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**RE: AMENDMENT REQUEST FOR THE COLE HARBOUR / WESTPHAL LAND USE BY-LAW
MOD ZONE, APPLICABLE TO THE AKOMA LANDS, WESTPHAL, NS (PID 40150567)**

Dear Eric and Meg,

On behalf of our client, Akoma Holdings Incorporated (Akoma), zzap Consulting Inc. (zzap) is pleased to submit this request for amendments to the Mixed Opportunity District (MOD) Zone within the Cole Harbour / Westphal Plan Area.

This letter clarifies and consolidates the requested amendments related to lot standards, building design requirements, and the development boundary. The proposed amendments are intended to better align the MOD Zone regulations with the community vision and to enable the orderly and effective development of the lands.

For reference and context, the following appendices are included:

Appendix 1: zzap Letter Dated November 1, 2024
Appendix 2: Drawing – Bare Land Condo Phase 1
Appendix 3: Site Servicing Schematic [October 15, 2025]
Appendix 4: Africentric Design Guidelines for the Akoma Developments

1.0 Community Vision

Akoma is committed to stewarding its lands in a manner that creates long-term economic, social, and cultural opportunities for the African Nova Scotian community and the broader public. The vision for the Akoma lands includes a complete, mixed-use community with cultural, commercial, recreational, educational, residential, and employment opportunities.

In support of this vision, Africentric Design Guidelines (ADG) were developed in 2022 through extensive research, collaboration, and community engagement. The ADG are grounded in the Nguzo Saba principles of Purpose, Faith, Creativity, Unity, Self-

Determination, Collective Work and Responsibility, and Cooperative Economics. These principles have long guided African Nova Scotian communities and provide a flexible but coherent framework for site planning, built form, and public realm design.

2.0 Background

Akoma was established in 2014 and has worked collaboratively with community members, consultants, and municipal staff to advance a comprehensive vision for its lands. Through Case 21875, portions of the site were redesignated and rezoned to facilitate development within Sub-Areas A, B, and C, recognizing their readiness for development and unique role within the plan area.

Lands outside of these sub-areas were addressed under Case 22257 and were intended to be reviewed through the Regional Plan review. As the Regional Plan was not adopted in 2025, the timing and feasibility of development on the remaining lands are now uncertain under the existing planning framework.

3.0 Enabling the Community Vision

The current MOD Zone regulations do not provide the flexibility required to implement the community vision as it continues to be refined. Large minimum lot sizes, frontage requirements, and prescriptive design controls reflect a more rural development pattern and stop the creation of a compact, walkable, and connected community.

The intent for the Akoma lands is to develop a complete community that is safe, family-oriented, and socially and economically vibrant. The existing regulations create unnecessary barriers that limit innovation, increase servicing costs, and constrain the application of ADG.

3.1 Parkland Dedication

The Halifax Regional Municipality Regional Subdivision By-law (RSBL) allows parkland dedication to be satisfied through the provision of land, cash, equivalent value, or a combination of these options based on site context and area-wide service provision standards (Section 82-84). The RSBL permits equivalent value to be accepted where sufficient parkland or recreation facilities are available and where land dedication would not optimally serve public recreation objectives at the neighbourhood or community scale.

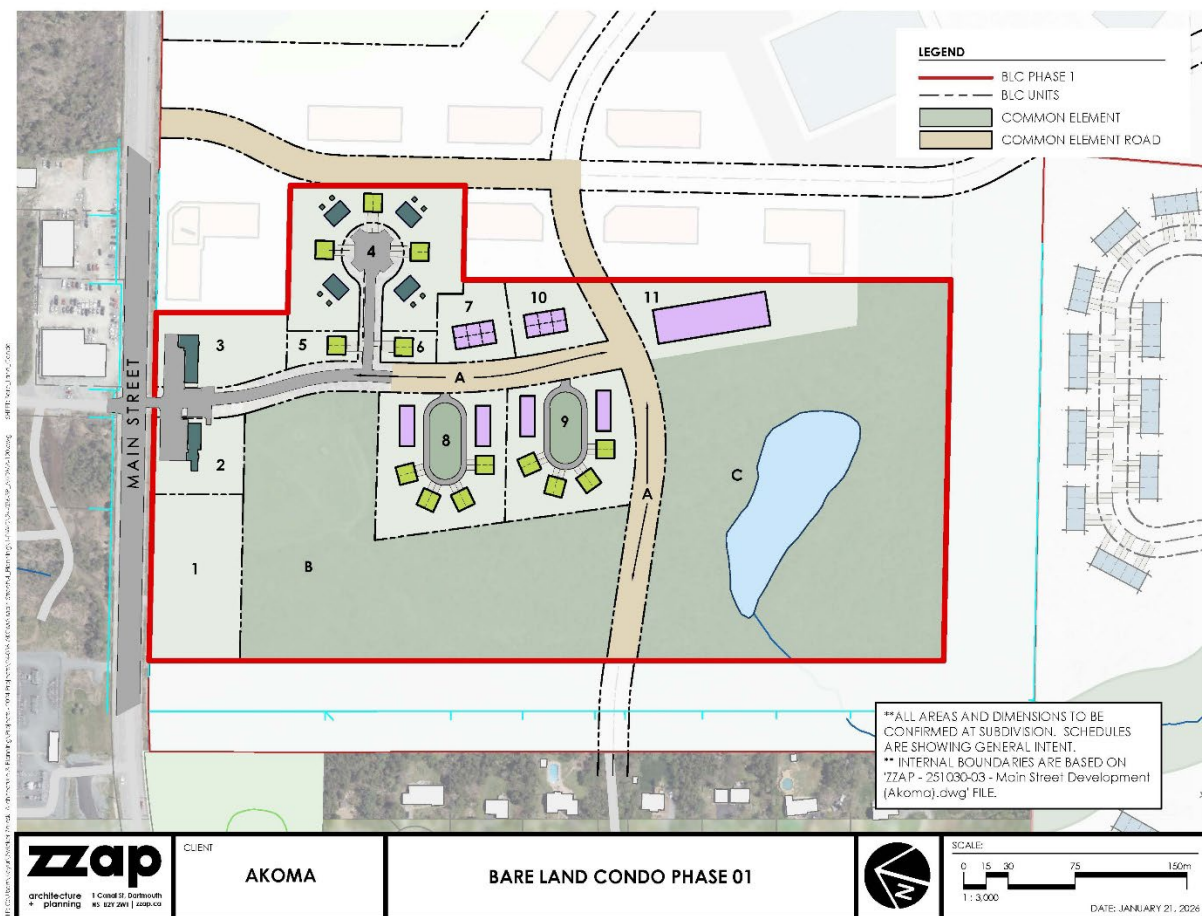
In the context of this development, the proposed development is in an area where existing and planned parkland infrastructure in the broader community adequately supports local demand, and where strategic investment in on-site amenities and parkland facilities will deliver greater value to residents. Providing work of equivalent value allows the municipality to further invest in community park facilities that serve the broader area; therefore, Akoma will retain ownership of the parkland and recreational amenities within the development area.

The proposed work of equivalent value approach is consistent with the policy intent of the RSBL, Cole Harbour/Westphal Municipal Planning Strategy and Land Use By-law, which recognize the evolving parkland needs of developing communities and support flexible mechanisms for satisfying parkland contributions where appropriate.

3.2 Lot Standards

The minimum lot area, minimum lot frontage and the yard requirements of the MOD Zone present a barrier for achieving a walkable, compact community form intended for the Akoma lands as shown in Figure 1. The application of large and historically rural requirements of lot area and lot frontage encourages expansive separation between properties and community members. This distance drives up the cost of septic servicing, increases private driveway length, and limits the ability for people to make strong community connection.

Figure 1: Bare Land Condo Phase 01



Section 15A.2.1 of the LUB requires that potential lots have the minimum lot area and minimum lot frontage required based on the type of building and number of units proposed. The Akoma lands may operate as a bare land condominium with multiple main buildings on one lot and should not have minimum lot standards applied.

3.3 Building Design

The MOD Zone contains prescriptive building design requirements that are unique within the Cole Harbour / Westphal Land Use By-law. These requirements significantly restrict architectural expression and conflict with the intent and flexibility of the ADG.

The ADG provide a comprehensive and culturally grounded framework for development and should guide building design in place of regulatory controls. Amendments are required to remove conflicting design standards and enable implementation of the community-led vision.

3.4 Development Boundary

Expansion of the existing development boundary is required to support a viable and complete community. Important components of the Akoma vision, including sports facilities, renewable energy initiatives, and cultural and community-serving uses, cannot proceed under the current designation and zoning. Development of these components cannot commence with the current designation and zoning applied to the property. These development opportunities are important and integral to the future of the AKOMA lands.

4.0 Request

The following amendments are requested:

- A. Remove Section 15A.2.1.
- B. Remove minimum lot frontage, minimum lot size and all yard requirements in the table under 15A.3.1.
- C. Change minimum separation distance between dwellings in the table in Section 15A.3.1 to a minimum of what is permitted under the National Building Code.
- D. Remove building design requirements from the MOD Zone, including:
 - o Building Design 15A.3.2(d), (e), and (f)
 - o Building Design 15A.3.3(d), (e), and (f)
 - o Building Design 15A.4.3(c), (d), and (e)
- E. Expand the development boundary as shown by the area outlined in purple in Figure 2 below.
 - o Apply the UR Designation and the MOD Zone to these lands.
- F. Update Schedule E of the LUB to show the new development area.

These amendments will better align the planning framework with the established community vision and provide the flexibility needed to advance development in a coordinated and culturally meaningful manner.

Figure 2: Expanded Development Area



5.0 Closing

We look forward to continuing to work collaboratively with HRM staff through the amendment process. Please do not hesitate to contact us should you require clarification or additional information.

Please let us know if you have any questions, comments, or points of clarification.

All the best,

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