



**Sandy Lake - Sackville River Regional Park Coalition**  
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December 1, 2025

**Subject: Sandy Lake Special Planning Area, Public Engagement Process**

Dear Melissa,

Thank you for the open house opportunity to view and comment on the plans being considered for the Province's Sandy Lake Special Planning Area.

With a valuable park at risk, this is a special situation requiring special attention, allowances, and possibly unusual actions.

The Sandy Lake-Sackville River Regional Park Coalition of 31 local, regional and provincial groups requests that Sandy Lake be removed from the SPA list.

Compromise is often seen as a solution to politicians, but in this case that would be disastrous for the park. Decision-makers in Bedford Town Council were apparently not aware of that when they voted by a close margin in 1982 to zone about half of the previously intended park lands, a functioning ecological unit, for future housing. Reliable sources from that event confirm that no biologists were consulted

before the decision was taken, a decision based on an apparent belief that lands were merely real estate, not crucial to the lakes' and park's health. It is not too late to fix that error.

Further, in the 2006 and 2014 Regional Plans the Sandy Lake area was documented in two sections of the RP as having dual, competing, values, in one for potential housing and in the parks section, as a park being actively grown by the city.

This conflict was also mapped in the Halifax Green Network Plan values map, along with recognition for the need to resolve the conflict. We were assured that the city was aware of the conflicting values and would resolve them in the 2020 RP process.

It appeared that Council's strong motion to strengthen the buffers, old growth forest and wildlife corridor protection was a clear sign that the city was working to resolve the values conflict. That motion was included verbatim in the RFP (and we understand also in the contract) for the LSA studies. It shows up several times in key city documents such as in the Feb 4 and April 29 2025 in-camera declassified reports.

The McCallum Report had made strong points that special protections for forests and wildlife corridors, large buffers, and other extraordinary environmental protections are needed in the watershed of Sandy Lake. However, looking at the developers' maps we have seen so far, in the 2020 RP application, the LSA reports, and the recent map shown at the open house, minimal attention to riparian buffers, wetland and stream protection, and to wildlife corridors is apparent. Business as usual will not end well for a sensitive lake and system through to the Sackville River, and will lead to degradation of this treasured Regional Park.

We request that HRM and the Province recognize this serious situation, and work together to choose to protect the park above all else. Put the needed housing in a more sensible place.

Remove Sandy Lake from the SPA list and work to fulfil the goal of a strong and resilient Regional Park that serves the natural and recreational needs of a growing public.

Among our specific concerns are these:

- 1. New maps 'out of left field'.** At the open house, it was a surprise to see how different the developer's plans were from the plan used in the Regional Plan submission and for the background studies. We note a passage in the Stantec report that said the studies were relevant only to the parameters specified for the LSA studies. But suddenly, the map has changed. The developer maps at the open house were an extreme variation that lacked relation to the previous maps and lacked reflection of recommendations in the Stantec Report.

Note there were also marked deficiencies in the Stantec Report that need to be remedied before any decision to build, or not. Stantec stated extreme weather events and time constraints prevented them from doing the full evaluations they would normally do.

- 2. The Stantec Report did not analyse potential impacts on Sandy Lake Regional Park despite this requirement in the background studies.**

Sandy Lake Regional Park (owned by HRM) would be impacted by development in the Sandy Lake's headwaters. If water quality of the lake continues to deteriorate, which can be accelerated by housing development next to the lake, then the HRM beach at Sandy Lake Regional Park may be closed to swimming more often due to blue-green algae blooms. Wildlife and plants in the park, that contribute to its ecological functions and recreational quality, could be driven away by the destruction of their habitat in the proposed development area. Recreational characteristics that are currently assets of the park, including the quiet that can be experienced in the park's forest, may be diminished by adjacent development. All of these things and more are relevant to HRM assessing the potential impacts of development on their park assets, and this examination was directed in the scope of the study (Request for Proposals), yet they were not studied.

- 3. Despite HRM Council's motion regarding the Sandy Lake Environmental Features Assessment (a.k.a. the McCallum report) to increase buffer sizes, protect wetlands, wildlife corridors, and old growth forests being included verbatim in the RFP, the LSA contract, and the declassified Council documents of February 4, 2025 and April 29, 2025, no serious consideration or use of this appeared either in the Stantec Report or in the maps presented by the developers.**

The Request for Proposals for the background studies specified that the consulting company must "review and use the findings of the [Sandy Lake Environmental Features Assessment](#) in background studies." This was not done. The Sandy Lake Environmental Features Assessment provided data specific to Sandy Lake's situation that could inform the background studies, including mapping areas with sensitive environmental features. And it recommended at least a 50m buffer next to wetlands and a 100m buffer next to watercourses in this special case. These recommendations were endorsed in a [motion by HRM Council in 2022](#), yet this assessment and Council motion were ignored in the background studies, and further in the open house maps.

- 4. Several, relevant reports and datasets were not included in the background studies, despite the requirement to do so in the RFP. This must be rectified.**

Multiple studies by consulting companies, academics, and community researchers were ignored in the background studies even though these sources of information were sent to the consulting company and HRM. Missing studies included long-term lake water quality testing results for Sandy Lake, and reports on Species at Risk and wildlife corridors at Sandy Lake – all were topics included in the background studies, but used minimal information compared to what was available for inclusion.

**The watershed and stormwater management background studies drew conclusions about impacts to Sandy Lake while ignoring relevant data.**

A deep-dive analysis by retired Dalhousie biology professor and researcher Dr. David Patriquin of the watershed and stormwater management background studies demonstrates that there are 3 major flaws with this work:

- i. The background studies did not include longer-term water quality data for Sandy Lake, gathered by multiple researchers and through citizen-based science. The background studies limited themselves to recent lake water quality sampling conducted by the

consultant only. This intentional ignoring of longer-term lake water quality data led the background studies to miss seeing the existing decline in water quality, which would be worsened by development next to the lake.

- ii. Ignoring the longer-term lake water quality data for Sandy Lake has additional ramifications, including that longer-term data shows very low deep water oxygen levels, and internal phosphorus loading, both of which could be exacerbated by development next to the lake.
- iii. Current development scenarios show a plan to build in the most sensitive area of the subwatershed (west and south sides of Sandy Lake where the lake's tributaries are located). A more accurate understanding of Sandy Lake's current water quality plus potential impacts of development could have led to recommendations not to develop in the headwaters of Sandy Lake, which is where development is currently proposed.

For a further explanation of the extreme flaws in the Sandy Lake water quality section of the background studies see Dr. Patriquin's "[Community Studies for Sandy Lake \(Bedford, NS\) Special Planning Area "ignore" critical data on water quality 25Jul2025](#)"

### **Wildlife corridors mapping is incomplete, incorrect, and did not inform concurrent background studies**

The Sandy Lake – Sackville Rivers area contains wildlife corridors that are vital for wildlife movement in the region between the Mainland Nova Scotia and the Chebucto Peninsula. Three different wildlife corridor research reports have provided evidence as to where wildlife corridors need to be preserved in the Sandy Lake Special Planning area. The background studies use some of this research to propose wildlife corridors in the area, yet two problems remain. The minimum wildlife corridor width of 100m wide is incorrectly mapped and recommended as 100m on top of a watercourse, which then creates only a 50m width terrestrial corridor on each side of a watercourse (not adequate for animals and plants that do not cross over water and that require 100m). Secondly, the mapping and rationale for wildlife corridors is then ignored in all the other background studies on traffic and infrastructure. In those reports, mapping and recommendations proceed with no wildlife corridors involved.

### **5. The Stantec traffic study found that even in a “no development” scenario, traffic on Hammonds Plains Road becomes untenable.**

The Stantec traffic modeling examined 2 development scenarios and their impacts on local and regional traffic. Even in the scenario where no development proceeds at Sandy Lake, the traffic models showed “significant increase in existing congestion by the 2031” on Hammonds Plains Road and Larry Uteck Boulevard. Congestion will be worse at a larger scale too – traffic modeling showed road capacity “on Highway 102 into Halifax will exceed 100 percent by 2031, characterized by severe congestion even before the Sandy Lake development is introduced.” With the proposed development built out, the traffic modeling projects 20,000 more car and transit trips per day in and out of the Sandy Lake Special Planning Area! The traffic modeling from the background studies shows it would get much worse if development happened at Sandy Lake.

During the fall 2024 election the Province announced a "Sandy Lake connector" road could be built in the area, but that may not solve the situation. Developers told us at the open house that "the JRTA studied it and included it". We have not seen this in the JRTA report that we have. Is there another JRTA Report that supports this claim? As well, traffic planners have been interviewed on media cautioning that more roads actually means more traffic - that traffic will flow into Hammonds Plains as well as flowing out. Credible studies should be done about any proposed "Sandy Lake connector road" that would look at its potential to alleviate traffic, and also its potential impacts of running through the woods and waters at Sandy Lake.

6. **It is vital that a full study be completed that examines the potential flooding risk on the lower Sackville River** that is based on the proposed development scenarios within the Sandy Lake Special Planning Area. The Sackville River floods. It impacts homes, businesses, infrastructure, and more in the floodplain of the Sackville River, specifically in Bedford and Lower Sackville. In 2023 a flood on the lower Sackville River caused substantial damage. Rivers like the Sackville River flood more extensively when forested land in the watershed is converted to hard surfaces, such as the roads and houses in housing developments. The Sandy Lake subwatershed is the largest subwatershed in the Sackville River watershed. How water moves through the Sandy Lake subwatershed could have a profound effect on flooding downstream. It is imperative that the potential increased flood risk to the lower Sackville River be known before development decisions are made.
7. **It will cost taxpayers more than usual.** The background studies about potential development at Sandy Lake show a low estimate of \$130 million in direct infrastructure costs to HRM and Halifax Water to support the developer's plan for Sandy Lake (that does not include an additional \$83 million in shared costs). Subsidizing suburban sprawl is an expensive form of development, causing increases in taxes for everyone. There are less expensive places to build. We all need to see the comparison report yet comparing the 4 background studies areas to inform whether caution is warranted regarding large scale spending in a location such as Sandy Lake.
8. **This process is anti-democratic.** We appreciated HRM's efforts to include as many aspects of a normal public engagement process as possible, given the constraints to the processes being applied by the Province's rush to develop at all costs. The Province taking over decision-making about development at Sandy Lake leaves out important parts of municipal democracy. Done in this way, there will be no decision by HRM Council about development, and no public hearing about the development. Citizens who normally engage with Council through recognized processes are left out with no direct access to the Minister or Premier who will decide the fate of SPAs. As mentioned before, Sandy Lake's is a special situation involving serious risks to the Regional Park. What citizens want to see for their park should matter, yet so far, the Province seems to see the Sandy Lake watershed as nothing more than some real estate that developers own and could develop to create housing.

We hear government, including the Dept of Environment, MLAs, others, repeating the developer's claims that they know how to build beside lakes without harming them. Frankly, that is magical thinking. Look at lakes that have recently been developed, but take biologists with you to point out the truth of environmental impacts. If the city and Province believe that claim, then Sandy Lake, Marsh Lake, the

Regional Park will be a shadow of its former self, and decision-makers will have contributed to that tragedy.

It must be recognized that compromise won't work here. For example, the already precarious water quality situation needs the support of the 12-year-old trees that are now regrowing after the 300-acre 2013 clear-cut and are already beginning to provide the water system with natural protections. Q: When is the best time to plant a tree? "Ten years ago!" These trees are already there and doing their job.

The Coalition does not support any development at Sandy Lake because of the multiple concerns just listed. Decades of work and investments by citizens, organizations such as SLCA and the Sackville Rivers Association, and by the city, to build a strong, workable Regional Park, will be for nothing should further development be allowed in the Sandy Lake subwatershed.

We need to choose as a society to protect the valuable ecological assets at Sandy Lake-Sackville River, as was recommended in the 1971-79 MAPC park plan which identified and respected the fact that what happens in the tributaries and extended watershed of Sandy Lake, the headwaters of the system, will affect the balance and welfare of the entire park system through to the Sackville River.

The Province should remove Sandy Lake from the Special Planning Area list, allowing it to revert to an 'area for consideration' as described in the 2006 RP, through HRM planning only.

Work with the developers to find a win-win which allows the long-intended park to acquire all of the lands and waters it needs to flourish. All involved in such an accomplishment would be heroes for all time.

We ask the city to play its part in making sure the Province removes Sandy Lake from its SPA list and instead builds a magnificent park with the community and for the community, for researchers and education programs to continue, for health and recreation benefits, and to continue to reap the ecological assets that help fight climate change and biodiversity loss.

What happens will determine whether Sandy Lake Regional Park continues to be a rich, vibrant asset, or whether it becomes a piece of geography - a "park" with poor ecological assets and algae blooms at the beach.

We can put houses elsewhere. There will always be more housing opportunities coming on tap when the developers finish the ones they are building now. There will always be other housing opportunities.

Sincerely,

Original signed

Walter Regan and Karen Robinson

Co-chairs, Sandy Lake Sackville River Regional Park Coalition of 31 groups

**Sandy Lake - Sackville River Regional Park Coalition Member Groups:**

*Sandy Lake Conservation Association*

*Sackville Rivers Association*

*Agropur Cooperative Dairy Bedford Plant*

*Canadian Parks and Wilderness Society - Nova Scotia Chapter*

*Canoe/Kayak Nova Scotia*

*CAPE NS (Canadian Association of Physicians for the Environment)*

*CARP Nova Scotia Chapter*

*Council of Canadians - Halifax Chapter*

*Cole Harbour Parks and Trails Association*

*CP Allen High School's Cheetahs for Change*

*Ecology Action Centre*

*Five Bridges Wilderness Heritage Trust*

*Friends of Blue Mountain Birch Cove Lakes Society*

*Friends of McNabs Island Society*

*Friends of Nature*

*Halifax Hares Trail Running Group*

*Halifax North West Trails Association*

*Kingswood Ratepayers Association*

*Lucasville Community Association*

*Lucasville Greenway Society*

*McIntosh Run Watershed Association*

*Mountain Bike Halifax*

*Nature Nova Scotia*

*Nova Scotia Bird Society*

*Nova Scotia Salmon Association*

*Nova Scotia Wild Flora Society*

*Scott Manor House*

*St. Margaret's Bay Stewardship Association*

*The Halifax Field Naturalists*

*The Neighbourhood Association of Uplands Park*

*The Turtle Patrol*

*WRWEO / The Bluff Wilderness Hiking Trail*