

RESPONSE to
REGIONAL MUNICIPAL PLANING STRATEGY
JUNE 2023
DRAFT

I wish to thank you for the invitation to comment on the Draft HRM Regional Plan, 2023.

I write with the intention of improving our Environment, our Community, our Sackville Rivers and their watersheds.

We trust that you will find my comments helpful and constructive.

Thank You
Walter N Regan
18 Oct 2023

Chapter 1: Introduction

1.2 Regional Vision and Principles

1.2.3 Principals

Add a bullet

- Shall, as a critical component of environmental management, restore degraded aquatic and terrestrial habitats

Chapter 2: Planning for Our Region

2.3 Regional Planning

RP-1 add after “protect” “, restore”

2.4 Community Planning

RP-10 add “while respecting environmental issues and concerns”

2.5.2 Growth Targets

RP-13 I agree with the intent of this sub-section.

2.5.3 Service Areas

RP-14 I agrees with sub-section

2.6.1 Growth Monitoring Program

RP-18 add “environmental conditions” “after population”

2.6.2 Long Term Growth and Infrastructure Planning

I support this section.

2.7.1 Open Space and Natural resource Designation

I support this section.

2.7.4 Rural Commuter Designation

I support this section.

RP-28 a) add “such as wildlife corridors, wetlands, watercourses and buffers” after “natural features”..

2.7. 5 Rural Resource Designation

I support this section.

Chapter 3: Building Healthy and Complete Communities

3.4.5 Future Serviced Communities

Remove “Sandy Lake” from Table 3.3

HC-7 add ix) “Wildlife Corridors”

HC-7 ii) add “entire sub-watersheds” after “watersheds”

HC-7 iii) add (i.e. Lucasville Road, Lucasville Greenway and Sackville River Conservation Corridors)

HC-8 d) add “including aquatic habitat restoration and daylighting”.

m) add “wildlife corridors”

3.5.1 Vision for Rural Community Planning

HC-9 add” j) Watershed Mapping, floodplain mapping, zoning and stream gauging”.

Add “k) Wildlife corridors, wetland mapping,”

3.5.2 Rural Services and Mobility

I support this section.

Parks: 4.2

Section CI-1 and CI-2 Sub-sections a-h

I support the development of a Regional Parks Priority Plan.

Nature Parks: 4.2.1

I support the addition of 1,800 acres to the existing Sandy lake Regional Park.

I support Sections CI-3 to CI-4.

I do not understand the position of Section 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?

Level of Service Standards

Section CI-9

Where a proposed development is considered by development agreement, the Municipality shall consider the acquisition of riparian buffers, wetlands and islands as public open space to protect public interest, facilitate public access, create wildlife corridors and preserve water quality.

Community Facilities: 4.3

Im in favor of Section CI-10, in particular Sub-section (a) and Section CI-11: in particular Sub-section (c).

Food Security: 4.7

I support Food Security initiatives, particularly the provision of space for community gardens, and the encouragement of construction utilizing green roofs.

Urban Agriculture: 4.7.2

Im in favor of this section although any shipping containers for the uses specified in this by-law must be well maintained.

Green Roofs: 4.7.3

I support this section. Green roofs would also help sustain insect pollinators. HRM should consider funding opportunities to encourage Green Roof construction under this strategy.

Solid Waste Management: 4.8

I, over the past 35 years has retrieved hundreds of shopping carts from the Sackville Rivers during clean-ups. With respect to the existing shopping cart by-law, there is a definite lack of enforcement. HRM Staff is reluctant to enter watercourses to remove abandoned shopping carts that have been reported.

I'm in favour of the establishment of local transfer stations and the waiving of dumping charges for residents, to discourage illegal dumping.

4.9 Regional Energy and Telecommunications Infrastructure:

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.

HRM should encourage NSPI to use bridges or bottomless culverts for watercourse crossings where necessary.

I support Section CI-38.

I support Section CI-40 to allow more opportunities for tree growth (i.e. Urban Forest).

5.0 Fostering Diverse and Affordable Housing:

I support any initiative under this Plan to discourage urban sprawl and encourage ground water recharge and minimize hard surfaces.

I encourage the establishment of retention ponds and naturalized areas including day-lighting and rewilding within any high density developments.

On infilling of sites/ areas, green space should not be destroyed or developed.

On redevelopment of sites, (especially urban sites), shall create green space and parks and include adjoining sites if possible. This should also apply to Provincial sites (e.g. schools, community centers and housing developments).

Adaptive Reuse: 5.2.3

Section H-10: a) iv, to include green areas, parks and other amenities for public use and enjoyment.

v, sites are not to be 100% developed.

10-b) iv, v to include green areas, parks and other amenities for public use and enjoyment. Sites are not to be 100% developed.

Section H-11

I suggest the addition of a sub-section,

f) sufficient green space and/or naturalized areas and to include green areas, parks and other amenities for play areas and enjoyment.

g) sites are not to be 100% developed.

5.3.2: Incentive or Bonus Density:

Section H-18

I like the use of Density Bonusing but caution that it must 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.

Chapter 6: Protecting the Environment and Acting on Climate:

Objectives 6.1

I support statements 1 to 7, especially 6.1 5

I would suggest the addition of additional objectives.

.8 Mitigation efforts to fund, support and encourage stream, lake and watercourse fish habitat restoration.

.9 Promote **daylighting** of buried watercourses.

.10 Promote the creation of Master Storm Water Plans on a natural watersheds.

.11 Undertake flood plain mapping, zoning and stream gauging for all watersheds within the Municipality.

.12 Undertake water quality testing for all watercourses within the Municipality, (lakes and rivers).

.13 All watercourses within the Municipality shall have individual Watershed Management Plans. HRM shall take the lead on creating and managing the watershed plans.

.14 HRM shall take the lead on liming of acid stressed rivers in the Municipality.

Section 6.2 Protecting and Connecting our Green Spaces

I fully support EC-1 and encourages the **Updating** of the very important Halifax Green Network Plan.

I support Section EC-2, EC-3, EC-6

I strongly support Section EC-5, which “establishes Protected Area Zones”.

I fully support Section EC-7, especially for the acceptance of wetlands, riparian buffers, tree stands, floodplains, vernal pools, drumlins and forested areas.

Section 6.3.1.2 Preserving Natural Corridors

I support the intent of this Section; however we suggest the following revisions and additions:

Section EC-8 ... the Municipality shall consider refining add < without reducing or removing > the boundaries of the Essential Corridors.

Add definitions of Essential and Important Corridors

Section EC-10 the Municipality shall also identify Important Corridors on Map 6

Section EC-11 –add c) the acquisition of land in public ownership for Essential and Important Corridors where necessary.

Section EC-12 I do not agree with this by- law. It removes the true purpose of an Essential Corridor.

Section EC-12 also conflicts with the intent of EC-11- i)

Section EC-13 a) add, and shall also identify Important Corridors.

Section EC-13 c) I fully agrees with this provision (see EC-11 c above)

add d) consider opportunities for wildlife crossings **<over and under>** transportation infrastructure or other major barriers.

add e) the Municipality shall identify Essential and Important Corridors especially in rural areas prior to loss and development pressures.

add f) both Essential and Important Corridor widths should be as stated in the Halifax Green Network Plan as a minimum.

add g) both Essential and Important Corridors should be as stated in the Halifax Green Network Plan, and should be extended beyond the floodplain buffer as a minimum and be beyond the watercourse setback.

add h) both Essential and Important Corridors that follow watercourses shall a minimum width of 100 metres.

6.3.3 Naturalization and Municipal Natural Assets Management

I strongly in favour of this section.

Section EC-15 Add a) Naturalization to cover restoration of degraded watercourses, fish habitat improvement and daylighting of buried watercourses including buried streams and brooks and feeder streams damaged by storm surge.

add b) 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 (i.e. Sandy Lake Lands and Feely Lake).

6.3.4 Urban Forests

I recommend that several positions be created in the Planning Department of HRM to develop and manage the Urban Forests Plan.

That a new Master Urban Forest Plan be undertaken.

Section-EC-17, I'm strongly in favour of this section.

Section EC-17 Add a) a by-law to be created to insure protection and replacement of trees on private property.

6.4 Protecting Our Water

I'm strongly in favour of this section.

Section 6.4.1 The Umbrella-Watershed Planning

I'm strongly in favour of this section.

Section 6.4.2 Watershed Management

Although I agree with the intent of this section, in many areas there are no community –level groups to assume a Stewardship role. In these cases HRM must create and manage Watershed Management Plans.

Many watersheds cross Municipal boundaries, HRM Staff should take the lead and be involved in inter-municipal watershed planning. It is extremely difficult for community –level groups to deal with the different levels of government with respect to environmental issues. HRM shall provide leadership, liaison and staff to facilitate coordination of inter-governmental cooperation.

Using the Watershed as a basis and defined unit of measurement for Watershed Planning is an excellent one which we fully support.

Section EC-18

HRM Staff shall develop Watershed Management Plans for all Watersheds (approx. 100) within the Municipality.

The Watershed Management Plans shall consider:

EC-18 a I support this sub-section

b) Determining and mitigating the impact of water pollution through storm water treatment, water quality testing of lakes, rivers and streams as well as floodplain mapping, zoning and stream gauging. Reduction of hard surface. No direct discharge of storm water into watercourses. The development of a policy to reduce the effects of acid precipitation including liming of water courses. Installation of oil/grit separators, daylighting of buried and lost streams.

add c) Acquisition of large natural assets and conservation areas i.e. Sandy Lake lands and Feely Lake. Engineered wetlands for storm water retention and detention.

d) The impacts of climate change and measures to reduce those impacts such as acquisition of large natural areas and daylighting of buried streams. The acquisition of minimum 30 metre wide riparian buffers in public ownership. Installation of oil/grit separators, floodplain mapping, zoning and stream gauging. New Red Book /White Book regulations on culvert installation and upgrades to fish friendly types allowing for proper fish, amphibian and animal passage - (bottomless culverts, bridges, and road over and under passes).

e) I strongly support this sub-section; add <storm water treatment, no direct discharge of storm water into watercourses and the development of a policy to reduce the effects of acid precipitation including liming of water courses. Floodplain mapping, zoning and stream gauging>.

f) I fully support this sub-section. Add floodplain mapping, zoning and stream gauging and watercourse water quality testing.

g) Supporting, enhancing and/ or restoring habitat connectivity in riparian and aquatic zones, upstream and downstream fish passage, as well as daylighting buried streams and brooks. New Red Book /White Book regulations on culvert installation and upgrades to fish friendly types allowing for proper fish, amphibian and animal passage (bottomless culverts, bridges, and road over and under passes). Provision of grants to community groups to aid in habitat connectivity restoration.

add h), to include Master Storm Water Watershed Management Plans – of entire natural watersheds. Reduction of hard surfaces, no direct discharge of storm water into watercourses, stream gauging and ground water recharge. Highly improved by-law enforcement of riparian buffer integrity.

i) I support this sub-section. All riparian buffers must be in public ownership. Riparian Buffers kept in a natural state will protect water quality for adjoining wetlands and forests, riparian buffers should be established for daylighted streams and brooks . (i.e.1,800 acres at Sandy Lake, Feely Lake). This Policy increases in importance where wildlife corridors adjoin Riparian Buffers.

j) I support this sub-section and emphasizes the importance of water quality testing of all water courses in HRM to form a database of water quality. “add HRM should map and register all wetlands, rivers, brooks, lakes and streams in HRM in one central database for protection and to help save these from destruction and aid in planning”.

k) I support this sub-section, (including developing a Grant program), however where community stakeholders and municipal programs are not available, HRM shall take a leadership role in Watershed Management.

l) I support this sub-section, however HRM shall take a leadership role in the implementation of management plans for all watersheds.

6.4.3 Watershed Studies

Under current engineering practices, feeder brooks suffer from the negative effects of storm surge causing stream bank erosion and heavy sediment loading.

EC-19 Add, The provisions of this section shall also include subdivisions, proposed and existing, both serviced and unserved.

- a) establish a reliable and accurate baseline of existing water quality for all watercourses in HRM. Use biological indicators as a guide to water quality, (i.e. Speckled Brook Trout and/ or Atlantic Salmon).
- b) remove the word “key” and add “all”.
- c) evaluate the capacity of any existing water control structures in the watershed while also specifically determining their efficiency for upstream and downstream fish

passage. Control structures to include all dams and culverts on natural watercourse. The negative effects of buried streams and brooks to be considered.

- d) model potential impacts to water quality and quantity as a result of development and determine the amount of development, maximum inputs and rate of discharge that receiving watercourses can assimilate without adversely affecting water quality and quantity.
- e) Add, “and quantity “after water quality.
- f) Add, HRM shall take remedial measures to include restoration of impacted fish habitat.
- g) Identify and implement remedial measures to improve water quality and quantity, include liming of watercourses, oil/grit separators, engineered wetlands, hard surface reduction.
- h) Add, “loss of groundwater recharge after “environment”. Areas to be identified by Floodplain Mapping, Stream Gauging followed by Floodplain Zoning. (e.g. Union Street, Bedford and Sackville and Little Sackville Rivers). All 30 Metre buffers or larger to be in Public ownership. add i) HRM shall undertake Floodplain Mapping, Stream Gauging followed by Floodplain Zoning (e.g. Sandy Lake, Tree planting, buffer ownership, tree retention by-law).
- j) Recommend strategies to achieve water quality objectives set out under the watershed study to include habit improvement to return lake water quality to pre-development levels and groundwater recharge. Consider installation of aqua lung systems for lakes.
- k) Add “all HRM Watersheds” after “within”. Watercourse buffers and wetlands to be in public ownership,
- l) Identify appropriate riparian buffer widths for wetlands and watercourses. Minimum widths to be 30 meters up to a maximum of 100 meters for major rivers, important lakes and wetlands. These buffers to start outside of floodplains.
- m) I support this sub-section. HRM Staff to manage and operate the watershed groups with funding from the HRM budget. HRM should consider Conservation Authorities similar to those in Ontario.
- n) HRM shall develop watershed monitoring programs for all watersheds in the Municipality.
- o) aground water in all areas of HRM shall be protected for quality and quantity with respect to groundwater recharge. HRM shall conduct groundwater mapping for all of HRM. (Remember Walkerton. Ontario).
add

6.4.4 Rural Community Watershed Management

EC-20 Revise –The Municipality shall revise all Secondary municipal planning strategies in rural areas to consider the following:

- a) I support this sub-section.
- b) I support this sub-section.
- c) I support this sub-section.
- d) I support this sub-section.

In addition for existing developed areas where the threshold has been exceeded, HRM shall undertake legislative and mitigative initiatives to reduce the effects of impermeable surfaces and restore levels of water quality and quantity, (i.e. The Fraser River Valley Basin recommends maximum 10% hard surface).

- e) remove “Where applicable” add “and acquiring land for” after “protecting”

6.4.5 Lake Monitoring --add “and Rivers” - to Title

I strongly support lake and river water quality monitoring.

EC-21 add- HRM shall provide a leadership and management role to monitor water quality in all lakes and rivers in the municipality.

EC-22 remove “to provide guidance” and add “and restorative or mitigative efforts such as sediment removal from watercourses and liming.

I strongly support that mitigate measures must be done to return watercourses back to a natural state. Testing shall lead to restorative actions.

EC-23 remove “may” and replace with “shall”.

6.4.6 Riparian Areas and Wetlands

6.4.6.1 Riparian Areas

EC-24 the 30 meter wide buffer shall be acquired in public ownership. Large rivers and important wetlands shall have a minimum buffer of 100 meters. Remove “as well as” and replace with “and”. Remove “contiguous with watercourses”.

HRM should acquire existing riparian buffers along watercourses.

EC-25 I support this section. Wherever possible these features (especially storm water infrastructure) shall be constructed to maintain the integrity of the riparian buffer.

EC-26 I support this section with the provision that it apply to as-of-right development throughout the municipality.

EC-27 Change “shall” to “may”.

Vegetation within the area of the reduced riparian buffer shall be re-constituted to a natural state where possible by landscaping and plantings.

Given the ever increasing awareness and concern with regard to water quality, HRM shall develop an outreach or education plan to educate the public on the vital importance for protection of wetlands and riparian buffers.

I feel very strongly that under the Regional Plan very little attention is given to indentifying and policing 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 responsibly 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.

Post development, trees and other 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 land 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.

EC-28 Change “shall” to “may”.

EC-29 Change “shall” to “may”.

EC-30 the SRA fully supports this section. Add HRM shall have a Tree Retention By-law for the entire municipality, to include riparian buffers.

EC-31 I fully support this section. Change “may” to “shall”.

6.4.6.2 Wetlands

EC-32 I support this section. Only as a last resort should the Municipality allow for existing or install new public infrastructure. This by-law will apply regardless of a wetland with or without a watercourse through it.

EC-33 I support this section. Change “may” to “shall”.

EC-34 I support this section. The 30 metres setback (100 meter for larger rivers and wetlands) should be turned over to the Municipality as a public owned buffer.

EC-35 add (c), all wetlands and vernal pools shall be indentified and protected with a minimum 30 meter buffer.

6.5.3 Stormwater and Flooding

HRM currently requires Sedimentation Control Plans for developments. These plans require approval before project commencement. However, the failure being total lack of inspection to insure compliance with the plan, both during installation and continued maintenance after installation particularly after large rain events. HRM must take responsibility to insure that the sedimentation control procedures and structures are implemented correctly and maintained through the period of development. Post-development these structures (i.e. silt fences and curtains) shall be removed.

Stormwater quality and quantity control measures shall apply wherever possible to privately operated facilities.

Downstream and upstream flooding may be reduced due to increased flow through a bridge or bottomless culvert

Wherever possible culverts are to be installed or replaced. Reference shall be made to EC-45 (b).

Maintenance will be reduced with removal of the culvert and replaced with a bridge or bottomless culvert

May increase tourism as happened in Dartmouth with Day lighting of Sawmill River.

Any water used for water main or water line flushing must be directed to a sanitary sewer for disposal (not allowed to enter a storm sewer or natural watercourse).

EC-39 I support this section.

EC-40 I support this section. HRM should also involve local Stakeholders Groups and the public and set up a working group to discuss on going stormwater issues.

- a) Add adopting a site service charge to fund on going water quality, and in stream restoration an remedial work

EC-41 I support this section, with emphasis on the naturalized approach to storm water management and storm water treatment.

Naturalized approaches increase groundwater recharge. Include green roof construction, water gardens, oil grit separators, engineered wetlands, in stream habitat improvements, hard surface reduction, daylighting, stream gauging and floodplain zoning (especially during redevelopment or reconstruction) .

EC-42 remove “consider”, change “adopting” to “adopt”. After “matters may” change may “to “shall”.

- a) Remove ”the cost and effectiveness of”
- b) I support this sub- section
- c) I support this sub- section add “and redevelopment”
- d) I support this sub- section, add “storm water treatment”.
- e) I support this sub- section

Add f) sub-sections – a to d shall apply to existing developments and re-developments with emphasis on:

- no direct discharge into watercourse
- no permanent disturbance of naturalized buffers
- increase use of permeable surfaces to reduce storm water run-off and increase groundwater recharge
- the object should be not to exceed maximum inputs and rate of discharge that receiving watercourses can assimilate without adversely effecting water quality and quantity and to avoid stream bank erosion and damage to wetlands

EC-43 change “may” to “shall”, add “by end of pipe treatments” after “facilities and watercourses”.

- a) I believe that Education Programs to educate residents on the issues and effects of storm water on receiving waters is an important item and HRM should conduct these programs on an ongoing basis.
- b) HRM should consider stream gauging of all rivers in the municipality as monitoring river flows would help with water quality testing, water quantity measurements and indication of changes in increased flows due hard surfaces.

EC-44 Change “may” to “shall”

- a) All bridges and open bottom culverts shall be designed for the anticipated 100 year storm
- b) Fish habitat improvement and protection shall be considered.
- c) Daylighting will also help mitigate the effect of climate change.

EC-45 change “may” to “shall’

- a) I support this sub-section
- b) I fully support this sub-section
 - i) All bridges and open bottom culverts shall be designed for the anticipated 100 year storm
 - ii) Fish habitat improvement and protection shall be considered

- c) I support this sub-section
- d) I support this sub-section

EC-46 I support this sub-section.

EC-47 I support this sub-section.

6.5.4 Floodplains

HRM must start Floodplain Mapping, Floodplain Zoning and Stream Gauging for all watercourses in the municipality.

HRM should create a policy for acquisition of all 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.

Why does the HRM policy only apply to mitigate the consequences of flooding along major rivers only? Regulations should apply to all rivers.

Please note the 2017 CBCL Limited Sackville Rivers Floodplain Study-Phase 2, (pg 76), states “ Recommendations have been generally towards more sustainable, low maintenance , more nature oriented approaches, which provide not only solutions in flooding risks, but also additional advantages in terms of erosion protection, water quality improvements, overall aesthetics and protection/ restoration of natural character of the rivers. This is consistent with the Sackville Greenway Plan, The Halifax Regional Plan and the Halifax Green Network Plan (Greenbelting and Open Space plan)”

“(Pg 77), Recommendations for flood mitigation, beyond adopting flood lines in the report into planning regulations are the following:

- 1) . Stormwater Infiltration-Best Management Practices (BMP) and Low Impact development (LID).

- 2) . Increasing channel capacity through river restoration: Other recommendations approaches include conducting river restoration to increase capacity and storage in river sections that have been channelized. Significant ecosystem benefits are also achieved.
- 3) . Purchasing properties at risk: The impacted individuals are now permanently safe, properties at risk can be restored to the natural floodplain, upstream flooding risks can be reduced, there is no further maintenance cost or residual risk, and the riverfront area can now be enhanced for public enjoyment. The challenges are its cost and resistance from property owners. Where not yet developed; purchasing floodplain lands can ensure their protection in the future.
- 4) . Flood Protection Infrastructure: Options such as upgrading bridge structures, building berms, or rising the level of the land or homes, should only be used after the above options have been exhausted. They will be expansive, require maintenance, will move the problem downstream and will place public safety at increased risk for events greater than the design event.”

EC-48 Fails to identify the designated watercourses. This should apply to all watercourses.

Where flood plain extents have not been defined, HRM shall require any building construction to be at pre-determined horizontal setbacks and/ or elevations to minimize potential property damage due to flooding.

No building to be allowed in the 1/20 year floodplain.

EC-49, EC-50, EC-51, no comment.

EC-52 change “may” to ‘shall”

6.5.5 Coastal Protection

I support this section.

EC-61, change “may” to “shall”

EC-62, add a) The Municipality shall limit development on freshwater islands through land use by-laws.

6.5.6 Protecting Infrastructure

After “food systems” insert “such as culverts, bridges, under ground services and roads”

EC-63, add

- a) restrict development in flood plains
- b) encourage the use of bottomless culverts or bridges (fish passage)

- c) encourage the use of naturalized detention and retention ponds for groundwater recharge and storm water control
- d) daylight of buried brooks and streams
- e) encourage the use of engineered wetlands
- f) develop a policy of Master Stormwater Planning by HRM.
EC-65, a) add “such as green roofs”
Add

f) develop a policy and support for liming infrastructure and initiatives

EC-66, Add e) daylighting, in stream restoration and relocation of facilities from floodplains

Add d) retrofitting of car parking lots for large Bus Terminals with permeable surfaces, green roofs, oil grit separators, tree planting, storm water retention, pavement reduction

6.5.8 Wind Energy

EC-75 I support this sub-section

EC-76 add

- a) there shall be a policy to mitigate habitat loss during road construction and installation of transmission lines
- b) riparian buffers and wetlands shall be respected

7.1 Objectives

I support this section.

7.4 Regional and Community Mobility

M-4 Add Extend the Community Mobility Network as shown on The Regional and Community Links (Map 7) to include Lucasville Road.

M-5 Add

- q) construct the Lucasville Greenway
- r) create a standing committee for recreation and AT Trails for construction and maintenance (HRTA)

M-7 a) add <such as extending the Community Mobility Network as shown on The Regional and Community Links (Map 7) to include Lucasville Road>.

7.4.2 Transportation Reserves

M-10 add

- a) and acquire ownership or a limited interest in lands where a trail/ greenway may be in the public interest, (Lucasville, Hantsport Railway, Sackville River Conversation Corridor).

7.5 Complete Communities and Streets

7.5.1 Complete Streets

I support this section.

7.7 Active Transportation

Add to 7.7 after first paragraph:

I believe that AT should be fully funded on an on-going basis. HRM should adopt “Third Mode Funding Concept “as used in New York.

M-25

Add a) combine the management of recreation trails (Parks and Recreation) with the AT Network.

- b) Create an advisory group for trails (similar to Halifax Regional Trail Association- with Staff, members from the various trail groups and Councillors).
- c) Funding for Recreation Trails and AT Trails be significantly increased and with a large increase in HRM Trails Staff.

M-26 add f) Recreation Trails

M-27 I fully supports this sub-section

M-28 I fully supports this sub-section

- a) All new developments shall contribute to the Capital Cost Contribution to help fund and build AT trails, (similar to M-30)

7.7.1 Walking and Rolling

I fully support this sub-section.

7.7.2 Cycling

I fully support this sub-section.

I do not support the use of motorized vehicles for regular use on multi-use trails. Use of ORV's however, is supported for service and maintenance of said trails.

7.8 Public Transit

M-34 The Urban Transit Service boundary shall be revised on Map 7 to include Lucasville.

M-35 The SRA fully supports this sub-section.

- a) Long term plans shall be developed for future Transit plans encompassing the entire Municipality. This Plan shall consider 100 year time frames.

M-36 I fully support this sub-section.

M-37 I fully support this sub-section.

M-38 I fully support this sub-section.

M-39 I fully support this sub-section.

7.8.3 Rural Public Mobility

I fully support this Section

7.9 Curbside Management

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.

7.11 Looking Beyond: The future of Transportation Planning

M-47 I fully support this section particularly eco-system restoration to include (aquatic habitat) river restoration.

M-48 k) the 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

8.2 Economic Strategy

EP-1 remove “support “from “support environmental sustainably” and replace with “emphasize”

8.4 Industrial Employment Lands

EP-11 revise “map 6” to include the Sackville River –Sandy Lake Corridor

f) HRM shall 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 overcome the hollowing out of our downtowns and keeping business in our downtowns viable.

8.4.6 Page No 136, (THIS SECTION MIS-NUMBERED- SHOULD BE 8.4.4) Industrial Land Protection, NO SECTION 8.6,

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 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.

8.4.5.2 Water Lots

EP-22 I agree with this sub-section.

Add a) water lots should be acquired whenever possible in public ownership.

EP-23 I agree with this section.

8.5 Rural Employment Lands

I support this section (GNP Working landscape Open Space Plan Values Map)

8.7 Tourism

With in-stream conservation and habitat restoration annually amounting to about 10 million a year and Recreational Fishing worth approximately \$70 million annually in NS and about \$21.5 million a year in HRM (with about \$1.5 million a year from tourism). Recreational Fishing is very important to HRM and should be recognized and supported.

EP-28 add e) by considering nature parks, Conversation Areas, park expansion (e.g. Sandy Lake Park, Blue Mountain- Birch Cove), birding, canoe and kayak and other nature based activities.

Add f) Hunting and fishing opportunities (including deep sea fishing and sight seeing)

Add g) work with other levels of government to develop a HRM wide Park Tourism Plan similar to what is being done for new roads.

8.7.1 Rural Tourism

Clean air and clean water resources are key to attracting tourists to HRM. Recreational fishing has been a strong tourism draw in the past. HRM should work with the Province to increase fishing related tourism.

A liming program could be developed for low ph impacted watercourses. Increase the number of Conservation parks (e.g. Sandy Lake, Freely Lakes, Anderson Lake and Beaver Bank Lake).

Develop trails with natural and historical significance. HRM should acquire lands of a natural and historical significance as parkland.

Reduce the use of fossil fuels for building facilities and municipal vehicles.

8.8.1 Historical African Nova Scotia Community Action Plan

EP-37 after “themselves” add “e.g. Lucasville Greenway and the extension of public transit to serve Lucasville”

8.9 Green Economy

EP-43 add

- a) institute a liming program for low ph impacted watercourses
- b) maintain and increase the Urban Forestry Program throughout the Municipality
- c) encourage eco-tourism

Chapter 9 Celebrating Culture, Arts and Heritage

CH-20

- a) Build and support a Cultural Center in Middle Sackville (700 hundred seats)
- b) Support local Heritage Society (e.g Fort Sackville, Fultz House, Sackville Community Radio, Seaside Radio)
- c) Support and fund Beaver Bank Society and Sackville Business Association as supporters of Canada Day, Natal Day and Winter Carnivals.

Chapter 10: Implementation

10.3 Planning Tools

10.3.1 Secondary Municipal Planning Strategies

I-4 I agree with this sub –section

I-7 a) I agree with sub-section

b) Add (e.g. Sandy Lake, Blue Mountain Birch Cove, and Feely Lake)

c) I agree with this sub-section

d) Add (e.g. Lucasville)

e) After “site level green infrastructure” add “such as green roofs, bioswales, rain gardens, artificial wetlands, and naturalized detention and retention ponds for stormwater management.

10.3.2 Priority Plans

I support this section.

10.3.3 Discretionary Applications

1-9 a) ii add “and groundwater resources and parks systems”

b) After “wetlands “add “floodplains” after “susceptibility to flooding “add groundwater resources”.

I-10 I support this sub-section

Add in b) after “prone to flooding” add “by floodplain mapping)”

Add in c) before “essential” add “important’

Add in d) “Important” and before “Essential”

Add e) including stands of mature growth trees

I-11 I strongly support this sub-section.

Add “aquatic and terrestrial” after “degraded”,

after “identified” add “as well as adjoining properties”.

I-12 The term “limited in scale” is not defined and must be to strengthen this sub-section. “not to exceed “should be added”.

Add “d) all environmental protections are considered and natural areas and watercourses are protected in the proposed development.

I-17 a) I agree with this sub-section

c) I agree with this sub-section

I-18 b and c) I agree with this sub-section

10.3.4, Page No 168, THIS SECTION MIS-NUMERED- SHOULD BE CHECKED AS IT THROWS THE NUMBERING SYSTEM AND PAGES OUT. Page No 163, 10.3.4.

10.3.4 Special Planning Areas (page 168)

I do not support this section. The intention removes public input and circumvents the HRM planning process. Sandy Lake and Drain Lake have been designated as Special Planning Areas. Environmental protection of the Sackville River and tributaries is of paramount importance to our Association.

I'm strongly in favor of 1-20 a), b) and c). In our experience, the problem has been that these plans, in most cases are not implemented in their entirety throughout the course of the project and are not inspected to ensure functionality.

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.

Special Planning Areas should not be excluded from the normal HRM Planning Development process.

10.3.5.1 Suburban Area Sites

I-21 f and m) I support this Section

I-22 the text of sub-section I-21 f) should be added to this section.

10.4 The Regional Subdivision By –law

I support this section.

10.4.4 Parkland Dedication

I support this section in general

However we suggest adding:

I-43 a) where it is necessary to protect environmental features that exceed 10% park dedication the Municipality may establish a larger percentage for park dedication. (Conversation zoning will be in addition and not to be included in the 10%)

I-44 add c) where 5% park dedication does not include significant ecological or environmental features the percentage for park dedication will be increased.

I-45 add g) importance as conservation areas, environmental areas, Special and Important Wildlife Corridors and natural features.

Add h) the lack of green space in our downtown (s) areas HRM shall work to increase the number and areas of Green space in those areas.

10.5 Water and Wastewater Services

10.5.2 Water Service Areas

I-52 a) (iii) change “plan” to “system” and” “considered” to “constructed” and a Waste Water Management Zone is also considered.

10.5.3 Source Water Protection

I agree with this section, with the provision that Tomahawk Lake, designated as a Future Water Supply Area shall be provided with fish passage facilities (both up and down stream) should any dam or water control structures be necessary. We are not in favor of any diversion of water from Tomahawk Lake to another watershed.

Any water removals from this lake shall only be permitted after an Environmental Impact Study is carried out and water quantity to Tomahawk Brook and the Sackville River is not negatively affected.

10.5.4 Ground Water Supplies

I agree with this section.

HRM should carry out municipal wide ground waters studies, (not restricted to water drinking supplies).

10.5.5 Private On-site Sewage Systems and Wastewater Facilities

I agree with this section.

Replace The Municipality “may” with shall’

I-57 the provisions of this sub-section should apply to on-site sewage disposable systems municipality wide not just as shown on Map 4.

Add to b) be maintained “to include pumping out of septic tanks on a 3 to 5 year basis”.

- c) HRM shall provide financial assistance for maintenance if required (pump out of septic tanks and field replacement).

Comment:

I feel that the Regional Plan should address the concept of By-right Development in all districts. Should it be allowed today?

Given that very large sub-divisions are now being constructed and developed, (e.g. Bedford West- 1,200 acres and Indigo Shores - 1,800 acres), some are given extensive Public Consultations, others, not so much.

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