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re: Density Bonus Bill

To Members of the Legislative Committee

HRM should not have the ability to award a density bonus in exchange for affordable housing units (or other perks).

1. This will remove from established neighbourhoods and other concerned parties the right to have a say in what is built in their communities. The decision to allow a greater number of units, which will allow greater heights and/or greater lot coverage will be made by planners and developers, not through the usual development agreement/public hearing process which gives the community some control over what developers are doing.

The zoning in a neighbourhood is a contract between the property owners and the city. Property owners make decisions based on the zoning and changes should only be made with due process. The density bonus option will extinguish that process and override the rights of other property owners.

2. What constitutes 'affordable housing' in the eyes of a developer will reflect the price at which he can still turn a profit, not meet community needs. I believe CMHC has a definition, which I think most developers would find too restrictive.

Unit size is also important. Units for families are needed but it can be much more profitable for a developer to include four bachelor apartments rather than one three bedroom that could accommodate a family of four. Only existing housing agencies with a long history in the housing market have the knowledge to make decisions on the size of units needed to meet the needs of the community.

3. Unless a developer agrees to immediately turn the affordable units over to Metro Non-Profit Housing to administer in perpetuity there is no guarantee that the units will not 'disappear' in a couple of years. At the same time, the developer will have the extra units and the extra income long after the units are initially rented. There is no enforcement agency that has either the power or the budget to enforce the rental of these units. They should be turned over to an experienced housing agency.

4. The most economical housing is the housing that is already in place. New building costs make a genuinely 'affordable' target impossible. Providing an incentive for developers to tear down older housing in exchange for a vague promise that there will be affordable units is counter productive.

5. There is a huge amount of developable land in central HRM. There is no need to give developers bonuses or any kind.

There are far too many loopholes and economic disadvantages and a lack of democratic process in allowing the development community to build bigger buildings to gain (but probably not keep) a few so-called affordable units.

Thank you,

Beverly W. Miller