



To: Mayor Fillmore, Members of Halifax Regional Council, and Planning Staff
From: Ecology Action Centre
CC: Maggy Burns, Executive Director
Re: Feedback on Proposed Amendments to the Regional Plan

The Ecology Action Centre (EAC) appreciates the opportunity to provide feedback on the updates and amendments to the Regional Plan. The amendments presented are not, in themselves, entirely harmful. The objective and vision statement show a clear intention to build complete communities. However, the exclusion of five years of public consultation feedback, along with the omission of policies from the 2025 version that once embedded climate action, environmental protection, and ecosystem-based planning, represents a major step backward. The reduction of 30-metre buffers to 20-metre buffers for wetlands, watercourses, and coasts, the absence of bird-friendly design measures, a lack of consideration for ecological corridors and the loss of explicit connections to HalifACT and the Halifax Green Network Plan – two of the municipality's most important and widely supported environmental frameworks – undermine the credibility and effectiveness of the Regional Plan.

The following letter outlines our feedback on the amendments presented, as well as addresses several elements of the 2025 version of the Regional Plan that need to be reinstated. It is possible to address the housing crisis and maintain strong policies that support the wellbeing of community and environment. The housing crisis is about more than just supply – it is about building complete communities that work in harmony with our natural environment.

Section 1: Feedback on the Amendments to the Regional Plan

6.0B Suburban Area Secondary Municipal Planning Strategy

Objective 4 under Section 6.1B rightly commits to “increasing housing supply and the mix of housing types available for people of all ages, abilities and income levels, with access to transit, services, and amenities.” This is a strong and necessary objective that reflects the complexity of the housing crisis. However, the lack of objectives to address equitable access to green, blue and open spaces for community is a glaring gap in the strength of this document. The objectives should include a point committing to community access to green, blue and open spaces, which has direct impact on the mental and physical health and wellbeing of residents.

It is also important to note this objective directly conflicts with Minimum Planning Requirements (MPRs) H and J, which remove requirements for unit mix and for ground-floor commercial space.

These changes move us away from the complete community principles listed in Objective 4 and toward homogenous, car-dependent developments. To make Objective 4 achievable, MPRs H and J must be reworked or removed. Without doing so, we are setting the plan up for failure.

The vision statement outlined in Section 6.2.1B presents an excellent aspiration for “urban communities centred around a network of parks and trails, beautiful, walkable, and vibrant centres.” Yet the forced inclusion of Special Planning Areas (SPAs) in our municipal planning strategy directly contradicts this vision.

The Sandy Lake and Highway 102 West Corridor (Blue Mountain-Birch Cove Lakes) SPAs are both outside the Urban Service Boundary. Extending municipal services to these areas will come at a significant cost to taxpayers. These are greenfield sites that lack existing infrastructure to support complete communities, meaning residents will rely heavily on cars. This will lead to worsening traffic congestion on Highways 101, 102, Hammonds Plains Road, and the Bedford Highway, already some of the municipality’s most overburdened routes. These developments will increase maintenance costs, emissions, and infrastructure debt, all while undermining the vision of accessible, transit-supported growth.

From an environmental and fiscal perspective, greenfield development is the most expensive and least sustainable form of growth. Healthy, intact natural systems, such as forests and wetlands, provide invaluable ecosystem services. They store carbon, filter water and air, reduce heat island effects, and act as natural buffers against floods and wildfires. Once lost, these systems cannot be easily or affordably replaced.

The **Blue Mountain–Birch Cove Lakes** area, specifically, is being considered for designation as a National Urban Park (NUP). This project would bring enormous tourism, recreation, and community well-being benefits to the HRM. This proposed SPA lies directly within the aspirational boundary of the NUP. It would be a grave misstep to advance any development here before joint planning by the federal, provincial, municipal and First National governments for the park is complete. At minimum, this site should be placed under a permanent pause, if not removed entirely from development consideration.

At **Sandy Lake**, 15 rare and endangered species have already been documented, alongside pockets of old-growth forest, which currently make up less than one percent of the province’s forests. The lake and streams support the endangered Atlantic salmon, a species highly sensitive to water quality. Development at the lake’s headwaters will irrevocably harm this habitat, thus placing further pressure on a threatened, important species in our province.



6.4B – Addressing the Housing Crisis

Several amended sections of the plan state that, “given the present housing shortage, the urgent priority is to increase the supply of safe, sustainable, and affordable housing” (Sections 1.3, 3.1, 3.1A, 6.2.2A, 6.2.2B, and 6.4B) This is also Minimum Planning Requirement B from the province. However, “safe,” “sustainable,” and “affordable” remain undefined, rendering this statement meaningless in practice. Furthermore, development agreements that make promises to address these undefined terms could risk being fast-tracked without any way to ensure they are delivering.

Without measurable definitions, this policy risks fast-tracking projects that do not meet the needs of those most impacted by the housing crisis: low- and middle-income residents and families. It is imperative that these terms be defined and strongly tied to metrics that plan to address housing for our most vulnerable populations.

The housing crisis cannot be solved by supply alone. We must ensure that new housing contributes to complete, climate-resilient, and socially inclusive communities. Approval of development agreements should be tied to tangible social and environmental outcomes, not just speed of delivery.

6.4B Transit-Oriented Suburban Opportunity Sites

We appreciate that policy SA-2B includes requirements for transit accessibility and discourages demolition of usable buildings – these are commendable, sustainable practices. However, there is a glaring omission: **no protection for green, blue and open spaces**. Development near existing transit corridors should focus first on brownfield and underutilized lands, not ecologically valuable greenspaces.

Policy SA-3B outlines several good criteria aligned with complete community principles, but again lacks language ensuring that developments avoid or minimize environmental harm. Future policy must explicitly prioritize projects that:

- Are within the Urban Service Boundary;
- Include a strong unit mix and affordable housing;
- Provide ground-floor commercial opportunities; and
- Demonstrate low-impact, environmentally responsible design.

These priorities should also influence which development agreements are advanced first.

As a point for clarity: **Policy SA-2B** allows development agreements within an “800-metre walkshed” of Bus Rapid Transit routes. This term must be clearly defined: does it refer to straight-line distance, or to actual walkable routes along existing or planned pedestrian infrastructure?



Clarity is essential for both the public and Council to understand how these decisions are being applied.

3.3.2 – Opportunity Growth Sites

The proposed Opportunity Growth Sites cannot all proceed simultaneously given current infrastructure and fiscal constraints. We urge HRM to make transparent how these sites will be prioritized. Projects with existing servicing, affordable housing commitments, and low ecological impact should come first. Development must follow infrastructure, not the other way around.

Section 2: Feedback on Omissions and Removals

Several critical environmental policies from the 2025 Regional Plan draft, specifically from **Chapter 6: Protecting the Environment and Acting on Climate**, must be reinstated.

- **EN-1:** When preparing business plans and programs, the Municipality shall consider *HalifACT*.
- **EN-4:** When preparing business plans and programs, the Municipality may consider the *Halifax Green Network Plan*.
- **EN-12:** When preparing business plans and programs, the Municipality may consider the *Urban Forest Management Plan*.

These policies are strong ways to align HRM's land-use planning with its declared climate and biodiversity goals, as outlined by all three priority plans. The Regional Plan must explicitly reference these frameworks and integrate them into both the Regional and Suburban Plans. Council and staff have done respectable, quality work on all of these plans, and they are essential for protecting both community and environment as we continue to grow to a city of a million people.

EN-7, which required HRM to identify opportunities to maintain or improve ecological connectivity, must also return. Ecological corridors allow species movement, genetic exchange, and resilience against habitat fragmentation. As HRM grows, we will inevitably expand outward, but we can and must do so in ways that best preserve ecological function. Growth that ignores connectivity will degrade biodiversity, increase our vulnerability to climate-related disasters, and diminish quality of life for residents.

EN-14, promoting *bird-safe design*, is another easy and meaningful inclusion. Measures such as window treatments, lighting design, and landscaping choices, are low-cost, high-impact interventions that save thousands of birds annually and improve local ecological health.



Importantly, they do not impede housing delivery and are entirely compatible with rapid development. The CSA standard for bird-friendly building design has been used effectively by developers across Canada and is already incentivised or required by multiple Canadian municipalities.

30m Buffers for Wetlands, Watercourses and Coasts

Finally, policies **EN-34** and **EN-47**, which establish **30-metre minimum riparian buffers** along wetlands, watercourses, and coasts, must be reinstated without delay. These buffers are not ornamental “nice to haves”; they are fundamental to protecting our built environment. Riparian buffers filter pollutants, stabilize soil, prevent erosion, and absorb floodwaters, directly safeguarding nearby development and infrastructure.

No developer wants to be responsible for a subdivision that floods or loses shoreline integrity. The 30-metre standard is based on decades of research and best practice across North America. If there is evidence that these buffers have significantly limited housing supply without providing clear environmental benefits, we ask that it be presented publicly. Absent such evidence, their reduction is unjustified.

The province’s decision to discard the Coastal Protection Act placed responsibility for coastal management squarely on municipalities. In the 2025 Regional Plan, the 30-metre coastal buffer was HRM’s way of exercising that responsibility. Removing it now leaves our coastlines and our residents unprotected. We call for its reinstatement in both the Regional and Suburban Plans.

Our Recommendations

1. **Request that the province remove or amend MPRs H and J**, which currently inhibit HRM’s ability to build complete communities. If this is not possible, HRM should instead prioritize and incentivize developments that align with MPR B and complete community principles.
2. **Define “safe, affordable, and sustainable housing”** in measurable terms, with outcomes and indicators to track progress and accountability.
3. **Include an objective in 6.1B that demonstrates clear intent to protect our natural environment** and open spaces as we continue to make growth decisions about our suburban area.
4. **Publish a transparent prioritization framework** for Growth Opportunity Sites and SPAs. Prioritize projects on brownfield sites, within the urban service boundary, near existing infrastructure, and with affordable housing commitments.
5. **Reinstate intent to align with HalifACT, the Halifax Green Network Plan, and the Urban Forest Management Plan** and bird-friendly design in both the Regional and Suburban Plans.



6. **Reinstate 30-metre buffers** for wetlands, watercourses, and coasts across the municipality, consistent with best practice and the 2025 Regional Plan.
7. **Prioritize ecological corridors in all future growth planning.** Growth areas should favour brownfield sites first, then low-ecological-value greenfield sites only where unavoidable and outside identified corridors.

The Ecology Action Centre recognizes and sincerely appreciates the hard work of HRM staff and Council in developing this plan amid significant provincial overreach. It has not been an easy planning environment, and we commend the continued dedication to building a plan that serves the best interests of residents and our shared environment.

Halifax now has a real opportunity to lead as a city that balances affordability and accessibility with strong environmental and community principles. We can meet housing needs while strengthening complete community principles and protecting the ecosystems, parks, and green corridors that make our municipality such a wonderful place to live.

We all share the same goal: to see our city grow sustainably, affordably, and safely. We believe the recommendations outlined in this letter will help make those goals possible, ensuring the Regional Plan remains both climate-ready and community-focused.

Thank you again for your commitment and effort in this important work on our Regional Plan. We look forward to seeing these amendments strengthened, as well as the continued progress on the Suburban Plan as we continue to work towards a municipality we are all proud to live in.

Sincerely,

The Ecology Action Centre

