



Date: February 28, 2020

Ms. Doreen Friis  
Regulatory Affairs Officer/Clerk  
Nova Scotia Utility and Review Board  
1601 Lower Water Street, 3rd Floor  
Halifax, NS B3J 3S3

Dear Ms. Friis:

*Re: M09494 – Halifax Water - Regional Development Charge Application and Approval of Amendments to the Schedule of Rates, Rules and Regulations*

Affirmative Ventures is a non-profit organization working to build independent living options for mental health consumers in our community. Since 1991, we have been actively involved in providing training and employment supports for young adults who face mental health challenges but who demonstrate capabilities for living independently.

Our training and employment programs are coordinated with NSHA Mental Health and many other stakeholders. We use a social enterprise model for service delivery and currently operate 5 social enterprises from our offices on Main Street in Dartmouth.

In the late 1990s it became evident that the advances we were making in employment for our clients were being compromised by the lack of stable, affordable housing. We were able to open our 10-unit "Affirmative House" in Dartmouth in 2007 and many of our tenants were able to advance their independent living goals during the 5 years they lived in this supportive housing project.

Since 2007, the housing situation and mental health conditions in our community have changed significantly. Now, those who 'graduate' from Affirmative House face a severe shortage of affordable housing. Also, our client base is now older. In the provincial riding of Dartmouth East where our housing and offices are located, there is a 0.6% vacancy rate. Our staff regularly receives housing inquiries from those who have, and from those who do not have, mental health conditions.

Our housing model needs to expand to help meet the challenges facing our clients. We have been able to secure an as-of-right development opportunity for property we own on Main Street and are working closely with CMHC and Halifax Regional Municipality on the development of 45 units of affordable housing. These housing units will be located on top of a ground floor 'social enterprise hub'.

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Concerning Halifax Water's application to increase its fees, we note that:

- 1) Halifax Regional Municipality already allows its building permits to be waived for non-profit housing providers, and this constitutes 'equity' for the purpose of securing low cost federal financing, and
- 2) Last year Regional Council voted unanimously to waive all other permit fees under its authority to further help non-profit housing providers.

Now that we are advancing the plans for our new building, we are shocked with the significant cost increases for Halifax Water wastewater and connection fees since 2007. In 2007, our total budget for Affirmative House permits was \$8,454, including Halifax Water fees, or, \$845 per unit. We were successful in obtaining a \$5,000 rebate from HRM at that time, yielding a net cost of \$345 per unit for Affirmative House.

Our budget for Halifax Water wastewater and connection fees today is \$223,782 (including the proposed fee increases) or \$4,973 per unit. This represents a 1,441% increase over the permit costs for Affirmative House in 2007.

We have asked that Halifax Water waive or reduce their fees but have been advised they are unable to do so under the Public Utilities Act. Halifax Water fees will therefore form part of our project costs. Their fees will be capitalized and will be paid by our clients in the form of rent.

We are writing in opposition to Halifax Water's application to increase its fees for wastewater and water connections and respectfully ask that the Utility and Review Board set aside these proposed fee increases.

Thank you.



Ken Greer Q.C., Chair  
Affirmative Ventures Association

- cc. Premier Stephen McNeil  
Honourable Derek Mombourquette, Minister of Energy and Mines  
Honourable Chuck Porter, Minister of Municipal Affairs and Housing  
Mayor Mike Savage, Halifax Regional Municipality



[www.housingtrust.ca](http://www.housingtrust.ca)

PO Box 8474  
Halifax, NS B3K 5M2

March 15<sup>th</sup>, 2020

Nova Scotia Utility and Review Board  
Summit Place  
1601 Lower Water Street, 3<sup>rd</sup> Floor  
Halifax, NS B3J 3S3

Attention: Clerk of the Board

**Re: Application by Halifax Regional Water Commission for approval of revised  
Regional Development Charges**

Ladies and Gentlemen

#### **REQUEST**

I am writing to the UARB to request that you amend the Schedule of Rates and Regulations for Water, Wastewater and Stormwater Services to include a different rate for nonprofit and affordable housing projects. Ideally, the RDC charges should be reduced to zero.

#### **BACKGROUND**

The Housing Trust of Nova Scotia is a non-profit housing organization that was formed in 2009 to tackle the growing problem of housing affordability in Nova Scotia. The Trust owns two ½ acre parcels of land on Gottingen Street and is close to having funding for the first project - a 115 unit apartment building at 2250 Maitland Street. Financing for these types of projects is extremely hard to put together, and every additional cost adds to the rent that must be charged to tenants. If the costs become too high, the financial viability of the project can become unviable.

A review of best practices in Canada shows that most progressive communities are providing free land, and waiving all building permits to assist in the production of needed affordable housing. Although the Halifax Regional Municipality has been studying the issue of affordable housing since amalgamation in 2006, to date, very little has been done. Surplus land, such as old school sites, are still sold off to the highest bidder, with no requirement for affordable housing. HRM did implement an affordable housing bylaw in 2017, however this bylaw only waives the building permit fee for qualified affordable housing projects, not the regional development charges. These fees are substantial, and are a real barrier to the production of affordable housing. For the Housing Trust's first project at 2250 Maitland Street, our calculated cost for the permits under the current fee structure is as follows:

<b>Estimated Building Permit Fees</b>		
<b>2250 Maitland Street, Halifax, NS</b>		
HRM Building Permit Fees	\$ 123,000	26%
Solid Waste Charges & Plumbing	\$ 33,000	7%
Regional Development Charges	\$ 326,000	68%
<b>Total Building Permit Fee</b>	<b>\$ 482,000</b>	<b>100%</b>

So while progressive municipalities across the country are waiving 100% of all development charges to foster the production of affordable housing, HRM is currently only waiving 26% of all charges, with the solid waste fees and regional development charges accounting for an additional \$350,000 of project cost. The current request by HRWC will add another \$66,000 to these charges.

HRM is in desperate need of more affordable housing. I urge the UARB to provide a mechanism for the HRWC to waive all RDC's associated with affordable housing.

Respectfully submitted



Ross Cantwell, M.Sc.RE., President