

Beverly W. Miller
6182 South St.
Halifax, NS B3H 1T5
902.429.9540
beverlyandbobmiller@ns.sympatico.ca

May 05, 2009

re: HRM by Design

To his Worship the Mayor and members of HRM Council:

Introduction

I come before you to ask you not to pass HRM by Design. This plan is a train wreck. The much vaunted public participation process on which it is allegedly based is a myth. We sat on our bums and listened at those forums; we did not participate. The plan extended downtown into the south Barrington /Hollis neighbourhoods without the participation of the residents, The District 12 Planning Advisory Committee was excluded from the process, and it will create an underclass of citizens who cannot have a say in the future of their neighbourhoods or the downtown we all share; a disgrace in a province which just celebrated the 250th anniversary of democracy in Canada and a municipality which is developing a Community Engagement Strategy which says "Citizen participation is recognized as an asset and is valued and encouraged." It has no sustainability provisions, no housing program, no transportation model, and by raising the allowable heights on almost every building in the area, will set off a round of property speculation that will threaten every heritage building and indeed every low rise building in the area.

So why are we even considering this? The rationalization for HRM by Design stems from two erroneous perceptions that should have been laid to rest ages ago:

- that citizen involvement in the planning approval process has seriously curtailed development in Downtown Halifax, creating a shortage of new construction and driving away potential developers.
- That there is a huge pent up demand for new office space downtown that must be addressed immediately (and therefore the public must be eliminated from the process)

This is unacceptable: let's look at these myths:

- 1) the Heseltine Report (attached) prepared by John Heseltine, a local planner, for the Atlantic Planners Institute in 2007 put paid to the idea that Nova Scotia had too many appeals. He found that between 2002-2006 Nova Scotia had the fewest total number of appeals, the fewest number of appeals per capita, and the fewest number of appeals based on the value of building permits in Canada. It also has one of the strictest limits on who can appeal a planning decision.

- 2) Planning application times: In February 2008 a staff report on planning times noted two things dragging out planning applications; a lack of staff and the fact that developers were not prepared when starting planning applications. By last December 8 staff reported to Council that five more planners had been hired, they had cracked down on developers requiring more preparation, and were exceeding Council-set goals for planning application times in 5 out of 6 areas.
- 3) And finally the Turner Drake report which very specifically addresses the myth of “more space”. This report was commissioned by staff last summer, delivered to the HRM Manager of Economic Development on November 8 and disappeared until March 24. Staff did not like it and is it any wonder? Here is what it said about space. “There is no evidence to support the assertion that there is a large pent-up demand for office space. Nor have we been able to locate much evidence of the substantial out of province demand so widely quoted by Nova Scotia Business Inc.” “In our opinion, the key driver for all types of space in Downtown Halifax is its unique character... The environment thus created is Downtown Halifax’s major competitive advantage, which once destroyed will never be reincarnated”.

Council also now has a report from GPI Atlantic, that addresses the fact that no proper cost-benefit analysis has been done on any aspect of this plan. “It is therefore most surprising to read that—without having conducted any proper impact analysis— HRM by Design nevertheless contends that “there is capacity for [this growth] without negative impact on the open space, heritage protection and urban vibrancy goals of the project.” “GPI Atlantic has not seen the evidence base for that contention, and would argue that approval of HRM by Design should be contingent on convincing evidence to support such contentions.”

It is not enough to say, as I have heard expressed, that this isn't perfect, but we should pass it anyway, that a half a loaf is better than none, that it is 80% right. If we are going to replace the present plan it must be with something better, not something inferior. I ask you to reject this plan and if you want a new plan direct staff to come back with a strong properly formulated plan based on proper research and analysis that protects our assets and the right of all citizens to participate in the planning for our neighbourhoods. Anything less is unacceptable. The Heritage Trust of Nova Scotia presented an excellent alternative plan.. Why not start with that?

n.b The Heseltine report is attached.

The Turner Drake Report is in the March 24 Council minutes-Information Item #5. it is called *HRM by Design: Demand, Capacity, Baseline Indicators Study*.

