



October 24, 2023

David Paterson
Regional Planning Team, Planning and Development
Halifax Regional Municipality

Delivered via email

Dear Mr. Paterson,

Re: Submission to Regional Plan Review Process (Phase 4) Friends of Blue Mountain-Birch Cove Lakes Society

The following comments are provided in reference to the Phase 4 regional plan review document on behalf of the Friends of Blue Mountain-Birch Cove Lakes (BMBCL) Society.

The Phase 4 document contents are wide-ranging with many aspects of interest and relevance to our organization; however, consistent with our primary mandate of advocating for successful park establishment, comments that follow focus specifically on issues relating to the need for both an appropriate park plan (including proposed boundary and/or aspirational boundary options) and complementary land use planning (including supportive zoning and development controls) for adjoining currently undeveloped lands.

With the BMBCL area gaining status and standing as a candidate national urban park, the ongoing regional plan review process should and must recognize this park initiative as a first-order city-building opportunity that demands priority attention in HRM's regional plan.

The BMBCL area was first recognized formally as a regional park proposal (i.e. 'conceptual park area') in HRM's 2006 regional plan, and reaffirmed in the 2014 plan update and again by unanimous decision of the current council in December 2021. The July 2021 collaboration agreement between HRM and Parks Canada elevated the BMBCL area's status to that of a proposed national urban park candidate, with its formal candidacy being confirmed by a public announcement on May 23rd of this year.

Unfortunately, neither of the park planning or regional planning initiatives now in progress are giving the BMBCL candidate national urban park the focus and attention it deserves, and in fact is required to achieve the successful establishment of a viable park management unit. The importance and urgency of this need is underlined by the overriding priority that has been placed on residential development in response to Halifax's housing crisis, and the consequent progressive infringement of development on the park area's margins and corresponding limitation of potential park establishment opportunities and options.



The recently initiated park planning process is being limited to apply solely to lands owned by the members of the national urban park partner group while steadfastly ignoring abutting and surrounding lands. Currently, the partner group members (HRM, DECC, NSNT, Parks Canada and Mi'kmaq representatives) collectively own 5500 acres dedicated for park or conservation use within an undeveloped area of approximately 12,000 acres. Limiting park planning to an area defined by arbitrary property lines ignores the character and quality of the underlying land and water base, cross-boundary ecological relationships, adjoining areas of recreational potential and desirable park access opportunities – all of which should be considered as a rationale for recommended land acquisition to consolidate a coherent park management unit.

The Phase 4 regional planning document similarly focuses narrowly on lands owned by the partners and, reiterating the approach being taken regarding park planning, unfortunately, ignores and abandons the more reasonable approach (as taken in the 2006 regional plan and 2014 plan update and the 2021 direction of Council), to highlight and plan toward a 'conceptual park area', essentially as an aspirational vision or goal. Phase 4 does refer to the possibility of additional lands being acquired "for the purpose of connection or park integration" (whatever that may be intended to mean?), but, with the park planning process (as set out explicitly in the corresponding RFP) limiting the planning effort to existing partner-owned lands, there is no process in place to propose additional lands for acquisition – unless through advocacy by stakeholders or random offer of sale (or donation) by an individual landowner.

Regarding lands outside the partner-owned park or conservation lands in the BMBCL area, Phase 4 includes the following vague statement – "As development proceeds in close proximity to park areas (i.e. referring to 'nature parks', including BMBCL), attention should be placed on ensuring land use is of suitable use and scale." Also, although policies CI-3 and CI-5 indicate that park planning "shall consider" adjacent lands and 'acquisition models' and that land use planning for areas in close proximity to parks "shall" be studied to "ensure land use is of suitable use and scale", there are no mechanisms identified through which suggested outcomes would be achieved. In fact, as noted, the park planning approach underway is expressly limited to partner-owned lands.

The RFP for the ongoing Highway 102 West Corridor pre-development study describes the study area as being "located east of BMBCL Regional Park" and, although there are references to considering relationships and impacts with respect to the park, the implication is that the park and pre-development study areas are separate and apart. This is concerning because the 'conceptual park area', now omitted from the Phase 4 document, clearly overlaps directly and substantially with the 102 West Corridor lands and, as noted above, because Council gave clear direction (on December 7, 2021) that park planning for BMBCL be "based on consideration of" the conceptual park boundary (or conceptual park area) "as represented on Map 11 of the Regional Municipal Planning Strategy".

In light of the preceding considerations, Friends of BMBCL will be soon advancing a map showing boundary options for the future BMBCL National Urban Park, will continue to engage as effectively as possible with the ongoing partner-led park planning process and will seek to



engage further with the regional plan review team to explore land use planning and development control options for lands surrounding the park. Although the park at large is of overall interest, particular areas of concern in reference to imminent decisions relating to development encroachment are the Highway 102 West Corridor area and lands surrounding Maple and Upper Sheldrake lakes (including nearby undeveloped lands in the vicinity of Haliburton Hills and Highland Park subdivisions).

The Friends of BMBCL look forward to further progress toward the successful establishment of BMBCL National Urban Park through the inclusion of supporting policies in HRM's Regional Plan (Phase 5).

Regards,

Mary Ann McGrath

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Chairperson
Friends of Blue Mountain-Birch Cove Lakes