeys site on Cole Harbour Road, which could be a candidate for increased density through redevelopment once considered through the Suburban Plan.

See the table at the bottom of this email for the full list of zones, the number of the properties in each zone, plus a snip from a webmap showing where all the properties are (blue shading).

Given the complexity of our zoning framework, we are proposing that amending these zones (and determining appropriate residential densities for each) is best managed through the Suburban Plan process, or through current active planning processes (for example, Paper Mill Lake).

2. *The fact sheet's three bullet points focus on the percentage of properties (that are targeted by the new minimum standard) that currently meet the interpretation, can you advise what portion of these properties only have a path to residential allowance via a discretionary process?*
3. *What is the total number of properties being used in the calculation?*
4. *In the "percentage" referenced, is that a percentage counting gross number of properties, or a percentage of the land mass that those properties cover? E.g. is a 17 hectare site considered "equally weighted" to a 3,500 square foot site when counting the two categories that were used in coming up with the 99.8% figure?*

Total Parcels in HRM: 157,998

Total Parcels after areas zoned for non-residential uses exempted from the regulation were removed: 152,898

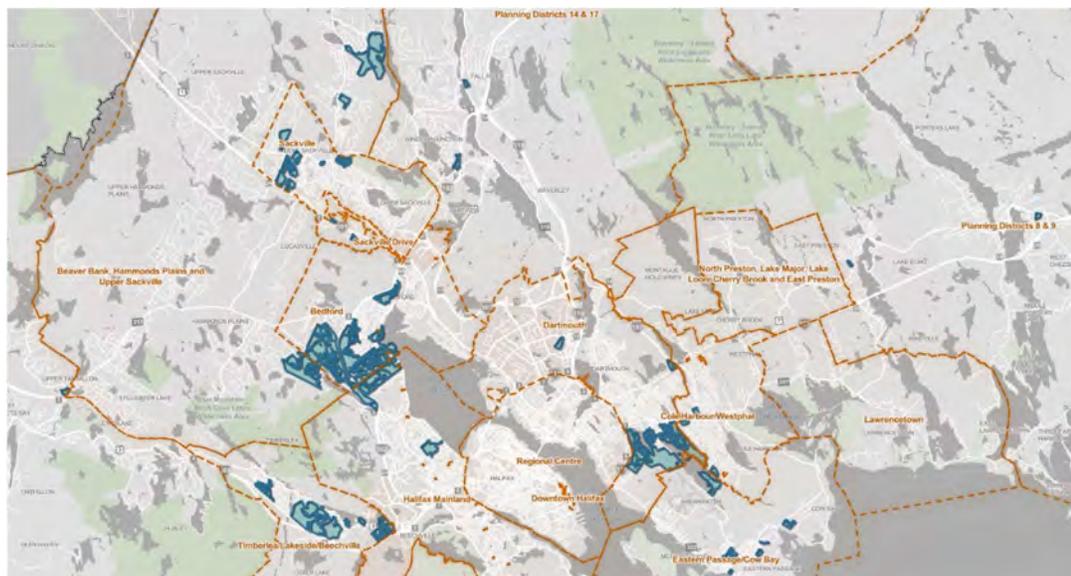
Remaining parcels that do allow residential uses: 152,661 (99.8%)

The total number of parcels of that **152,661** that allow residential only by DA is: **8,400**.

This represents about **5.5%** of total parcels that enable residential.

LUB	ZONES	Number of properties
BB, HP, US	CDD (Comprehensive Development District Zone)	98
	BWCDD (Bedford West Comprehensive Development District Zone)	620
Bedford	WFCDD (Waterfront CDD)	58
	CCDD (Commercial CDD)	49
	RCDD (Residential CDD)	733
	BSCDD (Bedford South CDD)	765
	BWCDD (Bedford West CDD)	983

Cole Harbour/ Westphal	C-3 (Shopping Centre)	5
	CDD	16
Dartmouth	CDD	1501
	BCDD (Burnside CDD)	3
Eastern Passage / Cow Bay	CDD	241
Halifax Mainland	WCCDD (Western Common CDD)	N/A
	BWCCD (Bedford West CDD)	225
	SRCCD (Seton Ridge CDD)	3
	WCDD (Wentworth CDD)	380
Lawrencetown	CDD	N/A
NP/LM/LL/CB/E P	CDD	N/A
Planning District 4	CDD	N/A
Planning Districts 1&3 (St. Marg)	CDD	3
District 14/17	VC-CDD (Village Core CDD)	1
	RCDD	6
Planning Districts 8 and 9	CDD	2
Sackville	CDD	950
Timberlea/Lake side/ Beechville	CDD	1758



LEAH PERRIN, MCIP LPP

	<p>SHE/HER</p> <p>MANAGER, REGIONAL PLANNING REGIONAL & COMMUNITY PLANNING PLANNING & DEVELOPMENT</p>
MPR21	<p>Hello,</p> <p>The Urban Transit Boundary in Beaver Bank has to be extended back to our communities largest employer Ivy Meadows - Northwood.</p> <p>With Margeson Drive planning to North Beaver Bank, Beaver Bank will be a growth area.</p> <p>Regards,</p> <p>[name redacted]</p> <hr/> <p>Hello [redacted],</p> <p>Thank you for your email. The Minimum Planning Requirements are provincial legislation aimed at increasing housing supply and are not making changes to transit. However, I will absolutely record your comments and keep them on file.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR22	<p>Hello,</p> <p>The Urban Transit Boundary in Beaver Bank must to be extended back to our communities largest employer Ivy Meadows - Northwood. My mother currently resides at Ivy Meadows. We desperately need bus to go there. There is many staff that require transportation to and from the facility. I am also a local real estate agent that lives in Beaver Bank most homes past Kinsac are having a hard time selling because there's no bus available to the residence.</p> <p>With Margeson Drive planning to North Beaver Bank, Beaver Bank will be a growth area.</p> <p>Thank you</p> <p>Thanks [name redacted] REALTOR®</p>

	<p>Hello [redacted],</p> <p>Thank you for your email. The Minimum Planning Requirements are provincial legislation aimed at increasing housing supply and are not making changes to transit. However, I will absolutely record your comments and keep them on file.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR23	<p>Hello,</p> <p>The Urban Transit Boundary in Beaver Bank has to be extended back to our communities largest employer Ivy Meadows - Northwood.</p> <p>With Margeson Drive planning to North Beaver Bank, Beaver Bank will be a growth area.</p> <p>Thank you</p> <hr/> <p>Hello [name redacted],</p> <p>Thank you for your email. The Minimum Planning Requirements are provincial legislation aimed at increasing housing supply and are not proposing changes to transit. However, I will absolutely record your comments and keep them on file.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR24	<p>To Whom it Concern,</p> <p>I am writing you this evening in support of bringing the bus route back to Ivy Meadows in Beaver Bank. The long-term care facility hosts the home of the Northwood Career College, a Private Career College offering the CCA program to student applicants. A bus route to this facility also offers up an opportunity to host student placements for CCA students requiring practicum clinical and mentorship placements. Recruitment for students is a challenge without a bus route because of its remote community location.. The DSLTC have have a big investment in educating and employing CCAs to meet the demands of our aging population.</p> <p>Please reach out to me so we can discuss opportunities to bring the bus route back. I have watched the morning and afternoon bus route and notice that the bus sits idling</p>

	<p>at the Kinsac Community Center. The time spent sitting there, would be the same time frame to have the bus to commute the 7 minute drive to the facility.</p> <p>Looking forward to hearing from you.</p> <p>[name redacted]</p> <p>[redacted], Northwood Career College</p> <hr/> <p>Hello [redacted],</p> <p>Thank you for your email. The Minimum Planning Requirements are provincial legislation aimed at increasing housing supply and are not proposing changes to transit. However, I will absolutely record your comments and keep them on file.</p> <p>All the best,</p>
MPR25	<p>Hello, The Urban Transit Boundary in Beaver Bank has to be extended back to our communities largest employer Ivy Meadows - Northwood.</p> <p>With Margeson Drive planning to North Beaver Bank, Beaver Bank will be a growth area. Thank you</p> <hr/> <p>Hello,</p> <p>Thank you for your email. The Minimum Planning Requirements are provincial legislation aimed at increasing housing supply and are not proposing changes to transit. However, I will record your comments and keep them on file.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR26	<p>Hi, I am writing to express my strong support for the extension of the Urban Transit Boundary to include our community’s largest employer, Ivy Meadows – Northwood, in Beaver Bank. With the planned development of Margeson Drive extending to North Beaver Bank, our community is poised for significant growth, and this expansion would provide much-needed transportation options for residents and workers alike. Thank you for your time and consideration of this important matter.</p>

	<p>Kind regards, [name redacted]</p> <hr/> <p>Hi [name redacted],</p> <p>Thank you for your email. The Minimum Planning Requirements are provincial legislation aimed at increasing housing supply and are not proposing changes to transit. However, I will absolutely record your comments and keep them on file for future work.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR27	<p>Dear council</p> <p>While I have attended many public planning events over the last year and I have spent considerable time perusing your website I find trying to get any concrete information about exactly what this city plans to do to provide suitable housing as a human right to seniors, disabled, new Canadians, students and other marginalized people is unsatisfactory. Telling people that we are missing middle buildings is not acceptable. Quit frankly that word is over used.</p> <p>What people need to know is the exact description of affordable housing within certain income brackets and then make sure you have housing for them. This city and the province have a fiduciary obligation to its citizens to be forth coming. Relying on private developers will not suffice although it is very common knowledge that they prefer to build rentals over condos because they are more profitable for them. So let's start there.</p> <p>Our provincial government has proven time and time again that they don't care about our most vulnerable population that I just mentioned above. They have shown their colors by giving absorbent rent increases that they can not afford. They have given landlords full control of evicting tenants when they want to and with no fault of the tenant. That leaves the city responsible for a lot of people with insecure housing.</p> <p>The only solution is with bylaws</p> <p>With the new housing plan the city needs to put in place restrictions on the numbers of units with bedrooms. There should be a certain percentage single, double, triple and accessible units. The most popular is a two bedroom so people can share accommodations rather than smaller units where people have to rent in their own and risk being evicted because they can't afford the high rent. Seniors need one bedrooms and there are plenty of units being built in 50 plus buildings so the larger buildings don't need as many.</p>

Market rent should have nothing to do with affordable housing. That ship has sailed as you let the rents get so high and wages have not kept up. A certain percentage of each building should have affordable units and stop letting the builders pay fines if they don't. They have shown us that a 25k fine is nothing to them and they just pass the cost to the tenants. They won't stop building because they are getting too rich to do that.

Stop building out the city and build up and add transit, bike lanes and pedestrian streets. A new ferry from Bedford that can only hold 200 people per trip when you have thousands trying to get downtown during rush hour is not going to solve this. A commute rail would .

Do what Helsinki Finland did and declare a state of emergency so you can bypass and fast-track processes. We did that during the pandemic why is it so difficult for housing? We are still losing lives on the streets , IPV is increasing and people are falling into despair. Landlords are taking advantage of people by using unfair practices to overinflate rents which over inflates values.

I would also suggest you look to Switzerland for advice. They too solved a housing crisis by stepping in when landlords fall behind in repairs and following through with inspections, large fines and tracking offenders. But you have to follow through with liens and inspections.

Open the landlord registry to the public so people can see who the offenders are and make informed decisions before they sign a lease. Protecting citizens with an open registry would stop landlords from setting up practices like setting the rent by the numbers of people living in the unit. There should be a maximum rent set per unit depending on the number of rooms and amenities .

Building codes need to be reviewed when it comes to converting commercial to residential so more old office space can be utilized. Preservation of the front of a building due to heritage rather than house people is a thing if the past.

Demolition of older buildings should not be given permits without issuing a building permit and vacant lot penalties should be set at high rates. Demovictions and renovictions need to be proven violations of the M200 bylaw before they are allowed and costs paid to the tenant so they can afford to move. Refunds of damage deposits to tenants needs to be enforced so landlords stop keeping peoples money for normal wear and tear. All of these things are leaving people on the streets.

This crisis is not just supply and demand but it is man made by letting developers control the narrative on property values and the govt relying on the financialisation of Real estate through Reits . The higher the rent the higher the value of the property and the more equity they have . Relying on reits to support pension plans govt and personal has helped create this crisis. I do recognize that this can't be controlled by the city and that's why council needs to step in with other temporary measures .

	<p>This city needs to get tough on bylaws for building rentals. No one can afford to save for a down payment on a home let alone buy one. The percentage of home owners will be decreasing as time goes on . The more people we have paying high rents the less money goes into the economy such as small businesses . more people will be falling into financial distress and the more issues the city will have.</p> <p>Housing is healthcare and that should be first and foremost in mind.</p> <p>Regards</p> <hr/> <p>Hello</p> <p>Thank you for sharing your thoughts on these issues. I will absolutely keep your comments on file. Do you wish to submit this correspondence in response to the changes the municipality is making to comply with the provincial Minimum Planning Requirements?</p> <p>Comments will be anonymized and used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process. Please let me know by Feb 24.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p> <hr/> <p>Yes please in response you your question.</p> <p>Regards</p> <hr/> <p>Thank you [redacted], we will be sure to include this submission in the staff report.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR28	<p>[Phone call]</p> <p><i>Staff summary:</i> Supportive of the CDD changes, works with clients who will likely benefit from the increased density calculation. Is also interested in seeing more low rise multiris in the rural areas, like townhouses.</p>

MPR29	<p>Greetings,</p> <p>I have made numerous complaints to the following:</p> <ul style="list-style-type: none">-311-councilor of district 15-JRT <p>I see on this plan that more housing is happening in the Beaverbank area. This is great for growth. However the one way in and out, is a major concern.</p> <p>HRM needs to be highly motivated to make a change and connect Beaverbank to other routes.</p> <p>This is unsafe for the people who live in Lower Sackville, Beaverbank and Middle Sackville. Please we are all begging you to take our concerns seriously.</p> <p>I have asked for digital traffic controls to curb speeding on the Beaverbank road. I see they have been placed on Sackville Drive. I am confused as to why this has not happened for Beaverbank road.</p> <p>There are large trucks who use air brakes, HRM busses who appear to be surpassing the 50KM speed limit as well as other drivers.</p> <p>Individuals who live off of Beaverbank road, who do not have a traffic light wait an unacceptable time to get onto the road to get to work because the traffic is insane.</p> <hr/> <p>Hello [name redacted]</p> <p>Thank you for your email. The Minimum Planning Requirements are provincial legislation aimed at increasing housing supply and are not changing regulations for roads or traffic in Beaver Bank. However, I will record your comments and keep them on file for any future work.</p> <p>I'll also mention that while you may have already seen it, this 2024 staff report about the Beaver Bank Bypass project may be of interest to you: https://cdn.halifax.ca/sites/default/files/documents/city-hall/regional-council/240319rci04.pdfcontinued</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p> <hr/>
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	<p>Thank you so much for your email, and clarification. I have read the document quite some time ago, and was hoping I would see changes implemented in this fiscal year. Sigh...</p> <p>I will keep asking and pursuing until the people responsible for the changes will take action to this area's concerns.</p> <p>Again, I appreciate your response. I am looking forward to growth with housing etc fingers crossed the roads will come with all of the growth.</p>
MPR30	<p>I had a couple of questions for clarification about the proposed changes to the CDD process.</p> <p>On the municipal website, it says the the changes are around density, which is fantastic. I'm curious if any of the other requirments are being removed? Most notably, the requirment that the property have existed in its current form since April 29, 2006 and if the maximum number of units outside of the growth area is still 30?</p> <p>[name redacted]</p> <hr/> <p>Hello [redacted],</p> <p>Thanks for your email. At this time, we're only making the change required by the minimum planning legislation (re: using gross instead of net area to calculate density for developments commencing construction before April 1, 2027).</p> <p>I'm happy to connect you with Jess Harper, cc'd, who is a Principal Planner with our Rural Policy and Applications team. Please feel free to share any comments or feedback you have about the CDD policies in general with her team.</p> <p>All the best,</p> <hr/> <p>Without changing the ability to make lot assemblies, this change won't result in much development which I guess is the point.</p> <p>[name redacted]</p>
MPR31	<p>PLEASE!!! change the zoning laws in District 4 Prospect (specifically Hatchet Lake & lots zoned RB-1) to allow for a secondary suite in a family's home TO EXCEED 80 sq metres or 861 sq feet. There should be no restriction on secondary suites. There is no rhyme or reason for these restrictions, as Hatchet Lake is currently a mix of duplexes & single family homes, with different zones within the same zoning area. Makes no sense. I am a senior looking to have a full basement suite with my daughter, to allow for shared housing on the same lot. The lots are bigger than the city, and 1 extra person in a basement apartment will not affect the well or septic. Please consider the seniors requiring reasonable housing.</p>

	<p>Hello [redacted],</p> <p>Thank you for your email. The Minimum Planning Requirements are provincial legislation and are not making changes to regulations for secondary suites. However, I will make sure to record your comments and keep them on file for any future work.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR32	<p>[Councillor Austin January 2025 Newsletter]</p> <p>Minimum Planning Requirements</p> <p>HRM has opened public engagement on changes that the Province is mandating that HRM make to our planning bylaws. For the most part, this doesn't affect the Regional Centre that much because much of what is being mandated was already done through the Centre Plan. Changes such as counting height in storeys rather than meters so as to not disadvantage timber construction, and eliminating parking requirements have already happened in Dartmouth Centre. This mostly a bigger deal for the suburbs where HRM's Suburban Plan hasn't been completed.</p> <p>That said, there are three issues that I'm concerned with:</p> <ul style="list-style-type: none"> • A requirement to consider prioritizing housing above all else (what this might mean for environmentally sensitive areas or HRM's ability to direct development to the best locations is a bit unknown) • A temporary relaxation of the usual requirement for a mix of units in new development. Someone could build a building all of 1 bedrooms versus the usual requirements that HRM mandates 2 and 3 bedrooms as well • A temporary removal of the requirement for groundfloor commercial in new development, which could be problematic on main streets where whatever is built will be around for decades and the municipality wants an attractive streetscape <p>This public consultation is more informational on this one. HRM might be able to shift some of the details, but the overall direction isn't optional. It's being imposed by the Province. For more information, check out the Shape Your City page here.</p>
MPR33	<p>[phone call]</p> <p><i>Staff summary:</i> Comments on the requirements:</p> <p>Requirement A - The province should allow HRM to take over the housing portfolio and build its own affordable housing.</p> <p>Requirement B - Housing should be accessible as well, we have the highest rate of disability per capita in Canada</p> <p>Requirement C- Burnside should allow residential</p> <p>Requirement E - Suburban plan should address the environment and water, allow more medium size apartments</p>

	<p>Requirement F - Supportive of this change.</p> <p>Requirement H - Problem with removing the unit mix is that families, people with disabilities, single parents, etc. who are low income get turned away from CMHC support for apartments because the bedroom count is too low for the number of residents. This makes the housing crisis worse as people can't find housing that meets their needs and qualifies for support. Toronto experiencing re-selling of micro condos – this change doesn't help the housing crisis.</p> <p>Requirement I - Wants to see more electric charging opportunities for the parking that is provided. Supportive of solar panels over parking lots</p> <p>Requirement J - There are many benefits to ground floor commercial, increases commercial opportunities, walkability, healthy communities from a public health perspective</p> <p>Requirement L - As long as people have to convert shipping containers and get permits to avoid safety issues around heating/cooling, no problem with this.</p>
MPR34	<p>Staff Note: See MPR32 for the newsletter.</p> <hr/> <p>Please see Sam Austin's excellent comments on this. I would add, what is the expertise of the province to make such changes? Perhaps a simple rewording of the sections noted by Sam could fix a lot of potential problems for HRM in future?</p> <p>[name redacted]</p> <hr/> <p>Hello [redacted],</p> <p>Thank you for forwarding Councillor Austin's comments and sharing your thoughts on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be anonymized and used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.</p> <p>I'll add that the Minimum Planning Requirements legislation is provincial, so the municipality cannot change the exact wording of the requirements. If you have any comments on our approach to meeting the requirements, or any additional thoughts to share, please let us know by Feb 24. The project website is linked here: https://www.shapeyourcityhalifax.ca/minimum-planning</p> <p>All the best, TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p> <hr/> <p>Thanks for getting back to me. I've yet to hear from the province.</p> <p>[name redacted]</p>

MPR35	<p>Good afternoon,</p> <p>I wanted to reach out with a few comments on the new changes. Thank you for the opportunity to participate in these changes.</p> <p>1. I fully support the regulation change on parking. By definition a municipality has high density, and services, this density can be supported and capitalized on by reducing car reliance. I look forward to how this change impacts HRM's approach and commitment to public transit.</p> <ul style="list-style-type: none"> - As a young woman who has had to go to great lengths to renovate her 1000sqst condo to be a two bedroom for a young family, I heavily encourage that unit mix is still adhered to. Apartments, condos, townhouses, and generally small spaces are not just for bachelors and couples. We need to be creative in our spaces so that families can continue to live in the core of HRM. - The height by the number of stories is a wonderful change. I hope that more buildings have greater ceiling heights! Higher ceilings is a way to increase the feel of the space when it may have a smaller footprint. <p>Lastly, a possible change to consider is reducing the conditions of completion. All safety measures should stay in place, like balcony conditions for occupancy, however, not all walls should need to be painted, cabinets up etc. In Poland, it's common practice to leave units as shells for new occupants to add their personal flair. This helps save time and materials.</p> <p>Thanks so much ! [name redacted]</p> <hr/> <p>Hello [redacted],</p> <p>Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be anonymized and used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.</p> <p>If you wish to submit additional comments or withdraw your submission, please let us know by Feb 24.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR36	<p>[phone call]</p> <p><i>Staff summary:</i> Questions about how the minimum planning requirements are different than the HAF amendments and the suburban plan and what areas are being impacted by the different changes and plans.</p>

MPR37	<p>Mixing a web page with PDFs makes consuming the content more difficult than needed. Including the 1-2 paragraph explanation from the pdfs on the webpage would save people headaches.</p> <hr/> <p>Hi [redacted],</p> <p>Thank you for the feedback.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR38	<p>How about Halifax and the province stop the rapid immigration then we wouldn't need high rises, low rises etc all over the place. This is all about doubling the population of Halifax and the province and then using the apartment buildings as a tool to introduce 15 minute cities. We will need 15 minute cities to address the traffic congestion which wouldn't have become an issue if we weren't doubling the population.</p> <p>[name redacted]</p> <hr/> <p>Hello [redacted],</p> <p>Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be anonymized and used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.</p> <p>If you wish to submit additional comments or withdraw your submission, please let us know by Feb 24.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR39	<p>Hello,</p> <p>The Urban Transit Boundary in Beaver Bank has to be extended back to our communities largest employer Ivy Meadows - Northwood. With Margeson Drive planning to North Beaver Bank, Beaver Bank will be a growth area.</p> <p>Thank you</p>

	<p>Hello [redacted],</p> <p>Thank you for your email. The Minimum Planning Requirements are provincial legislation aimed at increasing housing supply and are not proposing changes to transit. However, I will absolutely record your comments and keep them on file.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR40	<p>Hello,</p> <p>The Urban Transit Boundary in Beaver Bank has to be extended back to our communities largest employer Ivy Meadows - Northwood. With Margeson Drive planning to North Beaver Bank, Beaver Bank will be a growth area.</p> <p>Thank you [name redacted]</p> <hr/> <p>Hello [redacted],</p> <p>Thank you for your email. The Minimum Planning Requirements are provincial legislation aimed at increasing housing supply and are not proposing changes to transit. However, I will absolutely record your comments and keep them on file.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR41	<p>Thanks for the opportunity to respond. If used appropriately, these changes can be turned into a step toward achieving urban renewal, sustainability and affordability.</p> <p>In all such exercises, we should start from broad principles supporting the planning policies, and use planning tools supported by the best evidence. The broad principle in this context is to help create healthy, vibrant and empowered communities, and should be the common interpretation of what the document refers to as "safe, sustainable and affordable housing in the Municipality". Planning tools necessary to achieve these goals must be consistent with this principle. Wide multi-lane streets, "low" population densities, high rise buildings that block natural light and create wind tunnels, a lack of parks, playgrounds, and naturalized corridors, and public spaces, a lack of public transit options, a lack of sidewalks for people walking and rolling and protected and separate lanes for people cycling and using micro-mobility devices,</p>

vehicle noise and pollution all contradict the basic principles we agreed on. The evidence supporting this conclusion is widely available.

So, a plan must decide whether what height restrictions should be imposed to make a neighborhood sustainable and livable. Evidence shows that high rise buildings without sufficient setbacks are not necessarily the solution here: they take longer to build, block natural light at the street level, super charge delivery truck and car traffic, and generate street level wind tunnels that can be treacherous for seniors and people with disabilities. These consequences of a high-rise building contradict the premises of the exercise. The solution is to address the "missing middle": this is not an overused cliché, but a reality in Halifax.

A plan must also decide how much on-site parking will be required. At least in the urban centre, there should be a penalty for building on-site parking. On-site parking adds tremendously to costs of building (contradicts affordability) and takes longer to build. It encourages car-centered street designs. So, on-site and street parking contradict the main premises of this planning exercise and should be discouraged.

A plan must recognize that people living in these buildings are humans with real needs such as affordable and nutritious food, outdoor activities, and social interactions, all of which require safe, calm, and relaxing natural and built environments, consistent with the premises of this planning exercise. A lack of commercial space to install a food outlet, a cafe, or a yoga studio, wide multi-lane roads, a lack of "green" spaces, a lack of protected and separated from traffic bicycle lanes undermine and contradict all these goals. So, a planning permit where such amenities do not exist must automatically trigger space reallocation, street or otherwise, to human needs commensurate with these goals. A new building should "give back" to the community.

Planners have all the tools and evidence necessary to achieve these goals, as long as they put people before profits, cars, and greed.

Respectfully submitted,
[name redacted]
(West End Halifax)

Hello [redacted],

Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be anonymized and used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.

If you wish to submit additional comments or withdraw your submission, please let us know by Feb 24.

All the best,

	<p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
<p>MPR42</p>	<p>Hello Anne, I am a resident of Brookside and participated in the public hearing of the future of the Halifax Exhibition Park. So, this will interfere with my commute to work tremendously. I have observed the development of Prospect Road over the past 25 years. At this point, I have tried to read and understand some of your published campaigns. As a general observation, I read about the housing problem for low-income citizens. Looking at the big builders in HRM, I don't see any of those projects coming up in big numbers.</p> <p>I was of the opinion that the planning commission sets the rules. Can you not enforce a certain percentage of those being built while allowing the builders to build one high riser after another?</p> <p>So far, I see a lot of commercial spaces in new construction not being used. And those have been mandated by the planning commission. The builders cannot stop building. Even if the outlook is bad (N.S. doomed to decline unless economic trends reverse: report, The Canadian Press · Posted: Feb 12, 2014).</p> <p>So, in other words, they will keep building even with more demands from your side. The reason for that is the wright off of the costs of new buildings against the profits of the finished buildings. My understanding is that the owners of the building companies can manage to pay very little income tax over decades. You can see that in the last 25 years in HRM. During the economic downturn around 2008, there was no significant slowdown (Halifax's major construction has almost tripled in value over a decade, · CBC News · Posted: Apr 18, 2016).</p> <p>I would say, now is the time to push the on your end to solve the “housing crises” in HRM (Large Halifax landlords report double-digit operating income growth in first quarter of 2024, CBC News · Posted: May 15, 2024).</p> <p>There should be some room for this in the proposed 6,800 units at the Halifax Exhibition Centre.</p> <p>Thank you for your attention, [name redacted]</p> <hr/> <p>Hello [redacted],</p> <p>Thanks for your email. The Minimum Planning Requirements are provincial legislation aimed at increasing housing supply and are not proposing changes to the Halifax Exhibition centre development. More information about the regulations in the minimum planning requirements can be found on our project website:</p>

	<p>https://www.shapeyourcityhalifax.ca/minimum-planning. If you have any comments or questions about those requirements please let us know. I am copying Meaghan Maund (maundm@halifax.ca) who is the planner for the Halifax Exhibition centre development, to share your comments about that project.</p> <p>All the best, TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR43	<p>Hello,</p> <p>I have a few questions about the Municipal response to the new Minimum Planning Requirements outlined by the Province. I am referencing the information sheets on the Shape Your City Halifax page on this matter.</p> <p>Firstly, please note, this particular page https://www.shapeyourcityhalifax.ca/minimum-planning/ was not actually possible to find directly from the Shape Your City page, I only saw it through an Instagram ad and could not find it directly through the website as a non-registered visitor (which is probably the majority of site visitors). This is a note for those managing the Shape Your City website to be fixed. If there IS a way to navigate there, it's not readily accessible enough.</p> <p>On the Minimum Planning Requirements: Item (c) references 99.8% of properties already meeting the new requirement, with 0.2% of properties not meeting the requirement. Is there a link to this particular report so I can see which properties are in the 0.2%? It seems likely the intent of the Provincial regulation may be to force the Municipality to properly enable development of this small number of properties, taking control out of the hands of local special interest groups. Sharing which properties the Municipality may be trying to skirt this deregulation effort for is an important accountability piece here.</p> <p>Item (g) states that the Municipality should "not impose maximum height restrictions in a manner that negatively affects the density of residential buildings using mass timber or any other construction method;" this seems like an explicit call to remove maximum height requirements, and yet the Municipal response appears to simply be a change to measuring height in storeys instead of metres. Are height limits being removed or just measured differently? And if it's the latter, how does this even pretend to meet the Provincial Minimum Requirement?</p> <p>Item (h) requires that "no requirement related to unit mix applies". Does "unit mix" in the Provincial regulation only refer to unit mix by number of bedrooms, or does it also disallow unit mix requirements for, say, X number of "affordable" units? Thanks for your time. I look forward to further engagement, it seems higher levels of Government are finally taking the experts seriously on how to fix the housing shortage.</p>

	<p>Kindly, [name redacted]</p> <hr/> <p>Hello [redacted],</p> <p>Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be anonymized and used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process. If you wish to submit additional comments or withdraw your submission, please let us know by Feb 24.</p> <p>Thank you for mentioning the shape your city page issue, we've had that fixed.</p> <p>For requirement (c), the 0.2% are these land use bylaws and zones: -Dartmouth, C-3 -Halifax Mainland, C-2 -Planning District 4 (Prospect), CR-2 -Sackville Drive, LS, DC-1, DC-2</p> <p>These are properties that are currently zoned for commercial use and could have the potential to also have high density residential. These sites will be studied further as part of the Suburban Plan and will require technical studies to understand the infrastructure needed to support future growth prior to enabling additional uses.</p> <p>To meet requirement (g), height for medium and high density residential buildings will be measured in stories instead of metres or feet. This helps achieve more density and makes mass timber more feasible as a construction method, as it tends to require more space per storey. The change allows mid and high density buildings to achieve their full allowed height in storeys, instead of (for example) having to omit an entire storey because the building would exceed a metric height maximum by a metre.</p> <p>Requirement (h) refers specifically to the mix of 1, 2, and 3+ bedrooms in an apartment building.</p> <p>Please let me know if you have any additional questions or comments.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR44	<p>Good morning. In regards to the minimum planning changes in Halifax, and this statement:</p> <p>“require that priority be given to increasing the supply of safe, sustainable and affordable housing in the Municipality over other interests identified in the municipal</p>

planning strategy for the purposes of all processes, approvals and decisions made under the municipal planning strategy;”

How will the Municipality and / or the Province police the availability of “affordable” housing, and what financial criteria is being used to determine what is “affordable”. My concern is not for the low income or vulnerable people specifically, as I believe much is being done to assist them. My concern is for people (particularly younger people) on one income or below the income level that makes it possible to acquire a home. Even at \$80,000 to \$100,000 / year, the time required to save enough for a down payment could be many, many years. We are in an affordability crisis and I believe we have left an entire generation stuck paying outrageous rents in HRM, with no hope or ever buying a home.

So, to clarify, who is determining what is “affordable” with all this planned construction? And how is this being managed? Will we consider alternatives such as co-op housing? Much smaller homes (maybe tiny homes as starters?). Etc.

Many thanks.
[name redacted]

Hello [redacted],

Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We’ve recorded your comments, and they will be anonymized and used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process. If you wish to submit additional comments or withdraw your submission, please let us know by Feb 24.

The HRM Charter defines ‘affordable housing’ as “housing that meets the needs of a variety of households in the low to moderate income range,” and the Canada Mortgage and Housing Corporation (CMHC) defines ‘core housing need’ as households who cannot access housing that meets standards for adequacy (housing condition), suitability (enough space), and affordability (less than 30% of before-tax income). The draft Regional Plan refers to both of these terms. You may also be interested in reading the draft regional plan chapter on housing.

In terms of the municipal role in supporting the development of affordable housing, there are a few initiatives to share:

- There are currently density bonusing regulations, which allow the municipality to require developments to provide public benefits or cash-in-lieu in exchange for additional development rights or relaxing certain requirements. The intent of this tool is to supplement other municipal investments so that new density is accompanied by the amenities and public benefits (including contributions to affordable housing) that can contribute to complete and inclusive communities. The density bonusing fees help support our affordable housing grant program.

	<ul style="list-style-type: none"> • Many municipal-related construction fees for residential development by registered non-profits or charitable housing organizations have been waived since 2020. • Staff are continuing to work on inclusionary zoning for the upcoming year and are expecting a study to conclude that will provide more data on inclusionary zoning from a financial perspective. Inclusionary zoning is a tool that allows affordable units to be required within new developments. • I'll also mention that we can only zone for land use, not ownership type, so co-ops are zoned in the same way as same as single-owner buildings. Tiny homes are also permitted across the municipality – the land use bylaws do not have a minimum dwelling size. • Additional information about past and ongoing initiatives for affordable housing is available on this website: https://www.halifax.ca/about-halifax/regional-community-planning/affordable-housing <p>Please let me know if you have any additional questions.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR45	<p>Regional Plan Team:</p> <p>The Minimum Planning Regulations includes this clause: (g) not impose maximum height restrictions in a manner that negatively affects the density of residential buildings using mass timber or any other construction method; You are proposing that the clause be implemented as follows: Include policy intent in the Regional Plan and adjust land use by-laws to convert height from metres and feet to storeys for medium and high density residential buildings.</p> <p>In the relevant Fact Sheet, you plan to make the following changes to Land Use By-laws for Bedford, Mainland Halifax, Dartmouth and other plan areas :</p> <ul style="list-style-type: none"> • Apartment buildings will now have their maximum heights measured in total storeys instead of in feet or metres. This will allow for more flexibility in construction methods such as the timber-framed buildings. • The definition of height in the land use by-law will reflect the height conversion to storeys. <p>Will 'Apartment Buildings' include Apartment containing 3 or 4 dwelling units within the Urban Service Area as amended into the by-laws as part of the Housing Accelerator Fund amendments? Let me know if you have any questions.</p> <p>Thanks, [name redacted]</p> <hr/> <p>Hello [redacted],</p> <p>The changes for reg (g) would apply to buildings with 5+ units.</p>

	<p>Kind regards, Telina</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p> <hr/> <p>Telina: Thanks for the prompt reply, which I'm not surprised at. Acknowledging that your response is the current thinking of HRM officials, yet to be confirmed or adopted by HRM Council or the Province, how does that 5+ minimum square with the language of existing By-laws and what reason is there for a 4 unit building not to have the same height unit of measure as a 5 unit building? [redacted]</p> <hr/> <p>Hi [redacted],</p> <p>Our approach to meeting the requirement focused on medium and high-density residential zones where height is a main controlling factor for achieving density and where we see challenges due to differences in construction methods. For instance, these changes make mass timber more feasible as a construction method, as it tends to require more space per storey than steel or concrete. The change to by-laws will enable mid and high-density buildings in zones that envision higher densities to achieve their full allowed height in storeys regardless of the construction method.</p> <p>Buildings in low-density zones do not typically encounter the same challenges in achieving density due to height differences in construction methods, and the main controlling factors for achieving density are other land use regulations such as lot coverage, setbacks, access, etc.</p> <p>I hope that this provides some more insight into our approach. We're happy to include any feedback you have on this in the report to Regional Council this spring.</p> <p>All the best, Telina</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR46	<p>Hello,</p> <p>I have been reading the 12 Minimum Planning Requirements. I have questions before offering feedback:</p> <p>Of the 12 Requirements, it would seem that all but e) Regional Municipal Planning Strategy (Regional Plan) for the suburban area are put into by-law/legislation or</p>

wherever they fall under and public feedback will not/cannot change it. Can you confirm this?

Regarding e) it is a lot to take in and perhaps the best way for me to understand is for you to tell me what changes are possible on my street now. And, what changes will be implemented in the Spring as per the following in the fact sheet:

“What will this change mean for me?

- The municipality will be undertaking a comprehensive planning process for the Suburban area (areas outside of the Regional Centre, where municipal water, wastewater, and transit services are available). Stay tuned for future planning engagement opportunities.”

I am on Summer Field Way in Portland Hills, Dartmouth. Present zoning is CDD. My single family small 2 bedroom bungalow is on a 5150sqft lot. Neighbours on my side of the street have similar size lots. So, at the moment or after the plan is finalized in The Spring as above will owners be permitted to:

- 1) put in a backyard suite or shipping container suite in the backyard? Same question if you are on the other side of the street where lots are 11,000sqft +?
- 2) demolish your existing single family home and build a 4 unit investment/rental property?
- 3) for the scenarios above, will there be zero requirement to provide parking for the increased density?

Can you please confirm that these 3 changes I anticipate on my street are in fact already in place in the Centre Plan in previous R1 zoned neighbourhoods like Crichton Park?

I look forward to a speedy and clear reply,
[name redacted]

Hello [redacted],

Thanks for your email and questions. The municipality is required to comply with the provincial legislation, but as part of the 30-day public engagement period we welcome any questions or comments and will bring them forward in a report to Regional Council.

For requirement (e), the only change we are making at this point is adding language to the Regional Plan that states the intent to do the Suburban Plan – the actual suburban plan is not being released this spring. Staff are working with the Province on how to address the Suburban Planning deadline and will be bringing a report on the Suburban Plan work plan to Regional Council this Spring. More information will be available then, and if you wish to receive an email update when that work plan is released, please email suburbanplan@halifax.ca.

	<p>I will also note that some of the items you've mentioned are impacted by the Minimum Planning Requirements:</p> <ul style="list-style-type: none"> • Requirement (L) requires that modular units and converted shipping containers be permitted as residential dwellings across HRM. Municipal land use by-law regulations for dwellings and secondary/backyard suites will still apply. For instance, while a converted shipping container will be eligible for use as a backyard suite, it is still subject to existing regulations for backyard suites like setbacks or lot coverage. Many areas of HRM permit backyard suites – click here to learn more. • Requirement (I) requires that residential buildings that are within the Urban Service Area (area serviced with municipal water and sewer) not be required to provide parking. Developers and owners of residential buildings may still voluntarily choose to provide parking spots, but the municipality's by-laws can no longer require a specific number of parking spots. <p>Since both of those requirements are part of the provincial legislation, all the municipality's existing and upcoming plans (like the suburban plan) will need to comply with them.</p> <p>If you have any additional questions or comments about the minimum planning requirements please let me know. You are also welcome to contact suburbanplan@halifax.ca for more information on that project.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR47*	<p><i>*Includes attachment.</i></p> <hr/> <p><i>[Letter text copied below]:</i></p> <p>February 5, 2025 Halifax Regional Municipality Council Halifax City Hall 1841 Argyle Street Halifax, NS B3J 3A5</p> <p>Dear Mayor Fillmore and Members of Regional Council:</p> <p>We are writing to seek your support in advocating to the Provincial Government to rescind the recent amendment to the Municipal Charter Minimum Planning Requirements Regulations that will significantly reduce the percentage of ground-floor commercial space required in residential buildings. As you know, the vitality of our downtowns and main streets is integral to the character and success of our communities, and this change could undermine our efforts.</p>

With a growing population, increasing densification, and reductions in available parking, it is essential to continue providing walkable amenities that serve the needs of our communities. Ground-floor commercial space is vital in sustaining small businesses that drive neighborhood growth and create a sense of place for residents and visitors alike. Reducing the percentage of commercial space in new developments would not only limit access to essential services but also directly impact our ability to fund critical programs that help our downtowns and mainstreets thrive. While the goal for all is to lessen our dependence on cars, this amendment will force residents to travel for goods and services.

The 9 Business Improvement Districts (BID) of Halifax Regional Municipality are currently working to support over 3,300 local businesses, which together account for approximately 23% of HRM’s total commercial assessment—valued at \$10,556,646,400. Through private funding of \$4,005,281, BIDs are able to deliver essential services such as marketing, advocacy, placemaking, and events. These services are crucial not only for helping businesses survive and grow but also for enhancing the overall quality of life in Halifax and contributing to the local economy.

By reducing the required amount of commercial space at ground levels, we risk making it more difficult for small businesses to establish themselves and thrive in areas where they are most needed. Furthermore, it limits the funding available for the programs and initiatives that create lively, well-maintained, and attractive downtown areas—places that everyone in the community can enjoy.

We respectfully urge you to take a stand and advocate on behalf of the residents, small businesses, and community organizations that rely on a mixed-use urban environment. By pushing the Provincial Government to reconsider this amendment, you can help ensure that Halifax’s downtowns and main streets remain welcoming for everyone.

Thank you for your attention to this matter. We look forward to your support.

Submitted by the Business Improvement Districts of:
Downtown Dartmouth
Downtown Halifax
North End Halifax
Porters Lake
Quinpool Road Mainstreet
Sackville
Spring Garden Area
Spryfield
Village on Main

MPR48*

****Includes 2 Attachments.***

Good evening all,

It is a snowy, cold and windy night. Currently minus 7 with a windchill of minus 14. Every time I let my two dogs outside , I stand near the door to let them in right away so as to not allow them to become cold.....then the guilt sets in knowing people are in tents. My dogs are getting better care than our own citizens.

Some serious concerns have been raised regarding the CBC article which covered the eviction of a veteran from his Motor home in Wellington NS. This is just one of thousands of people desperate to stay warm, well and productive. Allowing people to remain in their affordable "home" takes the horrendous strain off of shelters, health care and community services.

It is clear there is much good work being done by government, non profit and business sectors in response to the housing crisis. I am grateful, however, It is not enough and it is not timely and it is unacceptable.

I have taken some time to review the regional plan, research some historical data and stay informed on the housing and shelter needs in my rural area of HRM, the province and also North America.

A few points that I have added in the attachments, help to fortify the changes needed now. We do not have more time. Our citizens are facing absolute cruel circumstances, most of which can be alleviated by simple changes to our bylaws.

I request that recreational vehicles be included in the bylaws to allow for residential use. Now.

I request that tiny homes be included in the bylaws to allow for residential use. Now.

Respectfully,
[name redacted]

Hello [redacted],

Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be anonymized and used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process. If you wish to submit additional comments or withdraw your submission, please let us know by Feb 24.

Requirement (L) of the Minimum Planning Requirements requires that manufactured housing, including modified shipping containers, be permitted in all residential zones. However, this requirement is not changing the regulations for recreational vehicles. There is a staff report on this topic headed to Regional Council in the coming months. I can pass your comments along to staff working on that report. I've also copied the Regional Council motion below:

THAT Halifax Regional Council direct the Chief Administrative Officer (CAO) to provide a staff report considering land use zoning changes to allow the use of Recreational

	<p>Vehicles (RV's) for residential use. This report should include and consider: 1. Temporary accommodations for construction, seasonal rentals, backyard suites and emergency sheltering. 2. Compatibility within Urban, suburban and rural areas. 3. Best practices from other jurisdictions where RV's are utilized for residential use.</p> <p>I'll also add that as part of Phase 3 of the Regional Plan review in 2022, any remaining barriers to tiny homes in land use bylaws were removed. Tiny homes are currently permitted anywhere a larger residential dwelling is permitted, and subject to the same requirements. Tiny homes can also be used as backyard suites, subject to meeting zone requirements for backyard suites.</p> <p>Thank you again for your email, and if you have any additional comments or questions on the Minimum Planning Requirements or Regional Plan Review please reach out anytime. I've added you to our mailing list, per your request.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR49	<p>Hi! Would you please let me know what the status of this matter is and how I may keep informed of any progress and make a submission to Council?</p> <p>Thank you for your help!</p> <hr/> <p>[Phone Call]</p> <p><i>Staff summary:</i> Resident represents a group of concerned people who will be submitting a formal letter before the engagement period closes on Feb 24.</p>
MPR50	<p>Hello,</p> <p>I'd like to give feedback on the Minimum Planning Changes. While the need for housing is great, I didn't see the documents address the infrastructure needed within the municipality in order to accommodate our growing numbers, such as schools and roads.</p> <p>For example, our roads are already quite congested, and only getting worse with growing numbers of people, return to office mandates, and traffic calming measures/transit prioritization. Removing parking space requirements would certainly encourage people to do without a vehicle, but sometimes that's not possible. Where will residents park? Is the city going to fast-track or prioritize building municipal lots? New or wider roads?</p> <p>Housing is one aspect of a complex issue. It's great to see changes to remove barriers, but there are other aspects that will need to be addressed too, so that the</p>

people who move to our wonderful city have the resources that they need. How will these secondary services (roads, schools, grocery stores, transit, etc.) be brought up to speed?

Thanks for your consideration.

Best wishes,
[name redacted]

Hello [redacted],

Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be anonymized and used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.

I can provide some more context and information to respond to your questions. The Minimum Planning Requirements are legislation introduced by the provincial government in August 2024 and require the municipality to update land use plans and strategies. The province's stated intent with these requirements is to increase housing supply in the municipality. The requirements do not address what future improvements are needed to support infrastructure and services.

However, there is ongoing municipal work that will look at this issue. As a separate project from the Minimum Planning Requirements, the municipality is in a phased review of the Regional Plan, which is an HRM plan that sets out a common vision, principles, and long-range, region-wide planning policies outlining where, when and how future growth and development should take place. Staff have identified that the upcoming Phase 5 will involve the creation of a Strategic Growth and Infrastructure Priorities Plan. This plan will identify needs and future investments in infrastructure, transportation, and consider community assets like recreation facilities and libraries, etc.

I'll also mention that the Joint Regional Transportation Agency (JRTA) is a provincial Crown corporation tasked with developing a long-term transportation plan for Halifax and the surrounding area (within a one-hour driving distance). They are expected to release a Regional Transportation Plan in the future. The outcomes of that Plan will also inform HRM planning's work. In terms of other services, while some services are fully within HRM's jurisdiction, the province has authority over the development of schools. HRM shares information such as population projections with the Halifax Regional Centre for Education, Conseil scolaire acadien, and the Province to help inform their decisions around locating schools and other public facilities.

I hope that this is helpful. If you have any other comments or questions about the minimum planning requirements, please let us know. If you're interested in following updates on Phase 5 of the Regional Plan, let me know and I can add you to our mailing list.

	<p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p> <hr/> <p>Thank you so much for the information, Telina.</p> <p>I really appreciate your thorough and thoughtful response.</p> <p>Best wishes, [name redacted]</p>
MPR51	<p>[Phone Call]</p> <p><i>Staff summary:</i> Interested in opportunities for internal conversion of existing commercial buildings to residential, particularly CGB Zone in Bedford LUB. Will send in formal comment by email.</p>
MPR52	<p>Good afternoon Councillor Steele,</p> <p>I'm a resident in your ward and want to share my thought re. the proposed development plan for 117 Kearney Lake Rd.</p> <p>I am thrilled to hear the proposal would build significant new housing in our area. We're in a prolonged housing crisis, and what we need most are more units.</p> <p>However, I would strongly advocate for the inclusion of retail or other mixed use space on the ground floor. As it stands, that plaza is home to an NSLC, Tim Hortons, Optometrist, School facility, grocery store, pizza shop, and more. It is some of the only retail that is available in walking distance from our house and something my wife, kids, and I make regular use of. I would advocate for the inclusion of ground-floor retail/business use at that site.</p> <p>Thank you Councillor and all the best, [name redacted]</p> <hr/> <p>Hi [redacted],</p> <p>Thank you for your email. I appreciate receiving your comments about the need for more housing and the importance of having a complete community where you can walk to access retail and services. I should note that, depending on when this project goes forward, it may be subject to the new minimum planning regulations that the Province of Nova Scotia will require of HRM effective after June 2025. These minimum planning regulations will reduce the ground floor commercial use requirements.</p>

	<p>The municipality is legally required to meet the Provincial requirements and is running a 30-day public engagement period which started January 24 and will run until February 24, 2025. Land use by-laws that currently require up to 100 percent of the ground floor of a building to be commercial uses will now only be required to provide 20 percent of the ground floor to be commercial. This new Provincial requirement is scheduled to be in effect until April 1, 2027.</p> <p>Here is the link to the consultation documents related to the minimum planning requirements:</p> <p>https://www.shapeyourcityhalifax.ca/minimum-planning</p> <hr/> <p>Hi HRM Regional Planning Team, I received the below email from [redacted], a resident of District 12. (Thanks to Councillor Morse who wisely suggested that I forward it to you.)I have included my reply to the resident below his incoming email.</p> <p>Thank you,</p> <p>Janet</p> <hr/> <p>Hello Councillor Steele,</p> <p>Thank you for sending this along. I'll also copy the Suburban Plan team for their records, as 117 Kearney Lake Rd is included in the Urgent Changes to Planning Documents for Housing Additional Suburban Sites Final Recommendations.</p> <p>Best, Telina</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR53	<p>To whom it may concern,</p> <p>Thank you for giving Halifax inhabitants the opportunity to share their views about how Halifax answers to the housing crisis.</p> <p>First, I would like to say that, I am very disappointed by the way Halifax is being developed : it is destroying Halifax Peninsula ,making it like any modern suburb of large North American cities: I don't really care for a copy of downtown Toronto where the sun and the sky are disappearing or Mississauga suburb style. When I moved to Halifax, we were able to see the sea from the Citadel... I have been living in many cities around the world and Halifax is a disaster in terms of development , architecture and transportation.(the development around the Communes could have</p>

make it an architectural landmark, same with the Richmond yard and no green space, building to close to each other , the rejection of a long term solution for the Windsor exchange...)

So here are my comments:

- Halifax peninsula historically was not designed to be a high rise city.
- lost of identity such as wanting to demolish the Alehouse on Brunswick st,
- the building height should be no more than 6 storeys high. Developers have too much say in the style of what they build, profit decides. Obviously, they do not live in what they build.
- there should be underground parking for every high rise building.
- the square footage of units should be livable: a bedroom should fit more than a bed. The noise pollution should also be considered.
- in each project, there should be a mixed of apartments size from bachelor to 3 bedrooms , townhomes and individual homes to induce a good population mix.
- the new subdivisions outside the peninsula are not walkable neighborhoods, you need 2 cars. The roads and infrastructures are not planned properly. Look at what happened with the fire in Sackville. It is a missed design opportunity .
- the idea of ground floor businesses is a good idea in principle but in reality people go to big stores to shop. The population is not dense enough to have too many of those places.
- Also since the infrastructure is not always available outside the peninsula, it is cheaper for developers to build on the Peninsula than in the suburbs, so they make more profit...
- there should be more green spaces.

I sincerely think the criteria to develop a city should include not only housing needs but also an architectural plan which would be an asset to attract visitors and enhance the inhabitants quality of life by preserving and creating history and character.(ex: the Hydrostones neighborhood)

So I am sorry about not supporting the face of the new Halifax, but I thank the people whose it is their job to develop the city. It is not easy , and also not easy to please everyone.

Regards

[name redacted]

Hello [redacted],

Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be anonymized and used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.

If you wish to submit additional comments or withdraw your submission, please let us know by Feb 24.

	<p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR54	<p>Hello,</p> <p>As a young professional in Halifax looking to get into the housing market, I am all for accelerating housing development. However, I hope that transit and interconnected communities are being considered along with these proposed changes. Increasing density and eliminating parking requirements are great first steps, but mean those housing developments need to have fast, frequent, and connected urban transit options nearby; and/or the associated utilities and services people need within a few minutes walk. Considering where grocery stores, medical facilities, offices, and other services are located in relation to these new housing options is critical for reducing traffic congestion and pollution within HRM. I hope this is also being planned for when these changes are happening!</p> <p>Thank you [redacted]</p> <hr/> <p>Hello [redacted],</p> <p>Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be anonymized and used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.</p> <p>I'll also add that as a separate project from the Minimum Planning Requirements, the municipality is in a phased review of the Regional Plan. The Regional Plan is an HRM plan that sets out a common vision, principles, and long-range, region-wide planning policies outlining where, when and how future growth and development should take place. Staff have identified that the upcoming Phase 5 will involve the creation of a Strategic Growth and Infrastructure Priorities Plan. This plan will identify needs and future investments in infrastructure, transportation, and consider community assets like recreation facilities and libraries, etc.</p> <p>The upcoming Suburban Plan may also be of interest - that project will update zoning and community plans for the suburban area (areas outside of the regional centre and serviced with water and sewer). Building complete communities with good access to amenities and services is certainly part of that work. If you're interested in learning more please email suburbanplan@halifax.ca to be added to their mailing list for updates.</p>

	<p>If you have any other comments or questions about the minimum planning requirements, please let us know. If you're interested in following updates on Phase 5 of the Regional Plan, let me know and I can add you to our mailing list. The regional planning website is linked here: https://www.shapeyourcityhalifax.ca/regional-plan.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR55	<p>I think it's imperative that HRM and the province consider adding a school on the Halifax peninsula maybe by the Seaton lands that are being developed. I also think with all the new development going up we need to ensure that the bottom floor has business areas for daycare for community centres for stores so that people can easily access necessities without driving.</p> <p>[name redacted]</p> <hr/> <p>Hello [redacted],</p> <p>Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be anonymized and used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.</p> <p>I can provide some more information that may be of interest to you. The Minimum Planning Requirements are legislation introduced by the provincial government in August 2024 and require the municipality to update land use plans and strategies. The province's stated intent with these requirements is to increase housing supply in the municipality. The requirements do not address what future improvements are needed to support infrastructure and services.</p> <p>However, there is ongoing municipal work that will look at this issue. As a separate project from the Minimum Planning Requirements, the municipality is in a phased review of the Regional Plan, which is an HRM plan that sets out a common vision, principles, and long-range, region-wide planning policies outlining where, when and how future growth and development should take place. Staff have identified that the upcoming Phase 5 will involve the creation of a Strategic Growth and Infrastructure Priorities Plan. This plan will identify needs and future investments in infrastructure, transportation, and consider community assets like recreation facilities and libraries, etc.</p> <p>While some services are fully within HRM's jurisdiction, the province has authority over the development of schools. HRM shares information such as population projections with the Halifax Regional Centre for Education, Conseil scolaire acadien,</p>

	<p>and the Province to help inform their decisions around locating schools and other public facilities.</p> <p>The upcoming Suburban Plan may also be of interest - that project will update zoning and community plans for the suburban area (areas outside of the regional centre and serviced with water and sewer). Trying to create complete communities with good access to commercial areas and amenities is certainly part of that work. If you're interested in learning more about that project, please email suburbanplan@halifax.ca to be added to their mailing list for updates.</p> <p>I hope that this is helpful. If you have any other comments or questions about the minimum planning requirements, please let us know.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR56	<p>[phone call] <i>Staff Summary:</i> phone call re: unit mix. Resident had questions about how unit mix reg would be applied and how it is different than a cap on bedrooms.</p>
MPR57	<p>[phone call] <i>Staff Summary:</i></p> <ul style="list-style-type: none"> - Concern about the proposal at 1226 Cole Harbour Rd (Special Planning Area). Doesn't think 12 storeys is appropriate for the community. - Discussed the planning process and differences of site plan approval vs. regular as-of-right or discretionary planning applications. - Concern about the number of applications happening in his community (Cole Harbour), particularly along Portland Street. How will Portland Street and Main Street (Hwy 7) handle 10,000+ units? <ul style="list-style-type: none"> o Discussed various infrastructure studies happening – IRP, Suburban Plan, Regional Plan (Phase 5), and Strategic Growth and Transportation Planning team. - Question related to MPR (g) – what did it mean and is HRM addressing it in the proposed amendments? <ul style="list-style-type: none"> o Clarified interpretation and how our approach will meet the requirement. - Question related to MPR (b) – how do we prioritize housing above all else? <ul style="list-style-type: none"> o Clarified our approach through Regional Plan policy language, but also that the Regional Plan is meant to be read and interpreted in its entirety so that infrastructure, environment, transportation, etc. are also all accounted for in our decision making processes.
MPR58	<p>With respect to: (i) provide that no requirement for on-site parking applies to residential uses within the urban service area;</p>

	<p>Given that EVs are to be the future for PMVs, on-site parking should be a mandatory requirement so that charging can be done in a safe manner without running charging cables out to the curb.</p> <p>Best Regards</p> <hr/> <p>Hello [redacted],</p> <p>Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be anonymized and used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.</p> <p>All the best, TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR59	<p>I am writing to express my opposition to the so-called Minimum Planning Changes, and to call for a genuine period of public engagement.</p> <p>While I support responsible approaches to densification in the interests of alleviating the current housing shortage, the changes as they now stand are crude and destructive.</p> <p>Moreover, the window for public engagement that expires today is a fraud. The relevant document at Minimum Planning changes in Halifax Shape Your City Halifax explicitly identifies the changes as a fait accompli, and defines the purpose of public engagement as being to "notify" city residents of what is taking place so that they can "learn about" what is being imposed on them. This is no way to treat citizens of the city and of the province.</p> <p>I look for immediate reconsideration of this arbitrary process.</p> <hr/> <p>Hello,</p> <p>Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be anonymized and used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.</p> <p>All the best, TELINA DEBLY MCIP, LPP</p>

	<p>PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
<p>MPR60</p>	<p>February 20, 2025 Dear City, Planning Department, Mayor;</p> <p>We all recognize that our city is in dire need of affordable housing. But the unruly approach to densification we're now witnessing is concerning and has had a negative impact on</p> <ul style="list-style-type: none"> - city services - traffic - parking - heritage preservation - and green space <p>What's frustrating is that the new zoning bylaws do little to ensure increased levels of affordable housing. City streetscapes are being razed to build apartment towers with rents well over what you would call affordable. Even smaller scale developments like four or eight unit buildings are being proposed to be built right in middle of established single family home neighbourhoods. These go well beyond building a "granny flat" in the backyard.</p> <p>What's worse in our particular case, is the CAO may have the power to eliminate approximately 85 year old restrictive covenants restricting development that are common among a subdivision of eight lots in favour of one lot whose owner wants to sell and get the maximum possible price given the new zoning but doesn't even live in the City anymore!</p> <p>The changes these bylaws allow will be irreversible. Before our city is damaged beyond repair, we ask that you put in place specific risk-management strategies to:</p> <ul style="list-style-type: none"> - mitigate potential harms arising from developments; - encourage more consultation with existing communities before developments are approved; - address infrastructure pressures; - ensure public safety with updated evacuation routes <p>There's rising dissatisfaction throughout the city because people feel their voices aren't being heard. Their communities are being radically altered without their input.</p> <p>We understand our new mayor and many councillors have expressed nervousness about unfettered growth. Further, Council has asked the Province for legal protection from potential citizen claims of "constructive taking and de facto expropriation of private property" by allowing such rapid and unchecked development in HRM as a result of the Provincial Regulations.</p> <p>That's why we're asking that zoning bylaws mandate a three-month period of active community engagement and involvement before the approval of any development project.</p>

	<p>Thanks, [redacted]</p> <hr/> <p>Hello [redacted],</p> <p>Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We’ve recorded your comments, and they will be anonymized and used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.</p> <p>For some additional context, in August 2024, the province announced 12 new minimum planning requirements regulations. The municipality is legally required to update land use bylaws and plans to meet these requirements. While the minimum planning requirements affect some specific regulations, they do not change the permitted uses (types of dwellings) or density (number of units) set out in your land use by-law zone. The zoning changes identified in your email were previously made as part of the Urgent Changes to Planning Documents for Housing and were engaged on and adopted by Regional Council in May 2024.</p> <p>The zoning changes identified in your email were previously made as part of the Urgent Changes to Planning Documents for Housing and were engaged on and adopted by Regional Council in May 2024.</p> <p>All the best, TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR61	<p>Hello Mayor Fillmore, Premier Houston, Councillor White and members of the HRM planning staff —</p> <p>I’m writing in strong opposition to the new HRM zoning bylaws that have been pushed through without adequate public consultation.</p> <p>We all recognize that Halifax has a housing shortage. We want and need development — but it has to be safe, sustainable, affordable and respectful of existing communities. The reckless blanket rezoning of almost all of Halifax is already jeopardizing our overburdened infrastructure, our urban forest, our historic streetscapes and our neighbourhoods.</p> <p>There are currently 12,000 vacant lots in HRM. Why are more buildings being taken down? Why have these not been prioritized for development?</p> <p>Many of us came to Halifax — or, in my case, returned home — because of the lifestyle it offered. We chose to live and work in a beautiful, historic city with family-centred neighbourhoods, walkable streets and east coast charm. Many of us also</p>

	<p>spent countless hours over the years at meetings to develop the Central Plan. All that work was apparently for naught.</p> <p>Before Halifax is destroyed beyond recognition, I'm asking that zoning bylaws mandate a three-month period of active community engagement before the approval of any development project.</p> <p>Sincerely, [redacted]</p> <hr/> <p>Hello [redacted],</p> <p>Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be anonymized and used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.</p> <p>For some additional context, in August 2024, the province announced 12 new minimum planning requirements regulations. The municipality is legally required to update land use bylaws and plans to meet these requirements. While the minimum planning requirements affect some specific regulations, they do not change the permitted uses (types of dwellings) or density (number of units) set out in your land use by-law zone.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR62	<p>Dear Halifax Regional Planning Committee,</p> <p>The Liveable Halifax Coalition is an alliance of communities and citizens who actively support smart development and densification in HRM. We all recognize that our city is in dire need of affordable housing.</p> <p>But the unruly approach to densification we're now witnessing is concerning. Basic checks and balances, to ensure the quality of our urban environment, have been erased from planning reviews. And no wonder.</p> <p>The breakneck speed of development has already had a negative impact on</p> <ul style="list-style-type: none"> - city services - traffic - parking - heritage preservation - and green space

What's worse is that the new zoning bylaws do little to ensure increased levels of affordable housing. City streetscapes are being razed to build apartment towers with rents well over \$2000/month. Relying on a 'trickle-down effect' is not a well-grounded planning strategy to ensure that people have the homes they need at a price they can afford.

The changes these bylaws allow will be irreversible. Before our city is damaged beyond repair, we ask that you put in place specific risk-management strategies to

- mitigate potential harms arising from developments;
- mandate real consultation with existing communities before developments are approved;
- address infrastructure pressures;
- ensure public safety with updated evacuation routes; and
- align projects with current strategies such as the Integrated Mobility Plan and the Environmental Protection Plan.

There's rising dissatisfaction throughout the city because people's voices aren't being heard. Their communities are being radically altered without their input.

We understand our new mayor and many councillors have expressed nervousness about unfettered growth. Further, Council has asked the Province for legal protection from potential citizen claims of "constructive taking and de facto expropriation of private property" by allowing such rapid and unchecked development in HRM as a result of the Provincial Regulations.

That's why we're asking that zoning bylaws mandate a three-month period of active community engagement and involvement before the approval of any development project. We also ask Council to withdraw this request for legal protection by the Province.

Yours Sincerely,
[redacted]

Hello [redacted]

Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be anonymized and used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.

For some additional context, [in August 2024, the province announced 12 new minimum planning requirements regulations](#). The municipality is legally required to update land use bylaws and plans to meet these requirements. While the minimum planning requirements affect [some specific regulations](#), they do not change the permitted uses (types of dwellings) or density (number of units) set out in your land use by-law zone.

	<p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR63	<p>Hello:</p> <p>In my opinion many of the 12 adjustments the Provincial Government insists HRM include within its planning process are extremely short sighted and will have long term, unintended consequences which those who live and work within the HRM will have to deal with.</p> <p>I understand that there is a need for housing, and that having affordable housing is critical. Nothing within these 12 adjustments appears to focus on the affordability part.....</p> <p>I was always under the impression that HRM took planning seriously. I thought that our municipality and provincial government took pride in creating a well, planned city and rural/suburban area. These changes threaten all of the good work that has gone on before.</p> <p>If all of these items are allowed to proceed, we will end up with a municipality with areas of total inconsistency. Existing neighbourhoods may be negatively impacted by developers snatching up the odd parcel of land and creating housing that does not fit the existing requirements. Can you imagine a converted shipping container being placed in a South End neighbourhood? Doubtful...Why then should these types of homes be allowed in any other neighbourhood, unless there is a specific new neighbourhood (like a mini home park) created? I can only imagine the outcry, unless there are rules around how these "homes" must look.</p> <p>In my opinion, these changes have been created simply to allow developers a "wild west" atmosphere for building. If the province really wanted to help with the housing shortage, they would engage with those organizations which already deal with "affordable housing" such as Dartmouth Non-Profit Housing etc.</p> <ul style="list-style-type: none"> • These new rules will allow some of the less scrupulous developers (and we do have those) to run a-muck in our city using the cheapest materials, design etc., instead of building quality apartment buildings and homes. • Ignoring previous zoning requirements, regard for exterior cladding, height requirements and future developments will negatively affect the areas where these buildings are being constructed. • Eliminating the need for on-sight parking and story height is ridiculous! Can you imagine the congestion of the streets where these new high-rises are being built coupled with the ability to construct without parking? Where will these vehicles go? Not everyone who lives in these buildings are cyclists.

	<ul style="list-style-type: none"> • What about the lack of other infrastructure such as existing schools? - HRM has gone from an era of shuttering schools to bringing back the "portable" classrooms we had in the 70's and 80's. Has the province thought about this? <p>In conclusion, great cities are well thought, planned out spaces. They take into consideration the living, working, recreational, educational, health and transit/infrastructure needs of the people who live there. These changes DO NOT conform to how HRM should be proceeding with its' future developments.</p> <p>Given the other new bills being introduced by the PC Government lately I firmly believe that Tim Houston, and The Province of Nova Scotia need to STAY IN THEIR LANE!</p> <p>Sincerely, [redacted]</p> <hr/> <p>Hello [redacted],</p> <p>Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR64	<p>I will not rant as I know you have a lot of mails.</p> <p>First off I'm 80 and was a small developer from 1960s till my last project. I have traveled in third world countries. With no rules just too many people. Like HRM is becoming. To the point.</p> <p>Back yard no parking , no real restrictions other then size , built by anyone mini homes is a bad idea trust me on this. Where do the cars park , this is not a climate for street parking, and the, they will bike to work in our winters, who came up with that idea. Bike lanes will help with traffic another pipe dream. I'm a biker yes at 80 also snowboarder , kite boarder and wing foiler . Love bike lanes , but they do noting to help traffic ,in fact , they slow down on my return home.</p> <p>City planing should be planning , not bowing down to big developers with gov drag. Like for example , the people of Dartmouth should not be treated different them people of Halifax. Halifax NW arm a no in fill by law. But Dartmouth cove , none. Why ,a big developer can make a ton of money destroying it and has Tim H on his side. This</p>

	<p>forget the wishers of the people soon as you get a foot hold on power, as long as we can make money for developer friends has to stop.</p> <p>I could add more but you get my drift I'm sure.</p> <p>[redacted]</p> <p>Dartmouth cove .</p> <p>Well maybe Dartmouth dump if Tim and Atlantic paving get their way. Dartmouth cove needs someone in council to stand up for the people, and stop the filling of some people's pockets with money over what right and best for our oceans.</p> <hr/> <p>Hello [redacted],</p> <p>Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be anonymized and used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.</p> <p>While not part of the Minimum Planning Requirements changes, as a separate project, the Municipality is considering amending the Regional Centre Secondary Municipal Planning Strategy and the Regional Centre Land Use By-law to prohibit most water lot infilling activities in Dartmouth Cove. You can learn more and get in touch with staff working on that file at this link: https://www.halifax.ca/business/planning-development/applications/plproj-2024-01075-dartmouth-cove-dartmouth</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR65	<p>Dear Mayor Fillmore and Regional Planning staff,</p> <p>As a resident of Halifax, I understand the need for urgent initiatives to increase our housing supply, and in particular our affordable housing supply.</p> <p>The proposed Halifax zoning changes, however, need reconsideration in several important areas.</p> <p>Firstly, they fail to protect/provide urban green spaces and greenery, which are integral to the health and wellbeing of Haligonians. As you know, trees are one of the only municipal assets which generally increase in value over time. In many cities around the world, anyone requiring a mature tree to be destroyed — even one on private property — must pay a significant fee in order to do so. Proceeds from these</p>

fees can be used towards re-greening the vicinity in other ways or subsequent to construction. Such a system would internalize the economic value of the natural assets to the project requiring their removal. This factor is absent from the rezoning proposal as it stands.

Further, more density demands more green areas. So developers need to be incentivized/required to incorporate green space in accordance with the number of units their projects are adding.

Secondly, Halifax's irreplaceable heritage should be preserved as much as is possible. Even trees re-grow over a number of decades. But historically significant buildings can never be regained once they are demolished. Our history is a significant part of our identity, and it shouldn't be wiped out in any kind of rush.

Thirdly, significant safety and liability issues need to be properly thought out. Emergency evacuation plans need to be feasible, not just for the peninsula as a whole, but also for individual areas.

Here on Belmont on the Arm, for instance, the only means of ingress/egress is a single lane bridge. Fortunately, at the moment, the traffic flow is light enough that has not yet been a bottleneck, although it has come close on a few occasions when there has been a lot of construction on the street. (On at least one recent occasion I understand that municipal services have not been able to gain access due to congestion.)

Additionally, unlike most areas on the peninsula, there are absolutely no sidewalks, not even on one side of the street. This is already hazardous for any pedestrians walking here and poses an enhanced risk for the many children on the street and their visiting friends.

If the density here doubled, these risks would be significantly higher. If it tripled, or quadrupled, there could be tragic consequences to both pedestrians and also folks needing emergency medical or firefighting assistance in the case of a blocked bridge.

This street is at least one area in Halifax whose infrastructure cannot safely accommodate the proposed increase in density. The municipality could face liability exposure if this is not adequately addressed before adjusting the zoning here.

Kindly advise how you plan to address liability and other issues as outlined above.

With my best regards,
[redacted]

Hello [redacted],

Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be anonymized and used to inform a report to Regional Council this spring.

	<p>There will be an additional opportunity for public comment at that time as part of the public hearing process.</p> <p>For some additional context, in August 2024, the province announced 12 new minimum planning requirements regulations. The municipality is legally required to update land use bylaws and plans to meet these requirements. While the minimum planning requirements affect some specific regulations, they do not change the permitted uses (types of dwellings) or density (number of units) set out in your land use by-law zone. A summary of the proposed changes to comply with the Minimum Planning Requirements can be found here: https://www.shapeyourcityhalifax.ca/minimum-planning/news_feed/minimum-planning-requirements-summary</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR66	<p>To whom it may concern,</p> <p>My name is [redacted]. I'm writing you about the consultation period surrounding the ER-3 zoning changes.</p> <p>A few years ago I worked in pre-development in Halifax. I was leading a community engagement initiative in the Gottingen community for the Victoria Hall DA. We were proposing various scenarios of affordable housing units relative to building height.</p> <p>Having worked previously as a developer, and as a young person who cares about the affordability crisis, I'm generally pro-development.</p> <p>Also, the more I have travelled the world, the more Halifax stands out as a treasured jewel. There is nowhere else on the planet that feels like Halifax.</p> <p>Change is part of life, and sometimes change is painful. My only hope is that as you steward the change that is needed at this time, that you and your team bring a deep level of presence and thoughtfulness in considering the layers of impacts around whichever direction you choose. If we get more units, but we lose what makes Halifax Halifax, that would feel like something sacred being lost.</p> <p>Thanks, [redacted]</p> <hr/> <p>Hello [redacted],</p> <p>Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and</p>

	<p>they will be anonymized and used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.</p> <p>For some additional context, <u>in August 2024, the province announced 12 new minimum planning requirements regulations</u>. The municipality is legally required to update land use bylaws and plans to meet these requirements. While the minimum planning requirements affect <u>some specific regulations</u>, they do not change the permitted uses (types of dwellings) or density (number of units) set out in the land use by-law zones. The ER-3 zoning changes identified in your email were previously made as part of the <u>Urgent Changes to Planning Documents for Housing</u> and were engaged on and adopted by Regional Council in May 2024.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR67	<p>Hello HRM, I'm a resident on Victoria Road in Halifax, and have just found out this past week through a neighbour that our neighborhood is being considered for rezoning to R3.</p> <p>I was not aware of this development, and therefore not have had an opportunity to participant in any public consultations. I therefore request that the deadline for feedback be extended, along with a more robust communications package from HRM that is made available to all residents potentially impacted, alongside a concerted effort to raise awareness of the opportunity to provide feedback.</p> <p>Regards, [redacted]</p> <hr/> <p>Hello [redacted],</p> <p>Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be anonymized and used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.</p> <p>For some additional context, <u>in August 2024, the province announced 12 new minimum planning requirements regulations</u>. The municipality is legally required to update land use bylaws and plans to meet these requirements. While the minimum planning requirements affect <u>some specific regulations</u>, they do not change the permitted uses (types of dwellings) or density (number of units) set out in the land use by-law zones. The ER-3 zoning changes identified in your email were previously made</p>

	<p>as part of the <i>Urgent Changes to Planning Documents for Housing</i> and were engaged on and adopted by Regional Council in May 2024.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR68	<p>Dear HRM planners;</p> <p>I am writing to formally express my concerns regarding the recent trend of multi-unit residential developments being approved in areas that have traditionally been designated for single-family homes.</p> <p>As a resident of the neighborhood around Le Marchant School, I strongly believe that these projects are not in line with the character and intent of our community, and I urge you to reconsider allowing such developments in strictly residential areas.</p> <p>The introduction of high-density housing in established neighborhoods raises several concerns, including:</p> <ol style="list-style-type: none"> 1. Disruption of Neighborhood Character – Many residents chose to live in these areas because of the quiet, spacious, and family-friendly environment. Large, high-density buildings can disrupt the aesthetic and ambiance of the community, negatively affecting property values and overall livability. 2. Increased Traffic and Parking Issues – Single-family neighborhoods are not designed to accommodate the additional traffic and parking demands that multi-unit buildings bring. This leads to congestion, safety hazards, and difficulty for residents to park near their homes. 3. Strain on Infrastructure and Public Services – Water, sewage, roads, and emergency services are designed based on the expected density of single-family homes. A sudden increase in population due to multi-unit buildings could overwhelm these services, leading to decreased quality and higher costs for taxpayers. 4. Environmental Impact – The removal of green spaces and trees to accommodate large buildings contributes to increased heat, reduced air quality, and loss of natural habitats for local wildlife. <p>While I understand the need for diverse housing options, I believe that such developments should be strategically placed in areas that can support them without negatively impacting established neighborhoods.</p> <p>I urge you to enforce zoning regulations that protect residential communities from incompatible high-density construction and preserve the neighborhood character.</p> <p>I appreciate your time and consideration of this matter, and I look forward to your response. And I would appreciate the opportunity for public consultation or public meetings for residents to voice their concerns.</p>

	<p>Sincerely,</p> <p>[redacted]</p> <hr/> <p>Hello [redacted],</p> <p>Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be anonymized and used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.</p> <p>For some additional context, <u>in August 2024, the province announced 12 new minimum planning requirements regulations</u>. The municipality is legally required to update land use bylaws and plans to meet these requirements. While the minimum planning requirements affect <u>some specific regulations</u>, they do not change the permitted uses (types of dwellings) or density (number of units) set out in the land use by-law zones. The ER zoning changes identified in your email were previously made as part of the <i>Urgent Changes to Planning Documents for Housing</i> and were engaged on and adopted by Regional Council in May 2024.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR69	<p>On Connaught Ave ...and .norwood</p> <p>Attention mayorkindly read ...[redacted] Please connect with me having been o [redacted] street for 50 YEARS..plus Please help me ...Thank you</p> <p>Leave as residence NOT squeezing apartments on to one lot ..</p> <hr/> <p>Hello [redacted],</p> <p>Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be anonymized and used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.</p> <p>For some additional context, in August 2024, the province announced 12 new minimum planning requirements regulations. The municipality is legally required to update land use bylaws and plans to meet these requirements. While the minimum planning requirements affect some specific regulations, they do not change the permitted uses (types of dwellings) or density (number of units) set out in your land use by-law zone.</p>

	<p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR70	<p>February 22, 2025</p> <p>Ms. Jacqueline Hamilton Director HRM Planning and Development</p> <p>Attention Ms. Hamilton,</p> <p>I am writing to formally express my concerns regarding the recent trend of multi-unit residential developments being approved in areas that have traditionally been designated for single-family homes.</p> <p>As a resident of Halifax District 9(Woodlawn Terrace- lower end of Quinpool Road) I strongly believe that these projects are not in line with the character and intent of our community, and I urge members of the HRM Council as well as you to reconsider allowing such developments in strictly residential areas.</p> <p>The introduction of high-density housing in established neighborhoods raises several concerns, including:</p> <ol style="list-style-type: none"> 1. Increased Traffic and Parking Issues – Single-family neighborhoods are not designed to accommodate the additional traffic and parking demands that multi-unit buildings bring. This leads to congestion, safety hazards, and difficulty for current residents to park near their homes. 2. Strain on Infrastructure and Public Services – Water, sewage, roads, and emergency services are designed based on the expected density of single-family homes. A sudden increase in population due to multi-unit buildings could overwhelm these services, leading to decreased quality and higher costs for taxpayers. 3. Disruption of Neighborhood Character – Many residents chose to live in these areas because of the quiet, spacious, and family-friendly environment. Large, high-density buildings can disrupt the aesthetic and ambiance of the community, negatively affecting property values and overall livability. 4. Environmental Impact – The removal of green spaces and trees to accommodate large buildings contributes to increased heat, reduced air quality, and loss of natural habitats for local wildlife. <p>While I understand the need for diverse housing options, I believe that such developments should be strategically placed in areas that can support them without negatively impacting established neighborhoods.</p> <p>I urge you to enforce zoning regulations that protect residential communities from incompatible high-density construction.</p>

	<p>I appreciate your time and consideration of this matter, and I look forward to your response. Please let me know if there are any public meetings or opportunities for residents to voice their concerns.</p> <p>Sincerely, [redacted]</p> <hr/> <p>Hello [redacted],</p> <p>Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be anonymized and used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.</p> <p>For some additional context, <u>in August 2024, the province announced 12 new minimum planning requirements regulations</u>. The municipality is legally required to update land use bylaws and plans to meet these requirements. While the minimum planning requirements affect <u>some specific regulations</u>, they do not change the permitted uses (types of dwellings) or density (number of units) set out in the land use by-law zones. The ER-3 zoning changes identified in your email were previously made as part of the <u><i>Urgent Changes to Planning Documents for Housing</i></u> and were engaged on and adopted by Regional Council in May 2024.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR71*	<p><i>*Includes Attachment.</i></p> <hr/> <p>We have been working to develop a master plan for the Woodlawn Mall site for over a year, but we currently have no pathway for development. The report is here:</p> <p>Woodlawn Mall Report Jan 16.pdf</p> <p>Item C of the minimum planning changes could really help us move forward with a pathway:</p> <p>(c) permit residential uses in all zones, except for all of the following: (i) areas zoned for industrial, military, park, transportation reserve and utility uses,</p> <p>The land is currently zoned as C-3 which permits all "C-2 uses as herein set out, excepting therefrom any residential uses". The C-2 zone permits R-3 uses which allow multi-family developments by development agreement. If the Dartmouth LUB and</p>

	<p>MPS were amended to allow residential uses in the C-3 zone (which are currently not permitted), then we would have a pathway to a DA for the mall site.</p> <p>We would like to see the Dartmouth LUB C-3 zone amended to remove the “excepting therefrom any residential uses” in compliance with Item C of the Minimum Planning Changes. Please accept this email as input into your process of responding to the Province’s minimum planning change requests.</p>
MPR72*	<p>*Includes Attachment.</p> <hr/> <p>Good morning,</p> <p>Please see the attached PDF with comments from Public Health-Central Zone on the proposed Minimum Planning changes.</p> <p>Thank you for the opportunity to provide feedback. [redacted]</p> <hr/> <p>Hello [redacted],</p> <p>Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We’ve recorded the comments from Public Health-Central Zone, and they will be used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR73*	<p>*Includes Attachment.</p> <hr/> <p>Please include the following comments on behalf of the Friends of Halifax Common.</p> <hr/> <p>Hello [redacted],</p> <p>Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We’ve recorded the comments, and they will be used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>

<p>MPR74</p>	<p>Hello</p> <p>I am writing to express my opposition to proposed changes to the Minimum Planning Requirements which is a direct result from the recent provincial changes . I feel that these changes are intended to speed up residential development, but we must ensure that they don't come at the expense of responsible, community-driven planning, especially the type of planning we hope to see for Dartmouth Cove.</p> <p>Also, I strongly disagree with the Province considering giving the Mayor stronger powers to override bylaws, reducing the role of council and public input in major planning decisions. While streamlining processes can have benefits, it's critical that Halifax's growth remains transparent, democratic, and community-focused.</p> <p>Thank you [redacted]</p> <hr/> <p>Hello [redacted],</p> <p>Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be anonymized and used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
<p>MPR75</p>	<p>Hello,</p> <p>Speaking as someone who has been impacted by the housing shortage, I largely support the proposed actions.</p> <p>I have the following concerns about requirements (j) and (l):</p> <ul style="list-style-type: none"> • (j) I feel that the city should retain full power to mandate commercial uses on the ground floor of buildings in order to help create walkable, mixed-use neighbourhoods and also to protect the appeal of commercial streets, which would be diminished by the types of building frontages created by residential uses on the ground floor. • (l) It is my understanding that conventional shipping containers may be treated with chemicals that may pose a hazard to human and environmental health. I am also not convinced that a shipping container makes for a nice place to live and feel that this amounts to more of an architectural gimmick than a genuinely meaningful response to the housing crisis. I support modular and ready-to-move homes, but not shipping containers as housing.

	<p>Thank you, [redacted]</p> <hr/> <p>Hello [redacted],</p> <p>Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be anonymized and used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR76	<p>Hello,</p> <p>I am an HRM resident and have outlined my comments on HRM's proposed Minimum Planning Requirements below:</p> <p>Regarding: "Permit residential uses in all zones, except for...(ii) zones intended to protect the environment, water supply, floodplains or another similar interest;"</p> <ul style="list-style-type: none"> • Adequate environmental protections are needed to ensure our communities are resilient to climate change and we work to halt biodiversity loss. "Protect the environment" is far too vague and must be more specific to provide clarity to community members and developers and avoid future conflict. Let's be smart about where we develop HRM lands and avoid sensitive habitats and ecosystems. HRM must be proactive in protecting ecosystem services (e.g., flood protection from coastal dunes and wetlands) and biodiversity. HRM has legal obligations to protect the environment and wildlife (e.g., critical habitat for species at risk). Please include additional details to improve clarity of this requirement. <p>Regarding: "priority be given to increasing the supply of safe, sustainable and affordable housing in the Municipality over other interests."</p> <ul style="list-style-type: none"> • I support this statement; however, I would like more transparent metrics from HRM on how affordable housing is defined and the quantity of affordable housing that developments include. <p>Regarding: "provide that no requirement for on-site parking applies to residential uses within the urban service area"</p> <ul style="list-style-type: none"> • I support this statement; however, I encourage HRM to ensure that accessible parking is included. <p>Although it's not mentioned in these planning requirements, I would like to see HRM improve planning requirements for outdoor lighting associated with developments towards reducing light pollution.</p> <p>Thank you, [redacted]</p>

	<p>Hello [redacted],</p> <p>Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR77*	<p>*Includes Attachment.</p> <hr/> <p>Dear HRM Planning Team,</p> <p>Please accept the attached Cresco's feedback on the proposed amendments to the minimum planning requirements, along with our request for specific considerations regarding West Bedford/Subarea 9. We believe these insights will contribute positively to the ongoing planning initiatives.</p> <p>Please let us know if you have any questions.</p> <p>Sincerely, [redacted]</p> <hr/> <p>Hello [redacted],</p> <p>Thank you and Cresco for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR78*	<p>*Includes Attachment.</p> <hr/> <p>Dear HRM Regional Planning team,</p>

	<p>I have attached a letter on behalf of the Fathom Studio in response to the Province of Nova Scotia’s amendments to the Halifax Charter’s Minimum Planning Requirements. We appreciate the opportunity to get involved and look forward to hearing the feedback that emerges from this engagement process.</p> <p>Kind regards, [redacted]</p> <hr/> <p>Hello [redacted],</p> <p>Thank you and Fathom Studio for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We’ve recorded the comments, and they will be used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR79	<p>Hi!</p> <p>As a general comment, I find these changes a knee jerk reaction to an immigration policy that could change at any moment, and most insulting to the many years of careful planning by HRM. Most of these suggested changes are short sighted and will not enhance the quality of life for HRM citizens, certainly don't foster healthy and vibrant communities, and are not considerate of the present environment we live in.</p> <p>Rapidly increasing the number of housing units presents many challenges. Too much construction at one time leads to skilled labor availability concerns, quality material supply issues, and substandard construction of these buildings. It also leads to competitiveness in reaching occupancy dates and results in collateral damage to our water, power, natural gas and road infrastructures. It can also contribute to lack of safety procedures being followed and not enough enforcement staff available to police all these sites. Our older combination water/sewage infrastructure is not designed to handle more density, and unable to handle the extra volumes of waste and surface water. Destruction of wetlands such as Eisnor Cove must not be permitted and care must be taken to leave water retention ponds alone so as existing neighbourhoods don't get flooded, as sacrifices for developer profits. Everyone developing on their own schedule results in too many detours and construction zones, doesn't permit good traffic flow and prevents our fire, police, snow clearing, and EMS service from operating efficiently. Allowing construction to take place on all main arteries in the city, with no plan, does not allow for any kind of future plans to develop a mass transit system, or possible evacuation of the peninsula in future. Do</p>

we need to witness more construction causing gas leaks, water main breaks, cranes toppling over onto busy traffic corridors, or excessive truck traffic over our bridges. When looking at HRM's Conservation Design Development Policies, I feel it is essential to carefully design areas considering higher density, as it must include at least two exits in case of fire or access being blocked by railway tracks. Affordable housing is being torn down prematurely in random areas where present owners or landlords can see a profitable outcome. This does not provide any structured plan for a neighbourhood, and results in residents being forced into more expensive housing in areas further from the city core and available services. I feel these planning changes are certainly not designed to enhance the quality of life for families, or the mental health of individuals. High density buildings with few family units, and no plans requiring sufficient green space make for a concrete jungle with resulting wind tunnels. A higher concentration of population will require a plan for schools, which at the moment is way behind schedule, to say nothing of the lack in daycare spaces. The lack of parking spaces in new buildings is a major flaw, as the layout of our HRM and its lack of a mass transit system will continue to have people driving to our big box outlets i.e. Dartmouth Crossing and Bayers Lake. These types of planning changes cannot lead to a 5-minute city. I personally feel that reducing the amount of commercial space in Multi-unit residential buildings is not conducive to having a self-sufficient community where local people can find all the services they require in nearby buildings. Temporary housing for workers would help with the congestion of worker vehicles in the area. Our street, near a construction site, with a one-way segment is often unable to be cleared of snow, as too many work vehicles are parked on both sides of the street. Manufactured housing or converted shipping containers should only be permitted on lots as backyard suites or in a designed community of the same size structures. In conclusion, we must continue to plan with consideration to the needs of the people and not the monetary gain of developers.

Sincerely;
[redacted]

Hello [redacted],

Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.

All the best,

TELINA DEBLY | MCIP, LPP
PLANNER II
REGIONAL PLANNING | PLANNING & DEVELOPMENT

MPR80

Greetings

I am not totally against densification up to six stories high. I am actually in favour of this in the post-WWII new south end, where the housing stock is mainly boring and not distinctive of Halifax. Also the yards are ridiculously large! On the other hand, I am distressed at the wanton destruction of buildings which are part of HALifax's distinct character - I mean the lovely late 19th/ early 20th century buildings built up densely for the most part. The Victorians and Edwardians did not have cars, and kept their buildings close together. We should not be destroying these streetscapes to make way for mid-rises which are already losing their appeal when the glass cladding starts to fall off only ten years after construction.

I need to say that it is important to keep the height of residential buildings manageable for dwelling without elevators, bearing in mind pandemics and power cuts. In Toronto, the covid contagion and death rate was highest in neighbourhoods where people had to travel the elevators in order to get to the grocery store. In the era before elevators, buildings generally did not go higher than six stories, and streetscapes were pleasant to walk along. Halifax will be ruined if we wind up with too many tall glass clad apartment buildings. Please confine this sort of development to the Almon and Robie street area, and maybe certain suburbs where the housing stock is ugly and not as dense as it should be.

So, my message is: go ahead with densification up to six stories in post-WWII Halifax, but keep your eye on preserving housing stock where the houses are close together and distinctive of HALifax.

Sincerely,
[redacted]

Yes to densification up to six stories, but NOT where the houses are already close together, i.e., the Victorian and Edwardian streetscapes.
[redacted]

Hello [redacted],

Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be anonymized and used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.

For some additional context, [in August 2024, the province announced 12 new minimum planning requirements regulations](#). The municipality is legally required to update land use bylaws and plans to meet these requirements. While the minimum planning requirements affect [some specific regulations](#), they do not change the permitted uses (types of dwellings) or density (number of units) set out in the land use by-law zones. The zoning changes identified in your email were previously made

	<p>as part of the <i>Urgent Changes to Planning Documents for Housing</i> and were engaged on and adopted by Regional Council in May 2024.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR81	<p>Hello,</p> <p>I have been reading the 12 Minimum Planning Requirements. I have questions before offering feedback:</p> <p>Of the 12 Requirements, it would seem that all but e) Regional Municipal Planning Strategy (Regional Plan) for the suburban area are put into by-law/legislation or wherever they fall under and public feedback will not/cannot change it. Can you confirm this?</p> <p>Regarding e) it is a lot to take in and perhaps the best way for me to understand is for you to tell me what changes are possible on my street now. And, what changes will be implemented in the Spring as per the following in the fact sheet:</p> <p>“What will this change mean for me? • The municipality will be undertaking a comprehensive planning process for the Suburban area (areas outside of the Regional Centre, where municipal water, wastewater, and transit services are available). Stay tuned for future planning engagement opportunities.”</p> <p>I am on Summer Field Way in Portland Hills, Dartmouth. Present zoning is CDD. My single family small 2 bedroom bungalow is on a 5150sqft lot. Neighbours on my side of the street have similar size lots. So, at the moment or after the plan is finalized in The Spring as above will owners be permitted to:</p> <ol style="list-style-type: none"> 1) put in a backyard suite or shipping container suite in the backyard? Same question if you are on the other side of the street where lots are 11,000sqft +? 2) demolish your existing single family home and build a 4 unit investment/rental property? 3) for the scenarios above, will there be zero requirement to provide parking for the increased density? <p>Can you please confirm that these 3 changes I anticipate on my street are in fact already in place in the Centre Plan in previous R1 zoned neighbourhoods like Crichton Park?</p> <p>I look forward to a speedy and clear reply, [redacted]</p>

Hello [redacted],

Thanks for your email and questions. The municipality is required to comply with the provincial legislation, but as part of the 30-day public engagement period we welcome any questions or comments and will bring them forward in a report to Regional Council.

For requirement (e), the only change we are making at this point is adding language to the Regional Plan that states the intent to do the Suburban Plan – the actual suburban plan is not being released this spring. Staff are working with the Province on how to address the Suburban Planning deadline and will be bringing a report on the Suburban Plan work plan to Regional Council this Spring. More information will be available then, and if you wish to receive an email update when that work plan is released, please email suburbanplan@halifax.ca.

I will also note that some of the items you've mentioned are impacted by the Minimum Planning Requirements:

1. Requirement (L) requires that modular units and converted shipping containers be permitted as residential dwellings across HRM. Municipal land use by-law regulations for dwellings and secondary/backyard suites will still apply. For instance, while a converted shipping container will be eligible for use as a backyard suite, it is still subject to existing regulations for backyard suites like setbacks or lot coverage. Many areas of HRM permit backyard suites – [click here to learn more](#).
2. Requirement (I) requires that residential buildings that are within the Urban Service Area (area serviced with municipal water and sewer) not be required to provide parking. Developers and owners of residential buildings may still voluntarily choose to provide parking spots, but the municipality's by-laws can no longer require a specific number of parking spots.

Since both of those requirements are part of the provincial legislation, all the municipality's existing and upcoming plans (like the suburban plan) will need to comply with them.

If you have any additional questions or comments about the minimum planning requirements please let me know. You are also welcome to contact suburbanplan@halifax.ca for more information on that project.

All the best,

TELINA DEBLY | MCIP, LPP
PLANNER II
REGIONAL PLANNING | PLANNING & DEVELOPMENT

Hello Telina,

Thank you for your answers. I would like to add the following comments for consideration in Shape Your City:

a) & b) responding to Housing Shortage Crisis - do we have updated & ongoing statistics on this?

Who - What demographic and number are in Housing Crisis? Are the Shape your City Plans addressing this need? Are Developers being legislated to address the groups in need?

Through reliable news reports and speaking with community, it is my impression that there are plenty of high-end apartment, condo and single family home developments that have very high price tags and rents. Many of these newly built developments have significant vacancies. These do not address the REAL Housing crisis which is Affordable Housing.

c) do you have a list already of the areas designated "environmentally sensitive, water supply and flood plain? Is there a specific team looking out for and identifying these areas? This is a very important part of the Suburban Plan. Can the Province simply override any environmental concerns?

e) I can categorically state that I am opposed to allowing demolition or modification of single family homes on quiet streets within the "suburbs" which were previously planned as R1 family communities to allow for "as-of-right" four (4) unit buildings. HRM residents who buy in these areas do so because that's the kind of neighborhood they want to live in, not a high density neighborhood as in Urban areas. Examples of these planned existing suburbs are: Colby Village, Forest Hills, Portland Hills & Estates, Crichton Park, Clayton Park, etc. I am not opposed to having Mixed-Residential that is well planned and seamlessly blends with single family homes as in Portland Hills with a well planned areas of condominiums, townhouses and apartments. Nor am I opposed to high density buildings along corridors if they are required to provide parking and not overly impact single family abutting neighborhoods.

i) no parking requirement for new developments- I simply cannot in any way see that this makes sense. Canadians are well and truly married to their vehicles - this will not cut back on vehicles, in truth it will simply add to our shortage of parking and to the ability to clear snow. This is a nightmare in the making. As much as we would like to believe we can be a walking or bicycle region like, say Amsterdam, our climate, hills and distance to amenities will simply not allow it.

l) manufactured housing and shipping containers as backyard suites. I would hope that there are covenants and by-law restrictions for the esthetics of these structures. If not, we may have a proliferation of suites that are not in keeping with the existing architecture and may indeed be unsightly premises.

Thank you for including my comments in your planning.

Sincerely, [redacted]

	<p>Hello [redacted],</p> <p>Thank you for sharing additional comments on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.</p> <p>To your questions -</p> <ul style="list-style-type: none"> - Staff regularly track the statistics for housing data from various sources (Statistics Canada, CMHC, etc.) and bring reports to Council. Here's an example from 2023 of what those reports can look like: PDF - The "environmentally sensitive, water supply and flood plain" areas in the Minimum Planning Requirement (c) refer to zones designed to protect those areas, e.g. a floodplain zone applied around a river that restricts development. You may be interested in the ongoing work around the Sackville Rivers floodplains: https://www.halifax.ca/about-halifax/regional-community-planning/sackville-floodplains. - The zoning changes increasing the number of permitted units in the urban service boundary (places on municipal water and sewer) were previously made as part of the <i>Urgent Changes to Planning Documents for Housing</i> and were engaged on and adopted by Regional Council in May 2024. <p>I'd invite you to email suburbanplan@halifax.ca to be added to their mailing list and be notified when public engagement opportunities are available as part of that project. Thanks again for your comments on the Minimum Planning Requirements, we will include them in the report.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR82	<p>Dear Councilor White and Mayor Fillmore;</p> <p>I am writing to formally express my concerns regarding the recent trend of multi-unit residential developments being approved in areas that have traditionally been designated for single-family homes.</p> <p>As a resident of Regina Terrace, I strongly believe that these projects are not in line with the character and intent of our community, and I urge the City Council and Planning Department to reconsider allowing such developments in strictly residential areas.</p>

The introduction of high-density housing in established neighborhoods raises several concerns, including:

1. Increased Traffic and Parking Issues – Single-family neighborhoods are not designed to accommodate the additional traffic and parking demands that multi-unit buildings bring. This leads to congestion, safety hazards, and difficulty for current residents to park near their homes.
2. Strain on Infrastructure and Public Services – Water, sewage, roads, and emergency services are designed based on the expected density of single-family homes. A sudden increase in population due to multi-unit buildings could overwhelm these services, leading to decreased quality and higher costs for taxpayers.
3. Disruption of Neighborhood Character – Many residents chose to live in these areas because of the quiet, spacious, and family-friendly environment. Large, high-density buildings can disrupt the aesthetic and ambiance of the community, negatively affecting property values and overall livability.
4. Environmental Impact – The removal of green spaces and trees to accommodate large buildings contributes to increased heat, reduced air quality, and loss of natural habitats for local wildlife.

While I understand the need for diverse housing options, I believe that such developments should be strategically placed in areas that can support them without negatively impacting established neighborhoods.

I urge the City Council to enforce zoning regulations that protect residential communities from incompatible high-density construction.

I appreciate your time and consideration of this matter, and I look forward to your response. Please let me know if there are any public meetings or opportunities for residents to voice their concerns.

Sincerely,
[redacted]

Hello [redacted],

Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be anonymized and used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.

For some additional context, [in August 2024, the province announced 12 new minimum planning requirements regulations](#). The municipality is legally required to update land use bylaws and plans to meet these requirements. While the minimum planning requirements affect [some specific regulations](#), they do not change the permitted uses (types of dwellings) or density (number of units) set out in the land use by-law zones. The ER-3 zoning changes identified in your email were previously made as part of the [Urgent Changes to Planning Documents for Housing](#) and were engaged on and adopted by Regional Council in May 2024.

	<p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
<p>MPR83</p>	<p>Good evening:</p> <p>I am writing to formally express my concerns regarding the proposed minimum planning requirements. I am part of the Liveable Halifax /K’jipuktuk Coalition, an alliance of communities and citizens who actively support smart development and densification in HRM,</p> <p>The introduction of the proposed planning requirements in established neighbourhoods raises several concerns, including:</p> <ol style="list-style-type: none"> 1. Increased Traffic and Parking Issues – Single-family neighborhoods are not designed to accommodate the additional traffic and parking demands that multi-unit buildings bring. This leads to congestion, safety hazards, and difficulty for current residents to park near their homes. 2. Strain on Infrastructure and Public Services – Water, sewage, roads, and emergency services are designed based on the expected density of single-family homes. A sudden increase in population due to multi-unit buildings could overwhelm these services, leading to decreased quality and higher costs for taxpayers. 3. Disruption of Neighborhood Character – Many residents chose to live in these areas because of the quiet, spacious, and family-friendly environment. Large, high-density buildings can disrupt the aesthetic and ambiance of the community, negatively affecting overall livability and sense of community. 4. Environmental Impact – The removal of green spaces and trees to accommodate large buildings contributes to increased heat, reduced air quality, and loss of natural habitats for local wildlife. <p>The minimum planning requirements should:</p> <ul style="list-style-type: none"> o Prioritize affordable housing (30% of income); o Mitigate potential harms arising from developments; o Mandate real consultation with existing communities before developments are approved; o Address infrastructure pressures; o Ensure public safety with updated evacuation routes; and o Align projects with current strategies such as the Integrated Mobility Plan and the Environmental Protection Plan. <p>However, the unruly approach to densification we’re now witnessing is concerning. Basic checks and balances, to ensure the quality of our urban environment, have been erased from planning reviews. This breakneck speed of development has already had a negative impact on:</p> <ul style="list-style-type: none"> • City services • Traffic

- Heritage Preservation; and
- Green Spaces

Furthermore, there's rising dissatisfaction throughout the city because people's voices aren't being heard. Our communities are being radically altered without our input. That's why we're asking that:

- Priority be given to developments meeting the planning requirements that are safe, sustainable and affordable (30% of income)
- Specific risk-management strategies be established to address the above mentioned requirements, including adding in regular evaluations to monitor impacts on these changes
- Mandate a three-month period of active community engagement and involvement to the zoning bylaws before the approval of any development project.
- Withdraw Councils (Council Meeting dated, October 1, 2024 section 15.1.4 - 2) request for legal protection by the Province.

I respectfully request that you take into consideration these concerns and requested actions.

Sincerely,
[redacted]

Hello [redacted],

Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be anonymized and used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.

For some additional context, in August 2024, the province announced 12 new minimum planning requirements regulations. The municipality is legally required to update land use bylaws and plans to meet these requirements. While the minimum planning requirements affect some specific regulations, they do not change the permitted uses (types of dwellings) or density (number of units) set out in the land use by-law zones. Zoning changes to the ER-3 zone on the Halifax Peninsula and areas serviced with municipal water and sewer were previously made as part of the *Urgent Changes to Planning Documents for Housing* and were engaged on and adopted by Regional Council in May 2024.

All the best,

TELINA DEBLY | MCIP, LPP
PLANNER II
REGIONAL PLANNING | PLANNING & DEVELOPMENT

<p>MPR84</p>	<p>Good afternoon,</p> <p>I disagree with the proposed changes to requirements for apartment buildings, especially that there be no parking requirements.</p> <p>[redacted]</p> <hr/> <p>Hello [redacted],</p> <p>Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be anonymized and used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
<p>MPR85</p>	<p>As a concerned resident of Halifax, I feel compelled to address the recent changes to our city's planning guidelines. In August 2024, the Province of Nova Scotia introduced amendments to the Minimum Planning Requirements under the Halifax Regional Municipality Charter, aiming to prioritize the rapid increase of housing supply in our region.</p> <p>These provincial directives mandate that our municipal planning strategies and land-use bylaws align with the urgent need for more housing. However, it appears that the Halifax Regional Council and municipal staff have been slow to implement these changes. Despite the province's clear instructions, the municipality initiated a 30-day public engagement period from January 24 to February 24, 2025, to discuss the upcoming changes.</p> <p>While public consultation is valuable, the pressing nature of our housing crisis necessitates swift action. The delays in adopting the required amendments not only hinder progress but also exacerbate the challenges faced by those seeking affordable housing in Halifax.</p> <p>It's essential that our municipal leaders recognize the urgency of this situation and act promptly to align local policies with provincial directives. By doing so, we can address the housing shortage effectively and ensure that Halifax remains a vibrant and inclusive community for all.</p> <p>Halifax's Planning Bureaucracy is Undermining Its Own Government</p> <p>The Province of Nova Scotia made a clear decision: housing supply needs to increase, and Halifax's planning policies must be streamlined to make that happen.</p>

	<p>The authority to make this change is entirely within the provincial government’s jurisdiction, and yet, here we are—delayed, stalled, and dragged into another round of public “consultation.”</p> <p>This is not an effort to listen to the public; it’s a deliberate attempt by Halifax’s bureaucratic and council class to resist the authority of their own government. Instead of following clear provincial direction, they are using the slow, procedural workings of municipal governance to obstruct and delay—buying time, stirring up opposition, and trying to keep control in their hands.</p> <p>It’s become obvious that Halifax’s real housing problem isn’t supply or demand—it’s a siloed city bureaucracy, both too powerful and too afraid, that refuses to be accountable. This move to appeal to the public on a settled provincial matter is not about democracy; it’s about power. It’s about unelected municipal staff and their allies on council trying to hold on to control by usurping the authority of the government that actually represents Nova Scotians.</p> <p>The bottom line? The delays, the consultations, the endless roadblocks—these aren’t accidents. They’re a strategy. And they’re costing this city its future.</p> <p>My comment: Just stop it. [redacted]</p> <hr/> <p>Hello [redacted],</p> <p>Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We’ve recorded your comments, and they will be used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR86	<p>To Whom It May Concern,</p> <p>Like many other Haligonians, I am reaching out asking that you listen to and act on our concerns. R3 zoning is changing the character of old, established, livable, charming Halifax neighbourhoods in favour of densification with little consideration for the destructive ramifications.</p> <p>Key Concerns About the Proposed Zoning Changes</p> <ul style="list-style-type: none"> • Higher Rents: The zoning changes won’t address the affordability crisis. Developers will not be required to include affordable housing, and rents will

continue to rise. In HRM, the average rent for a two-bedroom apartment is already \$1700/month.

- **Increased Traffic:** Halifax’s roads are already clogged, and HRM plans to add over 15,000 new housing units by 2026. What impact will this have on our already overwhelmed infrastructure?
- **Lack of Parking:** The new zoning bylaws will no longer require developers to provide adequate parking for new buildings. This means even more cars will be forced to park on our already crowded streets.
- **Strained Infrastructure:** Water, wastewater, schools, hospitals, and public transportation are already overburdened. Pushing through zoning changes without addressing these issues first will only make things worse.
- **Vanishing Green Spaces and Trees:** These zoning changes will weaken protections for trees and green spaces. If a tree is in the way of development, it could be removed, leading to a significant loss of urban nature.
- **Endangered Heritage:** Our city’s historic streetscapes, including many Victorian and Georgian buildings, are at risk of demolition. Halifax’s heritage is under threat.
- **Vacant Lots:** HRM already has over 12,000 vacant lots, but new zoning bylaws do not prioritize development on these existing empty spaces. This means more buildings could be torn down instead of developing unused land.
- **Decreased Safety:** Increased density without improvements to evacuation routes could pose serious safety risks. It’s already difficult to leave the peninsula at rush hour; what happens if there’s an emergency?

There are many examples of prosperous, destination-worthy cities being thoughtlessly overdeveloped, ending up being places to avoid rather than visit. Don’t do the same to Halifax.

[redacted]

Hello [redacted],

Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We’ve recorded your comments, and they will be anonymized and used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.

For some additional context, [in August 2024, the province announced 12 new minimum planning requirements regulations](#). The municipality is legally required to update land use bylaws and plans to meet these requirements. While the minimum planning requirements affect [some specific regulations](#), they do not change the permitted uses (types of dwellings) or density (number of units) set out in the land use by-law zones. The ER-3 zoning changes identified in your email were previously made as part of the [Urgent Changes to Planning Documents for Housing](#) and were engaged on and adopted by Regional Council in May 2024.

	<p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR87	<p>Hello</p> <p>Regarding: 117 Kearney Lake road redevelopment plan.</p> <p>This message is to strongly oppose the plan NOT to include ground floor shops/services as part of the new high-rise development plan here in the Wedgewood area - specifically at 117 Kearney lake road.</p> <p>We moved to the Wedgewood area (and currently live at [redacted] Halifax, Nova Scotia, [redacted]) approximately 3 years ago. One of the reasons which shaped our decision to relocate here was 1. the quality of a e'cole Grosvenor Wentworth School (minutes away) and 2. the accessibility of shops located just at the bottom of broadhome – Wedgewood Park subdivision.</p> <p>We personally use these shops and services on a daily basis and it's absolutely appalling to think that the shops will be removed and nothing implemented in there place. Removal of the shops will force residents in this area either onto the Bedford Highway to complete errands and activities on the peninsula or more likely, onto the 102 to the Larry Uteck/peakview way area which is already absolutely overloaded.</p> <p>This is Ludacris considering that that section of the highway is nearly unmanageable with multiple accidents and hold ups and disruptions several days per week. It's also appalling to realize that the existing pre-primary program, which is housed at the current Kearney Lake complex, will be removed as a result of this poorly planned redevelopment.</p> <p>This is not the way to develop specific areas of the city. There seems to be little planning and consideration into the development of healthy sustainable communities. Many residents of Wedgewood feel the same way and are concerned and have expressed their concerns to various outlets.</p> <p>Maintaining shops on the ground floor of the new development plan will enable residents in the area, which include hundreds of residents from nearby apartment buildings, to continue to complete daily shops and errands closer to home which will ultimately help decrease the already congested 102 between the Larry Uteck and Kearney Lake exits.</p> <p>The current shops include coffee, pizza, dental care, hair, a pre-primary program, liquor store, a Filipino grocery store, etc. We understand the need to provide housing for an exploding population – and we're pleased to see the height restrictions recently enforced for this development, however removing all shops and services in this one specific local area - to provide increased housing ONLY is not the answer. Removing a</p>

pre-primary program is not the answer. Removing all stores which provide outcomes to daily needs, is not the answer!!

There was a charm to this area offering services and shops close by. Residents here do not feel part of the Larry Uteck and West Bedford areas, nor should we. We are not part of the peninsula and although many people use old Clayton Park shops and services including ourselves, many of us tend to use the current shops and services located at the bottom of broadhome, on an everyday basis. My son and I walk to Tim Hortons after school regularly with groups of his peers - to grab a hot chocolate on cold winter days; we regularly access the Filipino grocery store in order to purchase fresh produce; my husband has had his haircut at the salon within that complex; and we grab the odd bottle of wine for special occasions- all services offered at the "bottom of the hill."

Removing all ground floor services at 117 Kearney Lake road feels like simply creating another "urban subdivision," which will force residents to travel beyond their local community in order to complete daily activities and tasks. This is unacceptable and farsighted.

I feel we need to keep the services present. It's nearly devastating that the local school our son attends is already bursting at the seams with overcrowding..... enabling this development to occur without shops or services to support the growing population, just adds insult to injury.

We purposely [redacted] due to the great reputation of a Grosvenor Wentworth's French immersion program. This feels like we will be robbed of our current shops and services just to accommodate housing for other residents. We understand that it is important to provide additional housing amidst a housing crisis situation and we welcome that, however, not at the expense of current residents losing ALL nearby shops and services.

This doesn't seem to be a very healthy approach to the growing population within specific communities. It's illogical to push residents who already possess services into other communities and force them onto the highways which are already busting at the seams, just for a few extra apartments to be included on the ground floor of a new development project.

We strongly oppose this decision. We are not asking that all shops and services be replaced and implemented in the new building project, however, a couple of key services should remain!!

Extremely concerned and sincerely, [redacted]

Hello [redacted],

Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and

	<p>they will be used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.</p> <p>To add some context, the Minimum Planning Requirements introduced by the province mean that for multi-unit residential buildings that begin construction before April 1, 2027, the municipality's by-laws cannot require more than 20% of the ground floor to be commercial uses. However, property owners/developers can still choose to provide more than 20% commercial if they wish. The 117 Kearney Lake Road request is being considered as part of the Urgent Changes to Planning Document for Housing Additional Opportunity Site Requests process (https://www.halifax.ca/business/planning-development/applications/minorrev-2024-01198-urgent-changes-planning-documents). Staff working on that project can be reached at haf@halifax.ca.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR88	<p>Greetings,</p> <p>This letter is in regard to the Minimum Planning Changes that the Province of Nova Scotia has made to the Halifax Charter’s Minimum Planning Requirements.</p> <p>I believe in and support affordable housing. However, many of these changes do not constitute a good solution for Halifax and Haligonians. We want sustainable, planned communities – Clayton Park is a prime example of a density design that works.</p> <p>Firstly, I am opposed to Making housing a priority over other interests identified in the municipal planning strategy for the following reasons:</p> <p style="padding-left: 40px;">As a resident and taxpayer in Halifax, I am opposed to housing taking precedence over other interests such as improvements to infrastructure, improvements to the public transportation system, improvements to traffic flows and improvements to policing.</p> <p style="padding-left: 40px;">If issues such as these become lower priorities, then does housing really matter?</p>

The housing crisis has not occurred solely because of normal, natural growth, but instead from economic shocks – the pandemic; baby-boom retirements & east coast affordability; war and aggressive immigration policies.

The housing crisis is also a function of failures in provincial departments like Healthcare, specifically mental health and addictions, and Education or lack thereof because of its one size fits all approach and dated curriculum.

While Canada, Nova Scotia and Halifax can benefit from migration and immigration, there needs to be a more methodical approach and more public information available on who is coming here; why are they coming here; what are they doing and how long are they staying? Are they actually contributing to a larger and a more stable tax base?

Taxpayers are not yet seeing the benefits of interprovincial migration and aggressive immigration policies in our bottom lines, instead taxes and severe shortages, affecting many government functions, continue to increase.

Purchasing property in Halifax, then moving to another Canadian province, being an absentee landlord or being out of the country for the maximum allowable time is NOT an economic boom for Halifax. Instead, it is a drain on things like housing affordability, housing availability, communities and the social welfare system.

Next, I am opposed to removing on-site parking for residential uses within the Urban Service Area.

This is absurd and will create greater street and traffic congestion. Tenants will have vehicles, so unless there are major changes to this area such as relocating government and quasi government offices off the peninsula, allowing flexible working arrangements; staggering work hours; rethinking the location of City Hall and an overhaul of the public transit system. City services such as winter maintenance operations; emergency service vehicles and buses as well as transport trucks servicing the two major Halifax ports will continue struggle to operate within the city.

Next, I am opposed to allowing temporary housing on or near construction worksites.

This is a safety issue with large machinery and blasting taking place. Nearby residents also need to know what type of temporary housing is being proposed and how it will be serviced – water? waste? electricity? sewage? mail delivery? parking and etc?

Finally, I am opposed to allowing converted shipping containers as a dwelling or backyard suite.

This change overrides or “trumps” the restrictive covenants that homeowners in certain neighborhoods have legally agreed to. These covenants were put in place to protect the character and integrity of the community, and this change compromises those protections, leaving homeowners vulnerable to changes they never agreed to when they purchased their properties.

The Province claims this is about creating affordable housing, but in reality, it places the burden on homeowners to pay for and build additional units, hook up services, and deal with rising property taxes. This is NOT affordable housing.

In conclusion, there has been little transparency about this process, these “Shape Your City” communications are complicated and do not reach most constituents effectively – what is the response rate? Letters have not been sent out to each resident notifying them of these changes and these changes will impact the very fabric of our communities – one of the reasons cited by post secondary graduates (a few years before the pandemic) as a reason to stay in Halifax after graduating.

These changes are far too significant to be made without a referendum.

Many thanks,
[redacted]

Hello [redacted],

Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We’ve recorded your comments, and they will be used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.

All the best,

TELINA DEBLY | MCIP, LPP
PLANNER II
REGIONAL PLANNING | PLANNING & DEVELOPMENT

MPR89

Your Worship Mayor Filmore and Council:

I am writing to formally express my concerns regarding the recent trend of multi-unit residential developments being approved in areas that have traditionally been designated for single-family homes.

As a resident of the Southend of Halifax, I strongly believe that these projects are not in line with the character and intent of our community, and I urge you to reconsider allowing such developments in strictly residential areas.

The introduction of high-density housing in established neighborhoods raises several concerns, including:

1. **Increased Traffic and Parking Issues** – Single-family neighborhoods are not designed to accommodate the additional traffic and parking demands that multi-unit buildings bring. This leads to congestion, safety hazards, and difficulty for current residents to park near their homes.
2. **Strain on Infrastructure and Public Services** – Water, sewage, roads, and emergency services are designed based on the expected density of single-family homes. A sudden increase in population due to multi-unit buildings could overwhelm these services, leading to decreased quality and higher costs for taxpayers.
3. **Disruption of Neighborhood Character** – Many residents chose to live in these areas because of the quiet, spacious, and family-friendly environment. Large, high-density buildings can disrupt the aesthetic and ambiance of the community, negatively affecting property values and overall livability.
4. **Environmental Impact** – The removal of green spaces and trees to accommodate large buildings contributes to increased heat, reduced air quality, and loss of natural habitats for local wildlife.

While I understand the need for diverse housing options, I believe that such developments should be strategically placed in areas that can support them without negatively impacting established neighborhoods.

I urge you to enforce zoning regulations that protect residential communities from incompatible high-density construction.

I appreciate your time and consideration of this matter, and I look forward to your response. Please let me know if there are any public meetings or opportunities for residents to voice their concerns.

Sincerely,

	<p>[redacted]</p> <hr/> <p>Hello [redacted],</p> <p>Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be anonymized and used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.</p> <p>For some additional context, <u>in August 2024, the province announced 12 new minimum planning requirements regulations</u>. The municipality is legally required to update land use bylaws and plans to meet these requirements. While the minimum planning requirements affect <u>some specific regulations</u>, they do not change the permitted uses (types of dwellings) or density (number of units) set out in the land use by-law zones. The zoning changes identified in your email were previously made as part of the <u><i>Urgent Changes to Planning Documents for Housing</i></u> and were engaged on and adopted by Regional Council in May 2024.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR90	<p>This is a lot for the average person to digest. It sounds like things are being pushed through at the same time other surveys that are closely related to this are being pushed out, causing confusion.</p> <p>After this meeting, it should come back for public consultation and review before being set in stone and implemented.</p> <p>[redacted]</p> <hr/> <p>Hello [redacted],</p> <p>Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.</p> <p>If you have any questions about the proposed changes, we are happy to answer them over email or set up a phone call to explain further.</p> <p>All the best,</p>

	<p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
<p>MPR91</p>	<p>To Whom It May Concern,</p> <p>Like many other Haligonians, I am reaching out asking that you listen to and act on our concerns. R3 zoning is changing the character of old, established, livable, charming Halifax neighbourhoods in favour of densification with little consideration for the destructive ramifications.</p> <p>Key Concerns About the Proposed Zoning Changes</p> <ul style="list-style-type: none"> • Higher Rents: The zoning changes won't address the affordability crisis. Developers will not be required to include affordable housing, and rents will continue to rise. In HRM, the average rent for a two-bedroom apartment is already \$1700/month. • Increased Traffic: Halifax's roads are already clogged, and HRM plans to add over 15,000 new housing units by 2026. What impact will this have on our already overwhelmed infrastructure? • Lack of Parking: The new zoning bylaws will no longer require developers to provide adequate parking for new buildings. This means even more cars will be forced to park on our already crowded streets. • Strained Infrastructure: Water, wastewater, schools, hospitals, and public transportation are already overburdened. Pushing through zoning changes without addressing these issues first will only make things worse. • Vanishing Green Spaces and Trees: These zoning changes will weaken protections for trees and green spaces. If a tree is in the way of development, it could be removed, leading to a significant loss of urban nature. • Endangered Heritage: Our city's historic streetscapes, including many Victorian and Georgian buildings, are at risk of demolition. Halifax's heritage is under threat. • Vacant Lots: HRM already has over 12,000 vacant lots, but new zoning bylaws do not prioritize development on these existing empty spaces. This means more buildings could be torn down instead of developing unused land. • Decreased Safety: Increased density without improvements to evacuation routes could pose serious safety risks. It's already difficult to leave the peninsula at rush hour; what happens if there's an emergency? <p>There are many examples of prosperous, destination-worthy cities being thoughtlessly overdeveloped, ending up being places to avoid rather than visit. Don't do the same to Halifax.</p> <p>[Redacted]</p> <hr/> <p>Hello [redacted],</p>

	<p>Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be anonymized and used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.</p> <p>For some additional context, <u>in August 2024, the province announced 12 new minimum planning requirements regulations</u>. The municipality is legally required to update land use bylaws and plans to meet these requirements. While the minimum planning requirements affect <u>some specific regulations</u>, they do not change the permitted uses (types of dwellings) or density (number of units) set out in the land use by-law zones. The ER-3 zoning changes identified in your email were previously made as part of the <u><i>Urgent Changes to Planning Documents for Housing</i></u> and were adopted by Regional Council in May 2024.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR92	<p>I do not agree with making housing the priority over all else.</p> <p>I also do not agree with reducing the amount of ground floor commercial space in new builds.</p> <p>[redacted]</p> <hr/> <p>Hello [redacted]</p> <p>Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>

MPR93

Dear City Staffer,

Halifax needs more affordable housing and increased density. However, we must have responsible design. Regulations and zoning must preserve the heritage and character of Halifax and trees and green space are essential, forty story apartment towers that are built to the sidewalk without green space at ground level are not. Our infrastructure is not ready for huge buildings, for example, the recent escalation in traffic is very unpleasant.

And please do not raze Beaufort Avenue Park. The park does what parks around the world do: parks contribute to the well being of citizens and cities.

I have lived in a single family home across the street from a three story plus attic, multi-unit apartment building for 32 years. The apartment building [redacted]. Our visitors are surprised to learn that the building has six apartments because the design fits the character of the neighbourhood. The apartment building looks like the other homes on our tree-lined street. One year the student occupants were noisy and inconsiderate of their neighbours, so the landlord addressed the problem. Otherwise, the apartment building has been an excellent example of increased density in a neighbourhood.

Please consider what has made Halifax, the city of trees, so livable. Keep up your hard work and ensure more people can enjoy our beautiful city, without removing its heritage, character, and green space.

Sincerely,

[redacted]

Hello [redacted],

Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be anonymized and used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.

For some additional context, in August 2024, the province announced 12 new minimum planning requirements regulations. The municipality is legally required to update land use bylaws and plans to meet these requirements. While the minimum planning requirements affect some specific regulations, they do not change the permitted uses (types of dwellings) or density (number of units) set out in the land use by-law zones.

All the best,

TELINA DEBLY | MCIP, LPP

PLANNER II

REGIONAL PLANNING | PLANNING & DEVELOPMENT

<p>MPR94*</p>	<p>*Includes Attachment.</p> <hr/> <p>Good Afternoon,</p> <p>I would like to submit a response letter to the 12 New Minimum Planning Requirement Regulations.</p> <p>I have attached the document as a PDF. Here is link if needed [redacted].</p> <p>Please let me know if you need anything else from me.</p> <p>I would love to know when the public hearing for this issue will be.</p> <p>Have a terrific day!</p> <p>[redacted]</p> <hr/> <p>Hello [redacted],</p> <p>Thank you and the Lucasville Vision Committee for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded the comments, and they will be used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.</p> <p>I can add your name to the mailing list if you'd like to be notified of the public hearing – let me know.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
<p>MPR95</p>	<p>Dear Mayor Fillmore</p> <p>We all recognize that our city is in dire need of affordable housing.</p> <p>But the unruly approach to densification we're now witnessing is concerning. Basic checks and balances to ensure the quality of our urban environment have been erased from planning reviews.</p> <p>The breakneck speed of development has already had a negative impact on</p> <ul style="list-style-type: none"> - city services - traffic - parking - heritage preservation - and green space

What's worse, the new zoning bylaws do little to ensure more affordable housing. Historic streetscapes are being razed to build apartment towers with rents well over \$2000/month. Relying on a 'trickle-down effect' is not a well-grounded planning strategy to provide Haligonians with the homes they need at a price they can afford. The changes these bylaws allow will be irreversible. Before our city is damaged beyond repair, we ask that you put in place specific risk-management strategies to

- mitigate potential harms arising from developments;
- mandate real consultation with existing communities before developments are approved;
- address infrastructure weaknesses;
- ensure public safety with updated evacuation routes; and
- align projects with current strategies such as the Integrated Mobility Plan and the Environmental Protection Plan.

Clearly even HRM council has concerns about these changes could do to the city. People are already angry at the traffic, infrastructure demands and loss of character in the city. That's why Council has asked the Province for legal protection from potential citizen claims of "constructive taking and de facto expropriation of private property" by allowing such rapid and unchecked development in HRM as a result of the Provincial Regulations.

That's why we're asking that zoning bylaws mandate a three-month period of active community engagement and involvement before the approval of any development project. We also ask Council to withdraw this request for legal protection by the Province.

[redacted]

Hello [redacted],

Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.

For some additional context, [in August 2024, the province announced 12 new minimum planning requirements regulations](#). The municipality is legally required to update land use bylaws and plans to meet these requirements. While the minimum planning requirements affect [some specific regulations](#), they do not change the permitted uses (types of dwellings) or density (number of units) set out in the land use by-law zones. The zoning changes identified in your email were previously made as part of the [Urgent Changes to Planning Documents for Housing](#) and were adopted by Regional Council in May 2024.

All the best,
TELINA DEBLY | MCIP, LPP
PLANNER II
REGIONAL PLANNING | PLANNING & DEVELOPMENT

MPR96

Dear Halifax planner,

The Liveable Halifax Coalition is an alliance of communities and citizens who actively support smart development and densification in HRM. We all recognize that our city is in dire need of affordable housing.

But the unruly approach to densification we're now witnessing is concerning. Basic checks and balances, to ensure the quality of our urban environment, have been erased from planning reviews. And no wonder.

The breakneck speed of development has already had a negative impact on

- **city services**
- **traffic**
- **parking**
- **heritage preservation**
- **and green space**

What's worse is that the new zoning bylaws do little to ensure increased levels of affordable housing. City streetscapes are being razed to build apartment towers with rents well over \$2000/month. Relying on a 'trickle-down effect' is not a well-grounded planning strategy to ensure that people have the homes they need at a price they can afford.

The changes these bylaws allow will be irreversible. Before our city is damaged beyond repair, we ask that you put in place specific risk-management strategies to

- mitigate potential harms arising from developments;
- mandate real consultation with existing communities before developments are approved;
- address infrastructure pressures;
- ensure public safety with updated evacuation routes; and
- align projects with current strategies such as the Integrated Mobility Plan and the Environmental Protection Plan.

There's rising dissatisfaction throughout the city because people's voices aren't being heard. Their communities are being radically altered without their input.

We understand our new mayor and many councillors have expressed nervousness about unfettered growth. Further, Council has asked the Province for legal protection from potential citizen claims of "constructive taking and de facto expropriation of private property" by allowing such rapid and unchecked development in HRM as a result of the Provincial Regulations.

That's why we're asking that zoning bylaws mandate a three-month period of active community engagement and involvement before the approval of any development project. We also ask Council to withdraw this request for legal protection by the Province.

Thank you!

	<p>Sincerely, [redacted]</p> <hr/> <p>Hello [redacted],</p> <p>Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be anonymized and used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.</p> <p>For some additional context, <u>in August 2024, the province announced</u> 12 new minimum planning requirements regulations. The municipality is legally required to update land use bylaws and plans to meet these requirements. While the minimum planning requirements affect <u>some specific regulations</u>, they do not change the permitted uses (types of dwellings) or density (number of units) set out in the land use by-law zones.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR97	<p>Good morning HRM Planning,</p> <p>After reading your Minimum Planning changes in Halifax information sheet, and having had some discussion with HRM Planning staff, it remains unclear to me that the Provincially imposed planning changes properly address the current housing crisis. I support efforts to accelerate construction of housing projects, but pace of construction must still be balanced with sustainable development which includes proper infrastructure and respect of environmental issues. The Province appears to have adopted a 'build at all costs' approach in HRM. I am concerned development will out pace infrastructure improvements. I would encourage HRM Planning to resist cutting corners with planning best practice as much as possible, given the Province's heavy handed approach.</p> <p>It appears the Province is using the broad context of 'housing crisis' to accelerate construction of any and all projects. The crisis of housing in HRM at present is 'affordable' housing, which I do not see as being directly addressed by the Planning changes. Where is the requirement for developments to include some portion of 'affordable' units? Has HRM or the Province actually defined 'affordable housing' or have a strategy to protect some portion of units at an affordable cost?</p> <p>Requirement (b) is of concern to me. It appears to push 'building more' ahead of all other considerations, which I fear sets HRM up for development errors, which once built are difficult to undo. Think Cogswell exchange. I am concerned with the nature and scale, in particular heights of buildings, of some proposals in relation to the</p>

	<p>existing communities, which if allowed to proceed will permanently alter the community. My hope is HRM continues to consider the concerns of existing communities in relation to new development.</p> <p>I appreciate the concept of removing barriers to efficient increase in housing projects, and I do consider some of the Planning Requirements as having that effect, but still needs to be implemented in balance with other development considerations.</p> <p>My comments may not be overly helpful in that they are general in nature. In summary, despite the power of the Province, my request is that HRM continue to follow planning best practice, and solicit and include community input in project approvals.</p> <p>[redacted]</p> <hr/> <p>Hello [redacted],</p> <p>Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR98	<p>This rezoning in the Halifax South End makes absolutely no financial sense. It will not provide more affordable housing.</p> <p>Anyone can see that this proposal only makes sense for those who want to sell and those who want to buy. These folks will make a lot of money from building high-density housing in the South End. This will most certainly not be affordable housing. We also do not have the infrastructure to support high-density housing in the South End.</p> <p>The beauty is that we now all have access to information on the Internet. We will know who makes money from this rezoning and how many affordable units are built.</p> <p>Regards [redacted]</p> <hr/> <p>Hello [redacted],</p>

	<p>Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be anonymized and used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.</p> <p>For some additional context, in August 2024, the province announced 12 new minimum planning requirements regulations. The municipality is legally required to update land use bylaws and plans to meet these requirements. While the minimum planning requirements affect some specific regulations, they do not change the permitted uses (types of dwellings) or density (number of units) set out in the land use by-law zones. The ER-3 zoning changes identified in your email were previously made as part of the Urgent Changes to Planning Documents for Housing (https://www.halifax.ca/about-halifax/regional-community-planning/housing-accelerator-fund/urgent-changes-planning-0) and were adopted by Regional Council in May 2024.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR99	<p>Hello Shawn and Planning Department,</p> <p>Please accept this submission as an objection to the proposed HAF amendments that will "UP ZONE" existing residential neighbourhoods in HRM.</p> <p>The Centre Plan has created many opportunities for new housing - many are currently under construction.</p> <p>With slowing population growth, along with the completion of recent housing projects, HRM rents have stabilized and appear to be under downward pressure, according to CMHC. This would indicate that housing may already be in equilibrium and moving towards a surplus, considering the many new housing projects currently under construction and expected to be completed within the next three years.</p> <p>Before stressing existing neighborhoods with added density and the negative issues that will follow, please consider allowing the existing "as of right opportunities" be exploited under the Centre Plan before "UP ZONING" existing residential neighbourhoods.</p> <p>Thank you, [redacted]</p> <hr/> <p>Hello,</p>

	<p>Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be anonymized and used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.</p> <p>For some additional context, <u>in August 2024, the province announced 12 new minimum planning requirements regulations</u>. The municipality is legally required to update land use bylaws and plans to meet these requirements. While the minimum planning requirements affect <u>some specific regulations</u>, they do not change the permitted uses (types of dwellings) or density (number of units) set out in the land use by-law zones. The zoning changes identified in your email were previously made as part of the <u><i>Urgent Changes to Planning Documents for Housing</i></u> and were adopted by Regional Council in May 2024.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR100	<p>To whom It May Concern,</p> <p>I writing to you today about the public engagement phase regarding the Minimum Planning Requirements: Land-use by-laws the HRM will be adopting regarding the HRM Regional Plan.</p> <p>Engagement, should we call it that, ends today.</p> <p>This engagement consisted of a post to Facebook by HRM asking for feedback from constituents regarding the land-use by-laws.</p> <p>The public engagement appears to simply be to post and repost the announcement regarding the requirements and asking people for their feedback to an email.</p> <p>There was a link to the HRM website where one could read and attempt to understand and sift through all that was posted on the initial page as well as all the embedded links on the page to further information. However, without proper communication, knowledge or guidance regarding all of the information posted, it is hard to determine the potential outcomes of adopting the by-laws and how they could positively or negatively affect the neighbourhood in which I live.</p> <p>Therefore, it is baffling to me and of grave concern how councillors can adopt said by-laws on my behalf without proper public community engagement with the districts they are responsible to and are supposed to serve.</p> <p>Therefore, I respectfully request a delay in adoption of these by-laws to ensure that proper and robust public engagement takes place in the various districts individually</p>

and HRM as a whole. There must be town halls where the councillors can speak to the by-laws and what the adoption of them will mean for the districts they serve. Without this, as far as I am concerned, there was no public engagement regarding these by-laws – there was simply public awareness provided.

Please Note – As of Today – February 24, 2025

I just went looking to see which councillors posted about the Public Engagement regarding this on their Facebook pages, the Minimum Planning Requirements that ends today at 4:00.

Of the 16 councillors and 1 mayor. The mayor and 8 of the 16 councillors did not post about this on their Facebook communication platforms. Or anywhere that I could find.

The 8 councillors that posted the HRM post regarding this were: White, Kent, Purdy, Cuttell, Steele, Hartling, Gillis, St-Amand. A couple of them reposted a couple of times. 1 multiple times - Patty Cuttell -district 11.

The only councillor that I have been able to determine from what I have found who truly asked for and provided an opportunity to her constituents for providing feedback, getting clarification and true public engagement was Janet Steele – District 12 with a town hall that took place in her district on January 30 with her, the MLA: Iain Rankin and the MP: Lena Diab.

This is the work we need. All 3 levels of government coming together to work and meet with their constituents.

We want to ensure that as HRM grows that the various forms of development plans for our homes, our green spaces, our neighbourhoods, our municipality, provide a safe, livable community in which to live and thrive.

Thank-you,
[redacted]

Hello [redacted],

Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.

If you have any questions about the changes, staff are happy to answer them over email or phone.

All the best,

	<p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
<p>MPR 101</p>	<p>Hi there,</p> <p>I'm not one to fuss much about city issues. I certainly keep a close eye on things, but my name isn't one you've seen in your inbox previously. However, I was disappointed that I didn't see any real conversation around the new blanket zoning changes. I just found out yesterday that the deadline to voice my opinion was end of day today. Now, I may have missed this previously. I certainly was aware that this was coming up to be discussed, but that was as much info as I seemed to get about it. This is why I'm writing today.</p> <p>I'm well aware that there is a housing crisis and I'm in agreement that we need more affordable housing. Living in the West-end off of Windsor Street, I've also experienced more blasting and building within a one to three block radius the past seven years than I have in my entire life living in other countries and other provinces. My old house has more stress cracks in its plaster, and now in its foundation, than I care to admit. I feel like I'm doing my part to support all of this even though the traffic, mess and congestion - not to mention wear and tear on my house and my patience - is wearing a bit thin.</p> <p>I like the current mix of housing in my area (cc'ing Shawn Cleary as he's my councillor). I purposefully bought in the west end because of it - I like the variety. We also have some tiny homes popping up in people's back yards which are looking quite nice. However, I also have a landlord across from me who kicked out long-time good tenants under the guise of moving in himself (which he didn't do) while he renovated the house and broke it into multiple rooms. Now I get to look at a row of overflowing garbage cans most days, contend with more parking issues on a busy street, and most recently there's been a fire at that house, and now someone was arrested for assaulting neighbours with one of those green laser lights. So, I am concerned with how we are densifying and I think it's important to hear all the voices before making decisions. Having people live on top of each other has some serious drawbacks and it takes away from quality of life for people who have invested in these neighborhoods for a long time when they weren't perhaps the most popular or the most convenient (but what was affordable at the time). On top of that, none of what is being built on the peninsula appears to be affordable. I couldn't afford to rent where I am now!</p> <p>All of this to say, there needs to be more opportunity for people currently living in these areas to have a voice and be made aware of when these proposed changes are going to be discussed. As I said, I'm usually pretty good at keeping up with what's going on around me, but this one seems to have totally zoomed right on by.</p> <p>Thanks for your ear. [redacted]</p>

	<p>Hello [redacted],</p> <p>Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be anonymized and used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.</p> <p>For some additional context, <u>in August 2024, the province announced 12 new minimum planning requirements regulations</u>. The municipality is legally required to update land use bylaws and plans to meet these requirements. While the minimum planning requirements affect <u>some specific regulations</u>, they do not change the permitted uses (types of dwellings) or density (number of units) set out in the land use by-law zones. Please let us know if you have any questions about the minimum planning requirements and what the proposed changes mean for your neighbourhood.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR102	<p>The public website is very complex and I understand the public comments are likely to have little or no effect on the changes. However, in general I would just like to record my opinion that a few of the changes will have detrimental effects on neighborhoods and especially children and young people that live in them. Particularly the changes that introduce high rise apartment buildings to single family neighborhoods that won't have to have parking or commercial services that would benefit residents included will have negative effects on the existing neighborhoods. Traffic and parking will make playing outside for children more difficult and potentially dangerous from traffic and parked cars.</p> <p>I think you need to be thinking about the recreation facilities and schools and green space you need to include with all these high density developments.</p> <p>We are trusting you in the planning department and municipal government to make decisions that will keep the character of existing neighborhoods and keep them safe for the children that live there.</p> <p>[Redacted]</p> <hr/> <p>Hello [redacted],</p> <p>Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.</p>

	<p>For some additional context, in August 2024, the province announced 12 new minimum planning requirements regulations. The municipality is legally required to update land use bylaws and plans to meet these requirements. While the minimum planning requirements affect some specific regulations (https://www.shapeyourcityhalifax.ca/minimum-planning/news_feed/minimum-planning-requirements-summary), they do not change the permitted uses (types of dwellings) or density (number of units) set out in the land use by-law zones.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR103	<p>Dear Councilors:</p> <p>The Liveable Halifax Coalition is an alliance of communities and citizens who actively support smart development and densification in HRM. We all recognize that our city is in dire need of affordable housing and I consider this to be a top priority. However, the disorganized approach to densification we now are witnessing is of great concern. Basic checks and balances to ensure the quality of our urban environment have been erased from planning reviews and there has been a negative impact on:</p> <ul style="list-style-type: none"> City services traffic parking Heritage preservation Green space <p>Of greatest importance is that the new zoning bylaws do not increase levels of affordable housing. Relying on a "trickle-down" effect is not a well-grounded planning strategy to ensure that people have the homes that they need at a price that they can afford.</p> <p>The changes that these bylaws allow will be irreversible. Before our city is irreversibly damaged, we ask that you put in place specific risk management strategies to:</p> <ul style="list-style-type: none"> -mitigate potential harms arising from developments -mandate real consultation with existing communities before developments are approved -address infrastructure pressures -ensure public safety with updated evacuation routes <p>We are fortunate to live in this beautiful city and we are asking for a thoughtful, well considered, consultative approach to addressing densification and most importantly, affordable housing.</p> <p>We ask that zoning bylaws mandate a three month period of active community engagement before the approval of any development.</p> <p>Thank you for your consideration of this urgent request.</p> <p>Yours sincerely,</p>

	<p>[redacted]</p> <hr/> <p>Hello [redacted],</p> <p>Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be anonymized and used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.</p> <p>For some additional context, <u>in August 2024, the province announced 12 new minimum planning requirements regulations</u>. The municipality is legally required to update land use bylaws and plans to meet these requirements. While the minimum planning requirements affect <u>some specific regulations</u>, they do not change the permitted uses (types of dwellings) or density (number of units) set out in the land use by-law zones.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR104	<p>Dear Jacqueline Hamilton</p> <p>I am writing to formally express my concerns regarding the recent trend of multi-unit residential developments being approved in areas that have traditionally been designated for single-family homes.</p> <p>As a resident of Quinpool Road Area I strongly believe that these projects are not in line with the character and intent of our community, and I urge you to reconsider allowing such developments in strictly residential areas.</p> <p>The introduction of high-density housing in established neighborhoods raises several concerns, including:</p> <ol style="list-style-type: none"> 1. Increased Traffic and Parking Issues – Single-family neighborhoods are not designed to accommodate the additional traffic and parking demands that multi-unit buildings bring. This leads to congestion, safety hazards, and difficulty for current residents to park near their homes. 2. Strain on Infrastructure and Public Services – Water, sewage, roads, and emergency services are designed based on the expected density of single-family homes. A sudden increase in population due to multi-unit buildings could overwhelm these services, leading to decreased quality and higher costs for taxpayers. 3. Disruption of Neighborhood Character – Many residents chose to live in these areas because of the quiet, spacious, and family-friendly environment. Large, high-density buildings can disrupt the aesthetic and ambiance of the community, negatively affecting property values and overall livability.

	<p>4. Environmental Impact – The removal of green spaces and trees to accommodate large buildings contributes to increased heat, reduced air quality, and loss of natural habitats for local wildlife.</p> <p>While I understand the need for diverse housing options, I believe that such developments should be strategically placed in areas that can support them without negatively impacting established neighborhoods.</p> <p>I urge you to enforce zoning regulations that protect residential communities from incompatible high-density construction.</p> <p>I appreciate your time and consideration of this matter, and I look forward to your response. Please let me know if there are any public meetings or opportunities for residents to voice their concerns.</p> <p>Sincerely, [redacted]</p> <hr/> <p>Hello [redacted],</p> <p>Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We’ve recorded your comments, and they will be used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.</p> <p>For some additional context, in August 2024, the province announced 12 new minimum planning requirements regulations. The municipality is legally required to update land use bylaws and plans to meet these requirements. While the minimum planning requirements affect some specific regulations, they do not change the permitted uses (types of dwellings) or density (number of units) set out in the land use by-law zones. The zoning changes identified in your email were previously made as part of the Urgent Changes to Planning Documents for Housing and were adopted by Regional Council in May 2024.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR105	<p>Dear Esteemed Government Officials</p> <p>As a long-term resident of Halifax-Citadel (Dalhousie Neighbourhood) I have significant concerns with respect to the proposed zoning changes for our city.</p>

Like many others, I recognize that our city is in dire need of affordable housing, but the current approach to densification we are now witnessing is alarming. Many of the basic considerations to ensure the quality of our urban environment appear to have been erased from planning reviews.

We can already see how this face-paced development has negatively impacted traffic (and traffic accidents), parking, city services, green spaces, noise pollution and heritage preservation; meanwhile doing little to ensure more affordable housing. Historic streetscapes are being razed to build apartment towers with rents well over \$2000/month. While the proposed allowance of up to ten(!) bedrooms per unit may ease some of the affordable housing deficit, the fear is that this will result in purchases of (undesignated) heritage homes by slum landlords and pockets of student ghettos in the Dalhousie neighbourhood similar to those seen in cities like Montreal, with "party neighbourhoods" causing disturbances such have been seen in the past on Jennings Street.

The changes these bylaws allow will be irreversible. Before our city is damaged beyond repair, we ask that you put in place specific risk-management strategies to

- mitigate potential harms arising from developments;
- mandate real consultation with existing communities before developments are approved;
- address infrastructure weaknesses;
- ensure public safety with updated evacuation routes; and
- align projects with current strategies such as the Integrated Mobility Plan and the Environmental Protection Plan.

Clearly even HRM council has concerns about these changes could do to the city. People are already angry at the traffic, infrastructure demands and loss of character in the city. That's why Council has asked the Province for legal protection from potential citizen claims of "constructive taking and de facto expropriation of private property" by allowing such rapid and unchecked development in HRM as a result of the Provincial Regulations.

I support the request of other concerned residents that zoning bylaws mandate a three-month period of active community engagement and involvement before the approval of any development project, and ask Council to withdraw this request for legal protection by the Province.

Thank you for your consideration.

Sincerely,

[redacted]

Hello [redacted],

	<p>Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.</p> <p>For some additional context, in August 2024, the province announced 12 new minimum planning requirements regulations. The municipality is legally required to update land use bylaws and plans to meet these requirements. While the minimum planning requirements affect some specific regulations, they do not change the permitted uses (types of dwellings) or density (number of units) set out in the land use by-law zones.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR106	<p>Good afternoon,</p> <p>Due to a lack of trust in the system we are seeing today, I have bcc'd others to ensure that my response is heard.</p> <p>This "Minimum Planning changes in Halifax" policy has several problematic aspects, both in its framing and in its potential consequences. Here are my key concerns:</p> <p>This isn't the Nova Scotia I support</p> <p>I moved to Nova Scotia from Ontario 20 years ago to do my PhD at Dalhousie — I stayed to escape the kind of unchecked, reckless development that was overtaking Ontario, endless construction, disappearing green spaces, overburdened infrastructure, and a decline in overall quality of life. I built my life and business here because I believed Nova Scotia was different. I wanted my family to grow up in a place that values smart planning, innovation and sustainability, community, and high quality living.</p> <p>But if this is the direction Nova Scotia is heading, what are we staying for?</p> <p>This Minimum Planning Requirement is not a solution to the housing crisis—it's a blueprint for short-term, high-speed, developer-driven expansion that will leave municipalities, businesses, and families struggling with the consequences—further degrading the high quality of life that we once enjoyed.</p> <p>Sincerely,</p>

	<p>[redacted]</p> <hr/> <p>Hello [redacted],</p> <p>Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.</p> <p>For some additional context, <u>in August 2024, the province announced 12 new minimum planning requirements regulations</u>. The municipality is legally required to update land use bylaws and plans to meet these requirements. While the minimum planning requirements affect <u>some specific regulations</u>, they do not change the permitted uses (types of dwellings) or density (number of units) set out in the land use by-law zones.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR107*	<p><i>*Includes 3 Attachments.</i></p> <hr/> <p>Good afternoon:</p> <p>As identified in the Shape Your City Website, a public engagement session will run until today, to notify residents of the land use planning. Many have written in concerns regarding these 12 proposed changes as outlined here</p> <p>In addition to individual emails, please accept this petition taken as of 4 pm today with signatures and comments relating to these concerns. The petition can be found at the following link:</p> <p>https://chnng.it/ttHGwQPbPH</p> <p>In brief, the group is asking the city to put in place risk mitigation strategies to:</p> <ul style="list-style-type: none"> o mitigate potential harms arising from developments; o mandate real consultation with existing communities before developments are approved; o address infrastructure pressures; o ensure public safety with updated evacuation routes; and o align projects with current strategies such as the Integrated Mobility Plan and the Environmental Protection Plan.

	<p>Finally, those signing request that zoning bylaws mandate a three-month period of active community engagement and involvement before the approval of any development project. We also ask Council to withdraw the request for legal protection by the Province.</p> <p>As citizens we look forward to working with Council on addressing these matters.</p> <p>Sincerely</p> <p>[redacted]</p> <p>Please note additional names have been added since I downloaded it at 4. Who should I send an updated list too at the end of the week?</p> <hr/> <p>Hello [redacted],</p> <p>Thank you for your email, the attachments will be included in the report to Regional Council this spring. After the engagement close date of Feb 24, staff cannot accept additional submissions. Please send any correspondence dated after Feb 24 to the clerk's office (clerks@halifax.ca), who will circulate it to Regional Council.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR108	<p>Dear Mayor Fillmore and Council,</p> <p>I am writing to express my opposition to the Halifax Regional Municipality (HRM) proposed amendments to the Minimum Planning Requirements. Housing is an urgent need and responsibility borne by municipal and provincial coffers. However, it is imperative that we do not prioritize housing over prudent decision-making that encompasses a comprehensive perspective on the quality of life.</p> <p>These proposed amendments are intended to expedite residential development. Nevertheless, it is crucial that we ensure that they do not compromise responsible community-driven planning, particularly the type of planning we aspire to see for Dartmouth Cove.</p> <p>Reducing the role of council and public input in mayoral planning decisions undermines transparency and disrespects by-laws enacted for public protection.</p> <p>While streamlining processes can yield benefits, it is paramount that Halifax's growth remains transparent, democratic, and community-centric.</p>

	<p>Halifax deserves thoughtful, inclusive planning, not unilateral decision-making. If you require more information or have questions please reach out.</p> <p>Sincerely,</p> <p>[redacted]</p> <hr/> <p>Hello [redacted],</p> <p>Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.</p> <p>All the best, TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR109*	<p>*Includes Attachment.</p> <hr/> <p>February 24, 2025</p> <p>Mayor, Council and Staff Halifax Regional Municipality 1841 Argyle Street Halifax, NS B3J 3A5</p> <p>Dear Mayor, Council and Staff:</p> <p>Re: Response to Minimum Planning Requirements Regulations</p> <p>We are writing in response to the above noted matter. We are concerned that the Province has summarily imposed these Regulations on HRM and its constituents without prior public consultation. This occurred while HRM is developing a new Regional Plan. In so doing, the Province upended essential elements of its own minimum planning principles of public participation and information gathering. The vast majority of HRM constituents are unaware of the sudden imposition of these Regulations and the impact it will have on their communities.</p> <p>Further, the Province has ignored HRM's unique legal status as set out in the Preamble to the Halifax Regional Municipality Charter:</p>

AND WHEREAS the Province of Nova Scotia recognizes that the Halifax Regional Municipality has legislative authority and responsibility with respect to matters dealt with in this Act;

AND WHEREAS the Halifax Regional Municipality is a responsible order of government accountable to the people...

HRM is recognized as a separate order of government unique amongst NS municipalities and has the legislative authority and responsibility for such matters as municipal planning. The Regulations are an overreach by the Province.

Notwithstanding, the Regulations were made effective by the Province in August 2024 during the municipal election when it would be challenging for the former Council and staff to fully consider them or provide any opportunity for prior public notice or input. Even with the short extension the Province recently granted at HRM's request, there is not enough time to adequately determine if and how the Regulations can be actioned or afforded by HRM.

The Regulations require HRM to make a series of significant Municipal Planning Strategy amendments including declaring that "...the most urgent priority in municipal land-use planning, regulation and development approval is to rapidly increase the supply of housing in the municipality" [section 4A (2)(a)]. Sudden legislative change of lasting impact for HRM without adequate and meaningful public awareness and consultation is contrary to effective budgeting and planning for the increased demands on municipal infrastructure and services as outlined in the Liveable Halifax Coalition Petition which we support and as further described below.

Council is encouraged to push back against this unfunded Provincial regulatory mandate. We are unaware of any new Provincial funding to support the rapid increase in housing supply demanded by the Regulations. HRM taxpayers will be left to solely support the expansion and repair of municipal infrastructure and services already under resourced to meet an additional housing surge. The Halifax Water Commission alone has experienced recent boil water advisories, water main breaks, water supply conservation measures, incomplete capital project schedules, water treatment plant replacement plan and an accumulated deficit of \$41 M because of capacity issues. Calgary and Atlanta are other recent examples of how rapid urban growth can cause a water supply and demand imbalance that worsens as cities grow without sufficient time in which to plan. An adequate supply of water for drinking and firefighting is not a given, nor an infinite resource.

The dictates of the Provincial Regulations fail to address other municipal funding shortfalls caused by rapidly increasing the supply of housing in HRM including: wastewater treatment; storm water management; firefighting, police and emergency management infrastructure and trained personnel; road and sidewalk expansion and maintenance; public transit; recreation facilities; solid waste management, etc. These additional capital and operating costs will fall to HRM taxpayers yet again.

	<p>Nor should it be necessary for Council to seek legal immunity from future claims of constructive taking/de facto expropriation of private property because of the Provincial Regulations. The October 1, 2024 motion of Council that the “...Mayor send a letter to the Province of Nova Scotia requesting amendments to the HRM Charter to include immunity from constructive taking/de facto expropriation claims” is troubling and should be repealed. If a letter has already been sent to the Province, then a motion passed that the initial request be withdrawn along with the Provincial Regulations. HRM must be given sufficient time to complete the drafting and public consultation process for the new Regional Plan before more legislative changes are considered. Council and staff and their constituents must first assess what HRM’s future growth objectives and costs are, particularly given CMHC’s February report projecting a 2.5% vacancy rate (up from 1% in 2023) as immigration levels decrease, and new housing stock nearing completion is added. Additional time will also enable the Province to expand its affordable housing offerings and local universities and colleges to undertake much needed student housing initiatives.</p> <p>Thank you for your consideration of this submission. We look forward to being notified of opportunities for an expanded discussion about housing.</p> <p>[redacted]</p> <hr/> <p>Hello [redacted],</p> <p>Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We’ve recorded your comments, and they will be used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR110	<p>Hello,</p> <p>I am writing to provide feedback on the minimum planning changes. Halifax is becoming an unrecognizable city full of ugly and overly priced apartment buildings. Please stop pandering to landlords and developers and make a plan that actually supports the people of Nova Scotia. Greed has taken over this province and it isn’t a good look.</p> <p>Warm regards, [redacted]</p> <hr/> <p>Hello [redacted],</p>

	<p>Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR111	<p>Hi,</p> <p>Want to add my two cents.</p> <p>I don't want to see anyone unhoused, and believe everyone should have access to safe, secure affordable housing. At the same time, I worry that a rushed approach to solving this problem will lead to future problems - such as overcrowding, increased traffic, loss of forests and wild spaces, and many other things that make Nova Scotia so special.</p> <p>I don't believe our conservative government has the right priorities, and I they're rushing to try fix a very complex problem with our proper planning.</p> <p>Please prioritize planning, quality of life, and the environment when approaching planning in Halifax, as it's such a special place.</p> <p>Thank you, [redacted]</p> <hr/> <p>Hello [redacted],</p> <p>Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>

<p>MPR112</p>	<p>I believe that many of the twelve adjustments the Provincial Government insists HRM include within its planning process will result in a city that is not well-planned, that is thrown together hastily. And this will have been done, not to create affordable housing, but mainly to generate profit for the developers. Developers who don't care what our city looks like, who have zero regard for the inhabitants of the cheap structures they are throwing together, but whose only interest is making as much money as possible. Why do we want to enable them to do that? It makes no sense.</p> <p>Great cities are well-thought out spaces where people's needs are anticipated and met, places where people can thrive and themselves prosper. Not just a few developers.</p> <p>[redacted]</p> <hr/> <p>Hello [redacted],</p> <p>Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
<p>MPR113</p>	<p>Hello,</p> <p>I am writing to give feedback on the proposed amendments to the Halifax Charter's minimum planning requirements. I support the majority of the proposed amendments, however, I have concerns about items H and E.</p> <p>(h) for residential buildings that begin construction before April 1, 2027, provide that no requirement related to unit mix applies;</p> <p>I take issue with removing unit mixture requirements because, in the long run, this will lead to problems with affordability and livability. It is necessary to have a mixture of unit types in order to accommodate different renters' needs, and taking away the unit mix requirements will lead to a surge in one-bedroom apartments. One-bedroom units tend to cost more in rent per person compared to larger units that can be split between multiple roommates. Additionally, one-bedroom units don't accommodate families, and fewer multi-bedroom units make the few multi-unit bedrooms much more challenging and expensive to find. This dramatically impacts young people, students, people who cannot live alone for accessibility reasons, and families. One-bedroom units are a way for developers to increase unit counts and development</p>

	<p>feasibility, which helps increase the number of units built. But if we are focusing on people housed and not units built, then keeping unit mixes is essential.</p> <p>(e) provide for the adoption of a secondary municipal planning strategy and the implementation of a land-use by-law for the area of the Municipality identified as the suburban area on the map attached as Appendix A, or a substantially similar area, no later than January 31, 2025;</p> <p>I understand the municipality is experiencing a lot of heat due to the Suburban Plan timeline. However, I believe it is justified, given that there still seems to be no end date in sight. Currently, almost all development in suburban areas is halted because of this, and given the current need for housing, this is an issue. It has been nearly two years since HRM announced the new suburban plan, so there should be more than just a work plan ready by this spring. If HRM does not have the capacity to see the project through, then they should be looking for ways to outsource the work because, as a member of the public looking at this project, the current timeline does not add up. I understand that HAF took a lot of staff focus away from the project; however, after two years and a dedicated team, there should be more to show to the public by now.</p> <p>Thank you for your time and understanding. I look forward to hearing what comes from this engagement process.</p> <p>Kindly, [redacted]</p> <hr/> <p>Hello [redacted],</p> <p>Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR114	<p>Dear Mr Mayor</p> <p>I am writing to ask you to reconsider these amendments. I realize you are only one voice but perhaps you and some of the new councillors can see the problems with this money grab.</p> <p>There is no plan. It simply allows developers to do as they wish and will only result in more unaffordable apartments, more traffic, parking problems , more vacant lots , strains on our schools, hospitals and wastewater systems etc - and to what end?</p>

	<p>If we want more densification let’s start by developing our infrastructure, improving transit, and building affordable housing. Let’s learn from planned neighbourhoods and best architecture in other cities.</p> <p>We must be grow and accommodate more people but not using policies from the Federal government that have no sense of local context.</p> <p>[redacted]</p> <hr/> <p>Hello [redacted],</p> <p>Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We’ve recorded your comments, and they will be used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.</p> <p>For some additional context, <u>in August 2024, the province announced 12 new minimum planning requirements regulations</u>. The municipality is legally required to update land use bylaws and plans to meet these requirements. While the minimum planning requirements affect <u>some specific regulations</u>, they do not change the permitted uses (types of dwellings) or density (number of units) set out in the land use by-law zones. The zoning changes identified in your email were previously made as part of the <u>Urgent Changes to Planning Documents for Housing</u> associated with the Federal Housing Accelerator Fund, and were adopted by Regional Council in May 2024.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR115	<p>Good evening,</p> <p>I am writing to formally express my concerns regarding the proposed changes to the zoning on the Halifax peninsula from ER-2 to ER-3 . While I am in support of smart development and densification in HRM and recognize that our city is in dire need of affordable housing, the current approach to densification is concerning.</p> <p>I have been a resident of District 9 in the same house on Deacon Street for the past 24 years. There no longer appears to be basic checks and balances in place to ensure the quality of our future urban environment. Multi-unit residential developments are being approved in areas that have traditionally been designated for single-family homes. I do not see anything in the new zoning bylaws to promote increased levels of affordable housing. Relying on a ‘trickle-down effect’ is not a well-grounded planning strategy to ensure that people have the homes they need at a price they can afford. The changes these bylaws allow will be irreversible.</p>

I strongly believe that proposed bylaw changes are not in line with the character and intent of our community. The introduction of high-density housing in established neighborhoods raises several concerns, including:

1. **Increased Traffic and Parking Issues** – Single-family neighborhoods are not designed to accommodate the additional traffic and parking demands that multi-unit buildings bring. This leads to congestion, safety hazards, and difficulty for current residents to park near their homes.
2. **Strain on Infrastructure and Public Services** – Water, sewage, roads, and emergency services are designed based on the expected density of single-family homes. A sudden increase in population due to multi-unit buildings could overwhelm these services, leading to decreased quality and higher costs for taxpayers. We are currently experiencing further reduced water pressure in our area where water pressures were already below the stated Halifax Water minimum prior to recent developments.
3. **Disruption of Neighborhood Character** – Many residents chose to live in these areas because of the quiet, spacious, and family-friendly environment. Large, high-density buildings can disrupt the aesthetic and ambiance of the community, negatively affecting property values and overall livability.
4. **Environmental Impact** – The removal of green spaces and trees to accommodate large buildings contributes to increased heat, reduced air quality, and loss of natural habitats for local wildlife.

Before our city is damaged beyond repair, I ask that you put in place specific risk-management strategies to

- mitigate potential harms arising from developments,
- mandate real consultation with existing communities before developments are approved,
- address infrastructure pressures,
- ensure public safety with updated evacuation routes, and
- align projects with current strategies such as the Integrated Mobility Plan and the Environmental Protection Plan.

I urge the HRM Planning Department to enforce zoning regulations that protect residential communities from incompatible high-density construction.

I appreciate your time and consideration of this matter, and I look forward to your response. Please let me know if there are any public meetings or opportunities for residents to voice their concerns.

Sincerely,
[redacted]

Hello [redacted],

	<p>Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.</p> <p>For some additional context, <u>in August 2024, the province announced 12 new minimum planning requirements regulations</u>. The municipality is legally required to update land use bylaws and plans to meet these requirements. While the minimum planning requirements affect <u>some specific regulations</u>, they do not change the permitted uses (types of dwellings) or density (number of units) set out in the land use by-law zones. The ER-3 zoning changes identified in your email were previously made as part of the <u><i>Urgent Changes to Planning Documents for Housing</i></u> and were adopted by Regional Council in May 2024.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR116	<p>Project Timeline</p> <ul style="list-style-type: none"> • August 2024 Minimum Planning changes in Halifax has finished this stage Province of Nova Scotia announces new Minimum Planning Requirements • October 2024 Minimum Planning changes in Halifax has finished this stage Regional Council directs staff to bring the Minimum Planning Requirements changes forward as part of the Regional Plan Review • October - December 2024 Minimum Planning changes in Halifax has finished this stage Staff completed a technical review of the Minimum Planning Requirements alongside the existing planning framework to determine how to best address the changes required • January 24 - February 24, 2025 Minimum Planning changes in Halifax is currently at this stage 30-Day Public Engagement Period • Spring 2025 this is an upcoming stage for Minimum Planning changes in Halifax Council review and approval (includes public hearing); Provincial approval. <p>I am posting the above schedule here because I find the time line of these most consequential decision for our city and HRM being rammed through in a big hurry. I find that one month to respond to this very important question for HRM and our province is insufficient. If I did not hear about this response opportunity from a community group that I am a part of I would not have responded. I am not sure how residents hear about these response opportunities but there must be a better way to communicate.</p>

These changes may be a reaction to an immigration policy that could change at any moment. Also, we know the rural population in Nova Scotia has moved in greater numbers than in past years to the urban areas of our province. Many years of careful planning have taken place in HRM. Most of these suggested changes in this minimum planning approach are short sighted and will not enhance the quality of life for HRM citizens. These changes do not foster healthy and vibrant communities, and are not considerate of the present environment we live in.

I have been wondering with some of this push to get things done and build more housing are we in a position to actually build proper housing? We have all been aware for several years that we do not have enough skilled workers to do this building. In support of this effort to create more housing, the Provincial Government needs to support the preparation of skilled workers in all of the trades. The government must increase the support and funding to create more spaces in our Community Colleges. We have excellent schools in this province but the waiting lists for young people to enter their chosen trade is sometimes 2 to 3 years. The government must give more support to these schools so we can have Nova Scotians building the housing we need.

The other point I want to make is that in HRM and also, in many other parts of our province the current infrastructure of sewage and water and other supports to allow this increase in housing is not sufficient. Will this be safe and sustainable for the future?

There is clearly a need for housing, and having affordable housing is critical. These 12 adjustments do not focus on affordability. In the past few decades HRM has taken planning seriously. Our municipality and provincial government should take pride in creating a well planned city and rural/suburban area. These 12 changes threaten all of the good work that has gone on before.

Destruction of wetlands, such as Eisnor Cove, must not be permitted and care must be taken to leave water retention ponds alone so existing neighbourhoods don't get flooded, as sacrifices for developer profits.

If this 'Minimum Rules Plan' is allowed to proceed, we will end up with a municipality with areas of total inconsistency. Existing neighbourhoods may be negatively impacted by developers snatching up parcels of land and creating housing that does not fit the existing requirements.

For the provincial government and HRM to help with the housing shortage, they should engage with those organizations which already deal with 'affordable housing' such as Dartmouth Non-Profit Housing and other organizations that have knowledge and insight about affordable housing.

In conclusion, great cities are well thought out and planned spaces. They take into consideration the living, working, recreational, educational, health and

	<p>transit/infrastructure needs of the residents. These changes DO NOT support HRM in how to proceed with future development.</p> <p>Regards, [redacted]</p> <hr/> <p>Hello [redacted],</p> <p>Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.</p> <p>For some additional context, <u>in August 2024, the province announced 12 new minimum planning requirements regulations</u>. The municipality is legally required to update land use bylaws and plans to meet these requirements. While the minimum planning requirements affect <u>some specific regulations</u>, they do not change the permitted uses (types of dwellings) or density (number of units) set out in the land use by-law zones.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR117*	<p><i>*Includes Attachment.</i></p> <hr/> <p>I am writing to the Mayor and City Council, in regard to current actions around Provincial minimum standards for development bylaws.</p> <p>Please direct the attached letter to Mayor Filmore, and City Council.</p> <p>I am also copying my district City Councilar, Laura White</p> <p>Please do confirm receipt of the email, in good order at your earliest convenience.</p> <p>With kind regards, [redacted]</p> <hr/> <p>Hello [redacted],</p> <p>Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.</p>

	<p>For some additional context, in <u>August 2024</u>, the province announced 12 new minimum planning requirements regulations. The municipality is legally required to update land use bylaws and plans to meet these requirements. While the minimum planning requirements affect <u>some specific regulations</u>, they do not change the permitted uses (types of dwellings) or density (number of units) set out in the land use by-law zones.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR118	<p>We are writing in response to your public engagement on the changes the province has made to the Halifax Charter's Minimum Planning Requirements. Our family lives in the south end of Halifax, near the intersection of [redacted]. While we recognize that our city is in dire need of affordable housing and we support densification, we are concerned with the sweeping changes being introduced. We lived in Toronto for 20 years, from the early 2000's to 2023, and over that period witnessed an amazing city become unlivable. Although Halifax differs from Toronto in many ways, we worry that too many changes at once will lead Halifax down a similar path.</p> <p>The very things that attracted our family to Halifax - less congestion, safety, green space, easier access to services - will be under threat with the new planning requirements, or lack thereof. Even with the development to date, long-term residents have seen negative impacts to city services, traffic, parking, heritage preservation and green space.</p> <p>We also question whether the changes will achieve their purported goal of affordable housing. Having attended meetings of the Liveable Halifax Coalition ("the Coalition"), we share their concerns that the new zoning bylaws do little to ensure increased levels of affordable housing. City streetscapes are being razed to build apartment towers with rents well over \$2000/month. Relying on a 'trickle-down effect' is not a well-grounded planning strategy to ensure that people have the homes they need at a price they can afford.</p> <p>The changes these bylaws allow will be irreversible. We support and reiterate the Coalition's ask that before our city is damaged beyond repair, you put in place specific risk-management strategies to:</p> <ul style="list-style-type: none"> • mitigate potential harms arising from developments; • mandate real consultation with existing communities before developments are approved; • address infrastructure pressures; • ensure public safety with updated evacuation routes; and • align projects with current strategies such as the Integrated Mobility Plan and the Environmental Protection Plan.

	<p>We also understand that Mr. Fillmore and many councillors have expressed nervousness about unfettered growth. Further, Council has asked the Province for legal protection from potential citizen claims of “constructive taking and de facto expropriation of private property” by allowing such rapid and unchecked development in HRM as a result of the Provincial Regulations. Council's belief that they require legal protection is confirmation that the potential negative impacts to current residents are real and significant. Citizens should have recourse.</p> <p>We support and reiterate the Coalition's asks that zoning bylaws mandate a three-month period of active community engagement and involvement before the approval of any development project, and that Council withdraw its request for legal protection by the Province.</p> <p>Sincerely, [redacted]</p> <hr/> <p>Hello [redacted],</p> <p>Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.</p> <p>For some additional context, <u>in August 2024, the province announced 12 new minimum planning requirements regulations</u>. The municipality is legally required to update land use bylaws and plans to meet these requirements. While the minimum planning requirements affect <u>some specific regulations</u>, they do not change the permitted uses (types of dwellings) or density (number of units) set out in the land use by-law zones.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR119	<p>Dear HRM Councillors:</p> <p>I am adding my name to support the position of The Liveable Halifax Coalition, which is an alliance of communities and citizens who actively support smart development and densification in HRM. We all recognize that our city is in dire need of affordable housing.</p> <p>But the unruly approach to densification we're now witnessing is concerning. Basic checks and balances, to ensure the quality of our urban environment, have been erased from planning reviews. And no wonder.</p> <p>The breakneck speed of development has already had a negative impact on</p>

- city services
- traffic
- parking
- heritage preservation
- and green space

What's worse is that the new zoning bylaws do little to ensure increased levels of affordable housing. City streetscapes are being razed to build apartment towers with rents well over \$2000/month. Relying on a 'trickle-down effect' is not a well-grounded planning strategy to ensure that people have the homes they need at a price they can afford.

The changes these bylaws allow will be irreversible. Before our city is damaged beyond repair, we ask that you put in place specific risk-management strategies to

- mitigate potential harms arising from developments;
- mandate real consultation with existing communities before developments are approved;

- address infrastructure pressures;
- ensure public safety with updated evacuation routes; and
- align projects with current strategies such as the Integrated Mobility Plan and the Environmental Protection Plan.

There's rising dissatisfaction throughout the city because people's voices aren't being heard. Their communities are being radically altered without their input.

We understand our new mayor and many councillors have expressed nervousness about unfettered growth. Further, Council has asked the Province for legal protection from potential citizen claims of "constructive taking and de facto expropriation of private property" by allowing such rapid and unchecked development in HRM as a result of the Provincial Regulations.

That's why we're asking that zoning bylaws mandate a three-month period of active community engagement and involvement before the approval of any development project. We also ask Council to withdraw this request for legal protection by the Province.

I trust you all care about preserving HRM as a desirable place to live, work and raise our families. The risk associated with the present proposal is too great and I appeal to you all to take a strong stand and protect our city from incompletely considered, rapidly approved changes.

Sincerely,
[redacted]

Hello [redacted],

Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be used to inform a report to Regional Council this spring. There will be

	<p>an additional opportunity for public comment at that time as part of the public hearing process.</p> <p>For some additional context, <u>in August 2024, the province announced 12 new minimum planning requirements regulations</u>. The municipality is legally required to update land use bylaws and plans to meet these requirements. While the minimum planning requirements affect <u>some specific regulations</u>, they do not change the permitted uses (types of dwellings) or density (number of units) set out in the land use by-law zones.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR120	<p>In regards to the minimum planning changes; heritage buildings should be protected the same as parks and military space is. Our city has lost so much history to development already. We do need better quality if living spaces, but when you remove the culture and heritage of Halifax you leave us with spaces that no one will enjoy living in. [redacted]</p> <hr/> <p>Hello [redacted],</p> <p>Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR 121	<p>Dear Mayor Fillmore and members of Council,</p> <p>I write today with respect to the proposed minimum planning changes for Halifax. I have sympathy for the position that you are in because in large the required minimums have been forced on HRM by an unthinking provincial government that is more interested in looking like it is taking action on the housing crisis, than it is in finding solutions that will actually work to solve the problem. This is on top of the made-in-Ottawa, cookie-cutter housing solutions that were foisted on HRM by the Federal government's Housing Accelerator Fund. However, I would urge you to take the back the reins from these other levels of government who have little</p>

understanding of the reality on the ground in HRM. You have been elected by the residents of HRM to do what is best for our city, not to cowtow to those who think they know better about how our city should grow. You have the support of the residents of HRM to do the right thing and stand up for our best interests.

I have the following concerns about the minimum planning standards and HRM proposed response to meeting the requirements.

Minium Requirement: b)

Require that priority be given to increasing the supply of safe, sustainable and affordable housing in the Municipality over other interests identified in the municipal planning strategy for the purposes of all processes, approvals and decisions made under the municipal planning strategy.

HRM's Response:

- New language in the Regional Plan will emphasize the importance of increasing the supply of safe, sustainable, and affordable housing
- While no immediate changes to zoning or land use regulations are proposed with this new policy, increasing the supply of new housing across the region will be an important consideration in future land use planning efforts.

My Concerns:

Simply using language in the Regional Plan that emphasises the importance of increasing the supply of affordable housing is not enough. The time for platitudes is over. The time for concrete action to increase the supply of truly affordable housing has already passed. There is no more time to spare. HRM needs to take meaningful action to increase the supply of affordable housing, particularly deeply affordable housing. Many within the Municipality will argue that this is not a Municipal responsibility, pr within the Municipality's control. Most residents have no idea about the division of responsibilities between municipal, provincial and federal levels of government, and frankly, they don't really care. Municipal government is the closest level of government affecting the daily lives of residents, and residents want to see you take action.

To those who say that there is little HRM can do with respect to deeply affordable housing, I say, that is a cop-out. Each time HRM sold a former school, like Bloomfield, St. Pat's-Alexandra, or St. Pat's High, to a private developer, over comparable bids from community organizations promising to construct affordable housing, HRM made a conscious decision to pick the interests of private developers over the interests the community and those needed affordable housing.

The fact that HRM now proposes "no immediate changes to zoning or land use regulations with this new policy," but instead simply continues to reply only on "increasing the supply of new housing across the region," shows once again that

HRM is not taking seriously the need for HRM to play a role in increasing the supply of **affordable housing** in HRM.

I also believe that HRM's response to this minimum requirement does not adequately push back against the province's requirement that HRM prioritize housing **above all else**. Everyone agrees that housing is important, but not all housing proposals are equal. Surely some consideration needs to be given to the environment and principles of good planning when making decisions on where to locate new developments.

Minimum Requirement: h)

For residential buildings that begin construction before April 1, 2027, provide that no requirement related to unit mix applies.

HRM's Response

- Until April 1, 2027, the land use by-law regulations for apartments are being changed to remove all bedroom count requirements (the amount of studio, 1-bedroom, 2-bedroom units, etc. required per apartment building),
- Adjust land use by-laws to remove the bedroom count requirements until April 1, 2027. as well as allowing up to 10 bedrooms.

My Concerns

Without mandated bedroom mixes, developers will construct units that are most financially advantageous to them, rather than ensuring that the units that are constructed meet the needs of the widest spectrum of residents, i.e. singles, couples, families, younger and older residents.

If I understand it correctly, the proposed minimum standards will also allow 8-plexes on larger urban lots. Combined with an increase in the allowable bedroom count to 10, this would allow construction of eight X ten-bedroom units on small urban sites. To my mind, 80 bedrooms on relatively small urban lots is the equivalent of green-lighting tenements.

And while I appreciate the protections afforded to heritage districts, there are many historic buildings, not in conservation districts. The proposed minimum planning standards will encourage the demolition of more of these buildings, which offer many existing affordable housing units. What we have seen taking place along Robie Street is just a hint of what is to come unless more incentives/protections are offered to ensure that historic buildings are retained, instead of demolished. Large historic buildings are ideally suited to being converted to multi-unit buildings and I believe HRM needs to do more to encourage that.

Sincerely,
[redacted]

	<p>Hello [redacted],</p> <p>Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR122	<p>This is my request for the city to reconsider development zoning and building heights: <u>zoning bylaw changes</u></p> <p>There needs to be some organic and holistic approach to all these developments. Schools? Hospitals? Green spaces? Active transport?</p> <p>All good for density, but please someone with common sense and sustainable development.</p> <p>Thanks [redacted]</p> <hr/> <p>Hello [redacted],</p> <p>Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR123	<p>Dear Halifax Regional Council members,</p> <p>I am writing to you about the Minimum Planning Requirements to address housing supply in HRM.</p>

I live in central Halifax, near multiple, large development projects. Within a 15 minute walk from my house, you will find new high rise buildings at:

- Almon St at both Gladstone St and Robie St
- North St at both Oxford St and Clifton St
- Agricola St near May St
- Robie St at Bilby St
- Windsor and Willow Streets
- Cork St and Bayers Rd

The impacts of such development in and around my neighbourhood include:

- Feeling the effects of blasting from all of these sites, yet with no notification by of the builders that such work was to start, that we should check our walls and foundations for any cracks and damage before that work began. An oversight that municipal laws have allowed, that residents are to simply tolerate and to continue to do so with continued development.
- Closed sidewalks
- Closed roads and redirected traffic

All of the above for months and years at a time (Richmond Yards, ongoing for over four years).

With the mayor's plan to develop the Young St "future growth node" so that 26,500 more residents can live there, we will surely experience four more years of disruptions to this same part of the city.

Given the development noted above, I would suggest that this part of Halifax already has a lot of mixed use buildings. Allowing my neighbours and me to add 4-8 units on each of our residential lots is lunacy, Before we all start building:

- How do we first establish that our sewer pipes can handle this?
- Where will the tenants of these units park their cars, even if only some of them have cars?
- Do all the of new units string a wire out to the pole on the street, or do we all dig up our driveways to lay wiring? The NS Power cables down my street have frayed wrapping that sizzles when it rains.
- Where will the new park go, now that we have all given up our backyards where our kids play?
- The trees and shrubs I planted will have to come out to make room and there are a lot of birds that live there, including some neighbourhood cardinals.
- Is EMO involved with these project plans so that they can update the emergency plans to evacuate many more peninsula residents?
- Can I charge what I want for the tenants of the new units? Can I go for the same profit margins that Killam Properties is getting?

	<p>HRM can do better than this plan, and must do better. All levels of government must cooperate and make sure that residents are not saddled with desperate measures. No thanks to ER-3 zoning.</p> <p>Sincerely, [redacted]</p> <hr/> <p>Hello [redacted],</p> <p>Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.</p> <p>For some additional context, <u>in August 2024, the province announced 12 new minimum planning requirements regulations</u>. The municipality is legally required to update land use bylaws and plans to meet these requirements. While the minimum planning requirements affect <u>some specific regulations</u>, they do not change the permitted uses (types of dwellings) or density (number of units) set out in the land use by-law zones. The ER-3 zoning changes identified in your email were previously made as part of the <u><i>Urgent Changes to Planning Documents for Housing</i></u> and were adopted by Regional Council in May 2024.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR124*	<p><i>*Includes Attachment.</i></p> <hr/> <p>Hello Anne and Team,</p> <p>Please see the attached feedback regarding the proposed Minimum Planning Changes. We feel a discussion and further information on detailed planning changes proposed would be beneficial when availability permits.</p> <p>Kind regards, [redacted]</p> <hr/> <p>Hello [redacted],</p> <p>Thank you and Clayton Developments for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be used to inform a report to Regional Council this spring.</p>

	<p>One of our team members will be in touch to set up a time to discuss.</p> <p>Kind regards, Telina</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR125	<p>Hello!</p> <p>I just received this reminder of the deadline to submit my thoughts about possible changes to our planning and bylaws.</p> <p>First, please DO NOT give the mayor stronger powers. Remember not all residents voted for the present mayor. We did, however, elect councillors who we expect to speak on our behalf. It's the democratic way. Also when it comes to problems in our particular area (I live in Downtown Dartmouth) we want our councillor to be there to present our concerns to the city council. We don't want a mayor who could possibly have no interest in our concerns.</p> <p>There are a couple of items in the new recommendations for the regional planning to which I will comment. 1) I disagree with the idea of converted shipping containers being used for residential dwellings or backyard suites. Here in Downtown Dartmouth we are being inundated with highrises as you know. They are unsightly and causing traffic problems already.</p> <p>2) The new requirement says no need for on-site parking. I disagree here as well. We have parking issues in the winter for snow clearing. People need to have a space to park their car/s. Also aesthetically they open spaces making the area seem less dense and allowing for fewer wind tunnels.</p> <p>Hoping you will take my thoughts into consideration.</p> <p>With thanks, [redacted]</p> <hr/> <p>Hello [redacted],</p> <p>Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.</p> <p>I'll add that as the province sets out mayoral powers, you may instead wish to share any comments about mayoral powers with your provincial MLA.</p>

	<p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR126*	<p><i>*Includes Attachment.</i></p> <hr/> <p>Dear Clerks,</p> <p>Kindly pass along the attached letter to Mayor Fillmore.</p> <p>Thank you.</p> <p>Best regards,</p> <p>[redacted]</p> <hr/> <p>Hello [redacted],</p> <p>Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.</p> <p>For some additional context, in August 2024, the province announced 12 new minimum planning requirements regulations. The municipality is legally required to update land use bylaws and plans to meet these requirements. While the minimum planning requirements affect some specific regulations, they do not change the permitted uses (types of dwellings) or density (number of units) set out in the land use by-law zones.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR127	<p>Dear City Planners,</p> <p>I am writing to formally express my concerns regarding the recent trend of multi-unit residential developments being approved in areas that have traditionally been designated for single-family homes.</p> <p>As a resident of Deacon Street in Northland Halifax, I strongly believe that these projects are not in line with the character and intent of our community, and I urge the</p>

[City Council/Planning Department] to reconsider allowing such developments in strictly residential areas.

The introduction of high-density housing in established neighbourhoods has already raised several concerns in my neighbourhood, including:

1. **Increased Traffic and Parking Issues** – Single-family neighbourhoods are not designed to accommodate the additional traffic and parking demands that multi-unit buildings bring. This leads to congestion, safety hazards, and difficulty for current residents to park near their homes.
2. **Strain on Infrastructure and Public Services** – Water, sewage, roads, and emergency services are designed based on the expected density of single-family homes. A sudden increase in population due to multi-unit buildings could overwhelm these services, leading to decreased quality and higher costs for taxpayers.
3. **Disruption of Neighbourhood Character** – Many residents chose to live in these areas because of the quiet, spacious, and family-friendly environment. Large, high-density buildings can disrupt the aesthetic and ambiance of the community, negatively affecting property values and overall livability.
4. **Environmental Impact** – The removal of green spaces and trees to accommodate large buildings contributes to increased heat, reduced air quality, and loss of natural habitats for local wildlife.

While I understand the need for diverse housing options, I believe that such developments should be strategically placed in areas that can support them without negatively impacting established neighbourhoods.

I urge the City Council to mandate a three-month period of active community engagement and involvement for zoning by-laws and enforce zoning regulations that protect residential communities from incompatible high-density construction.

I appreciate your time and consideration of this matter, and I look forward to your response. Please let me know if there are any public meetings or opportunities for residents to voice their concerns.

Sincerely,
[redacted]

Hello,

Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be anonymized and used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.

For some additional context, [in August 2024, the province announced](#) 12 new minimum planning requirements regulations. The municipality is legally required to update land use bylaws and plans to meet these requirements. While the minimum

	<p>planning requirements affect <u>some specific regulations</u>, they do not change the permitted uses (types of dwellings) or density (number of units) set out in the land use by-law zones. The zoning changes mentioned in your email were previously made as part of the <u><i>Urgent Changes to Planning Documents for Housing</i></u> and were adopted by Regional Council in May 2024.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR128	<p>Hi there,</p> <p>I'd like to weigh in on the regional plan.</p> <p>In item b) you talk about affordable housing. Affordable to whom? Will there be units for poverty-stricken Haligonians that are available on a sliding scale based on their income? Or is it that 80% of market value that is out of reach for a lot of people living here? I recommend that you set aside a non-negotiable number of these apartments per building, that can't be slimed out of by paying HRM some fees.</p> <p>In cii) you talk about not building on environmental sites. But the province approved the build on Eisner Cove wetlands, to start with, and then the developer did not respect the 80m buffer around wetlands. So please ensure that this DOESNT occur again, and that you enforce buffers and other factors that protect the environment. There was no consultation with Indigenous peoples either, which is criminal. You MUST obey the treaties, and work towards reconciliation. In fact, you arrested a L'nu grandmother who was enacting her treaty rights, in this case (big mistake, don't screw with treaty rights).</p> <p>About g), want to ensure that all high rises are tremor/earthquake proof, given that we are going to start FRACKING in this province, which has been proven again and again to cause earthquakes. So if a mass timber build doesn't have earthquake proofing, it should not be built, regardless of the need for housing. We want SAFE housing as mentioned earlier.</p> <p>About l), this is ridiculous. You must provide parking for these units. We are already filled to capacity with street parking, and in Halifax we have parking bans every week and more in the winter. Where do these people park? Parking is absolutely required, and it's short sighted to do this; you are creating long term problems. The developers will continue to build parking into their high rises and it won't deter them from building. Don't give too much away, you are stealing from Peter to pay Paul. No no no no no to this one.</p> <p>K) this looks a lot like the company store. I disagree with this. No company should have jurisdiction over someone's place of residence (look what is happening to agricultural workers, they are being housed in horrible conditions and fully exploited by their employers). Also, temporary homes don't have the same requirements as</p>

	<p>permanent housing so if you're gonna do this, you must ensure full compliance with safety code for permanent structures as people are going to live there! Also have a maximum period by which those temp structures must be taken down, so they don't become permanent housing.</p> <p>Overall, I want safe, dignified, accessible and truly affordable housing for those living in poverty, who are being taken advantage of by unscrupulous landlords. Please don't make the problem bigger by making short-sighted decisions like this.</p> <p>While I appreciate the ability to provide input, I question how effective this will be, based on my experience with giving input to the city. Hope you actually listen.</p> <p>Sincerely, [redacted]</p> <hr/> <p>Hello [redacted],</p> <p>Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be anonymized and used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR129	<p>To whom it may concern,</p> <p>With regards to the new minium land use proposal for Halifax we would like to express our concerns related to the proposed changing of restrictions. These changes leading to a large increase in density will result in huge demands on aging infastructure. Also changes such as and allowing up to 8 units on a single residential lot will destroy the fabric and culture of penisular neighborhoods (many of which have been in existance for well over 100 years).</p> <p>We are concerned about these changes and the impact on peninsular Halifax and our neighborhood!</p> <p>Sincerely [redacted]</p> <hr/> <p>Hello [redacted],</p>

	<p>Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.</p> <p>For some additional context, <u>in August 2024, the province announced 12 new minimum planning requirements regulations</u>. The municipality is legally required to update land use bylaws and plans to meet these requirements. While the minimum planning requirements affect <u>some specific regulations</u>, they do not change the permitted uses (types of dwellings) or density (number of units) set out in the land use by-law zones. The zoning changes identified in your email were previously made as part of the <u><i>Urgent Changes to Planning Documents for Housing</i></u> and were adopted by Regional Council in May 2024.</p> <p>All the best,</p> <p>TELINA DEBLY MCIP, LPP PLANNER II REGIONAL PLANNING PLANNING & DEVELOPMENT</p>
MPR130	<p>Dear Council,</p> <p>The Liveable Halifax Coalition is an alliance of communities and citizens who actively support smart development and densification in HRM. We all recognize that our city is in dire need of affordable housing.</p> <p>But the unruly approach to densification we're now witnessing is concerning. Basic checks and balances, to ensure the quality of our urban environment, have been erased from planning reviews. And no wonder.</p> <p>The breakneck speed of development has already had a negative impact on</p> <ul style="list-style-type: none"> • city services • traffic • parking • heritage preservation • and green space <p>In my own personal experience, my neighborhood and Cunard and Gottingen currently has 3 big projects, 2 of which [redacted] my residence. For nearly 2 years, we've been plagued with near constant jackhammering starting at 7 in the morning and often lasting all. In addition, the area has become nearly unwalkable with all the sidewalk and street space this project take up. It is sooo unpleasant to be a pedestrian. And when those buildings become full, it will be impossible to drive a car because the city is increasing density but not bringing essential service to this higher population, forcing people to live in high-density areas but still having to drive places</p>

just to fulfill their basic needs. This city is becoming unlivable. And these new regulations will make it increasingly unlivable.

What's worse is that the new zoning bylaws do little to ensure increased levels of affordable housing. City streetscapes are being razed to build apartment towers with rents well over \$2000/month. Relying on a 'trickle-down effect' is not a well-grounded planning strategy to ensure that people have the homes they need at a price they can afford.

The changes these bylaws allow will be irreversible. Before our city is damaged beyond repair, we ask that you put in place specific risk-management strategies to

- mitigate potential harms arising from developments;
- mandate real consultation with existing communities before developments are approved;
- address infrastructure pressures;
- ensure public safety with updated evacuation routes; and
- align projects with current strategies such as the Integrated Mobility Plan and the Environmental Protection Plan.

There's rising dissatisfaction throughout the city because people's voices aren't being heard. Their communities are being radically altered without their input.

We understand our new mayor and many councillors have expressed nervousness about unfettered growth. Further, Council has asked the Province for legal protection from potential citizen claims of "constructive taking and de facto expropriation of private property" by allowing such rapid and unchecked development in HRM as a result of the Provincial Regulations.

That's why we're asking that zoning bylaws mandate a three-month period of active community engagement and involvement before the approval of any development project. We also ask Council to withdraw this request for legal protection by the Province.

Best,
[redacted]

Hello [redacted],

Thank you for sharing feedback on changes the municipality is making to comply with the provincial Minimum Planning Requirements. We've recorded your comments, and they will be used to inform a report to Regional Council this spring. There will be an additional opportunity for public comment at that time as part of the public hearing process.

For some additional context, [in August 2024, the province announced 12 new minimum planning requirements regulations](#). The municipality is legally required to

update land use bylaws and plans to meet these requirements. While the minimum planning requirements affect some specific regulations, they do not change the permitted uses (types of dwellings) or density (number of units) set out in the land use by-law zones.

All the best,

TELINA DEBLY | MCIP, LPP
PLANNER II
REGIONAL PLANNING | PLANNING & DEVELOPMENT

Appendix B - Correspondence Attachments

HALIFAX BIDs

HALIFAX REGIONAL
MUNICIPALITY

FEB-05-2025

MUNICIPAL CLERK

LN LL

February 5, 2025

Halifax Regional Municipality Council
Halifax City Hall
1841 Argyle Street
Halifax, NS B3J 3A5

Municipal Clerks Office

Date Distributed: FEB-07-2025
Mayor, Councillors, CAO, Solicitor,
Communications, Public Affairs, Gov.
Relations, Mayor's Chief of Staff

Other: Anne Winters, Leah Perrin,
Kate Greene, Jacqueline Hamilton

Dear Mayor Fillmore and Members of Regional Council:

We are writing to seek your support in advocating to the Provincial Government to rescind the recent amendment to the Municipal Charter Minimum Planning Requirements Regulations that will significantly reduce the percentage of ground-floor commercial space required in residential buildings. As you know, the vitality of our downtowns and main streets is integral to the character and success of our communities, and this change could undermine our efforts.

With a growing population, increasing densification, and reductions in available parking, it is essential to continue providing walkable amenities that serve the needs of our communities. Ground-floor commercial space is vital in sustaining small businesses that drive neighborhood growth and create a sense of place for residents and visitors alike. Reducing the percentage of commercial space in new developments would not only limit access to essential services but also directly impact our ability to fund critical programs that help our downtowns and mainstreets thrive. While the goal for all is to lessen our dependence on cars, this amendment will force residents to travel for goods and services.

The 9 Business Improvement Districts (BID) of Halifax Regional Municipality are currently working to support over 3,300 local businesses, which together account for approximately 23% of HRM's total commercial assessment—valued at \$10,556,646,400. Through private funding of \$4,005,281, BIDs are able to deliver essential services such as marketing, advocacy, placemaking, and events. These services are crucial not only for helping businesses survive and grow but also for enhancing the overall quality of life in Halifax and contributing to the local economy.

By reducing the required amount of commercial space at ground levels, we risk making it more difficult for small businesses to establish themselves and thrive in areas where they are most

needed. Furthermore, it limits the funding available for the programs and initiatives that create lively, well-maintained, and attractive downtown areas—places that everyone in the community can enjoy.

We respectfully urge you to take a stand and advocate on behalf of the residents, small businesses, and community organizations that rely on a mixed-use urban environment. By pushing the Provincial Government to reconsider this amendment, you can help ensure that Halifax's downtowns and main streets remain welcoming for everyone.

Thank you for your attention to this matter. We look forward to your support.

Submitted by the Business Improvement Districts of:

Downtown Dartmouth

Downtown Halifax

North End Halifax

Porters Lake

Quinpool Road Mainstreet

Sackville

Spring Garden Area

Spryfield

Village on Main

The following is a response to the recent CBC story covering the eviction of a Canadian Armed Forces Veteran living in a Recreational Vehicle (RV) comfortably, maintaining his wellness and employment. The location is Wellington, Nova Scotia.

By laws need urgent updating to include the use of Recreational Vehicles for habitation while the ongoing housing crisis continues.

It is urgent that HRM planners and HRM council come together to make a simple change to these by laws in order to offer dignity to those who utilise RV;s as a safe warm place to call home. An RV is a safer, more dignified home than a shelter or tent. RV's are currently accepted and used in provincial campgrounds.

The following are excerpts from Halifax Regional Municipality vision, Regional

Regional Plan's vision to "enhance our quality of life by fostering the growth of healthy and vibrant communities, a strong and diverse economy, and sustainable environment"

HRM is now asking residents to review the updated Regional Plan and let us know if its content and policies reflect the earlier input received from the Themes and Directions engagement, as well as the direction from the Priorities Plans.

****** Minimum Planning Requirement (b) The Government of Nova Scotia has required that Halifax Regional Municipality include mandatory content in the Regional Municipal Planning Strategy (Regional Plan) to address the issue of housing supply. This will require the municipality to make changes to the Regional Plan, community plans and land use by-laws. ******

Requirement: b) require that priority be given to increasing the supply of safe, sustainable and affordable housing in the Municipality over other interests identified in the municipal planning strategy for the purposes of all processes, approvals and decisions made under the municipal planning strategy

Approach to homelessness

Adapting our approach

The municipality has adapted its approach to reflect changes that are impacting the homelessness crisis. As capacity for indoor shelters and supportive housing options continues to increase, the municipality is directing its focus away from the provision of designated locations and towards helping those experiencing homelessness to access better accommodation options. The municipality is constantly assessing the need for designated locations. As more indoor shelter spaces and supportive housing options become available, more parks will be closed, de-designated and returned to their intended purposes as spaces for everyone.

Read the [Feb. 7, 2024 Municipal statement about encampments and de-designating locations](#).

- The municipality's approach to homelessness centres on treating people experiencing homelessness in our public spaces with dignity while working to find ways to best support them within our capacity and scope as a municipality.
- ***The right to adequate housing is embedded in international law, federal legislation, and municipal strategies and frameworks. Accordingly, the municipality understands encampments to be in violation of individuals' rights to adequate housing.***
- ***For these reasons, the municipality's approach involves allowing those sleeping rough to remain in designated locations until indoor shelter spaces or housing options have been identified and offered, or until the health and safety of the occupants or public are at risk.***
- This approach does not condone or support the installation of infrastructure associated with encampments and requires that steps be taken to address demonstrated risks to the health and safety of occupants or the public.

- The municipality's response to homelessness is collaborative and community-based. The municipality is the primary funding partner for the Street Outreach Navigators, through the downtown business improvement districts. The Street Outreach Navigators help ensure those experiencing homelessness have access to appropriate supports.
- The Province of Nova Scotia, as well as community-based partners including the Street Outreach Navigators and housing support workers, continue to offer those experiencing homelessness with support – including a range of housing options and/ or temporary accommodation.

As the municipality considers its ongoing support around the issue of homelessness, ***the following principles are guiding efforts by staff:***

- ***The municipality wants everyone to have a home.***
- ***As supported by the Government of Canada in their Reaching Home initiatives, Housing First is the recommended approach to help individuals experiencing homelessness.***
- ***Every action the municipality takes in assisting people experiencing homelessness should be grounded in a harm reduction approach, consider how it supports human rights, and maintains personal dignity for those affected.***
- Relationship building, learning, education, and voluntary compliance are always preferred over an involuntary compliance action.
- Transparency and ongoing communication are essential for the development of trust.
- Whenever possible, the municipality should avoid duplicating the work of other service providers in the community and instead support them in their efforts to serve residents better.
- Nothing for us, without us – the people who will be impacted by decisions and actions should be meaningfully involved in those decisions.
- Everyone is expected to follow the law.
- Halifax Regional Police (HRP) should not be a primary response to many of the issues surrounding homelessness. HRP should be focused on the prevention and resolution of crime. Responses to issues surrounding

homelessness should whenever possible be led by Street Navigators, service providers, and civilian compliance officers.

A municipal planning strategy must do all of the following to address the issue of housing supply: • **Recognize housing is an urgent priority;** • Give priority to increasing the supply of safe, sustainable and affordable housing; • **Permit residential uses in all zones, except for: • Industrial, • Military, • Park, • Transportation reserve, • Utility uses, and • Zones for environmental sensitivities;** • Information sharing to support housing development; • Permit manufactured housing in all residential zones;

The Regional Plan will help guide future land use planning decisions and support an increase in housing supply and housing options that are safe, sustainable, and affordable. **While no immediate changes to zoning or land use regulations are proposed with this new policy,** increasing the supply of new housing across the region will be an important consideration in future land use planning efforts.

Minimum Planning Requirement (I)

The Government of Nova Scotia has required that Halifax Regional Municipality include mandatory content in the Regional Municipal Planning Strategy (Regional Plan) to address the issue of housing supply. This will require the municipality to make changes to the Regional Plan, Community Plans and Land Use By-Laws.

For a full list of changes [click here](#).

Requirement:

I) permit manufactured housing, including modified shipping containers converted into housing, in all residential zones

How will the municipality meet this requirement?

- Definitions and regulations in the land use by-laws are being adjusted to allow converted shipping containers as a residential use.

Plans Affected:

All land use by-laws

What will this change mean for me?

- You will be able to use a converted shipping container for a main residential dwelling or a backyard suite. Some by-law areas already permit this.
- Shipping containers will have to meet Building Code requirements to safely convert the shipping container into a dwelling use.

Have questions?

Visit: shapeyourcityhalifax.ca/minimum-planning

Email: regionalplan@halifax.ca

Call: 902-943-5139

Please share your comments by February 24, 2025.



2025

WOODLAWN MALL REDEVELOPMENT GROWTH AREA PLAN

Prepared by

Fathom

fathomstudio.ca
40 King Street
Dartmouth, NS
B2Y 2R4

Prepared for
Kasia Tota and Ben Sivac

Submitted
Jan 14, 2025

Submitted By
Rob LeBlanc, Director of Planning



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Woodlawn Mall Redevelopment Plan

Dear Team,

Thanks for taking several meetings over the past year to try to advance this file. Our original submission back on Feb 29, 2024 focused on redeveloping the Staples site which has a rapidly expiring lease in 2026 so there has been some time pressures to secure a deal to move a new Staples into a part of this redevelopment. As such, we have met several times throughout 2024 but we still have not found a pathway that works for HRM and within the owner's time constraints.

During our last 2 meetings, staff have mentioned that they would like to see a plan developed for all of the Diab's Woodlawn land holdings; not just the Staples site. This report provides a plan that looks at the future buildout of the entire site, including the phasing, pro forma and high level traffic and servicing implications. This submission is not meant to be a fully fleshed out solution but it represents the owner's desire to advance this project in good faith to find a mutual acceptable approval pathway that will lead to a DP for the first phase sometime in 2025 to provide Staples with a viable alternative to staying at this site. We believe the plan is a win win for HRM, the developer and the community in that it creates a dense transit oriented development and resolves a significant problem at the Woodlawn/Athorpe intersection.

We recognize that the Suburban Plan team is swamped with preparation of the upcoming plan, but we also realize that the Growth Area team does have some capacity to advance a project like this. We hope you will give this submission some serious consideration and will help us find a pathway to rapidly advance the file over the next few months.

As always, we are available for questions and discussion at your convenience.

Sincerely,

[REDACTED]
Rob LeBlanc, President

[REDACTED] mobile
[REDACTED]

Submitted
Jan 14, 2025

01

Background

Woodlawn Mall opened in the early 1970's with the anchors of Metropolitan and SaveEasy. The mall was shaped in an L-configuration as exists today and a centre court was in the middle of the concourse, with a lunch counter in it. There was also a Lawtons Drugs. Directly attached to the mall was a plaza section, which had Consumers Distributing and a medical centre.

The failing mall was converted to the Woodlawn Plaza in the early 1990s and the centre concourse was removed providing deep commercial plates that fronted onto the large parking lot. The new plaza included Lawtons Drugs, Dartmouth Regional Library, and Deluxe Laundromat, . A few years after the plaza opened, Business Depot (Later rebranded to Staples) opened a standalone location within the property. After this, the plaza was renamed to Staples Business Depot Plaza for awhile, the name was changed back to Woodlawn Plaza in 2009. In 2011, Giant Tiger opened as an anchor tenant.

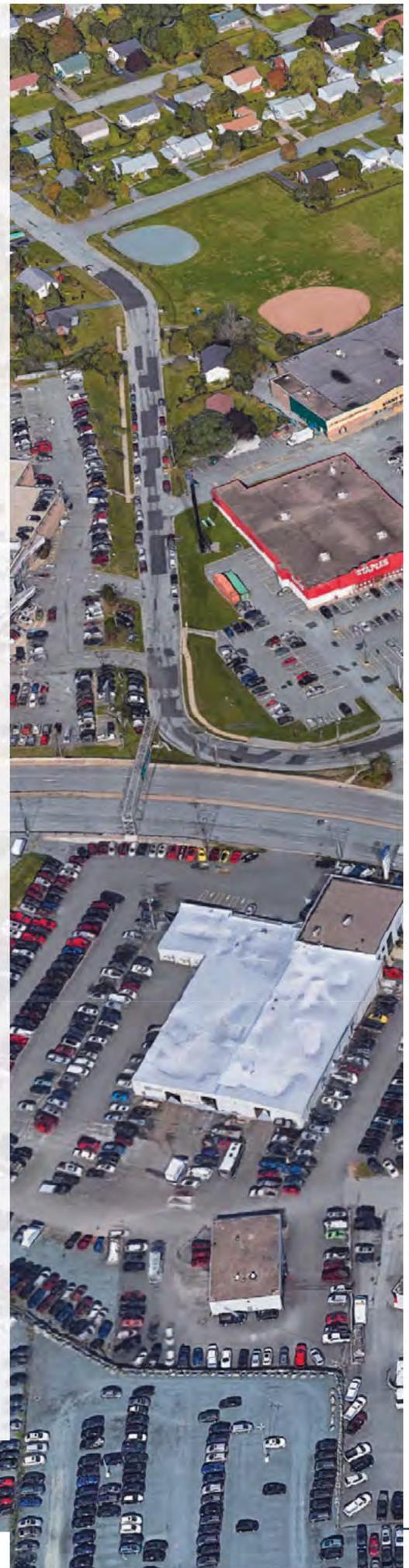




Image © 2024 Airbus

The Changing Nature of Urban Mall Sites

The evolution of shopping malls reflects broader changes in consumer behaviour, urban planning, and economic realities. Once dominant as retail destinations in the late 20th century, traditional malls have faced challenges from e-commerce, shifting demographics, and evolving preferences for experiential and community-centered spaces. As a result, many malls have transitioned into mixed-use developments, blending retail with residential, office, and recreational spaces to stay relevant in a changing market.

This shift often involves reimagining underperforming or abandoned malls to create vibrant, multi-functional hubs. Developers are incorporating elements like apartments, co-working spaces, fitness centers, and green spaces alongside traditional retail. These mixed-use projects aim to foster a sense of community, attract a diverse range of visitors, and extend the time people spend on the property, thus increasing its value and appeal.

Experiential offerings are another key feature of these transformed spaces. Dining, entertainment, cultural events, and interactive activities now play a central role. Cinemas, live music venues, art installations, and pop-up markets are commonly integrated to enhance the social and leisure aspects of these developments, making them destinations rather than mere shopping centers.

Urban planning and sustainability considerations also drive these changes. Many malls are being designed or retrofitted to include eco-friendly features like energy-efficient systems, green rooftops, and walkable layouts. The integration of public transportation and pedestrian-friendly designs further aligns these developments with modern urban lifestyles and environmental priorities.

The rise of mixed-use developments reflects broader economic trends as well. Retailers benefit from proximity to residential and office spaces, while tenants and workers enjoy convenient ac-

cess to services and entertainment. This symbiotic relationship creates a more resilient economic ecosystem, particularly as retail alone no longer guarantees a mall's success.

Moreover, these projects often serve as anchors for community revitalization. In suburban or declining urban areas, redeveloped malls can attract investment, create jobs, and provide much-needed amenities. By blending uses, they address the need for housing, leisure, and economic activity in one centralized location.

While the mixed-use model offers many benefits, it also comes with challenges, such as high development costs and the need for effective zoning and planning. Nevertheless, the trend shows no sign of slowing, as it aligns with shifting consumer demands and urban priorities, offering a glimpse into the future of commercial and community spaces.

Woodlawn Plaza Site

In the case of Woodlawn Plaza, this 10.3 acre site is highly underutilized. Over half the site is occupied by parking (4.7 acres or about 450 cars), and the remaining commercial footprint occupies about 13,950 m² (150,640 sf).

The site is strategically located at the corner of the Portland Street Arterial and the Woodlawn Road Major Collector. The site is within a 1 minute walk of 4 bus routes on Woodlawn Road (the 66, 62, 78 and 58 routes) and within a 2 minutes walk of 6-bus routes on Portland Street (the 57, 59, 61, 68, 79, 159). The site is also within 360 m (5 minute walk) of the Pernhorn Mall terminal (which has 8 bus routes), and 2.3 km (30 minutes walk) of the Portland Hills Terminal (which has 9 bus routes).

As part of the Dartmouth East AT Functional Plan, Designpoint and Fathom Studio prepared a plan for a new AT network on Athorpe and Woodlawn Road. The plan called for either a bi-directional bikeway or a multi-use path on the south side of the study area

Fig. 1. Halifax Transit Map

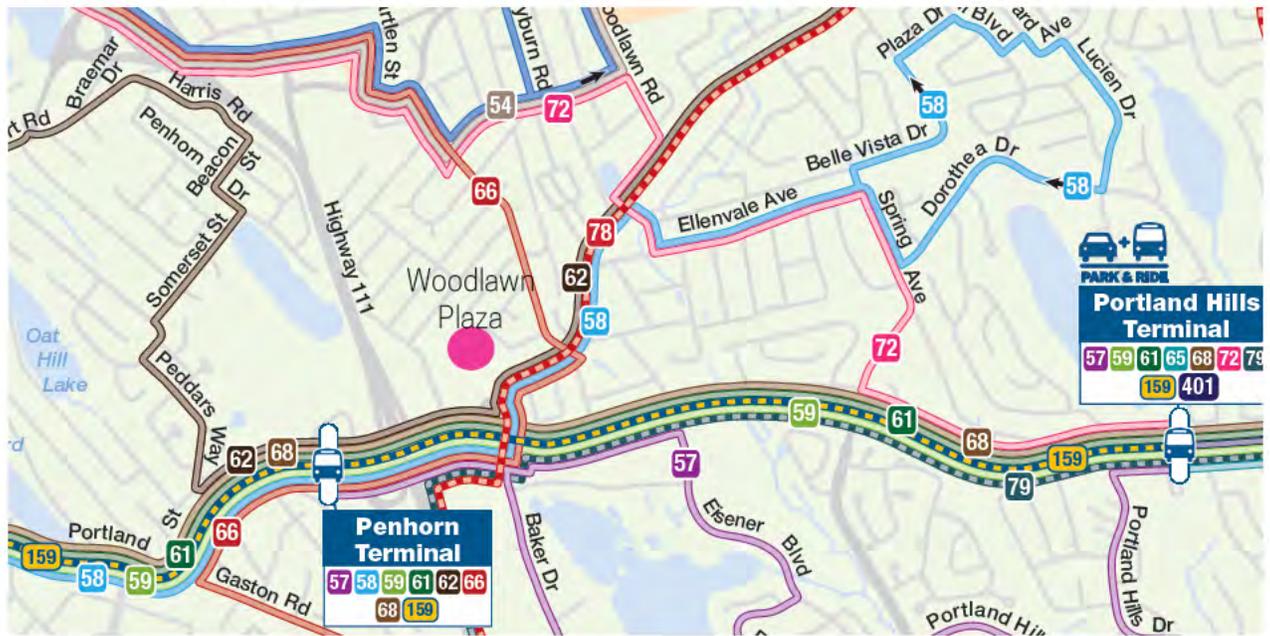


Fig. 2. Dartmouth East Functional AT Plan

SEGMENT 1

ATHORPE DR

Which option would you prefer?

Use stickers to paste them on to the option you prefer.



Segment 1. OPTION 1 - MULTI-USE PATH
A MULTI-USE PATH is located on the south side of Athorpe Drive, replacing the existing sidewalk. A ramp connects the path to the Portland Street overpass.

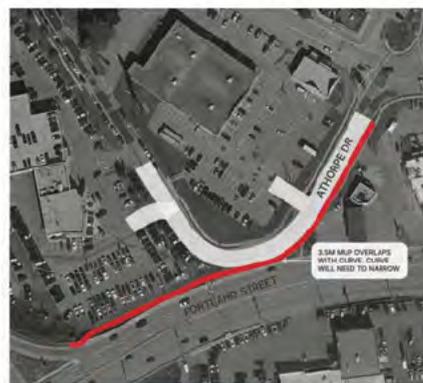


Segment 1. OPTION 2 - BIDIRECTIONAL BIKEWAY
A BIDIRECTIONAL BIKEWAY (two-way bike traffic) is added on the south side of Athorpe Drive. The bikeway is separated from traffic lanes with a curb. Traffic lanes are narrowed and the current sidewalks would remain for pedestrians.



KEY PLAN

One outbound lane on Woodlawn Road is removed to create space for bike lanes. The intersection operates like it does today, but is narrowed. Smart channel right turn lanes are added to improve truck turning access. The bikeway or multi-use path from Athorpe Drive transitions to bike lanes to the north on Woodlawn Road. A multi-use path connects the intersection to Portland Street. The path is expected to continue to the multi-use path on Beker Drive.

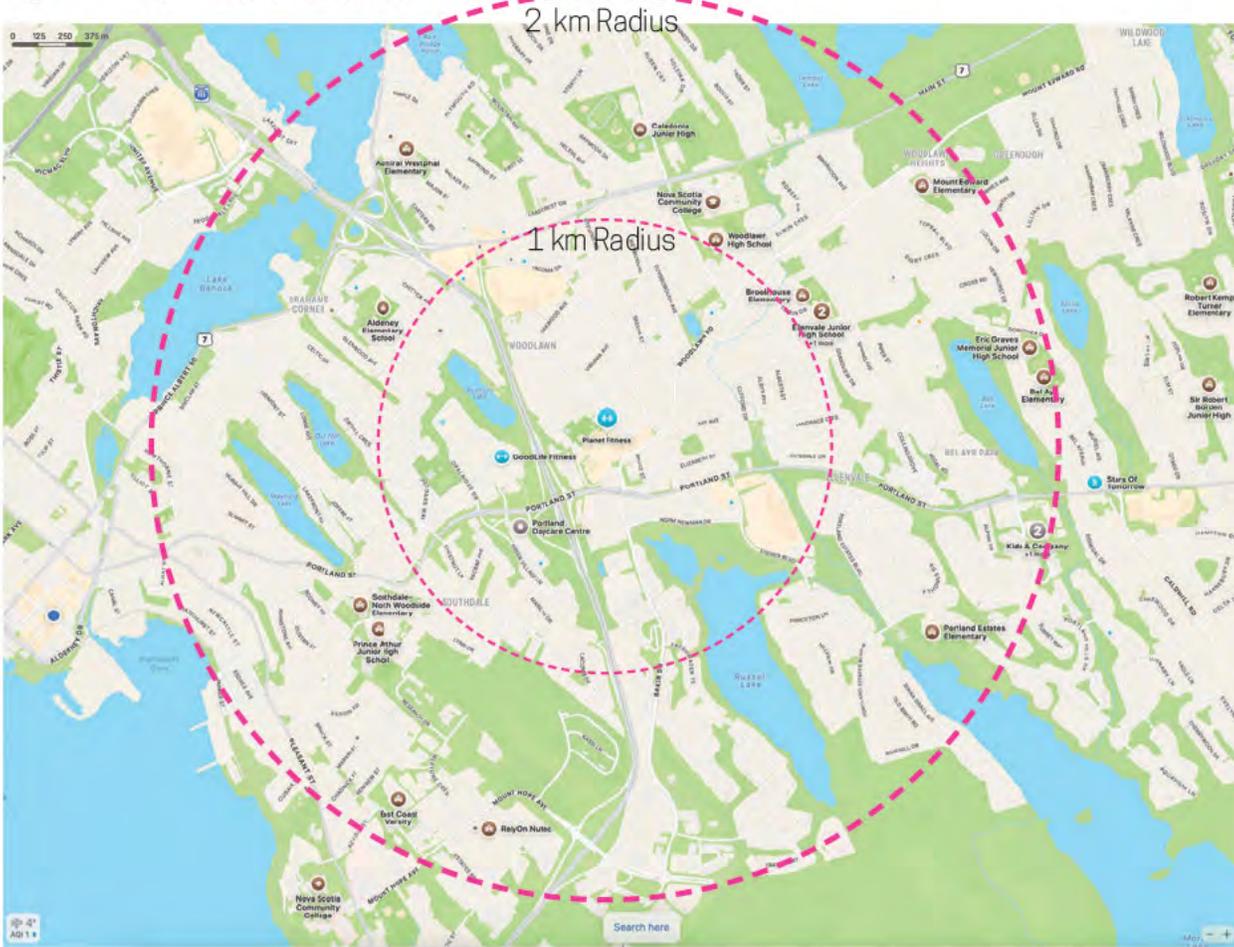


Segment 1. ATHORPE DR PARKING



Intersection 1: ATHORPE / WOODLAWN

Fig. 3. Site School Commutershed



Woodlawn School Commutershed

This site is within 1km of Woodlawn High School, and within 2km of an additional 14 schools ranging from elementary to junior high, high schools and the NSCC Campus. According to the provincial School Transportation Policy, transportation must be provided for students in elementary grades, including children attending pre-primary programs who live more than 1.6 km from the school in their designated catchment area. Similarly, transportation must be provided for students in middle and high school grades who live more than 2.4 km from the school in their designated catchment area. As such, many of these schools are within walking distance of the Woodlawn Plaza site.



Fig. 5. Existing Road Conditions



Fig. 4. Woodlawn Mall, Sept 1979

Athorpe/Woodlawn Intersection

In the 1990's the Athorpe intersection was redesigned to shift the entrance of Woodlawn Mall from a more easterly location over to a more central location next to the old Harveys. In doing so, the simple T-intersection of Athorpe and Woodlawn Road, was converted to a much more challenging and unsafe intersection that exists today.

The idea of closing Athorpe west of this intersection simplifies the intersection back to a 3-legged T-intersection, bringing Athorpe closer to the middle of the Woodlawn Plaza site.

1.1 Mobility Network

This new proposed development is strategically situated at the intersection of key transportation routes, including:

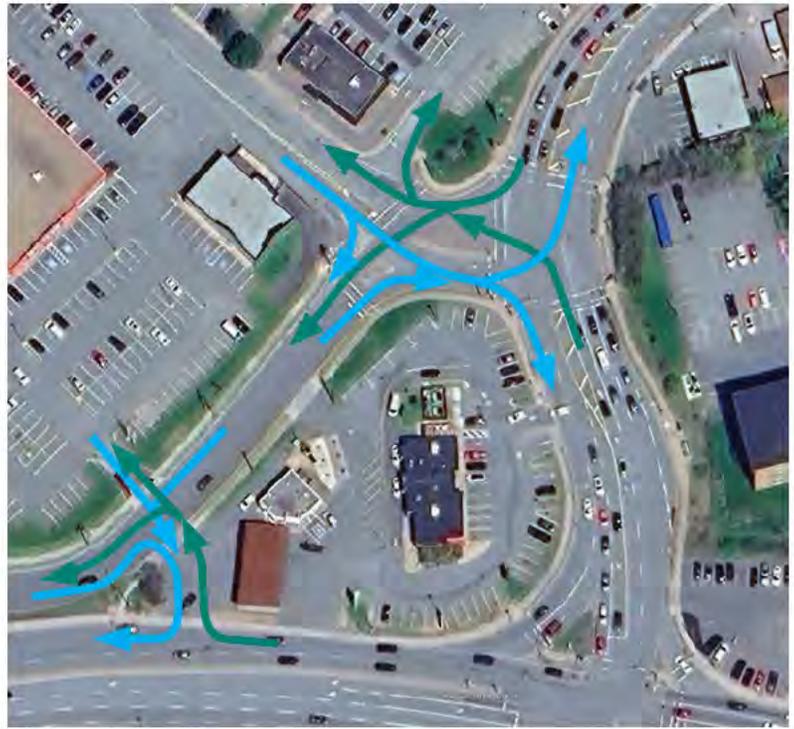
- Portland Street/Cole Harbour Road - links Downtown Dartmouth to the Circumferential Highway, Forest Hills Parkway, and extends to Lawrencetown Beach and beyond.
- Circumferential Highway - connecting Portland Street south to Mount Hope, Pleasant Street, Eastern Passage, Shearwater, NSCC and Woodside Ferry Terminal; and north/west to the MacKay Bridge, Highway 118, Dartmouth Crossing, Burnside Business Park and many points in between.
- Woodlawn Road - connecting north/east toward Cole Harbour, Main Street and larger residential areas.

The Portland / Cole Harbour Road corridor is currently the subject of a corridor functional design study which includes three distinct sections of roadway.

The development is located in the central segment between Gaston Road and the Portland Hills Transit Terminal and is noted as having the widest cross-section, carries over 40,000 vehicles per day, and has numerous intersections that typically experience some levels of congestion. The intent of this new development project is to enhance the “people-moving” capacity of the corridor through the creation of complete streets focusing on active transportation, transit priority, and road safety.

Resolving existing challenges associated with intersections within and immediately adjacent to the development are a critical part of that study, but also integral to this proposed development. The close proximity of the existing intersections of: Woodlawn Road with Athorpe Drive; the interconnected intersection of Athorpe Drive with multiple mall access points; and, the Woodlawn / Portland / Baker intersection, create complex set of traffic movements





with a very high number of potential conflict points and a poor safety record.

Historical collision statistics for these intersections suggest about **156 collisions were reported in the vicinity of these intersections between 2018 and 2024** (about 26 collisions per year on average). Many of these collisions can be attributed to the complexities experienced by drivers through these intersections. The road network proposed for this development in combination with intersection options identified in the Portland/Cole Harbour Road functional study can, and should be integrated to help resolve these complexities and improve safety and operational performance. Such benefits are expected to improve conditions both internally to the site and through the adjacent intersections near the site.

The two figures on the facing page show the proposed preliminary intersection options included on the HRM website to address intersection and access options in the area. These options should be reviewed in the context of the proposed development and site transit requirements.

Trip Generation

Preliminary trip generation estimates were prepared for the proposed development and included the removal of existing traffic associated with the existing commercial land uses, and the addition of the new mixed-use development, which included

both residential and commercial land uses. These preliminary estimates suggest that total volumes to and from the site will be similar in magnitude and characterized by increased volumes during the AM peak hour and decreased volumes during the PMP hour.

	Daily		Weekday AM Peak		Weekday PM Peak	
Existing	2700	2700	175	100	515	255
Proposed	3874	3874	175	401	398	301
Difference	1174	1174	0		-117	+46

Modal Share

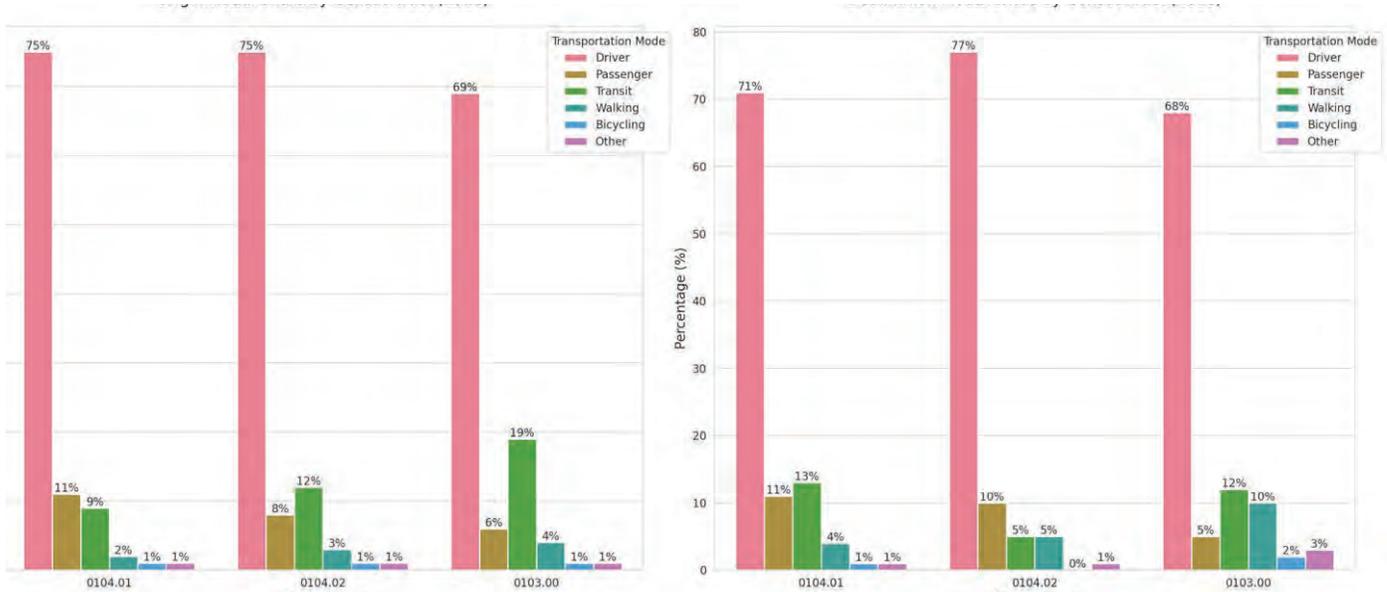
These estimates include adjustments for on site synergies and a shift in person trips to transit and active transportation modes of travel. Both have the potential to be significant given the location of the site. HRM's open data portal provides estimates of 2016 model share distribution as represented in the figures below.

Census Tract 104.01 includes the development site, and Census Tract 104.02 is situated on the south side of Portland Street, both located outside the Circumferential Highway. Census Tract 103, located inside the Circumferential Highway and experiences higher active transportation, and lower driver modal shares due to its closer proximity to

downtown and core employment areas. The higher levels of active transportation travel just inside the circumferential Highway suggest that the proximity of the development to the core areas of downtown Dartmouth has the potential to increase active transportation usage as compared to areas further outside the circumferential Highway. This assumes safe and convenient, active transportation conveyance across the Circumferential Highway, and uninterrupted AT routes to the downtown core.

This location is well located on existing Portland Street transit routes, including the BRT

“Red Line” service. The future transit priority corridors identified along Portland Street in the vicinity of the development and towards the downtown core provide increased opportunity for a higher density development such as this to access and utilize transit services. There is also potential that this site could serve as a minor transit hub, collecting ridership from Woodlawn, Baker and the abundance of surrounding commercial and residential areas near this site. As such, it will be important to identify potential transit stops and transfer locations to help support increased transit ridership.



1.2

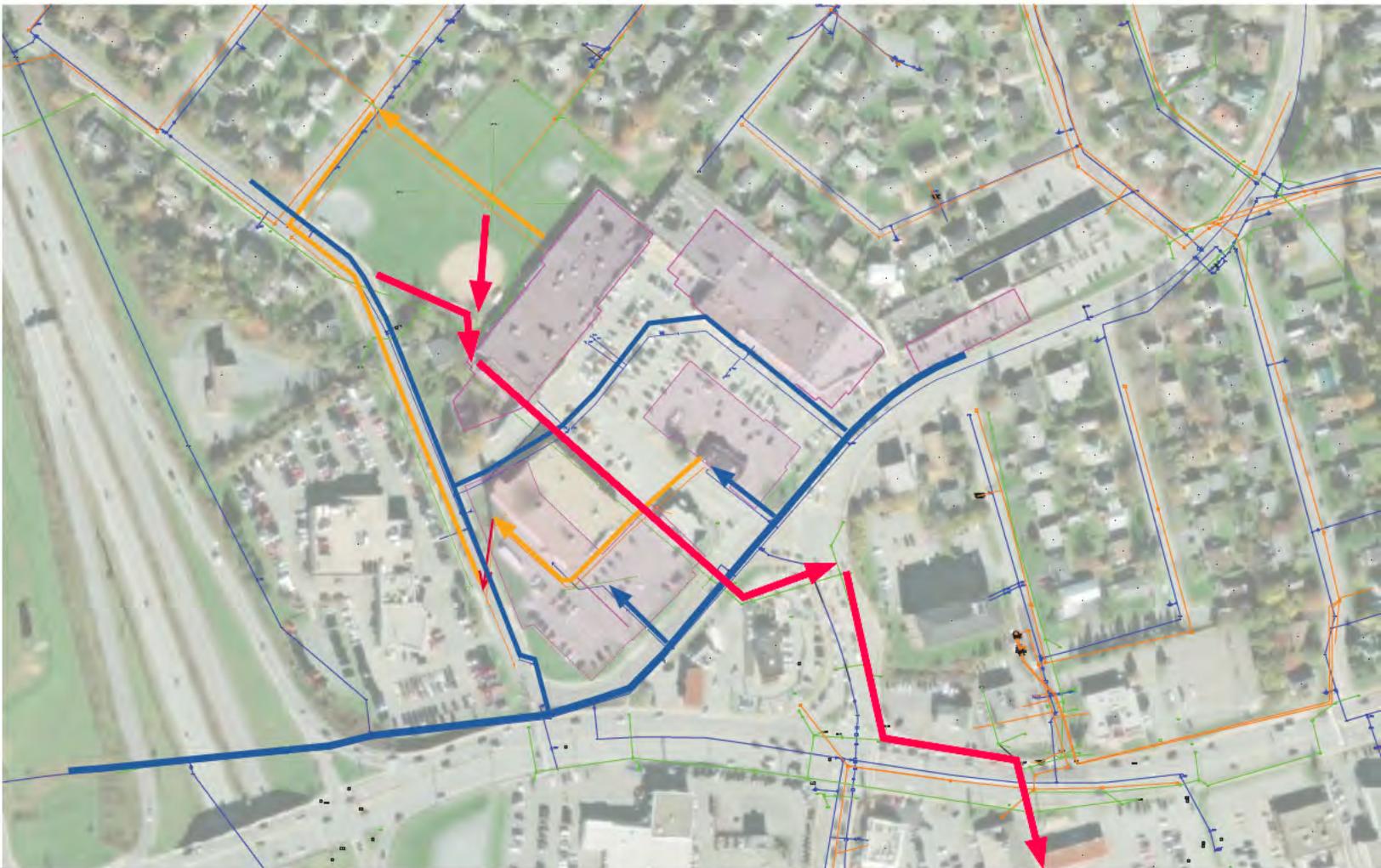
Servicing

Existing municipal servicing data was obtained from Halifax Water in order to better understand current infrastructure that is present in the vicinity of the development. The figure below shows existing and proposed building locations (MAGENTA) along with existing municipal services including Sanitary Sewer (ORANGE), Water (BLUE) and Stormwater (GREEN).

Sanitary Sewer - Two existing pipes service the existing development and are directed to the Dartmouth Wastewater Treatment Facility. This includes a connection to a 375 mm concrete pipe running north along Athorpe Drive that is pumped

from the existing site to the main, and a gravity feed from the back of the existing Giant Tiger building, across the sports field to Lawson Avenue discharging to a 450mm concrete sanitary main. The majority of pipes were installed around 1970.

Existing design flows from the site are relatively low given the primarily commercial nature of the site. Future sanitary flows are estimated to be in the range of 60 to 70 litres per second under full buildout conditions. The existing pipes in the vicinity of the development appear to be of adequate size to accommodate the proposed development. Future sanitary servicing will required the removal and



reconstruction of most existing site sanitary services and will likely still require a pumped solution for portion of the development. A detailed downstream wastewater analysis has not been completed at this time.

Domestic and Fire Water - A 600 mm cast iron transmission main (installed 1952) is present along the south side of the development running along Woodlawn and Athorpe Drive to a crossing of the Circumferential Highway. Three separate service connections are provided to the existing commercial site from this main as well as connection to a 200mm residential water distribution main (installed in 1970) running north along Athorpe Drive. The eastern most site service connection and the Athorpe distribution main connect to form a service loop through the development site. Current site design suggest that the majority of these site service could remain in place.

Municipal water design flows are generally governed by fire flow requirements and preliminary calculations suggest that design flows would likely increase from about 230 litres per second for the existing commercial development to about 250 litres per second under the proposed mixed residential / commercial development scenario.

Stormwater - The existing site is nearly completely covered by asphalt parking lots and buildings, suggesting rapid discharge of stormwater during storm events. Detailed analysis has not been undertaken at

this time to determine whether existing stormwater management features are in place on the site to manage stormwater under larger storm events.

Stormwater is generally conveyed from areas north, and from within the development site through a 1050 mm concrete stormwater main running through the middle of the site, just east of the existing Staples building. This water travels through a series of municipal pipes, south across Portland Street discharging to Russel Lake about 300 meters south of the site.

It is expected that the proposed site will incorporate significantly more green space and a variety of stormwater management features that will enhance the stormwater management capabilities of the site well beyond what is currently present or achievable on the existing site.

Conclusions

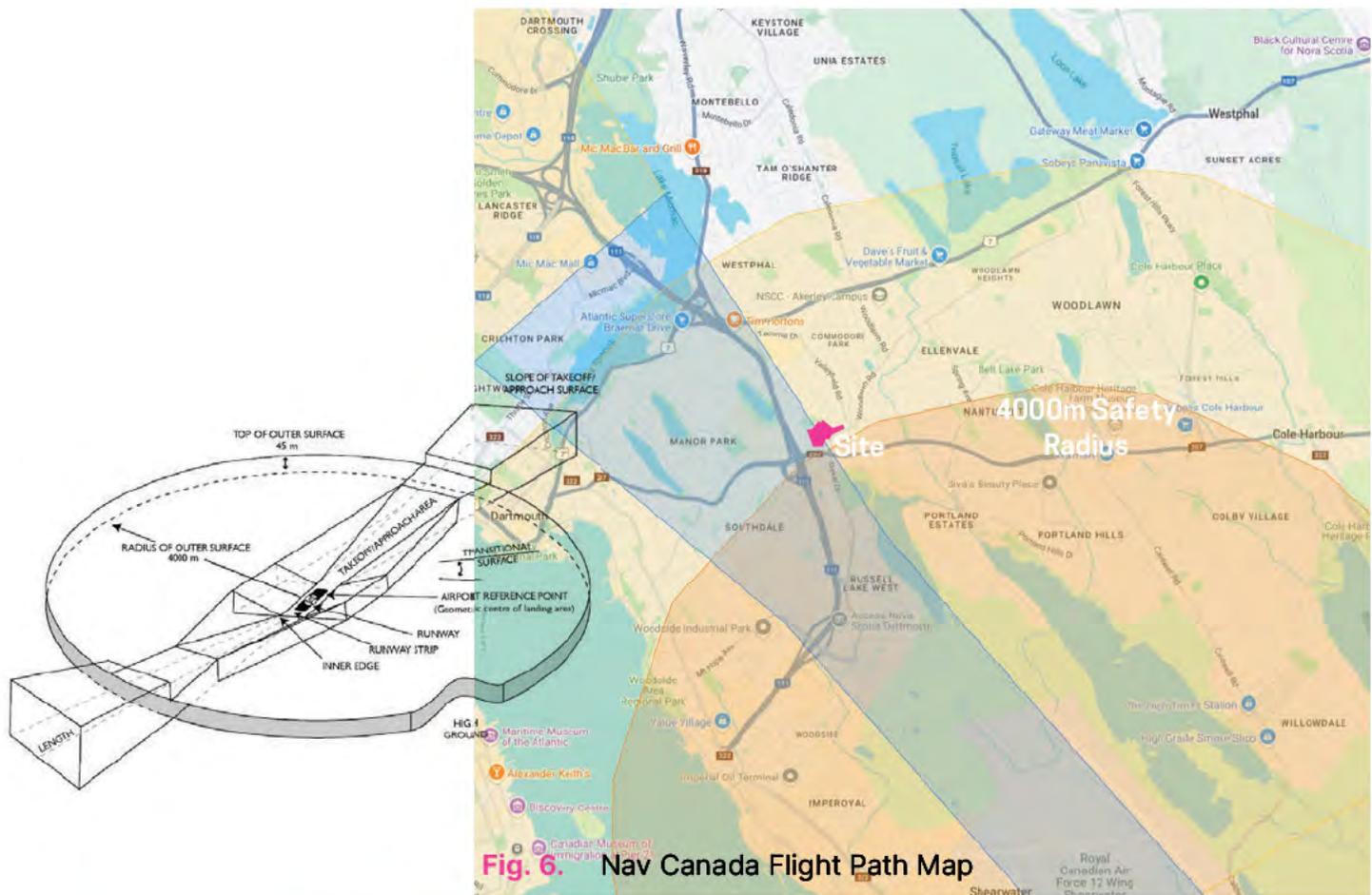
Given the sites location in an established commercial and residential area, the development is well served by existing municipal infrastructure. There do not appear to be any impediments to utilizing existing infrastructure to service the proposed development, though a number of on-site relocations or replacements of existing site infrastructure will be required. It is also anticipated that a new sanitary pumping station will be required within the site to accommodate wastewater flows from some of the new buildings.

1.3

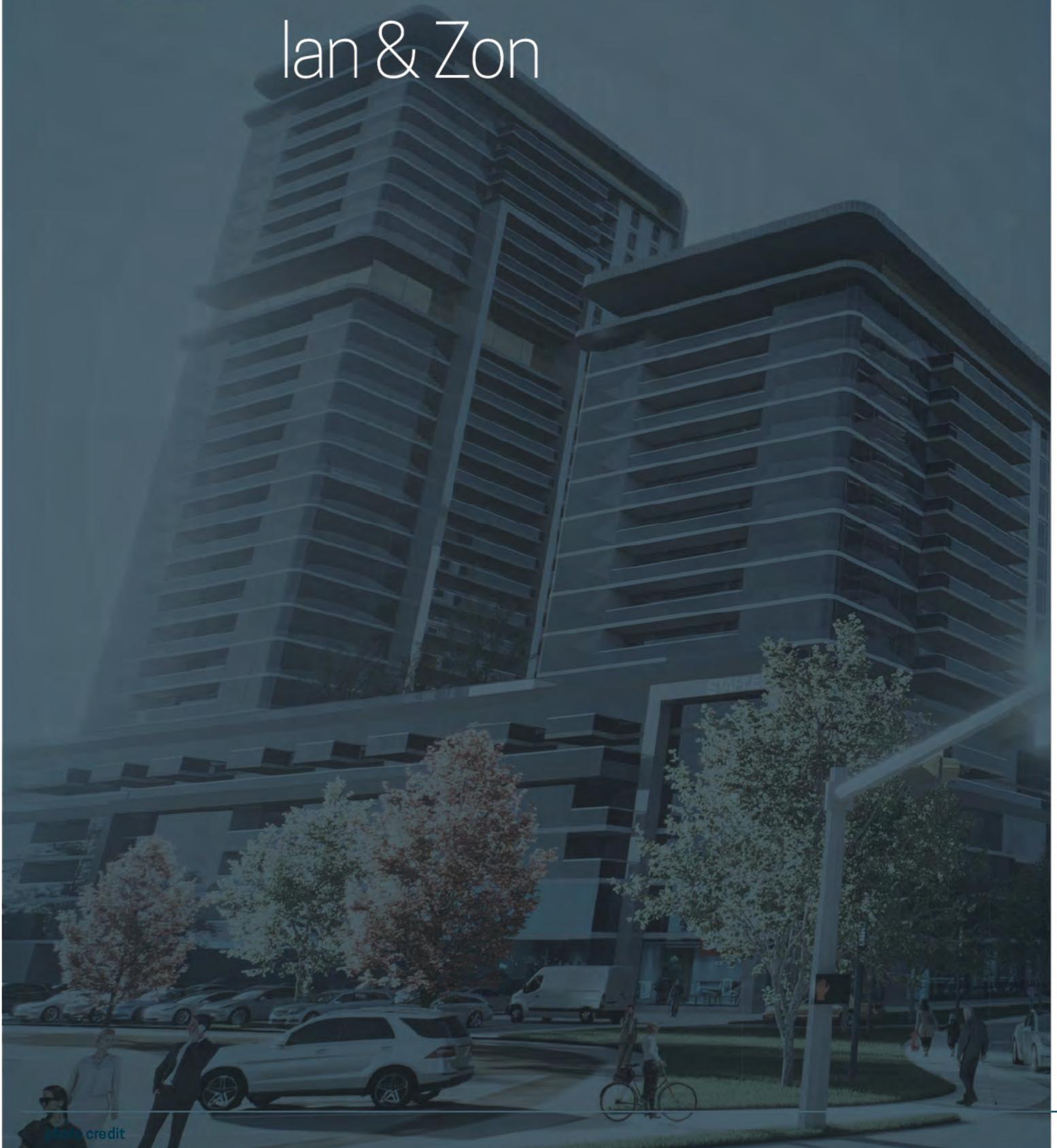
Nav Canada Analysis

A portion of the west side of Woodlawn Mall is in the flight path of the Shearwater Airport. Though the airport has been closed for many years, the flight path has not been formally dissolved. The site is approximately 3.3km from the end of the Shearwater runway and the site is within 2m of the elevation of the runway. Assuming a tallest building height of 30 storeys (100m), this represents a slope of 0.3% or 0.174 degrees. Since most planes land at an angle of 3 degrees, a 30 storey building should be well below the flight path of a landing plane.

We have submitted a formal request of Nav Canada through their Land Use evaluation process back on Jan 9 and we are awaiting final confirmation.



Ian & Zon



2.1

Existing Conditions

The Properties

The land parcels include PIDS 40610719, 41041096, 41481573, 41481565, and 00230516 (a single detached property) totalling 10.3 acres. The land would be developed in a phased fashion, as leases on existing commercial uses become due. The most pressing lease is the Staples site which comes due in 2026. Generally the site will be developed from west to east over time.

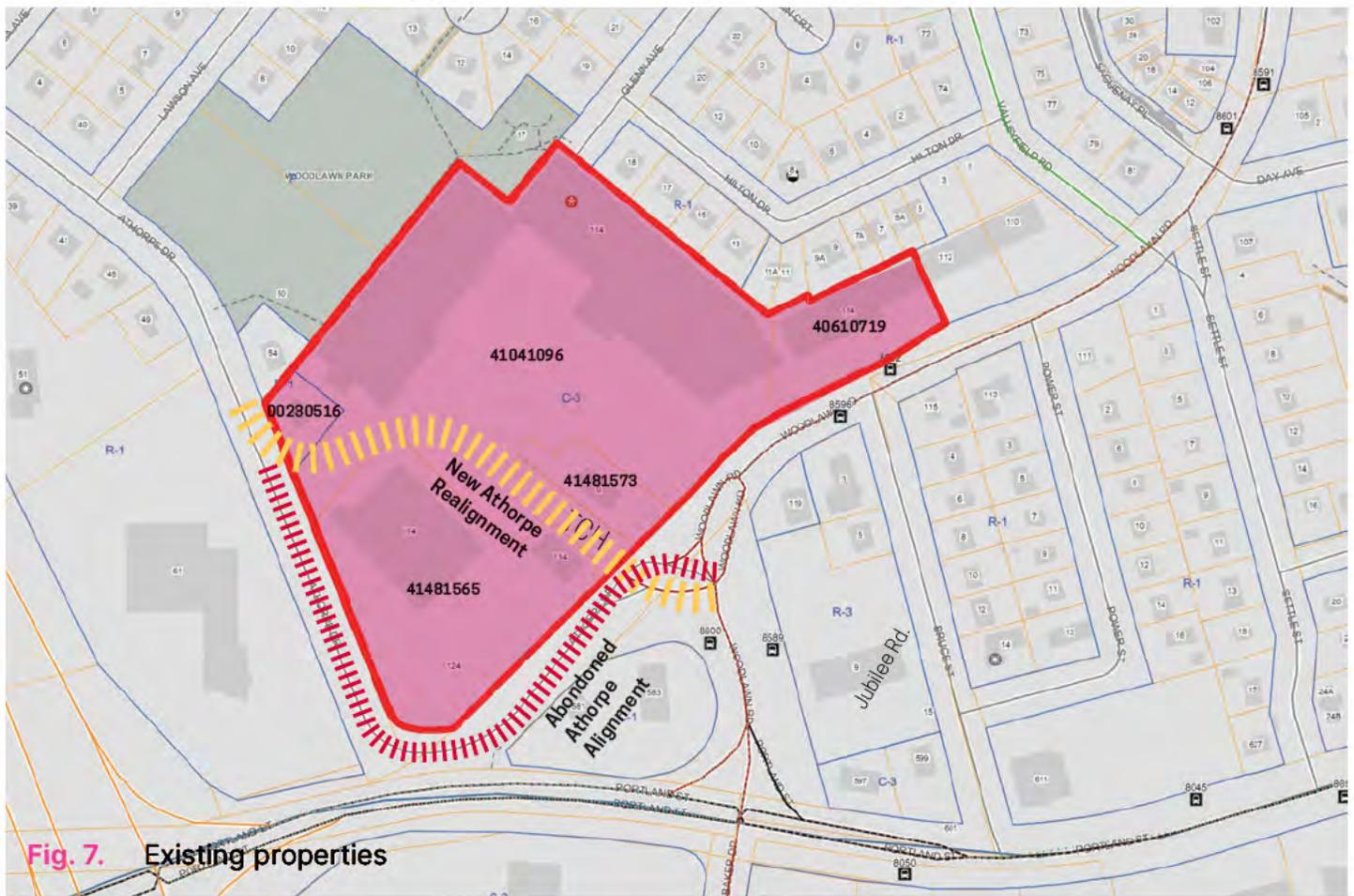


Fig. 7. Existing properties

Resolving the Athorpe/Woodlawn Intersection.

The Master plan revolves around solving the dangerous Athorpe/Woodlawn Intersection; realigning the road through the centre of the site and abandoning the U-shaped alignment which touches Portland Street. The plan imagines a land swap between HRM and the developer to realign the street on the east side of Staples. This alignment brings back a 3-legged T-intersection which creates a new urban street through the centre of the development which would include onstreet parking and wide sidewalks on both sides of the street. The AT lane could continue along Athorpe as proposed

in the Dartmouth East AT Functional Plan. Access to the Dartmouth Dodge Site could be preserved with an easement along the old Athorpe alignment, however, it would be much safer to access the dealership site from the north side of where the Athorpe re-alignment starts. The old south alignment of Athorpe would be reserved for some onsite parking for the new development and for the AT lane proposed in the functional plan.

There is some flexibility where Athorpe could be realigned and if the remaining single detached home was purchased by HRM or the developer, it would reduce the tight S-curve to the north of Athorpe. The

developer would expect HRM to build this new leg of Athorpe or partner with the developer. The road would be deeded to HRM upon completion.

It is important to note that the plan does not hinge on realigning Athorpe. The existing configuration could be maintained if HRM did not see the benefit of its realignment. Generally, the plan would be implementable as the roads are configured today, and what is proposed as a road would be converted to a private driveway. We believe that HRM will subscribe to the many benefits of its realignment.

2.2

Master Plan

The master plan images a mixed use, transit oriented development, with groundfloor commercial in a premium outlet style. The Toronto Premium Outlets (TPO) is a model development that creates an outdoor mall to access premium outlets like Nike, Dior, Louis Vutton, etc. The signature outdoor spaces form the backbone of the outlets. Unlike the TPO, this development will include substantial housing, potential for professional services office spaces like doctors or physiotherapists, and more urban format retailers like those in Liberty Village Toronto.

Fig. 8. Toronto premium Outlets



Fig. 9. Liberty Village Toronto





Fig 10. Master Plan

Port



Playground

Glen Avenue

Hilton Drive

Valleyfield

K

Service Lane

Evolve Fitness

Rooftop Parking
(3 levels)

J

Urban Plaza

Linear
Courtyard

H

Woodlawn Road

G

F

New Athorpe Alignment

A

Bruce Street

Wendy's

Woodlawn Road

Ultramar

land Street

Staples Redevelopment (Phase 1 and 2)

The Staples lease is due in 2026 and while the retailer would like to stay at this location, they need a better understanding of their future options in the very near future as this store is aging and requires investment if it is to stay in this location. The retailer is excited about a mixed use urban format as shown in this development concept. They are prepared to reduce their footprint from 28,000 sf to about 15,000 sf.

The plan shows a new Staples urban format integrated into Phase 1 of the master plan. In this phasing, the existing Staples building can be preserved until phase 1 is complete before moving into the new store location. Phase 1 includes 2 towers (28 storeys and 15-storeys) and a 5 storey midrise podium with a total unit count of 470 units plus the new Staples.

Once Phase 1 is complete, the existing Staples building can be demolished to make room for another 21-storey tower (260 units) and an additional 10,000 sf groundfloor commercial development. It may make sense to undertake phases 1 and 2 together if Staples cannot be secured in the new development. The staples site is currently 2.5 acres.

The new Athorpe realignment would not necessarily have to be completed before completing the new road.

Giant Tiger Redevelopment (Phase 3)

Giant Tiger has been an anchor retailer at Woodlawn since 2011. It draws from a large catchment throughout HRM and it is one of 5 locations in HRM. The Giant

Tiger lease will be coming due in 2028 and makes a logical third phase for redevelopment. In 2024, the Diab's secured 58 Athorpe just beside Giant Tiger and this R1 zoned parcel would likely be included in the redevelopment parcel of Giant Tiger.

This site is large enough for a 4-storey streetwall podium and two towers (16-storey and 12-storey). A 2 storey parking garage would be built under the the new building. Parking access would be via 58 Athorpe. The entire groundfloor of this new development would be reserved for commercial; potentially a new urban format Giant Tiger is a temporary location can be secured. There is room for Giant Tiger to be moved into the phase 2 commercial space.

Harveys Redevelopment (Phase 4)

The old Harveys site could anchor the new re-aligned Althorpe Drive bookending the new Staples redevelopment. Like the Giant Tiger redevelopment, this site is large enough to support a 5-storey street-wall podium with two towers above it (15-storey and 25-storey). One side of the development fronts on Althorpe and Woodlawn Road and the other side of the development fronts onto the new Linear Courtyard providing a total commercial groundfloor area of 3,400 sm and a residential count of 365 units above. There would be 2 storeys of parking below this site.

Much of this site was infilled in the past as it was a lowlying area (potentially a wetland) prior to the 1950's. As such, there could be geotechnical and drainage issues. As a result, it may be beneficial to

raise the new Althorpe road by upwards of 2m above existing grade to reduce the amount of cut for the 2 storey parking garages.

Bulk Barn (Phase 5)

Bulk Barn is the largest anchor in a cluster of retail stores in this leg of the mall. This site imagines a 4-storey streetwall, with a full groundfloor of commercial and potentially some parking tucked in behind the commercial on level 1. There will be 2 storeys of Parking below this site. There will be an additional 3 storeys of parking above the groundfloor commercial but located behind the single loaded residential facade so that it is not visible from the linear courtyard or from the street. This above grade parking will likely be dedicated to all the commercial developments in this project with about 250 parking spaces over the 3 storeys. Access to the parking will be from Woodlawn Road at a location that is at least 100m from the signals at Althorpe. This location will provide access to all 5 levels of parking at this site.

This site will also support two smaller high rise towers (13 storey and 9 storey) stepping down the height from the centre of the development as it borders the single detached residential to the east. Towers are setback from the rear property line by at least 15m to reduce the impacts.

Vogue Optical Site (Phase 6)

This site will be redeveloped to bring the building closer to Woodlawn Road to make the neighbourhood more walkable and to hide the parking in behind the building further separating the new 5 storey building from the single detached residential to the north of the site.

Part or all of the groundfloor could be commercial retail to replace some of the retail lost when the site is redeveloped. We anticipate 1 or two storeys of parking below this new building with potential access from the phase 5 building to the west. This new building will support up to 46 units and 1100 sm of retail.

Planet Fitness (Phase 7)

As the newest lease at Woodlawn Mall, Planet Fitness has invested over \$1m in renovations over a 20 year lease and as such, this site will be the last to be redeveloped in phase 7. This site imagines a 2 storey streetwall podium with a single 7 storey tower near the end of Glen Avenue. There will be 2 storeys of parking below this building with access into the parking garage off the end of Glen Avenue. The future development will support 7- units and about 1800 sm of groundfloor retail.



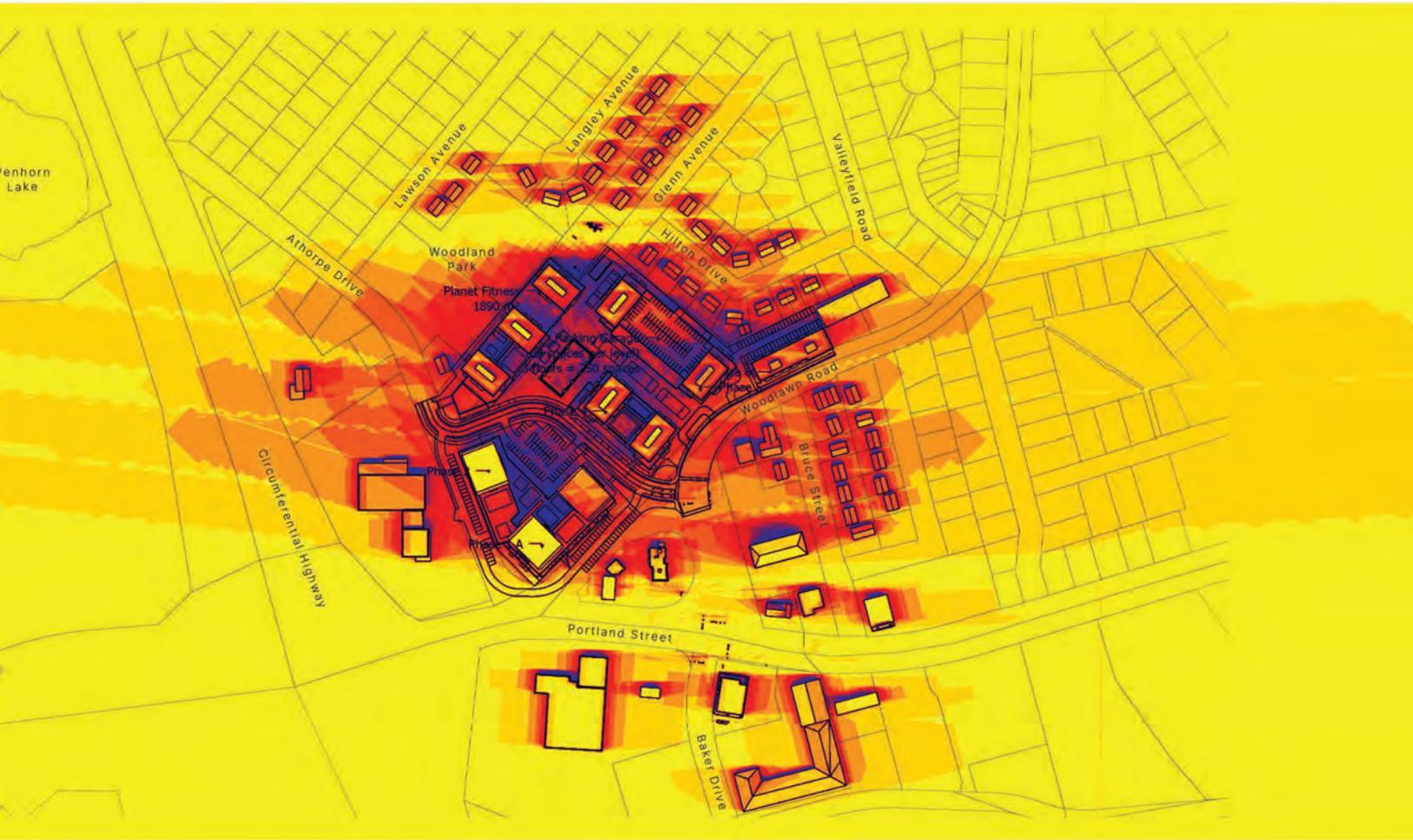
Fig. 11. Phasing Plan

Phasing

The master plan shows 7 phases of construction over the life of the project. These phases consider the existing lease periods of the existing mall tenants with the most recent lease coming due in 2026 for Staples. The Staples site has been broken into 2 phases to allow the existing Staples building to be maintained during the construction of phase 1, and then they can move into a new Staples format once phase 1 is complete. We expect phase 1 will take 3 years to complete and phase 2 will be an additional 2 years. Phase 3 could start at the same time as phase 2 if financing can be secured for both phases 2 and 3. Phase 3 will take 3 years. Each of the consecutive phases will likely take 3 years to complete with a total buildout over the 7 phases of around 20 years. This period works well with existing leases and many of the existing tenants will be given the option of moving into a previously constructed phase

prior to the demonition of their existing facilities once their leases are up. The following is a rough timeline for the phasing and buildout of the project, assuming the planning can be approved by 2026:

Phase	Years to Complete	Year of Completion
Phase 1	3 years	2029
Phase 2	3 years	2032
Phase 3	3 years	2035
Phase 4	3 years	2038
Phase 5	3 years	2041
Phase 6	2 years	2043
Phase 7	3 years	2047



Fathom

Shade Study

A shade study was performed analyzing the hourly shade impacts of the buildings proposed in this development on Sept 21 and March 21 (equinox). The results show that the Penhorn Lake shade protocol area is not impacted by the development. At the same time, many of the R1 homes to the north of the development have little or no shade impacts from the proposed development.

The diagram represents the hourly shade impacts with yellow being the least impacted (no shade impacts) and then a range of colours from orange to red to purple then blue for more significant impacts. The blue areas represent the most shade with almost 12 full hours of shade, the red represent about 5-7

hours of shade, and the orange represents 1-3 hours of shade per day.

Generally speaking, only a few homes on the south side of Hilton Drive and a few homes on Bruce Street are impacted by the development for more than a few hours a day.



Fig. 12. Pro Forma Buildings

Plan Proforma

The master plan shows a cluster of 5 buildings phased over 7 phases of construction. Some of the clusters contain multiple towers of 2 or 3 towers per cluster.

The plan includes a total gross floor area (excluding parking) of 182,437 m² which is broken down into a residential GFA of 162,686 m² and a commercial GFA of 19,751 m².

Assuming an average unit size of 80m², the total number of units in the development is about 1670 units. Each unit will include a minimum of 7 m² of amenity space which includes a minimum of 40% indoor amenity space in each building. The remaining amenity space will use outdoor space, rooftop space

and patio spaces to meet the requirement. The Floor area ratio for the entire development will not exceed 4.4 and the density of the development is about 162 units per acre. These figures are consistent with other urban mall redevelopments in HRM.

Total GFA	182,437 m ²
Total RES GFA	162,686 m ²
Total Commercial GFA	19,751 m²
Res Plate Efficiency	82%
Avg Unit Size	80 m ²
Total Units	1667
Total Lot Area	10.30 acres
Density	161.8 UPA
Surface Parking	165 no.
Parking Garage	1,400 no.
Total Parking	1,565 no.
Parking Ratio	0.9
FAR	4.4

Fig. 13. Development Pro Forma

Phase 1 - Front of Staples

Building	Total Storeys	Parking	Commercial		Lowrise (6-storeys)			Towers			Total Res GFA (m ²)	Res Units	Height (m)
			Storeys	Total GFA (m ²)	Storeys	Lowrise Plate (m ²)	Lowrise GFA (m ²)	Storeys	Towers Plate (m ²)	Highrise GFA (m ²)			
Underground Parking	-2												
A	17		2	3,168	5	1,799	8,995	10	910	9,100	18,095	185	52.5
B	29		1	268	5	1,379	6,895	23	910	20,930	27,825	285	88.5
Total				3,436			15,890			30,030	45,920	470	

Total GFA **49,356**

Phase 2 - Staples

Building	Total Storeys	Parking	Commercial		Lowrise (6-storeys)			Towers			Total Res GFA (m ²)	Res Units	Height (m)
			Storeys	Total GFA (m ²)	Storeys	Lowrise Plate (m ²)	Lowrise GFA (m ²)	Storeys	Towers Plate (m ²)	Highrise GFA (m ²)			
Underground Parking	-2												
C	22		1	1,530	5	2,218	11,090	16	910	14,560	25,650	263	67.5
Total				1,530			11,090			14,560	25,650	263	

Total GFA **27,180**

Phase 3 - Giant Tiger

Building	Total Storeys	Parking	Commercial		Lowrise (5-storeys)			Towers			Total Res GFA (m ²)	Res Units	Height (m)
			Storeys	Total GFA (m ²)	Storeys	Lowrise Plate (m ²)	Lowrise GFA (m ²)	Storeys	Towers Plate (m ²)	Highrise GFA (m ²)			
Underground Parking	-2												
D	17		1	3,233	4	2,416	9,664	12	760	9,120	18,784	193	52.5
E	13						0	8	760	6,080	6,080	62	40.5
Total				3,233			9,664			15,200	24,864	255	

Total GFA **28,097**

Phase 4 - Harveys

Building	Total Storeys	Parking	Commercial		Lowrise (5-storeys)			Towers			Total Res GFA (m ²)	Res Units	Height (m)
			Storeys	Total GFA (m ²)	Storeys	Lowrise Plate (m ²)	Lowrise GFA (m ²)	Storeys	Towers Plate (m ²)	Highrise GFA (m ²)			
Underground Parking	-2												
F	16		1	3,377	5	2,562	12,810	10	760	7,600	20,410	209	49.5
G	26						0	20	760	15,200	15,200	156	79.5
Total				3,377			12,810			22,800	35,610	365	

Total GFA **38,987**

Phase 5 - Bulk Barn

Building	Total Storeys	Parking	Commercial		Lowrise (5-storeys)			Towers			Total Res GFA (m ²)	Res Units	Height (m)
			Storeys	Total GFA (m ²)	Storeys	Lowrise Plate (m ²)	Lowrise GFA (m ²)	Storeys	Towers Plate (m ²)	Highrise GFA (m ²)			
Underground Parking	-1												
H	13		1	5,230	3	2,664	7,992	9	760	6,840	14,832	152	40.5
I	10						0	6	760	4,560	4,560	47	31.5
Total				5,230			7,992			11,400	19,392	199	

Total GFA **24,622**

Phase 6 - Vogue

Building	Total Storeys	Parking	Commercial		Lowrise (5-storeys)			Towers			Total Res GFA (m ²)	Res Units	Height (m)
			Storeys	Total GFA (m ²)	Storeys	Lowrise Plate (m ²)	Lowrise GFA (m ²)	Storeys	Towers Plate (m ²)	Highrise GFA (m ²)			
Underground Parking	-1												
J	5		1	1,125	4	1,125	4,500				4,500	46	16.5
Total				1,125			4,500			0	4,500	46	

Total GFA **5,625**

Phase 7 - Planet Fitness

Building	Total Storeys	Parking	Commercial		Lowrise (1-storey)			Towers			Total Res GFA (m ²)	Res Units	Height (m)
			Storeys	Total GFA (m ²)	Storeys	Lowrise Plate (m ²)	Lowrise GFA (m ²)	Storeys	Towers Plate (m ²)	Highrise GFA (m ²)			
Underground Parking	-1												
K	1		1	1,820				6	1,125	6,750	6,750	69	4.5
Total				1,820			0			6,750	6,750	69	

Total GFA **8,570**



Fig. 14. Open Space Plan

Open Space

The master plan includes over 8,000 m² (2 acres) of open space which represents almost 20% of the 10.3 acre site area. This space is intended to be woned and managed as private open space rather than as parkland dedication. The open space connects the end of Glen Avenue to the centre of the development. Currently, this end of the street terminates in the back of the mall but it is psoposed to extend through to the cenrre of the ruban space creating a courtyard into the development and a proper terminus for the street. This area will likely include collapsable bollards so that temporary access for vehicles can be secured for vehicles during certain events.

Urban Plaza

The Main urban plaza is a large central space designed

for year round events including outdoor markets, small performances, skating in the winter, fountains and splash pads, specialty lighting and seating around the edges, and a host of other facilities for special events. This area is over an acre in size, and will contain a mix of softscapes and hardscapes to allow for flexible programming. The urban plaza will be completed when buildings D-G are completed.

Linear Courtyard

The linear courtyard is 24-28m wide space with groundfloor commercial on both sides. This leanr space will be programmed for seating and smaller event spaces. It will be lined with small flowering trees to provide a shade canopy and will have ample seating and lighting.



Fig. 15. Glen Avenue Courtyard connection to the Urban Plaza



Fig. 16. Main Urban Plaza looking back at the Linear Courtyard



Fig. 17. Linear Courtyard looking towards Woodlawn Road



Fig. 18. Linear Courtyard looking north from the drop off area on Woodlawn Road



Splashpad
and Outdoor
Skating Area

Fig. 19. Linear Courtyard and Urban Plaza looking south



Splashpad
and Outdoor
Skating Area

Fig. 20. Main Urban Plaza with realigned Althorpe in the foreground.

▲ Underground Parking Entry

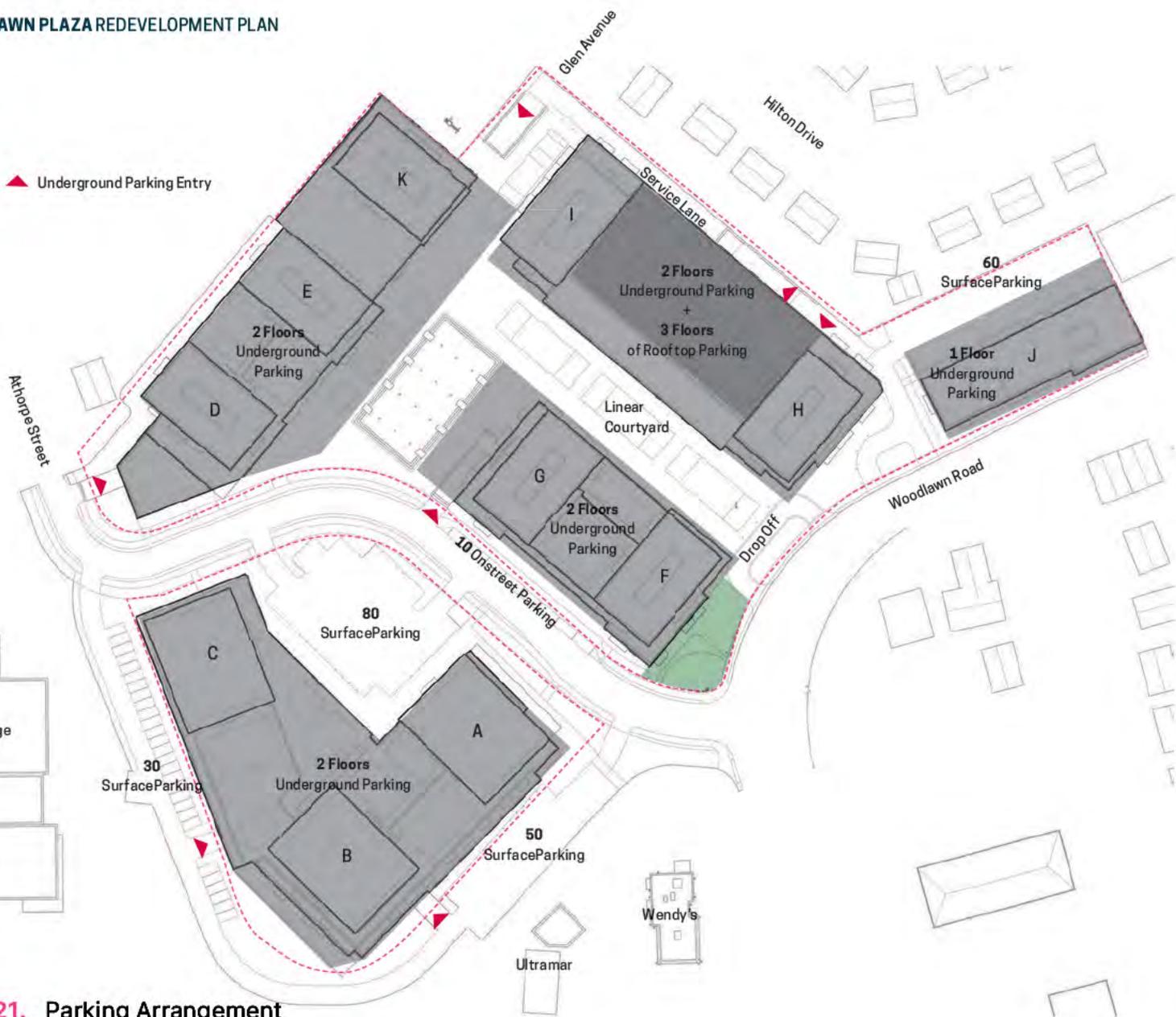


Fig. 21. Parking Arrangement

Parking

With excellent transit and At service, this development is considered a “Transit Oriented Development” (TOD) and will not require typically high parking ratios. Most urban developments in HRM require 1-1.3 parking ratios (the number of parking spaces per unit), but in the case of this development, we anticipate a substantially reduced parking demand in the range of 0.6-0.9, making the development substantially more affordable. The significant groundfloor commercial in the development (upwards of 19,700m² or 210,000 sf) will require approximately 3 spaces per 1,000sf or about 650 spaces dedicated to commercial.

Most of the parking will be located underground (shown in grey above), or in the case of buildings H and I, there is an opportunity for 3 storeys of rooftop park-

ing above the groundfloor commercial, solely dedicated to commercial parking.

The underground parking entries are distributed throughout the development so that traffic in and out of the each building is distributed on the surrounding street networks including Woodlawn Road, Althorpe, and Glen Avenue. Parking entries are shown in red triangles on the plan.

The plan also shows some onstreet parking on Althorpe to reduce vehicle speeds and provide some sidewalk buffering for pedestrians.

A few other smaller surface parking lots are shown to make the groundfloor commercial feasible. Most retailers require some visible and accessible parking as a contingent lease requirement.



Fig. 22. Building Height and Streetwall Height. Tower height noted excludes streetwall height.

Building Height

The buildings range in height to create a diverse skyline but generally the heights step down to the neighbourhoods to the north of the site. The heights have been strategically designed to reduce shadow impacts on the surrounding single detached homes to the north and east of the site.

The tower heights represent sum of the midrise plus the high rise so that Building B, the total height is 28-storeys (5 midrise plus 23 highrise). Towers B and G are the tallest in the development at 28 and 25 storeys respectively.

The maximum tower plate in the development is 1125 m² with taller towers reducing in plate size to 910 m² and 760 m². These result in more slender

towers that reduce the wind and shadow impacts. All towers will have a base, middle and top to provide vertical articulation to the tower forms. The minimum tower separation will be 23 m though most towers have a greater separation.

Streetwall Height

Every street front will have a midrise streetwall with a minimum setback of 4m. There will be some internal setbacks as well to reduce the impact of the tower downdraft wind on the surrounding public spaces. Streetwalls must encompass no less than 70% of the streetwall. The streetwall heights range from 2 to 5 storeys with lower heights as the buildings get closer to the north side of the site near the single detached homes.



Fig. 23. Building Massing looking north



Fig. 24. Building Massing Looking East



Fig. 25. Building Massing looking south



Fig. 26. Building Massing west from Portland Street



Fig. 27. Rendering from Woodlawn Road into the newly realigned Althorpe



Woodlawn Centre



Fig. 28. Rendering from the newly realigned Althorpe from the Staples site



2.3

Development Pathways

Rezoning Pathway

The land is currently zoned as C-3 which permits all “C-2 uses as herein set out, excepting therefrom any residential uses”. The C-2 zone permits R-3 uses which allow multi-family developments by development agreement. The “Commercial” chapter of the MPS sets out more traditional commercial uses, but allows for site specific mixed use developments in areas like Main Street, the Penhorn Mall site, Waverley Road, etc. MPS amendments are currently frozen until the Suburban Plan is released so there is no opportunity to create a site specific mixed use residential development on C-3 zoned land for the Woodlawn Mall site.

We believe there may be an opportunity for a simple zoning change to remove the “excepting therefrom any residential uses” from the C-3 zone. Of course this change would apply to other C-3 zoned properties in Dartmouth but there is only a handful of these properties mostly along Portland Street that would apply. From a policy perspective, there is no policy specifically restricting mixed use development in the Commercial chapter of the MPS, so we don’t believe there is a need for a plan amendment to implement this zoning wording change to the C-3 Zone in the LUB. From a land use and market feasibility perspective, many old shopping mall sites like Woodlawn Mall are advancing mixed use developments like the one proposed in this report, so many municipalities are moving away from single use commercial zoning in favour of mixed use zoning that requires groundfloor commercial uses with the opportunity for upper storey residential above.

Rapid Transit Plan

The Rapid Transit Strategy (May 2020) established 5 BRT corridors including the Red line which extends

along Portland Street close to Woodlawn Mall. Figure 37 of the RTS identifies Woodlawn Mall as a potential Transit Oriented Community. Policy 5.4 of the RTS sets out that:

“The highest mixed-use densities should be directed to areas within 400 metres of Rapid Transit stations, with moderate densities up to 800 metres. This approach will support the Rapid Transit Network by encouraging the development of compact, complete communities served by frequent transit, allowing people to work, shop, and play close to where they live.”

The Woodlawn site is within 400 metres of a rapid transit station along the Portland Red Line. It is our understanding that this policy will eventually be implemented into the regional plan and then down to the regional centre plan MPS/LUB in future amendments.

Growth Area Pathway

Growth areas like Bedford Common, Exhibition Park, Micmac Mall, Strawberry Hill, Lake Loon/Golfview Drive are special areas within the serviceable boundary of HRM that have been identified for growth that require a special type of development agreement submission format (land suitability analysis) to establish the highest and best use and arrangement of land uses and roads within a larger site. To our knowledge, there are no regional plan policies or MPS policies that establish what lands can be considered for a Growth Areas. Initially, our team had been working towards a Growth Area pathway for Woodlawn Mall, but that option seems to have fallen off the table during our last meeting. We believe this pathway is the most suitable one to address the range of issues that would arise from this redevelopment.

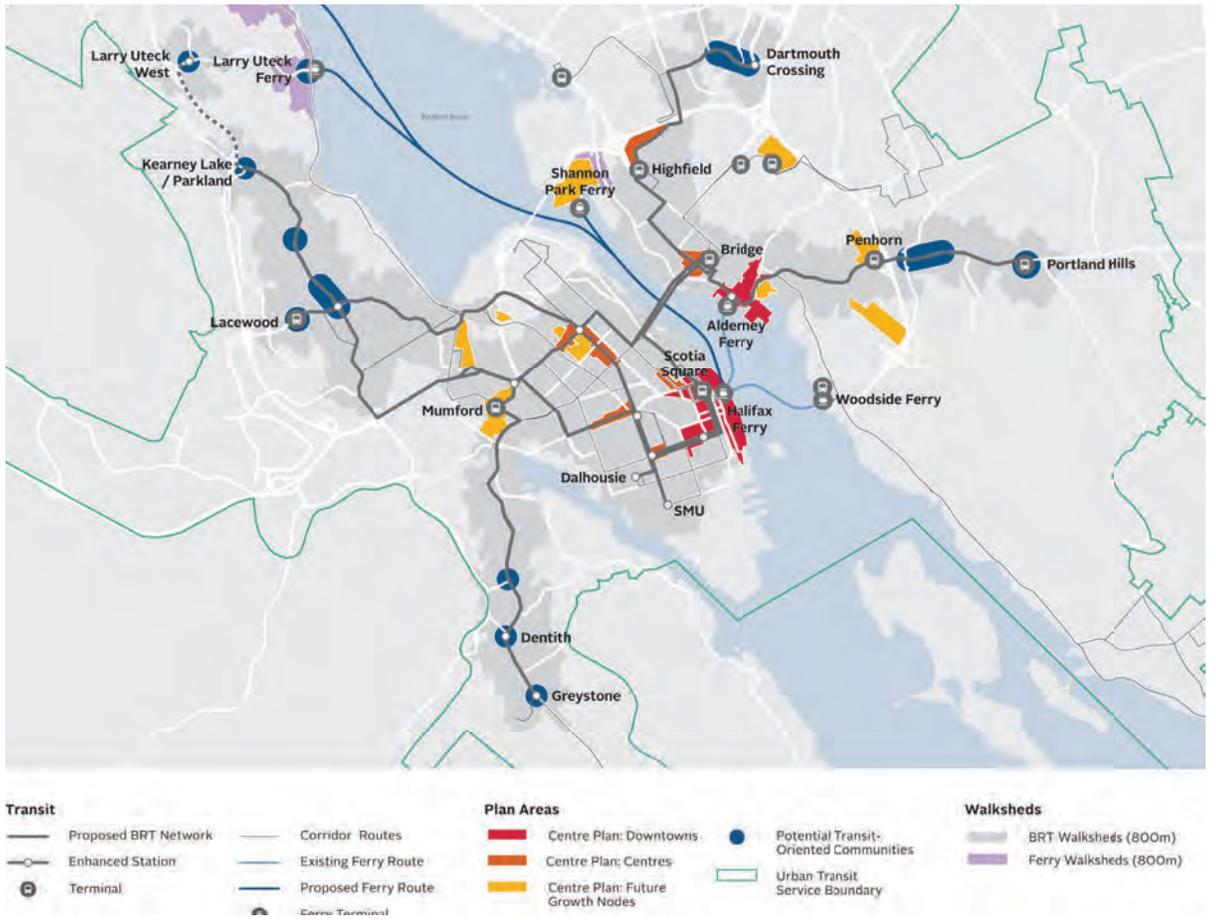


Fig. 29. Figure 37 of the RTS : Rapid Transit walksheds with Regional Centre growth areas and potential transit-oriented communities



Fig. 30. Red Line Map of the RTS showing Woodlawn as a 2-way standard station close to the Penhorn Station.

Special Planning Area

The province could designate these lands a special planning area that would require HRM to consider this development through a development agreement. The owners have been looking into this option in discussions with the province, but obviously we would prefer to find a pathway that works for HRM.

The Need for a Pathway

We require some assistance from HRM in determining the most viable pathway to advance this file expeditiously. As part of this pathway, we also require more detailed submission requirements so we can formally submit an application.



Amendments to Halifax Charter's Minimum Planning Requirements

Minimum Planning Requirement	Public Health Comments
<p>(a) Housing Supply Priority include a statement of policy that expressly recognizes that the Province and, in particular, the Municipality are experiencing a housing shortage crisis and specifies that the most urgent priority in municipal land-use planning, regulation and development approval is to rapidly increase the supply of housing in the Municipality;</p>	<p>Public Health recognizes the urgent need to expand the housing supply. From a population health perspective, it will be important to balance the urgency to build housing without sacrificing the value of a) meaningful community engagement; b) complete community planning; and, c) protected park and natural areas. These principles are critical to supporting community health and health equity.^{1 2} Without balancing these priorities there is risk that development will lead to car-dependent communities that do not support active lifestyles, and the loss of green spaces critical to mental well-being.</p>
<p>(e) Suburban Plan Implementation of a land-use by-law for the area of the Municipality identified as the suburban area on the map attached as Appendix A, or a substantially similar area, no later than January 31, 2025 (<i>now extended to June 30, 2025</i>)</p>	<p>Public Health supports HRMs approach to undertake a comprehensive planning and community engagement process in developing the Suburban Plan.</p> <p>Public Health recognizes the urgent need to expand the housing supply, however without meaningful engagement to inform planning in the suburban area there is risk of negative community health consequences for decades.³ Many studies highlight the importance of meaningful community engagement to support healthy community planning and decision-making.^{4 5 6} A risk of fast-tracking engagement and planning processes is that the input and needs of equity deserving communities are overlooked resulting in further marginalization and health inequity.</p>
<p>(h) Unit Mix For residential buildings that begin construction before April 1, 2027, provide that no requirement related to unit mix applies;</p>	<p>Larger multi-bedroom apartments/condominiums, while less attractive for developers, are essential housing options for families. Removing existing requirements for a specific number of 1, 2, 3+ bedroom units in residential buildings risks negatively impacting families by reducing their options for affordable and appropriate housing.</p> <p>Halifax has one of the fastest growing downtowns in Canada.⁷ Newcomer families often rent upon arriving in Canada. Additionally, families in general are increasingly choosing to</p>

	<p>raise children in compact walkable communities, which promotes healthier lifestyles and preserves ecosystem health by minimizing the need for greenfield development. Furthermore, future generations are more likely to live in multi-unit buildings across all life stages.⁸ Failure to accommodate a range of families’ needs in the design and delivery of multi-unit housing now will have significant consequences for the future success of compact cities.⁹</p> <p>Public Health supports maintaining the dwelling unit mix provisions within HRMs Regional Centre Land Use Bylaw and the extension of these provisions to Suburban Plan areas.</p> <p>Other Canadian municipalities have gone further with unit mix policies. In New Westminster, a Family Friendly Housing Policy promotes a balance of unit mix and sizes, ensuring that residential developments include sufficient homes for families. Rental projects with 10 units or more are required to include a minimum of 30% two- and three-bedroom units, with at least 10% of total units containing three- or more bedrooms. Ownership projects with 10 units or more are required to include a minimum of 40% two and three-bedroom units, with at least 15% of total units containing three- or more bedrooms.¹⁰</p>
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References

- ¹ Mitchell, R., Richardson, E., Short, N. & Pearce, J. (2015). Neighborhood environments and socioeconomic inequalities in mental well-being. *Am J Prev Med.* 49(1): 80-4.
- ² [World Health Organization, & Secretariat of the Convention on Biological Diversity. \(2015\). Connecting Global Priorities: Biodiversity and Human Health. WHO Press, June 2017. https://doi.org/10.13140/RG.2.1.3679.6565](https://doi.org/10.13140/RG.2.1.3679.6565)
- ³ Miller P. (2018). Health Impacts of Suburban Development Patterns. *Delaware Journal of Public Health.* 11;4(2):32-35. doi: 10.32481/djph.2018.03.007.
- ⁴ Kim, Minji Olivia, et. Al. (2023). “Supporting healthy community decision-making in municipalities: A synthesis of evidence-informed resources from across Canada”. *Wellbeing, Space and Society*, Volume 5, Article 100180. <https://doi.org/10.1016/j.wss.2023.100180>.

⁵ Giles-Corti, Billie, et. Al. (2016). “City planning and population health: a global challenge”. *The Lancet*, Volume 388, Issue 10062.

[https://doi.org/10.1016/S0140-6736\(16\)30066-6](https://doi.org/10.1016/S0140-6736(16)30066-6).

⁶ Rosen, J., & Painter, G. (2019). “From Citizen Control to Co-Production: Moving Beyond a Linear Conception of Citizen Participation”. *Journal of the American Planning Association*, 85(3), 335–347. <https://doi.org/10.1080/01944363.2019.1618727>

⁷ Canada's large urban centres continue to grow and spread. <https://www150.statcan.gc.ca/n1/daily-quotidien/220209/dq220209b-eng.htm>

⁸ Sophie-May Kerr. (2024). “[Planning for the inclusion of families with children in apartments](#)”, JMI Policy Insights Paper (2024).

⁹ *ibid.*

¹⁰ City of New Westminster. [Family Friendly Housing Policy, November 2024](#).



"for the use of the inhabitants of the town of Halifax as Common forever" (1763-2025)

Feb 24, 2025

Re: Minimal Planning Requirements submission

Please include the following comments on behalf of the Friends of Halifax Common.

We do not support any of the changes proposed under the province's Minimal Planning Requirements* for a variety of reasons:

Undemocratic: There has been no legitimate democratic process for public information, understanding or engagement. An on-line survey does not a city plan make. Residents of HRM have engaged for years to help regulate planning undertaken in the Centre Plan. Everyone may not agree but the outcome sought is a balance between public and private interests. These quick and reckless changes to HRM planning in addition to the recent HAF Centre Plan amendments are meant to further shut communication between residents and government, in this case with the majority of the public being totally unaware.

Planning Must be Strategic: Where and how development occurs should be integrated with infrastructure needs (roads, sewage, water); social needs (public transportation, schools, hospitals, fire & police, libraries, community centres, public open space, recreational centres) and commercial needs (food, services and other necessities). Complete communities also need thoughtful planning for inclusivity, all ages, all abilities. The proposed changes are haphazard and only about buildings, not how these mesh or integrate within what exists or who lives there. They dismantle present agreed upon rules, checks and balances. HRM plans must continue to regulate requirements for the number of bedrooms, amount of commercial space, number of parking spaces and seek a balance between housing requirements and other municipal needs. Any changes should be fully deliberated upon by citizens.

So, if the Centre Plan is inadequate, when is the formal review period? There are areas that need to be strengthened. Here are a few examples:

Climate Crisis: All planning must place the climate crisis front and centre. We know we need to stop emissions. Therefore we must stop emissions now, not at some future imaginary time. Buildings are responsible for approximately 40% of our greenhouse gas emissions. We are at a point in economic, social, cultural precarity where we cannot waste what we have and where we must take greater care with what we have. When

will HRM's Centre Plan require a carbon budget for all buildings? Why isn't this already an aim to have all new buildings be **carbon negative** (removing carbon from the atmosphere) or **carbon positive** (storing and producing more energy on site than the building requires and feeding it into the grid)? When will HRM's Centre Plan examine the relationship between building height and embodied carbon

Halifax Common, Public Open Space and Urban Forest: As HRM densifies the urban core there is ever greater use of existing public open space and need for more. Working with nature is an imperative for dealing with extreme weather. It is also vital to the physical and mental health of citizens. How and where does HRM plan new public green space-especially on the Peninsula? Why is HRM secretly planning for a stadium for a private corporation on the Wanderers Block outside of the planning process for the Halifax Common Master Plan, without any public consultation or financial analysis?

Cumulatively the development of towers around the Halifax Common impacts the available space not just by increased use but also from more shadow and wind. On private lands, mature hardwood trees are regularly cut for developments that once built have no public open space or landscaping requirements. This is especially true of streetscapes surrounding the Halifax Common where hardedge is the urban fashion but an eco-enemy: increasing heat island effect, reducing soil porosity; eradicating habitat. Public land is as vulnerable. The city's plans for Robie Street widening and bike lanes on the Halifax Common's University Avenue Boulevard regard trees as obstacles to be removed. Where is the protection for existing urban green space and trees?

Demolitions, Vacant and Public Land: Leading up to and post Centre Plan HRM has issued demolition permits to destroy thousands of affordable residential units. This is unnecessary as according to HRM staff there are 12,000 vacant lots within HRM. Demolitions also impact the climate as unnecessarily replace existing floor area unnecessarily uses materials and the energy along with the emitted GHGs to produce, transport and install these. How does HRM intend to regulate demolitions, protect existing housing, and require affordable housing (with a definition for what is 'affordable') in new buildings? How does HRM intend that empty land must be prioritized for development over any new demolitions? What is the lesson from the loss of Bloomfield, St Pat's Alexandra and St Pat's High Schools that HRM will take? Each sale is a betrayal of public trust and community interest. Will HRM plan for public land such as Cogswell and Shannon Park to be used for public purpose- family, social and affordable housing?

Building Scale: A scientific research paper I wrote "[Buildings for the Climate Crisis – A Halifax Case Study](#)" -uses preliminary assessments of GHGs associated with the demolition of existing low rise buildings and compares these to mid-rise and to high-rise for the Carlton Block development. It determined that the taller the building, the disproportionately greater the upfront/embodied carbon per square measure. That's from energy used for materials and products used in their construction such as concrete, steel, glass, aluminum. Taller buildings also use more operational energy per square measure (heating, lighting, cooling).

Other published papers by other authors underscore these findings.

Decoupling density from tallness in analysing the life cycle greenhouse gas emissions of cities, from a team led by Frances Pomponi, examines four basic urban typologies with a Life Cycle Emissions and Population Summary. It finds, High Density Low Rise (HDLR) has less than half the Life Cycle GHG Emissions (LCGE) per capita of High Density High Rise (HDHR) buildings.

High-Rise Buildings: Energy and Density by Professor Philip Steadman of UCL sets out existing evidence on density and energy use on built form and density. It describes mathematically how Courtyards are the best, Crosses next, and Towers are only the THIRD best form for density.

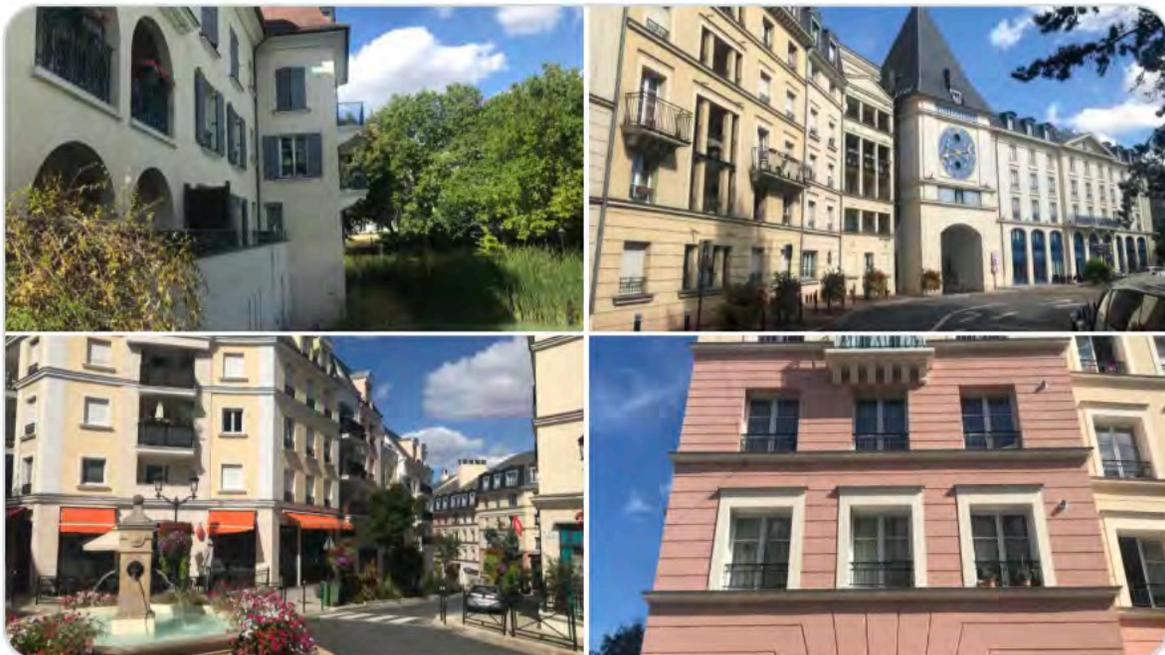
My report has many examples of smaller scale infill, add-ons to existing buildings. Why does the Centre Plan not regulate the built form so as to maximize density but minimize greenhouse gas emissions? Many cities are successful adding density in 4-6 storeys that compliments existing architectural style. Below are images of recent examples from Paris and Vancouver, including affordable units. Meantime until there is a formal, fully informed and public review process for the Centre Plan to determine what is working and what needs to be changed, none of the proposed changes* should be approved.

Best wishes,
Peggy Cameron
Friends of Halifax Common

createstreets  @createstreets · Feb 9

British developers, politicians & officials are entirely unaware of the sheer quality, traditional beauty & popular appeal of Paris's new suburbs, tripling density, respecting local preferences, creating sustainable new Gentle Density in communion with past, present & future.





Bryn Davidson @Lanefab @Lanefab · 2h

Why 'single lot'?

1. you don't have to compel adjacent owners to sell by offering much higher land prices vs what you might pay for a single lot
2. existing owners can develop with existing lower land cost
3. You get a mix of building types and ages
4. Change is incremental



Bryn Davidson @Lanefab @Lanefab · 20h

Happy Halloween!

Here are some spooky single lot, single stair buildings.

3 to 6 storeys, 6 to 24 units. ...

[Show more](#)



*The following proposed changes should NOT be approved.

- + Removing the bedroom count requirements until April 1, 2027. (i.e. the municipality can no longer require 2 or 3 bedroom units)
- + Removing on-site parking for residential uses within the Urban Service Area.
- + Reducing the amount of commercial space on the ground floor of a building until April 1, 2027.
- + Allowing temporary housing on or near construction worksites.
- + Allowing converted shipping containers as a dwelling or backyard suite.
- + Making housing a priority over other interests identified in the municipal planning strategy
- + Providing alternative density calculations for Conservation Design Development projects until April 1, 2027.
- + Convert height from metres and feet to storeys for apartments with more than 4 units.

February 24, 2025

Planning & Development Office
Halifax Regional Municipality
Via Email: regionalplan@halifax.ca

Subject: Cresco's Feedback on Minimum Planning Requirement Amendments and Request for Inclusion of West Bedford/Subarea 9

To whom it may concern:

On behalf of Cresco, we would like to submit our feedback on the proposed amendments to the minimum planning requirements, along with a request for specific considerations regarding West Bedford/Subarea 9.

Feedback on Proposed Amendments:

- 1. Priority on Safe, Sustainable, and Affordable Housing (Section B)**
Cresco supports the requirement to prioritize safe and sustainable affordable housing in Halifax Regional Municipality's planning and decision-making processes. Additionally, Cresco endorses the establishment of formal mechanisms to expedite approvals, particularly for subdivision and infrastructure development.
- 2. Infrastructure and Information Sharing (Section D)**
Cresco supports Halifax Regional Municipality's initiative to share infrastructure planning data with the province. Improved collaboration at this level is crucial to ensuring the effective deployment of infrastructure to support anticipated population growth.
- 3. Commercial Space Requirement for Multi-Unit Residential Buildings (Section J)**
Cresco supports the reduction of the ground floor commercial requirement for multi-unit residential buildings that begin construction before April 1, 2027, from 100% to a maximum of 20%. While this change may impact some developments, Cresco recognizes the flexibility it provides. Although Cresco has chosen to include commercial space at Ocean Breeze, we understand that it is not a requirement. This amendment may also affect Dartmouth Shopping Centre, and we will assess the potential implications accordingly.

Request for Inclusion of West Bedford/Subarea 9:

In addition to the above feedback, we formally request that the following items apply specifically to West Bedford/Subarea 9:

1. Mixed-Use Development

Cresco advocates for the inclusion of provisions that permit residential uses in all zones, excluding those specifically designated for industrial, military, park, transportation reserve, and utility uses, as well as zones intended to protect the environment and water supply. Allowing mixed-use development on Hogan Court would align with Halifax Regional Municipality 's housing goals and optimize the use of commercial parcels in the area.

2. On-Site Parking Requirements

Cresco proposes that there be no requirement for on-site parking for residential uses within the urban service area. This flexibility would support more efficient land use and enhance the feasibility of developing mixed-use residential and commercial buildings, particularly in West Bedford.

We believe these changes will greatly contribute to meeting the Municipality's housing objectives while ensuring better utilization of land resources.

Thank you for considering our feedback and request. We look forward to your response and hope for a collaborative approach in advancing these amendments.

Yours Sincerely,

Cresco

40 King St.
Dartmouth, NS
B2Y 2R4

902-461-2525

Principal Planner
REGIONAL PLANNING TEAM | PLANNING & DEVELOPMENT
Halifax Regional Municipality

February 24, 2025

Minimum Planning Requirement Amendments Feedback

Dear HRM Regional Planning team,

This letter outlines our, Fathom Studio's, response to the Province of Nova Scotia's amendments to Halifax Charter's Minimum Planning Requirements. We appreciate the opportunity to get involved and provide feedback. As a local architecture and planning firm, changes to HRM planning documents greatly impact our work as the majority of our projects are located within the Municipality. As practitioners dedicated to thoughtful urban design, sustainable development, and community-focused planning, we recognize the importance of establishing clear and effective policies that will guide Halifax's future growth. In this letter, we offer our comments on each of the proposed requirements, identifying opportunities and potential refinements to support a well-balanced and forward-thinking regulatory framework.

Minimum Planning Requirements:

(a) include a statement of policy that expressly recognizes that the Province and, in particular, the Municipality are experiencing a housing shortage crisis and specifies that the most urgent priority in municipal land-use planning, regulation and development approval is to rapidly increase the supply of housing in the Municipality;

HRM Approach: Include policy intent in the Regional Plan to increase housing supply.

Comments: We have no specific comments on this requirement at this time.

(b) require that priority be given to increasing the supply of safe, sustainable and affordable housing in the Municipality over other interests identified in the municipal planning strategy for the purposes of all processes, approvals and decisions made under the municipal planning strategy;

HRM Approach: Include policy intent in the Regional Plan to increase safe, sustainable and affordable housing.

Comments: We have no specific comments on this requirement at this time.

(c) permit residential uses in all zones, except for all of the following:

(i) areas zoned for industrial, military, park, transportation reserve and utility uses,

(ii) zones intended to protect the environment, water supply, floodplains or

another similar interest;

HRM Approach: Include policy intent in the Regional Plan, but no changes to land use by-laws proposed at this time. Future changes may happen through other planning projects such as the upcoming Suburban Plan.

Comments: We support the intent of Policy (c) to permit residential uses in all zones, except in specific areas designated for industrial, environmental, and other non-residential uses. However, we believe that restrictive interpretations of existing municipal policies, such as Policy H-3A in the Dartmouth Municipal Planning Strategy (MPS), prevent residential development in areas where it should otherwise be allowed, and we believe that this is an opportunity to highlight this matter.

A clear example of this issue is the Lake Loon Lands, where our recent Development Agreement (DA) submission was rejected due to an interpretation of Policy H-3A, which states:

“Prior to considering any agreement within a CDD, Council shall require a concept plan for the entire land holding.”

This policy was originally written for the Lancaster Ridge CDD and was not intended for the Lake Loon CDD, which did not exist at the time. However, HRM staff have interpreted it to mean that all landowners within the Lake Loon CDD must submit a single, coordinated master plan and Land Suitability Assessment (LSA) as a joint application. This approach creates significant barriers to housing development, particularly because many landowners in the CDD are small property owners—such as a single-family homeowner with a 7,500 sq. ft. lot—who have no interest in participating in this complex and costly process. Additionally, most of these landowners have direct street frontage and do not rely on a shared development framework for access or servicing.

As a result, despite the broader goal of Policy (c) to expand opportunities for residential development, the interpretation of Policy H-3A is effectively preventing it. To better align with Policy (c), we request that Policy H-3A be amended to remove the requirement for a concept plan covering “the entire land holding.” Alternatively, HRM should adopt a more flexible interpretation of the policy that allows individual landowners to submit their own LSAs and master plans for their respective properties.

Aligning the implementation of Policy H-3A with the intent of Policy (c) would remove unnecessary barriers to housing development while still ensuring thoughtful and coordinated planning.

(d) require that the Municipality share with the Province the information used by the Municipality to identify, fund, schedule and deploy the infrastructure to develop an adequate supply of housing to support anticipated population growth;

HRM Approach: Include policy intent in the Regional Plan to share information with the Province.

Comments: We have no specific comments on this requirement at this time.

(e) provide for the adoption of a secondary municipal planning strategy and the implementation of a land-use by-law for the area of the Municipality identified as the suburban area on the map attached as Appendix A, or a substantially similar

area, no later than January 31, 2025;

HRM Approach: A revised work plan for the Suburban Plan is expected to come forward in Spring 2025.

Comments: The suburban plan is taking far too long, and the continued delays in the Suburban Plan process present significant challenges for development. With the latest HRM work plan pushing its timeline into Spring 2025, there is no clear end in sight, and the lack of progress has effectively stalled projects in suburban areas.

Compounding this issue is HRM's decision to halt all plan amendments until the Suburban Plan is finalized. This restriction places unnecessary constraints on development, preventing much-needed housing and infrastructure projects from moving forward. If meaningful progress is not made on the Suburban Plan in the near future, we strongly urge HRM to lift the restriction on plan amendments to allow critical projects to proceed.

(f) for developments enabled under the Municipality's Conservation Design Development policies in the Regional Municipal Planning Strategy that begin construction before April 1, 2027, determine the maximum density of a development based on a lot's gross area and not on its net area;

HRM Approach: Adjust Regional Plan policy to provide alternative density calculations for Conservation Design Development projects until April 1, 2027.

Comments: We support the province's requested change for determining the maximum density of a Conservation Design Development based on a lot's gross area rather than its net area. This approach better reflects the true development potential of a site while ensuring that land conservation objectives are still met.

However, we strongly recommend going a step further by removing the existing unit caps imposed on Conservation Subdivision types. Currently, the CLASSIC model is limited to 100 units per property, while the HYBRID model is capped at 30 units per property. These restrictions severely limit the feasibility of conservation-oriented developments, particularly on large land holdings where a greater number of units could be accommodated while still preserving significant open space.

For example, our Granite Springs project spans over 500 acres and could reasonably support 400 units while adhering to conservation goals. However, due to the existing unit cap, we are restricted to just 200 units across two properties—a limitation that undermines the Province's objectives to increase housing supply while still prioritizing sustainable development.

(g) not impose maximum height restrictions in a manner that negatively affects the density of residential buildings using mass timber or any other construction method;

HRM Approach: Include policy intent in the Regional Plan and adjust land use by-laws to convert height from metres and feet to storeys for medium and high density residential buildings.

Comments: We support the intent of Policy (g) to eliminate maximum height restrictions that negatively impact the density of residential buildings using

mass timber or other construction methods. Converting height measurements from meters/feet to storeys will help address challenges with achieving comparable densities, especially in mass timber buildings with deeper floor/roof structures.

While some zones have already adopted this change, many, like Downtown Dartmouth, still measure height from average grade in meters, which limits the density achievable using mass timber and, thus, feasibility.

Where mass timber construction is in line with the overall municipal and provincial mandates to pursue sustainable initiatives, we advocate for incentives beyond the proposed approach. With the National Building Code of Canada 2020 being adopted by the province on April 1st, 2025, and allowing 12-storey mass timber buildings in some instances (including residential use), it would further benefit the municipality and the province to incentivise mass timber construction by allowing 12 storeys buildings under the tall mid-rise built form.

The current regulations require additional setbacks/stepbacks for the high-rise built form. Once the additional setbacks are applied in zones scheduled for greater height, most projects are moving forward with the permissible taller concrete structures. For example, the Downtown Dartmouth zone is scheduled for 90 meters. Allowing 12-storey mass timber construction following the tall mid-rise regulations could incentivise mass timber construction in instances where taller concrete structures are possible.

Furthermore, project delays are often related to labour shortages. This is notable for the concrete trades as all major cities in Canada are experiencing the housing crisis and are building more residential buildings in response. An incentive for mass timber construction would diversify the construction industry, promote alternative construction methods, and make use of an existing skilled workforce. Additionally, the demand would potentially stimulate a new manufacturing industry in Nova Scotia, an industry closely related to our forestry and resource sector.

This item provides an unprecedented opportunity to achieve both municipal and provincial objectives while also addressing the housing and affordability crisis.

(h) for residential buildings that begin construction before April 1, 2027, provide that no requirement related to unit mix applies;

HRM Approach: Adjust land use by-laws to remove the bedroom count requirements until April 1, 2027.

Comments: The provincial amendments to the Minimum Planning Requirement Regulations (effective October 10th, 2024) noted the changes to be implemented by December 31st, 2024. Understanding the complexity of implementing such a task within this timeframe, the delay has nonetheless resulted in projects being held back. The situation is further complicated by upcoming building code changes.

Fathom is working on multiple projects that are adhering to this change with the intent of delivering projects starting construction by spring/summer 2025. They are currently on hold.

The provincial amendments to the Minimum Planning Requirement Regulations (effective October 10th, 2024) noted the changes to be implemented by December 31st, 2024. Understanding the complexity of implementing such a task within this timeframe, the delay has nonetheless significantly impacted ongoing projects.

Fathom is working on multiple projects adhering to this change, intending to start construction by spring/summer 2025. These projects are now on hold.

Further complicating this situation is the upcoming adoption of the National Building Code of Canada 2020 and the Nova Scotia Building Code 2020 on April 1st, 2025, requiring Building Permit applications to be submitted before that date. Without the necessary changes implemented, these projects will face even more significant delays, putting them further out of alignment with the projected timelines for housing delivery. Most of the buildings designed in the fall of 2024 and intended for construction in the spring of 2025 were designed according to the provincial Minimum Requirements. However, we cannot apply for Development Permits since the Regional Center Plan has not amended its regulations.

To address these delays and allow projects nearly ready for construction to proceed, we recommend immediately implementing the regulatory changes. This would allow projects to move forward with their Building Permit applications, thus alleviating the backlog and enabling the delivery of much-needed housing in a timely manner.

(i) provide that no requirement for on-site parking applies to residential uses within the urban service area;

HRM Approach: Adjust land use by-laws to remove on-site parking for residential uses within the Urban Service Area.

Comments: We have no specific comments on this requirement at this time.

(j) for multi-unit residential buildings that begin construction before April 1, 2027, not require that the ground floor consist of more than 20% commercial space;

HRM Approach: Adjust planning documents to reduce the amount of commercial space on the ground floor of a building until April 1, 2027.

Comments: We understand the Province's reasoning for adjusting the requirement for ground-floor commercial space for multi-unit residential buildings to help facilitate housing development.

However, the "before construction" deadline does not account for the lengthy approval process. It can take over a year for a Development Permit (DP), 4-6 months for a Building Permit, and 6-12 for mobilization and site preparation. To ensure projects in the pipeline benefit, we recommend applying this change to projects that receive a DP before April 1, 2027, rather than those that begin construction by that date.

(k) permit temporary housing in non-permanent structures as a use in all zones where it can be safely established to allow employees to live on or near their worksite during a work assignment for a period of time that can be reasonably tied to the duration of the project and that is explicitly set out in the development permit;

HRM Approach: Adjust land use bylaws to allow temporary housing on or near construction worksites.

Comments: We have no specific comments on this requirement at this time.

(I) permit manufactured housing, including modified shipping containers converted into housing, in all residential zones.

HRM Approach: Adjust land use by-laws to allow converted shipping containers as a dwelling or backyard suite.

Comments: We have no specific comments on this requirement at this time.

In closing, we appreciate the opportunity to contribute to this important discussion on the new minimum planning requirements for the Halifax Charter. We hope our insights provide valuable perspectives in shaping a balanced and effective planning framework. We welcome any further discussion and look forward to continued collaboration with the municipality as these policies evolve.

Sincerely,



Rob LeBlanc, Partner, Director of Planning



Chris Crawford, Partner, Director of Architecture



Devin Segal, Partner, Director of Landscape Architecture





February 24, 2025

Halifax Regional Municipality Council
Halifax City Hall

Subject: Lucasville Vision Committee Response to 12 New Minimum Planning Requirements Regulations

Dear HRM Council Members,

The **Lucasville Vision Committee (LVC)** is reaching out to express deep concerns regarding the **Minimum Planning Requirements Regulations** and the potential negative impact these changes may have on our African Nova Scotian heritage community. While we understand the need to address the housing crisis in Halifax, these regulations must not come at the cost of erasing community-led planning efforts, overlooking infrastructure limitations, or disregarding the unique cultural and historical significance of African Nova Scotian communities like Lucasville.

The Need for Community-Led Planning in Lucasville

Lucasville has been working extensively through the **African Nova Scotian Community Action Plan (ANSCAP)** to establish a **Community Action Plan** that reflects the needs, priorities, and long-term vision of our residents. The changes proposed under these new planning regulations directly contradict these efforts, placing the burden of high-density development on small communities without adequate consultation, infrastructure planning, or consideration of the historic displacement of Black communities in HRM.

We are requesting that any changes to development regulations in Lucasville be subject to community approval and align with our Community Action Plan. Our community must retain discretion over what developments are permitted, ensuring that any growth is sustainable, community-driven, and protects our cultural and historical identity.

1. Lack of Community Consultation and Public Engagement

- **No requirement for community-specific consultation:**
 - There is no clear provision that requires direct engagement with African Nova Scotian communities when planning decisions are made.
 - This is especially concerning given past exclusions and systemic barriers to land use planning for Black communities.
- **Advance notification for developments is vague:**
 - The legislation does not outline a process for ensuring communities are informed before development approvals are granted.



- Without this, large developments may continue to be approved without input from residents or consideration for community impact.

2. Shipping Containers as Dwellings & Housing Policies

- **Allowing shipping containers to be used as housing (Section 4A(2)(l)):**
 - While alternative housing solutions are needed, shipping container homes could disproportionately target African Nova Scotian communities as a low-cost, rapid development solution.
 - Without strict quality and safety regulations, this could decrease housing standards in historically marginalized areas while wealthier areas avoid these structures.
- **Prioritization of housing supply over all other interests (Section 4A(2)(b)):**
 - The policy explicitly states that increasing housing supply must take precedence over other community interests.
 - This means concerns about heritage preservation, infrastructure capacity, environmental impact, and road safety could be ignored.

3. Infrastructure and Overdevelopment Without Support

- **No requirement to improve roads, transit, or public services before approving developments:**
 - The legislation does not **require** infrastructure like roads, transit, or emergency services to be upgraded before increasing housing density.
 - Lucasville already struggles with **traffic congestion, lack of sidewalks, and no public transit.**
 - Increased housing density **without infrastructure improvements** will only **worsen safety risks and accessibility issues.**
- **Permitting temporary housing (Section 4A(2)(k)):**
 - The legislation allows **temporary housing for workers**, which could mean **large-scale dormitory-style units** in predominantly Black communities.
 - Without **clear guidelines**, this could lead to overcrowding, poor living conditions, and **exploitation of workers** without long-term community benefits.

4. Environmental and Heritage Concerns

- **No clear environmental impact assessment requirements:**
 - The legislation allows for **rapid housing development** but does not include **mandatory environmental impact studies** before projects are approved.



- This could lead to **flooding, water contamination, and ecological destruction** in areas like Lucasville that have sensitive environmental conditions.
 - **Heritage designation tied to land, not buildings:**
 - While heritage sites are recognized, **the protection applies to the land, not structures**, making it easier for historic Black-owned buildings to be demolished or repurposed.
 - There should be **stronger protections** to ensure historic properties in African Nova Scotian communities **cannot be altered or removed** without a transparent process.
-

5. Zoning and Development Loopholes

- **Residential uses allowed in nearly all zones (Section 4A(2)(c)):**
 - The legislation **overrides traditional zoning rules** by allowing residential development in nearly all areas.
 - This could mean **large-scale developments placed in historic or rural Black communities** with no local say in whether they should proceed.
 - **No limits on building height for mass timber construction (Section 4A(2)(g)):**
 - Developers could **exploit this provision** to build **high-density towers** in historically low-density Black communities, drastically altering their character.
-

6. Governance and Oversight Issues

- **Municipal planning reviews only every 10 years (Section 3(2)):**
 - This timeline is **too long** to ensure planning policies **adapt to community needs**.
 - African Nova Scotian communities should be able to request reviews **on a shorter cycle** to respond to urgent concerns like **gentrification or overdevelopment**.
 - **No clear accountability for development approvals:**
 - There are no safeguards to **ensure municipal planning strategies align with community-led planning efforts**.
 - The African Nova Scotian Community Action Plan (ANSCAP) **should be directly referenced** in any planning affecting African Nova Scotian communities.
-

7. Lack of Protections for Community Growth and Stability

- **No consideration for cultural and economic displacement:**



- The legislation **does not** account for the impact of new developments on existing Black communities.
 - It does not include protections against **property tax increases** or strategies to **prevent longtime residents from being priced out**.
 - **No policy to ensure affordable housing remains in community hands:**
 - While housing supply is a priority, there are no **requirements to prioritize ownership or community-based housing models**.
 - This could lead to **outside developers profiting from low-income housing in Black communities**, reducing local control.
-

Recommendations & Next Steps

To address these concerns, we recommend the following actions:

1. **Stronger Community Consultation Requirements**
 - Require **direct engagement** with African Nova Scotian communities **before** any zoning or housing development approvals.
 - Create a **mandatory notice period and public input process** for developments in historically Black communities.
2. **Stricter Regulations for Alternative Housing (Shipping Containers & Temporary Housing)**
 - Establish **clear quality, safety, and density standards** to prevent poorly built structures in Black communities.
 - Limit the use of **temporary worker housing** in African Nova Scotian areas without long-term benefits for the community.
3. **Infrastructure Before Development**
 - Require **traffic assessments, transit expansion, and road safety improvements** before approving high-density developments.
 - Ensure communities **like Lucasville receive priority investment** in public services before large-scale housing projects.
4. **Mandatory Environmental & Heritage Impact Assessments**
 - All developments should require a **full environmental review** before approval.
 - Strengthen **heritage protections** to prevent historic Black properties from being altered or demolished without oversight.
5. **Community Land Ownership & Affordable Housing Protections**
 - Establish **community benefit agreements** requiring developers to reinvest in the community.
 - Explore land trust models to ensure housing developments **remain affordable and under community control**.
6. **Amend Legislation**
 - We propose an exception is added to the legislation in 4A 2C.
(iii) areas identified as African Nova Scotian Communities.



- Ensure any changes to legislation aligns with African Nova Scotian Communities Community Action Planning.
- This would not exclude these communities from development but ensures any changes are at the discretion of the community rather than developers or HRM mandates.

Final Thoughts

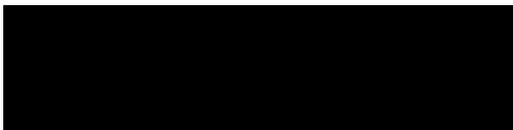
While increasing housing supply is a necessary goal, it must not come at the cost of displacing and destabilizing African Nova Scotian communities. The proposed planning changes prioritize rapid development over community stability, infrastructure, and environmental sustainability. Without amendments, they risk increasing displacement, gentrification, and environmental degradation in communities like Lucasville.

HRM has committed to advancing economic and planning equity for African Nova Scotian communities through **ANSCAP and the Road to Economic Prosperity**. However, these commitments must translate into policy and action. We urge HRM Council to immediately amend the Minimum Planning Requirements Regulations to ensure Lucasville retains control over its own planning and development future.

We welcome further discussions on how to implement these changes in a way that aligns with Lucasville's Community Action Plan, the ANSCAP framework, and HRM's stated commitments to equity and inclusion.

We urge immediate amendments to ensure African Nova Scotian voices are included in planning decisions that will shape our future.

Sincerely,



Devon Parsons
Lucasville Vision Committee

MPR 107 (1 of 3)

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Started February 16, 2025
Petition to [Halifax Regional Municipality](#)

Why this petition matters

Started by [Andrea Hilchie-Pye](#)

[Media inquiries](#)

Halifax Regional Municipality (HRM) and the Nova Scotia government are pushing through [zoning bylaw changes](#) to allow for “an anything-goes approach” to building throughout the city.

The Liveable Halifax Coalition is an alliance of communities and citizens who actively support smart development and densification in HRM. We all recognize that our city is in dire need of affordable housing.

But the unruly approach to densification we’re now witnessing is concerning. Basic checks and balances, to ensure the quality of our urban environment, have been erased from planning reviews.

The breakneck speed of development has already had a negative impact on

- city services
- traffic
- parking
- heritage preservation, and
- green space

What’s worse is that the new zoning bylaws do little to ensure increased levels of affordable housing. City streetscapes are being razed to build apartment towers with rents well over \$2000/month. Relying on a ‘trickle-down effect’ is not a well-grounded planning strategy to ensure that people have the homes they need at a price they can afford.

The changes these bylaws allow will be irreversible. Before our city is damaged beyond repair, we ask that you put in place specific risk-management strategies to

- mitigate potential harms arising from developments;
- mandate real consultation with existing communities before developments are approved;
- address infrastructure pressures;
- ensure public safety with updated evacuation routes; and
- align projects with current strategies such as the Integrated Mobility Plan and the Environmental Protection Plan.

We understand our new mayor and many councillors have expressed concern about unfettered growth. Further, Council has asked the Province for legal protection from potential citizen claims of “constructive taking and de facto expropriation of private property” by allowing such rapid and unchecked development in HRM as a result of the Provincial Regulations.

That’s why the signatories of this petition are asking that zoning bylaws mandate a three-month period of active community engagement and involvement before the approval of any development project. We also ask Council to withdraw this request for legal protection by the Province.



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Media inquiries

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Decision Makers

[Halifax Regional Municipality](#)

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Name	City	Province	Postal Code	Country	Signed On
	Halifax		B3H3g7	Canada	2025-02-16
	St. Catharines		L2M	Canada	2025-02-17
	Burnaby		V5G1n9	Canada	2025-02-17
	Halifax		B3K	Canada	2025-02-17
	Halifax		B3M	Canada	2025-02-17
	Dartmouth		B2W	Canada	2025-02-17
	Halifax		B3H	Canada	2025-02-17
	Halifax		B3J	Canada	2025-02-17
	Brossard		J4W3E8	Canada	2025-02-17
	Brampton		L6V	Canada	2025-02-17
				Canada	2025-02-17
	Halifax		B3H3K8	Canada	2025-02-17
	D'Escousse		B0E	Canada	2025-02-17
	Halifax		B3L1C1	Canada	2025-02-17
	Halifax		B3K	Canada	2025-02-18
	Halifax		B3K	Canada	2025-02-18
	Halifax		B3J 0A3	Canada	2025-02-18
	Halifax		B3H 4C5	Canada	2025-02-18
	Truro		B2N	Canada	2025-02-18
	Halifax		B3H	Canada	2025-02-18
	Halifax		B3K	Canada	2025-02-18
	Halifax		B3M	Canada	2025-02-18
	Barrie		L9X	Canada	2025-02-18
	Scarborough		M1J	Canada	2025-02-18
	Halifax		B3M	Canada	2025-02-18
	Sault Ste. Marie		P6A	Canada	2025-02-18
	St.Peters		B0E3B0	Canada	2025-02-18
	Aurora, Ontario		L4G-1Z9	Canada	2025-02-18
	Halifax		B3K	Canada	2025-02-18

Montreal		H1G	Canada	2025-02-18
Kingston		K7L	Australia	2025-02-18
Halifax		B3S1M5	Canada	2025-02-18
Stewiacke		B0N	Canada	2025-02-19
Halifax		B3N 3H5	Canada	2025-02-19
Dartmouth		b3a 4v1	Canada	2025-02-19
Halifax		B3K	Canada	2025-02-19
Dartmouth		b2y 1t4	Canada	2025-02-19
Halifax		B3H	Canada	2025-02-19
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Halifax		B3J1T9	Canada	2025-02-19
Halifax		B3K	Canada	2025-02-19
Brampton		L6Y	Canada	2025-02-19
Irish Mountain		B3K 1L1	Canada	2025-02-19
Dartmouth		B2Y2Y8	Canada	2025-02-19
Dartmouth		B2Y	Canada	2025-02-19
Windsor, NS		B0N 2T0	Canada	2025-02-19
Halifax		B3J	Canada	2025-02-19
Grand Pré		B0P1M0	Canada	2025-02-19
			Canada	2025-02-19
Edmonton		T6E	Canada	2025-02-19
Halifax		B3M	Canada	2025-02-19
Corner Brook		A2H	Canada	2025-02-20
Halifax		B4A0B1	Canada	2025-02-20
Edmonton		T5Z 0P2	Canada	2025-02-20
Halifax		B3H	Canada	2025-02-20
Halifax		B3J	Canada	2025-02-20

	Dartmouth		B2W	Canada	2025-02-20
	Halifax		B3H 3Y1	Canada	2025-02-20
	Halifax		B3H 2N2	Canada	2025-02-20
	Halifax		B3K	Canada	2025-02-20
	Halifax		B3H	Canada	2025-02-20
	Halifax		B3J	Canada	2025-02-20
	Halifax		B3K	Canada	2025-02-20
	Halifax		B3H4G3	Canada	2025-02-20
	Halifax		B3H 3p2	Canada	2025-02-20
	Halifax		B3N	Canada	2025-02-20
	Halifax		B3H 1J7	Canada	2025-02-20
	Halifax		B3H	Canada	2025-02-20
	calgary		T3E2E	Canada	2025-02-20
	Calgary		T3K1X1	Canada	2025-02-20
	Mississauga		L5M	Canada	2025-02-20
	Halifax		B3T	Canada	2025-02-20
	Halifax		b3H4E5	Canada	2025-02-20
	Halifax		B3M	Canada	2025-02-20
	Halifax		B3J	Canada	2025-02-20
	Bridgewater		B0J1E0	Canada	2025-02-20
	Halifax		B3N 3M4	Canada	2025-02-20
	Halifax		B3H	Canada	2025-02-21
	Halifax		B3K	Canada	2025-02-21
	Halifax		B3K	Canada	2025-02-21
	Dartmouth		B3A	Canada	2025-02-21
	Halifax	Nova Scot	B3H 4G6	Canada	2025-02-21
	Halifax		B3P	Canada	2025-02-21
	Halifax		B3H4E3	Canada	2025-02-21
	Halifax		B3L	Canada	2025-02-21
	Halifax		B3J	Canada	2025-02-21
	Beamsville		l0r1b3	Canada	2025-02-21
	Halifax		B3H	Canada	2025-02-21

Halifax		B3M	Canada	2025-02-21
Halifax		B3L	Canada	2025-02-21
Halifax		B3H	Canada	2025-02-21
Halifax		B3K	Canada	2025-02-21
Halifax		B3K	Canada	2025-02-21
Head Of Jeddore		B0J	Canada	2025-02-21
Timberlea		b3t1g1	Canada	2025-02-21
Halifax		B3K	Canada	2025-02-21
Halifax		B3H	Canada	2025-02-21
Bridgewater		B4V	Canada	2025-02-21
Halifax		B3H	Canada	2025-02-21
Halifax		B3H3X9	Canada	2025-02-21
Halifax		B3M	Canada	2025-02-21
Halifax		B3K	Canada	2025-02-21
Halifax		B0T1S0	Canada	2025-02-21
Halifax		B3M	Canada	2025-02-21
Halifax		B3H	Canada	2025-02-21
Halifax		B3H4K1	Canada	2025-02-21
Halifax		B3H	Canada	2025-02-21
Halifax		B3H	Canada	2025-02-21
Halifax		B3L	Canada	2025-02-21
Toronto		M4S	Canada	2025-02-21
Halifax		B3H3K1	Canada	2025-02-21
Halifax		B3L	Canada	2025-02-21
Halifax		B3K 2Z8	Canada	2025-02-21
Halifax		B3H 2K3	Canada	2025-02-21
Upper Tantallon, Nova Scotia		B3Z 1P7	Canada	2025-02-21
Richmond Hill		L4C	Canada	2025-02-21
Halifax		B3H 1L3	Canada	2025-02-22
Dartmouth		B3A	Canada	2025-02-22
Halifax	Nova Scot	B3L	Canada	2025-02-22
Middle Sackville		B4C	Canada	2025-02-22

	Halifax		B3M	Canada	2025-02-22
	Dartmouth		B2Y3J6	Canada	2025-02-22
	Halifax		B3L1J8	Canada	2025-02-22
	Musquodoboit Harbour		B0J2L0	Canada	2025-02-22
	Halifax		B3M	Canada	2025-02-22
	Bedford		B4A	Canada	2025-02-22
	Halifax		B3H4E5	Canada	2025-02-22
	Windsor		B0N 2T0	Canada	2025-02-22
	Halifax		B3K	Canada	2025-02-22
	Calgary		T3c2b6	Canada	2025-02-22
	Wolfville		B4P	Canada	2025-02-22
	Halifax		B3L	Canada	2025-02-22
	Halifax	Nova Scot	B3h 3x9	Canada	2025-02-22
	Haldimand		N3W2K2	Canada	2025-02-22
	Halifax		B3H4E5	Canada	2025-02-22
	Sackville	Nova Scot	B4C 3R8	Canada	2025-02-22
	Head of Jeddore		B0j 1p0	Canada	2025-02-22
	Canning		B0P1H0	Canada	2025-02-22
	Halifax		B3K2R6	Canada	2025-02-22
	Halifax		B3H	Canada	2025-02-22
	Halifax		B3H 2L7	Canada	2025-02-22
	Halifax		B3H	Canada	2025-02-22
	Halifax		B3H 4C5	Canada	2025-02-22
	Halifax		B3K	Canada	2025-02-22
	Halifax		B3L	Canada	2025-02-22
	Halifax		B3H 4C6	Canada	2025-02-22
	Halifax		B3H	Canada	2025-02-22
	Halifax		B3H 4C5	Canada	2025-02-22
	Halifax		B3K	Canada	2025-02-22
	Halifax		B3N	Canada	2025-02-22
				Canada	2025-02-22
	Halifax		B3J	Canada	2025-02-22

Halifax		B3H	Canada	2025-02-22
Halifax		B3N 3B9	Canada	2025-02-22
Halifax		B3R 2Z8	Canada	2025-02-22
Halifax		B3H2L4	Canada	2025-02-22
Halifax		B3H	Canada	2025-02-22
Dartmouth		B2V	Canada	2025-02-22
Dartmouth		B2W	Canada	2025-02-22
Halifax		B3N 1E4	Canada	2025-02-22
Bedford		B4A	Canada	2025-02-22
Antigonish		B2G	Canada	2025-02-23
Halifax		B3K	Canada	2025-02-23
Halifax		B3K	Canada	2025-02-23
Halifax		B3K	Canada	2025-02-23
Halifax		B3h4c6	Canada	2025-02-23
Halifax		B3K	Canada	2025-02-23
Edmonton		T6R	Canada	2025-02-23
Halifax		B3J	Canada	2025-02-23
Dartmouth		b2z 1b3	Canada	2025-02-23
Halifax		B3H 2H8	Canada	2025-02-23
Upper Tantallon		B3Z	Canada	2025-02-23
Halifax		B3M	Canada	2025-02-23
Halifax		B3L	Canada	2025-02-23
Halifax		B3H	Canada	2025-02-23
Halifax		B3K	Canada	2025-02-23
Nantes		44000	France	2025-02-23
Halifax		B3H4E5	Canada	2025-02-23
Halifax		B3H 3K8	Canada	2025-02-23
Halifax		B3L	Canada	2025-02-23
Halifax		B3K	Canada	2025-02-23
Halifax		B3L	Canada	2025-02-23
Halifax		B3H	Canada	2025-02-23
Calgary		T1Y 2E5	Canada	2025-02-23

Halifax		B3H	Canada	2025-02-23
Halifax		B3H 3K3	Canada	2025-02-23
Pink Mountain		V0c 2b0	Canada	2025-02-23
Halifax		B3N	Canada	2025-02-23
Dartmouth		B2Y	Canada	2025-02-23
Dartmouth		B3A1R1	Canada	2025-02-23
Mahone Bay		B0J	Canada	2025-02-23
Dartmouth		B2W	Canada	2025-02-23
Halifax		B3H 3N2	Canada	2025-02-23
Eastern Passage		B3G	Canada	2025-02-23
Halifax		B3H3K7	Canada	2025-02-23
Burnaby		V5B 4S4	Canada	2025-02-23
waterville		b0p1v0	Canada	2025-02-23
Halifax		B3H4C5	Canada	2025-02-23
Montreal		H1Z	Canada	2025-02-23
Head of Chezzetcook		B0j 1n0	Canada	2025-02-23
Halifax		B3L	Canada	2025-02-23
Laval		H7R	Canada	2025-02-23
Bridgewater		B4V3A6	Canada	2025-02-23
Upper Kingsburg		B0J 2X0	Canada	2025-02-23
Halifax		B3M	Canada	2025-02-23
Halifax		B3K	Canada	2025-02-23
Toronto		M4E	Canada	2025-02-23
Fort McMurray		T9H	Canada	2025-02-23
Halifax		B3H2A1	Canada	2025-02-23
Halifax		B3K	Canada	2025-02-23
Halifax		B3L 1X5	Canada	2025-02-23
Halifax		B4L	Canada	2025-02-23
Halifax		B3H	Canada	2025-02-23
Halifax		B3L1Z6	Canada	2025-02-23
Halifax		B3L1G8	Canada	2025-02-23
Halifax		B3l3j7	Canada	2025-02-23

	Halifax		B3H	Canada	2025-02-23
	Halifax		B3L	Canada	2025-02-23
	Halifax		B3M	Canada	2025-02-23
	Halifax		B3M	Canada	2025-02-23
	Halifax		B3H	Canada	2025-02-23
	halifax		b3h 1y3	Canada	2025-02-23
	Halifax		B3L3V1	Canada	2025-02-23
	Halifax		B3M	Canada	2025-02-23
	Halifax		B3K	Canada	2025-02-23
	Halifax		B3K	Canada	2025-02-23
	Halifax		B3K	Canada	2025-02-23
	Halifax		B3L	Canada	2025-02-23
	Halifax		B3M	Canada	2025-02-23
	Halifax		B3H	Canada	2025-02-23
	Alajuela			Costa Ric	2025-02-23
	Halifax		B3L	Canada	2025-02-23
	Halifax		B3K	Canada	2025-02-23
	Halifax		B3L 2X9	Canada	2025-02-23
	Halifax		B3K	Canada	2025-02-23
	Kingston		K7L 2E6	Canada	2025-02-23
	Halifax		B3N	Canada	2025-02-23
	Halifax		B3L	Canada	2025-02-23
	Halifax		B3L	Canada	2025-02-23
	Halifax		B3K	Canada	2025-02-23
	Halifax		B3M	Canada	2025-02-23
	Halifax		B3H	Canada	2025-02-23
	Halifax		B3K	Canada	2025-02-23
	Dartmouth		B2W	Canada	2025-02-23
	Halifax		B3H	Canada	2025-02-23
	Halifax		B3K	Canada	2025-02-23
	Halifax		B3M	Canada	2025-02-23
	Halifax		B3M	Canada	2025-02-23

Halifax		B3K	Canada	2025-02-23
Halifax		B3L	Canada	2025-02-23
Halifax		B3M	Canada	2025-02-23
Halifax		B3A 4H4	Canada	2025-02-23
Halifax		B3K	Canada	2025-02-23
Halifax		B3K	Canada	2025-02-23
Halifax		B3h	Canada	2025-02-23
Halifax		B3H	Canada	2025-02-23
			Canada	2025-02-23
Halifax		B3H	Canada	2025-02-23
Halifax		B3I 3E4	Canada	2025-02-23
Halifax		B3K	Canada	2025-02-23
Halifax		B3K	Canada	2025-02-23
Halifax		B3K	Canada	2025-02-23
Halifax		B3K	Canada	2025-02-23
Halifax		B3M	Canada	2025-02-23
Halifax		B3M	Canada	2025-02-23
Halifax		B3L 3H1	Canada	2025-02-23
Halifax		B3K	Canada	2025-02-23
Halifax		B3K	Canada	2025-02-23
Halifax		B3L	Canada	2025-02-23
Halifax		B3H2P3	Canada	2025-02-23
Halifax		B3K	Canada	2025-02-23
Halifax		B3L 3G3	Canada	2025-02-23
Halifax		B3K	Canada	2025-02-23
Halifax		B3N	Canada	2025-02-23
Halifax		B3L 1S8	Canada	2025-02-23
Montreal		H2W	Canada	2025-02-23
Sydney		B1R	Canada	2025-02-23
Halifax		B3K	Canada	2025-02-23
Halifax		B3I 2y4	Canada	2025-02-24
Halifax		B3H	Canada	2025-02-24

Halifax		B3H	Canada	2025-02-24
Halifax		B3K	Canada	2025-02-24
Halifax		B3K	Canada	2025-02-24
Halifax		B3L	Canada	2025-02-24
Halifax		B3L	Canada	2025-02-24
Halifax		B3H2X1	Canada	2025-02-24
Halifax		B3L 3N9	Canada	2025-02-24
Halifax		B3L	Canada	2025-02-24
			Canada	2025-02-24
Halifax		B3K	Canada	2025-02-24
Halifax		B3K	Canada	2025-02-24
Halifax		B3M	Canada	2025-02-24
Halifax		B3L 2E2	Canada	2025-02-24
Halifax		B3K	Canada	2025-02-24
Halifax		B3H	Canada	2025-02-24
Halifax		B3M	Canada	2025-02-24
Halifax		B3H 4B4	Canada	2025-02-24
Halifax		B3J	Canada	2025-02-24
Halifax		B3K	Canada	2025-02-24
Halifax		B3K	Canada	2025-02-24
Halifax		B3K	Canada	2025-02-24
Halifax		B3K	Canada	2025-02-24
Halifax		B3H1L6	Canada	2025-02-24
Halifax		B3H	Canada	2025-02-24
Halifax		B3M	Canada	2025-02-24
Vancouver		V5R	Canada	2025-02-24
Halifax		B3L 3T7	Canada	2025-02-24
Halifax		B3K	Canada	2025-02-24
Halifax		B3H	Canada	2025-02-24
Halifax		b3l 2x5	Vietnam	2025-02-24
Halifax		B3H2H2	Canada	2025-02-24
Halifax		B3H 1N4	Canada	2025-02-24

	Markham		L3P	Canada	2025-02-24
	Halifax		B3K	Canada	2025-02-24
	Halifax		B3K	Canada	2025-02-24
	Halifax	Nova Scot	B3L	Canada	2025-02-24
	Halifax		B3I3G9	Canada	2025-02-24
	Halifax		B3H 2X2	Canada	2025-02-24
	Halifax		B3H 2X1	Canada	2025-02-24
	Halifax		B3h	Canada	2025-02-24
	Halifax		B3K	Canada	2025-02-24
	Halifax		B3K	Canada	2025-02-24
	Bedford		B4B	Canada	2025-02-24
	Halifax		B3L 2X5	Canada	2025-02-24
	Bedford		B4B	Canada	2025-02-24
	Dartmouth		B3A	Canada	2025-02-24
	Halifax		B3L3T2	Canada	2025-02-24
	Halifax		B3K	Canada	2025-02-24
	Halifax		B3H	Canada	2025-02-24
	Halifax		B3H	Canada	2025-02-24
	montreal		h2y4a3	Canada	2025-02-24
	Halifax		B3H 3K9	Canada	2025-02-24
	Halifax		B3H1A5	Canada	2025-02-24
	Halifax		B3M	Canada	2025-02-24
	Halifax		B3J	Canada	2025-02-24
	Halifax		B3K	Canada	2025-02-24
	Halifax		B3K3M2	Canada	2025-02-24
	Halifax		B3H 4G6	Canada	2025-02-24
	Halifax		B3K	Canada	2025-02-24
	Halifax		B3H2B5	Canada	2025-02-24
	Halifax		B3H 3V5	Canada	2025-02-24
	Halifax		B3H	Canada	2025-02-24
	Halifax		B3H	Canada	2025-02-24
	Halifax		B3k 5h2	Canada	2025-02-24

Halifax		B3M	Canada	2025-02-24
Halifax		B3H 3Y8	Canada	2025-02-24
Halifax		B3K	Canada	2025-02-24
Halifax		B3M	Canada	2025-02-24
Halifax		B3L	Canada	2025-02-24
Halifax		B3K	Canada	2025-02-24
Halifax		B3H	Canada	2025-02-24
Halifax		B3K	Canada	2025-02-24
Halifax		B3K 1X3	Canada	2025-02-24
Halifax		B3H	Canada	2025-02-24
Halifax		H1Z	Canada	2025-02-24
Halifax		B3M	Canada	2025-02-24
Halifax		B3P	Canada	2025-02-24
Halifax		B3H	Canada	2025-02-24
Halifax		B3H 3P3	Canada	2025-02-24
Halifax		B3H 4G6	Canada	2025-02-24
Halifax		B3M	Canada	2025-02-24
Halifax		B3H	Canada	2025-02-24
Halifax		B3L	Canada	2025-02-24
Halifax		B3K	Canada	2025-02-24
halifax		B3h1L8	Canada	2025-02-24
Moncton		E1C	Canada	2025-02-24
Halifax		B3L1T8	Canada	2025-02-24
Halifax		B3K	Canada	2025-02-24
Halifax		B3K	Canada	2025-02-24
Halifax		B3J	Canada	2025-02-24
Halifax		B3L	Canada	2025-02-24
Halifax		B3H	Canada	2025-02-24
Halifax		B3K0J3	Canada	2025-02-24
Halifax		B3H 2M9	Canada	2025-02-24
Halifax, NS		B3M 4X5	Canada	2025-02-24
Halifax		B3H	Canada	2025-02-24

Halifax		B3H 4E2	Canada	2025-02-24
Halifax		B3H 2M8	Canada	2025-02-24
Halifax		B3K	Canada	2025-02-24
Hubbards		B0J	Canada	2025-02-24
Halifax		B3H1R9	Canada	2025-02-24
Halifax		B3L	Canada	2025-02-24
Halifax		B3M	Canada	2025-02-24
Halifax		B3M	Canada	2025-02-24
Halifax		B3K	Canada	2025-02-24
Halifax		B3L	Canada	2025-02-24
Halifax		B3H	Canada	2025-02-24
Halifax		B3M4V2	Canada	2025-02-24
Halifax		B3L 3J1	Canada	2025-02-24
Dartmouth		B2X 1B1	Canada	2025-02-24
Halifax		B3K	Canada	2025-02-24
Halifax		B3J	Canada	2025-02-24
Brookside		B3T	Canada	2025-02-24
Halifax		B2Y 2E3	Canada	2025-02-24
Halifax		B3H	Canada	2025-02-24
Halifax		B3L1S2	Canada	2025-02-24
Halifax		B3P	Canada	2025-02-24
Peterborough		K9H	Canada	2025-02-24

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Name	City	Province	Postal Code	Country	Date	Comment
	Truro		B2N	Canada	2025-02-18	"I wish to maintain the quality of life, heritage and green space in HRM"
	Halifax		B3H	Canada	2025-02-18	"I'm concerned about what's happening to our city. Crowded roads, tall Buildings creating wind tunnels, less Trees, and safety, affordable housing, and garbage concerns."
	Halifax		B3K	Canada	2025-02-19	"The development of the City needs safe and strategic planning"
	Halifax		B3H	Canada	2025-02-19	"I am concerned that the rapid development and growth of Halifax is going to ruin the reason why we chose to live in this area and this country"
	Halifax		B3H1N4	Canada	2025-02-19	"We need our city and politicians to be smart. That means listening to all of us, the people, the citizens, across all our diversity, and in the most local sense. The corrosion of quality and affordability, safety, of all of the neighborhoods."
	Irish Mountain		B3K 1L1	Canada	2025-02-19	"Plan for the Many, Not the Market."
	Halifax		B3H 3Y1	Canada	2025-02-20	"My neighbourhood is being destroyed by traffic congestion, apartment buildings being built with no parking spaces, and green spaces being replaced with construction and concrete. There needs to be a proper plan to keep the city livable."
	Halifax		B3H 3p2	Canada	2025-02-20	"The zoning changes have already caused havoc in the city. Streetscapes are being razed, trees lost, streets congested. What's worse -- the bylaws do nothing to guarantee more affordable housing. We need more public consultation."
	Halifax		B3J	Canada	2025-02-20	"I'm deeply concerned about the rapid push to radically alter zoning bylaws and the potential destruction of existing neighbourhoods."
	Halifax		B3N 3M4	Canada	2025-02-20	"I am concerned that the developers are driving change, and not the city. Many things that make Halifax special, like heritage buildings, are being lost."
	Halifax		B3H 1L3	Canada	2025-02-22	"Densification is needed in Halifax but it requires a well thought out process."
	Halifax		B3N 1E4	Canada	2025-02-22	"I don't like the way Halifax is changing, with old buildings being destroyed & new ugly, inappropriate high rises appearing, like the 32 floor, blue-lit monstrosity on the Arm near the Armdale roundabout that we get to look at every day."
	Halifax		B3K	Canada	2025-02-23	"I care about my community and want to ensure family and community are prioritized."
	Halifax		B3H 2H8	Canada	2025-02-23	"The whole reason people love Halifax and want to live in Halifax is for quality of life. We are losing Halifax's character and easy way of life. Stop Halifax from becoming another run of the mill city."
	Calgary		T1Y 2E5	Canada	2025-02-23	"We don't need wider roads. We need more trees to enhance neighborhoods."
	Eastern Passage		B3G	Canada	2025-02-23	"I believe the rate of construction of huge apartment buildings is ruining the city."
	Halifax		B3L	Canada	2025-02-23	[REDACTED]
	Halifax		B3L	Canada	2025-02-23	"I am concerned about these proposed changes!"
	Halifax		B3H	Canada	2025-02-23	"It doesn't solve the problem of affordable housing, it will add to the congestion problem and it doesn't make the developers accountable to anyone."
	Halifax		B3H	Canada	2025-02-23	"I oppose the new zoning bylaws."
	Halifax		B3N	Canada	2025-02-23	"I believe in livable cities without stuffing people in like sardines. Green space needs to be protected as do historical buildings. I have a landlord across the street that kicked out good long-term tenants involved in their community."
	Halifax		B3K	Canada	2025-02-24	"These changes do nothing to address housing affordability and ignore the consequences of worsening the strain on our already overloaded infrastructure."
	Halifax		B3L 2E2	Canada	2025-02-24	"Develop outside the city, not zoning changes in residential neighborhoods on the peninsula"
	Halifax		B3L 2X5	Canada	2025-02-24	"I feel this new plan will compromise the safety of our city, from response times for emergencies to evacuation should the need arise. I also don't feel that our current or future road infrastructure can support such an increase in population."
	Halifax		B3H 3K9	Canada	2025-02-24	"I think the changes proposed helps developers but does not provide the affordable housing that is needed."
	Halifax		B3M	Canada	2025-02-24	"Having such rapid growth without care for the structure of neighborhoods is unacceptable. The only benefit is to developers, and if that is City Council's and the Province's main concern, then where has 'representative government' gone?"
	Halifax		B3H 3V5	Canada	2025-02-24	"It will impact neighborhoods negatively."
	Halifax		B3H	Canada	2025-02-24	"I want to keep Halifax free of oversized buildings which will ruin our lovely streets"
	Halifax, NS		B3M 4X5	Canada	2025-02-24	"Given that this is a democratic Society, I'm in full support of this petition that zoning bylaws mandate a three-month period of active community engagement and involvement before the approval of any development project"

February 24, 2025

Mayor, Council and Staff
Halifax Regional Municipality
1841 Argyle Street
Halifax, NS B3J 3A5

Dear Mayor, Council and Staff:

Re: Response to Minimum Planning Requirements Regulations

We are writing in response to the above noted matter. We are concerned that the Province has summarily imposed these Regulations on HRM and its constituents without prior public consultation. This occurred while HRM is developing a new Regional Plan. In so doing, the Province upended essential elements of its own minimum planning principles of public participation and information gathering. The vast majority of HRM constituents are unaware of the sudden imposition of these Regulations and the impact it will have on their communities.

Further, the Province has ignored HRM's unique legal status as set out in the Preamble to the Halifax Regional Municipality Charter:

AND WHEREAS the Province of Nova Scotia recognizes that the Halifax Regional Municipality has legislative authority and responsibility with respect to matters dealt with in this Act;

AND WHEREAS the Halifax Regional Municipality is a responsible order of government accountable to the people...

HRM is recognized as a separate order of government unique amongst NS municipalities and has the legislative authority and responsibility for such matters as municipal planning. The Regulations are an overreach by the Province. Notwithstanding, the Regulations were made effective by the Province in August 2024 during the municipal election when it would be challenging for the former Council and staff to fully consider them or provide any opportunity for prior public notice or input. Even with the short extension the Province recently granted at HRM's request, there is not enough time to adequately determine if and how the Regulations can be actioned or afforded by HRM.

The Regulations require HRM to make a series of significant Municipal Planning Strategy amendments including declaring that "...the most urgent priority in municipal land-use planning, regulation and development approval is to rapidly increase the supply of housing in the municipality" [section 4A (2)(a)]. Sudden legislative change of lasting impact for HRM without adequate and meaningful public awareness and consultation is contrary to effective budgeting and planning for the increased demands on municipal infrastructure and services as

outlined in the Liveable Halifax Coalition Petition which we support and as further described below.

Council is encouraged to push back against this unfunded Provincial regulatory mandate. We are unaware of any new Provincial funding to support the rapid increase in housing supply demanded by the Regulations. HRM taxpayers will be left to solely support the expansion and repair of municipal infrastructure and services already under resourced to meet an additional housing surge. The Halifax Water Commission alone has experienced recent boil water advisories, water main breaks, water supply conservation measures, incomplete capital project schedules, water treatment plant replacement plan and an accumulated deficit of \$41 M because of capacity issues. Calgary and Atlanta are other recent examples of how rapid urban growth can cause a water supply and demand imbalance that worsens as cities grow without sufficient time in which to plan. An adequate supply of water for drinking and firefighting is not a given, nor an infinite resource.

The dictates of the Provincial Regulations fail to address other municipal funding shortfalls caused by rapidly increasing the supply of housing in HRM including: wastewater treatment; storm water management; firefighting, police and emergency management infrastructure and trained personnel; road and sidewalk expansion and maintenance; public transit; recreation facilities; solid waste management, etc. These additional capital and operating costs will fall to HRM taxpayers yet again.

Nor should it be necessary for Council to seek legal immunity from future claims of constructive taking/de facto expropriation of private property because of the Provincial Regulations. The October 1, 2024 motion of Council that the "...Mayor send a letter to the Province of Nova Scotia requesting amendments to the HRM Charter to include immunity from constructive taking/de facto expropriation claims" is troubling and should be repealed. If a letter has already been sent to the Province, then a motion passed that the initial request be withdrawn along with the Provincial Regulations. HRM must be given sufficient time to complete the drafting and public consultation process for the new Regional Plan before more legislative changes are considered. Council and staff and their constituents must first assess what HRM's future growth objectives and costs are, particularly given CMHC's February report projecting a 2.5% vacancy rate (up from 1% in 2023) as immigration levels decrease, and new housing stock nearing completion is added. Additional time will also enable the Province to expand its affordable housing offerings and local universities and colleges to undertake much needed student housing initiatives.

Thank you for your consideration of this submission. We look forward to being notified of opportunities for an expanded discussion about housing.

 Beaufort Avenue, HRM

February 24, 2025

Office of the Mayor, Halifax Regional Municipality
HRM Council
5201 Duke St, Halifax,
Nova Scotia
B3J 1N9
c/o clerks@halifax.ca

Dear Mayor Filmore, and City Council,

Andy, if I may. We met some years ago when you were campaigning for Member of Parliament for Halifax. I've followed you and your clear commitment to the Halifax / K'jipuktuk community, so decided it would be best to write to you directly about a concern that is accelerating widely across the HRM.

I live on the peninsula, and in a few short weeks, have been inundated with expressions of alarm about the troubling direction the City is moving in regard densification and development. This led me and others to establish what now is an extremely fast-growing citizen group, the *Liveable Halifax Coalition*. This alliance of communities and citizens actively support *smart development and densification in HRM*, while assuring the building and securing of truly affordable housing, for all who live in Halifax.

So why the alarm?

We have been closely documenting what by all assessments, we deem to be an unruly approach to densification. We are witnessing layer upon layer of unintended consequences in the race to build – even while we understand there is a need to build – not building without care and responsiveness to what makes this city wonderful, qualities which we all need to protect both for community, and even for 'marketability' reasons. Basic checks and balances, to ensure the quality of our urban environment, have been eliminated from planning reviews. Blanket lifting of regulations to accelerate building, without real understanding of short, mid and long term effects on community liveability, infrastructure, safety and so much more – points to an administration that is, perhaps inadvertently, moving far too fast.

Even before the HAF was adopted last year, we were witnessing the breakneck speed of development and how it has already had a negative impact on:

- city services
- traffic
- parking
- heritage preservation
- and green space

What's worse is that new zoning bylaws do little to ensure increased levels of affordable housing. City streetscapes are being razed to build apartment towers with rents well over \$2000/month. Relying on a 'trickle-down effect' is not a well-grounded planning strategy to ensure that people have the homes they need at a price they can afford.

The changes these bylaws allow will be irreversible. Before our city is damaged beyond repair, we ask that you put in place specific risk-management strategies to

- mitigate potential harms arising from developments;
- mandate real consultation with existing communities before developments are approved;
- address infrastructure pressures – both immediate and longer term;
- ensure public safety with updated evacuation routes; and
- align projects with current strategies such as the Integrated Mobility Plan and the Environmental Protection Plan.

There's rising dissatisfaction throughout the city because people's voices aren't being heard. Their communities are being radically altered without their input.

That's why we're asking that the City to mandate a three-month period of active community engagement and involvement before the approval of any development project. We believe there is a way to mitigate both the negative effects on our city, and assure that citizen legal rights are respected, not impeded. But that has to happen by engagement with community, not by inhibiting citizens from exercising their rights. If we want development and densification to work and succeed for all, we must do it together.

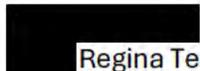
This is all about keeping Halifax liveable, and bringing better sense and community-responsiveness to densification development, so we can support development, in way to prevent it from ruining the quality of community, space, environment, safety etc that makes this city amazing, *while resolutely assuring it is affordable literally for everyone.*

One thing we all agree on – and which we have been compiling ample information on – is that the new processes of 'anything goes' deregulation being installed are severely threatening to undermine what we love here, why we live here, why others see it as a place they wish to live as well.

The process should do the opposite, improve the quality of what we have, and make it sharable, lasting, and a boon to our economy at the same time.

Sincerely,



 Regina Terrace
Halifax, Nova Scotia
B3H 1N4

cc. Laura White, Councilor

██████ Tower Road
Halifax, NS B3H 2X8

February 24, 2025

Mayor Andy Fillmore
Halifax Regional Municipality

Dear Mayor Fillmore,

We are writing to formally express our concerns regarding the recent trend of multi-unit residential developments being approved in areas that have traditionally been designated for single-family homes.

As a resident of Tower Road in Halifax, I strongly believe that these projects are not in line with the character and intent of our community, and I urge the City Council/Planning Department to reconsider allowing such developments in strictly residential areas.

The introduction of high-density housing in established neighborhoods raises several concerns, including:

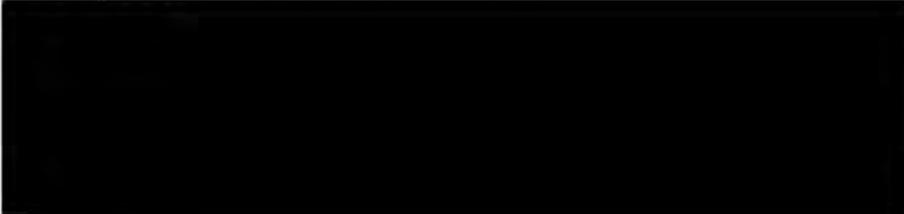
1. **Increased Traffic and Parking Issues** – Single-family neighborhoods are not designed to accommodate the additional traffic and parking demands that multi-unit buildings bring. This leads to congestion, safety hazards, and difficulty for current residents to park near their homes.
2. **Strain on Infrastructure and Public Services** – Water, sewage, roads, and emergency services are designed based on the expected density of single-family homes. A sudden increase in population due to multi-unit buildings could overwhelm these services, leading to decreased quality and higher costs for taxpayers.
3. **Disruption of Neighborhood Character** – Many residents chose to live in these areas because of the quiet, spacious, and family-friendly environment. Large, high-density buildings can disrupt the aesthetic and ambiance of the community, negatively affecting property values and overall livability.
4. **Environmental Impact** – The removal of green spaces and trees to accommodate large buildings contributes to increased heat, reduced air quality, and loss of natural habitats for local wildlife.

While I understand the need for diverse housing options, I believe that such developments should be strategically placed in areas that can support them without negatively impacting established neighborhoods and there are many such neighbourhoods available on the peninsula .

I urge the City Council to enforce zoning regulations that protect residential communities from incompatible high-density construction.

I appreciate your time and consideration of this matter, and I look forward to your response. Please let me know if there are any public meetings or opportunities for residents to voice their concerns.

Sincerely,



February 21st, 2025

Anne Winters, MCIP, LPP
Principal Planner
Regional Planning Team
Planning and Development
regionalplan@halifax.ca

RE: Minimum Planning Changes in Halifax Engagement Feedback

Dear Anne:

Clayton Developments Limited is pleased to submit comments on the proposed Minimum Planning changes in Halifax. We have structured our comments in a table to facilitate review, with the requirement and HRM’s proposed approach, along with our comments and questions. It would be helpful to have a discussion to follow up when you have had the opportunity to review our thoughts.

Minimum Planning Requirements and HRM Approach	Clayton Developments Comments
<p>(a) include a statement of policy that expressly recognizes that the Province and, in particular, the Municipality are experiencing a housing shortage crisis and specifies that the most urgent priority in municipal land-use planning, regulation and development approval is to rapidly increase the supply of housing in the Municipality.</p> <p>Approach: Include policy intent in the Regional Plan to increase housing supply.</p>	<ul style="list-style-type: none"> • In new Regional MPS policy which recognizes the housing shortage crisis and establishes a goal of increasing housing supply, there should be specifics around the provision of ground-based housing supply. The municipality has made substantial policy changes to encourage multi-unit development in the last two years. We recommend that HRM consider targets for ground-based housing, which would facilitate ownership options for housing to supplement to our rental-focused multiunit housing market. • Policies to encourage additional supply should be region-wide not just regional centre based. • Specific targets should be established for housing land supply. Adequate land supply discussions should be considered in a regular target review. Developers need notice to deploy resources and capital, and we need to move towards planning for our future needs rather than being reactionary. As a result, the availability of land needs to be more than just in time availability. The municipality needs a comprehensive plan to bring serviced land for ground-based housing available which is

	<p>responsive to demand but is less tightly controlled than in the past.</p> <ul style="list-style-type: none"> The policy should acknowledge that a tightly regulated approved housing land supply and complex planning rules increase housing costs and suggest measures to remedy this.
<p>(b) require that priority be given to increasing the supply of safe, sustainable and affordable housing in the Municipality over other interests identified in the municipal planning strategy for the purposes of all processes, approvals and decisions made under the municipal planning strategy.</p> <p>Approach: Include policy intent in the Regional Plan to increase safe, sustainable and affordable housing.</p>	<ul style="list-style-type: none"> The municipality needs to clarify how it interprets ‘safe, sustainable and affordable housing’. The policy seems to only address a limited portion of housing needs and does not appear to be broad enough to address the actual issue. <p>In the context of this requirement, the term affordable may be used in a very broad or narrow sense. It should address all market segments and all housing types. The Municipality should be explicit on this.</p> <ul style="list-style-type: none"> It appears that the Municipality may be taking a very narrow view of what is sustainable. The Municipality should be taking a balanced approach to ensure all housing needs are addressed. Concentration on a single housing type will ultimately create unintended issues.
<p>(c) permit residential uses in all zones, except for all of the following:</p> <p>(i) areas zoned for industrial, military, park, transportation reserve and utility uses,</p> <p>(ii) zones intended to protect the environment, water supply, floodplains or another similar interest;</p> <p>Approach: Include policy intent in the Regional Plan, but no changes to land use by-laws proposed at this time. Future changes may happen through other planning projects such as the upcoming Suburban Plan.</p>	<ul style="list-style-type: none"> While zones which permit development agreements (such as CDD zones) enable the consideration of residential uses, they do not permit them as of right. Creating some as-of-right, residentially zoned should be considered in a goal to reduce process to enable housing development.
<p>(d) require that the Municipality share with the Province the information used by the Municipality</p>	<ul style="list-style-type: none"> The intent to share information in a municipal plan policy is different than a workplan or

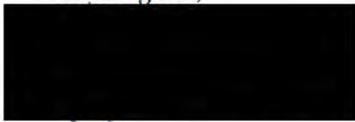
<p>to identify, fund, schedule and deploy the infrastructure to develop an adequate supply of housing to support anticipated population growth;</p> <p>Approach: Include policy intent in the Regional Plan to share information with the Province.</p>	<p>requirement to share information. Stronger wording should be used to require the sharing of information.</p>
<p>(e) provide for the adoption of a secondary municipal planning strategy and the implementation of a land-use by-law for the area of the Municipality identified as the suburban area on the map attached as Appendix A, or a substantially similar area, no later than January 31, 2025;</p> <p>Approach: A revised work plan for the Suburban Plan is expected to come forward in Spring 2025.</p>	<ul style="list-style-type: none"> The proposal does not appear to address the timeline of the proposed Suburban Plan, just a limited version of the Suburban Accelerator Plan which only covers limited properties.
<p>(f) for developments enabled under the Municipality’s Conservation Design Development policies in the Regional Municipal Planning Strategy that begin construction before April 1, 2027, determine the maximum density of a development based on a lot’s gross area and not on its net area;</p> <p>Approach: Adjust Regional Plan policy to provide alternative density calculations for Conservation Design Development projects until April 1, 2027.</p>	<ul style="list-style-type: none"> No comment
<p>(g) not impose maximum height restrictions in a manner that negatively affects the density of residential buildings using mass timber or any other construction method;</p> <p>Approach: Include policy intent in the Regional Plan and adjust land use by-laws to convert height from metres and feet to storeys for medium and high-density residential buildings.</p>	<ul style="list-style-type: none"> Having specific details on height conversions would be helpful. We will need to check for issues that may arise with these changes when those are released. In our experience, issues arise when the detailed wording is enacted without the opportunity to comment on the proposed regulatory language. How will this be addressed in DA’s where references are made in metres or feet or in DA schedules which override the LUB which are in the previous metre format? Recommended Approach: Many of our development agreements link to Land Use By-law requirements. If those Land Use By-laws

	<p>are heavily updated for building heights, ideally the LUB should allow us to achieve the benefits of the changes without amending our agreements. Verbiage should consider conversions of maximum building height to any new format. Changes should be vetted so they do not negatively affect development agreements nor require amendments to agreements.</p>
<p>(h) for residential buildings that begin construction before April 1, 2027, provide that no requirement related to unit mix applies;</p> <p>Approach: Adjust land use by-laws to remove the bedroom count requirements until April 1, 2027.</p>	<ul style="list-style-type: none"> • How this proposed to be accommodated where there is a mix specified in a development agreement? • How is 'begin construction' being interpreted by HRM? Issuance of a construction permit? Recommended Approach: When you are referring to an April 1st date, we recommend that issuance of a construction permit be the cutoff, with an additional timeline to complete construction.
<p>(i) provide that no requirement for on-site parking applies to residential uses within the urban service area;</p> <p>Approach: Adjust land use by-laws to remove on-site parking for residential uses within the Urban Service Area.</p>	<ul style="list-style-type: none"> • How is this proposed to be accommodated where there is a parking requirement in a development agreement? Is the intent to remove parking requirements in the Planned Growth Schedule in the Dartmouth By-law for Port Wallace and the Bedford By-law for Bedford West?
<p>(j) for multi-unit residential buildings that begin construction before April 1, 2027, not require that the ground floor consist of more than 20% commercial space;</p> <p>Approach: Adjust planning documents to reduce the amount of commercial space on the ground floor of a building until April 1, 2027.</p>	<ul style="list-style-type: none"> • We recommend that this requirement would benefit from an exclusion when the required commercial ground floor is under a certain size. There is little point in requiring a commercial ground floor area that is so small it is not viable for tenancy. • How is this proposed to be accommodated where there is a ground floor commercial requirement in a development agreement? • How is 'begin construction' being interpreted by HRM? Recommended Approach: When you are referring to an April 1st date, we recommend

	<p>that issuance of a construction permit be the cutoff, with an additional timeline to complete construction.</p>
<p>(k) permit temporary housing in non-permanent structures as a use in all zones where it can be safely established to allow employees to live on or near their worksite during a work assignment for a period of time that can be reasonably tied to the duration of the project and that is explicitly set out in the development permit;</p> <p>Approach: Adjust land use bylaws to allow temporary housing on or near construction worksites.</p>	<ul style="list-style-type: none"> How is this proposed to be accommodated where there is an existing development agreement? More detail is required to provide an effective comment.
<p>(l) permit manufactured housing, including modified shipping containers converted into housing, in all residential zones.</p> <p>Approach: Adjust land use by-laws to allow converted shipping containers as a dwelling or backyard suite.</p>	<ul style="list-style-type: none"> How is this proposed to be accommodated where there is an existing development agreement? More detail is required to provide an effective comment. <p>Recommended Approach: We would like to see the Planned Growth Schedule in the Dartmouth By-law for Port Wallace and the Bedford By-law for Bedford West be updated to permit 16’ wide manufactured townhouses similar to what we have built in Mount Hope.</p> <ul style="list-style-type: none"> We request that 16-foot-wide townhouse units should be permitted in all townhouse zones along with a permitted driveway.

Thank you for your consideration to our comments on your proposed changes to address the province’s updates to the minimum planning requirements. We feel a discussion and further information on detailed planning changes proposed would be beneficial. Once you have had the opportunity to review our thoughts and questions, we are available for further discussion.

Kind regards,



Jared Dalziel, MCIP, LPP
Senior Planner, Clayton Developments Limited

Appendix C - Information Factsheets



Minimum Planning Requirement (a)

The Government of Nova Scotia has required that Halifax Regional Municipality include mandatory content in the Regional Municipal Planning Strategy (Regional Plan) to address the issue of housing supply. This will require the municipality to make changes to the Regional Plan, community plans and land use by-laws.

For a full list of changes [click here](#).

Requirement:

a) include a statement of policy that expressly recognizes that the Province and, in particular, the Municipality are experiencing a housing shortage crisis and specifies that the most urgent priority in municipal land-use planning, regulation and development approval is to rapidly increase the supply of housing in the Municipality

How will the municipality meet this requirement?

- The Regional Municipal Planning Strategy (also called the 'Regional Plan') will include new policy that recognizes the housing shortage crisis and establishes a goal of increasing the housing supply
- The Regional Plan sets out a common vision and long-range, region-wide planning policies that outline where, when, and how growth and development should take place



Plans Affected:
Regional Municipal Planning Strategy (Regional Plan)

What will this change mean for me?

- This policy will acknowledge that increasing housing supply is an important priority for the municipality and will be a focus of future land use planning and development
- While no immediate changes to zoning or land use regulations are proposed with this new policy, increasing the supply of new housing across the region will be an important consideration in future land use planning efforts

Have questions?

Visit: shapeyourcityhalifax.ca/minimum-planning

Email: regionalplan@halifax.ca

Call: 902-943-5139

Please share your comments by February 24, 2025.



Minimum Planning Requirement (b)

The Government of Nova Scotia has required that Halifax Regional Municipality include mandatory content in the Regional Municipal Planning Strategy (Regional Plan) to address the issue of housing supply. This will require the municipality to make changes to the Regional Plan, community plans and land use by-laws.

For a full list of changes [click here](#).

Requirement:

b) require that priority be given to increasing the supply of safe, sustainable and affordable housing in the Municipality over other interests identified in the municipal planning strategy for the purposes of all processes, approvals and decisions made under the municipal planning strategy

How will the municipality meet this requirement?

- New language in the Regional Plan will emphasize the importance of increasing the supply of safe, sustainable, and affordable housing.
- The Regional Plan uses the lens of safety, sustainability, and affordability to create a framework for housing and growth that considers public health, use of existing infrastructure (e.g. water/sewer, roads, transit services, etc.) and complete communities where people can live, work, and play.



Plans Affected:

Regional Municipal Planning Strategy (Regional Plan)

What will this change mean for me?

- The Regional Plan will help guide future land use planning decisions and support an increase in housing supply and housing options that are safe, sustainable, and affordable.
- While no immediate changes to zoning or land use regulations are proposed with this new policy, increasing the supply of new housing across the region will be an important consideration in future land use planning efforts.

Have questions?

Visit: shapeyourcityhalifax.ca/minimum-planning

Email: regionalplan@halifax.ca

Call: 902-943-5139

Please share your comments by February 24, 2025.



Minimum Planning Requirement (c)

The Government of Nova Scotia has required that Halifax Regional Municipality include mandatory content in the Regional Municipal Planning Strategy (Regional Plan) to address the issue of housing supply. This will require the municipality to make changes to the Regional Plan, community plans and land use by-laws.

For a full list of changes [click here](#).

Requirement:

- c) permit residential uses in all zones, except for all of the following:
- (i) areas zoned for industrial, military, park, transportation reserve, and utility uses,
 - (ii) zones intended to protect the environment, water supply, floodplains or another similar interest;

How will the municipality meet this requirement?

- The Regional Plan will include policy intent to enable residential in all zones except for those identified in the regulations.
- To determine if changes are needed to meet the requirements, staff reviewed all zones within the municipality. After removing zones that are exempted within the regulation (see i and ii of the regulation above). Results showed that 99.8% of remaining properties already allow for a form of residential use.
- The remaining 0.2% of the residential properties are large-scale sites (such as Shopping Malls/Plazas) that may be appropriate for new housing through current or future development projects, pending future technical review and community engagement. Regional Plan policy will direct this work through the Suburban Plan process.



Plans Affected:

Regional Municipal Planning Strategy (Regional Plan)

What will this change mean for me?

- There are not any changes proposed to existing zones at this time. Future changes may be proposed through other planning projects such as the upcoming Suburban Plan, or site-specific planning applications. Information on how to participate in these process is posted on our [Active Planning Applications website](#).

Have questions?

Visit: shapeyourcityhalifax.ca/minimum-planning

Email: regionalplan@halifax.ca

Call: 902-943-5139

Please share your comments by February 24, 2025.



Minimum Planning Requirement (d)

The Government of Nova Scotia has required that Halifax Regional Municipality include mandatory content in the Regional Municipal Planning Strategy (Regional Plan) to address the issue of housing supply. This will require the municipality to make changes to the Regional Plan, community plans and land use by-laws.

For a full list of changes [click here](#).

Requirement:

d) require that the Municipality share with the Province the information used by the Municipality to identify, fund, schedule and deploy the infrastructure to develop an adequate supply of housing to support anticipated population growth

How will the municipality meet this requirement?

- The Regional Plan will clearly state the municipality's intent to share information about population, housing, employment conditions, and growth scenarios with the Province of Nova Scotia.

Plans Affected:

Regional Municipal Planning Strategy (Regional Plan)



What will this change mean for me?

- This change establishes the municipality's intent to share information with the Province to support housing supply.
- No immediate changes to zoning or land use development will occur because of these changes.

Have questions?

Visit: shapeyourcityhalifax.ca/minimum-planning

Email: regionalplan@halifax.ca

Call: 902-943-5139

Please share your comments by February 24, 2025.



Minimum Planning Requirement (e)

The Government of Nova Scotia has required that Halifax Regional Municipality include mandatory content in the Regional Municipal Planning Strategy (Regional Plan) to address the issue of housing supply. This will require the municipality to make changes to the Regional Plan, community plans and land use by-laws.

For a full list of changes [click here](#).

Requirement:

e) implementation of a land-use by-law for the area of the Municipality identified as the suburban area on the map attached as Appendix A, or a substantially similar area, no later than January 31, 2025

How will the municipality meet this requirement?

- The Regional Plan will include an overview of the Community Planning framework and establish intent to adopt a Suburban Plan.
- The development of the Plan requires comprehensive analysis, and community engagement.
- The Suburban Housing Accelerator Plan and Land Use By-law was adopted in 2024 and is expected to be expanded in the Spring of 2025.
- The Municipality continues to coordinate with the Province and other stakeholders on the development of the Suburban Plan.



Plans Affected:
Regional Municipal Planning Strategy (Regional Plan)

What will this change mean for me?

- The municipality will be undertaking a comprehensive planning process for the Suburban area (areas outside of the Regional Centre, where municipal water, wastewater, and transit services are available). Stay tuned for future planning engagement opportunities.

Have questions about the Minimum Planning Requirements?

Visit: shapeyourcityhalifax.ca/minimum-planning

Email: regionalplan@halifax.ca

Call: 902-943-5139

Please share your comments by February 24, 2025.

Have questions about the Suburban Planning process?

Email: suburbanplan@halifax.ca



Minimum Planning Requirement (f)

The Government of Nova Scotia has required that Halifax Regional Municipality include mandatory content in the Regional Municipal Planning Strategy (Regional Plan) to address the issue of housing supply. This will require the municipality to make changes to the Regional Plan, community plans and land use by-laws.

For a full list of changes [click here](#).

Requirement:

f) for developments enabled under the Municipality's Conservation Design Development policies in the Regional Municipal Planning Strategy that begin construction before April 1, 2027, determine the maximum density of a development based on a lot's gross area and not on its net area

How will the municipality meet this requirement?

- Conservation Design Developments (CDD) are a type of residential subdivision within the rural areas of HRM. CDDs are designed to conserve open space and protect environmental features and can allow for more density than what is typically permitted in unserviced/rural communities. CDDs require development agreements to proceed, which must be reviewed and approved by Community Council.
- Until April 1, 2027, a change in how density is calculated for these types of developments will be in place. There is potential for higher density to be allowed within a new CDD project. The requirements of CDDs will remain unchanged and public consultation and technical studies will still be required to ensure the environment and transportation systems are not negatively impacted.



Plans Affected: Regional Municipal Planning Strategy (Regional Plan)

What will this change mean for me?

- If you are involved in applying for or building Conservation Design Development projects, this change may apply to your project. Please contact staff for more information.
- For residents, this change may result in more residential units in CDD projects. Since these projects will still proceed through a Development Agreement process and require Community Council approval, there will be public notification if changes to a CDD are being made in your neighbourhood.

Have questions?

Visit: shapeyourcityhalifax.ca/minimum-planning

Email: regionalplan@halifax.ca

Call: 902-943-5139

Please share your comments by February 24, 2025.



Minimum Planning Requirement (g)

The Government of Nova Scotia has required that Halifax Regional Municipality include mandatory content in the Regional Municipal Planning Strategy (Regional Plan) to address the issue of housing supply. This will require the municipality to make changes to the Regional Plan, community plans and land use by-laws.

For a full list of changes [click here](#).

Requirement:

g) not impose maximum height restrictions in a manner that negatively affects the density of residential buildings using mass timber or any other construction method

How will the municipality meet this requirement?

- Apartment buildings will now have their maximum heights measured in total storeys instead of in feet or metres. This will allow for more flexibility in construction methods such as the timber-framed buildings.
- The definition of height in the land use by-law will reflect the height conversion to storeys.



Plans Affected:

Land use by-laws for

- Bedford
- Cole Harbour/Westphal
- Dartmouth
- Eastern Passage/Cow Bay
- Halifax Mainland
- Planning Districts 14/17 (Shubenacadie Lakes)
- Sackville Drive

What will this change mean for me?

- Going forward, medium and high density residential developments will be measured and regulated in storeys instead of feet and metres.

Have questions?

Visit: shapeyourcityhalifax.ca/minimum-planning

Email: regionalplan@halifax.ca

Call: 902-943-5139

Please share your comments by February 24, 2025.



Minimum Planning Requirement (h)

The Government of Nova Scotia has required that Halifax Regional Municipality include mandatory content in the Regional Municipal Planning Strategy (Regional Plan) to address the issue of housing supply. This will require the municipality to make changes to the Regional Plan, community plans and land use by-laws.

For a full list of changes [click here](#).

Requirement:

h) for residential buildings that begin construction before April 1, 2027, provide that no requirement related to unit mix applies

How will the municipality meet this requirement?

- Until April 1, 2027, the land use by-law regulations for apartments are being changed to remove all bedroom count requirements (the amount of studio, 1-bedroom, 2-bedroom units, etc. required per apartment building).

Plans Affected:

Land use by-laws for

- Bedford
- Dartmouth
- Downtown Halifax
- Halifax Mainland
- Regional Centre
- Suburban Housing Accelerator



What will this change mean for me?

- For buildings that begin construction before April 1, 2027, there will not be a requirement for a specific number of units having 1, 2, 3+ bedrooms in apartment buildings.
- Unit mix requirements will continue to apply after the specified date.

Have questions?

Visit: shapeyourcityhalifax.ca/minimum-planning

Email: regionalplan@halifax.ca

Call: 902-943-5139

Please share your comments by February 24, 2025.



Minimum Planning Requirement (i)

The Government of Nova Scotia has required that Halifax Regional Municipality include mandatory content in the Regional Municipal Planning Strategy (Regional Plan) to address the issue of housing supply. This will require the municipality to make changes to the Regional Plan, community plans and land use by-laws.

For a full list of changes [click here](#).

Requirement:

i) provide that no requirement for on-site parking applies to residential uses within the urban service area

How will the municipality meet this requirement?

- Land use by-law requirements will be changed so that residential buildings that are within the Urban Service Area are not required to provide a specific number of parking spots.
- Parking spot provision requirements for all other uses (e.g. commercial, retail, office, etc.) will remain unchanged. If developments include parking, requirements for parking lot design and landscaping, loading spaces, etc. will continue to apply.
- The Urban Service Area is the part of the municipality serviced with municipal water and sewer.

**Plans Affected:**

Regional Municipal Planning Strategy (Regional Plan)

Land use by-laws for:

- | | |
|--|---------------------|
| -Beaver Bank-Hammonds Plains-Upper Sackville | -Bedford |
| -Cole Harbour-Westphal | -Dartmouth |
| -Eastern Passage-Cow Bay | -Halifax Mainland |
| -Musquodoboit Valley-Dutch Settlement | -Chebucto Peninsula |
| -Sackville Drive | -Sackville |
| -Timberlea-Lakeside-Beechville | |
| -Planning Districts 14 and 17 (Shubenacadie Lakes)* | |
| -North Preston / Lake Major / Lake Loon / Cherry Brook / East Preston* | |

**An earlier version of this factsheet incorrectly omitted these land use by-laws. The factsheet has been updated to reflect the correct list of affected land use by-laws (Feb 14/25)*

What will this change mean for me?

- Developers and owners of residential buildings in the Urban Service Area will no longer be required to provide a specific number of parking spots. They may still voluntarily choose to provide parking spots.
- This change affects the requirements for all residential buildings on municipal water and sewer across the municipality. To learn what land use by-law applies to your home, please [click here](#).

Have questions?

Visit: shapeyourcityhalifax.ca/minimum-planning

Email: regionalplan@halifax.ca

Call: 902-943-5139

Please share your comments by February 24, 2025.



Minimum Planning Requirement (j)

The Government of Nova Scotia has required that Halifax Regional Municipality include mandatory content in the Regional Municipal Planning Strategy (Regional Plan) to address the issue of housing supply. This will require the municipality to make changes to the Regional Plan, community plans and land use by-laws.

For a full list of changes [click here](#).

Requirement:

j) for multi-unit residential buildings that begin construction before April 1, 2027, not require that the ground floor consist of more than 20% commercial space

How will the municipality meet this requirement?

- Until April 1, 2027, land use by-laws that currently require up to 100% of the ground floor of a building to be commercial uses will now only be required to provide 20% of the ground floor to be commercial.
- These changes are being applied to Pedestrian Oriented Commercial Streets in the Regional Centre and the Pedestrian Retail zone in Sackville Drive.
- The alternative to providing commercial uses for buildings on these commercial streets is to provide residential units at the ground level.



Plans Affected:

Regional Municipal Planning Strategy (Regional Plan)

Regional Centre Municipal Planning Strategy

Land use by-laws for

-Regional Centre

-Sackville Drive

-Bedford

What will this change mean for me?

- Some streets that currently require commercial uses along the ground floor in the Regional Centre and Sackville Drive may now have fewer commercial storefronts. Building owners may choose to provide more commercial uses than the 20% minimum.

Have questions?

Visit: shapeyourcityhalifax.ca/minimum-planning

Email: regionalplan@halifax.ca

Call: 902-943-5139

Please share your comments by February 24, 2025.



Minimum Planning Requirement (k)

The Government of Nova Scotia has required that Halifax Regional Municipality include mandatory content in the Regional Municipal Planning Strategy (Regional Plan) to address the issue of housing supply. This will require the municipality to make changes to the Regional Plan, community plans and land use by-laws.

For a full list of changes [click here](#).

Requirement:

k) permit temporary housing in non-permanent structures as a use in all zones where it can be safely established to allow employees to live on or near their worksite during a work assignment for a period of time that can be reasonably tied to the duration of the project and that is explicitly set out in the development permit

How will the municipality meet this requirement?

- There are existing regulations for temporary construction uses in all Land Use By-laws. Adjustments to the current language will ensure the intent of the Provincial Requirement is met across the entire municipality.
- The Regional Centre, Suburban Housing Accelerator, and Downtown Halifax land use by-laws allow temporary housing uses on or near the work site, so no changes are needed in those areas.



Plans Affected:

All land use by-laws except Regional Centre, Suburban Housing Accelerator, and Downtown Halifax

What will this change mean for me?

- Temporary housing for construction sites can now be located on nearby sites, in addition to the construction site itself.

Have questions?

Visit: shapeyourcityhalifax.ca/minimum-planning

Email: regionalplan@halifax.ca

Call: 902-943-5139

Please share your comments by February 24, 2025.



Minimum Planning Requirement (I)

The Government of Nova Scotia has required that Halifax Regional Municipality include mandatory content in the Regional Municipal Planning Strategy (Regional Plan) to address the issue of housing supply. This will require the municipality to make changes to the Regional Plan, Community Plans and Land Use By-Laws.

For a full list of changes [click here](#).

Requirement:

I) permit manufactured housing, including modified shipping containers converted into housing, in all residential zones

How will the municipality meet this requirement?

- Definitions and regulations in the land use by-laws are being adjusted to allow converted shipping containers as a residential use.

Plans Affected:

All land use by-laws



What will this change mean for me?

- You will be able to use a converted shipping container for a main residential dwelling or a backyard suite. Some by-law areas already permit this.
- Shipping containers will have to meet Building Code requirements to safely convert the shipping container into a dwelling use.

Have questions?

Visit: shapeyourcityhalifax.ca/minimum-planning

Email: regionalplan@halifax.ca

Call: 902-943-5139

Please share your comments by February 24, 2025.

Appendix D - Legislation

This consolidation is unofficial and is for reference only. For the official version of the regulations, consult the original documents on file with the [Office of the Registrar of Regulations](#), or refer to the [Royal Gazette Part II](#).

Regulations are amended frequently. Please check the list of [Regulations by Act](#) to see if there are any recent amendments to these regulations filed with our office that are not yet included in this consolidation.

Although every effort has been made to ensure the accuracy of this electronic version, the Office of the Registrar of Regulations assumes no responsibility for any discrepancies that may have resulted from reformatting.

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**Minimum Planning Requirements Regulations
made under subsection 229(4) of the
Halifax Regional Municipality Charter
S.N.S. 2008, c. 39
N.S. Reg. 138/2019 (effective December 3, 2019)
amended to N.S. Reg. 50/2025 (effective March 7, 2025)**

Table of Contents

Please note: this table of contents is provided for convenience of reference and does not form part of the regulations.

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Citation

1 These regulations may be cited as the *Minimum Planning Requirements Regulations*.

Definitions

2 In these regulations,

“Charter” means the *Halifax Regional Municipality Charter*;

“residential dwelling” means a permanent structure used for human habitation and includes a house, condominium, apartment building, cottage, mobile home or trailer.

Review of planning documents

- 3 (1) Council must include policies in a municipal planning strategy on how it intends to review the municipal planning strategy and land-use by-law that implements the municipal planning strategy.
- (2) A municipal planning strategy and its implementing land use by-law must be reviewed no later than 10 years after the later of the following dates:
- (a) the date it was adopted;
 - (b) the date it was last reviewed;
 - (c) the effective date of these regulations.
- (3) Where the Municipality has one or more secondary planning strategies, subsection (2) shall be satisfied if a municipal-wide municipal planning strategy and all the land use by-laws applicable in the Municipality are reviewed within the timelines provided in subsection (2).
- (4) “Review” in relation to a municipal planning strategy, means the Municipality’s consideration of the content of a municipal planning strategy to determine if it should be amended or replaced to ensure that it meets the purposes outlined in Section 228 of the Charter and the minimum planning requirements.

Mandatory content

- 4 In addition to the requirements prescribed in subsection 229(1) of the Act, a municipal planning strategy must contain all of the following:
- (a) a discussion of the background and contextual information that informed the goals and objectives of the municipal planning strategy;
 - (b) a map of the lands within the Municipality that depicts the intended future uses of the lands as contemplated by the Municipality’s municipal planning strategy;
 - (c) statements of policy with respect to the lands subject to the municipal planning strategy in relation to all of the following:
 - (i) residential uses,
 - (ii) commercial and industrial uses,
 - (iii) institutional uses,
 - (iv) recreational facilities and public open spaces,
 - (v) resource uses, where resources are present within a municipality;
 - (d) a statement of policy describing the procedures to be followed when reviewing a municipal planning strategy that must provide for public consultation and notice.

Mandatory content related to housing supply

4A (1) In this Section,

“regional centre” means the area of the Municipality identified as the regional centre on the map attached as Appendix A;

“urban service area” means the area of the Municipality identified as the urban service area on the map attached as Appendix B.

- (2) In addition to the requirements prescribed in subsection 229(1) of the Charter and Section 4, a municipal planning strategy must do all of the following to address the issue of housing supply:
- (a) include a statement of policy that expressly recognizes that the Province and, in particular, the Municipality are experiencing a housing shortage crisis and specifies that the most urgent priority in municipal land-use planning, regulation and development approval is to rapidly increase the supply of housing in the Municipality;
 - (b) require that priority be given to increasing the supply of safe, sustainable and affordable housing in the Municipality over other interests identified in the municipal planning strategy for the purposes of all processes, approvals and decisions made under the municipal planning strategy;
 - (c) permit residential uses in all zones, except for all of the following:
 - (i) areas zoned for industrial, military, park, transportation reserve and utility uses,
 - (ii) zones intended to protect the environment, water supply, floodplains or another similar interest;
 - (d) require that the Municipality share with the Province the information used by the Municipality to identify, fund, schedule and deploy the infrastructure to develop an adequate supply of housing to support anticipated population growth;
 - (e) provide for the adoption of a secondary municipal planning strategy and the implementation of a land-use by-law for the area of the Municipality identified as the suburban area on the map attached as Appendix A, or a substantially similar area, no later than January 31, 2025;
 - (f) for developments enabled under the Municipality’s Conservation Design Development policies in the Regional Municipal Planning Strategy that begin construction before April 1, 2027, determine the maximum density of a development based on a lot’s gross area and not on its net area;
 - (g) not impose maximum height restrictions in a manner that negatively affects the density of residential buildings using mass timber or any other construction method;
 - (h) for residential buildings that begin construction before April 1, 2027, provide that no requirement related to unit mix applies;
 - (i) provide that no requirement for on-site parking applies to residential uses within the urban service area;
 - (j) for multi-unit residential buildings that begin construction before April 1, 2027, not require that the ground floor consist of more than 20% commercial space;
 - (k) permit temporary housing in non-permanent structures as a use in all zones where it can be safely established to allow employees to live on or near their worksite during a work assignment for a period of time that can be reasonably tied to the duration of the project and that is explicitly set out in the development permit;
 - (l) permit manufactured housing, including modified shipping containers converted into housing, in all residential zones.
- (3) The requirements outlined in subsection (2) must be implemented no later than December 31, 2024.

Matters subject to other enactment of Province

- 5 (1) A municipality may include in its municipal planning strategy statements of policy on land use relating to any of the matters set out in Sections 6 to 13 unless the matter is the subject of another enactment of the Province.
- (2) Provided it is not prohibited by another enactment, statements of policy referred to in subsection (1) may be more stringent than another enactment.

Discretionary content related to planning tools

- 6 A municipal planning strategy may include statements of policy on the use, content, development, and administration of the following:
- (a) zoning;

- (b) development agreements;
- (c) comprehensive development districts;
- (d) site-plan approval areas;
- (e) incentive or bonus zoning;
- (f) accepting and using cash-in-lieu of required parking;
- (g) studies to be carried out before undertaking specified developments or developments in specified areas;
- (h) staging development;
- (i) non-conforming uses and structures;
- (j) subdividing land; and
- (k) regulation or prohibition of development in areas based on noise exposure forecast or noise exposure projections.

Discretionary content related to engagement

7 A municipal planning strategy may include statements of policy on engaging with provincial and federal departments, First Nations, and non-abutting municipalities.

Discretionary content related to fiscal matters

8 A municipal planning strategy may include statements of policy on any of the following:

- (a) municipal investment for public and private development and coordinating public programs relating to the economic, social and physical development of the municipality;
- (b) eligibility criteria for establishing a commercial development district including all of the following:
 - (i) the percentage increase in the taxable assessed value of the eligible properties, as defined in subsection 92C(1) of the Charter, within the proposed commercial development district,
 - (ii) the period over which the increase in the taxable assessed value of the properties occurs.

Discretionary content related to the natural environment

9 A municipal planning strategy may include statements of policy on any of the following:

- (a) climate change mitigation and adaptation;
- (b) protecting the natural environment and biodiversity;
- (c) protecting the coast;
- (d) protecting water supplies;
- (e) identifying, preserving and protecting landscape features;
- (f) stormwater management and erosion control;
- (g) excavating or filling of land, the placement of fill or the removal of soil;
- (h) identifying, protecting, using and developing any of the following:
 - (i) lands subject to flooding,
 - (ii) steep slopes,
 - (iii) lands susceptible to subsidence, erosion or other geological hazards,
 - (iv) wetlands or other environmentally sensitive areas.

Discretionary content related to social aspects

10 A municipal planning strategy may include statements of policy on any of the following:

- (a) how social issues must be incorporated into decision making;
- (b) promoting social well-being;
- (c) housing opportunities for a range of social and economic needs and to support aging in place;
- (d) promoting community food security;
- (e) accessibility standards to help prevent and remove barriers that disable people;
- (f) walkability;
- (g) healthy built environments.

Discretionary content related to resource lands, infrastructure and economic development

11 A municipal planning strategy may include statements of policy on any of the following:

- (a) protecting and using resource lands;
- (b) infrastructure including municipal services and facilities and the means of recovering their cost;
- (c) generating, using, and conserving energy;
- (d) transportation services and networks including establishing transportation reserves;
- (e) home occupations and home-based businesses.

Discretionary content related to culture, heritage and landscape features

12 A municipal planning strategy may include statements of policy on any of the following:

- (a) heritage property protection and heritage buildings;
- (b) sites of cultural, historical or archeological interest;
- (c) other significant natural or human-made features.

Discretionary content related to general matters

13 A municipal planning strategy may include statements of policy on any of the following:

- (a) public health and safety;
- (b) land use matters relating to the physical, economic or social environment of the Municipality not otherwise prescribed in these regulations;
- (c) the minimum setback required between a residential dwelling and a wind turbine;
- (d) the matters that Council must consider before approving a wind turbine development.

Wind turbine setback requirement

14 (1) Any statement of policy included in a municipal planning strategy in accordance with clause 13(c) on the minimum setback required between a residential dwelling and a wind turbine, that is part of, or located within, an energy-generating facility with a production rating of 2 MW or greater, must not require a minimum setback larger than the greater of the following:

- (a) 4 times the wind turbine height;
- (b) the distance required to ensure that
 - (i) sound levels from the wind turbine do not exceed 40 dBA at the exterior of a residential dwelling, and

(ii) a residential dwelling receives less than 30 minutes per day or 30 hours per year of shadow flicker.

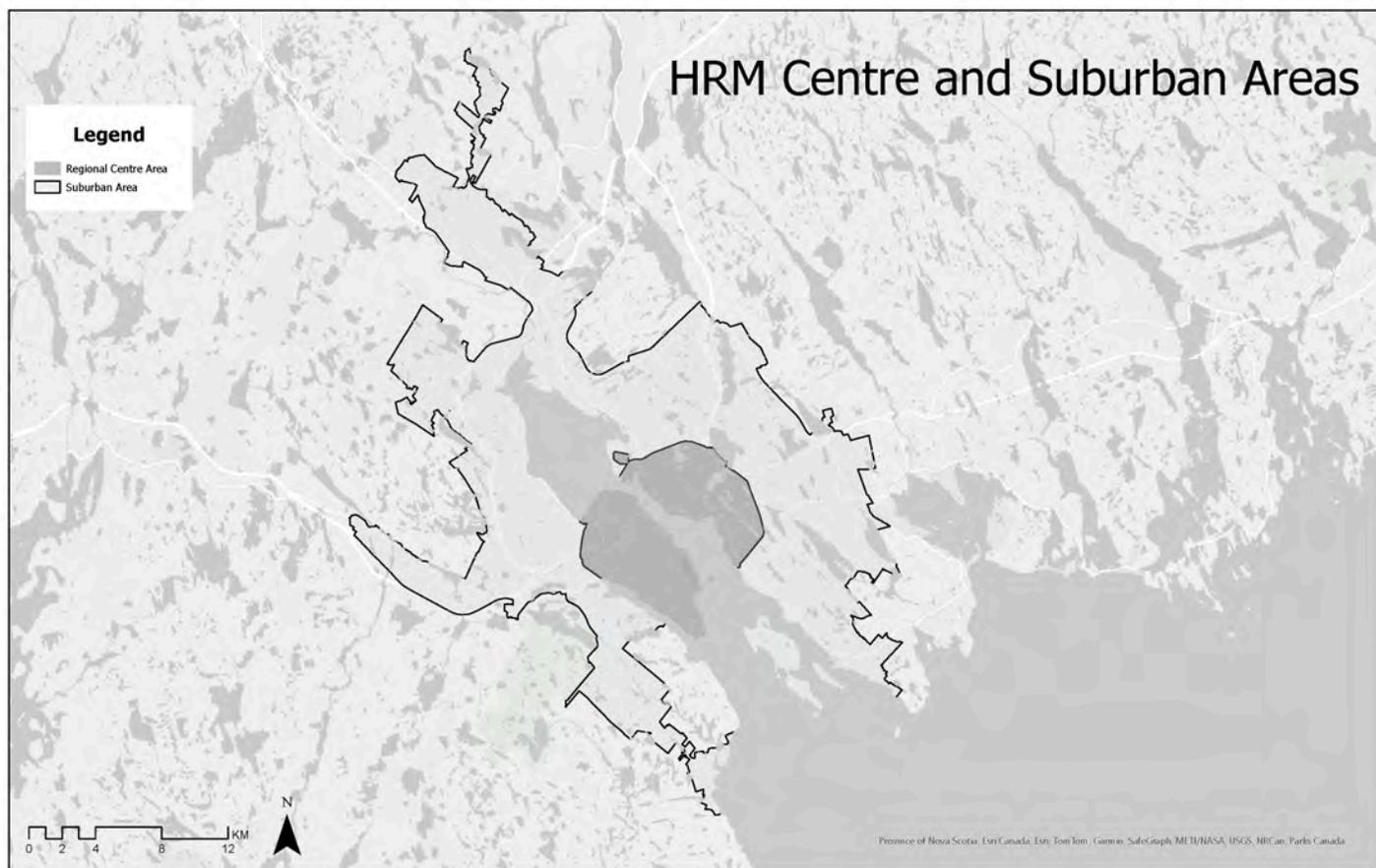
(2) For the purposes of subsection (1), wind turbine height is measured as the distance from

- (a) for a wind turbine other than a roof-mounted wind turbine, the average finished grade of the wind turbine to 1 of the following:
 - (i) the highest point of the wind turbine rotor,
 - (ii) the tip of the wind turbine blade when it reaches its highest elevation;
- (b) for a roof-mounted wind turbine, the building's average finished grade to 1 of the following:
 - (i) the highest point of the wind turbine rotor,
 - (ii) the tip of the wind turbine blade when it reaches its highest elevation.

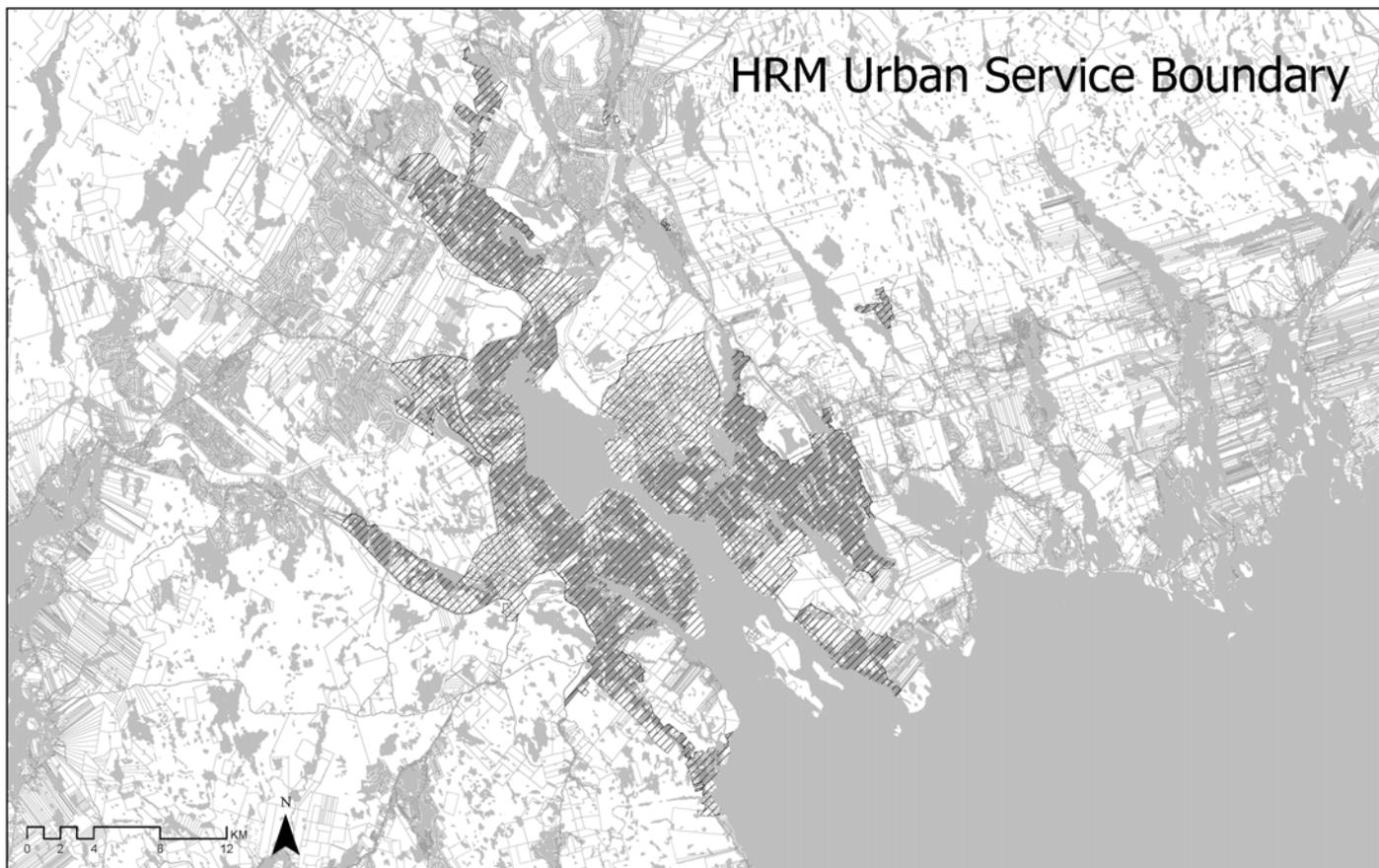
Matters considered before approving wind turbine development

15 Any statement of policy included in a municipal planning strategy in accordance with clause 13(d) on matters that Council must consider before approving a wind turbine development must not include the visual impact or aesthetic appearance of a wind turbine development.

Appendix A: Regional Centre



Appendix B: Urban Service Area



Legislative History Reference Tables

Minimum Planning Requirements Regulations
Halifax Regional Municipality Charter

N.S. Reg. 138/2019

Note: The information in these tables does not form part of the regulations and is compiled by the Office of the Registrar of Regulations for reference only.

Source Law

The current consolidation of the *Minimum Planning Requirements Regulations* made under the *Halifax Regional Municipality Charter* includes all of the following regulations:

N.S. Regulation	In force date*	How in force	Royal Gazette Part II Issue
138/2019	Dec 3, 2019	date specified (in force date of S.N.S. 2018, c. 39)	Oct 11, 2019
178/2024	Aug 21, 2024	date specified	Sep 6, 2024
205/2024	Sep 25, 2024	date specified	Oct 18, 2024
215/2024	Oct 10, 2024	date specified	Mar 21, 2025
228/2024	Oct 24, 2024	date specified	Mar 21, 2025
50/2025	Mar 7, 2025	date specified	Mar 21, 2025

The following regulations are not yet in force and are not included in the current consolidation:

N.S. Regulation	In force date*	How in force	Royal Gazette Part II Issue
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*See subsection 3(6) of the *Regulations Act* for rules about in force dates of regulations.

Amendments by Provision

ad. = added
am. = amended

fc. = fee change
ra. = reassigned

rep. = repealed
rs. = repealed and substituted

Provision affected	How affected
2, defn. of “Charter”.....	am. 215/2024 ² , 228/2024, 50/2025 ³
2, defn. of “residential dwelling”.....	ad. 215/2024; rep. 228/2024 ad. 50/2025
4(c)(iv).....	am. 215/2024, 228/2024, 50/2025
4A.....	ad. 178/2024
4A(2)(f).....	rs. 205/2024
8(b)(i).....	am. 215/2024, 228/2024, 50/2025
9(h)(iii).....	am. 215/2024, 228/2024, 50/2025
10(f).....	am. 215/2024, 228/2024, 50/2025
11(d).....	am. 215/2024, 228/2024, 50/2025
12(b).....	am. 215/2024, 228/2024, 50/2025
13(a).....	am. 215/2024, 228/2024, 50/2025
13(b).....	am. 215/2024, 228/2024, 50/2025

ad. = added
am. = amended

fc. = fee change
ra. = reassigned

rep. = repealed
rs. = repealed and substituted

Provision affected	How affected
13(c).....	ad. 215/2024; rep. 228/2024 ad. 50/2025
13(d).....	ad. 50/2025
14.....	ad. 215/2024; rep. 228/2024 ad. 50/2025
15.....	ad. 50/2025
Appendices A-B.....	ad. 178/2024

Note that changes to headings are not included in the above table.

Editorial Notes and Corrections

Note	Effective date
1 Amending instruction in N.S. Reg. 178/2024 to add s. 4A does not specify where to insert Appendix A and Appendix B, which are referred to in the Section. Appendix A and Appendix B added immediately after the end of the text of the regulations for the purposes of this consolidation.	
2 Amending instructions in N.S. Reg. 215/2024 specify amendments to the definition of “Act” in s. 2 and the placement of a new definition in relation to the definition of “Act”. The definition of “Act” does not exist in the regulations; amendments made to and in relation to the definition of “Charter” for the purposes of this consolidation.	
3 Amending instructions in N.S. Reg. 50/2025 specify amendments to the definition of “Act” in s. 2 and the placement of a new definition in relation to the definition of “Act”. The definition of “Act” does not exist in the regulations; amendments made to and in relation to the definition of “Charter” for the purposes of this consolidation.	

Repealed and Superseded

N.S. Regulation	Title	In force date	Repealed date
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Note: Only regulations that are specifically repealed and replaced appear in this table. It may not reflect the entire history of regulations on this subject matter.