



"for the use of the inhabitants of the town of Halifax as Common forever" (1763-2013)

Mayor and Council
Halifax Regional Municipality

January 28, 2019

Your Worship and Councillors:

Re: H00456 & H00461

The above-noted matters will come before Council at its meeting on the 29th. On behalf of the Friends of the Halifax Common I am writing to ask Council not to approve either proposal, and at the very least to defer further consideration of them until other development goals have been met. Among the considerations are:

1. Prematurity. There are several aspects to this point. First, in the context of ‘substantial alterations’ motions focused on heritage properties, the whole of the idea of what is proposed for development of the block under consideration will be determined. In effect, this is the major step in the public consideration of what is being proposed by two owners for what is, cumulatively and individually, a major, and intense development undertaking. What we are suggesting is that there should not be piecemeal consideration of different aspects of what is proposed for the block. Second, it does remain the case that the Centre Plan has not yet been presented to, let alone adopted by the Council. Continuing to consider large individual development proposals, in the absence of a finalized overall Plan runs contrary to the basic idea of land-use planning, and what Council ought to be doing. Third, the block under consideration should be seen as of less urgent need than moving ahead with consideration of other sites on the Halifax Peninsula. The Robie/Carlton block is already occupied by both residential and commercial uses. Indeed, the residential component is relatively intense. At the same time, there are sites, such as the Almon St area, that are brownfield sites that are much higher priority sites for consideration of their development potential. What we are suggesting is that the Robie/Carlton block ought not to be before Council, even if Council accepts further densification of the Peninsula as a goal, until other candidate sites are considered. Indeed, Council has already approved development of a lot at the north end of Carlton St, that would achieve almost all of the increase in residential numbers HRM staff have identified as a target for the immediate area. Why is there a proposal for the Robie/Carlton block when that other project remains approved but unbuilt?

2. Undermining of Common Protection. The Robie/Carlton block is a part of the original Halifax Common. Most of the Common, even where built upon, remains dedicated to public purposes. Thus, buildings are primarily limited to educational institutions (Citadel High School, Dalhousie University), hospitals (QEII complex), the CBC, a museum, a cemetery, public amenities

(Wanderers Grounds, the Public Gardens). The one area of exception is the Spring Garden Road/Summer St area. Those areas were allowed by your predecessors to migrate to private property owners in the face of the public expense of maintaining them.

The understanding was that the private owners would maintain the properties and use them in ways that are compatible with the rest of the nature of the Common. Encroachments have been allowed on Summer Street, but there is no reason to extend these acontextual uses. We remind you that the designation for the overall Common contemplated by the draft Centre Plan is as a 'cultural landscape'.

3. Heritage Values. Council is custodian of heritage values under the Heritage Property Act. It would have been consistent with the contemplated scheme of the statute for Council to have been actively engaged in identifying, researching, and formally designating heritage properties. Unfortunately, very little of this work has been undertaken. We remind you that the Heritage Trust of Nova Scotia recommended to Council in 2012 that the Robie/Carlton block be designated as a heritage conservation district. Several buildings in the block are designated as heritage buildings. About eleven others would probably qualify, if properly researched and evaluated. Carlton Street is a rare Victorian streetscape. What is appropriate for it is protection, not to be threatened by incompatible adjacent uses. We would look to HRM to exercise its powers over building standards or to negotiate renovations and upgrades, rather than to consider abandoning the height precincts that were adopted to protect those very buildings. And to the extent that 'upgrades' are a part of what is proposed for some of the properties, they appear to be no more than any responsible owner would undertake for their properties over time. To these considerations, we add that the overall proposal is not compatible with the uses or prevailing heights on the west side of Robie Street for the block from Spring Garden to University Avenue (St Andrew's Church and the residential homes).

In sum, we ask Council either to defeat the proposals before it, or to defer their consideration until many other matters are resolved.

Yours truly,



Howard Epstein
For Friends of the Halifax Common