



2024-06-17

Norval Mitchell, Chairperson  
Planning Advisory Committee  
Municipality of East Hants  
230-15 Commerce Court  
Elmsdale, NS B2S 3K5

Re: Request for Development Agreement Amendment for PID 45428802, 45428810 and 45416831

---

Dear Mr. Mitchell,

I am writing to advocate for the approval of the Development Agreement (DA) amendment application submitted by Riverstone 214 Ltd for the properties identified by PIDs 45428802, 45428810, and 45416831. Despite the staff's negative recommendation, I urge the Planning Advisory Committee to consider the critical importance of this amendment to address the current housing crisis and the lack of demand for commercial spaces in our area.

**Market Realities and Demand Shifts:** The commercial component of the development, despite extensive marketing efforts over the past year, has not attracted tenants due to the saturated commercial market in Elmsdale. The existing commercial spaces, particularly those anchored by national tenants, are more appealing to potential tenants, leaving new commercial developments struggling to find occupants. This lack of demand for additional commercial space makes the current development plan financially unfeasible, jeopardizing the project's funding. Furthermore, maintaining vacant commercial space generates no revenue, placing a financial strain on the project. Every month that the commercial spaces remain vacant, the project incurs approximately \$10,000 in losses, exacerbating the financial burden. Additionally, moving the commercial component to the six-storey building is not feasible because of the lack of demand and the location of the commercial spaces.

**Addressing Housing Shortages:** Canada, and particularly Nova Scotia and East Hants, is experiencing a significant housing shortage. The population has been growing steadily, with East Hants' population increasing from 23,542 in 2016 to 25,631 in 2021. This growth has created an urgent need for more residential properties. By converting the four-storey building to residential use, we can provide much-needed housing and help mitigate the housing crisis facing our community. Construction for the four-storey building has already begun, further emphasizing the immediate potential to address these housing needs if the amendment is approved.

**Optimizing Land Use:** With an abundance of vacant commercial spaces already available, adding more commercial areas that are likely to remain unoccupied does not make sense. Instead, converting the space to residential use ensures the land is used efficiently and beneficially.



**Flexible Commercial Definitions:** Introducing short-term rental accommodations into the definition of commercial use provides the necessary flexibility to adapt to market demands. This flexibility is crucial for the project's viability, allowing it to move forward and contribute to the local economy and housing market.

While we understand that the proposed amendment does not strictly adhere to the existing policy, it is imperative to consider the broader context of the housing crisis and the evident lack of commercial demand. The rigidity of policy should not hinder the practical and necessary evolution of our community's development plans.

The failure to amend the DA as requested could jeopardize the entire project, potentially leaving the land underutilized and failing to address the pressing housing needs. It is in the best interest of the community to support this amendment, ensuring the project can proceed and contribute positively to both the housing market and the local economy.

Thank you for your consideration. I trust that the Planning Advisory Committee will recognize the importance of this amendment and approve the request to better serve the needs of our community.

Sincerely,  
Aastha Patel, CIP Candidate  
Planner  
**Brighter Community Planning & Consulting**

CC: Planning Advisory Committee members, Rachel Gilbert, Kelly Ash