



Sandy Lake Conservation Association

115 Farmers Dairy Lane, Bedford, B4B 2C9

www.sandylake.org

To:

Mayor Fillmore

Members of Halifax Regional Council

Halifax Planning Staff

regionalplan@halifax.ca and clerks@halifax.ca

From: Sandy Lake Conservation Association

Re: Feedback on Proposed Amendments to the Regional Plan

October 24, 2025

Dear Mayor Fillmore, Members of Council, and HRM Planning Staff,

The Sandy Lake Conservation Association is a group of citizens which works to preserve the outstanding environmental and recreational assets of Sandy Lake Regional Park and area.

We appreciate the opportunity to comment on the proposed amendments to the Regional Plan.

While we recognize and support the need to address the housing crisis, putting housing as intended at Sandy Lake SPA will unquestionably harm not only the lakes and park but can be expected to cause more flooding in the Sackville River floodplains of Bedford and Sackville.

The Stantec LSA report on Sandy Lake does not measure up to the expected quality of work from Stantec. It reflects very little of the real-life long-term scientific and cultural information and data that exists and that should have been used to inform the decision on whether to proceed or not with secondary planning in such an important place. The Stantec Report is hardly similar to the McCallum Report, hardly uses it. We also note the substantial investments in the park's creation over many decades by the municipality, citizens, groups, businesses, and governments.

One of the few Regional Plan changes which would have at least helped was the new 30-metre buffer plan. However, even that didn't come near the size of buffers that the McCallum Report recommended for protection of the park's valuable assets (50-metre for wetlands and 100-metre for watercourses). The McCallum Report was specifically a study on the needs of Sandy Lake's system through to the Sackville River. There needs to be a provision in the Regional Plan to allow for the results of special studies of particular areas to hold more weight than the general Regional Plan requirement of 30 metres.

City Council voted in favour of the 50 and 100-metre buffers for Sandy Lake area specifically, but the Stantec Report reverted to the 30-metre buffers. Outstanding ecologies like Sandy Lake are the filters and lungs of the province.

In addition, the developers of Bedford West already used 30-metre buffers, and developers voiced the expectation they would be continuing those in Subareas 12 & 1 - another SPA in Sandy Lake's subwatershed that will impact Sandy Lake and its park.

At Sandy Lake we have had two recent examples of how 20-metre buffers have not worked.

- In 2013 300 acres of trees were cut beside Sandy Lake following the required regulations, including 20-metre buffers. However, there is still a large area of rotting wood chips slowly decomposing at the mouth of one of the western tributaries. It has been increasing the nutrient load in Sandy Lake since that tree cutting.
- In 2024 siltation of another of the western Sandy Lake tributaries, Northern Brook, demonstrate how inadequate buffers are and how development pressures lead to corner-cutting of minimum requirements. Bedford's office of NS Department of ECC handled the issue.

It makes no sense in the midst of wildfires from climate change to destroy those natural environmental services. We can put houses elsewhere. Larger buffers are not barriers to development, they are safeguards that protect homes, businesses, infrastructure and communities. They protect tax dollars and citizen's dollars from the intensifying climate impacts such as flooding, fires and droughts.

We can send you research that shows 30-metre and sometimes greater buffers are warranted and used in some parts of the world. The world is going in that direction, not backward to 20-metres, and Sandy Lake needs more than that, not less.

REQUEST:

SLCA requests that HRM use the 2025 Regional Plan as created by the full process, create an amendment to the 2025 Regional Plan a special category for protection from larger buffers in locations like Sandy Lake that have particular vulnerabilities and assets that warrant that protection, and reinstate the 30-metre buffers for the usual development processes.

2. Our other main concern is that the Province's 'taking over' the Regional Plan is yet another heavy-handed act that challenges democracy. We ask the city to stand behind its citizens and its years of work to create the best city we can, to resist this undemocratic movement that is undermining years of public engagement, expert input, and evidence-based planning that went into the 2025 Regional Plan. When experts and citizens have worked a decade together to shape the Regional Plan by all, for all, to have the joint work swept away like that is stunning to say the least.

REQUEST:

We request that the city stand up to the province, use the 2025 Regional Plan that you passed.

Respectfully submitted,

Karen Robinson for The Sandy Lake Conservation Association
www.sandylake.org