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**Law Amendments Committee**  
**Nova Scotia Legislature**  
**October 31, 2022**  
**Bill 225 – Halifax Regional Municipality Charter**

As I noted in another submission to Law Amendments Committee, I am a Nova Scotia resident, taxpayer, builder and provider of quality, reasonably priced rental housing.

I applaud the Minister of Municipal Affairs and Housing for Bill 225.

Why?

Because we are in a housing crisis and a climate crisis...

And it is my experience that the Halifax Regional Municipality has proven wholly unable to act like we are in a housing crisis and a climate crisis.

Words are not enough.

It's time for action.

Our company - Polycorp - has been one of the more active developers of housing units in the province over the past 20 years.

We do not produce a large volume every year, but we are at it, steady, year-after-year.

We have been involved in approximately 1000 units in the last 15 to 20 years, which would probably put us in the top 20 builders of new housing in Nova Scotia.

We have land inventory for another 2000-plus units, so we are very concerned about the current situation.

Mind you, we were also very concerned about the situation 10 years ago. And when we voiced our concerns 10 years ago, nobody listened.

We can no longer afford to wait for HRM to get their act together.

Waiting in a crisis is not an option.

Here are some examples of how broken HRM's approach to housing is.

In one case, our company was refused a development permit because someone – an HRM staff person - actually fabricated an incredibly detailed story about how the land we owned was supposed to be a playground.

There was no documentation to support this wild idea. It was just made up.

In that same case, the then Director of Planning for HRM said – under oath in court, quote: “a zoning confirmation letter can be indicative, and may not be definitive”.

Imagine using a government document like that to rely on when making multi-million dollar business decisions.

It took two and a half years and a Supreme Court hearing to get a court order to HRM to issue the permit.

HRM Legal Services deliberately tried to warp, twist and distort the facts as much as they could. They made what should have been a simple hearing into a circus to try to prevent the matter from being heard, and to force a full trial to delay things further.

Court day saw 15 lawyers in the court room. I counted them. 15.

And then, when we did get the court order, HRM started the permit review from scratch instead of re-starting the previous processing. It took months more before HRM finally issued the permit.

That took about 100 units out of the inventory of housing stock in this Province that have never been replaced to date.

It cost HRM probably half a million dollars in legal fees. They had to reimburse us over \$100,000 in legal fees, plus all of the other six other parties involved. HRM lost, by my estimate, over three million dollars in property taxes in the last ten years for that project never having been built, and it cost the Province \$3M in sales tax revenue that they did not get because the project was never built.

The full details of that case never really came out, but they would be very interesting reading for anybody that was interested. It's all available online, or ask me for a copy of the court decision.

I can tell you about applying for what should have been a simple amendment to a development agreement that should have taken, in normal circumstances, and reasonable processing times, three months.

It took almost three years.

I can tell you about applying for a building permit and after 16 weeks, the permit not having been looked at by some departments. This was BEFORE they could blame it on the new online computer system.

I can tell you about questioning the value that HRM came up with for a building permit and my being told "if you don't like it, you can sue us."

I can tell you about wanting to make an application to change the zoning on a piece of property and a more senior HRM staff person saying, "we just changed that zone 20 years ago -what has changed since then?".

My response – "Are you for real – have you heard about the little thing called global warming and the fact that population and real estate values are off the charts?"

I could tell you about a current project that we own and want to develop – very similar to the previous example.

One of the largest parcels of land inside the entire HRM serviceable boundary – in other words, it is already inside the sewer and water boundary and has plentiful sewer and water available.

This property had its zoning "modernized" in 2000. That was 22 years ago now.

Modernization in the year 2000 envisioned nice, large 10,000 sq ft lots with single family homes with lots of street frontage.

The sort of houses that would sell today for \$800,000+. Not exactly affordable.

Just to give you an idea of what is actually causing the housing crisis...

Over the past 18 months, we have had several meetings with HRM staff on that project.

We want to build a large scale, medium density Net Zero community with housing at an affordable or attainable price point. The sort of a community that people write about. Walkable, lots of green space, respect for the natural environment...planning utopia.

Now back to the real world.

Typically, it takes 2 months to get a meeting, after sending 10 to 20 emails and/or phone calls. At times in the process, one may become concerned that the other party has died, retired or changed jobs due to the lack of response.

After a typical meeting, it typically takes several more requests for an update, which comes out in another month or so. Typically, the response is unfavourable.

So, the process starts again to organize another meeting, most likely with another group of equally indifferent staff.

Nobody has ever said "Wow, this is great. Let's work together to make this happen".

Instead, HRM staff effectively try to pound the lifeblood and enthusiasm out of me and make so many vague references to future dates, obstacles and hurdles that it is actually amazing that as much gets done as we see happening.

It is clear that there is a housing shortage. Yet some organizations involved in the situation do not seem to realize it.

Or if they do, they simply don't act like they know, and most definitely do not act like there is any urgency to get more housing stock built ASAP.

Our project is "only" 1000 to 1500 units. This decade, next decade, the decade after – What's the hurry???

I'm left feeling like I'm the only one in these meetings that cares about building more housing that people can afford.

That's why Bill 225 is so important.

Anything that the Province can do to cut through the red tape and delays from HRM Planning or the entirety of HRM's operation is desperately needed.

This was probably needed 10 years ago.

If anything, Bill 225 doesn't go far enough.

Bill 225 should apply to existing Bylaws that affect the current housing stock as well. It should be expanded to target Bylaws that arbitrarily and artificially increase the operating costs for our rental housing operation that TRY to provide affordable housing to residents.

These HRM Bylaws have been on the books for years and need to be struck down. An alarm bylaw that gives the same one free ticket per year for a false alarm to a single family home as for a 200 unit building.

Obviously if one free false alarm is reasonable for a house, some latitude should be given for a 200 unit building with 400 people living in it. But there isn't. Even when one takes the time to point out the flaw when the Bylaw is created, it is summarily dismissed by HRM staff.

A Bylaw that openly discriminates against the rental housing industry by denying solid waste services to apartment buildings of over six units, forcing rental housing providers to subsidize single family homes regarding solid waste management.

A Construction & Demolition Debris Bylaw that forces us to take construction debris and materials to the one approved site in the entire city, instead of letting the material get hauled to Nova Scotia Department of Environment approved facilities outside of HRM.

HRM has created and is supporting an unregulated monopoly on this one regarding C&D materials.

I can find lots of other highly problematic HRM Bylaws that are part of the death-by-1000-cuts that has created the current housing crisis.

So, please keep the pressure on HRM to try to make a difference to make things just a little bit better in this housing crisis.

Pass Bill 225. Our housing crisis needs fast action. HRM can't deliver. It's long since time for the Province to help.