

Appendix A: Compiled Comments on the Draft Regional Plan and Preliminary Staff Response

The table below compiles comments received from in-person and online engagement between June 20 and October 27, 2023, along with written submissions received during this time. Feedback has been organized and summarized to reflect common themes of discussion as well as individual comments. Many written submissions (which are included as a separate appendix to this report) included specific comments on policy language. These are noted under “Policy-Specific Comments.”

Chapter	Topic	Summary of Discussion and Comments	Preliminary staff response
General / Opening Pages	General Comments on the draft Plan	- Several positive comments: pleased with the overall direction of the plan, an overall comprehensive document, hope that policies can be implemented soon to start seeing improvements in communities. - Multiple comments regarding implementation language, too many ‘will’ or ‘may’ consider instead of ‘shall’. - Throughout the draft plan, the use of directive language is an issue – for example “shall consider.” Three provinces have shifted from the use of the word ‘shall’ to ‘must’ in drafting legislation. The word ‘shall’ is ambiguous and the word ‘consider’ is permissive rather than imperative. We urge a replacement of the phrase ‘shall consider’ with the phrase ‘must apply.’ throughout the Regional Plan. - Comment that policy needs to indicate the weighting of environmental concerns, community concerns, and development concerns - Consideration should be given to reworking the plan to address how Indigenous community goals will be identified, and if HRM will incorporate goals already previously identified by UNDRIP, TRC & Calls-to-Action, Inter-American Declaration on the Rights of Indigenous Peoples (“IADRIP”), etc. - Comment that “walkability” and “pedestrian first” should be included explicitly in any of the Plan’s main points? Future plans that ignore active transportation and opportunities for outdoor recreation including access to nature will not provide a complete community where one can live, work, play and learn. - Develop a Spatial Equity-based Index to safeguard the most vulnerable and underserved neighbourhoods so that they are prioritized in a systematic and organized way. - Use equitable development planning tools such as Social Impact Assessments and Health Equity Impact Assessments to ensure positive and negative health equity outcomes are considered (these are mechanisms to help implement HRM’s Social Policy Administrative Order). - Consider integrating hyperlinks to the plans/studies listed as sources and referenced throughout the plan. - Recommend removing the word “stakeholder” from all documents and replacing it with terms “community partners” or another term recommended by the Centers for Disease Control and Prevention (CDC) inclusive communication principles. “Stakeholder” is that in a colonial context, a stakeholder was the person who drove a stake into the land to demarcate the land they were occupying/stealing from Indigenous territories.	Staff will review wording throughout the document to improve readability, strengthening policy language, and provide a consistent voice throughout the document. Reference to the Accessibility Strategy approved by Regional Council in May 2021 will be strengthened in the updated Draft.

		- Be innovative and open to small experiments. Try it for one area or another, for limited time, and/or within a budget amount, etc, to see how it works. Then learn and apply appropriate follow-up actions. - This plan does not deal with 21st century problems in HRM, HRM needs less government and bureaucracy. Too many levels of management at HRM is preventing effective decision-making and development progress. - The scope and ambition of the Regional Plan Review is impressive. There are many excellent aspects, and the focus on environmental protection during this period of high growth is commendable. - Consider using public benefit money for improved accessibility. - Disability is only cited once in the document. Need a much stronger commitment to accessibility in a land use document.	
	Preface and Land Acknowledgement	- Add a statement about the environment to the Preface. To establish the overarching commitment to environment sustainability within the Plan, make a clear statement to that effect on page 2 following the statement on Land Acknowledgement - Pleased to see acknowledgement of ancestral lands of the Mi'kmaw and Black Nova Scotians, and commitment to reconciliation and partnership going forward. - Consider using "ancestral and unceded" lands. - Mentioning Etuaptmumk (Two-Eyed Seeing) could be viewed as tokenism unless it is truly pursued and implemented. 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. - Land Acknowledgement - Embracing Etuaptmumk must be evident in policy and implementation throughout the plan. Stewardship of and respect for the natural environment that sustains us as the foundation of all growth and development decisions will signal whether or not the municipality is ready to embrace Etuaptmumk.	Staff will review land acknowledgment statements.
Chapter 1: Introduction	Historical Settlements	- Section 1.1.1 does not acknowledge the encroachment and occupation of Indigenous territory by colonists, and that the English did not fulfill their parts of the Peace and Friendship Treaties - 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. Recommend including a section on the natural history of HRM. - Recommend including more detail to ensure a more robust understanding of the contributions and stories of how African Nova Scotians landed in Nova Scotia is documented. - Re: page 8 description of Regional Centre - The Regional Centre urban neighbourhoods emerged out of the colonial garrison settlement, expanding from there. Hundreds of years would be more accurate.	Staff will review comments as part of revisions to the Plan.
	Regional Vision and Principles	- Recommend adding The Social Policy Framework to Chapter 1 as an important guiding framework to achieve the overall goal and vision for HRM.	Staff will review comments as part of revisions to the Plan.

		- The Plan does not address issues of Anti-Indigenous racism, consideration must be given to addressing the Indigenous Territorial Rights, & Human Rights that stem from the territory of Mi'ma'ki being unceded territory. - Include the word "safe" in vision statement. - Principles focus heavily on housing, giving the impression we will have healthy communities when we have housing & employment growth. Recommend rewriting the principles to support all sectors. - Add transit to "housing and employment growth." - Replace "encourage" with "ensure." - Principles, add: Shall, as a critical component of environmental management, restore degraded aquatic and terrestrial habitats. - 'Encourage' is a weak word for a principle and the environment is the foundation upon which the municipality is built. Environment needs to stand out in the principles. - The 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") is good, however, the rest of the document doesn't link to quality of life well. Recommendation to expand on quality of life/well-being as justification for building healthy, well serviced, and connected communities. - The inclusion of "sustainable environment" in the Municipality's vision is a positive and welcome statement on Municipal priorities for the Regional Plan.	
	Relationship to other plans	- Consider including other higher level provincial plans which would impact how HRM does planning, such as the Nova Scotia Act to Eliminate Racism and Hate. - It's unclear whether the Regional Plan directs the Priority Plans or the other way around. - It is unclear whether this is a strategy or plan; development of a strategy comes first before establishing a plan around the strategy. The purpose of the document is confusing. - The priority plans are weakened by their use of 'may' and 'may consider' instead of 'shall.' - Consider adding a section on a Municipal Childrens Charter. - Link to other plans in this section so easy to find, and add Social Policy Framework and Women and Gender Equity Strategy. - Community Planning framework - long overdue. Looking forward to a clear timetable for this much needed modernization of our local plans. - There are repeated references within the Regional Plan to needing to create other smaller plans. There is no time frame outlined for when these sub-plans will be created, which is worrisome as there is no accountability to ensure that they are done in a timely way. If the main Plan is relying on other plans, the steps for creating these, including a timeline should be clearly outlined.	Staff will review comments as part of revisions to the Plan. The relationship to other plans will be clarified. Given the Municipality's comprehensive and ongoing work across many business units, this section may be adjusted to discuss the types and range of plans and strategies used, rather than identifying the specific documents.

	Provincial Role in Planning (Interest Statements)	- Would like to see different and updated Provincial Interest Statements to reflect more issues, such as environmental issues. - Flood Risk statement - Should also address projected sea level rise and the position of the high tide flood line in 2030 and 2055 -- the end of this plan and the next one. Should also acknowledge the provincial flood line mapping for both river and coastal flooding. - Agricultural Land statement - HRM needs agricultural land zoning, zoning that prioritizes and protects agricultural land uses for quality agricultural land. - Need for HRM to collaborate with the Province on rental and housing issues, maintaining wilderness areas, parks/open space. - The new provincial housing task force is only temporary, but the Regional Plan refers to it. How does a temporary agency become permanent? - This section may need to address Bill 329 by the provincial government. At the very least, if it comes into effect, there should be an explanation of what that shift of control means and its implication for implementation of this RMPS. What does it mean for public participation, the environment; is the province deciding how HRM grows?	Staff will review comments as part of revisions to the Plan. The Regional Plan and all other municipal planning documents must be aligned with the requirements of the <i>HRM Charter</i> . The current Statements of Provincial Interest are limited in scope, however, the Municipality may adopt more stringent requirements where permitted by the Charter.
	Interpretation	- Adopt the use of "shall demonstrate consideration of" so that the public can better understand how and why decisions are made, especially around conflicting land uses. - There are many instances (highlighted in my comments throughout) where "shall consider" appears not to fit with what should be a mandatory action. - Is "shall give consideration to" the same as "shall consider"? Need consistency in terminology so that the policy intent is transparent.	Staff will review comments as part of revisions to the Plan and consider opportunities to strengthen policy language.
Chapter 2: Planning for our Region	General Comments / About this Plan / Role of the Regional Plan	- Develop set processes (possibly an administrative order) for how Priority Plans are considered in planning and development decisions, so they are utilized in a comprehensive and consistent manner. - Add Indigenous Caretakers to list of cooperation partners. - Opportunity to add two-eyed seeing approach. - The change to directing growth to the Urban area will require education/engagement to bring current residents along and address any discomfort with the change. - Add health and well-being as trends to monitor as well as demographics. - We should use medical centres as growth centres or work with the province to create new medical centres at proposed growth centres. Patients and practitioners cannot get to or from existing medical centres without a car and when they do there is no parking because everyone is driving.	Staff will review comments as part of revisions to the Plan's description of the role of the Regional Plan. Staff are considering whether to combine Chapters 1 and 2 as both are introductory in nature.
	Community Planning	- Looking for better maps of the proposed boundary areas so residents can clearly see which plan their community/property will be in. - Need to provide more explanation on why the boundary between urban and rural was chosen, also more explanation on how 'urban' means regional centre and suburbs.	Staff will review comments as part of revisions to the Plan, including updates to clarify mapping and terminology.

		- 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. - Support for accelerating the Community Plan & By-law Simplification Program; it is essential to modernize planning policy with good science and implement HRM's priority plans. - When planning for suburban densification in a way that supports the implementation of our priority plans (GNP, IMP, and HalifACT), look at the cities of Brampton, Markham, Richmond Hill, and Vaughan's use of a 'Sustainability Metrics Program' in their discretionary planning. This "sustainability scorecard" is a clear tool for developers to use to incorporate sustainability principles into their development applications. I could see something like this being implemented at HRM.	Staff intend to prioritize work on the Suburban Plan, ensuring it is in line with the policies of the draft Regional Plan, Priority Plans, and initial feedback received. Regarding draft Policy RP-10: "Underutilized" refers to vacant or brownfield lots with the existing urbanized area, rather than greenfield lots. This will be clarified. Staff are reviewing other municipalities' sustainable design tools (such as the Sustainability Metrics Program) and how the goals and structure of such a program could apply within HRM's planning framework.
	Population Scenarios	- Provide more information on where the 1 million projection comes from. - Some thought we should not aim for 1 million people. - Would like there to be visioning scenarios about how much population we want, an 'ideal size' for Halifax, instead of acting like growth is inevitable and we can only accommodate it. - Concerns that the rapid population growth will damage the characters of HRM's different communities. - There is an environmental limit to how much growth HRM can accommodate, this plan should establish a process to determine what that limit is.	The Municipality is limited in its ability to control population growth. Population scenarios in the Draft Plan respond to modelled projections based on recent historical trends and provincial goals for growth. Population growth is influenced by economic factors, as well as immigration (controlled by the Federal government) and interprovincial migration rates. The 2006 and 2014 Regional Plans projected a population to 2031, and HRM has already surpassed the 2014 Plan's 2031 population projection in 2023. This Draft Plan instead uses a population horizon (rather than year) and an approach to responsively plan for growth as it happens, knowing that a continued high level of growth, at the rates seen in recent years, would result in a population of 1 million people in approximately the 2050s.
	Intensification / Infill	<i>Refer also to Housing (Chapter 5) comments</i> - Comments supporting infill development in and near downtown - Several comments supportive of increased density to support more housing. - Comments supporting infill across HRM, do not continue to expand outwards (urban sprawl) - Allowing more infill development and 'gentle density' is probably the single biggest thing the municipality could do to manage the housing crisis.	The Regional Plan and Community Planning Programs will continue to support strategic growth and increased housing opportunities.

		- With community and partner input, develop targets pertaining to the proportion of infill vs. greenfield development. How do we infill without gentrification (i.e. replacing older developments that are less expensive with new ones that will be more expensive)	
	Growth targets	- Many attendees and respondents were frustrated with the impacts of population growth. Others were encouraged by the growth, noting the need for more immigration with consideration for an aging demographic. - HRM is experiencing similar issues as Ottawa in the 1990s, HRM should look to their example to see what worked and what didn't. - Confusion about the difference between the Urban Area and Urban Service Area Boundary, and what is shown on Map 3 - Many comments supporting idea of directing both residential and employment growth into the urban area and prevent more urban sprawl. - Support for the division of rural, suburban, and rural HRM into different planning areas to address unique characteristics of each area. - Would like to see 100% of growth targeted to urban area to reduce sprawl. - Ensure serviced land supply for new housing, have more than a 5-year supply. - Growth should be multi-nodal. - We have too many growth centres. - Cheaper to keep septic fields in service rather than expand centralized services. - Use the Halifax Green Network Plan (HGNP) to shape where new development is located and for focusing growth in already serviced areas. The HGNP needs to lead our development and growth decisions rather than simply be "considered". Consider policy that the HGNP shall be used as an overlay zone to guide development decisions. - Please look closely at studies around the economic side of greenfield vs brownfield development as well as redevelopment and urban infill. See the Brownfields report. Especially in a valuable ecological location such as Sandy Lake-Sackville River, building housing makes no sense. - Identifying areas for thoughtful redevelopment and intensification in the regional centre and suburbs is the best way to grow sustainably. - Would have liked scenario planning to have happened as part of the growth targets. - HRM should direct more growth to the rural areas, 10% is not enough to support more economic growth in these areas. 'Urban sprawl' makes houses cheaper/more affordable, and have less traffic and less crime. - Suburban areas make housing cheaper/affordable. By concentrating 90% of new housing units in the Urban core, traffic to the centre is unrealistic; traffic to the centre is already in crisis. - Should HRM wish to establish population targets, they should be based on careful analysis of environmental, social, and economic factors relative to the Municipality's needs and aspirations.	Focusing most new housing and employment growth in the Urban Area allows the municipality to make the most of existing services. A Strategic Growth and Infrastructure Priority Plan will support the Municipality to plan for increased infrastructure and services where growth is expected. Where needed, clarifications will be provided to Map 3 and references to the Urban Area.

	Infrastructure Planning / Strategic Growth & Infrastructure Priority Plan	- A theme of discussion was the need for improved infrastructure - do not invite the growth unless HRM is ready to provide the infrastructure and expand where there is capacity. - There is an infrastructure deficit in HRM where improvements are needed / have been needed but have not come in conjunction with the population growth. There are concerns that more growth will further stress the infrastructure and services unless improvements are made. - Comments included support for growth and increased density in the Regional Centre and Suburban areas provided that the additional infrastructure and services such as transit, sewer, emergency services, are built as well. - Comments including support for the Strategic Growth & Infrastructure Priority Plan and the water/wastewater boundary as a way to control density. - Did past studies of municipal water & wastewater consider that fresh water is a limiting resource for population density? - HRM should consider science-based knowledge of the limits to growth. - On-site services are good for low-densities. - Make sure to consider flooding and water levels when identifying areas for more growth, e.g. Frasers Lake, Sackville River - Consider that not all rural areas have access to enough groundwater for additional wells. - Consider the issues with trees and powerlines (outages) when looking at future growth - trees and powerlines are issues when combined. Cut the tree branches more, or underground wires. - Consider using a spatial equity index, Health Equity Index, and Social Impact Assessment to ensure historically underrepresented communities receive equitable access going forward. - Recommend the Strategic Growth and Infrastructure Priority Plan reflect all existing Priority Plans, especially the Integrated Mobility Plan and Halifax Green Network Plan, to guide this decision making. - A comment from the development industry that the Strategic Growth & Infrastructure Priority Plan will be a welcome addition to the knowledge base in our community, but until it is complete we will benefit from other options for action (for minor changes) and that there should be an ability for a landowner to introduce opportunities for extension to the service boundary. Suggestion is for an amendment to RP-25 allowing for an amendment to the boundary of the Urban Settlement designation when "the proposed amendment and extension represent a minor adjustment to service and the proposed amendment provides for efficient street & service connections." This amendment gives opportunity to the municipality to work with landowners in the interim where it is advantageous to do so. The preference is to work in partnership to find solutions rather than being completely reliant on Municipal efforts and resources towards completing the Priority Plan.	As part of Phase 5, staff will undertake the development of the Strategic Growth and Infrastructure Priority Plan, which will include a focus on infrastructure funding, community facilities, parkland acquisition, and transportation investment. The Mobility Chapter will be revised to reflect the intent to determine mobility infrastructure needs as part the Strategic Growth and Infrastructure Priority Plan.
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	Infrastructure Charges	- Multiple comments expressing sentiment that growth should pay for growth and that costs that should be the responsibility of developers, not taxpayers. Comments expressed concern about HRM not collecting enough fees to maintain infrastructure, and what the financial impact would be on existing residents in areas receiving municipal services. - HRM has significantly low development and construction fees compared to other cities across Canada. - Ensure you collect enough from development to build and maintain the infrastructure – West Bedford has failed to do this and now they are paying the consequences with flooding and not having adequate open spaces, paramedic, fire services. - By-laws need to be created to ensure that developers are responsible for the cost and advance creation of the appropriate infrastructure to support their development. I saw that this was mentioned as a consideration in the Regional Plan; however, this should be a firm part of the Plan moving forward. This is certainly a standard approach in other areas such as Ontario. The cost of servicing these new developments should not be downloaded to existing taxpayers. This has potential to be a significant source of revenue for the Municipality given the growth projections contained in the Plan and is one that should be guaranteed in legislation. - Concerns that expanding the service boundary will lead some residents to be unable to afford their homes due to charges, we do not want to pay for a developer’s pipe extension	Funding options for infrastructure will be a key component of work related to the Strategic Growth and Infrastructure Priority Plan. Planning & Development staff will work closely with Finance and Asset Management and other Business Units to determine the funding, timing, prioritization, and sustainability of infrastructure investments needed to accommodate the existing population as well as the needs of growth. Staff will consider all options to invest in infrastructure, including through other orders of government.
	Regional Plan Designations	- Consider removing activities not related to food production from the Agricultural Designation. The Agricultural Designation should protect what is left of agriculture-appropriate lands in HRM for sustainable agriculture practice and guard against competition with resource extraction. - Wonderful that RP-21 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. It is good that the draft Regional Plan recognizes 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.	Staff will review comments as part of revisions to the Plan’s description of the role of the Regional Plan. Agricultural and other rural zoning will be further considered as part of the Rural Community Planning program. As part of Phase 5, future growth areas will be considered and appropriate designations and zoning (including the Urban Reserve areas) will be considered at that time.

		- Suggestion to delete the “urban reserve” designation once the Strategic Growth and Infrastructure Priority Plan is completed, and simply zone for development where it works. The urban reserve designation leads to land speculation and uncertainty for communities. - The rural designation seems to be focused on “preserving character” when the most important theme in rural areas over the last 40 years and the next ten to twenty years is economic viability. - Add to explanation of the Open Space designation that “protected and sensitive open space lands... contribute to sustaining vital ecosystem services.” - Support policy RP-21 for The Open Space and Natural Resource Designation to identify the green network as it relates to both public and private land. Use the HGPN as an overlay zone when making development decisions. - Request from Village on Main to create a new designation in the Regional Plan, a ‘gateway’ designation (see <i>Suburban Community Planning Comments</i>)	
	Policy-Specific Comments	- Would like section 2.1 acknowledgement align with the Provincial office of equity and anti-racism acknowledgement. - 2.3 – can a source be provided for the past wastewater studies? - 2.3 – would like language to be ‘shall’ instead of ‘may be’ in considering shifts to the thinking underpinning the plan - 2.3 and 2.4 – it is unclear how these sections are different. - Specific wording suggestions for RP-1, RP-10, RP-18, RP-28 a) - Proposed alternate phrasing of RP-3 - 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. Define underutilized land and clarify that it does not mean undeveloped. - RP-10 add “while respecting and prioritizing environmental issues and concerns.” The Bedford Land Use Bylaw currently contains a bylaw which has preserved the Sandy Lake area and its valuable ecosystems for many years. For a building to be approved, the lot size must be 5-acre minimum and the property has to have been on a serviced road on or before October 9, 1991. If the entire area is rezoned back to its earlier park designation as we request, and the area is therefore protected under the park umbrella, this “five-acre by-law” may become unnecessary. Until the area is fully protected, we request that it remain in place. - RP-14 Ecology Action Centre comments on the definition and mapping of the Urban Area - Strengthening policy RP-15 to read “establish” rather than “consider establishing” by-laws to allow for the recovery of growth-related costs. - Support policy RP-16 to allow infrastructure charges to recover capital costs.	Staff will review policy-specific comments provided when refining the Draft Regional Plan.

		- RP-5 - Consider rewording RP-5 to state "...to address historic *and persisting* inequities and injustices...". - 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? - Specific wording changes suggested by Ecology Action Centre for RP-14, 2.6, 2.71, RP-21, definitions of Rural Resource and Agricultural designations. - RP-2 – add transit as well as water & wastewater infrastructure. - RP-4 add the word "safe" to tie into public safety strategy. - Section 2.3 - Some lakes and ponds are currently under stress from not providing protection and conserving ecosystem health. Why is protection of these waterbodies not considered.	
Chapter 3: Healthy and Complete Communities	General Comments and Objectives	- Complete communities Objective #1 can be strengthened by replacing "lens" with "principles." - Following through on Objective #2 in design guidelines, development agreement conditions, and Municipal Design Guidelines/Red Book - Have a tangible definition of "complete communities" – BC Complete Communities Guide as example. - Add health and well-being to list of outcomes. - Add child-friendly cities as a core concept. - Multiple vibrant downtown areas should be developed in Urban Settlement areas, possibly even Urban Reserve areas where critical mass can exist. More people can then work in multiple central locations while living near them, rather than commute. - There are a lot of entities that don't have to be located in the Regional Centre. Encourage that perspective for entities looking for locations to question whether it has to be located in the Regional Centre. Putting entities in new and/or rapidly growing sectors is ideal for these new potential downtown areas. - In years gone by we had many small communities which were more self-sustainable with local shops and amenities without the need to drive to large industrial parks like Bayers Lake or Burnside which are car oriented vs. pedestrians. - Complete communities are a lovely goal, but unlikely to occur in HRM or they would already exist. Significant changes would have to be made to our culture in order to see this come to fruition. This is unlikely to happen in the near future and so, the Regional Plan should not rely on this as a predominant strategy going forward. - Consider adding language related to health benefits and being explicit about what is meant by 'short journey'. having a specific distance would provide a tangible target which would lead to more effective monitoring. - Recommend using the Healthy Built Environment Linkages Toolkit above as a guiding framework to create a priority plan for creating healthy communities.	Staff will review comments as part of revisions to the Plan.

	Regional Centre Plan and Growth Areas	<i>Several comments in this section are closely related to the 'Height' and Chapter 5 Housing sections, read those sections for further context and detail.</i> - Comments include support for principles of Regional Centre plan – Complete communities, pedestrian focused developments - Should state access to nature as a Core Concept. The aspects of the Centre Plan quoted here don't emphasize enough access to <i>nature</i> (not just parks), and the value of having intact ecosystems to provide ecosystem services in the Urban Area. - Comments include support for mid-rise mixed land use for Dartmouth Cove - Centre Plan needs more growth and density than what is suggested in the Regional Plan - Have defined timelines for periodic review. - Wants the Northwest Arm view protected. - Would like to see more 3-bedroom apartments. - ER zones need to be way more permissive to accommodate the growth we're seeing. - Lack of tree canopy in North End, support for public landscaping greenery like planters, North End doesn't feel as connected via bike to the rest of the city, need for HRM to champion placemaking. Street closing fees are prohibitive for smaller groups and non-profits. - Any changes to the designation of land in these plans should consider more than just housing and population projections when being changed -- including transit, traffic, open space and park, natural assets, and wildlife corridors. - Recommendations from the Heritage Trust of Nova Scotia to strengthen protection of heritage buildings in the Regional Centre	It is noted that the Vision and Core Concepts in this chapter are already adopted as part of the Regional Centre Secondary Municipal Planning Strategy (Centre Plan). These comments will be supplied to Staff in the Centre Plan team.
	Suburban Community Planning - General Comments	- There needs to be some clarity on what/where is considered the suburbs. - Make progress on the Suburban Plan as soon as possible, and ensure it is in line with the policies of the draft Regional Plan and our Priority Plans. - Comments included support for guiding principles of the Suburban Plan, particularly the idea of more complete communities. - Pleased to see Centre Plan guiding principles echoed in the draft Regional Plan and upcoming Suburban Plan - they are centered around complete communities, transit supportive growth, and pedestrian first and human based design. - Use a Public Health framework to guide the Suburban planning process (see Public Health's submission to Themes & Directions). The process should also reference UN sustainable Development Goals. - Use the Women's Safety Assessments as practiced by HRM's Public Safety Office, to identify urban design features to promote and barriers to remove. - Several of the proposed 'hows' to achieve 'successful criterion implementation' of the Suburban Design Guidelines have been turned down previously by various HRM departments. The criteria are also detailed design matters usually done after a typical	These comments will be brought forward to inform the Suburban Community Planning Program. Through the Community Planning Program and as part of the Phase 5 of the Regional Plan Review, staff will continue to study how development on the "edge" of the Urban and Rural Areas should be managed. Terminology will be clarified in the revised Plan.

		planning process. Developers would need to front end load their detailed design to meet these requirements, driving up development and holding costs. - Suburban Design Guidelines aim to preserve the natural environment. However, HRM Engineering often requires developers to do a lot of blasting to minimize road grades and mitigate mobility challenges. These are conflicting policy outcomes. - Concern about maintaining access to the path along shoreline of the NWA on Halifax Mainland side. - Need to be clear that adding water and sewer connections to an area will bring about densification. - HGNP should be named specifically as a consideration when selecting or changing Suburban Plan Growth Areas (like it is referenced in the Rural Community Planning section). - 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. - Add a 5th pillar, "<u>Education and Community Engagement</u>" that relates to ensuring post-development protection of the environment, with on-going monitoring, strong regulations, community engagement, and a commitment to long-term sustainability. This is a shared responsibility among governments, developers, communities, and individuals to protect and preserve the environment for future generations. Include the following principles: Educate local communities and stakeholders about the importance of post-development environmental protection (i.e., retain buffers in place on properties abutting watercourses); Legal Frameworks and Enforcement (strengthen environmental by-laws, and enforce penalties for non-compliance with environmental protection measures.) - Regional Plan must provide direction to the Suburban Plan to achieve density independent of the success or plans for the Rapid Transit Strategy and BRT because upzoning and increased density is needed whether the BRT is implemented now or down the road. - The Plan needs a clearer vision and focus on Dartmouth, specifically Dartmouth East	
	Suburban Community Planning – Guiding Principles	COMPLETE COMMUNITIES - There were a high volume of comments supporting complete communities with mixed land use – <i>see also the mixed-use section summary for Chapter 8.</i> - Comments included support for complete communities as a major improvement to HRM - walkable, mixed-use areas in suburban places, not just the downtown core - To encourage more pedestrian travel the issue is not enough sidewalks, but that the city is sprawled out and there is nothing in walking distance. The solution is new zoning that allows multi-family housing, grocers, bakeries, restaurants/pubs, delis, barbers, all within the same block.	These comments have been summarized in the What We Heard Report and will be brought forward to inform the Suburban Community Planning Program.

		- Want to downscale from large family home since children are grown and moved out, but there is nowhere in our neighbourhood that we can afford that meets our needs. Give people options for housing near services like recreation, walkable distance to a grocery store. - These communities are huge and need to have services like corner stores, etc. so that residents don't have to drive to the grocery store to get milk or a loaf of bread. A community gathering building might help to solidify the area as a community. - Love concept of high density, complete communities, prioritizing walking, cycling, transit - make sure each neighbourhood has a variety of housing options, services, public spaces and public parks. - Strongly feel that HRM needs to adopt a multi-nodal approach to development, not the antiquated idea that there is one downtown, which everyone should work in and commute to. The complete communities lens is the correct one to use when designing new neighbourhoods/communities or for the redevelopment of older ones. However, for "complete communities" to truly work, they will need acceptable density levels to function adequately. A strong multicentric approach will enable real Transit Oriented Developments, facilitating the development of a strong transit system, which is the real backbone of sustainable cities. - Encourage local "downtowns" so that shops, services are in each community centre. - Change "positive health outcomes" to "positive health and wellbeing outcomes." - We need to make sure that shared services and amenities are developed in the middle of mixed income communities. - Support for mixed use housing and increased density, especially around places like Dartmouth Crossing and Bayers Lake OPEN SPACE AND CULTURE - Many comments on the need to include lots of green space and trails in conjunction with new development. - Incorporate an environmental lens that considers access to nature, recreational space, active transportation, and green space when planning for complete communities. - Need to provide and improve affordable and accessible housing, education, healthcare, transportation, while protecting environment. - More pathways between communities and streets for better connectivity - Excellent that "preserving, rehabilitating and restoring natural system functions" will be a planning principle. 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 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.	
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		TRANSIT SUPPORTIVE GROWTH <i>Many comments about transit are also related to the Bus Rapid Transit and Transit sections, read those sections in this document for further context and detail.</i> - Interest in growth, support for intensification within the service boundary. There is a strong need for more housing in the suburban area, family-sized units, increasing height in residential neighbourhoods to 6 stories and eliminating single unit dwelling neighbourhoods. - Suburban greenfield developments are not walkable, non-car transit modes should be a priority for suburban plan. - The Moving Forward Together Plan's Corridor routes have seen a nearly 30% increase in ridership from pre-pandemic levels. They connect key destinations and are already efficient routes. The focus of densification should include these routes and respect the riders who use them today as we build toward a future with the prospective BRT system. Recommend amending policy HC-5 to direct intensification of land use to current high ridership Corridor routes as well as future BRT system routes shown on Map 3 (and to update Map 3 to also include today's Corridor Routes). PEDESTRIAN FIRST AND HUMAN BASED DESIGN - More dense, human-oriented development will help the city become more financially solvent - Create a city that is built with the pedestrian in mind. - Would like the current wind impact assessment to be evaluated, to determine if the policy/regulation intention has been achieved and if adjustments are needed. - This is commendable from a public health perspective. OTHER - Would like to see images in the Suburban Design Guidelines include images from the existing suburban areas. - Would like design guidelines to promote more colourful buildings – do not like all the grey and black. - Wondering why the vision for the suburban plan has not been defined in the RP draft. - Some suburban areas have seen increased growth but the infrastructure has not kept up - Traffic is an issue, particularly at 'pinch points' like the Armdale Roundabout - Prioritize second/emergency egress exits in suburban areas. - Access to schools should be used as a focal point of development. - "Community Walks" to connect with local residents were used in the Centre Plan process – do this with Suburban Plan also.	
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		- Proposed Transit Walksheds in Suburban Growth Areas should be more aspirational and include areas like Sackville, Bedford & Eastern Passage. These would not be contiguous with the existing walkshed boundary but rather branches/nodes extending from the polygon depicted on Map 3. - Would like height for accessory buildings increased to allow for construction of loft-style backyard suites above existing garages	
	Suburban Community Planning – Community Specific Comments	<i>Many comments about suburban communities also related to Mobility, read that section for further context and detail.</i> SACKVILLE - Mixed opinions on growth in Sackville. Some residents did not want any building greater than 6 stories to be built, while others welcomed the growth and increased density in the area. - Interest in more housing options being beneficial to seniors wishing to downsize but stay in the area. - Interest in increased sidewalks, streetscaping projects, and recreation infrastructure in Sackville, supporting the existing parks and trails. - Interest in more mixed-use ground floor commercial stores with condos on top along Sackville Drive - Would like to see increased density along Sackville Drive (7-9 stories) with an emphasis on requiring ground floor commercial. - Want to identify and protect the existing green space along Sackville Drive before upzoning it for greater development. - Current zoning in Sackville is very restrictive, excited to see more opportunities for development. - Infrastructure improvements like sidewalks are welcome. - We need to change our mindset about how communities are built and designed. Communities in Sackville should be more mixed use and denser, similar to how European towns and cities build. Should be able to access all the things we need without driving out of our community. - Margeson Drive Area keeps getting left out. It could have 2000 units, shopping area, and a theater which would make it the centre of Middle Sackville. - Some community groups in Sackville would like more funding, staff support, and would like some information events with local community groups to express concerns in their community and learn about how to get involved. FAIRVIEW - Concern about lack of heritage preservation happening in Fairview.	These comments will be brought forward to inform the Suburban Community Planning Program.

		- The City needs to ensure that comprehensive planning for Park West lands prohibits high-rise buildings being close to or abutting low-rise, established residential uses / properties. BEDFORD - There needs to be a better understanding of growth in Bedford in relation to community character. - Comprehensive Development Planning for the waterside of Bedford Highway between Torrington Drive and Melody Drive. - When was the last traffic Study prepared for Bedford Highway? - When planning in Bedford, be deliberate about what changes and what stays the same – the focus for densification should be on opportunity sites, include Sunnyside Mall, Bedford Place Mall and Bedford Highway (with floor mitigation improvements included in development plans) - Some comments of concern re: Fort Sackville School Property - Case 22267. Will this site be high-rise? - Old Bedford/Dartmouth Rd/Wardour should not see a lot of change – road network is full and do not want more traffic. - Future Density in the vicinity of Wardour Street and Dartmouth Road Should be limited to low-density. - There should be no increase in density around Mill Cove. - Support for towers at Mill Cove - Dartmouth Road is stressed, and until the Highway 107 extension is built, there should be no development on Dartmouth Road. - Sunnyside Mall should not be a growth centre. - Lands around Beaver Bank Rd should be considered comprehensively for future development. - Should invest in community hubs instead of directing all transportation/ development into downtown. - The DND munitions facility on Magazine Hill is a hazard, and it makes the Bedford neighbourhoods adjacent to it inappropriate for additional development. - If the land around Paper Mill Lake is going to be developed they should be required to create trails and AT infrastructure that connects Hammons Plains Road to Larry Uteck as well as a 102 overpass to connect to Bedford West. SPRYFIELD - Positive direction by taking a watershed approach to land planning and management (“Understanding how natural processes occur within watersheds can provide a robust framework for planning and land use decisions.” Purcell’s Cove Backlands have two	
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		major, separate watersheds and several smaller ones, with large portions of these watersheds lie outside of the Backlands and experiencing significant development pressures, which need to be managed so it doesn't impact the watersheds. - Support for 'complete communities' approach and watershed planning approach. Adding people to the McIntosh Run Watershed should be achieved through redevelopment and selectively adding density and moderate density new developments near existing transit-serviced arterial roads, not sprawl. Include shopping and services that are close to home; and invest in transit, walking and cycling. This means that private cars can be used but are optional for a practical high-quality life. Low-density car-focused urban sprawl consumes natural landscapes and impacts waterways, especially in the McIntosh watershed where most new development require bedrock blasting. HRM's proposal for rapid transit in the Herring Cove Rd corridor through Spryfield can't come soon enough. Herring Cove Rd and linked arterials need better, connected and continuous sidewalks and bikeways. There is a critical need for fair access to housing. Make planning decisions that prioritize the least fortunate Haligonians, future Haligonians, and the wildlands and river, over the demands of the more affluent residents/neighbourhoods. - Support for density. Not just sprawl, single houses, duplexes, but a primary focus on building up apartments and condos in already developed areas as the primary focus. VILLAGE ON MAIN - Village on Main (VOM) is the Business Improvement District for the Main Street area in Dartmouth. There is development interest in this busy and growing area, which features a mix of residential, commercial, office and amenity uses. VOM provided a series of requests, including: - Establish a new "Gateway" designation in the Regional Plan to reflect the unique character of their area. - Work in partnership with BIDs to support work and engagement for expedited growth. - Develop a Closer working relationship between BIDs and Halifax Transit and Active Transportation - Improve transportation connections between hubs (especially employment hubs and projected growth areas in Dartmouth) - Increase level of transit service in Dartmouth - Update regulations and permitted density to incentivize development and good urban design as the area has seen limited change. - VOM also submitted a series of area specific policy and LUB amendments that they recommended to address issues and concerns they have identified in working with property owners to support new development in the area.	
	Future Serviced Communities <i>Port Wallace, Sandy Lake, Highway 102 West Corridor,</i>	- Several comments do not support Sandy Lake and Blue Mountain-Birch Cove Lakes (Highway 102 West Corridor) as Future Serviced Communities - these areas are viewed as more valuable to HRM as parkland, and participants expressed that	The Draft Regional Plan sets out a process for considering the development of Future Serviced Communities, which includes undertaking watershed studies and land suitability

	<i>Morris Lake Expansion Lands, Bedford Best 12, Bedford West 10 and 1</i>	developing these areas will result in net loss of community and environmental benefits. Respondents note that rationale is not provided by HRM for why Sandy Lake should be a Growth Centre. - Consider the addition of green infrastructure in the Water and Wastewater Services Study requirements. - Ensure wildlife corridors are a consideration of Land Suitability Analyses. - Given the climate crisis is the biggest public health crisis of the century, strengthen this policy to the mandatory language of 'shall commit to' rather than 'shall consider'. - Would like to see justification for bringing forward the Future Serviced Communities. - For future growth nodes to be strategic, some existing ones may need to be removed. - Potentially concerned with how "Future Serviced Communities" are described. "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 <u>considered</u> for development, including after considering growth targets. - For the studies and planning process outlined in HC-7 and HC-8, while reference is made to aligning with objectives of the Halifax Green Network Plan, it should be noted that some of these areas under review include lands adjacent to or within areas identified as priorities within the Halifax Green Network Plan. - HC-7 iii) add (i.e. Lucasville Road, Lucasville Greenway and Sackville River Conservation Corridors) and connect the trails to the expanded Sandy Lake Park. In particular, protect now the narrow pinch point of wildlife corridor that runs by what was Heffler's Lumber in Sackville. The walking trails could link through there as well. In the RP, the trail system is called a "backbone" in the plan, however, a trails map(s) is missing. - HRM should redesign the next phase of Port Wallace so there isn't a road through the Barry's Run waterway and soil buffer due to high levels of mercury and arsenic from gold mine tailings upstream, as shown in a provincial environmental study. - Wind Generation: Please stop development on the few existing HRM urban/rural wind energy zones left, so they remain available for wind energy generation. For instance, do not allow housing development on the rural wind energy zone in Eastern Passage as part of the Morris Lake Expansion Site Plan Approval. Wind energy zones are a local resource offering communities an opportunity for energy self-sufficiency.	analyses. Comments will be reviewed and policy related to the Future Serviced Communities process will be clarified through refinements to the Draft Plan.
	Rural Community Planning / Rural Plan	<i>See the Rural Transportation section under Chapter 7 for related comments.</i> - Support for implementing a Rural Community Planning program. - The emphasis on clustered development in rural centers is amazing. Lots of opportunities there, especially in regards to developing service delivery.	These comments will be used to inform the Rural Community Planning Program. The first phase of this work will include technical analysis of groundwater (quality and quantity), options for wastewater management and rural mobility. The Rural Community Planning program

		- Make sure to keep the unique rural character and community spirit of the different rural communities – buildings should have some personality. - Concerns that growth will change the 'small town feel' of rural community. - Ensure that areas like River Lakes are considered in the plan, interest in increased access to sidewalks, traffic calming, service upgrades. - Concerns about including residential uses, resource production, forestry, extractive facilities, mining, renewable energy all under the heading of Agricultural Designation. - New commercial uses (such as a grocery store) should fit in with the village streetscape. - Some concern about urban residents moving to rural areas and then wanting more services (such as streetlights) that existing residents may not want - Traditional buildings and siding are appealing and have stood the test of time. - Some communities feel they have not received any attention from HRM since amalgamation. Need for more comprehensive planning and staff who understand needs and opportunities for providing services to rural communities. - Interest in some communities in more places for recreation, groceries, restaurants, a bank, and retail opportunities (Middle Musquodoboit, Sheet Harbour) - Increasing interest in mobility options – sidewalks, walkability - Would like to see Wastewater management districts. - Drinking water is a serious problem in Musquodoboit Harbour for business (restaurant water quality rules are strict) - Development Outside of Rural Centres: Another downside of ribbon development is that it causes future wildlife habitat fragmentation. - Issue with developments in rural areas. Example is that there is a lot of siltation in Progress Bay because of development and this has caused the eel grass to die. - Please place a "moratorium" on developing HRM's farmland. Most of the farmland in HRM has already been developed for suburban housing. - Lives on Thompson Drive in Wellington and is concerned about the limit of the urban area. Does not feel like they are necessarily rural. Very different than actual rural areas of HRM. Would like to be part of the suburban process. Need sidewalks and services that are offered to people in suburbs. - Would like to be included in the service boundary in Wellington, receive piped services and sidewalks. - Comment that Wellington residents connect more to Fall River, Bedford and Sackville than Enfield and would like the planning to reflect that connection to the urban areas. - Tantallon Crossroads' Growth Centre should go down Peggys Cove Road to include Tantallon itself. - Short-term rentals need to be treated differently in rural areas than urban areas, especially if they are cottages that are not winterized – short term rentals are critical to the economy and tourism, especially because there are few hotels in rural areas.	envisions a co-creation process for community visions or plans; this can focus on the key issues identified through engagement in specific communities. Rural growth centres and their unique characters will be considered as new plans and land use regulations are developed. With regard to short term rentals: On September 1, 2023, new land-use by-law regulations came into effect for Short-term Rentals (STR). In some rural parts of the municipality, tourist accommodations are already permitted for many properties, due to permissive mixed-use zoning and existing provisions. Regional Council has also directed staff to explore approaches to tourist accommodations in rural parts of the municipality; this work is ongoing.
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		- Suggested changes to Conservation Design subdivision – allow roads to be built with gravel to start and pave later. Comments specific to Musquodoboit Harbour: - Residents are working to create community that is walkable, sustainable, and affordable. - Interest in central water and sewage. - Would like to see housing options of all kinds (affordable housing, emergency housing, missing middle, accessible), every lot should allow for more than 1 single unit dwelling. - Food security, education, tourism, circular economy all important to the community. - Need for partnerships, support, and funding – volunteers are being burnt out. - Interest in active transportation trails, rural transportation, watershed protection.	
	Policy-Specific Comments	- Support for HC-9 Rural Community Planning program and policies HC-11, HC-15 - What does the plan get right: SECTION 3.5 - particularly HC-9, HC-11, HC-15 - Comment on HC-9 options for rural mobility. There is value in focusing on partnerships but providing specific examples of partners (ex. Adjacent municipalities, non-profits) could help articulate the range of possibilities for policymakers. - Comments from Ecology Action Centre on use of the term “wilderness area”. - Specific wording suggestions for HC-7, HC-8, HC-9. - 2.7.1 - Recognition of the importance of the open space network and the intent to direct development in a way that protects these spaces and corridors is important both from an environmental perspective, but also for sustaining the quality of life, health, and wellness of residents in the Municipality. - Request to add a policy statement relating to the Halifax Harbour Sub-Designation in Chapter 3, along with the identification of Opportunity sites on Map 2 (Regional Land Use Structure) or Map 3 (Urban Growth Areas). Suggested policy wording is that “Within the Halifax Harbour Sub-Designation, the Municipality shall establish opportunity sites for mixed use waterfront development where siting intensive harbour-related industrial uses is not possible or advantageous due to Harbour suitability or land suitability.” - Height controls should have more flexibility on large sites that have substantial depth from the right of way to allow density, transition, and variety of housing forms. Suggest providing opportunities for increased housing density near suburban post-secondary institutions. The FAR at the levels that have been used on similar sites at major intersections in the Centre designation of the Centre Plan are suggested.	Staff will review policy-specific comments provided when refining the Draft Regional Plan.
	General Comments	- Suggest childcare be added to this chapter.	Staff will review comments as part of revisions to the Plan.

Chapter 4: Community Infrastructure		- 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." - "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.	As part of the Community Planning Program, staff will ensure that childcare uses are permitted in both residential and commercial zones.
	Parkland access & acquisition / Regional Parks Priority Plan	- This doesn't have to all be done through Regional Parks – can happen in smaller places too and suggest broadening the wording. - Comments include support for more parks across HRM and protecting land & access to existing parks. - Happy to see recognition that the park system contributes to ecological connectivity and climate resilience. Suggest recognition of how the park system helps with biodiversity conservation and restoration too. - This section could say more about how the plan for parks will integrate planning to support ecosystem services (e.g., Municipal Natural Assets Initiative work). - Concerns that HRM will become a concrete jungle. - Interest in more dog relief stations in urban areas. - Would like some parks to be more accessible to visit – such as McNabs Island. - Include the AT/Recreation Rail Corridor Spine in the Parks Priority Plan. - Submissions from multiple groups in support of creating a Regional Parks Priority Plan. - Develop a strategic land acquisition program for parks and protected/sensitive areas to ensure long-term preservation. - Further to policy CI-5 to support suitable land uses adjacent to parks, there should be direction to study these lands for park expansion and management. HRM needs is clear park acquisition strategy that considers the conservation and connection of large natural areas. - This section could say more about how the plan for parks will integrate planning to support ecosystem services. - It would be better to commit to trying to provide all residents with access to parks along the full spectrum. - 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. - 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.	Staff will revise the Plan to clarify that what has been termed the Regional Parks Priority Plan is not intended to focus only on "Regional Parks" (i.e. large parks) but for all types of parks across the municipality. Comments received will further refine the policy and help to inform future strategic park planning work. As part of the HalifACT and Green Network Plan programs, staff will continue to explore ways to preserve ecosystem services alongside recreational parks for residents.

		- What's the good in growing the population if we can't keep them active in the outdoors while also respecting our ecosystem and the beautiful creatures that live in the area? - Ensure input from AT, Public Safety, Transit and housing be part of the Parks Priority Plan. Also consultation with health promoters, relevant Provincial departments. - Incorporate the 3-30-300 rule to support mental health. - Easy access to nature is one of HRM's best features. - Include the quarry on Hammonds Plains Road in park protection associated with Blue Mountain Birch Cove. - Extend the Municipality's authority to acquire lands for conservation purposes (rather than solely for parkland).	
	Wilderness (nature) parks <i>Sandy Lake, Blue Mountain-Birch Cove Lakes, Shaw Wilderness & McIntosh Run</i>	- Draft policy proposes intergovernmental coordination on a nature park network. How would this enhance access to a walkable near-urban park like Long Lake? - Pleased to see recognition of Nature Parks in Table CI-1, in support of Sandy Lake, Blue Mountain-Birch Cove Lakes, and the Purcell's Cove Backlands. - Emphasizing the importance of collaboration between all levels of government and conservation organizations in advancing nature conservation, parks, and protected areas. Support continued collaboration and the need for network planning, partnerships and potentially changes to regulation or legislation to support this important work. - 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)? - Long Lake Provincial Park Association is strongly in favor of a "nature park network" with all levels of government and non-profit groups associated with specific parks. LLPA considers that Long Lake Provincial Park is one of the cornerstones of such a network, as it is close to the urban core, accessible by bus and has high visitation. Suggest one of the first tasks of the network would be a conference on near-urban parks to allow HRM to learn from best practices and raise its profile as a city that recognizes access to parks as core element of urban planning. - The current fragmented condition of parks management in HRM is not sustainable in the long run and is contrary to the stated intentions of the new Regional Plan. - so grateful to see nature parks described as community infrastructure. Bus-serviced wild/open space parks would provide access to truly open spaces for city residents that is very hard to find in today's cities, making Halifax really stand out for mental health and recreation. - What is a nature park network? What connects the parks together? Is this a physical network? A management Network. Needs clarification. - Encourage HRM to protect and conserve land at a standard which meets international and national criteria allowing properties under their management regimes to be included in the Canadian Protected and Conserved Area Database. (CPCAD) These	Comments will be reviewed and used to help clarify the purpose and intent of this section. The Western Common Wilderness Area is referenced in the Halifax Secondary Municipal Planning Strategy, however the reference will be made in the Regional Plan as well. Private lands within the Sandy Lake Special Planning Area are being studied as part of the Future Serviced Communities study. Amendments to the designation and zoning for Purcell's Cove Backlands, including Shaw Wilderness Park, will be included in the Regional Plan amendment package. The process to consider the Blue Mountain Birch Cove Lakes area as a candidate National Urban Park is ongoing.

		areas include Blue Mountain Birch Cove Lakes & Shaw Wilderness Park. Sandy Lake has potential for inclusion. Suggest also classifying and conducting assessment of Western Common, McIntosh Run, Five Bridges Lake, Prospect HRM Lands and Aerotech HRM land as potential Nature Parks. - Several areas currently zoned as Urban Reserve are not suitable for urban development and would benefit from designation as Open Space and Natural Resource Lands, such as the Purcell's Cove Backlands. SANDY LAKE - Many indicate the desire to increase the size of Sandy Lake park with concern for the development's impact on park and ecosystem. Comments focused on the proposed and desired boundaries of the park and the relationship to proposed development. - Top 3 Recommendations from Sandy Lake Coalition: 1. Expand Sandy Lake Regional Park to fully protect the area towards the 1971 vision for the area (1800 acres, guided by the McCallum Environmental Consulting report), and stop the plan to fast-track sprawl development next to Sandy Lake - the headwaters on the west side and the south side of Sandy Lake must be protected in order to reduce the risk of damage to the lake that would be caused by development in the area; 2. Implement all actions in the Halifax Green Network Plan; and 3. Incorporate recommendations the Coalition submitted during previous engagement periods for the Regional Plan Review. MCINTOSH RUN/PURCELL'S COVE BACKLANDS - <i>Additional comments on the Purcell's Cove Backlands are captured in feedback for site specific requests Case 22257 and C025 – those sections are found later in this document.</i> - Good to see CI-6 regarding the unique fire-prone ecology of the Backlands and limiting development there. This will also reduce the risk of future fires impacting housing and infrastructure. - Comments included support to use a watershed-based planning approach in the McIntosh Run Watershed. As more areas are urbanized, the McIntosh Run Watershed has three wildland areas which should be maintained, treated as a linked ecological unit, connected with wildlife corridors, and have public access. These areas are Long Lake Provincial Park (LLPP), the Southern Watershed headwaters area, and the Central Watershed (AKA 'Backlands'). Long term vision is that the Southern Watershed area (between Herring Cove Road and Harrietsfield) should also be managed as wildland greenspace and for trails that provide fun human-powered recreation from our backdoors, as well as an economic driver through trail tourism. Support for HRM's plan to conserve a large part of the granite barrens in the Central Watershed area ('Backlands') as greenspace, and allowing new development along Purcell's Cove Road. - The opportunity currently available to create one contiguous park in the middle of the Backlands bordering on the three parks named above should not be lost. The	
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		suggestion in the draft plan that a new Purcell's Cove Backlands Designation and Zone within the Halifax Mainland Secondary Municipal Planning Strategy and Land Use By-law be created would accomplish this goal. BLUE MOUNTAIN-BIRCH COVE LAKES (BMBCL) - As a candidate national urban park, the Plan should recognize the BMBCL as a central city-building opportunity. - Comments included a focus on the proposed and desired boundaries of the park, in particular in relationship to the environmental characteristics of the lands. - Question as to why highway 113 is shown through the middle of the Blue Mountain Birch Cove Lakes (BMBCL) area, which is under consideration as Halifax's Urban National Park and the existing zoning, which seems very ill advised from an environmental health and asset perspective. - BMBCL is a truly unique ecological, recreational, cultural and historic gem, unlike any municipal lands across the country. The area has been proposed as one of Canada's first National Urban Parks. Its irreplaceable nature should be a strong factor in the study regarding future growth and development in this area, and the study should include both lands already designated as park or other protected area, as well as the surrounding private lands that have been flagged as important potential additions to the proposed Blue Mountain Birch Cove Lakes National Urban Park (to be protected by the Municipality or other conservation partners).	
	Level of Service Standards	- Comments included support for establishing level of service standards. - As population is increasing we need to protect green spaces. - Level of service standards, bylaws and policies should be in place prior to or in tandem with making development/growth decisions. - Population data should be factored into future parkland planning and level of service needs, to support equitable access. - A "parkland and outdoor asset needs assessment" could inform divestment, in which case it should provide rationale for any park divestments that are proposed. - Concerned about a low ratio of green space in serviced area, especially downtown with so much infill happening but no more green space added. Would like more parks on peninsula as it densifies. - Everyone should have access to a park by walking. - Level of Service Standards should also consider the walkability of neighbourhoods to wilderness. - For every new or existing ensure it has a beautiful wild space that they can (ideally) walk or bike to - and if not, then drive or bus to easily, within 15 minutes. - Excellent to see a level of service standard for parks will be established and will use an equity lens.	Developing Level of Service standards for different communities (including in the Regional Centre, Suburban and Rural areas) are supported to promote equitable access for residents.

	Community Facilities / Indoor Recreation / Washrooms and Drinking Fountains	- Many comments expressed that community facilities and services are very important. - HRM should recognize that recreational amenities and park access are not all provided by HRM, but some are provided on lands managed by other levels of government, and other institutions. These assets should be factored into park system planning. - Interest in more programming and recreation opportunities at community centres in rural areas. - Would like more volunteer opportunities for kids. - As population has increased in suburban areas some community facilities are getting crowded – example of family driving from Clayton Park to Cole Harbour Place because it's too hard / expensive to get into the Canada Games Centre programs. - There should be more playgrounds spread across HRM. - Consider climate change and biodiversity when planning for and maintaining HRM facilities; commit to examining how facilities could reduce their impacts on climate change and biodiversity. - Need additional volunteer or municipal support for recreational facilities that are operated by community groups. - Rec facilities are not affordable -we need more options for lower income families. - HRM needs to offer spaces for non-profits that are rent free (office space, storage, meeting areas) or provide grants to cover the increasing cost of renting these spaces. - Concern about community facilities like the Mayflower Curling Club and Armdale Yacht Club being pushed out by upzoning and Future Growth Nodes. - Acknowledge other services, such as health clinics pharmacies, convenience stores. - Recreation access is not just about physical access to a building but programming. - Shannon Park would be better used as a year-round festival ground than a housing development. Dedicated site with infrastructure for festivals and events. - Recommend another section of Plan that would speak to HRM's plan to provide free internet access inside parks and facilities. - Request for local recreation program, especially seniors, who cannot drive long distances (e.g. from Downtown Dartmouth to the suburbs). - There is a flood plain risk to the Capt Spry Community Centre, under current circumstances it could be flooded in a monsoon-type event, but this could be avoided with community level planning. - Interest in washrooms being added to more parks – Gorsebrook Park as example.	These comments will be supplied to planners in Parks and Recreation to inform their work and will be reviewed as part of refinements to the Draft Plan. Concerns about gentrification pressures on non-profit facilities will be used to inform community planning programs, which can seek to both support the continuation of existing facilities, and promote co-located facilities in future development through support for affordable cultural indoor space. This work will be informed by the Accessibility Strategy Actions 8, 9 and 10 to audit and improve signage, facilities, trails and equipment for accessibility. Culture and Heritage Priority Plan Action 2.12 is to: Support culturally relevant recreation programming that showcases diverse culture, food, sport and traditions from the region's diverse communities.
	Libraries	- Libraries as integral to health of the community. - Libraries recognized for being valuable parts of the community. It would be good for them to stay open later for kids to study and have tutoring lessons. - Why is the old central library empty? Something needs to be done with this site. - More people access libraries online than in person. If physical structure is required, it should be co-housed in a facility where people are already gathering, like a shopping	Staff will review comments as part of revisions to the Plan. Co-location of community facilities, such as libraries, with other uses is supported in the Plan.

		mall. Library access should be much more electronic and therefore more accessible by more people.	
	Schools	- Many comments expressed that schools are overcrowded and there needs to be a clear plan for how to accommodate new students as the population grows. - How is HRM working with the Halifax Regional Centre for Education (HRCE) and the Dept of Education to tackle the issue of overpopulation at our schools? Is there a new schools planned for our district? Is there sidewalks and roadways for the increased foot and vehicle traffic around the schools? Do we have the right infrastructure to support our over populated school, like buses, playground equipment, crossing guards etc? - Several communities identified a need for new schools – many portable classrooms being used. - After school programming is lacking in HRM, more funding/staff is needed for these services. - Schools can cause traffic issues. - Better connectivity between schools and surrounding communities (trails, sidewalks). - Transportation system investments are needed. Need integrated planning – walking routes to school should be planned at the same time as road recapitalization projects. - As development occurs the streets can become less safe for children – there needs to be more crossing guards, pedestrian crossings, etc. - Kids need safe active transportation routes to get to school. Wayfinding should be added near schools to help with this. - The city should make every effort to liaise with HRCE in advance of approving Strategic Growth areas, to ensure HRCE has adequate capacity or plans to build schools were new dwellings are being enabled. - HRCE is not picking the right areas for schools, HRM should have influence by zoning the lands for the schools near development so kids can walk and bike to school. - New school in Clayton Park is not a good idea.	HRM Planning and Development continuously shares information with Halifax Regional Centre for Education on population growth projections and development. The Strategic Growth and Infrastructure Priority Plan will further consider where and how lands should be identified and preserved to meet the need for future school facilities. Comments relating to safe routes to school will be considered within updates to the Mobility section of the Regional Plan. Staff note that the Public Works business unit is also beginning a Safe School Streets Pilot Program.
	Public Safety and Emergency Services	- Why doesn't the plan discuss emergency communications? - The HRM plan, must include the construction of Emergency Shelter; more than just permitting other structures to be used in an emergency. The Plan must also consider the construction of infrastructure to accommodate storage of emergency food & water supplies. - Can inter-agency emergency management process be expanded to create a broader dialogue around health and wellbeing protection?	Halifax Regional Municipality Emergency Management Division is conducting a Hazard, Risk and Vulnerability Assessment (HRVA) that will consider many of these topics. The Regional Plan will be revised to further emphasize the need for emergency services and preparedness as a critical part of the community planning process.

	Wildfires	<i>Refer also to the Mobility section for additional comments on egress from subdivisions</i> - Many comments expressing concern about wildfire risk and need for second egress in case of emergencies. - Question about how are we stopping single access development? Connectivity was highlighted as a problem in some communities – Dunbrack needs to be more accessible as an emergency exit, Middle Sackville needs a safe way out, infrastructure needs to be ready for emergencies. - Fire hydrant adequacy – need more as development increases. - Tantallon Wildfires – the community feels a bit adrift, needs and wants continuing conversation with city staff on how to move forward. The sense of initial support after the crisis has since waned. - We need to require a Wildfire Assessment for Conservation Subdivisions. FireSmart should be widely shared, not just with developers but also with homeowners... The 80% tree retention requirement for Hybrid subdivision should be updated to align with the latest FireSmart manual.	Comments will be reviewed and used to incorporate greater emphasis on wildfire preparedness as part of the community planning and development process. Halifax Regional Fire & Emergency staff are being trained to undertake FireSmart Advanced Home Inspections and have undertaken 150 assessments as of October 2023.
	Food security (market & community gardens, indoor farming)	- Several comments expressing support for increasing food security. - Consider aligning the definitions for community food security and household food insecurity with those used in the JustFOOD Action Plan and include more recent statistics to provide additional context to the current state of household food insecurity. - Support enabling more residents to produce and sell their own food in their communities. - Significant coordinated action in Food Security is required. - Rural properties should be allowed to raise more livestock than suburban properties - would like to see a specific zoning type for hobby farming, which would allow citizens to grow and raise their own food. - Support for increasing food security in HRM, reasons given include increased food self-reliance and resilience, sustainability. - Make the rules for urban and suburban farming simpler and accommodating. - Accessory structure regulations can be prohibitive for large urban farms. - Concerned that HRM does not understand the infrastructure required to make urban farming a viable possibility - particularly, the conflict that the changes needed to regulations will pose on the status quo – existing by-law – for example, urban farming in a residential neighborhood. HRM needs to develop policies for vegetable farmers in an urban/suburban context, not just to enable the use. - Must 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. Reflect 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,	Food Security will continue to be supported in the Regional Plan and JUSTFood Action Plan. These comments will be considered through refinements to the Draft Plan. The Culture and Heritage Priority Plan includes an action to: Enhance access to community gardens throughout the municipality and partner with cultural communities to create community kitchens and deliver cooking and agricultural support programs, including youth programming. Staff will consider moving policy related to Cannabis Production Facilities to relate to industrial policies, as recommended.

		enhance our ability to mitigate and adapt to climate change, and promote the health and well-being of all residents." - Food Security Paragraph one should note income as the key determinant of food security. - Green roofs: happy allowing green roofs to protrude above the maximum permitted height - HRM should develop further mechanisms to incentivize developers to include green roofs and other food production spaces and amenities to promote more complete communities. - HRM should consider funding opportunities to encourage Green Roof construction under this strategy. - Indoor Farming: 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. - There is a lack of community gardens with HRM that needs to be addressed by the plan to help with food insecurity. Request to require community gardens or support community gardens through DA's or other measures like density bonusing. - Recommend differentiating between community food insecurity versus household food insecurity. - Include a policy that supports the success of local food production and resale by restricting large food corporations (big box stores or fast-food restaurants, convenience stores) from saturating neighbourhoods that have low access to affordable healthy food options. - Urban agriculture is important, but it's more about the agriculture and the gardens in the yards. Green roofs and rooftop gardens tend not to work well in growing food because of cold and wind and cost of the structure. - Scale needs to be the starting point when we talk about urban farms. What is the scale needed for a viable urban farm, Greenhouses are a must in NS. Need to consider making it easier to build greenhouses and do farms, but still need to regulate to prevent poorly built structures, run off and groundwater pollution. Need to consider the retail side of it – farm gate sales can work in some areas, but not everywhere. There are also limits on parking commercial vehicles that can pose a limitation. The rules around employees are important too - where is the cut off where it becomes large scale agriculture. - Concerned that cannabis is part of food security section. More appropriate place would be in Economic Prosperity chapter, after Light Industry.	
	Rural agriculture	- Ensure that environmentally sensitive or important areas are protected from potentially harmful agricultural use. - 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.	Staff will review comments as part of revisions to the Plan.

	Solid waste	- Solid Waste Management is an important part of sustainable society, where the process starts from household sorting and end in garbage facility. It is important to keep solid waste management up to date and get people educated on its importance. - Expand and improve existing waste treatment and waste handling facilities as well as builds new ones. Establish local transfer stations and the waiving of dumping charges for residents, to discourage illegal dumping.	Staff will review comments as part of revisions to the Plan.
	Energy and Telecommunications Infrastructure	- The issues of Energy & Telecommunications are both so significant that they should not be combined in one paragraph; they should each have a dedicated set of objectives/goals, & task identifiers. - Interest in undergrounding power lines to avoid power outages. - Nova Scotia Power (NSPI) does not incentivize developers for undergrounding electrical infrastructure, meaning it adds to development costs to be passed on to future property owners. However, undergrounding has fewer delays with NSP for design review & inspections. Overhead infrastructure can stall for weeks or months waiting for pole staking inspections, deliveries and installations. This impacts roadbuilders schedules. - Suggestion that HRM should encourage NSPI to use manual techniques to remove vegetation where necessary and to leave largely intact buffers with respect to watercourses under high voltage transmission lines; and encourage NSPI to use bridges or bottomless culverts for watercourse crossings where necessary.	Staff will review comments as part of revisions to the Plan. Staff have ongoing discussions with NSPI regarding opportunities to collaborate and planning for future growth.
	Policy-Specific Comments	- CI-4 – will HRM take on a coordinating role across the 3 levels of government and multiple park management groups? If so, does that role extend beyond Blue Mountain Birch Cove Lakes, Sandy Lake and Shaw Wilderness and McIntosh Run? If not, why not? - CI-5 comments • I do not understand the position of Policy CI-5. How will the Municipality ensure that land use is of a suitable use and scale to support the creation and ongoing use of the nature park? Is the wording “to support the creation” relevant here if the park is already in existence? • Policy CI-5 is to study lands in close proximity to nature park areas and ensure land use is of a suitable use and scale to support the creation and ongoing use of the nature park. How will the Municipality ensure that land use is of a suitable use and scale to support the creation and ongoing use of the nature park? Is the wording “to support the creation” relevant here if the park is already in existence? “to support expansion” seems better. Please include direction to study these lands for park expansion, and create a park acquisition strategy to support conservation and connection of large wild areas and the corridors that connect them, such as at and between Sandy Lake, Blue Mountain-Birch Cove Lakes and Purcell's Cove	Staff will review policy-specific comments provided when refining the Draft Regional Plan.

		Backlands/Shaw Wilderness. It is the corridor through Sandy Lake that will preserve biodiversity in the other 2 sister parks. • Encouraged to read CI-5 which states: "The Municipality shall study lands in close proximity to nature park areas and ensure land use is of a suitable use and scale to support the creation and ongoing use of the nature park." This policy mandates the study of the lands contiguous with the Shaw Wilderness Park, the Nova Scotia Nature Trust Lands, and McIntosh Run Park. The policy also mandates that the Municipality ensure that the land use is of a suitable use and scale to support the creation or expansion of the existing parks. - Consider modifying CI-7 h) to explicitly include amount of parkland and number of amenities per capita. - Suggest adding another policy to address relationship between public transit and food access. - In CI-9, adjust acquisition of riparian buffers, wetlands, and islands as public open space to be a requirement rather than a consideration. - Stronger language in CI-22 - use "shall be considered". - Include greenhouses as a permitted structure under CI-25. - CI-26 – replace "may" with "shall" and remove reference to preserved and pickled foods. - CI-28 - including closed-container fish farming within the policy. On-land closed-container fish farms offer an ecologically sustainable way to locally produce healthy seafood protein. - CI-36 – include JustFood Action Plan to include food waste on Solid Waste Strategy - Specific Ecology Action Centre policy suggestions to policies for Parks, Urban Agriculture, Indoor Farming, and Regional Energy and Telecommunications - CI-1 – add "health" to community wellness. - CI-10 - recommend changing the language in "d)" from "by walking or transit" to "by all modes of active transportation. - CI-19 - recommend having a sub bullet which outlines collaboration with various municipal business units, community partners and other engaged groups. - CI-22 – add "working with key community partners to connect newcomers to food production opportunities and agricultural lands." - CI-24 – use "shall" not "consider". - 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 insecurity increasing nationally	
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		and provincially, it can be assumed food insecurity has worsened within HRM as well (hyperlink provided). - Food Security policy CI-22: “may be” should be replaced with “shall be”.	
Chapter 5: Diverse and Affordable Housing	General Comments	- Concern that the ‘Trusted Partner’ program will favour big developers. - Would like to see the Solar City program incorporated into the housing chapter. - Recognize and name housing as a social determinant of health. - Ground floor units should be required to be fully accessible. - Replace “end homelessness and housing poverty in HRM” with “address the root causes of homelessness and core housing need in HRM.” - Open a 3D printed housing market 3D printed concrete housing is quite affordable compared to standard and standard modular housing. One can be printed within days, and the technology is advanced enough to have printed entire villages for similar climates to HRM. - Encourage the establishment of naturalized areas including day-lighting and rewilding within any high density developments. - When infilling of sites/ areas, green space should not be destroyed or developed. - On redevelopment of sites, (especially urban sites), create green space/parks and coordinate adjoining sites if possible. This should also apply to Provincial sites (e.g. schools, community centers and housing developments).	Staff will review comments as part of revisions to the Plan.
	Housing continuum	- Support the construction of diverse and affordable housing options, with more housing across the entire housing spectrum.	
	Public and Affordable Housing	- Dominant theme of engagement: support for maintaining existing housing stock and building more affordable housing across all of HRM. - Repeated support for a moratorium on the demolition of existing housing stock unless there are approved plans for development. Suggestion that tax rates on vacant properties should be doubled to help prevent this practice. - There should be development plans made exclusively for affordable housing, trailer parks as an example. - HRM should focus on housing and prioritize affordable housing. - Low cost housing has not been built for a long time in HRM - Gentrification is a major concern across HRM, families and long-time residents are being displaced both in urban, suburban, and rural areas - Existing affordable housing needs to be maintained so community diversity isn't adversely affected. - HRM should build non-market affordable housing directly, not just fund it. - Expand the Affordable Housing Grant Program to the private sector, make grants more accessible. - What is your definition of ‘Affordable Housing’?	HRM directly supports affordable housing through the Affordable Housing Grant Program, which is available to all registered non-profit or charitable organizations for costs associated with the development, renovation or purchase (including land) of affordable housing units. The AHGP is currently funded primarily through the Density Bonusing program. As part of the Housing Accelerator Fund program, HRM will formalize an affordable housing strategy with dedicated staff.

		- Support accelerating work on enabling and supporting cohousing and land trusts as underexplored solutions to delivering non-market housing. - Several comments on wanting Cogswell to include affordable housing. - Support for co-locating institutional uses with housing and affordable housing. - Support for a municipal development corporation. - Need for mixed-income housing. - Building entrances should be required to meet a standard level of design so that it looks the same for buildings marketed at tenants for any level of income. - Need affordable housing on bus rapid transit lines as many folks who rely on affordable housing don't have a driver's license.	
	Homelessness	- Open more 24/7 shelters. - Women's shelters should not pay property tax. - Homelessness has become an issue across all of HRM in urban, suburban, and rural areas. - HRM should build tiny homes and provide social support for the unhoused population.	The Regional Plan and supporting planning documents will be amended as needed to support a range of housing types, including emergency housing. The Community Safety business unit has staff dedicated to supporting those experiencing homelessness through the Framework to Address Homelessness.
	Housing Crisis	- Housing supply is a major issue – housing supply should be the #1 cornerstone of the Regional Plan. - Housing demand should be reduced to solve the housing crisis. - The plan has not removed enough barriers to housing. - The Plan has conflicting policy outcomes. One of the prime policy objectives is to increase housing affordability, but there are various policies and regulations at HRM that serve to limit housing supply. It is apparent that the Municipality is pushing development to take place largely within the urban area. However, much of this area is already built up and land costs are high for redevelopment to purchase parcels and demolish existing buildings. - More restrictive environmental regulations and an unwillingness to extend the urban service boundary will restrict housing supply. - Students housing is a crisis – need for more student housing. - Need to increase density for more housing. Without drastic action, only those who make \$300k or more will be able to afford living in the core of our city.	On September 26, 2023, as part of the Housing Accelerator Fund agreement, Regional Council initiated a project to amend planning documents to allow for more dense housing development as-of-right. Council directed the CAO to expedite amendments to planning documents so they enable: - A minimum of 4 units per lot in all residential zones within the urban service boundary; - More missing middle housing, with a particular focus on smaller, faster building form and construction, and wood frame construction in the Regional Centre Planning Area, while ensuring water supply and wastewater capacity is considered and existing and proposed heritage conservation areas are exempted; - A public-facing affordable housing strategy with dedicated staff; - More density and opportunities for student housing within a walking distance from post-secondary institutions across HRM.

	Diverse housing types (cluster, tiny, shared)	- There were many comments supporting diversity of housing options. - Support for shipping containers as dwellings - The plan should address access to new land lease communities and incentives to create them. - HRM should encourage the construction of boarding houses. - Support for tiny homes to be used as affordable housing. - Consideration should be given to including Tent and Trailer campground type accommodations in the Diverse Housing model / Housing Continuum. One can envision in the campground model, a miniature walkable village. - Multiple comments interested in promoting /expanding options for cooperative housing. - Modular housing should be permitted. - Houseboats are a great idea, although different rules may be needed for coastal vs non-coastal waterways. - HRM should ensure there are no barriers to 3D printed housing in bylaws. - Look at supports/encouragement for community living. Increases social inclusion, healthy living outcomes, less isolation. Decreases traffic, rents because there are communal spaces instead of everyone having own kitchen/living room, so apartments are smaller. - Allow more than 4 tiny homes per lot within clustered developments – reduces costs and creates stronger communities. - Speaks to housing need for multi- generational families, seniors looking to age in place, students, and young people. - KPIs: It would help to better track relevant data on what types of housing HRM is most in need of. - Find methods to enable narrow-lot 16' townhouses on individual lots, similar to tiny home text. This width is needed to facilitate manufactured townhouse options like are being developed in Mount Hope and Bedford West. Permissive regulations would enable more rapid infill housing options. - HRM should encourage tiny home communities. - Add a statement advocating for universal design principles to improve accessibility.	Staff will review comments as part of revisions to the Plan and the Suburban Community Planning Program. The Halifax Regional Municipality is reviewing and updating its Mobile Home Park By-laws as they apply to land-lease communities (i.e. one in which residents own their home but lease the lot it is placed on. Land-lease communities are also known as mobile home parks, mini-home communities, or manufactured home communities.).
	Seniors Housing	- Strong theme of need for more senior-oriented development and affordable seniors housing - Seniors need opportunities to keep active and healthy. - Senior residents want to downsize but can't afford anything smaller in their neighbourhoods – more housing options needed. - Some seniors are homeless and living in tents, more needs to be done to help them.	Staff will review comments as part of revisions to the Plan.

	Gentle Density / Missing Middle	- Dominant theme of engagement: support for increasing 'missing middle' housing options such as townhouses, multiplexes, and increasing housing density. - Comments include support for increasing the number of units permitted per lot, various comments were supportive of increasing to a range of 4-12 units per lot where services capacity allows, - Comments include support for increasing the minimum residential density across HRM, not just on transit corridors. - Many of the ER zones on Peninsula are some of the most walkable and transit-accessible parts of the city and could sustain much higher densities. - Comments include support for increased height limits on transit corridors and increased unit density, examples given of 4-6 storeys. - Comments include support for more mid-rise multi-unit buildings in residential areas as they can be built faster and there are examples of such buildings mixed in with low density residential areas already across the Regional Centre. - Comments include support for upzoning large swaths of the city to allow multiplexes as-of-right, allow true medium density housing. - Comments include support for increasing missing middle within a block or two of active transportation corridors – helpful for seniors as they age. - Multiple advocates for removing single family exclusive zoning and not prioritizing large estate lots with single-unit dwellings. - Allowing more units across all residential areas would allow the density required to financially support city services and give much needed housing supply to address the current housing crisis. - Supportive of more compact land development like townhouses. - Some rural areas are concerned about increased housing density (apartment buildings) but generally agreed housing is increasingly unaffordable and there needs to be more options. - A 2023 study from New Zealand found that when Auckland upzoned ¾ of its residential land, rent prices for three and two bedrooms declined, suggesting that large scale zoning reforms are effective at lowering rents. - Supportive of minimal lot-coverage restriction. - Support for more high-density housing, especially around the Regional Centre, to help combat sprawl. - Consider a "Right to Return" policy like Mississauga that allows residents to return to their neighbourhood or building after temporary relocation due to redevelopment or renovation. - Support for low and mid rise apartments as their neighbourhood only has single unit dwellings or high rise apartments that are unaffordable	Staff will review comments as part of revisions to the Plan and the Suburban Community Planning Program.

		- Would like their neighbourhood to still feel like home. Open to the idea that more units could be accommodated while maintaining that feeling. - There's a lack of 3 bedrooms, would like to see more. - If zoning has a place in the preservation of a neighbourhood's aesthetic character, it should do so via aesthetic/material considerations applied to the streetscape level only, not blanket restrictions on density. - Several comments critiquing neighbourhood character as a factor limiting density. - The way we discuss neighbourhood character really bothers me. There's a lot of talk about wanting to preserve it, but it always means aesthetic character in this context and ignores the other factors that define a neighbourhood i.e. who lives there. Why aren't demographics and affordability a part of neighbourhood character worth preserving? - I like the neighbourhood character where vulnerable people aren't going homeless, and hard-working individuals aren't spending 80% of their take-home income on rent, sacrificing future financial stability. - High density housing must include access to nature/green spaces and shared resident spaces – Making density buildings our "forever homes" is necessary if Haligonians are going to shift from thinking we will own a single family home most of our lives. - HRM should be focusing on low-rise housing because it's lower in costs and has less crime and less traffic. - HRM permit times should be faster to promote more housing. - Some Bedford residents expressed concern that the unit increase approved by Council for the federal Housing Accelerator Fund will destroy the character of established residential neighbourhoods. Would prefer to see a nuanced approach that conserves established neighbourhoods. - There should be preservation of community character and historic architecture should be kept intact.	
	Height	There were many comments on height, both for and against increased height. Generally, most comments were supportive of increasing height to promote more density, but concerns remain about balancing that height with considerations of shadows and green space. Some areas without existing tall buildings were concerned about added height in their neighbourhoods and what the impacts would be. - Remove height restrictions downtown; remove height rampart and limits on Citadel Hill, skyscrapers should be permitted downtown. - Supportive of increased height along streets with transit. - Concerns among some Sackville residents that building height above 6 stories is not desired for the area. - No towers more than 15m. - Dislike of high-rise apartments, concerns about casting shadow on low density areas.	Staff will review comments as part of revisions to the Plan and the Suburban Community Planning Program.

		- Building 'up' instead of 'out' is a good way to maintain green space and improve efficiency using existing infrastructure. Add height instead of expanding building envelopes outwards – save room for green space on sites. - Minor increases to height seen as potentially helpful e.g. adding a unit on top of a garage. - Suggestion of aligning height in some residential areas with the height of trees. - Would like to see systems like DA's and density bonusing used to improve streetscaping and infrastructure by giving developers additional building height. - Increase heights in corridors and medium density areas. - We should use the FAR system better to allow for taller buildings that have more green space around them. See many Asian cities for examples. - Require bigger bases for tall towers. These towers often have sidewalk shops or offices, with residences or offices in a bigger base up to 4 or 5 stories. The rest of the tower is narrower. Where residences are in the base, they are bigger for families who would likely live there longer. - Perception that developers are changing the rules to get more height, it comes in unexpected areas where people did not know tall buildings were permitted.	
	Backyard and secondary suites	- Support for backyard and secondary suites. - Questions of how backyard suites can impact groundwater supply. - The city should explore incentives for developers to go the extra mile in exchange for a expedited permitting process. For example, provide and expedited approval of subdivision plans and associated building permits where the developer grades lots and services them to accommodate immediate or future backyard suites should the ultimate owner of the dwelling wish to have one, now or later. - People are building backyard suites and other accessory buildings without concern on impacts to drainage outside the immediate property. Regulations for lot coverage and permitting backyard suites should include some form of drainage consideration to ensure abutting properties are not negatively impacted as more surface area that normally slows overland drainage is removed. - Suggest that on residential lots throughout HRM a 50% lot coverage maximum and a 0.5m minimum side yard would make backyard suites feasible for many more sites (HRM has tended to use lot coverage in the max 35%, and this lot coverage max prohibits achieving gentle density goals). Controls on total footprint could safeguard against very large developments on large lots. - Backyard suites should not be limited to single floors – increased height should allow suites above garages.	Staff will review comments as part of revisions to the Plan, and comments will be supplied to inform amendments related to the Housing Accelerator Fund program. A regional groundwater study will be undertaken as part of the Rural Community Planning program before land use by-law regulations are adjusted to permit significant additional units per lot in rural areas.
	Adaptive Reuse/ Commercial conversions	- Support for salvaging materials from demolished houses. - Support for office to residential conversion.	Staff will review comments as part of revisions to the Plan.

		- Re-use building materials salvaged from dismantled buildings, to construct affordable housing. Re-using materials can be a challenge if the Building Code is applied without using professional discretion. - When converting industrial buildings to housing, you must include greenspace for the children and for the environment. - Ensure sufficient green space and/or naturalized areas and to include green areas, parks and other amenities.	
	Municipal Tools <i>Density bonusing</i> <i>Inclusionary Zoning</i> <i>No net loss</i>	- Interest in new developments such as St Patrick High School land including affordable units. - Support accelerating work on inclusionary zoning, density bonusing, and no net loss housing policies. - Are there ways to ensure some affordable units in new buildings? - Alternatively, is there a way to cap the amount of profit building owners can make (e.g., they submit their operating expenses each year, and can only receive x% of profit over those expenses). - Several comments of support for inclusionary zoning. - Concern that "No Net Loss" and "Inclusionary Zoning" policies could be unhelpful. Creating more barriers for developers to navigate will almost always have a negative effect on the amount of units built. Looking to other housing crisis' in other places that have happened in the past the answer for creating low-income housing has been and always will be: BUILD MORE HOUSES. - "No Net Loss/Rental Replacement" requires redevelopment to incorporate the displaced residential units in the new development. Do you have a model to follow from other jurisdictions to do this? - There are many examples (e.g., Detroit) where incentive/bonus zoning/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. - Incentive zoning (H-18) - Need to define what are the types of public benefits that are applicable. - Additional developer charges such as density bonusing or inclusionary zoning increase costs for everyone else in the market, as they are passed on to future landowners or renters. Propose additional density bonusing costs should be paid just prior to occupancy to reduce the amount of time a developer or builder will need to carry interest rates on the fee. - Inclusionary zoning may increase costs so that some developers' financing is refused; they may invest in more competitive jurisdictions; or tenants/purchasers can't afford new units. Instead of raising tax rate Council gives responsibility for housing to new tenants and purchasers. Will likely lead to smaller pool of developers and less housing being built.	Staff will review comments as part of revisions to the Plan. Options for an inclusionary zoning program are being explored and will include a consultation with stakeholders including development industry, non-profit housing groups, community organizations, provincial and federal departments and agencies. "No Net Loss/ Rental Replacement" will be explored through future study.

		- Comment from development industry that density bonusing policy raises rents in the building – requests that HRM consider letting developers sign agreements to keep a certain number of units within the building as affordable for a specified length of time to keep units in the building more affordable. Gave examples of paying millions for that bonus and increasing rents to offset that loss. - Density Bonusing should include storm water retention, tree planting, green space and money in-lieu must not be used as away to allow more density and site use while not allowing/ building/ funding of green spaces and parks. The Incentive or Bonus Density concept should be utilized in particular where there is little or no green space and parkland. - Support for mandated affordable units in the development, but not for cash-in-lieu programs. - Request that the Plan include policy directing HRM to become directly involved in the provision of non-market housing and community health and support services.	
	Short term rentals	- It should be easy for homeowners to host renters or boarders. - Restrict / ban AirBNBs, have stronger enforcement. - Seasonal residences should be allowed for short-term rentals. - Take a strong stance against Short Term Leases.	Regional Council has adopted region-wide regulations for Short Term Rentals , which came into effect on September 1, 2023. Work is ongoing to determine if adjustments should be made to the regulations in rural areas for rural tourist accommodations. Potential impacts on housing availability will be considered.
	Removing parking minimums for housing	<i>See the Chapter 7, Mobility, 'Parking Requirements' section for related comments.</i> - Many comments of support for removing parking minimums for new residential developments. - Request for the language in this section to be stronger – request for the full removal of parking minimums across the entire HRM. Change "Municipality shall consider reducing or removing parking minimums..." to "Municipality shall remove parking minimums..." - Concern for parking availability as part of gentle density	Parking minimums will be considered as part of amendments related to the Housing Accelerator Fund. The Regional Plan will continue to encourage limited parking to increase opportunities for housing, especially where transit is available.
	Policy-Specific Comments	- Support to change the language of 5.2.4 to Shall instead of Shall Consider. - H-29 – use "shall" instead of "may" to indicate stronger commitment to Community Land Trusts. - Concerns about policy H-5 – is it not covered by other policies (e.g. H-2)? Seems like H-5 is an added step and potential barrier. - H-10 - add a bullet on assessing access to transit and walkability to services and amenities to satisfy the complete community commitment and objective #5. - Policy H-12 should be a shall instead of a shall consider. Recommend that the Plan commit to finding a new formula / guideline for determining parking requirements in a project.	Staff will review policy-specific comments provided when refining the Draft Regional Plan.

		- Add an objective promoting safe condition of housing through proactive enforcement of Bylaw M-200 and the Residential Rental Registry (R-400).	
Chapter 6: Environment	General Feedback	- Comments recognizing attention to environmental principles and climate change, stronger than previous plans, but a desire for the environment to take an even more important and leading role in the plan. - Many comments were received urging stronger wording to make the policies more mandatory – i.e. the regulatory language should be 'shall' instead of may or may consider. - Chapter 6 should be reordered to be earlier in the plan. This would elevate environmental sustainability to a more prominent position and make it possible to refer back to it when reading the rest of the plan. - Consider defining 'district energy' and 'microgrids'. - The chapter starts with a statement of commitment to Netukulimk but the partnership that allows it to develop and function is missing from the objectives and also from the rest of the chapter. Incorporating the commitment to Netukulimk into the policy requires discussion with Mi'kmaq groups, but as a start Objective 1 can include Mi'kmaq organizations. - The concept of <i>Netukulimk</i> is invoked here but is tokenism if there are 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'kmaq could be an Objective in section 6.1. - Would like HRM to work with the Department of National Defence to preserve the sensitive bird-habitat and coastline of the Hartlen Point, Eastern Passage/Cow Bay MPS. HRM should increase the expectation to traffic study instead of just impact statement. - HRM has made considerable progress on resourcing and implementing HalifACT in recent years, particularly with respect to mitigation actions. Mitigation is important, but it isn't everything. HRM needs to focus its efforts as much on adaptation - including support for floodplain mapping, coastal management, and the Municipal Natural Assets Initiative (MNAI). - Pleased to see the effort put towards the goals of protecting green space, increasing public access to green and blue space, improving biodiversity, and restricting development within floodplains or critical watersheds. - Consider equity and health benefits as part of Municipal Natural Assets framework valuation. - Developers should not be allowed to clear everything off the land and then have it sit undeveloped for years. It destroys the forest & wildlife habitat, and causes flooding from rain runoff. - Environment needs to take precedence over development.	Staff will review comments as part of revisions to the Plan.

		- Require the daylighting of rivers and streams as part of infrastructure upgrades, to create more aquatic wildlife corridors and better storm water management. - Support for sustainable building practices. - 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. - Look at Pan Canadian Nature Guidelines and their 5 Pillars – engaging the public with nature – incorporate into RP policy. - We need to do better at locating and protecting land with endangered or at-risk species. - Need to make sure we protect the environment (wetlands, forests) even in a housing crisis. - Concern that development proposals are considered on a case-by-case basis, rather than cumulatively, to determine impacts. - The Municipality should reference Nova Scotia's commitment to protect 20% of Nova Scotia's lands and inland waters for conservation by 2030 and could play a leading role in contributing to this target. - Suggest adding objectives on Indigenous partner engagement; addressing historic issues of environmental racism; and support extreme weather emergency response infrastructure (eg, warming & cooling centres). - Developers need to be held accountable to saving environmental features and ecosystems when they build. Considering aspects of landscape ecology is vital...it allows for enough of an ecosystem to be left to support wildlife and provide. - The ability to donate land for conservation is attractive. - HRM needs to better understand the cumulative impact of development in close proximity to each other, particularly in reference to traffic, environment, and community. - There is no mention of watersheds in the objectives. - Waste/resource management" is an odd open space if one thinks of recycling plants, landfills and composting facilities. This land use doesn't fit with what the other spaces imply. "Natural resources" cover resource management. Waste management is more appropriately an industrial activity. - The shopping cart by-law is poorly enforced and HRM Staff are reluctant to enter watercourses to remove abandoned shopping carts that have been reported.	
	Regional Green Network	- Implement all 79 actions in the HGNP. Of the 79 actions in the Plan, 33 state that they will be implemented through changes to the Regional Plan during this Regional Plan review.	Staff will review comments as part of revisions to the Plan.

		- Need for HGNP to be foundational to all work undertaken in the Municipality, with all departments showing how work aligns. - Support for HGNP to be implemented at a site and local level, with on-ground truthing needed. - Use stronger language in EC-1 to ensure that the Halifax Green Network Plan is implemented as part of municipal decision-making. - The commitment in EC-2 to maintaining biodiversity and climate change mitigation is positive (use of the word "shall" is important here), but implementation may be challenging and mechanisms should be put in place to ensure this commitment is met. - Consider a strategic land acquisition program to identify and acquire lands for conservation purposes. Intact coastal habitats, as well as floodplains, provide essential nature-based solution to climate change, mitigating climate change impacts, and managing stormwater and flooding. A focus on acquisition of these important lands, or support for acquisition by the Municipality's conservation partners could also be referenced specifically as a priority strategy. - Prohibiting residential development on new roads with the Open Space and Natural Resource Designation is important. - The Protected Area Zone is a positive element and complements the conservation efforts and protected areas of partners like the Nature Trust. - The Municipality has important partners in planning, creating, and maintaining a regional green network, and such partners (government and non-government) could be acknowledged in the Draft Regional Plan. - Please strengthen The Regional Plan and Green Network Plan to support connected wildlife migration corridors and networks of pollinator plants along boulevards, parks, and public spaces. Encourage property owners and developers to plant habitat rich gardens instead of lawns, including water gardens for flood control.	
	Wildlife corridors	- Some confusion and requests for clarification over terminology of the corridors, and how it differs from the HGNP. - Repeated acknowledgement of vital importance of green corridors. Conservation science clearly demonstrates the need for ecological corridors and landscape connectivity. - The Municipality could be a national leader in this area. It will be essential to ensure that this commitment is clear to all departments and programs within the Municipality and that mechanisms are in place to ensure these commitments are put into effect. - Focus on areas where development has not happened yet for corridors. - Exciting to see commitments to major connectivity infrastructure across highways and utility corridors.	Further analysis of the Corridor policy and Map 6 (Wildlife Corridors) is underway, with consideration of detailed delineation of corridors and the tools applicable for various corridors types and application types. It is expected that multiple tools for regulating development will be required, as well as ongoing programs to explore opportunities for restoration. This is expected to require ongoing work as part of the Halifax Green Network Plan program.

		- The Purcell's Cove Backlands are an important green corridor for people and wildlife and connecting the larger green spaces and conservation areas in the Long Lake and Herring Cove Provincial Parks - Wilderness corridors should be given names and signs – similar to how we provide signs when roads cross streams and rivers. - Not supportive – the corridor concept is outdated as the concept of natural corridors interconnecting natural areas is not a means to preserve current biodiversity or restore lost biodiversity. - Would like the Regional Plan to address wildlife corridors more directly, for example mentioning overpasses AND underpasses for animals. - Require all new development to demonstrate its impact on and contribution to the desired outcomes of the HGNP. - Would like Red Book updated and Halifax Water's White Book updated to address fish passage, including for dams and water control infrastructure. - Enable open space lands for wildlife corridor purposes to be given as parkland credit, instead of having developers carve out land as open space to be dedicated to HRM. - Need genuine science guiding why development should be restricted for certain parcels. Current plan/policy could be challenged at UARB. Allowing flexibility to trade off development rights would help, otherwise could be seen as backdoor expropriation. - 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? - It would be helpful to provide more context in the Draft Regional Plan about how the High Ecological Value areas (shown on Map 6) were defined. The areas should also be revisited and refined as there appears to be important gaps (such as Wilderness Areas and priority corridors identified in the HGNP missing from the map). It would be helpful for the Municipality to reach out to other conservation experts to ensure the High Ecological Value areas are comprehensive. It is unclear why 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. - Revise Map 6 to include the Sackville River –Sandy Lake Corridor. - Include important corridors as well as essential corridors in the Regional Plan. This would align with the HGNP 4.1.2 ("Important Corridors are connections between natural habitats, the loss of which would impact local connectivity but are unlikely to impact overall regional connectivity"). - Essential and Important Corridor widths should be at least as wide as stated in the HGNP. Essential and Important Corridors that follow watercourses shall a minimum width of 100 metres. - High ecological value - the maps identified areas of high ecological value. Please work to ensure that these areas are protected, and that there are corridors for wildlife to	
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		move between areas. Islands of biodiversity may sound great, but wildlife want to (and need to) move! - Disagree with EC-12 to permit subdivision within an Essential Corridor Area-1 (ECA-1) by development agreement. It removes the true purpose of an Essential Corridor. It also conflicts with the intent of EC-11- i). - Would like easement across Brian Dickie Drive to connect the Little River Greenway Active Transportation spine. - Replacement and protection for wildlife corridors throughout HRM. A specific example is that most of the important wildlife corridors leading out of the Backlands to large areas of Crown Lands such as Terence Bay Wilderness Area have already been blocked and require remediation, including at Old Sambro Road and Dunbrack and along the Herring Cove Road especially near Long Pond. - Protection and reinforcement of the corridors and pinch points that remain must be a conservation priority including those at the west end of Williams Lake/Colpitt Lake and Governors Brook, connecting to the Shaw Wilderness Park, and those connecting the Shaw Wilderness Park to Purcells Pond, Flat Lake and Pine Island Lakes.	
	Naturalization and Urban Forests	- Support for naturalization policies. - Several requests for additional staff to support the Urban Forest Management Plan. - Several requests for an update to the Urban Forest Management Plan. - Updated Urban Forestry Plan should include wilding projects and work as part of the green network plan to create wildlife corridors (ex. native fruit or nut trees for birds). - Introduce a by-law to ensure protection and replacement of trees on private property. - Should use Urban forestry masterplan update to make Halifax more bird friendly – adopt bird-friendly design standards. - Add: Floodplain Mapping, Zoning and Stream Gauging to be part of the naturalization and asset management within this section; add c) Protection of large undeveloped blocks of land including Sandy Lake Lands and Feely Lake. - Add a section to deal with the coming concern that Hemlock Woolly Adelgid is now in HRM and will need funding and dedicated staff to prevent loss of significant hemlock forests including Hemlock Ravine and Sandy Lake and others. - HRM should have a Tree Retention By-law for the entire municipality, to include riparian buffers. There is devastation caused to Sandy Lake, ongoing, from the Armco clear cut of 2013. Individual trees in HRM as well as large portions must be protected from cutting that is currently allowed by this current lack of protection.	Public Works' Urban Forestry group is currently undertaking an update to the Urban Forest Management Plan.
	Watershed Management	- Support for watershed approach to planning. - Watershed management is a dynamic and evolving process that requires ongoing commitment, coordination, and adaptive strategies to balance the often-competing demands of water use, conservation, and ecological health within a watershed.	The Environment & Climate Change group is undertaking work related to Watershed Management Frameworks, which is supported in the Draft Regional Plan.

		Effective watershed management can lead to more resilient ecosystems, improved water quality, and sustainable water resource use. - Several comments supportive of community-based watershed management frameworks but concerns that it relies too much on volunteers and community organizations and should be driven by HRM staff. - Would like the full McIntosh Run and Williams Lake watershed studied prior to further development. - HRM should delineate watersheds by the natural boundaries and not defer to artificial sub areas. - HRM needs more watershed protection, should rely on experts more. - Concerns that marine aquaculture uses are violating regulations and affecting water quality. - Concerns that mineral investors contaminate wells and do not clean them up. - Prohibit the development of roads, crossing or other upstream land uses that could potentially contaminate downstream properties, especially where an upstream watercourse contains known contaminants that could have downtown stream impacts if disturbed. - Endorse creation Watershed Management Frameworks and recommend a stronger commitment to watershed planning and using watersheds to guide development decisions. Consider engaging the Regional Watersheds Advisory Board with this action and creating publicly available watershed maps. - Need for specific and accurate watershed mapping, especially in advance of the Suburban Planning program. - Watersheds need to be properly mapped and considered when planning for land uses. The Spryfield area would be a good case study for the municipality to use new data to update the watersheds. - Developing a Watershed Management Framework is excellent, and the twelve considerations outlined are important. HRM must ensure that these considerations are actionized. - As development progresses and the framework is actionized, HRM should seek advice and input from the Regional Watersheds Advisory Board. - Many watersheds cross Municipal boundaries and HRM Staff should take the lead in inter-municipal watershed planning. - HRM should consider Watershed Conservation Authorities similar to those in Ontario.	
	Water quality / Lake Monitoring	- Support for the lake monitoring, but criticism that it doesn't address all the lakes. Water quality in rivers should also be included - Concerns about the water quality of First Lake with development nearby. - Concerns over water and how to balance water quality with density. - Keep wastewater out of Lake Thomas.	Environment & Climate Change leads the LakeWatchers program, which is supported by the Regional Plan. Surface water quality is also a responsibility of the Province under the <i>Environment Act</i>.

		- Williams Lake needs to be protected. - Protect Ragged Lake from future erosion. - Fraser Lake's water quality has decreased because of Timberlea Estates. To save Nine Mile River you must look upstream. Leave a natural buffer by the lake.	
	Riparian buffers / Watercourse buffers	- Comments include support for a 30m riparian buffer and reflecting the importance of riparian areas. These areas help filter pollutants, control erosion, and provide habitat. - This is an improvement from the HGPN recommendation of only increasing the buffer for watercourses wider than 50cm. Now all watercourses will have a 30m buffer. - Would like the buffer to be significantly wider/larger than 30m. - Support for protecting natural buffers around lakes and rivers to protect water quality. - Would like the watercourse and wetland buffers to be publicly owned. - Increased watercourse buffers will lead to a reduction of lots and may impact subdivisions that aren't yet endorsed but are reflected in approved DAs and Concept plans. Propose that all active Final Subdivision applications be grandfathered under the existing requirements. This would avoid costly re-designs. - Allowing flexibility to create smaller lots or relocating density elsewhere in a development would help mitigate loss of overall density, and help secure support for setback increase from development industry. - Concern about 30 metre buffer from waterbodies rendering their property undevelopable. - Asking for flexibility for existing sites – proposed increase should only apply to sites created after Plan adoption and/or where there is unreasonable impact on existing sites. - Adding people to the Watershed should be achieved through redevelopment and selectively adding density and moderate density new developments near existing transit-served arterial roads, not sprawl. We recognize that existing neighbourhoods will change as a consequence; fair planning means considering the needs of the natural environment and all Haligonians, including future Haligonians. - 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. - Vegetation within riparian buffers should be reconstituted to a natural state where possible by landscaping and plantings. - HRM shall develop an outreach or education plan to educate the public on the vital importance for protection of wetlands and riparian buffers in relation to water quality. - Very little attention is given to identifying and inspecting existing riparian buffers and setbacks with respect to tree and vegetation removal. By-law enforcement must not only be complaint driven. During the construction process it must be the responsibility of the Building Inspector or Development Engineer to monitor the site for proper sediment control and the protection of trees and other vegetation within the riparian buffer.	Staff recommend proceeding with the approach for a 30 m buffer as presented in the Draft Regional Plan. Provisions for existing development will be considered in the land use by-law regulations, consistent with past practice. Public Works' Urban Forestry group is currently undertaking an update to the Urban Forest Management Plan. This work explore additional opportunities for tree protection.

		- After and outside of development, trees and vegetation are often removed from the riparian buffer. Every 3 to 5 years (or on sale of property), all riparian buffers should be inspected for integrity. - Where vegetation has been removed in contravention of the by-law, it should be reconstituted at the owner's expense. Where structures are found that are not permitted under the provisions of the by-law, these structures are to be removed or relocated at owner expense. - Any of the structures listed in EC-25 should only be developed in an environmentally sensitive manner. - McIntosh Run - The buffer should be between 150 - 250 metres, to allow space for the waterways to swell with rains (this summer has taught us all a lot about flooding), to better protect the waterways from development, runoff, and allow for vegetation to grow - Areas designated Urban Settlement in the maps accompanying the draft plan - please input greater buffers (150-250 metres) between waterways and development, especially along the McIntosh Run, its associated streams (from Roaches Pond, Porcupine Creek, etc.) as well as Kidston Lake, Long Pond, Three Corner Pond, Sheehan Pond. - HRM should calculate it the same way the province does (20m and slope, like current) - The Regional Plan should clarify that the buffer is measured to the edge of the building, not to edge of area being disturbed - For minimum watercourse setbacks good that the more stringent shall apply, 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. - HRM should acquire riparian buffers.	
	Wetlands	- Many comments on the importance of wetlands and wetland protection – they should not be developed. - 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. - Several comments that all wetlands need to be protected and have a buffer applied, regardless of their size or whether they are contiguous with other water courses, and not just wetlands identified as a Wetland of Special Significance (WSS). - Like how the Regional Plan addresses wetland protection, but not how this is limited to wetlands that have watercourses. - The Regional Plan doesn't address vernal pools (e.g., seasonal wetlands). They should be identified and acquired. - Wetlands are needed for flooding – does not want buildings in them.	Regional Planning, together with staff from Environment & Climate Change, are further exploring ways that the municipality may better protect wetlands. It is a challenge to include buffer requirements from wetlands, as currently, wetland alteration permits can be granted by Provincial authorities prior to applying for municipal development permits. Staff recognize that a lack of comprehensive wetland data limits the municipality's ability to protect wetlands. Comprehensive wetland data is required for Future Serviced Communities and Conservation Design Development, as land suitability assessments are undertaken as a first step in the planning process.

		- Would like to see constructed wetlands. - Desire for better wetland data collection to inform decision making. A municipal wetland inventory is needed. - Recognition of wetlands as a valuable carbon sink. - The municipality can play a key part in ensuring certain wetlands are never altered by helping the Province to identify local Wetlands of Special Significance - working with the Province on wetland protection and restoration is key. - All wetlands – not only those contiguous with a water course, or WSS (EC-34) – need buffer protection from adjacent development. - While the municipality requires “the proponent to verify the existence and extent of any wetland” on a development application, the policy needs to go further and require that proponent provide the outcomes of provincial decision on wetland alteration applications. - Wetlands in general should be considered with more caution and definition. As it stands, with so few wetlands actually designated, many wetlands and watershed areas are at risk.	
	HalifACT	- The Plan should be explicit on how HalifACT and the HGPN guide development decisions.	Staff will review comments as part of revisions to the Plan.
	Stormwater and Flooding	- Would like to see LID - low-impact developments, more rain gardens etc. Less hard surfaces and more soft landscaping. - The stream daylighting policy is improved but still weak as it puts the onus on volunteer groups. - HRM must identify and map "at Risk Properties" (at risk from things like fire, flood, wind, heat, cold, etc) and provide this information to residents. - Comments on the flooding in 2023 – never had seen anything like it, very destructive. Floods can also cause issues for egress as roads wash out. - Flooding can contaminate water sources as runoff goes into watercourses. - Want a plan to address inland and coastal flooding. - Would like to see changes to ensure that land filling considers runoff impacts to neighbouring properties. - Support nature-based solutions that will help prevent flooding, but recommend the explicit addition of trees/tree cover, promotion of plants native to Nova Scotia, and protection/restoration of wetlands included. - Support for utilizing green infrastructure and nature-based solutions to climate change to manage stormwater and improve climate adaptation. This work should be expedited and include tree retention, promotion of native NS plants, and protection/restoration of wetlands.	Staff will review comments as part of revisions to the Plan. HRM and Halifax Water work together on stormwater management policies and processes, and the Regional Plan supports this ongoing work.

		- Need to manage storm water at the site, or at least find ways to treat it before it reaches waterbodies. Example requiring artificial wetlands and retention ponds on properties or in developments (Ex. Dartmouth Crossing). - Need to encourage better stormwater management for new and existing developments. - Support training initiatives so that residents and professionals can maintain naturalized features. - Untreated stormwater should not be directed to natural waterways.	
	Floodplains	- Do not just limit development in floodplains, prohibit it. - Define specific criteria for what constitutes "adequately flood proofed", do not leave these criteria open to interpretation. - The Sackville River Floodplains are very important, and there shouldn't be development in them. - Support for HRM wide policy, clear precise policy that covers all floodplains in all of HRM, not just Sackville River. - Concern that work related to the Sackville Rivers Flood Plain study has not progressed. - Need to initiate a buyback program for the full Sackville River Flood Plain, not just in Bedford. - Request to map and zone all floodplains; consider adopting the 2017 CBCL Sackville Rivers Floodplain Study; work with the province and environmental organizations to restore wetlands, where possible, for flood mitigation; create a policy for acquisition of flood prone properties; and preserve natural floodplains and wetlands to allow for natural flood attenuation. - Floodplain mapping plays a critical role in minimizing the impacts of floods on both human and natural systems. By providing essential information about flood risk, it helps communities and individuals make informed decisions, reduce vulnerability, and enhance their resilience to one of the most common and destructive natural disasters as we witnessed in the summer of 2023. - HRM must start Floodplain Mapping, Floodplain Zoning and Stream Gauging for all watercourses in the municipality. - HRM should create a policy for acquisition of flood prone properties. - Any lands that were infilled should be restored to pre- existing floodplain grades. - HRM should create a policy of working with adjacent Municipalities on Floodplain mapping and zoning on rivers that cross municipal boundaries. - Replacement of bridges and culverts should be designed to manage at least the 1/200 year or the worst 1/100 year anticipated flood to allow for increased flood flows due to the effects of climate change. - Restore and re-constitute wetlands where possible for flooding mitigation and ground water recharge.	Staff will review comments as part of revisions to the Plan. The preamble will be adjusted to more clearly identify the intent and scope of future work regarding flood risk. Planning & Development staff are currently working to update the land use by-law regulations for the Sackville and Little Sackville Rivers Floodplains.

		- Why does the HRM policy only apply to mitigate the consequences of flooding along major rivers only? Regulations should apply to all rivers. - This section is inadequate considering the extensive climate change adaptation needs associated with flooding and flood plain expansion. The text does not refer to how flooding has become more frequent with more intense storms (climate change), exacerbated by continued hardening of the landscape with urban expansion. This section should incorporate climate change adjusted flood mapping into floodplain management. Include a policy to address flood plain expansion due to climate change and incorporating climate change projections into the flood plain zoning.	
	Coastal Protection	- The municipality needs a coastal plan and a watershed strategy to provide consistency in planning, development and environmental protection along the coastline and the inland waterbodies and watersheds that drain to them. The coast is part of almost every plan area in the municipality and is under great development pressure and/or impacts of climate change. The municipality needs a strategic approach to managing the coast; it needs coastal planning. - HRM should gain jurisdiction over pre-confederation water lots because too much infilling is happening on the Northwest Arm. - Wants less high density on waterfronts and coastal areas. - Sea level rise is coming, we need Region wide coastal protection and development. - Support for a Coastal Protection Act. - Need to protect coastal roads. - Several comments supporting need for coastal protection and preventing development along the shoreline. - 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. - While it is encouraging to see reference to sustainable coastal management and policies to limit development in areas vulnerable to climate hazards, the same consideration should be extended to ecologically important coastal ecosystems and habitats (for example those providing important biodiversity values, ecological services, supporting species at risk, high concentrations of biodiversity or habitat for migratory birds). - HRM should apply to change the HRM Charter so that the municipality can extend land use planning and development controls to water lots, before they are filled. Water lots require oversight, and since the intent for infilling is to create land, the municipality has an interest in regulating extension of the land's edge to create dry land. The current policy suggestion picks up regulation after the damage has been done. - The HRM coastline is arguably the most complex in the province and uses need careful management. Coastal planning and management need the same attention in this plan as that given to watershed planning and management.	Staff will review comments as part of revisions to the Plan. HRM made a submission on the province's proposed Coastal Protection Act regulations in 2021. In the meantime, HRM is working to limit development in vulnerable areas. On November 14, 2023, Regional Council directed staff to initiate a process to consider amendments to the Regional Centre Secondary Municipal Planning Strategy, the Halifax Municipal Planning Strategy, the Regional Centre Land Use By-law, and the Halifax Mainland Land Use By-law to restrict water lot infilling on the Northwest Arm. Regional Council further requested Request that staff engage with the Federal government to explore the Minister's willingness to adopt or otherwise permit further restrictions with respect to infilling in Dartmouth Cove and prepare a supplemental staff report regarding the initiation of by-law amendments to the Regional Centre Secondary Municipal Planning Strategy to restrict water lot in filling in Dartmouth Cove.

	Renewable energy and Wind Energy	- Energy should be its own chapter, with renewable energy as a subcomponent. - Why is solar city not mentioned in this chapter? There is conflict between the Solar City program and increasing building height – i.e homeowners make the investment and then lose direct sun access as tall buildings are built near them. - HRM should develop an off-big-grid option and plan for Regional Energy. - National building strategies and codes should work towards off-grid self-reliance. - Every new building should be off-grid or semi-off grid. - 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 in EC-70. - Good to have EC-75 restrictions in place - Industrial-scale projects, like wind farms, are incompatible with what is trying to be achieved through Regional Parks, Conservation Areas, etc. - Wind Generation: Please stop development on the few existing HRM urban/rural wind energy zones left, so they remain available for wind energy generation. Wind energy zones are a local resource offering communities an opportunity for energy self-sufficiency. - HRM could, in addition to the suggestions in EC-67 to EC-74 become a more active partner in developing alternative energy. If one looks at the energy consumption by the HRM government alone, there has to be a case for HRM to invest in alternative energy for its operations and infrastructure. - Support for more EV chargers across HRM.	HalifACT includes many actions related to renewable energy that HRM's Environment & Climate Change team are addressing in ongoing work. Staff note that some actions related to energy efficiency are tied to Building Code requirements, which are Provincial and Federal and cannot be regulated through a land use by-law.
	Climate Change / Greenhouse gas emissions	- Strong theme of engagement were comments expressing concerns about climate change and that we need to take urgent action on the environment. - HRM should have a ban on golf course development, motorsport facilities, coal mines, and oil/gas developments. - HRM should identify metrics to be used in the success of sustaining biodiversity. - There should be a direct reference to transportation action when acting on climate change. - Implement extended producer responsibility and deposit return scheme for different types of products. Implement a circular economy and promotes it. - Climate Action is necessary and important work, would like to make sure climate remains a strong message in the Draft.	Staff will review comments as part of revisions to the Plan.
	Policy-Specific Comments	- 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 they can actually be supported on the ground, AND work in insights from the MNAI work.	Staff will review policy-specific comments provided when refining the Draft Regional Plan.

		- EC-16 is too vague and needs to be elaborated upon. - EC-17 use stronger wording than "shall consider" urban forest? If not, use stronger wording. - Suggested rewording for 6.3.4, EC-21, EC.52, EC.64 to clarify meaning and improve understanding. - Comment on changing EC-53, & EC-59 to completely prohibit development in floodplains. - Support for the entire Chapter 6 particularly EC-15 (naturalization program), EC-24 through to EC-31. - Suggestion to include AAAA bike networks in this chapter (AAA networks + All season) as encouraging non-car modes of travel will reduce greenhouse gas emissions, air pollution, noise and traffic congestion. - HalifACT relies on the pillars, principles and actions of the IMP to guide its climate change policy and actions on the transportation front. Is this assumed within Policy EC-36 or should it be made explicit? - What is the reasoning for Policy EC-39 re Cow Bay Lake? - Endorsement of policy EC-56 to foster sustainable coastal management along its coasts. - Policy EC-24: Increase required buffer distances around watercourses and wetlands contiguous with a watercourse - What criteria will this be based on? - EC-6 The addition of a creative new mechanism that will allow private landowners to protect a portion of their lands for conservation (previously not possible due to subdivision restrictions), provides a new and valuable tool for advancing conservation within priority natural areas in the Municipality. The wording should be amended to also include the option of selling those remainder lands or donating them through a bequest, to provide the greatest flexibility and likelihood of conservation success. - EC-56 coastal management approach - This is an excellent initiative and should be fast-tracked and not wait for the provincial Coastal Protection Act to proceed. - EC-61 on coastal ecosystems - 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. - While the plan mentions limiting development on islands prone to hazards, development on islands should also be limited based on priority ecological features and benefits. Where islands support unique ecological features and ecosystems, are essential refuges for many nesting, overwintering and migratory birds, consideration should be given to further conservation-science-based study on coastal islands and the appropriateness of development. - Support policy EC-38 to co-operate with external stakeholders and various levels of government. However, this policy should be expanded on not only to develop policies	
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		and programs to reduce greenhouse gas emissions, but to adapt to climate change as well. - Suggest stronger language for EC-18, EC-31, EC-41, EC-58 (ie, use "shall", "shall require", "shall define coastal setbacks") - EC-74 – specify Level 2 or 3 chargers in the 20% of EV ready parking stalls. - Concern about "should" vs. "shall" language in environmental policies and noted compliance/education is needed for new owners of waterfront properties so that they do not unknowingly remove buffer vegetation. - Specific Policy wording suggestions from Ecology Action Centre to EC-5, EC-6, EC-7, EC-8, EC-9, EC-11, EC-13, EC-14, EC-17, EC-61, and EC-70 - 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. - Policy EP-6 should say shall instead of shall consider. - EC-7 modified as: "The Municipality will strategically identify and acquire land for conservation purposes." - EC-8 – strengthen from "shall consider refining" to "will refine." - EC-18 - strengthen the language from "shall consider developing" to "will develop," and add Indigenous ways of knowing to list of considerations - EC-35 – change "Wetland protection strategies may include" to shall. - Policy specific wording suggestions for Objectives, EC-8, EC-11, EC-12, EC-13, EC-15, EC-18, EC-19, EC-21, EC-22, EC-23, EC-25, EC-26, EC-27, EC-28, EC-29, EC-30, EC-31, EC-32, EC-33, EC-34, EC-35, EC-40, EC-41, EC-42, EC-43, EC-44, EC-45, EC-48, EC-52, EC-61, EC-62, EC-63, EC-65, EC-66, EC-75, EC-76 - Comments on adding blue green algae action plan to 6.4; changing EC-18 phrasing to shall. - Environment should be more thoroughly integrated throughout the policies of the rest of the plan, offered suggestions for sections to include new phrasing. - Change "shall be considered" or "may be considered" to "shall" for majority of policies in Chapter 6. - Specific comments on sentence wording and definition of terms for meaning and consistency. Specific comments on changes and wording to sections 6.4.1; 6.4.3; 6.4.4; 6.4.5; 6.4.6; EC-24 to EC 27, EC 28 to EC 31. Critique of approach and language used.	
Chapter 7: Mobility	General Comments	- Consider policy specific to Windsor St Exchange initiatives due to its port transport orientation. - Support for statement that transportation and land use planning are inseparable, and the decision-making process for both must be integrated.	There is a need to clearly identify that the municipality will invest in mobility infrastructure as the region grows. The Regional Plan will be revised to identify that mobility infrastructure will be a significant component of the Strategic Growth and Infrastructure Priority Plan.

		- The transportation model is shortsighted. Not fully leveraging the coming revolution in e-car-bikes/e-rickshaws/electric three wheelers will severely hurt the affordability of transportation for our population and stagnate progress on climate goals. - A "Towards Zero" approach is unacceptable given the current state of pedestrian safety in the city. An aggressive Vision Zero must be implemented in the Regional Plan, given that it is the guiding planning document going forward. - HRM planning documents should start with a focus on how proposed changes impact people as pedestrians; the vulnerable road users—people who are cyclists or users of other micro-mobility devices and wheeled assistive devices; then transit users' trips fully, including attention to the "first mile-last mile" portions of users trips; then shared licensed vehicle trips—taxis, ubers, minivans, car pools, carshare fleets; and finally private vehicles, most often single occupancy. - Review opportunities to speak to Nova Scotia's Accessibility Act throughout this chapter. - Extend Pedestrian First approach to private land development permits, i.e., shopping centre parking lots, big box stores, etc. - Recommend adopting and using universal design principles into their public transit plans. - 5 year transportation reserves is not long enough - Some comments felt the plan was biased against car travel, which most residents use - Exercise caution in how large and where traffic circles are placed. They do not foster community living or community building unless they are designed with this in mind.	Reference to the Accessibility Strategy approved by Regional Council in May 2021 will be strengthened in the updated Draft (notably in relation to street design, bus stop accessibility, parking, and curb cuts). The Culture and Heritage Priority Plan proposes to develop an equity lens for transit, active transportation and transportation planning that enhances access to geographically marginalized cultural and heritage sites.
	Public Transit	- Comments include support for improved public transit frequency and geographical coverage for ferries and buses. - Comments include support for prioritizing non-car transit modes. - Comments include interest in commuter rail and light rail transit. Possible areas for connection included Truro, the Airport, Windsor Junction, Dartmouth, Bedford, and Halifax Peninsula. - Comments include support for transit priority lanes through bottlenecks and other busy routes. - Importance of good active transportation connections to transit terminals with safe bike parking. - Would like to see free public transit / and lower fees. - Importance of transit stops being accessible – all bus stops should connect to a sidewalk. - Be aware of accessibility to bus stops – bus stops near me are all up large hills that I can't comfortably walk up. - Importance of recruiting more transit operators to improve the system.	Staff will review comments as part of revisions to the Plan, and provide comments to Halifax Transit.

		- Buses are overcrowded, do not run on time. Buses need to be a viable option compared to driving in terms of how long it takes to arrive to your destination. - Park and Ride defeats purpose of transit as you need a car to get to them, locate them in more convenient areas to access - Any thoughts to upgrading existing HRM facilities to include end-of-trip bicycle facilities like bike parking, change rooms and showers? - When not subjecting transit facilities to zoning requirements, do so carefully – i.e., careful that this is not to enable large park and rides lots in residential areas, but rather to allow right-sized BRT stations at all scales. - Buses should come in all sizes – sometimes smaller buses with only 15 or 20 passenger capacity is enough. - Would like a bus to beaches, wilderness areas. - Creating transit systems that can connect people to hiking trails and beaches without relying on personal vehicles is important to reduce pollution and to promote active transportation for the city. - Provide direct transportation routes between all downtown areas (ie, community hubs). priorities should be given to all but single occupancy cars. Direct transportation routes may mean combining existing routes that are not direct, rather than building new ones. - Make riding public transit a more enjoyable experience. A lot of this is psychology to choose better among same or similar cost options. For example, make buses more colourful on the inside, and have some more facing seating for potential interactions. There could be better route names - Long term plans shall be developed for future Transit plans encompassing the entire Municipality. This Plan shall consider 100 year time frames. - No one wants to stand at a bus stop, they prefer private vehicles. - Transit tickets should be available for sale at the airport.	
	Specific area public transit comments	- Bring back the 178 Express Route. - Bus only lane on Oxford would be good, Quinpool Rd has too much parking. - Need for transit priority lanes in Burnside and Village on Main. - More transit options in and out of East Preston. - Would like more buses in Tantallon. - Clayton Park to Burnside connection would be good. - Buses are infrequent in Beaver Bank. - Traffic between Halifax and Dartmouth will need strong transit service to accommodate the growth in population. - A simple bus route from Spryfield to Burnside is desirable. - Williamswood neighbourhood would like a bus route again as the area is growing. - Transit between Spryfield and Bayers Lake is challenging.	Staff will provide comments to Halifax Transit for consideration.

		- Bussing to the hospital from some areas is challenging. - Herring Cove Rd needs more frequent transit. - The Riders Guide bus route map is very complicated and confusing, especially to newcomers and tourists. There are so many different bus routes all on the same street! - Transit to Bayers lake from anywhere is challenging, what about access to the new hospital there? - HRM's proposal for rapid transit in the Herring Cove Rd (HCR) corridor through Spryfield can't come soon enough. HCR and linked arterials need better, connected and continuous sidewalks and bikeways. - Bus stops along Larry Uteck need to be seriously upgraded. - Better bus service is needed to the Dartmouth General from surrounding Dartmouth neighbourhoods - Direct bus service that serves all of Main Street is needed. - Dartmouth East to Burnside connection is needed. - The Urban Transit Service boundary and Community Mobility Network should be revised on Map 7 to include Lucasville Rd. - Need for more parking at the Sackville Transit Terminal. We should build more local terminals with parking to encourage more people to park and ride.	
	Bus Rapid Transit (BRT) Corridors	- Comments expressing high interest in and support for bus rapid transit. - We need fast ferries sooner. - Integrate active transportation transfers into BRT. Consider bike storage and expand the walkshed around the BRT stops for active transportation users such as cyclists. - Have a micromobility / cycle-rental facility right on the bus terminal to increase the walkshed around BRT stops and include e-bike charging stations. - Interest in BRT lines eventually becoming LRT routes. Future infrastructure improvements to the MacKay Bridge should include room for a LRT to cross. - Distance Criteria to determine walksheds is unclear. - Halifax is making a lot of good steps, but things should be taken further. The rapid transit plan is a great first step, especially the fast ferries, but even more work needs to be put in place to ensure rapid transit all around Halifax. - Supportive of focusing on the connection between housing and transit. - Support for more housing along the bus routes. - Don't displace people from their homes to build the BRT lines. - Support for enhanced (bike friendly) BRT stations. - Need to increase the number of transit staff to make BRT possible. <i>Suggestions on ways to improve the proposed BRT routes:</i>	Comments will be provided to Halifax Transit.

		- Mills Cove Ferry Terminal will need a full AT review of the area. There is an illegal rail crossing that is the primary way residents reach the Bedford Waterfront and trail which needs to receive similar treatment to the AT rail crossing in Dartmouth. - Ferry and terminal do not need to be large and fancy (this will lead to charging higher fares) – you could make something very small to start and then size up as ridership grows. - BRT should extend to Bayers Lake future hospital. - Do you need the Larry Uteck Ferry? There is not a lot of available land there. Maybe Mill Cove is enough. The Rapid Transit Strategy doesn't give a lot of rationale for the Larry Uteck Ferry. - BRT should extend to Bedford Ferry. - Areas in Dartmouth are not connected to the BRT line: M district lands should be recognized as part of future transit-oriented communities and should have a BRT connection; Village on Main. - The BRT routes do not address the challenge of getting from Halifax peninsula to Bayers Lake commercial area. - Need for the Larry Uteck ferry to connect to a frequent local bus or have a park and ride. - Spryfield BRT route should extend down past Governor's Brook neighbourhood. - BRT should extend to Cole Harbour - Concerns about improving the road infrastructure for BRT between Cowie Hill and Chocolate Lake – there are cliffs and difficult conditions to contend with. - The Rapid Transit lines need to go farther to try and remove more traffic from Hering Cove and Purcell Cove Roads. - Purcells Cove or Herring Cove Ferry Terminal. - Larry Uteck needs upgraded AT infrastructure to connect the Bedford West communities to the proposed Larry Uteck Purple Line Terminal. - Sackville should have a BRT line.	
	Active Transportation	- Comments include support for and interest in expanding the active transportation network further, especially with protected bike infrastructure. - Support for more protected cycling lanes and multi-use paths. Do it strategically as part of upzoning areas. - People are scared to cycle, give them reasons not to be. Build bike infrastructure and they will come. - Bike lanes protected with bollards are best as drivers cannot ignore them. - Urban and suburban bike lanes are discontinuous and interrupted where cars must make right turns, could there be traffic lights for bikes? Cars pass too close to cyclists. - Concerns around trees being cut down for bike lanes.	Staff will review comments as part of revisions to the Plan, and supply comments to Active Transportation and Transportation Planning.

		- Bike lanes have been put on streets that are too narrow, making it difficult to drive. - Bike lanes need to be connected or no one will use them. - Bring in international consultants to help with a 50 year cycling network plan. The IMP is not being implemented. - Bike lanes are a waste of money, buses are superior. - HRM should have a bike share program like Bixi in Montreal - Bike racks should be required at all trail heads and institutional uses like community buildings, rec halls, schools, etc. - Many comments expressing broad support for making walkability and active transportation the norm for all new developments. - Prioritizing non-car transit modes should be top priority for the city and the regional / suburban plan to address immediately. - Comments include support for a protected active transportation network with physical barriers between bike lanes, sidewalks, and vehicle lanes. - Support for focus on transit and active transportation / shift away from private vehicles. - Bikes and scooters shouldn't have to share the road with buses and cars. - Large support for public and active transportation infrastructure improvements to encourage active transportation use. - Importance of interconnection and marking of routes for commuting and recreation. - Walkability is an important factor for elderly, lower income people, community connection, personal safety, public health, ecological health. Walkability in all neighbourhoods, not just central high-income areas. If we don't do it we'll be left behind. - Support for 'third mode funding': New York City allocates 10% of total funding for motorized mobility and freeways, to Active Transportation. - Sidewalks are good for more than just walking – they support our environment and energy goals. - HRM has a backlog of sidewalk projects - requiring developers to construct or cost-share off-site sidewalks for the pedestrian trips they generate will help address this backlog faster. - 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. - Suburban all-season AAA bikeway connections to rapid transit would be good. - There is a large deficit in AT infrastructure for pedestrians. - HRM should work with other levels of government on active transportation infrastructure. - Key services like schools, grocery stores, should have good sidewalk access and trail access.	
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		- There needs to be more benches along sidewalks, trails, and especially at all transit stops. We have an aging demographic that needs these amenities. - AT should be fully funded on an on-going basis. HRM should adopt "Third Mode Funding Concept" as used in New York. - Active transportation is not well used as it squeezes out private vehicles and drives away business. - People who do not bike are paying for bike infrastructure, not supportive. - It can be challenging to cross the road when parked cars block view of oncoming traffic (<i>need for good pedestrian crossings</i>) - Halifax Cycling Coalition comment: This chapter should include AAAA networks as part of the essential community infrastructure. "AAA" should be expanded from all ages and abilities to an "AAAA networks". We're including the fourth "A" for "All season": in Halifax snow happens. Quality transit shelters and surrounding mode-shift enabling infrastructure are needed for equity, for promoting non-motor vehicle modes of travel for all sorts of trips.	
	Area-Specific Active Transportation Comments	- Crossing the 111 is very challenging with existing bike infrastructure. - Would like to see protected bike lanes on Quinpool, Chebucto, Connaught, Oxford, Agricola, and Herring Cove Roads. - Interest in Dartmouth East and North Active Transportation Plan. - Need for protected lanes on Dunbrack. - -Would like to see Mount Edward turned into bike thoroughfare (with ways for cars to easily get out and join Main and Portland or Cole Harbour Road). - On Quinpool Rd, take away some space from cars and give it to transit/cycling. - Redesign the Windsor/Cunard/Chebucto) and the Willow tree intersections to be roundabouts to better protect cyclists and pedestrians. - Does not like the bike lanes on Creighton because of reduced parking and vehicle maneuverability. - Dartmouth Crossing and Burnside, existing bike lanes should get protective concrete barriers to protect cyclists from the 70km/h traffic and not just flimsy plastic rods and small concrete bumps. - It's hard to bike in Sackville. - Are there plans to add a sidewalk to the portion of Hamilton Drive near Sackville Drive that does not have a sidewalk. - Kearney Lake Road needs a protected bike lane. - Need for AAA network to connect with Burnside and Village on Main. - Need a pleasant street to Windmill Road active transportation connector. - There should be more places on the Peninsula transit and active transportation only. - Tantallon needs sidewalks beyond Glengarry, people speed. - Fairview needs more sidewalks.	Staff will review comments as part of revisions to the Plan, and supply comments to Active Transportation and Transportation Planning.

		- There are few sidewalks serving the Harold T. Barrett Jr. High School in Beaver Bank, and no sidewalks serving the Kinsac School. - Need for protected active transportation on Herring Cove Road and pedestrian improvements. E.g. pedestrian access from residential communities adjacent to the road facilitated with staircases on the steep hills. - Many streets in Spryfield do not have sidewalks. - Spryfield to Bayers Lake protected active transportation trail. - Active transportation bridge across the arm. - Sidewalks along more of Herring Cove Rd. - Connectivity between Spryfield and the Peninsula is hard – walking is dangerous due to Rotary. - Lack of sidewalks on Dartmouth Road. - There needs to be marked crosswalks built along where side streets meet many places on both the Bedford Highway and Hammonds Plains Road. Especially where buses drop off children who then need to cross these busy roads to reach the side streets. - On Larry Uteck there are no sidewalks from Amesbury Gate to Broad Street which is very dangerous as many people walk along this roadway, many of which are students walking to and from school. - The municipality should work with the Province to create more AT over and under passes along the 102 and our other highways. - Asking for sidewalks on Hillsboro Dr. - Need pedestrian access over or under the 102. - Construct the Lucasville Greenway. - Look to purchase of the Hantsport Railway for an AT trail from Windsor Junction to Mount Uniacke. By having this line in HRM ownership, it preserves the Right-of-Way for an Active Transportation Trail and perhaps one day in the future as a Railway. - Spryfield needs BRT and active transit infrastructure sooner rather than later. Our community is growing fast and while many amenities are within very reasonable distances, I do not feel safe reaching them by biking on Herring Cove Road. Traffic is already a big problem during rush hour and will only get worse as our community grows. - Why isn't Mainland South targeted for a priority project for an Active Transportation network? It is a main conduit for residents to the downtown core and desperately needs solutions to the traffic bottleneck from Herring Cove Road to the Armdale Roundabout. The old Active Transportation plan included maps and goals for the area, but absolutely nothing has been done to advance the goals in the ATP for our area. - Lights needed through Coronation Park, speed control bumps on the street, more police presence. - Need for trees, sidewalks, bike lanes on Dutch Village Road. What is the status of the Dutch Village Road streetscaping project?	
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	Trails	- Often a siloed approach in HRM with respect to active transportation trails vs Parks & Recreation trails in parks or neighbourhoods. All plans that are approved going forward should include a well-built trail, by developers, with wayfinding & signage as promoted by the Halifax Green Network Plan to encourage connectivity between AT and recreation. - Create a Committee for recreation and active transportation trails for construction and maintenance. - There is very little support for trails in the draft Plan; we recommend combining the management of recreation trails with the AT network. - Poor connectivity, signage, nature interpretation signage, and wayfinding on our local trails and showing people how to reach our local trails. We need to show people how to reach trail heads and clearly mark trail heads. - HRM should offer training courses for new volunteers who want to get involved with trails in both trail maintenance skills as well as administrative skills such as how to write for grants, RFP's, and next steps. - We should include policies that puts more pressure on the HRM recreation department to communicate with the trail organizations. - New developments should be integrated with existing trail systems. - How will Bedford Ferry Terminal connect to the old coach trail. - There is a section of the service road, which is used as an active transportation connector by residents, behind 49 Friesian Court. If this was maintained and fixed it would create a great connection between Larry Uteck and the Clayton Park trail systems. - All new developments should contribute to the Capital Cost Contribution to help fund and build AT trails. - Do not support the use of motorized vehicles for regular use on multi-use trails. - The trails that are discussed are mostly municipal trails. There are many trails in HRM that are entirely on provincial land or almost so, such as The Bluff Wilderness Hiking Trail. These trails are supported by both levels of government, and the RP should be worded, however gently, to reflect this positive cooperation on which the overall interconnected trail system depends. - When is the multi-use trail from Woodside to Shearwater coming? That is surely a prime IMP project. - The existing rail to trail network (Salt marsh, Shearwater, Rum runners, etc) need to be kept on HRM radar (i.e., don't rely solely on volunteer organizations). - Revitalize HARTA as a committee of Council to ensure Council is understanding the importance of trail systems and the current issues trail societies are dealing with.	Staff will review comments as part of revisions to the Plan.

	Rural Transit & Transportation	- Many comments expressing interest in expanded rural public transit. - Rural areas need safe active transportation lanes/routes as well, not just the urban core. - Strong interest in sidewalks for some rural communities, specific examples given of Musquodoboit Harbour, Peggy's Cove area, Hubbards, Upper Tantallon. - Paths connecting rural areas are good and don't necessarily have to be along the road. - Expand the rural transit funding program to improve rural mobility options including rural express transit and park and rides. - Park and rides are good for taking cars off the road, but can be completely inaccessible to non-drivers, many of whom are lower income or come from equity seeking groups. Consider changing phrasing from 'park and rides' to 'pedestrian accessible' park and rides to make a world of difference for more vulnerable rural Haligonians. - Having safe roads in rural areas is important. - Rural bike tours could be a way to increase tourism. - I would suggest that in rural areas in HRM, where certain roadways are major transportation corridors, consideration needs to be given to expanding these roads. Not only would this help with mobility of people and goods, but also would ensure that emergency resources are able to access these rural settings, possibly without having to build a great number of new access roads which would have environmental impacts (one of the considerations mentioned in the Plan). In addition, by ensuring that traffic is not idling in congestion, emissions would be reduced, helping to achieve climate targets in other ways. <i>Area Specific</i> - Musquodoboit Harbour has a need for more rural sidewalks and transit. - Areas in Upper Tantallon where there is no way for children to walk to the nearest shop – lack of sidewalks. - MusGo Rider's demand-responsive paratransit is well used and highly valued. Asked whether a once-a-day bus to Halifax is still needed, the answer was Yes, especially for students who want to remain in the community while studying in Halifax. - Pedestrian and bicycle access is needed to the Fall River Park and Ride. It is currently only safely accessible by vehicle. - Would like to see transit service in Windsor Junction. Rural express service is desired, and would help commuters. Sidewalks along main routes would also help to access bus stops.	Staff will review comments as part of revisions to the Plan. Comments will be considered as part of the Rural Community Planning program.
	Parking Requirements	- Many comments of support for removing parking minimums in commercial developments. - Eliminate free parking downtown once transit network becomes more accessible and usable.	Staff will review comments as part of revisions to the Plan.

		- Would like to see more parking downtown. - Consider adding green infrastructure (eg, street trees) as one of the other priorities to on-street parking. - Suggest a dedicated Rural Mobility Hub program with funding for rural mobility hubs with bus shelters and EV chargers, design guidelines, ongoing evaluation. - Concern that Downtown Halifax is not accessible because of the cost and lack of parking. - Providing a parking max is not a good idea because it would tend to have people who own cars move to more suburban and rural areas. Preference is for neither parking mins or maxes. - Support for less surface parking, would like the language in this section to be mandatory.	
	Traffic	- Consideration must be given to identifying metrics for acceptable, and maximum congestion permissible for achieving the goal of an enjoyable lifestyle for HRM residents. - Many comments expressing general concerns about the rate of development and the level of traffic causing problems. - Need for traffic calming in many areas. - Mobility sharing needs to be incentivized in suburban areas. - Many comments on need to link new growth with infrastructure investments to improve traffic congestion and safety. Some areas are seeing growth without infrastructure upgrades and traffic has become a large issue. - Drive-throughs should be banned. They impact traffic and are bad for the environment and pedestrian realm. - Support continuing to lower speed limits throughout the Municipality. - Efficiently moving people on and off the peninsula should be a major focus.	Staff will review comments as part of revisions to the Plan. Managing congestion is a principle of the Integrated Mobility Plan. Investing in the mobility network is a key component of the IMP program and will be important for the Strategic Growth and Infrastructure Priority Plan.
	Area-Specific Traffic Comments	- Many comments regarding specific intersections and areas, particularly Sackville, and Beaverbank, Hammonds Plains, River Lakes, Armdale Roundabout, Spryfield. - Several comments regarding Hammonds Plains Road having high traffic levels, need for increased infrastructure. - Communities of Sackville, Beaverbank, and River Lakes area need better routes to commute. - Interest in Margeson Drive Extension to Beaverbank and Aerotech connector - Concerns that Margeson Drive extension would direct truck traffic into existing residential area. - Beaverbank road cannot handle current traffic load. - Concern about Anchor Drive / Purcell's Cove Road traffic volume.	Managing congestion is a principle of the Integrated Mobility Plan. Investing in the mobility network is a key component of the IMP program and will be important for the Strategic Growth and Infrastructure Priority Plan.

		- Several comments regarding the Armdale Roundabout being unsafe, confusing, very congested during peak hours. - Need a stop sign at Mic Mac Drive / Waverly Road. - Hammonds Plains Road should be widened to four lanes all the way from exit 5 to Bedford. - Timberlea Parkway needs traffic lights. - Sackville traffic/sidewalks concerns, safety and visibility. Need for more crosswalks. - Beaverbank traffic is excessive. - A few comments on the need to build a collector road through Shearwater to handle additional traffic. - Hammonds Plains Road is very busy. As we grow, roads must grow too. - Suggestion for reversible lanes on Herring Cove Road (similar to lanes right before the Armdale Roundabout) that could better accommodate traffic flow in the AM vs. PM. - Highway 2 is like a racetrack, speed is an issue. - Highway 102 at Sackville has many near misses. - Concern that the new airport connector road in Beaver Bank will lead to more growth. - Brunello Boulevard needs traffic calming. - When are we finally going to get the Beaver Bank Bypass?! That bypass has been proposed since 1978. Will I still be alive when it finally gets built? Or, could we have a connection to Highway 102? Galloway was supposed to join Hwy. 102. There's so much development but you can't get to it. Sometimes the Beaver Bank Road is completely blocked by an accident. - Windsor St exchange is too busy. - Need traffic lights on Washmill Lake. - Shore Rd and Wardour needs speed humps and sidewalks. - The access should be opened for vehicles to travel from Basinview Drive to Shafflesburg Run. - HRM should find ways to ensure there is safer access to the Trunk no. 7 highway and all new access roads from abutting residential subdivisions. - The turning lanes/ramps at all 4 corners of Forest Hills Parkway, Cole Harbour Rd and Cumberland Dr intersection have been removed and turned into bike lanes. This creates long line ups at the lights as cars wait to turn right. Creates more emissions from idling cars. Is it possible to get some of the turning lanes put back?	
	Transportation Demand Management	- Reduced parking requirements where bike parking, car-share, and other TDM measures are provided is encouraging. - Adding Vehicle Kilometers Traveled (VKT) generation limits in Land Use By-Laws would integrate TDM into land use planning. California's SB 743 is an example in place	Staff will review comments as part of revisions to the Plan.

		since 2013. There are websites of case studies from Californian municipalities of all sizes. - Section 7.6 Transportation Demand Management, is not well detailed with limited space devoted to this. This is puzzling given the frequency that which population growth has been referenced elsewhere in the document. Transportation needs to not only be sustainable but also efficient and effective.	
	Complete Streets	<i>See the 'Area-Specific Traffic Comments' and 'Area-Specific Active Transportation Comments' sections for related comments.</i> - Considering parallel corridors in Complete Streets projects will recognize more impacts and opportunities, which is good. - Formal enabling policy for dedicating streets or portions of streets as car free zones is encouraging. - HRM is making too many 'stroads' and not enough streets. - Support for a Complete Streets approach to prioritize the movement of people using sustainable modes of transportation over vehicles. Investing in safe pedestrian and cycling infrastructure, exploring micromobility, and expanding our public transit system is crucial to building healthier, more climate resilient, complete communities and improving quality of life in HRM.	Staff will review comments as part of revisions to the Plan.
	Road Condition/ New Roads	- Roads are in bad condition. - Several comments expressing concern about speeding, would like speed limits lowered. - Need to use a higher-grade surface for the roads, ideal something that is less dark in colour to absorb less heat. - Support for building the Shearwater/Mount Hope Connector road. Enable infill residential development and connect the existing and planned development at either end; Create greater connections across this part of the municipality, including AT and possibly new transit routes; Provide better and more efficient routes and response times for emergency service (ambulances and transfer units). - Wants a bridge from Woodside over harbour to Herring Cove road. - Need to ensure connections between communities – subdivisions built along highways have no secondary routes between them. - Fix bridge – Musquodoboit Pier Bridge. - The business case for the Highway 107 Extension (Burnside Expressway) is unclear. - Do not support Highway 113 as a part of any development considering conservation and wildlife corridors work.	Investing in the mobility network is a key component of the IMP program and will be important for the Strategic Growth and Infrastructure Priority Plan. The Province builds and maintains 100-series highways.

	Curbside management	- Prioritizing accessible curbside parking is good but if curb cuts and buffers to enable driver-side, passenger-side, and rear-loading access for wheelchair users is not provided then the space is not truly accessible. - I support the detailed planning presented in this section for solutions to the growing demand for the parking of motor vehicles. However, the environmental impact of parking lots should be given due consideration. Sub-surface storm water collection that allows ground water recharge -filtration and drainage to naturalized detention/ retention ponds should be used, including oil grit separators. As well, tree plantings for water uptake and cooling effect are very important. Rain water gardens could be considered.	Staff will review comments as part of revisions to the Plan. Reference to the Accessibility Strategy approved by Regional Council in May 2021 will be strengthened in the updated Draft (notably in relation to street design, bus stop accessibility, parking, and curb cuts).
	Mode Share / Integrated Mobility Plan (IMP)	- I like the new mode share targets. Make sure that the public, and staff for that matter, understand the emphasis on non-auto trips and what type of modal shift that requires to achieve the goal. - Several comments expressing that the transportation mode share goals are unrealistic and set transit targets that even pre-pandemic Toronto was not able to meet. We need more realistic mode share targets, "A realistic plan should have realistic goals." - HRM needs to reconcile their climate goals and their mode share targets. How can we reduce by 2030 our mobility-generated greenhouse gas emissions to half of 2009 levels while projecting that 65A% of trips in the municipality will be done by private vehicles while the population increases 2% a year? - Some areas of the municipality will be less likely than others to get out of cars and take public transit. - We need a culture shift towards pedestrians and transit. - 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. - Recommend an update to the IMP as it is quite dated and there have been many changes. - Apply a gender and equity lens and adapt CUTA recommendations to address root causes of violence. - The 2031 target of reducing the percentage of "private drive" to work from 82% to 65% therefore is impossible unless HRM is planning a massive Road Tax and an Urban Core vehicle entry tax to get people out of the downtown...The author of this section is quite frankly strongly biased against private vehicular transport as the report later on describes auto dealerships as an "obnoxious use of property". - A big audacious policy idea I'd like to submit is to increase the bridge tolls and direct that to transit and active transportation projects (the flyover?). I'm not quite suggesting congestion pricing, but clearly the demand for personal car transport over the bridges at peak times exceeds capacity. I think Uber has the best idea here (surge pricing): charge more to cross the bridges at peak times to fund where we want to go as a city.	Staff will review comments as part of revisions to the Plan.

		Based on HHB's 2019 data, there are 100,000+ work-day crossings a day; a small increase would go a very long way.	
	Regional Transportation and Joint Regional Transportation Agency (JRTA)	- Good to consider opportunities for improving regional and inter-regional passenger services of all modes. - 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. - Request that the Province of Nova Scotia gift ownership of the rail corridor within HRM to HRM for the economic prosperity of healthy & complete communities.	Staff will review comments as part of revisions to the Plan.
	Egress / Second Exit	- Comments include support for second egress routes and emergency access routes across HRM. - Don't build more developments with only one exit. - The lack of back exits in the 2023 wildfires meant that some communities were completely trapped. - Adding backroads will enable more housing – consider how to enable emergency access without unintentionally inducing more development in areas. - Pace the density with access. As traffic increases ahead of infrastructure improvement there are challenges. <i>Area Specific</i> - Westwood had no back exit during the fires, they want a second exit to Upper Hammonds Plains. - Rethink Spryfield emergency exit – only 2 routes in and out. - Indigo Shores has only one exit, the latest phase of Springfield lakes have only one exit. - Governor's Brook has 2 exits but both on the same side. - Governors Brook extension needs another egress. Its roads are not wide enough to accommodate on-street parking, so allow bigger lots with larger driveways. Not enough room for emergency vehicles. - More emergency access! Lucasville, Beaver Bank, Upper Hammonds Plains... - Concern that recent Beaverbank developments do not have enough access. - Beaver Bank road developments need more access.	Staff will revise the plan to further emphasize emergency planning, including emergency egress. Planning & Development will work with Community Safety and Halifax Regional Fire & Emergency on these revisions.
	Design Guidelines (Red Book)	- The Municipal Design Guidelines were just updated in 2021, but ongoing updates are needed. "reviewed from time to time" is vague, but defining a frequency for updating	Comments will be reviewed as part of updates to the Red Book Municipal Design Guidelines.

		Municipal Design Standards might be too restrictive and delay adding lessons as they're learned. - Concerns about street trees being cut down as roads get redesigned. - The change from 8% max slope to 6% max slope in the red book for minor collectors has meant that there is more need for blasting, removal of forests, and longer roads, less land for housing. Consider the balance between accessibility benefit of low slope and costs including environmental damage/cost/area for roads associated with the lower slope requirement.	
	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.	Staff will review comments as part of revisions to the Plan.
	Goods Movement	- Leveraging available technologies to enable shifting more types of container movement towards rail will hopefully reduce freight traffic and emissions through Downtown. - Any intensification of port related activities on underutilized land in Woodside should require a community benefit agreement; this may be a way of funding connections between the Regional Centre AAA Bikeway Network, Eastern Passage, and the Shearwater Flyer Trail. - Considering the spatial needs of trucks in Complete Street projects on designated truck routes is a good thing to codify.	Staff will review comments as part of revisions to the Plan.
	Policy-Specific Comments	- Section 7.11 on EVs saying "Investing in sustainable modes and Complete Communities must play a significant role in tackling transportation emissions, safety risk, household costs and land consumption" – where is the related policy guidance to carry this out? - Would like language of M-3, M-6, M-7, M-13, M-15, M-16, M-17, M-18, M-19, M-24, M-26, M-27, M-30, M-32 changed to 'shall' and re-written to reflect mandatory direction. - Consider explicitly including Active Transportation to M-16. - M-16 could propose retrofits for accessibility standards, as per IMP. - Consider adding policy on minimum setbacks from freeways and rail lines that (a) have child care facilities, schools and parks avoid locations on arterial roads, highways and high volume roads; and (b) consider creating fresh air intake guidelines for all site plan applications. See Ottawa as example of best practices. - M-26 – consider broadening to "equitable access for <u>all underserved</u> communities". - M-42 should only apply in Regional Centre or in proposed Rapid Transit Oriented Development areas. Uniformly limiting parking will make it harder to achieve building occupancy in cost-effective manner.	Staff will review comments as part of revisions to the Plan.

		- M-5 (k) - changing “including” to “including but not limited to,” as well as specifically mentioning the newcomer population. - M-48 – add bullet points on (a) linking access to transportation and poverty through an equity lens; and (b) Collecting data and metrics of current ridership needs and routes, including a gender lens, to better understand how people who identify as women and transit interact and the barriers currently experienced by those who identify as women. - Goals M13 to M17 do not provide any meaningful information on how the above will be achieved. - 7.5.2 Goal “using a “Towards Zero” approach to injuries and fatalities for street safety and security” is another open cheque where a mandate will be given to staff to write their own rules. M18 to M22 are continuing a very bad approach to planning. - M-43 Not supportive of reducing or limiting parking – this will just make us rely on Amazon delivery from Toronto. Further, auto dealerships and warehouses are not obnoxious uses. - M-40 Just increasing funding for community-based transit systems is insufficient as these systems rely on the efforts of volunteers, who do not have the time or expertise to design or deliver an effective system.	
Chapter 8 – Economic Prosperity	General comments	- What are the ways the Municipality ensures communities are healthy and complete when it comes to the private retail sector and what businesses come into a community? - Encouraged to see language of equity woven into the economic development chapter. - 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. - 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. - Commend engagement with African Nova Scotian Communities – expand to include youth, newcomers and Indigenous communities. - consider a by-law limiting square footage of business and buildings in any industrial lands to 50% of square footage in downtowns so as to over come the hollowing out of our downtowns and keeping business in our downtowns viable. - HRM needs to approve permits faster to address needs of the business sector e.g. commercial and industrial development. - This chapter does not have any plan, as the municipality has no jurisdiction over the provincial or federal government. There is a strategy to provide land on municipal lands. That is all this chapter offers. There is no mention of any tangible job creation from the private sector. - HRM needs to focus on lowering the cost of public services, the needs of the business sector (faster approvals of commercial and industrial development), reduce the cost of	Staff will review comments as part of revisions to the Plan.

		running a business in HRM, improve the business climate or the goals on GDP growth will not materialize.	
	Mixed use Communities	<i>Many comments about mixed use communities also relate to Chapter 2 - Complete Communities, Suburban Community Planning; see those sections for further context and detail.</i> - Comments include support for allowing light commercial and residential together to create more mixed-use neighbourhoods everywhere across HRM. - Would like to see more explicit requirements in the Regional Plan for mixed-use zoning and the creation of walkable neighbourhoods. - Allowing commercial uses in low-density residential neighbourhoods is preferable to building big shopping centres. - Local shops and services are important. Different communities could specialize in different types of stores, for example, ethnic food and ingredients. - HRM should allow more residential development near new health centre in Bayers Lake - Increasing access to services is important, but equally need to look at protecting community health by restricting or reducing the availability and access to unhealthy commodities, activities, or services. - Create more city "squares". These are generally open areas with some amenities where people can gather while feeling safe due to open sight lines and others around them. Shops could be around some or all sides of the square. Have some places to sit on and activity inducing features like hopscotch or racing track lanes on the ground, with a playground for kids in some squares. Many ideas can be taken from the current HRM waterfronts.	Staff will review comments as part of revisions to the Plan, and supply comments to the Suburban Community Planning program.
	African Nova Scotian Community Planning	- Encouraged to see support for Community Benefit Agreements. Would like to see CBA negotiations codified by municipal legislation. - Community Action Plans are an important step to redress historic harms done to the ANS community.	An African Nova Scotian Community Action Planning team with dedicated HRM staff will work with ANS Communities to move forward the actions outlined in this policy.
	Institutional Partners	- Comment from Dalhousie University with questions on intent and implementation of policies EP-2 and EP-3. Dalhousie does not support including 'mitigating neighbourhood impacts' in Regional Plan policy. - More direction on noise mitigation efforts HRM wants near Shearwater. - Why are commercial and private sectors not included here?	Staff will review comments as part of revisions to the Plan.
	Industrial policies	- Retain industrial zoning in Eastern Passage. Use the land to attract high end aerospace industries (eg, NASA) - Eastern Passage industrial sites would be better used for residential.	Staff will review comments as part of revisions to the Plan.

		- The container piers by Windsor St and Point Pleasant should be moved to an area like Cow Bay to reduce traffic and open up the train tracks for a commuter train. - The train tracks are spoiling great downtown development opportunity in Dartmouth. Consider moving train station and tracks -this has been done in other cities (Edmonton as example). - Need to increase our focus/productivity for local manufacturing of goods, instead of having things shipped in from overseas. - Concern that as the suburbs redevelop and expand, industrial uses will be pushed further out towards rural communities. Feeling that industrial development is not held to a high standard for buffering and aesthetics. In Prospect in particular, this means that the main route to/from their communities is unattractive and does not feel safe. - Concern about the aesthetic and environmental impact of the expansion of the Ragged Lake Industrial Park. - Cannabis policies should be here, not under Food Security - Do not build more industrial parks. The ones in existence are enough to handle future entities that might need to be in an industrial park. - Comment from Prospect area: Our residential communities are concerned about continued industrial creep and expansion of the urban service boundary into residential communities.	Comments related to the potential Ragged Lake industrial park expansion will be shared with the Planned Growth team (P&D) and Corporate Real Estate.
	Green Economy	- 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. - Introduce a liming program for low PH impacted watercourses. - Maintain and increase the Urban Forestry Program throughout the Municipality. - Concerns for a Green Economy, that there is a need to better utilize existing resources - Concerns about HRM's Climate Action Tax.	Staff will review comments as part of revisions to the Plan.
	Tourism and Rural Tourism	- Nature-based activities in urban area offer opportunities for residents and visitors (eco tourism) to connect with the natural world, promote physical and mental well-being, and foster a greater appreciation for the environment. These activities help create more sustainable and livable cities. - Rural economic development should be under a sub-agency of Develop Nova Scotia, like the old Regional Development Agencies (RDAs). - Glad to see support for underrepresented communities in joining growing tourism industry. Property transfers would offer these communities more self-determination. - HRM should work with the Province to increase fishing related tourism. - Work with other levels of government to develop a HRM wide Park Tourism Plan similar to what is being done for new roads.	Staff will review comments as part of revisions to the Plan, and supply comments to the rural community planning program.

		- Increase the number of Conservation parks for tourism (e.g. Sandy Lake, Freely Lakes, Anderson Lake and Beaver Bank Lake) and develop trails with natural and historical significance. - Internet is poor in Middle Musquodoboit and cell access is absent at the edges, same in Tantallon.	
	Water Lots	- Water lot infilling itself must be regulated and restricted. There are multiple stages in a water lot infill and development where enforcement of specific uses is not occurring and not feasible to constantly monitor. Unequivocally restrict infilling activities within water lots, 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". - infilling of water lots along the Northwest Arm and the Harbour is a travesty and was never intended for that purpose. We understand this is a jurisdictional problem but what can be done? - Comments expressing support for preventing Harbour infill in Dartmouth Cove.	On November 14, 2023 , Regional Council directed staff to initiate a process to consider amendments to the Regional Centre Secondary Municipal Planning Strategy, the Halifax Municipal Planning Strategy, the Regional Centre Land Use By-law, and the Halifax Mainland Land Use By-law to restrict water lot infilling on the Northwest Arm. Regional Council further requested Request that staff engage with the Federal government to explore the Minister's willingness to adopt or otherwise permit further restrictions with respect to infilling in Dartmouth Cove and prepare a supplemental staff report regarding the initiation of by-law amendments to the Regional Centre Secondary Municipal Planning Strategy to restrict water lot in filling in Dartmouth Cove.
	Policy-Specific Comments	- EP-6 on small scale commercial & home based businesses – would this be implemented via DA like Centre Plan? Prefer a simpler approach to support these "Third Places." - Move 4.7.5 Cannabis to EP Industrial policies. - Policy wording suggestions for EP-1, EP-17, EP-22, EP-28, EP-37. - Add to EP-28 direction to work with community and stakeholders to increase the tourism focus on urban parks and green spaces, wildlife observation, guided nature walks, biking on public trails, and water-based activities (i.e., canoeing, kayaking, fishing), etc. - EP-11 revise "map 6" to include the Sackville River – Sandy Lake Corridor. - Ep-17 add i) protecting wetlands, wildlife corridors, old growth/ mature tree stands, floodplains, watercourse and unique eco-systems - 8.4.5 Halifax Harbour: Add that Lawlors Island, Georges Island, Devils Island, McNabs Island, Admirals Cove, Wrights Cove, Bedford Basin islands (and other lands around the harbour existing in an undisturbed state since 1749) should be protected to recognize their natural and historical significance. Efforts should be made to preserve and protect the natural inter-tidal zone whenever and wherever possible.	Staff will review policy-specific comments provided when refining the Draft Regional Plan.
	General Comments	- Concerns that the community aspect of Beechville has gone because of new development.	Sharing Our Stories, HRM's Culture and Heritage Priority Plan (CHPP), has been developed as directed by the 2014

Chapter 9: Culture Arts and Heritage		- Would like to see more arts and cultural events in Sackville. - 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. - The arts are critical. "If Halifax wants to be a city of 1 million people and it doesn't have an arts policy – forget it!" - Recommend more public civic space for market, community gathering (like public square in Spain/Italy for market and gathering) - Moving away from a built environment and supports that caters to the nuclear family and implementing a lens of thinking about larger families' (intergenerational/cultural communities/friend gatherings) ability to informally and affordably gather together to enhance a sense of inclusion and community. - Build and support a Cultural Center in Middle Sackville (700 hundred seats). - Support local Heritage Society (e.g. Fort Sackville, Fultz House, Sackville Community Radio, Seaside Radio). - Support and fund Beaver Bank Society and Sackville Business Association as supporters of Canada Day, Natal Day and Winter Carnivals.	Regional Plan and it informs the Draft Regional Plan. It outlines a set of 44 actions relevant to this topic. It coordinates cultural and heritage initiatives across municipal business units, including investments and initiatives over the next 10 years. Engagement on the Plan focused on working with equity-seeking and underrepresented groups. Various actions relate to feedback received. CHPP Action 3.9 includes direction to complete a Cultural Facilities Plan to provide the municipality with a strategic, long-term approach to support, renew and invest in purpose-built venues that support professional arts and culture activities.
	Reconciliation	- Recommend that Mi'kmaq representatives or communities have final say over the development proposals and not simply get to participate in their assessment. - Would like an African Nova Scotian or Indigenous staff matter that can provide insight on planning matters. - The Draft Regional Plan does not appropriately address HRM's legal fiduciary duty of care and protection of the Indigenous Natural Indigenous Collective Community Human Rights to physical and cultural survival. This plan does not respond to anti-Indigenous racism issues, violations of territorial rights, and violations of human rights. The next iteration of this Regional Plan should address the Territorial Rights violations, & Human Rights violations that are associated with this territory of Mi'ma'ki being unceded territory. - Why isn't there an action plan for Historical Indigenous Nova Scotian community, or an Indigenous Road to Economic Prosperity plan? - 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? - Mi'kmaq communities make the final decision in the assessment of development proposals rather than "shall participate."	Action 2.5 of the CHPP directs HRM to "Develop a Friendship Accord with Mi'kmaq communities, organizations, Band Councils and Grand Council, to enhance communication, explore areas for collaboration, opportunities to develop joint projects, funding proposals and to outline the government-to-government relationship." Action 2.6 of the CHPP directs HRM to "Develop a corporate policy to outline Indigenous community engagement, collaboration, celebration and recognition protocols."

Celebrating diverse cultures and stories	- 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. - Great to see celebration Mi'kmaw names! - Would like to see a statue of Daniel Paul in the space where the Cornwallis statue was previously located. - Diversity policy for all other minorities - Objective 6: Much of the area around Kjiptuk 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. - Create more opportunities for citizens to make a difference and tell their stories People embrace, take ownership, and spread stories when they are somehow involved in it. For example, if they or a friend won a contest to design a bus now in service. Or perhaps they created something visible and admired in the neighbourhood through guerilla design. Create more of these opportunities.	CHPP Actions include scoping interpretation plans for important places.
Heritage Protection	- Would new heritage tools include amendments to the local Building Code? - Applaud the actions around maintenance and upgrades for Heritage Properties as they are in direct alignment with the goals of Chapter 6 and the municipality's ambitious climate targets. - Support to keep historical traditions and incorporate with the new. - Concerns about demolition of heritage buildings without salvage operation. - Concern about lack of heritage preservation in Fairview and Spryfield. - 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. - Great to see recognition of deconstruction and salvage, and energy efficiency retrofits. Much of the waste in the landfills comes from C&D materials. - Ensure stronger heritage protection and preservation – important for tourism. - Need to preserve and promote our history and heritage and need Council support to move faster on these projects (example Halifax Forum). We should be including signage and information panels at historic places and structures.	For details, refer to CHPP Action 1.2: Identify and conserve areas of historic and cultural significance in partnership with communities.
Archaeological resources	- Needs to be strong community collaboration regarding who contributes to and has access to archeological knowledge, how it's shared, and used.	CHPP Action 1.1: Explore the development of a regional archaeology strategy with the Province, Kwi'mu'kw Mawklusuaqn Negotiation Office (KMKNO), Band Councils from the region, African Nova Scotian communities and Acadian communities.

	Anti-Black Racism	- Support for increased D&I focus for culture and heritage.	CHPP Action 2.3: Consult stakeholders to determine community interests leading to the creation of a central and prominent space dedicated to African Nova Scotian history and culture.
	African Nova Scotian Community Action Planning	- Need more details on what it means to restore historic ANS communities.	HRM is starting this work as communities request it. Community Action Planning is underway in Beechville, and Upper Hammonds Plains is being initiated.
	Community Benefit Agreements	- Need more details on <i>Community Benefit Agreements</i> to ensure that they are truly a benefit for Mi'kmaw communities, not being used to acquire trade-offs for harmful development/industrial projects.	
	Policy-Specific Comments	- CH-17 on updating heritage evaluation criteria – this is overdue and very welcome. - CH-3 consider adding: "(d) Increased use of Mi'kmaq and Indigenous terms for inclusion on wayfinding/signage" (KJIPUKTUK (Halifax) Mi'kmaw Place Names. - CH-9 - enriching and encouraging multilingualism as a connection to culture.	Staff will review policy-specific comments provided when refining the Draft Regional Plan.
Chapter 10: Implementation	General Comments / Community Engagement	- Some comments indicate a perception that community consultation in HRM is not valuable as feedback is not always reflected in final plans and there is low follow-through with residents. - Eliminate this chapter and instead put an implementation concept in each of the other chapters including metrics for success. - Can't assume people know how to follow the planning process, there needs to be increased efforts to reach rental and low-income communities through consultation for developments. - Terms like 'missing middle' are jargon. - Make all planning documents a Grade 9.0 or lower Flesch-Kincaid readability level This is a standard used by some governments worldwide and can be determined in Microsoft Word. It concerns words and sentence length, not complexity of subject matter that would be harder to assess. However, it is an important factor to help with understanding text. - Several comments related to engagement approaches, including engagement materials (maps, language, writing style), who to engage, event locations, notification methods, etc. - Would like to see more continuous reviews and updates of the Regional Plan. - Request for Consideration must be given to making all mapping source data readily, & publicly available at no cost. In this manner, community volunteers with the appropriate skills can develop mapping products that will assist HRM staff & council in their decision making.	Staff will review comments as part of revisions to the Plan, and as terminology is clarified in the updated draft. The Municipality makes data available on its Open Data platform.

Secondary Municipal Planning Strategies & Priority Plans	- Encouraged by the language of community health and equity throughout the Regional Plan but would like to see those priorities directed towards Secondary Planning Strategies. - Establish a Healthy Communities working group to explore potential of creating a healthy communities priority plan.	This section to be revised to clarify intent.
Discretionary Applications	- Consider adding proximity to food retail outlets, and social impacts of proposed amendment or development application on the existing community. Use Social Impact Assessments and Health Equity Impact Assessment as tools. - Discretionary applications should consider existing and pending conservation areas, including Federal, Provincial, or Municipal parks and protected areas, lands cared for by the Mi'kmaw, and land trust and other non-government conservation lands.	Staff will review comments as part of revisions to the Plan.
Sites Supporting Affordable Housing Initiatives	- Support the leadership and partnership exhibited related to sites for affordable housing initiatives.	
Conservation Design Developments	- Good to have more detail on Conservation Design Developments but 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) - The challenge moving forward will be ensuring that environmental considerations are truly a foundational imperative and guiding pillar, rather than one of many planning considerations.	Staff will review comments as part of revisions to the Plan.
Special Planning Areas	- Not supportive of Section 10.3.4 regarding the Special Planning Areas - likely the Regional Plan will outlive the Provincial Special Planning Areas. Processes imposed upon HRM should not be acknowledged with special significance in the Regional Plan. - Strongly disagree with allowing early tree removal, blasting, and earthworks by development agreement if this means ground clearing before background studies are completed. - Special Planning Areas should not be excluded from the normal HRM Planning Development process. In the rush to expedite development the shortcuts such as early tree removal, blasting, earth works and other activities that HRM normally follows as part of an orderly development process will lead to sedimentation and water quality issues in the receiving watercourses. - This Housing Task Force issue should not be included in the draft HRM Regional Plan at all. Including this section in the city's RP appears to indicate HRM's support and acceptance of the Special Planning Areas (SPA) selected by the province, and therefore gives unstated support to the Task Force's goals and methods. The RP is long term and the Task Force was set up for a fixed time period (2 years?). We have	Sections related to Special Planning Areas are included in the Regional Plan as approved by the Minister of Housing and Municipal Affairs. Under the HRM Charter, any amendments to planning documents are subject to review by the Minister.

		been told its mandate should have run out before the long-term vision of the RP is put into place. - This draft was written before Bill 329 was proposed: Concern: Is this section an indicator that the Province has taken over housing for the long term (has not told citizens this yet)? - Concerns around Eisner Cove wetlands development as part of the Southdale/Mount Hope provincial special planning area.	
	Parkland dedication	- Do not support 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). With increased density (whether or not there is subdivision) increased access to green space is needed. - 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." - Parkland dedication should not be made available to sell to other interests, but retained within the existing neighbourhood to meet the needs of current and future residential growth. - Table 10.2 Park Classification System – Should Nature Parks also be listed and defined here? - Change RSBL section 82 to allow parkland dedication to include wetlands, natural or engineered. These wetlands would create a source of water for volunteer fire departments, could be used for walking on berms or skating in the winter, and help slow stormwater runoff.	The Draft Regional Plan policies represents an expansion from the 2014 Regional Plan policy and provision in the Regional Subdivision By-law, which permits a reduction to 5% for lots of all types. The Municipality does not have the ability under the HRM Charter to require parkland dedication based on density. The Park Classification system is established to support parkland dedication and acquisition through the subdivision process. This section may be further reviewed with support from Parks & Recreation staff.
	Water and Wastewater Service Area / Source Water Protection	- Support 100-metre buffer around water supply sources. Consider strengthening it by saying it may be relaxed only for <u>existing</u> privately owned properties. - Because HRM's plan is based around central sewage, and sewage goes into the Harbour, it is fundamentally flawed. Stop adding to the central sewer. - This is a great initiative, Ecology Action Centre supports the establishment of a Protected Water Supply Zone. - Need to extend urban service boundary and allow more density in suburban areas to really tackle housing crisis. HRM has not been supportive of this in the past. - Tomahawk Lake, designated as a Future Water Supply Area should be provided with fish passage facilities (both up and down stream) should any dam or water control structures be necessary. Not in favor of any diversion of water from Tomahawk Lake to another watershed. - HRM should carry out municipal wide ground waters studies, (not restricted to water drinking supplies).	The Protected Water Supply Zone is an existing zone applied to Municipal drinking water supply areas. Halifax Water manages Source Water Protection Plans for all drinking water supply areas.

	Measuring Success and Adapting to Change	- The Plan should incorporate a well-designed process to evaluate the effectiveness of its policies and regulations. One area of particular interest to us is the effect of wind levels on pedestrian comfort at street level. - Use a broad definition of a healthy community, stemming from the social determinants of health, to determine monitoring metrics for the Regional Plan. - Considering this plan isn't time bound, like past iterations of the Regional Plan, it is essential that specific, measurable, achievable, relevant, and time-bound (SMART) indicators are included and used by HRM to evaluate the effectiveness of policies and by-laws. - Support policy RP-17 and look forward to seeing updated population scenarios, growth scenarios, and ongoing monitoring. - Endorse policy I-59 for continued opportunities for public engagement in plan creation and review, however concerned with by-law language and recommend that that subsequent by-laws are written in such a way as to ensure that this Regional Plan can and will be implemented fully. - The plan must identify the actions to be taken, the sequence of actions to be executed, who is to take those actions, the timeline, the reason for taking those actions, along with the metrics for success.	Staff will review comments as part of revisions to the Plan and with consideration for strengthening policy language.
	Policy-Specific Comments	- Policy wording suggestions for I-7, I-9, I-10, I-11, I-12, I-43, I-44, I-52, I-57. - I-18 – parkland dedication should not be reduced. - I-20 A poor exception. Notwithstanding clauses are chilling. Yes, we need housing, but it sounds like environmental principles will not apply to these lands. It's a short-sighted policy. - I-43 and 44 - I-43, Yes, establish a minimum of 10% parkland dedication for new subdivisions. Do not reduce the dedication for parkland dedication to 5% for CDD for reasons identified under 10.3.4. - Policy I-1 – change may to shall. - 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. - Specific policy language suggestions from Ecology Action Centre for policies I-7, I-9, I-18, I-44, I-45. - Policy I-59 says we will consult, but the Advisory Boards (including Regional Watersheds Advisory Board) could not participate this round of consultation. It would be helpful to include explicit reference to the Advisory boards as consultees in the future. - Policy I-9 a) iii), it is great to see this included, but how will 'capacity to absorb' be determined for parks and community facilities? This policy should explicitly refer to utilizing the level of service standard policy outlined in CI-7.	Staff will review policy-specific comments provided when refining the Draft Regional Plan.

		- In 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. - In I-7 consider changing “pedestrians” to “those engaging in active transportation” to broaden policy scope. - Add “active transportation” to I-7. - Suggest parkland dedication I-43 policy be synchronized with I-45 and CI-7 – to factor in density in level of service standards. - Recommendation I-53 allowing relaxation of 100m buffer for drinking water reservoirs for private properties should be removed. I-50 and I-51 should consider inspection for septic systems where municipal water is provided, like Quebec. - In the Protected Water Supply Zone which, add clause in I-53 that HRM will work with the province to protect fish passage.	
Site Specific Requests			
Regional Plan Site Specific Requests	Case 22257 Purcell's Cove Backlands C025 Lands on Purcell's Cove Road	- Many comments expressing support for protecting the Purcell's Cove Backlands and preventing development in the area. - Several comments that the proposed 250-metre setback for development along Purcell's Cove Road is arbitrary, too large and does not meet the intent of the policy (protecting the area). The size of the developable areas would still allow development far into vulnerable and fire-prone areas. The Backlands are a Fire Ecology. Backlands Coalition recommends replacing of the Urban Reserve Zone on Purcell's Cove Road with an environmental approach to determining appropriate setbacks. This is consistent with the Main Land South Land Use Bylaw, which recognizes the unsuitability of certain lands (i.e. fire prone, flood plains, exposed bedrock, slopes greater than 16%, protection of water courses and ground water, canopy cover.) Recommend reflecting the currently predominant setback of 100 m from Purcell's Cove Rd. - Several suggestions on different ways to decide the buffer distance and what the new buffer should be. - The Backlands are fire prone and ecologically sensitive, the area needs environmental sensitivity mapping. - Wildlife corridors should be mapped and protected leading to this area. - Fire mitigation plans should be developed for this area. - CI-3 to CI-6, we are very happy to see the considerations of most of the Backlands being designated as a Nature Park. Supportive of the plan and protecting the wilderness in this area for future generations - RP-21: I also strongly support the Open Space and Natural Resource Designation for natural areas like the Backlands. - In addition to the rare Jack Pine / Broom Crowberry combination, the Backlands are a nesting area for the threatened bird species, the nighthawk. The area is a unique	This request is being considered as part of the Phase 4 Regional Plan amendment package. Comments will be considered in drafting these amendments.

		ecosystem that needs to be protected and preserved. Several comments supporting this. - The opportunity currently available to create one contiguous park in the middle of the Backlands bordering on the three parks named above should not be lost. The suggestion in the draft plan that a new Purcell's Cove Backlands Designation and Zone within the Halifax Mainland Secondary Municipal Planning Strategy and Land Use By-law be created would accomplish this goal. - Consider our efforts as a community towards reconciliation with indigenous peoples. Protect these lands and designate at least a portion as a Healing Forrest, an initiative that has been put forward to bring all people together in Canada's conversation towards healing and reconciliation. - Support for staff approach of re-designating and rezoning the remaining privately-owned lands currently zoned and designated Urban Reserve to an alternative designation and zone that recognizes the environmental and cultural importance of the Purcell's Cove Backlands. - This area does not have the capacity to support serviced water and sewerage so please do not consider this as an option. Previous planning proposals to bring services to this community have been rejected by the community so I don't understand why the city would consider another proposal. Servicing would be a huge expense for all who live this way (not to mention the City) many of whom cannot afford to pay for hookups to municipal services. - Re-zone properties along Purcell's Cove Road to enable a single property division with rural commuter zoning along the road and a natural area designation inland.	
	C071 Near Kidston Lake	- Many comments concerned about effect of development on Kidston Lake watershed – e.g. stormwater runoff into lake instead of into stormwater system, and how runoff from homes into the lake will impact water quality. - Several comments on how the current road system cannot manage increased traffic levels from development. - Dense housing development in relatively tiny Kidston Lake watershed will guarantee its water quality will be compromised to point it will no longer be swimmable. Mapping the watershed will prevent this by ensuring it can be protected. - A small connector road linking up to Dentith St would help traffic. - Concern that the schools in the area are already at capacity. - The infrastructure should be upgraded in advance of this development happening. - Concern that green space around the lake to build single family homes is a bad idea - Impacts to wildlife should be considered, including birds and coyotes. - This development will likely end up housing closer to 16,000 residents, underscoring the importance of developing a comprehensive transportation strategy. The Armdale roundabout is very congested already. The Kidston lake development plan must focus on expanding road networks connected to Herring Cove Road. Suggestions for new	This request will be considered as part of Phase 5 of the Regional Plan Review, when areas for future growth are considered.

		highway connection connecting Old Sambro Road to the 102, suggestions for how to avoid high traffic volumes on Beachstone Drive. - Concerns about traffic levels due to the development. - Urban reserve around Kidston Lake - some of the area around Kidston Lake that is currently designated Urban Reserve. It has areas of high ecological value, wildlife/green corridor, and has impacts on other waterways. Some of this area should be removed from development and have a different designation - one that recognizes the ecological value and protects it from development. - Concerns for wetlands in the area. - Ensure that future development of the lands being considered under Regional Plan Request C071 include moderate scale forms and affordable options.	
	C539 Stoneridge Fellowship Baptist Church	- As a resident of Lower Sackville living in Stonemount Subdivision, it is nice to see more residential development in my area, especially to help address the housing crisis. I 100% support the rezoning of the StoneRidge Fellowship Baptist Church property to allow for a medium density residential development. I am also very happy to see a mix of townhouses and apartments being included. I hope to see more residential development in the future around my area. - Additional information from the property owner explaining how the request fits into the municipality's stated goals for smart growth.	This request will be considered as part of Phase 5 of the Regional Plan Review, when areas for future growth are considered.
	C319 Highway 101 Interchange Lands	- Letter from Cobequid Cultural Society reiterating request for appropriate zoning and a purchase and sales agreement from HRM to build a performing arts centre.	This request will be considered as part of Phase 5 of the Regional Plan Review, when areas for future growth are considered.
	C337 Frasers Lake	- Many letters from residents received, compiled into one submission (C758). - Some residents concerned, opposed to this proposal due to lack of capacity in the sewage treatment plant. - This proposal would help address the housing crisis by enabling 690 residential units with municipal water and wastewater services. - Water levels are high in the lake already this year, don't feel the area is capable of handling the level of density proposed. - Several residents with many environmental concerns. - Not supportive of the proposal. Concerned who will have to pay for the service boundary expansion. - Not opposed to development in the area but the volume proposed is too high and will remove practically all the existing trees and cause worse flooding on the lake. - The area will need serious investments if this goes ahead – sidewalks, transit, more room in schools.	This request will be considered as part of Phase 5 of the Regional Plan Review, when areas for future growth are considered.

		- Environmental concerns, impacts to wetland, watercourse, wildlife, flooding of nearby areas, clear cutting impacting lake water supply and aquatic wildlife. Water quality will be impacted. - Schools are already full. - Has there been an environmental impact study/report done? - Traffic will be an issue, there are no other roadways or sidewalks near the development area and it is not well serviced by transit - Do not agree with the statement that the site abuts the service boundary. - There should be more accessibility to the nearby parks and trails. - Want an environmental and infrastructure impact assessments done. - Too dense for the area.	
	C719 Schedule J - Upper Hammonds Plains	- Not supportive of the proposal, this will just add more development to an already congested area. An emergency egress in this location would have been useless in the recent wildfire as that direction was blocked by the fire and leads to an overwhelmed Hammonds Plains Road, a road that is already gridlocked on a daily basis. - Support for this proposal to add more points of egress.	This request will be considered as part of Phase 5 of the Regional Plan Review, when areas for future growth are considered.
	Case C070-A, C071, C074 and/or C333. Herring Cove Holding Zone, Spryfield	- Sewage treatment or lack thereof in Herring Cove and traffic congestion on a two lane road. This development will add substantial load on both.	This request will be considered as part of Phase 5 of the Regional Plan Review, when areas for future growth are considered.
	C103 Lands East of Beaver Bank Rd C299 Lands near Barrett Lake, Beaver Bank	- Comment from resident that these lands support numerous species of plants and birds, as well as a den of coyotes. Have environmental assessments happened for these sites? - Traffic on Beaver Bank road will be an issue, as it is already congested	This request will be considered as part of Phase 5 of the Regional Plan Review, when areas for future growth are considered.
	C109 Lands north of Hammonds Plains Rd C317 Hammonds Plains Rd & Lucasville Rd	- Comment from resident about these proposals: the infrastructure in the rural areas does not support this growth and has not been accounted for in the rest of the Regional Plan. For example, Hammonds Plains Road is regularly gridlocked with commuters. It is currently functioning as a strategic corridor for traffic instead of a rural road, and this will worsen if these areas of development proceed.	This request will be considered as part of Phase 5 of the Regional Plan Review, when areas for future growth are considered.

	C517 Hammonds Plains and Majesty Court, Hammonds Plains C522 Voyageur Lakes, Hammonds Plains		
	C508 Lands Near Aerotech, Goffs	- Concerned about the proposal - this is a huge amount of units outside the boundary.	This request is being considered as part of the Phase 4 Regional Plan amendment package, and as part of the Aerotech rezoning project. Comments will be considered in drafting these amendments.
Suburban Plan Site-Specific Requests	Case 2023-00368 70 First Lake Drive	- Several comments about the height of the proposal, doesn't fit the area. - Criticisms of the way the development has some portions done through existing Development Agreement and some requesting buildings through Suburban Planning, would prefer 1 comprehensive approach. - Concerns about height, stormwater management, compatibility with surrounding neighbourhood. - Any expansion of the service boundary should first address whether the wastewater, school, transit, and recreation infrastructure can handle the growth in this area. - Concern about traffic issues, scale issues, concern about the impact on the health of the lake, concern that the six storey buildings being considered under existing policy have been sited and designed in an impractical way to keep options open for the larger development being considered through the Suburban Plan.	Comments on this request will be provided for Case 2023-00368 and to the Suburban Community Planning team.
	C339 Dunbrack / Lacewood	- Concerned about loss of commercial services in the area while the site is being redeveloped.	Comments on this request will be considered as part of the Suburban Community Planning program.
Feedback distributed to other Planning Groups	Phase 3 Request C086 Planning Applications Case 24057	- PROBE supports the HGNP. We believe HGNP and the Charette Report provide a unique opportunity to be the model for redevelopment of Ragged Lake Industrial Park. These policies should provide the foundation for sustainable development in the HRM Case 086 (Residential Development at Halifax Exhibition Centre), in HRM Case 24057 (Mills Drive industrial proposed expansion) and in other developments in the 100-900 block of Prospect Road. - The lands surrounding the entrance to Prospect Road will not only host redevelopment of Ragged Lake, but are the site of a proposal for a residential development at Halifax Exhibition Centre (Case 086) that includes housing for 4,300 new residents in a combination of townhouses and apartment buildings. The current proposal calls for this population, which is more than twice the size of any one of our 17 residential communities, to exit onto Prospect Road, a secondary highway that has clearly been	These comments will be distributed to the planning teams leading these projects/developments.

		identified for decades in the Supplementary Plan for District 4 as over capacity for the existing communities. - Ragged Lake Industrial Park redevelopment should be a model for implementation of Halifax Green Network Plan and the Charette Report and a mechanism for community input must be an integral part of this plan. - There is also currently a proposal (Case 24057) for a major expansion at Mills Drive Industrial Park, such proposal adding 120 acres to the current 58 acre site. This addition represents a significant increase of the industrial footprint and increased heavy equipment traffic to this already congested and accident prone area. - This development directly impacts a critical watershed feature, that being Drysdale Bog. As a raised bog, Drysdale Bog is a rare part of the watershed and is one of a very few number of raised bogs in the Province of Nova Scotia.	
	M District Development	- Does not want to see development near Lake Banook or high towers in the M District.	These comments will be distributed to the planning teams leading these projects/developments.
	West End Mall Development	- Against the proposed high rise development for Mumford/Halifax Shopping Centre – HRM should not look like New York City or Chicago.	These comments will be distributed to the planning teams leading these projects/developments.