



October, 2023

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

Dear Regional Planning Team,

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

Overview

- Generally, we were impressed that the Regional Plan introduces concepts and policy language to **further implement HRM's priority plans**, mainly the Halifax Green Network Plan, Integrated Mobility Plan, and HalifACT. We are hugely supportive of these plans and want to ensure they are used to guide new growth and development in the region.
- The Regional Plan is successful at **acknowledging HRM as a part of Mi'kma'ki**, an essential step for beginning to acknowledge Treaty and inherent rights and advancing reconciliation. We recommend working with local Mi'kmaq First Nations to further the conversation about how to use a two-eyed seeing approach in land-use planning.
- We are pleased to see that this Plan takes a different approach (i.e. not a time-bound approach), to **plan for a future population of 1 million people**. It is no surprise that the Province is growing and experiencing unprecedented housing need and stress on our municipal services. It is imperative that we take swift action to address current needs, while also planning for this projected growth.
- We support a target of **90% of new growth into urban and suburban areas**. Using this new growth to improve our existing infrastructure and services will help to reduce our GHG emissions and promote more walkable, sustainable, complete communities.
- The Regional Plan is also successful at **introducing planning concepts like 'missing middle'** to help promote building more dense communities. We envision communities with diverse housing options, active and public transit, essential services, and access to nature. Firm standards for complete communities need to be developed and growth and development decisions should be made accordingly.
- There is stronger acknowledgement of the benefits of natural ecosystems and natural assets like **wetlands, watercourses, parks, and wilderness corridors** in this plan. However, questions remain about how these natural assets will be prioritized when reviewing development decisions, and conflicts between plan priorities and development rights will be resolved.
- Our main concern is with **implementation tools**, and the ability of staff and Council to move from plan to action. We want to ensure this Regional Plan provides firm guidance and actionable implementation to **discourages growth where it will cause harm, protect valuable greenspace, and promote the type of development** that will help us achieve a more affordable, healthier, and sustainable future.