



June 18, 2021

Nova Scotia Federation of Municipalities
Suite 1304, 1809 Barrington Street
Halifax, N.S. B3J 3K8

RE: Nova Scotia Affordable Housing Commission Final Report

The final report from the Nova Scotia Housing Commission contains policy suggestions which have significant potential impacts on municipalities, including the Municipality of East Hants.

Council is concerned with the report's general lack of information on potential financial implications, including an absence of estimates for how much these recommendations would cost municipalities or how they would impact municipal budgets. Council is further concerned that some of the recommendations could infringe on the Municipality's planning regulations. Recommendation 12, for example would amend the necessary legislation to require secondary suites and shared housing to be permitted in all residential zones in Nova Scotia. East Hants' current planning regulations do support secondary suites in residential zones, but these regulations were developed through a thorough planning process in the community. Council believes that imposing a mandatory easing of regulations from the province could prove problematic, as it disregards the process, including public consultation, which goes into establishing municipal planning regulations.

Council is also concerned about the proposed amendments to enabling legislation, including recommendations 3, 5, 7, 8 and 9 which would allow municipalities to waive or reduce fees, reduce taxes or provide incentives for the creation of affordable housing. Council is wary that allowing municipalities to spend money in an area of provincial jurisdiction will result in the downloading of provincial responsibility for affordable housing onto municipalities. Council is highly concerned that enabling municipalities to provide incentives or financial benefits to developers in order to obtain affordable housing will reduce the revenue of the municipality, without reducing costs and with no clear directives in the final report for how to ensure municipalities are able to recoup these costs. If

the province moves to enable municipalities to provide financial support for affordable housing, Council believes that they will be expected to do so. Council is concerned that there is no dedicated Provincial funding recommended to allow these actions without municipalities themselves incurring the costs, rather than the Province with whom responsibility for housing rests. Any program that enables municipal spending or subsidization should be funded by the Province through a Grant In Lieu like program.

As the final report summarizes, affordable housing is an undeniable issue in Nova Scotia, and one which is felt keenly by the Council of East Hants and its constituents. While the Council recognizes the need for affordable housing, they reiterate that this topic is not a Municipal responsibility but a provincial one, and are concerned that multiple recommendations in this report would delegate responsibility to Municipalities without any provisions to ensure the Province would cover associated costs.

Sincerely,



Eleanor Roulston
Warden, Municipality of East Hants