

WRITTEN SUBMISSION BY GPI ATLANTIC TO
HALIFAX REGIONAL MUNICIPALITY COUNCIL

RE: HRM BY DESIGN

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HRM by Design Public Hearing
Written submission by GPI Atlantic

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Genuine Progress Index (GPI) Atlantic—a Halifax-based non-profit research group dedicated to measuring the social, economic, and environmental dimensions of progress—would like to thank Council for this opportunity to comment on some key issues regarding the HRM by Design Plan for downtown Halifax. In particular, GPI Atlantic has one major concern that is summarized here and discussed in further detail below. While the overall stated intention of the HRM by Design Plan to encourage densification of the downtown area with emphasis on walkability and quality design is laudable from both sustainability and development perspectives, it is premature for Council to adopt the Plan without first undertaking a proper impact study and analysis, from a full-cost accounting perspective, of the potential development consequences of the Plan. Without fully and properly addressing the potential impacts of this targeted development on the downtown core, there is a danger of unleashing a process that may undercut and undermine the positive and praiseworthy stated intention of the document. Indeed, without a full impact study, it is simply not possible to establish that residential and commercial growth of the magnitude and type envisioned is sustainable.

For example, with regard to transportation in particular—a key component of the Nova Scotia Genuine Progress Index (GPI) for which GPI Atlantic recently developed a separate HRM-specific transportation study—the foundational HRM documents have yet to be completed. Thus HRM's Transportation Master Plan—which itself will be comprised of five key Functional Plans—does, encouragingly, promise and intend to deal effectively with sustainable transportation issues, including improving public transit, active transportation, and transportation demand management.

But this TMP has not yet been fully developed and integrated into the overall HRM by Design Plan, with only the active transportation and parking functional plans so far completed and approved by Council. The public transit functional plan has yet to be tabled with Council and the all-important transportation demand management functional plan and road and road network functional plan are still under development, though these are arguably among the most important documents required to assess the transportation impacts of HRM by Design.



And yet, the HRM by Design Plan targets the downtown for “significant” residential and commercial growth, which may well translate into a significant increase in vehicular traffic in the downtown area unless a coherent and fully developed transportation plan spells out in detail how that growth can be accommodated sustainably and without increasing traffic.

GPI Atlantic’s detailed 2008 study of HRM’s transportation system (see <http://www.gpiatlantic.org/pdf/transportation/hrmtransportation.pdf>) concluded, from all the evidence examined, that the system is currently unsustainable—a perception we know is widely shared both by Council and residents. For example, one widely reported result from the 2008 GPI report was that rush-hour congestion on key HRM arteries alone currently costs HRM more than \$7 million a year in lost time and excess gas and related greenhouse gas emissions. Without a completed Transportation Master Plan already in place that addresses ways to reduce congestion and achieve a more sustainable transportation system in HRM, there is no certainty that the influx of new residents and workers into the downtown core envisioned in the HRM by Design Plan can be accommodated in a sustainable manner.

Similar analyses could be undertaken for many other sustainability objectives. For example, has HRM evaluated what the impact of the proposed downtown growth will be on the municipality’s greenhouse gas emission targets? Has HRM undertaken a carbon impact study? Have gains in energy conservation projected to be achieved by HRM by Design been fully quantified, and how will different development scenarios affect energy use and conservation outcomes? What are the implications of this plan for energy supply and demand management? For these and many other dimensions of sustainability, please see the 2008 Nova Scotia Genuine Progress Index available at www.gpiatlantic.org.

Please understand that these comments and this analysis are by no means intended to negate the laudable intentions of HRM Council and HRM by Design. In fact, GPI Atlantic is delighted that HRM intends to develop a full-fledged sustainability functional plan for the municipality, which clearly indicates that HRM Council and Staff share GPI Atlantic’s concern for integrated development that effectively achieves economic, social, and environmental objectives simultaneously. Our concern is simply that HRM’s Sustainability Functional Plan (like its Transportation Master Plan) has not yet been completed, and that the impacts of the overall HRM by Design plan cannot therefore be properly assessed and evaluated. Without such evaluation, implementation may well undercut intention, and we therefore consider adoption of the overall HRM by Design plan to be premature. From a GPI perspective, the full functional plan development

should precede the adoption of HRM by Design, since the viability of HRM by Design is dependent on the implementation plans in the transport, energy, and sustainability functional plans to which Council is already committed.

Aside from environmental sustainability concerns, we have not seen evidence of a proper analysis of the potential impacts of the influx of “a critical mass of population and employment” and of the structural development that will accompany such influx on the city’s cultural and aesthetic assets, such as its remaining built heritage and the viewsapes of Halifax harbour. As the Genuine Progress Index also assesses the social and community aspects of development, such social, cultural, and aesthetic impacts should form as important a part of a full impact statement as environmental effects.

Again, GPI Atlantic wishes to emphasize that none of this constitutes a negative appraisal of HRM by Design. But our considered preliminary assessment is that it is too early to tell whether HRM by Design will end up yielding net benefits or net costs and that approval of the Plan is therefore premature.

For these reasons, GPI Atlantic recommends a full impact assessment prior to approval of the Plan—including completion and approval of the Sustainability Functional Plan, the Community Energy Plan, and all five components of the Transportation Master Plan—in order to assess the degree to which benefits might exceed costs, and to ensure that the Plan’s praiseworthy intentions are not undermined by implementation that creates contrary results.

Following is some background information that GPI Atlantic hopes HRM Council and Staff will find useful in helping set a few (but by no means all) key directions for the impact assessment that is required for HRM by Design prior to its approval.

Sustainable transportation

About one year ago—in March, 2008—GPI Atlantic released the *The GPI Transportation Accounts: Sustainable Transportation in Halifax Regional Municipality*, which was intended at the time to aid HRM’s transportation planning process by providing a strong evidence base for decisions and a comprehensive method of assessing the extent to which the Municipal Planning Strategy as a whole and particular policy actions and programs were achieving

their intended objectives.¹ In particular, the transportation indicators and full cost accounting of passenger transportation in HRM outlined in the report were intended to provide HRM planners with models both for assessing the current transportation system and for monitoring its progress towards sustainability, as the Municipal Planning Strategy (MPS) was implemented.

The 2008 GPI analysis took into account as many key economic, social, and environmental impacts of transportation as possible, including some that tend to be overlooked because they are indirect transport-induced effects or because they are not measured in the market economy. In doing so, the analysis provided a more comprehensive guide for transportation planners than traditional methods of evaluating transportation options, and helped identify policies and programs that better meet the needs of users and contribute to genuinely sustainable development. Most importantly, the GPI analysis can be used to help identify the most sustainable solutions to common transportation problems, and thus to contribute to long-term prosperity in the region.

For example, and as noted above, the GPI analysis found that rush-hour congestion on main arteries alone costs Halifax residents and businesses at least \$7 million a year:—More than 90% of this cost is time delays to motorists, 7% represents fuel wasted while idling and crawling, and 3% is the cost of the extra greenhouse gases emitted as a result of this additional fuel use. But even those costs are just a small fraction of the full \$2.7 billion (\$2005) annual cost of driving in HRM. Included in the total cost is the direct expenditure by Haligonians on owning and operating their vehicles, parking, paying for fuel, registration, repairs and car payments. In addition to these direct costs are the hidden transport-related costs—which account for more than half of the total—such as that portion of property and income taxes that pays for roads, traffic patrols, and accidents, and the societal costs that result from greenhouse gas emissions, air pollution, resource depletion, and other environmental impacts of driving.²

The study also found that private vehicles travel more than three billion kilometres a year in HRM, or more than 8,000 km for every HRM resident—consuming 923 litres of fuel and emitting 2.2 tonnes of greenhouse gas emissions per person. In sharp contrast, public

¹ Savelson, Aviva, Ronald Colman and William Martin. 2008. *The GPI Transportation Accounts: Sustainable Transportation in Halifax Regional Municipality*. GPI Atlantic. Halifax. Available from <http://www.gpiatlantic.org/pdf/transportation/hrmtransportation.pdf>. Accessed April 29, 2009. This analysis was based on the work completed in *The GPI Transportation Accounts: Sustainable Transportation in Nova Scotia*, which applied to Nova Scotia extensive research that quantifies and monetizes transportation costs.

² “Hidden” costs are not reflected in a driver’s direct costs—they are paid for (i.e. subsidised) by society. Higher-end cost estimates (based, for example, on less conservative estimates of potential climate change impacts) add up to more than 1.3 times the total conservative HRM transport cost estimate—about \$3.6 billion (higher end) instead of \$2.7 billion (conservative).

transit in HRM accounts for only 26 kilometres a year per resident. Even though 71% of HRM residents live in Metro Transit’s service area, and 90% of those in urban and suburban areas live within 500 metres of a transit stop, the vast majority don’t use public transit and still drive to work.

While the GPI study concluded—from the wide range of evidence examined—that HRM’s present transportation system is unsustainable, the report explicitly acknowledged and commended the approach to planning in HRM’s new Municipal Planning Strategy (MPS) as having the potential to reverse the unsustainable trends of the past and to guide the Municipality in a more sustainable direction. Since the adoption of the MPS in June 2006, HRM has promised a comprehensive Transportation Master Plan along with functional plans with specific action items including the *Road and Road Network Functional Plan*, *Public Transit Functional Plan*, *Active Transportation Functional Plan*, *Transportation Demand Management Functional Plan*, and *Regional Parking Strategy Functional Plan*.³ To date, two of the functional plans—Active Transportation and Parking—have been completed and approved by Council. The Public Transit Functional Plan is completed but has not yet been tabled with Council. The remaining two functional plans—Road and Road Network and Transportation Demand Management—have yet to be completed.⁴

Together, the transportation functional plans are intended to achieve significant reductions in motorized transportation needs that in turn will help achieve HRM’s sustainability goals. This is a laudable objective. However, HRM is poised to adopt HRM by Design—which it calls the “primary policy document” to “guide decision-making for development and investment within downtown Halifax”⁵—without the benefit of a completed Transportation Master Plan. This is most certainly putting the cart before the horse, as it must be demonstrated rather than assumed that the downtown plan will accord with the Transportation Master Plan and its component functional plans and with the Sustainability Functional Plan.

According to the *Downtown Halifax Secondary Municipal Planning Strategy* (DHSMPS) document, downtown Halifax is targeted for “significant residential growth” to the tune of 25,000 new residents over the next 25 years, along with an expansion of commercial space—3 million more square feet of office space in the next 15 years, and a total of 15 million square feet of development in the 25 year planning period.

³ For details on the Transportation Master Plan and five Functional Plans please refer to HRM.2006. Regional Municipal Planning Strategy. Halifax. pp. 69-78.

⁴ David McCusker, Manager, Regional Transportation Planning for Halifax Regional Municipality. Personal Communication, April 30, 2009.

⁵ Downtown Halifax Secondary Municipal Planning Strategy, p. 60.

In principle, densification of the downtown area may well accord with overall sustainability objectives and with sustainable transportation objectives in particular. But much depends on the nature and kind of densification undertaken and its relation to sprawl reduction targets in suburban and ex-urban areas, and on which particular development scenarios come closest to achieving the sustainability and transportation objectives.

It is therefore most surprising to read that—without having conducted any proper impact analysis—HRM by Design nevertheless contends that “there is capacity for [this growth] without negative impact on the open space, heritage protection and urban vibrancy goals of the project.”⁶ GPI Atlantic has not seen the evidence base for that contention, and would argue that approval of HRM by Design should be contingent on convincing evidence to support such contentions.

In sum, GPI Atlantic recommends that Council consider carefully the reality that, without a completed Transportation Master Plan, there is no assurance that the impact of HRM by Design on the future transportation system will be sustainable. At a minimum, a well designed traffic impact study must be conducted to assess the effect of the additional traffic that will be generated by the proposed development, and different development scenarios should be assessed in terms of their differential impacts on transportation outcomes. Based on the findings of the 2008 GPI transportation report for HRM, it is clear that effective community design requires and depends on having in place a sustainable transportation plan that ensures greater access (via public transit, light rail, cycling, walking, etc) with less driving.

These recommendations to complete HRM’s Transportation Master Plan and Sustainability Functional Plan prior to approval of HRM by Design need not result in undue delay in the implementation of HRM by Design, since these particular documents are already under development and reflect firm prior commitments by Council. On the contrary, completion and approval of these key plans will likely speed implementation of HRM by Design and prevent costly mistakes that may undermine Council’s own laudable sustainability objectives.

As well, it must be remembered that built infrastructure, once in place, will affect the appearance, viability, prosperity, aesthetics, and quality of life of downtown Halifax and HRM as a whole for generations to come, and will certainly produce some irreversible impacts. In such a momentous decision that will impact future generations, strong evidence and a clear analysis and understanding of impacts and implementation effects is the only prudent, conservative, and wise path for Council to take.

⁶ Ibid. p. 43.

Impacts on carbon/GHG emissions

Arguably, the most critical area in which action is urgently required by all levels of government is in the reduction of greenhouse gas (GHG) emissions—a challenge the UK Ambassador to the United Nations has declared to be the greatest threat to global security since the Second World War.⁷ Thus, the GPI Greenhouse Gas Accounts constitute one of the 20 core components of the Nova Scotia Genuine Progress Index.

Here we recall just a few key elements of the seriousness of the challenge that have prompted HRM to commit to major GHG reductions. We outline the dimensions and magnitude of the challenge in some detail here in order to highlight the critical importance of assessing the degree to which HRM by Design will or will not reduce the Municipality's GHG emissions, and the importance of costing out different downtown development scenarios to assess which will have the smallest carbon footprint. We begin with the big picture:

The Intergovernmental Panel on Climate Change (IPCC) notes that eleven of the last twelve years rank among the warmest since 1850, and the warming trend in the last half century (between 1956 and 2005) has been nearly twice that of the century-long trend between 1906 and 2005. Global average sea level has risen at a rate of 1.8 mm per year since 1961, and 3.1 mm per year since 1993. Annual average Arctic sea ice has shrunk by 2.7% per decade since 1978 and mountain glaciers and snow cover have declined in both hemispheres.⁸

According to the IPCC, global atmospheric concentrations of greenhouse gases have increased markedly as a result of human activities since 1750. Global greenhouse gas (GHG) emissions due to human activities grew by 70% between 1970 and 2004 alone, and the IPCC has determined that it is very likely that most of the observed increase in globally averaged temperatures since the mid-20th century is due to the observed increase in anthropogenic (human-induced) GHG concentrations.

Not only are humans contributing to climate change that is already occurring, but the IPCC projects that global GHG emissions will continue to grow over the next few decades as a result of current policies and management practices, and that continued

⁷ Ambassador Sir Emyr Jones Parry. Permanent Representative of the United Kingdom to the United Nations. 2007. *The Greatest Threat to Global Security: Climate Change is not merely an environmental problem.* In *UN Chronicle Online Edition*. Available from <http://www0.un.org/Pubs/chronicle/2007/issue2/0207p20.htm>. Accessed May 1, 2009.

⁸ IPCC (Intergovernmental Panel on Climate Change) 2007. *Climate Change 2007: Synthesis Report*. p. 30. Available from <http://www.ipcc.ch/ipccreports/ar4-syr.htm>. Accessed April 28, 2009.

GHG emissions at or above the current rate will cause further warming and induce many changes in the global climate system. In short, climate change is now widely acknowledged as the most serious environmental challenge of the coming century and likely the most serious economic and social challenge, as well.

Predicted impacts of climate change in Nova Scotia include an increase in extreme weather events, particularly hurricanes, floods, and droughts, as well as adverse impacts on the province's fisheries, forests, and agricultural industries. Other serious impacts predicted for Nova Scotia include flooding in low-lying areas, coastal erosion, saltwater infiltration of groundwater, and falling lake and groundwater levels.⁹ Very recently, several studies have found that climate change models are warning of potentially devastating impacts of sea level rise on low-lying areas of the Province such as Truro. Other lowland areas at the head of the Bay of Fundy are also at risk from storm surges.^{10, 11}

It is yet not certain what the impacts of climate change and sea-level rise will be on Halifax, but it is noteworthy that meteorologists concluded that Hurricane Juan hit Halifax with such unexpected, devastating, destructive, and costly force largely because the waters of the Atlantic were several degrees warmer than normal at that time. In addition to environmental impacts, climate change also poses serious health concerns for Canadians, including the strong likelihood of increases in temperature-related illnesses, vector-borne diseases, and air-pollution health effects.¹²

Radical changes are still required in Nova Scotia in order to meet GHG reduction targets. Policy makers often argue that addressing climate change through large cuts in GHG emissions will be too costly and will weaken the economy. However, these arguments rarely weigh the short-term costs of action (generally the sole policy consideration) against the long-term costs of predicted environmental and economic damages resulting from climate change. Both sides of the equation must be considered in any assessment of the true costs of climate change and in order to assess whether damage avoidance may provide substantial long-term economic benefits when all costs are considered.

⁹ Walker, Sally et al. GPI Atlantic 2001. The Nova Scotia Greenhouse Gas Accounts for the Genuine Progress Index. Available from <http://www.gpiatlantic.org/pdf/greenhouse/ghg.pdf>. Accessed April 28, 2009.

¹⁰ Natural Resources Canada. From Impacts to Adaptation: Canada in a Changing Climate 2007. Atlantic Canada. Available from http://adaptation.nrcan.gc.ca/assess/2007/at/index_e.php. Accessed April 28, 2009. p. 140.

¹¹ Natural Resources Canada. Climate Change Impacts and Adaptation: A Canadian Perspective, Impacts. Available from http://www.adaptation.nrcan.gc.ca/perspective/coastal_3_e.php. Accessed April 28, 2009.

¹² Peter Berry and Dawn Paszkowski. Climate Change and Health Office, Health Canada. "Assessing the Capacity of Individual Canadians to Adapt to the Health Impacts of Climate Change." Natural Resources Canada, Speakers Series. Available from: http://adaptation.nrcan.gc.ca/speakerseries/pdf/presentation_berry_for_web_e.pdf. Accessed April 28, 2009.

In the most detailed, extensive, and carefully researched such cost-benefit study to date, Lord Nicholas Stern, former Chief Economist of the World Bank, concluded that reducing global GHG emissions to the point where atmospheric GHG concentrations would be stabilized would likely cost 1% of global GDP. However, a ‘business as usual’ scenario of continuing GHG emissions would likely cost between 5% and 20% of global GDP, depending on which climate change models and emission scenarios were used. Stern concluded unequivocally: “The benefits of strong, early action on climate change outweigh the costs.”

A far more modest GPI cost-benefit analysis for Nova Scotia found that when the costs of reducing Nova Scotia’s GHG emissions to reach the Province’s Environmental Goals and Sustainable Prosperity Act target of a 10% reduction in GHG emissions below 1990 levels by 2020 are subtracted from the benefits attained from that reduction in avoided climate change damages and cleaner air, the net cumulative benefit to society is likely to exceed \$846 million. Achieving the more ambitious David Suzuki Foundation and Pembina Institute target of a 25% reduction of GHG emissions below 1990 levels by 2020 would produce a net cumulative benefit of more than \$1.8 billion. The analysis found that every \$1 invested in reducing GHG emissions between 2008 and 2020 will save at least \$29 in avoided climate change damages.

Even using the most conservative possible cost assumptions—comparing the most minimal (optimistic) predicted climate change damage costs as projected by climate change models with the most pessimistic (high-end) costs of reducing emissions—the economic benefits of reducing emissions were still found to exceed substantially the actual costs of reducing emissions. What this means, in essence, is that greenhouse gas emission reductions are cost effective at any price when compared to potential climate change damage costs—using any range of estimates in the accepted literature.¹³

However, despite the challenge of meeting the 10% reduction target outlined in the Province’s Environmental Goals and Sustainable Prosperity Act, it is now widely accepted in the scientific community that considerably more drastic cuts in GHG emissions than previously envisioned will be required to stabilize the world’s climate and to prevent potentially catastrophic damage. In light of this evidence and these recent developments, the higher Suzuki-Pembina target (25% reduction from 1990 levels by 2020) may well reflect a far more realistic set of targets that the province will need to

¹³ This GPI conclusion is strongly supported by the most thorough and comprehensive analysis of the economics of climate change ever undertaken. Lord Nicholas Stern, former Chief Economist and Senior Vice-President of the World Bank, concluded “The benefits of strong early action on climate change outweigh the costs...The costs of stabilizing the climate are significant but manageable; delay would be dangerous and much more costly.” Sir Nicholas Stern. *The Stern Review: The Economics of Climate Change. Executive Summary*. Available from http://news.bbc.co.uk/2/shared/bsp/hi/pdfs/30_10_06_exec_sum.pdf. Accessed April 28, 2009.

consider on the basis of the actual scientific evidence rather than from the perspective of political feasibility or expediency.

In light of these serious concerns about climate change and the contribution of anthropogenic GHG emissions to global warming, reducing and monitoring GHG emissions in Nova Scotia and HRM must be a top priority, with measures immediately put in place to improve energy efficiency, conservation, and shifts to renewable energy. HRM by Design must also be evaluated within this context, with a clear understanding, prior to approval, of the Plan's carbon impacts and on which development scenario will have the smallest carbon footprint.

The *Downtown Halifax Secondary Municipal Planning Strategy* (DHSMPS) states:

At the building scale, a sustainable city is one that promotes sustainable building design to reduce resource and energy consumption. And finally, a sustainable city is one that recognizes that to be truly sustainable at any scale, development must meet the test and principles of the triple bottom line: socially and culturally sustainable, economically sustainable and environmentally sustainable.¹⁴

While there is a chapter in the Downtown Halifax Land Use By-law and Design Manual relating to sustainable design, it notes: “Until HRM acquires the provincial authority to require that the guidelines in this chapter be met for all developments, the bonus zoning program will be used to encourage them in downtown Halifax. This chapter will also provide guidance for applicants who wish to voluntarily incorporate sustainable design in their projects.”¹⁵

Thus, developers are presently given the option of being sustainable or not in their design and building plans. There is no current requirement to reduce or even monitor GHG emissions, to employ alternative energy systems, or to use sustainable building practices, despite the urgency of the current situation. The Municipality's Sustainability Functional Plan, which will presumably include recommendations on these and related issues, has not yet been completed and approved. Since HRM has not yet examined whether the proposed “growth” in both people, traffic, and built structures in the downtown core will bring us any closer to the target of a 10% (or 25%) reduction in GHG emissions below 1990 levels by 2020, it is premature to approve a Plan that does not contain such requirements.

Further, and perhaps most troubling, is that while developers are not required to incorporate any measures or practices that reduce GHG emissions, they *are* required to

¹⁴ DHSMPS, p. 5.

¹⁵ Downtown Halifax Land Use By-law and Design Manual, p. 59.

“ensure development mitigates the impacts of climate change.” In other words, developers have to put in place measures that will mitigate against the effects of sea level rise and storm surge events in the vicinity of Halifax Harbour rather than to contribute to the prevention of such potentially disastrous scenarios through sustainable design, building, and energy use practices. Thus, there is no doubt that those involved in the creation of the Design Manual were well aware of the urgency and potentially dire consequences of climate change on the city of Halifax. It is therefore inexplicable to GPI Atlantic researchers and analysts why HRM by Design contains no explicit GHG emission reduction targets, no requirements for sustainable design, building, and energy use that will reduce GHG emissions, and not even a requirement to monitor such emissions in major development projects.

GPI Atlantic recognizes that predicted long-term changes caused by current practices are uncertain. However, when future impacts are uncertain but potentially damaging and even irreversible, it is necessary to follow the “precautionary principle”—a widely accepted dictum, enshrined in the Nova Scotia Environment Act, which holds that scientific uncertainty must not be a cause for inaction when there is the potential for serious environmental damage. In other words, following the precautionary principle, as required by law, necessitates first a full assessment by HRM Staff and Council of the impact of HRM by Design and of its projected residential and commercial growth on the Municipality’s GHG emissions, and second, the incorporation of clear and strict GHG emission reduction targets, guidelines, and requirements into the Plan. Until this is done, it is GPI Atlantic’s assessment that premature adoption of HRM by Design would violate the precautionary principle clause of the Province’s Environment Act.

In sum, Council’s approval of this Plan should at least await a) HRM’s analysis of the Plan’s effect on GHG emissions and b) acquisition of the authority to require that the minimum sustainability guidelines presented in the Design Manual be met for all developments envisioned in the Plan. Again, as noted earlier, it must be recalled that built infrastructure, once in place, will have major and often irreversible impacts for generations to come. Respect for the wellbeing of future generations of HRM residents requires these cautionary and prudent steps prior to approval of HRM by Design.

Social and cultural assets

The Genuine Progress Index (GPI) assigns explicit value to human, social, natural and cultural assets. While the previous two sections have focussed largely on the importance of valuing natural assets and preventing the depreciation of natural capital, Halifax is also famous for both the beauty of its harbour and ocean vistas, and for the historical, cultural and aesthetic value of its built heritage. These must also be properly valued and

accounted for in any impact assessment of Halifax by Design.

For close to three decades, Halifax has had regulations in place governing maximum height levels and protecting heritage buildings.¹⁶ According to the Heritage Trust of Nova Scotia, these existing height limits have worked well in protecting the character, quality, and cultural heritage of the city. However, the Trust notes: “HRM by Design would greatly increase as-of-right height limits to between 72 and 160 feet in most cases, which would create a financial incentive for speculators to buy buildings...demolish and then build larger buildings.” According to the Trust, “if HRM by Design were adopted, about 100 historic buildings would be at greater risk of demolition.”¹⁷

While GPI Atlantic is not in a position to assess the impact of HRM by Design on the City’s character and cultural heritage, it strongly recommends a full assessment of the impact of significant increases in height limits on Halifax’s built heritage, viewsapes, and character. Such an evaluation should include projections of possible tourism effects, and might begin with a tourist survey designed to assess how important existing viewsapes and heritage buildings are to their experience in Halifax. Preliminary indications are that proposed high-rise developments in the city core envisioned in Halifax by Design will likely threaten the viewscape of Halifax Harbour from Citadel Hill.^{18, 19} Again, it is not reasonable, prudent, or evidence-based to approve HRM by Design prior to a full assessment of the potential impacts of impeded or reduced harbour viewsapes on culture, aesthetics, tourism, and quality of life in HRM.

¹⁶ Prior to amalgamation, an as-of-right height limit of 25 feet was established east of Hollis Street. In the Central Business District west of Hollis Street, the height limits were set at 40 feet. In 1981 a height limit of 45 feet was placed on some properties in the south end of the city. Heritage Trust of Nova Scotia. Press Release. “Downtown Safeguards at Risk.” April, 2009. Available from http://3.ns.sympatico.ca/heritage.trust/htns_press.html#1. Accessed April 29, 2009.

¹⁷ Ibid.

¹⁸ The recent decision by Council to grandfather four Development Agreement Applications, all within the downtown core, that do not conform to the height requirements of HRM by Design could not only result in the construction of new buildings in the downtown area that are contrary to vision and intention of HRM by Design, but may result in structures that once built, will impede the view of Halifax Harbour from Citadel Hill. For instance, the proposed 16-storey redevelopment of the Roy Building—partially located in the proposed Barrington Heritage Conservation District where the maximum height is proposed to be 72 feet—will be 225 feet high. Similarly, an application for a 20 storey building that will be 220 feet high has also been grandfathered by Council—again in the proposed Barrington Heritage Conservation District where the maximum height is proposed to be 72 feet. Halifax Regional Municipality. Item no. 3. March 24, 2009.

<http://www.halifax.ca/council/agendasc/documents/090324cow3i.pdf>. Accessed April 28, 2009; Halifax Regional Municipality. Council Minutes. March 31, 2009. Available from <http://www.halifax.ca/council/documents/cw090331.pdf>. Accessed April 28, 2009.

¹⁹ In addition, the two towers of the proposed World Trade and Convention Centre—on the former Halifax Herald and Midtown Tavern lands—are estimated to be 14 and 18 storeys high, respectively, based on the footprints of the two buildings that are available on the HRM by Design Web site. Phil Pacey. President, Heritage Trust of Nova Scotia. Personal communication. April 30, 2009.

BACKGROUND ON GPI ATLANTIC

Genuine Progress Index Atlantic is a non-profit research group founded in April, 1997. For more than a decade, GPI Atlantic's focus and mandate have been to ask what *genuine progress* in Nova Scotia looks like, and to attempt to assess whether we are achieving such progress. In order to do this, GPI Atlantic has developed a set of genuine progress indicators for 20 components comprising a wide range of social, economic, and environmental dimensions.

From the GPI perspective, value should be explicitly placed on the human, social, cultural, and natural capital that are integral components of our national and provincial wealth. These assets are subject to depreciation and require re-investment to restore and enhance their value. At the same time, activities like crime, unemployment, and car crashes that cause harm to society, and activities like GHG emissions, pollution, and resource depletion and degradation that cause harm to the natural world and to its essential life support systems, are also recognized in the GPI as having adverse economic impacts, and therefore register as costs. Essentially—from a GPI perspective—the economy should be designed to serve the interests of people and the planet, which are of course inextricably linked.

This past fall, GPI Atlantic released its *2008 Nova Scotia GPI Accounts*, the culmination of nearly 12 years of developmental work to create a Genuine Progress Index for the Province. This completed set of indicators and accounts is intended to provide government – including municipal government -- with a practical tool to measure progress towards genuinely sustainable prosperity.

In the last 12 years, GPI Atlantic has monitored trends in more than 100 indicators of social, environmental, and economic wellbeing and has demonstrated definitively that omission of these key measures of environmental sustainability, quality of life, health, equity, and financial security in the Gross Domestic Product make the GDP a misleading and delusional statistic when it is mistakenly used by policy makers as a measure of societal progress and wellbeing.

The purpose of the new GPI measurement system is precisely to identify the Province's strengths so that we can build on them and protect them rather than take them for

granted, and to identify weaknesses so that we can work to overcome them as soon as we detect early warning signals.

Since the Second World War, economic growth statistics based on the Gross Domestic Product (GDP) have been widely and mistakenly used as a proxy for societal wellbeing and prosperity. This was not the intention of those who created the GDP. Thus, Simon Kuznets, Nobel Prize winner and principal architect of national income and GDP accounting, warned 40 years ago:

“The welfare of a nation can scarcely be inferred from a measurement of national income... Goals for “more” growth should specify of what and for what.”

Unfortunately, we currently continue to measure our progress and gauge our wellbeing according to this narrow set of materialist indicators—our economic growth rates. Even small changes in the Gross Domestic Product (GDP) and related market statistics are closely monitored by policy makers, while vital social and environmental factors remain invisible in our national accounts and core progress measures. The GDP is not designed to distinguish between what benefits and harms society, but is a narrow market measure that accounts for only a fraction of true societal wealth. Because it is not an indicator of prosperity or wellbeing, it cannot and should not be used to inform the making of policy that has those goals.

Because what we count and measure reflects our values as a society and determines what makes it onto the policy agendas of governments, we urgently need better measures of wellbeing and progress that account for a more complete range of social, economic, and environmental factors. Carefully chosen indicators like those in the Genuine Progress Index can therefore tell us far more accurately whether we are better off than we used to be, whether we are leaving the world a better place for our children, and what we need to change in order to move towards genuinely sustainable prosperity.