October, 2023

RE: EAC comments on the draft Halifax Regional Municipal Planning Strategy

Dear Regional Planning Team,

The Ecology Action Centre has analyzed the draft Halifax Regional Municipal Planning Strategy (the Regional Plan), published in June of this year. Below we offer a summary of our comments related to major themes in the Plan and detailed comments by chapter.

Overview

→ Generally, we were impressed that the Regional Plan introduces concepts and policy language to **further implement HRM's priority plans**, mainly the Halifax Green Network Plan, Integrated Mobility Plan, and HalifACT. We are hugely supportive of these plans and want to ensure they are used to guide new growth and development in the region.

→ The Regional Plan is successful at **acknowledging HRM as a part of Mi'kma'ki**, an essential step for beginning to acknowledge Treaty and inherent rights and advancing reconciliation. We recommend working with local Mi'kmaq First Nations to further the conversation about how to use a two-eyed seeing approach in land-use planning.

→ We are pleased to see that this Plan takes a different approach (i.e. not a time-bound approach), to **plan for a future population of 1 million people**. It is no surprise that HRM is growing and experiencing unprecedented housing need and stress on our municipal services. It is imperative that we take swift action to address current needs, while also planning for this projected growth.

→ We support a target of **90% of new growth into urban and suburban areas**. Using this new growth to improve our existing infrastructure and services will help to reduce our GHG emissions and promote more walkable, sustainable, complete communities.

→ The Regional Plan is also successful at **introducing planning concepts like 'missing middle housing'** to help promote building more dense communities. We envision communities with diverse housing options, active and public transit, essential services, and access to nature. Firm standards for complete communities need to be developed and growth and development decisions should be made accordingly.

→ There is stronger acknowledgement of the benefits of natural ecosystems and natural assets like **wetlands, watercourses, parks, and wilderness corridors** in this plan. However, questions remain about how these natural assets will be prioritized when reviewing development decisions, and conflicts between plan priorities and development rights will be resolved.

→ Our main concern is with **implementation tools**, and the ability of staff and Council to move from plan to action. We want to ensure this Regional Plan provides firm guidance and actionable implementation to **discourage growth where it will cause harm, protect valuable greenspace, and promote more sustainable development** that will help us achieve a more affordable, healthier, and sustainable future.

EAC comments on the draft Halifax Regional Municipal Planning Strategy

Detailed comments by Chapter

Chapter and Sections	General Comments	Specific Recommendations
Chapter 1: Introduction 1.1 Regional Context 1.2 Regional Vision and Principles 1.3 Plan Organization 1.4 Relationship to Other Plans 1.5 Provincial Role in Planning 1.6 Interpretation	• Good that there is now an acknowledgement of ancestral lands of the Mi'kmaw and Black Nova Scotians, and commitment to reconciliation. However, mentioning *Etuaptmumk* (Two-Eyed Seeing) could be viewed as tokenism unless it is truly pursued and implemented. • Although the "Regional Context" section does provide many contexts through which to view the past of HRM, it doesn't include anything about the natural history context of HRM. • EAC supports accelerating the Community Plan & By-law Simplification Program; it is essential to modernize planning policy with good science and implement HRM's priority plans. • **Vision**: "The Municipality's vision for the future is to enhance our quality of life by fostering the growth of healthy and vibrant communities, a strong and diverse economy, and sustainable environment." This is a good vision that centers quality of life, and how HRM can impact it, however, the rest of the document doesn't link to quality of life well. • Definitions of "may," "shall," and "shall consider" are now included in the Regional Plan. This is helpful and will provide clarity for all.	• Work with HRM staff and representatives from Mi'kmaw communities to further the conversation about how to use a two-eyed seeing approach in HRM planning and property management. • Consider using "ancestral and unceded" lands. • Include a section on the natural history of HRM. • Recommendation to expand on quality of life/well-being as justification for building healthy, well serviced, and connected communities. • Determine indicators of quality of life in HRM, and commit to measuring and reporting on those. These should be aspects of quality of life that are impacted by elements within the control of HRM. HRM should go beyond how quality of life is described in the Economic Strategy. • EAC recommends adopting "shall demonstrate consideration of" so that the public can better understand how and why decisions are made, especially around conflicting land uses. • Table 2: Draft Regional Plan Summary: "Increasing required buffer distances around watercourses and wetlands" should be changed to "watercourses and *some* wetlands." The proposal suggests buffers for only certain wetlands, so the phrase used in the introduction table feels misleading.

Chapter 2: Planning For Our Region		
Chapter 2: Planning For Our Region	• **Regional Planning**: Excellent that the text here recognizes that planning for communities' access to nature needs to be considered. Also, great that one of the four areas of critical regional-scale services that need to be analyzed when planning for growth includes natural services. • **Policies RP-1 to RP-5** are strong start to the plan - Using the green network to shape where new development is located, direct housing and employment growth into already serviced areas, alignment of density with transit. • **RP 10**: What is meant by underutilized? We must be careful these are not "undeveloped" wild lands that are already busy providing important ecosystems services. • **2.5.3 SERVICE AREAS (RP-14):** Defines "Urban Area" as that which "is serviced with municipal water, wastewater and stormwater services and conventional transit services". However, according to Map 3, there are areas which are not yet serviced included (I.e., Sandy Lake). Either the policy or the map needs to be revised. Other descriptions of Map 3 "several areas are shown on Map 3 as Future Serviced Communities, where new residential, commercial or industrial development **is expected to be serviced** with municipal water, wastewater and conventional transit services". • Future growth nodes should have a rationale, and this rationale should be documented by HRM. For future growth nodes to be strategic, some existing ones may need to be removed. • **RP-12:** Support for planning for 1 million people and in perpetuity (not a fixed timeline). • **RP-19 and RP-20**: Looking forward to seeing a *Strategic Growth and Infrastructure Priority Plan*. • **RP-21:** Support an *Open Space and Natural Resource Designation* to identify both public and private lands crucial to the green network.	• Consider an acknowledgment that living things other than humans reside in HRM, and this is valuable to biodiversity. • In talking about natural services, we recommend using the phrase natural assets to align with HRM existing/on-going work (e.g. MNAI). • **RP-1**: perhaps define which aspects of ecosystem health HRM is willing to protect and conserve, or use the term natural assets. Also, should RP-1 perhaps state that the green network will be used to help shape where development will NOT be advanced? • **RP-9** (The Municipality shall encourage most new housing and employment to locate in the Urban Area of the municipality) AND **RP-13** (It is the intent of this Plan to direct approximately 90% of new housing units to the Urban Area) are repetitive - **RP-13** is a stronger and clearer target. • **RP-10**: define underutilized land and clarify that it does not mean undeveloped. Also reduce the number of future growth nodes and provide rationale for the current and future growth nodes. • Also, **RP-10 and RP-13** will require education/engagement to bring current residents along (anticipating a lot of discomfort with this change), this work is not reflected in the Regional Plan. • **2.5.3 SERVICE AREAS (RP-14)**: It is the intent of this Plan to direct housing and employment growth to the Urban Area, which is serviced **or expected to be serviced** with municipal water, wastewater, and stormwater services and conventional transit services. • **2.6 LONG TERM GROWTH:** This section could be strengthened by acknowledging that there are limits to what the lands, waters, and ecosystems of HRM can support regarding human population growth. A blind lack of recognition of the

• Open Space and Natural Resource Designation – It is good that the draft RP recognizes in this section that we now know more about the benefits of leaving nature intact. But this section needs to make a stronger link about what to do with this knowledge. • **2.7.1 OPEN SPACE AND NATURAL RESOURCE DESIGNATION**: Wonderful that this section recognizes trail systems as key parts of the open space network, and NGOs as key partners in those. This section also does an excellent job of describing the open space network as partly for recreation but also helpful in providing ecosystem services.	natural limits to exponential growth is part of what has led to the climate change and biodiversity crises. • **2.7.1 OPEN SPACE AND NATURAL RESOURCE DESIGNATION**: The designation could make more explicit that because of our newer understanding of the value of leaving ecosystems intact, this means we need to use HGNP to inform where development should not go. • Suggested wording changes for **RP-21**: Wilderness Areas and Nature Reserves are usually capitalized, "including private conservation lands" should instead be its own phrase (not linked to WA and NR) and should be "land trust conservation land." "Areas of protected habitat" is not specific in Nova Scotia – this could be changed to "critical habitat and core habitat for species at risk" but **this has legal implications for HRM.** Also, this section doesn't specifically mention wetlands, but could (it does list salt marshes, which are a type of wetland). • **Rural Resource Designation** – Define what is meant by "protect the natural resource base". • **Agricultural Designation** – Clarify why renewable energy is classified under this designation and grouped with natural resource-based activities (farming, forestry, mining). This is not how renewable energy projects are classified at the provincial level.

| **Chapter 3: Building Healthy and Complete Communities**
3.0 Introduction
3.1 Objectives
3.2 Community Planning Framework
3.3 Regional Centre Plan
3.4 Suburban Community Planning
3.5 Rural Community Planning | • **Objectives**: Excellent to have complete communities as #1 Objective, but this language could be strengthened. Objective #2 could be followed through on by linking changes in design guidelines, and conditions in development agreements, to climate change mitigation and adaptation.
• **Community Planning Framework**: Urban Area Land Use. The section on Open Space rightly lists several of the benefits of open space in the Urban Area, but should also highlight the ecosystem benefits of some of our open space.
• **Centre Plan**: Does not state access to nature as one of the four Core Concepts, but it is in the Core Concepts diagram (note the trees), and in the Guiding Principles (number V, as access to parks). The aspects of the Centre Plan quoted here don't emphasize enough access to *nature* (not just parks), and the value of having intact ecosystems to provide ecosystem services in the Urban Area.
• Excellent that when Open Space is being planned for in suburban planning processes, "preserving, rehabilitating and restoring natural system functions" will be a planning principle.
• **HC-3**: Any changes to the designation of land in these plans should consider more than just housing and population projects when being changed -- including transit, traffic, open space and park, natural assets, and wildlife corridors.
• **HC-4**: EAC supports accelerating the development of a *Suburban Secondary Municipal Planning Strategy and Land Use By-Law*; a streamlined plan for HRM's suburbs will be essential to avoiding urban sprawl and intensifying already serviced communities.
• Many of the regional ecosystem services are found in the suburban area. They need to be kept relatively intact for the good of the whole region. This is also an area where the traditional form of communities has had an exceptional large negative impact on ecosystem services and features, such as | • **Objective: #1**: Strengthen this by replacing "lens" with "principles."
• **Objective #2**: Following through on this in design guidelines, development agreements, and "Red Book".
• **Urban Area Land Use** – add to explanation of the Open Space designation that "protected and sensitive open space lands… contribute to sustaining vital ecosystem services."
• **Centre Plan updates** – As the Centre Plan is referred to and updated (HC-1 and HC-2) emphasize the value of access to nature, and intact ecosystems, in the Regional Centre.
• Would like to see more explanation of the impact of existing growth on ecosystems in the suburbs, and the need to conserve and restore what's left.
• HGNP should be named specifically in the Suburban Growth Areas section, as it is in the Rural Community Planning section. It will need to be considered when selecting or changing Suburban Plan Growth Areas.
• Would like to see justification for chosen Growth Areas/Centres, including both the rationale that was used to select them in the past, and how they measure up to the current RP's objectives around where to place housing development and why.
• Would like to see justification for bringing forward the Future Serviced Communities.
• **HC-8 f)** May need to change wording to Protected Areas (there are no federal wilderness areas, for example).
• **HC-8 h)** "the adequacy of public parks, open spaces… " could be strengthened and made more versatile by adding Protected Areas.
• **Rural Community Planning** – Should not use the term "wilderness areas" here as that has a specific meaning. |

	large, sprawling developments that destroyed wildlife habitat and caused habitat fragmentation. There may also be impact on water supply due to wide-spread forest clearing and impacts on waterbodies and wetlands. • Potentially concerned with how "Future Serviced Communities" are described (pg. 43) "some of these areas have also been identified as provincial Special Planning Areas under the 2021 Housing in the Halifax Regional Municipality Act" indicates they were forced to list them, without providing solid justification for why they were chosen/listed. The language around Future Serviced Communities makes it seem like they are foregone conclusions for development. Other language by HRM staff and Council has been these areas will be considered for development, including after considering growth targets. • **HC-8 e)** It is a step in the right direction to consider "measures to reduce the risk and impact of wildfire through site and building design and infrastructure". • **HC-8** Also good: "the integrity of regional parks or federal and provincial wilderness areas adjacent to the lands are maintained and buffered, including the functioning of shared environmental, recreational or cultural features;" but may need to change wording *(See specific recommendations)*. • Development Outside of Rural Centres: Another downside of ribbon development is that it causes future wildlife habitat fragmentation.	

| **Chapter 4: Strengthening Community Infrastructure**
4.0 Introduction
4.1 Objectives
4.2 Parks
4.3 Community Facilities
4.4 Libraries
4.5 Schools
4.6 Public Safety and Emergency Services
4.7 Food Security
4.8 Solid Waste Management
4.9 Regional Energy and Telecommunications Infrastructure | • **Objectives**: We support the objective of "Support the protection, acquisition, and management of the significant natural or cultural resources in regional parks," but this doesn't have to all be done through Regional Parks. Suggest broadening the wording.
• We are really happy to see the more explicit than ever recognition that the park system contributes to ecological connectivity and climate resilience. What is missing here is discussion of how the park system helps with biodiversity conservation and restoration too.
• Fantastic to see the commitment to a park system strategy/plan! This section could say more about how the plan for parks will integrate planning to support ecosystem services (e.g., MNAI work).
• Excellent to see that a level of service standard for parks will be established and will use an equity lens. HRM should recognize that recreational and access to nature amenities are not all provided by HRM – some are provided on lands managed by other levels of governments, and other institutions. These assets should be factored into park system planning.
• It is good that this section refers to the park spectrum, but it would be better to commit to trying to provide all residents with access to parks along the full spectrum, and the parks spectrum needs to be further defined.
• Parks and Open Space, Map 13 from Themes and Directions – Will this map be brought forward? Of note, it has errors in it.
• Assuming Nature Parks are what were called Wilderness Parks in Themes and Directions – What happened to the discussion of the Western Common Wilderness Common as a Wilderness Park (it is not listed as a Nature Park but the others are)?
• Good to see **CI-6** regarding the unique fire-prone ecology of the Backlands and limiting development there. This will also | • **Objective 3**: Includes as an Objective: "Support the protection, acquisition, and management of the significant natural or cultural resources in regional parks." Suggest wording change to "… resources in regional parks and other conservation areas" or "… in regional parks and beyond."
• **4.7 PARKS**: "Parks are an important component of the Green Network." Not everyone knows what this is, and is not something official. Suggest: "Parks are an important component of the Halifax Green Network Plan." This should be changed in subsequent paragraphs too.
• **CI-2 b)** "Coordinating and managing a program to research and identify potential public open space parks and corridors for the provision of quality open space for recreational and social development, restoration of natural corridor and urban ecosystem function, greenway networks to connect communities and provide mobility options and significant natural habitats to guide considerations of future development;" This could be clarified/strengthened by:
  o "restoration of natural corridor**s**…"
  o "significant natural habitats, wildlife corridors,…"
• **4.7 FOOD SECURITY**: Paragraph one should note income as the key determinant of food security.
• **4.7 FOOD SECURITY**: Paragraph 2 statistics can be updated. The most recent food insecurity data for the Halifax region, released in 2019, showed the prevalence of household food insecurity within HRM was 18.6%. At that point in time, the average rate of household food insecurity was 16.4% across Canada's 10 provinces and 21.3% across Nova Scotia, showing individuals residing in Nova Scotia had some of the highest food insecurity rates in the country. More recent statistics show that, as of 2022, the average rate of household food insecurity across Canada's 10 provinces was 18.5% and within Nova Scotia was 22%. With rates of household food |

reduce the risk of future fires impacting housing and infrastructure.

- **CI-8** A "parkland and outdoor asset needs assessment" could inform divestment, in which case it should provide rationale for any park divestments that are proposed.
- **CI-9** Not all parkland should come with the expectation that public access will be facilitated. HRM needs to acquire land, as parkland and other land management types, where public access should not be facilitated because the natural assets at the site are best maintained through not facilitating access. For example, some riparian buffers, or sections of them, should not have trail or other infrastructure development to keep them completely intact and performing their ecosystem services such as reducing flooding, absorbing excess nutrients, and providing wildlife habitat connectivity.
- **4.3 COMMUNITY FACILITIES** – This section should also speak to the need to consider climate change and biodiversity when planning for and maintaining HRM facilities. There is the opportunity here to commit to examining how new and existing facilities could reduce their impacts on climate change and biodiversity.
- **4.7 FOOD SECURITY**: We appreciate the Municipality's focus on improving food insecurity, as we require significant coordinated action in this area. However, we must also focus on strengthening our food system, using a more holistic and transformative lens. The language used in this section should reflect the importance of building a strong regional food system. We suggest content that speaks to the following (as noted in the JustFOOD Action Plan): "A strong regional food system can reduce food insecurity and inequities, support the livelihoods of producers and food workers, support inclusive economic growth, enhance our ability to mitigate and adapt to climate change, and promote the health and well-being of all residents."

insecurity increasing nationally and provincially, it can be assumed food insecurity has worsened within HRM as well.
  - https://proof.utoronto.ca/2023/new-data-on-household-food-insecurity-in-2022/
- **4.7 FOOD SECURITY: (CI-22)** "may be" should be replaced with "shall be".
- **4.7.2 URBAN AGRICULTURE:** "The secondary processing and distribution of food in the form of preserved and pickled food products" should be revised to "The secondary processing and distribution of food" to preclude unnecessarily strict limitations on the forms of processed foods that may be permitted (including foods processed through milling, baking, refining, etc.).
- **4.7.4 INDOOR FARMING (CI-30)**: "development agreement" should be replaced with "site plan approval" to reduce barriers to indoor agricultural food production.
- **4.9 REGIONAL ENERGY AND TELECOMMUNICATIONS INFRASTRUCTURE (CI-38):** "... in their efforts to conserve energy, anticipate and provide for future electricity needs, increase reliability..." recommend this be expanded to include "... in their efforts to conserve energy, incorporate more renewables and storage on the electricity grid, anticipate and provide for future electricity needs, increase reliability..."
- **4.9 REGIONAL ENERGY AND TELECOMMUNICATIONS INFRASTRUCTURE (CI-39):** Would encourage that this is expanded to include residential areas in addition to commercial areas and heritage districts. In recent extreme weather events downed lines and fires at key connection points on electricity poles have caused significant delays in the ability to restore power for residents, which result in significant personal costs to residents.

- **4.7 FOOD SECURITY (CI-22):** It is promising to see new secondary municipal planning strategies "may" consider means of furthering food security. However, a stronger commitment should be made here *(See specific recommendations)*.
- **4.7.1 RURAL AGRICULTURE**: We support the preservation and expansion of rural agricultural land, recognizing that supporting local food production is critical to strengthening our regional food system and improving food security. When expanding agricultural land, the Municipality should ensure that environmentally sensitive or important areas are protected from potentially harmful agricultural use.
- **4.7.2. URBAN AGRICULTURE**: We are happy to see HRM acknowledge that it has a responsibility to enable more residents to produce and sell their own food in their communities.
- **4.7.3 GREEN ROOFS**: We are happy to see that HRM will allow green roofs to protrude above the maximum permitted height for main buildings. HRM should develop further mechanisms to incentivize developers to include green roofs and other food production spaces and amenities to promote more complete communities.
- **4.7.4 INDOOR FARMING**: We are happy to see that the indoor farming of plants and insects will be permitted as an appropriate use in industrial zones, and we are happy to see that the use of shipping containers will be permitted in both industrial and agricultural zones. Although we are excited to see that shipping containers may be considered in commercial and mixed-use zones, we believe a development agreement is an unnecessary barrier here. A site approval plan would suffice *(See specific recommendations)*.
- Seafood is an important component of our food system, and we hope to see the Municipality permit on-land closed-containment fish farms, where appropriate, as a sustainable alternative to open net-pen fish farming.

| **Chapter 5: Fostering Diverse and Affordable Housing**
 5.0 Introduction
 5.1 Objectives
 5.2 Removing Barriers to Housing
 5.3 Increasing Our Housing Supply
 5.4 Increasing Housing Affordability | • **Introduction**: Important to have clear definitions of market vs. non- market housing, affordable housing, gentle density, shared housing, and missing middle.
 • **Objectives**: Great to see more sustainable development patterns being prioritized like transit-oriented, adaptive reuse, less parking, and focusing on missing middle.
 • **Objective 5**: Great to see support for intensifying areas with access to transit and services in already established communities.
 • **5.2.1 BUILDING DIVERSE HOUSING TYPES (H-3)**: EAC supports accelerating work on enabling policies for the construction of affordable housing, cohousing, and land sharing initiatives; Our collaborators in the non-profit housing space feel cohousing and land trusts are underexplored solutions to delivering on non-market housing alternatives.
 • **5.2.1 BUILDING DIVERSE HOUSING TYPES (H-9)**: This is great. Allowing 3+ units in low-density residential zones will improve opportunities for missing middle housing.
 • **5.2.4 REDUCING MINIMUM PARKING REQUIREMENTS (H-12):** Remove minimum parking requirements altogether – Parking should not be a prerequisite to residential development.
 • **5.3 INCREASING HOUSING AFFORDABILITY:** We support accelerating work on inclusionary zoning, density bonusing, and no net loss housing policies.
 • **5.3.2 INCENTIVE OR BONUS ZONING:** There are many examples (e.g., Detroit) where community/public benefits are negotiated with input from the surrounding local community. Consider a provision for public engagement in this process for projects valued over a specific amount, to ensure public benefits meet local needs. | • **5.2.1 BUILDING DIVERSE HOUSING TYPES**: Speaks to housing need for multi- generational families, seniors looking to age in place, students, and young people – Some supportive data on what types of housing HRM is most in need of, might be helpful here.
 • **5.2.4 REDUCING MINIMUM PARKING REQUIREMENTS (H-12):** the Municipality shall ~~consider reducing or~~ remove parking minimums for residential developments, especially where transit exists or is planned.
 • **H-18**: Council shall require incentive or bonus zoning public benefits for new multi/mixed-use development – Define what types of public benefits. |

| **Chapter 6: Protecting the Environment and Acting On Climate**
6.0 Introduction
6.1 Objectives
6.2 Protecting And Connecting Our Green Spaces
6.4 Protecting Our Water
6.5 Acting On Climate Change | • **Introduction**: The concept of *Netukulimk* is invoked here but is tokenism if there at not proposed pathways to actually work incorporating Netukulimk as a guiding value into both gathering of knowledge, and decision-making. For example, cooperation with the Mi'kmaw could be an Objective in section 6.1.
• The Introduction speaks to the value of watersheds as a planning framework, but... Watersheds as planning units are not discussed in the Objectives section. Why not? There is other, vaguer wording in this section about "foster a land management approach…" and "adopt development practices that sustain and nourish air, land, water…" Watershed-level planning and management provides a concrete way to achieve these objectives.
• A Regional Green Network – This section does a good job of explaining the multiple values of a greenbelt. Policies EC-2 to EC-7 are good in principle, but need some refining (*see Specific Recommendations*, but also talk with NSECC Protected Areas Branch, NCC, and NSNT).
• **Map 6**: How were High Ecological Value Areas defined? Why are large sections of Wilderness Areas not considered High Ecological Value? Why do some of the corridors follow different routes than both the HGNP and the wildlife corridor charrette? The corridors drawn in Map 6 miss some actual corridors that need protection.
• New Corridor naming (Essential Corridors) is confusing because the HGNP used the same name to identify different corridors. Also, why was this new corridor exercise needed?
• Naturalization and MNAI – We are so pleased to see the naturalization work, and the MNAI work, being continued after their first few years. EC-15 would be strengthened by calling for a naturalization strategy. This could link the mentions of naturalization in the HGNP and HalifACT to how | • Section 6.2 and 6.3 – There is a numbering problem in this section (no section 6.3)
• **EC-1** "… shall be considered…" is not strong enough wording to implement the HGNP. There are examples already of this wording not resulting in actual use of the HGNP in decision-making.
• A Regional Green Network – Remove the word "inaccessible;" it doesn't make sense here.
• **EC-2** HRM should use other sources as well to identify areas important for biodiversity and climate change mitigation other than the HGNP.
• **EC-3** Prohibits residential development on new roads within the Open Space designation. Could this policy and bylaw also restrict new road construction, and/or, could other forms of development (industrial) be restricted?
• **EC-5** Protected Area Zone should perhaps be called Conservation Area Zone instead, since Protected Area has a specific, legal meaning in Nova Scotia. In this policy we suggest removing "private conservation organizations." All non-governmental conservation organizations could be covered under "non-profit conservation organizations" (better labeled "not-for-profits conservation organizations").
• **EC-6** should allow landowners to donate *or sell* a portion of their property for conservation purposes. Clause a) should say "shall be legally protected for conservation purposes only." This is important.
• **EC-7** This policy could clarify that lands acquired for conservation purposes could be acquired and managed separately than land acquired as part of the parkland dedication. It may need to be clarified if HRM has the power under the Halifax Charter to do this.
• **EC-8** Refinement of the HGNP corridors – does this matter if new corridors (which implementation direction) have been |

they can actually be supported on the ground, AND work in insights from the MNAI work.

- **6.3.3 NATURALIZATION AND MUNICIPAL NATURAL ASSETS MANAGEMENT (EC-16):** Is too vague and needs to be elaborated upon.
- **6.3.4 URBAN FORESTS (EC-17):** Has "shall consider" been working out well for the urban forest? If not, use stronger wording.
- **6.4.2 WATERSHED MANAGEMENT (EC-18):** Developing a Watershed Management Framework is excellent, and the twelve considerations outlined are important. HRM must ensure that these considerations are actionized. EAC looks forward to collaborating with HRM on the framework's development. As development progresses and the framework is actionized, HRM should seek advice and input from the Regional Watersheds Advisory Board.
- **6.4.6.1 RIPARIAN AREAS (EC-24):** This is a great initiative, and is an improvement from the HGNP recommendation of only increasing the buffer for watercourses wider than 50cm. Now all watercourses will have a 30m buffer.
- **6.4.6.2 WETLANDS (EC-33):** This is great. The municipality can play a key part in ensuring certain wetlands are never altered by helping the Province to identify local WSSs.
- **6.4.6.2 WETLANDS (EC-35):** Working with the Province on wetland protection and restoration is key. It's great to see the desire of government to work together with different levels of government on important environmental issues such as wetlands.
- **6.5.3 STORMWATER & FLOODING (EC-41):** This is a great initiative. Included in the nature-based solutions that will help prevent flooding should be trees/tree cover, promotion of plants native to Nova Scotia, and protection/restoration of wetlands.

defined? Change "shall consider" to "demonstrate consideration of."

- **EC-9** This will only work if other agencies have a map layer of the areas HRM would like to keep intact for wildlife habitat connectivity.
- **EC-11** could be improved by adding to clause iv) "…landscaping requirements that promote a high percentage of open space and permeable surfaces that are supportive of wildlife habitat."
- EC-13 could be improved by:
  c) "consider opportunities to dedicate or acquire parkland *or conservation land*…"
  d) "consider opportunities for wildlife crossings over, *under, or along* transportation infrastructure…"
- **EC-14:** Why is this very specific policy here?
- **6.4.6.1 RIPARIAN AREAS:** The plan should define buffer vs. setback. Multiple definitions exist for these two terms. HRM should clarify what is meant by buffer and what is meant by setback. If they are being used interchangeably, this should be communicated. This observation is regarding not just this specific section of the report, but the entirety of the Regional Plan.
- **6.4.6.1 RIPARIAN AREAS (EC-24):** It is not acceptable that only some wetlands will have a 30m buffer. This 30m buffer should be applied to all wetlands, not just wetlands that are contiguous with watercourses or identified as a Wetland of Special Significance (WSS) as stated in EC-34. In order to do this, HRM should include wetlands as part of the definition of watercourse. This will not only support the climate change adaptation capabilities of wetlands (e.g., flood mitigation), this will help protect and maintain health wetlands throughout the HRM, and in turn, healthy watersheds, ecosystems, and communities.

6.5.4 FLOODPLAINS (EC-51): Far too broad language in "adequately flood proofed". **6.5.5 COASTAL PROTECTION (EC-56)**: This is an excellent initiative and should be fast-tracked. **6.5.5 COASTAL PROTECTION (EC-61)**: Excellent intention but needs stronger language than "may encourage". Coastal armour stone and seawalls on their own and without proper design damage surrounding properties by increasing erosion rates, and accelerate the destruction of beaches. **6.5.8 WIND ENERGY (EC-75)**: Good to have this in place. Industrial-scale projects, like wind farms, are incompatible with what is trying to be achieved through Regional Parks, Conservation Areas, etc.	**6.4.6.1 RIPARIAN AREAS (EC-25)**: Any of the structures listed in this section should only be developed in an environmentally sensitive manner. **6.4.6.2 WETLANDS**: HRM should make efforts to collect data on wetlands in the municipality. Specifically, HRM can work with the province to monitor and collect data on wetland mapping and monitor changes overtime. This will help the municipality to better understand how much wetland loss is occurring, and where in the municipality it is occurring at higher rates. This in turn can help guide future changes to how HRM (and the Province) works to better protect wetlands. **6.5.3 STORMWATER & FLOODING (EC-41)**: The municipality should also support training initiatives so that residents and professionals in the field are knowledgeable and skilled in the maintenance and upkeep of these naturalized features **6.5.4 FLOODPLAINS (EC-51)**: Define specific criteria for what constitutes "adequately flood proofed", do not leave these criteria open to interpretation. **6.5.5 COASTAL PROTECTION (EC-61)**: The Municipality *shall* encourage maintaining, protecting and/or restoring natural coastal ecosystems, encouraging use of nature-based and/or hybrid infrastructure on coastlines, and minimizing the use of hard infrastructure on coastlines such as armour stone and seawalls through best management practices, public education, and guidebooks. **6.5.5 COASTAL PROTECTION**: Add regulations to limit the amount of lineal shoreline that may be covered by seawalls and specify that any hard infrastructure be used in a way that reduces impact on surrounding properties to the highest extent. **6.5.7 RENEWABLE ENERGY (EC-70)**: Would encourage a change to "To support renewable energy sources and reduces reliance on fossil fuels in the development of different sites, the Municipality "shall" as opposed to may.

		- In provision b, suggest replacing 'encourage new developments' with 'require new developments' - In provision c, suggest extending this to state "identify opportunities to capture and redistribute waste energy, and encourage combined heat and power systems which minimize GHG emissions." - In provision d, suggest extending this to state "develop, promote, and incentivize net-zero building design practices in line with highest energy performance tiered of the federal National Building Code 2020 **6.5.7 RENEWABLE ENERGY** – Would also like to see the municipality partnering on direct investment, providing incentives, or exploring other ways to empower other stakeholders to develop renewable and efficiency projects added to this list.

Chapter 7: Transforming How We Move In Our Region

7.0 Introduction
7.1 Objectives
7.2 Integrated Mobility Plan
7.3 Setting Targets and Measuring Progress
7.4 Regional and Community Mobility
7.5 Complete Communities and Streets
7.6 Transportation Demand Management
7.7 Active Transportation
7.8 Public Transit
7.9 Curbside Management
7.10 Goods Movement
7.11 Looking Beyond: The Future Of Transportation Planning

- **Introduction**: "Transportation and land use planning are inseparable, and the decision-making process for both must be integrated." – We strongly support this.
- **7.3 SETTING TARGETS AND MEASURING PROGRESS**: Applaud completing the first regular update of the Household Travel Activity Survey; non-commute travel data is difficult to collect but worth the effort to better understand mode-share throughout the day.
- **M-5 i)** The Municipal Design Guidelines were just updated in 2021, but iterative updates would help implement accessibility lessons learned sooner.
- **M-5 n)** Considering parallel corridors in Complete Streets projects will recognize more impacts and opportunities, which is good.
- **M-12** Applaud specific policy direction to consider opportunities for improving regional and inter-regional passenger services of all modes.
  - Transit tickets should be available for sale at the airport; they used to be but are no longer available.
  - Allowing motorcoaches and rural transit in bus lanes is good, HRM's bus lanes should have capacity to spare even with BRT, allowing (inter-)regional transit to use existing transit priority measures.
  - Consideration of future passenger rail when planning next to railways is encouraging.
- **M-14** "reviewed from time to time" is vague, but defining a frequency for updating Municipal Design Standards might be too restrictive and delay adding lessons as they're learned.
- **M-17** Formal enabling policy for dedicating streets or portions of streets as car free zones is encouraging.
- **M-24** Reduced parking requirements where bike parking, car-share, and other TDM measures are provided is encouraging.
- **M-27** Protecting existing and planned AT routes, requiring developers to build abutting planned AT routes, and requiring

- Adding Vehicle Kilometers Traveled (VKT) generation limits in Land Use By-Laws would integrate TDM into land use planning.
  - California's SB 743 required VMT reduction tools be integrated in Land Use By-laws by 2020, many tools have been developed, implemented, and refined since 2013.
  - There are websites of case studies from Californian municipalities of all sizes https://www.sb743.org/
- **7.7.3 MICROMOBILITY**: "appropriately managed" micro mobility is vaguely worded, specific tools or examples would be appreciated. Dock-based shared micromobility services and secure parking for scooters and skateboards in addition to bikes will give more people more options for accessing (rapid) transit services/stations.
- **M-37** Not subjecting transit facilities to zoning requirements/restrictions will speed up implementation of BRT, but communicating the purpose/impact of this policy direction should be done carefully. I.e., this is not to enable large park and rides lots in residential areas, but rather to allow right-sized BRT stations at all scales.
- **7.9.1 PARKING**: A dedicated Rural Mobility Hub program with funding for at least 3 rural mobility hubs with bus shelters and EV chargers, 5 years of evaluation, and the development of a design guideline to capture and share lessons learned would be a reasonable minimum viable commitment to put the concept into action.
- **7.10 GOODS MOVEMENT**: The business case for the Highway 107 Extension (Burnside Expressway) is unclear
- **M-46 a)** Leveraging available technologies to enable shifting more types of container movement towards rail will hopefully reduce freight traffic and emissions through Downtown.
- **M-46 c)** Any intensification of port related activities on underutilized land in Woodside should require a community benefit agreement; this may be a way of funding

		new developments be connected to AT routes; it's good to see these codified.	connections between the Regional Centre AAA Bikeway Network, Eastern Passage, and the Shearwater Flyer Trail.
		• **M-30** HRM has a backlog of sidewalk projects that public works staff estimate at $400-600 million, requiring developers to construct or cost-share off-site sidewalks for the pedestrian trips they generate will help address this backlog faster.	• **M-46 e)** Considering the spatial needs of trucks in Complete Street projects on designated truck routes is a good thing to codify.
		• **M-32** Suburban communities need their own AAA bikeway networks. Connections to the Regional Centre AAA network would be ideal, but may be limited by topography in some contexts; all-season AAA bikeway connections to rapid transit will suffice.	
		• **7.7.3 MICROMOBILITY**: Considering "appropriately managed" micromobility as part of solving the last mile problem is encouraging and will give more people more options for accessing (rapid) transit services/stations.	
		• **M-37** Permitting public transit facilities in all zones will speed up implementation of BRT.	
		• **7.9.1 PARKING**: Rural mobility hubs with park-n-ride/carpool lots, bus shelters, parcel pick-up/drop-off, and EV chargers are a good idea; much discussed within communities, but few examples of implementation locally.	
		• **M-43** Enabling policies in secondary planning strategies for modular housing and pop-up services/events on surface parking lots is encouraging.	
		• **M-44** Prioritizing accessible parking when allocating space for curbside parking is good to codify for equity and inclusion, but consideration of the spatial needs of universally accessible parking spots should be included in the wording. It's good to allocate preferred locations for accessible parking, but if there isn't room for curb cuts or buffers to enable driver-side, passenger-side, and rear-loading access for wheelchair users then the space is not "accessible".	

Chapter 8: Driving Economic Prosperity		
Chapter 8: Driving Economic Prosperity 8.0 Introduction 8.1 Objectives 8.2 Economic Strategy 8.3 Mixed Use Communities and Mixed Employment Centres 8.4 Industrial Employment Lands 8.5 Rural Employment Lands 8.7 Tourism 8.8 Inclusive Economic Prosperity	• Prioritize well-being over GDP as a measure of economic success -- In a thriving ecosystem, abundance and collective well-being are just as important as productivity. Our own systems should be no different. The current economic system (one that depends on perpetual growth through the exploitation of nature and labor for profit) is more than unsustainable; it is simply not possible on a finite planet. • Using productivity and consumption levels (GDP) as our sole measure of economic success is not enough to meet the needs of all people, and threatens to push us past the planet's ability to sustain us. Building a better normal requires us to redefine economic success, measuring and placing value on collective well-being, health, and sustainability for all people and the ecosystems we depend on. We need an economic system that values what matters most and serves the future we want to create. • **8.4.5.2 WATER LOTS (EP-22)**: Great start in preventing development on waterlots, but waterlot infilling itself must be regulated and restricted to properly prevent infilling activities. There are multiple stages in a waterlot infill and development where enforcement of specific uses is not occurring and not feasible to constantly monitor. • **8.9 GREEN ECONOMY (EP-43):** Consider elevating the "green economy" to a key action to deliver on within the Regional Plan. The transformational change required to address the climate emergency and achieve the goals set out in HalifACT will require the green economy to be a stronger focal of this regional plan review.	• **8.4.5.2 WATER LOTS (EP-22)**: Unequivocally restrict infilling activities within waterlots, and restrict any development on existing infills, except for "the purpose of marine related purposes, such as wharfs or marinas, or to provide public recreational areas or public access to the waterfront".

| Chapter 9: Celebrating Culture, Arts And Heritage

9.0 Introduction
9.1 Objectives
9.2 Sharing Our Stories
9.3 Protection of Heritage Resources
9.4 Development Abutting Registered Heritage Properties | • **Introduction**: EAC recognizes that the cultural and political structures and values that arrived with the colonizers are the root cause of the environmental crises we face today. Restoring Indigenous governance is crucial for righting the historical wrongs of land theft and for ensuring the survival and thriving of our human and ecological communities in the future. Returning to the wisdom of Mi'kmaw cultural and political values such as Netukulimk is vital to creating the just, vibrant, inclusive, and ecologically resilient world we dream about.
• **Objective 6**: Much of the area around Kjipuktuk is a "landscape of cultural significance" for Mi'kmaq, including the Bedford Barrens, Turtle Grove, the harbour itself, and likely others. HRM should work with Mi'kmaw historians, archeologists, and storytellers to surface and share more of these stories. (*this is partly addressed under* 9.3.6).
• Citadel Hill has cultural significance for Mi'kmaw and the African NS community, which should be shared – ANS and Mi'kmaw communities should be given the resources and support to surface and share these stories in their own way, at their own timeline, according to their own culture around storytelling.
• **9.2.1 MI'KMAQ AND INDIGENOUS RECONCILIATION (CH-2)**: Will these Friendship Accords flow down to Mi'kmaw rights holders to be able to access lands currently held by HRM for the purposes of gathering food and medicines?
• **9.2.1 MI'KMAQ AND INDIGENOUS RECONCILIATION (CH-3)**: Great to see celebration Mi'kmaw names!
• **9.3 PROTECTION OF HERITAGE RESOURCES**: We know that preserving older buildings and doing deep energy retrofits is often a better environmental choice than tearing them down. We support the preservation and upgrading of older buildings as a (usually) lower-carbon option.
• **9.3.4 HERITAGE AND SUSTAINABLE DEVELOPMENT (CH-24, 25, and 26)**: Great to see recognition of deconstruction and | • **9.2.1 MI'KMAQ AND INDIGENOUS RECONCILIATION (CH-4)**: Great to see HRM has an eye to demonstrable benefits for Mi'kmaw communities, and that Mi'kmaw representatives will be part of the process. However, need more details on *Community Benefit Agreements* to ensure that they are not being used to acquire trade-offs for harmful development/industrial projects.
• **9.2.2 AFRICAN NOVA SCOTIAN COMMUNITY PLANNING (CH-7)**: Need more details on what it means to restore historic ANS communities. |

	salvage, and energy efficiency retrofits. Much of the waste in the landfills comes from C&D materials. • **9.3.6 ARCHAEOLOGICAL RESOURCES**: As discussed above, there needs to be strong community collaboration regarding who contributes to and has access to archeological knowledge, how it's shared, and used.	

Chapter 10: Implementation
 	
	• **I-4** For minimum watercourse setbacks the more stringent shall apply – good! However, HRM still needs to define and use consistently setback or buffer and should have a universal definition (across the MPS, Community Plans, and by-laws), of what is and isn't allowed in a setback/buffer.
	• **I-9** Discretionary applications should also consider all of the consideration of I-8. Conservation Areas should also be considered in discretionary applications.
	• **Conservation Design Developments** – Good to have more detail on this. These developments only truly help with wildlife habitat conservation and habitat connectivity if they primarily avoid development at locations identified through data or modeling as important for biodiversity. So policy I-18 is good, but should include more data sources (e.g., High Ecological Value areas from the HGNP)
	• **I-18** We disagree with the reduction of parkland dedication to minimum 5% for Conservation Design Development. Conservation Design Development doesn't necessarily achieve any of the objects of HRM Parks though the private land that is designated to be left "untouched."
	• **I-20** We strongly disagree with allowing early tree removal, blasting, and earthworks by development agreement if this means ground clearing before background studies are completed.
	• **Parkland Dedication** – Yes, maintain a minimum of 10% parkland dedication for new subdivisions, but also figure out how redevelopment/densification subdivisions shall contribute to providing or improving local park access.
	• **Table 10.2 Park Classification System** – Should Nature Parks also be listed and defined here?
	• **I-45** should include other considerations for which lands to acquire for parkland dedication.
	• **I-54:** This is a great initiative, EAC supports the establishment of a Protected Water Supply Zone.
	• **10.3.4 SPECIAL PLANNING AREAS (I-20):** We <u>do not support</u> early tree removal, blasting, and earthworks under any
		• **I-7** Can this policy also include development agreements? As so much major residential development is done through development agreements, these regional objectives must be used to guide development negotiations.
		• **I-7 b)** Wording needs to change slightly to "the integrity of Regional Parks, National Parks, and provincial Wilderness Areas and Nature Reserves…"
		• **I-9** should refer to all of the consideration of I-8, plus Conservation Areas.
		• **I-18** should refer to additional data sources for planning development in CDD, including High Ecological Value areas from the HGNP, the 3 Corridors, National Parks, provincial Wilderness Areas, and Nature Reserves.
		• **I-44 b) iii)** This clause should be removed if it can be abused (e.g., multiple, 2-lot subdivisions side-by-side).
		• **I-45** should be expanded to include:
		    o g) the Essential Corridors, corridors of the HGNP, and corridors of the Wildlife Corridor Landscape Design Charette;
		    o h) High Ecological Value areas of the HGNP;
		    o i) federal National Parks, provincial Parks, Wilderness Areas, and Nature Reserves;
		    o j) conservation lands owned or managed by conservation organizations.
		• **10.4.4 PARKLAND DEDICATION (I-44):** We <u>do not support</u> any reduction in parkland dedication. Parkland dedication policy should be expanded to include development/ redevelopment on sites that increase density (not only in the case of subdividing land).

| | circumstance prior to all pre-development and land suitability studies being completed, and final approval of development agreements.
• **10.3.5.3 SITES SUPPORTING AFFORDABLE HOUSING INITIATIVES:** We do support the leadership and partnership exhibited related to sites for affordable housing initiatives
• **10.7 TRANSITION TO THIS PLAN (I-65)**: Business Plans and Budgets should begin to consider direction for future work of this Regional Plan now and in perpetuity. | |