



November 14, 2019

Mr. Aaron Murnaghan  
Principal Heritage Planner  
HRM Planning and Development  
40 Alderney Drive, 2nd Floor  
Dartmouth, N.S. B2Y 2N5

**Re: Heritage Development Agreement Application for Stairs House, Halifax, NS (PIDs 00093146, 00093286, and 00093278)**

Dear Mr. Murnaghan:

On behalf of our client, Summer Wind Holdings Limited, WSP Canada Inc. (WSP) and Architecture49 (A49) are pleased to apply for a Development Agreement under the Regional Centre Secondary Municipal Planning Strategy (Centre Plan SMPS) Policy 5.9. The intent of this Development Agreement would be to enable a multi-unit residential building with heritage integration at 5241, 5243, 5247, and 5249 South Street (PID 00093416), 5230 Harvey Street (PID 00093286), and 5240, 5242, 5244, and 5246 Harvey Street (PID 00093278) in Halifax. The lot fronting on South Street is a Municipally Registered Heritage Property (as of 1985) and the building contained within is commonly referred to as the Stairs House.

There is an existing development agreement (DA) registered on the property (Document 27519, 6 July 1982). This DA is for the construction of a third storey addition and the conversion to a 9-unit building at 5247-49 South Street (PID 00093416). Through this application process we request to have the existing DA simultaneously discharged at the time of the new DA being approved.

The following letter includes a summary of the applicable Centre Plan Policies (Policies 5.9, 5.10, and 5.11) and outlines how the proposed development fulfils the requirements of these policies and criteria.

## 1. SUPPORTING MATERIAL

To assist with the application process, the following supporting materials are enclosed:

1. Completed Planning Application Form
2. Application Fees: \$3,000 processing fee + \$2,500 advertising deposit
3. Attachment A: Proposed Site Plan
4. Attachment B: Preliminary Building Drawings
5. Attachment C: Preliminary Landscape Plan
6. Attachment D: Preliminary Servicing Schematics
7. Attachment E: Heritage Impact Statement

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8. Attachment F: Preliminary Subdivision (Consolidation) Plan
9. Attachment G: Original Traffic Impact Statement (2016) and Addendum (2019)
10. Attachment H: Existing Development Agreement (to be discharged)
11. Attachment I: Context Map (as submitted by WSP in 2016)
12. Attachment J: Legal Description of Parcels
13. Electronic copy of all above material (USB)

Please note that a Pedestrian Wind Impact Study is underway and will be submitted for review shortly.

## 2. SITE OVERVIEW

The subject site consists of multiple legal parcels (PID 00093146, 00093286, and 00093278) which are bounded by South Street and Harvey Street in the South Barrington neighbourhood of Halifax. The three properties combined create a total site area of approximately 0.56 acres (24,400 ft<sup>2</sup>). The subject site has approximately 100 feet (30 m) of frontage on South Street and approximately 200 ft. (60 m) of frontage on Harvey Street. Existing access to the site is from both South Street and Harvey Street.

For the legal descriptions of these parcels, please refer to the attachments to this letter.

## 3. PLANNING DESIGNATION AND ZONING

The subject properties are located within the area of the Regional Centre SMPS and LUB (Centre Plan) and are designated Higher-Order Residential and zoned HR-1. The primary property, known as Stairs House (on South Street), is a Registered Heritage Property. Under the Centre Plan LUB, the following policy permits Development on a Registered Heritage Property:

*(241) Developments and uses not otherwise permitted in this By-law may be permitted by development agreement on a registered heritage property, in accordance with Policies 5.9, 5.10, and 5.11 of the Regional Centre Secondary Municipal Planning Strategy.*

A review of Centre Plan Policies 5.9, 5.10, and 5.11 can be found in table in Section 5 of this letter. A review of the Heritage Conservation Design Requirements can be found in Section 6 of this letter.

## 4. DESIGN RATIONALE

The proposed development for this site presents an exciting opportunity to integrate greater density into an existing residential neighbourhood while retaining and enhancing the heritage context of South Street. The surrounding neighborhood is a mix of medium to high density residential properties of various vintage. The South Street portion of the property is currently the location of a registered heritage building that is an excellent example of country Georgian cottage style. The site is also currently home to aged residential rental properties and is surrounded by multi-family residential properties. The new development will retain the current use while increasing urban density on the site.

One of the main design intentions is to restore the heritage building on South Street to its original form and design. This includes the restoration of several elements that have been removed over the years, the removal of the existing addition, and reinstatement of the side porch. A rear addition will be added to incorporate more residential units and this portion of the building will be continuous through the block to Harvey Street. The new addition will be sensitive to the heritage property by providing a distinct yet complementary appearance between the two buildings, stepped height increases and design elements that break up the mass of the centre portion of the project. The detailing of the new portion of the building will be limited so as not to overpower the heritage detailing of the existing building.



The Harvey Street façade will be setback to the same streetwall of the adjacent buildings and will be in-line with the existing streetwall height. This will allow for continuity of the streetscape and a more cohesive neighbourhood. The upper storeys will be setback from the streetwall allowing for the density of the site to be concentrated at the centre. The aesthetics and detailing of the building are focused primarily at the street level where pedestrian interaction occurs. The upper portions are simple in detail and light in color. The roofline slopes from the high point along the Harvey façade to the South Street façade to imply a lower mass along South Street. This allows a gentle decreased appearance of mass in relation to the heritage building.

The building has 2 floors of underground parking, 8 storeys of residential units and amenity space mixed throughout the property. Harvey Street will include at-grade townhouse style units, creating a fine-grained rhythm to the façade.

## 5. SUPPORTING SMPS POLICY REVIEW

### POLICY CLAUSE

### RATIONALE FOR DEVELOPMENT PROPOSAL

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<p><b>Centre Plan Policy 5.9</b></p> <p><i>Outside of a Heritage Conservation District, on any property containing a registered heritage building, Council may consider a development agreement for any development of change in use not otherwise permitted by the LUB, including a development that exceeds the maximum heights or maximum floor area ratios on Maps 2 and 3 of this Plan, to support the integrity, conservation, and adaptive re-use of registered heritage buildings. For a development agreement in accordance with this Policy, Council shall consider that:</i></p>	
<p>(a) <i>Any development shall maintain the integrity of any registered heritage property, or streetscape of which it is part.</i></p>	<p>Please refer to the Heritage Impact Statement in the attachments of this letter.</p>
<p>(b) <i>The impact on adjacent uses, particularly residential uses, is minimized in terms of intensity of use, scale, traffic generation, noise, hours of operation, and such other land use impact as may be required as part of a development.</i></p>	<p><b>Adjacent Residential Uses</b></p> <p>On South Street, the proposed development is located next to a 5-storey multi-unit residential building to the west and a row of 3-storey townhouses to the east. Directly east of the townhouses is an additional 4-storey multi-unit residential building. The proposed multi-unit addition to the Stairs House is set in the rear yard of the existing Stairs House, and therefore the streetwall and heritage context of the street will be maintained along South Street by the presence of Stairs House. The proposed multi-unit addition in the back of Stairs House is compatible in use and scale with the existing residential neighbourhood, which consists of many multi-units.</p> <p>On Harvey Street, the proposed development includes a 3-storey streetwall that is consistent with the height of adjacent residential uses on the street. The articulation on the streetwall maintains the rhythm of articulation along Harvey Street, and the at-grade residential doorways create a fine-grained residential character.</p>



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	<p><b>Traffic Generation</b> Please refer to the Attached Traffic Impact Statement.</p> <p><b>Noise Generation</b> The proposed development only includes residential land uses in the form of a multi-unit building. Existing buildings located to the east and west of the subject site are very similar in scale and use; therefore, it is not anticipated that there will be any disruption generated due to noise from incompatible uses.</p> <p><b>Hours of Operation</b> The proposed development only includes residential land uses and as such, there are no hours of operation.</p>
<p>(c) <i>The development is reasonably consistent with the policies of this Plan, in particular the objectives and policies as they relate to heritage resources.</i></p>	<p>Policies 5.1 – 5.11 of the Centre Plan SMPS outline various objectives and guidelines with regards to heritage resources in the Regional Centre. These policies aim to preserve and enhance the built and living heritage of places, sites, structures, and streetscapes that represent the Regional Centre’s diverse architectural and cultural heritage. As is outlined in the contents and attachments of this letter, the proposed development is in accordance with and is reasonably consistent with the intent of the SMPS policies. It aims to enhance the heritage value of an important heritage asset in the South End of Halifax, while being sensitive to the architectural context and character of the neighbourhood. The proposal is an example of how private sector re-investment in a heritage property can help to maintain its economic viability while also responding to the contemporary needs of a growing city.</p> <p>Specifically, Policy 5.9, allows Council to consider Development Agreements on registered heritage properties for developments which would not otherwise be permitted by the LUB. The consistency of the proposed development with this policy are outlined in this table.</p>
<p>(d) <i>Any new construction, additions, or renovations on the property meet the heritage conservation design requirements in the LUB, and the Standards and Guidelines for the Conservation of Historic Places in Canada, 2<sup>nd</sup> Edition.</i></p>	<p>Please refer to Section 6 of this letter for specific reference to heritage conservation design requirements.</p> <p>The character-defining elements of Stairs House, as recognized by its registration as a heritage property and as outlined in the Heritage Impact Statement attached, are in the exterior form of the building. This proposal fulfils the intent of the <i>Standards and Guidelines for the Conservation of Historic Places in Canada</i> largely based on the restoration of Stairs House being an integral</p>



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	<p>part of the project. The <i>Standards and Guidelines</i> recommend gaining a thorough understanding of the architecture of the building, documenting the exterior form, protecting and maintaining elements of the building’s exterior form, reinstating character-defining elements that have been lost over time, designing new additions in a manner that draws a clear distinction between what is historic and what is new, and designing an addition that is compatible in terms of materials and massing with the exterior form of the building.</p> <p>The approach to the work on Stairs House is generally one of preservation and re-habilitation, with restoration planned for the rear portion of the building where recent/inconsistent additions were added. Design decisions regarding the restoration of the original claddings and detailing of the home will be made after exposure and assessment of the underlying wood cladding. It is anticipated that these investigations, along with the available historical photos of the building, will allow for the conservation and restoration of the original building form in keeping with the <i>Standards and Guidelines</i>. Furthermore, design of the rear addition focuses on the presentation of a simple rectilinear, mid-rise form, with a lower three-storey streetwall along its Harvey Street elevation (in keeping with the scale of that street). The articulation of the new mass is a modern adaptation of the vernacular residential scale of the neighbourhood in general, with attention to the English classical revival Georgian principles of restraint and symmetry. These elements fulfil the recommendation from the <i>Standards and Guidelines</i> that a distinction between old and new should be drawn, but that the new design should be compatible with the historical design in materials and massing.</p>
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<p><i>(e) Any new construction, additions, or renovation fronting on a street substantially maintains the predominant streetwall height, setbacks, scale and rhythm of the surrounding properties.</i></p>	<p>The addition on the South Street fronting property (Stairs House) is in the rear of the existing building, and therefore no new construction will have street frontage.</p> <p>The Harvey Street façade will be setback to the same building line of the adjacent buildings and will be in-line with the existing streetwall height of 3-storeys. This will allow for continuity of the streetscape and a more cohesive neighborhood. The upper storeys will be setback from the streetwall allowing for the density of the site to be concentrated at the centre and will be simple in detail and light in colour. The aesthetics and detailing of the building are focused primarily at the street level, and the façade benefits from pedestrian permeability into the building through ground-oriented units with front doors along the street, in a similar rhythm to adjacent properties.</p>
<p><i>(f) The transition for any new construction, addition, or renovation with respect to the scale, form, and intensity of abutting uses.</i></p>	<p>The new addition proposed in the rear of Stairs House will be sensitive to the heritage property by providing a visual separation between the two buildings, stepped height increases and design elements that reduce the appearance of the mass of the centre portion of the project. The detailing of the new portion of the building will be limited so as not to overpower the heritage detailing of the existing building.</p> <p>The proposed addition is in keeping with the predominantly multi-unit form and intensity of the abutting uses. The building is stepped back above the 3-storey streetwall from both adjacent properties and the front lot line. This helps to ease the transition from the pedestrian realm and the adjacent buildings to the portion of the proposed building with the most mass.</p>
<p><i>(g) The development complies with Pedestrian Wind Impact and Shadow Impact Assessment Performance Standards of the LUB.</i></p>	<p>Please refer to the Pedestrian Wind Impact Assessment attached.</p> <p>It is our understanding that a Shadow Impact Assessment of the subject property is not required under the LUB.</p>



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<p><i>(h) The quality and extent of the restoration or preservation of the registered heritage property when evaluating proposals for integrated development and adaptive reuse.</i></p>	<p>The proposal recognizes the unique historic value of Stairs House through the restoration of its mass, form, and details. The intention is to re-instate its presence on South Street as the principle identifying entrance to the new residences with the interior remaining available for tenant use.</p> <p>The restoration of Stairs House will include:</p> <ul style="list-style-type: none"><li>- Restoration of exterior cladding openings and finishes.</li><li>- Partial restoration of the gabled cottage roof line of the building, particularly at its northern corners.</li><li>- Removal of the eastern wood and brick clad one-storey additions.</li><li>- Reinstatement of the eastern side porch and its associated eastern lawn.</li><li>- Restoration of the South Street entry porch, including its eastern entrance, and re-instatement of South Street fencing along the front and east lawn of the building.</li><li>- Re-instatement of the western chimney above the roof line, provided stable interior chimney remains.</li><li>- Removal of the mid-20<sup>th</sup> century rear additions.</li><li>- Retention of the existing interiors for new entry common areas, with selective alterations to suit circulation and new uses.</li></ul>
<p><i>(i) That any structures on the site which are not registered heritage buildings be addressed for their heritage value through a Heritage Impact Statement, and if found to have heritage value, must be retained and restored or otherwise integrated into the development so as to preserve their heritage value</i></p>	<p>Please refer to the Heritage Impact Statement, found in the Attachments.</p>



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<p>(j) <i>Any new construction or addition considers and is reasonably consistent with the Urban Design Manual.</i></p>	<p>The proposed design of the addition to the rear of Stairs House (with frontage on Harvey Street) has considered and is reasonably consistent with the criteria of the Urban Design Manual, which aim to foster the creation of interesting and high-quality buildings, streetscapes, and neighbourhoods.</p> <p>The proposed Stairs House development intends to provide a high-quality design that is consistent with urban design and architectural best practices. The proposed building materials are of high quality and are anticipated to significantly improve the physical and visual appearance of the overall streetscape. The proposed base of the building will create an enjoyable pedestrian experience along the street by creating a consistent relationship between buildings and the sidewalk. The fine-grained streetwall also adds to the variation of the pedestrian experience, and the building entrances are frequent and residential in nature, fostering a permeability between the public and private realms.</p> <p>The location of the building lends it well to increased density, given that there are countless amenities located within a short walking distance. Increased density at this site will help to enhance the complete community that has evolved organically in the neighbourhood.</p>
<p><b>Centre Plan Policy 5.10</b></p>	
<p><i>Any development agreement considered in accordance with Policy 5.9, shall require incentive or bonus zoning for the property and the requirements of the LUB respecting incentive or bonus zoning shall apply, including that a development permit shall not be issued unless a waiver under section 18 of the Heritage Property Act has been registered on the property. Any development that proposes to demolish registered heritage building or buildings shall not be eligible for a heritage development agreement. Council may only consider a development agreement in accordance with this policy or policy 5.9 if:</i></p>	<p>Section 18 of the Heritage Property Act of Nova Scotia requires that any substantial changes to a heritage property only be made following the acquisition of substantial alteration permit. The application for substantial alteration has been submitted to HRM simultaneously with the current Development Agreement application.</p> <p>The application does not propose to demolish the registered heritage building on the site.</p>
<p>(a) <i>Site plan approval has not been granted for the development; and</i></p>	<p>No site plan approval has been granted for any of the subject properties.</p>





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<p><i>(b) Any proposed addition is not located within the existing front yard of the registered heritage building.</i></p>	<p>The proposed addition is located in the rear yard of Stairs House.</p>
<p><b>Centre Plan Policy 5.11</b> <i>An application for a development agreement in accordance with Policy 5.9 that includes new construction or addition shall include a site and context analysis, and a design rationale that demonstrates how each of the design criterion contained in Urban Design Manual has been considered and addressed in the proposed development.</i></p>	<p>Please refer to the Design Rationale in Section 4 of this letter.</p>

## 6. APPLICABLE LAND USE BY-LAW POLICY REVIEW

In addition to the Development Agreement policies found in the Centre Plan SMPS, Policy 5.9(d) requires that the proposal be consistent with Heritage Conservation Design Requirements in the LUB.

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<p><i>(141) Character-defining elements of registered heritage buildings shall be conserved and remain unobstructed.</i></p>	<p>The proposal includes the conservation and restoration of character-defining elements of Stairs House.</p>
<p><i>(142) New window and door openings on registered heritage buildings shall match established patterns (materials, design, detail and dimensions)</i></p>	<p>There will not be any additional windows or doors added to Stairs House in the restoration.</p>
<p><i>(143) Architectural elements shall be preserved, such as pilasters, columns, cornices, bays, and parapets.</i></p>	<p>All existing architectural elements will be preserved, and some, including a portion of the gabled cottage roofline, the east side porch, and the western chimney, will be restored to their historical state.</p>
<p><i>(144) Archival evidence shall be used to support the rehabilitation and restoration of character-defining elements on registered heritage buildings, or on registered heritage properties.</i></p>	<p>Stairs House is valued as an important historical asset in the original suburban expansion of Halifax, not only for its Georgian architectural style but also for the associations with prominent Haligonian families who throughout history had ownership over the house. Based on research conducted for the Heritage Impact Statement, there is substantial archival evidence available to guide</p>



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	<p>the restoration of this property. It has been used to create preliminary plans to restore and highlight many of the character-defining elements and will continue to be used for reference as a more detailed restoration plan is created.</p> <p>Please refer to the Heritage Impact Statement in the Attachments of this letter for further detail.</p>
<p><i>(145) Historic building facades on registered heritage buildings shall be retained and rehabilitated or restored using traditional materials.</i></p>	<p>The project proposes to rehabilitate the façade of Stairs House and proposes to retain the existing original interior of the house, which will function as common spaces/amenity spaces for residents of the new addition.</p> <p>Please refer to the Heritage Impact Statement in Attachments of this letter for further detail.</p>
<p><i>(146) Brick or masonry facades shall be maintained and restored on registered heritage buildings. The painting of brick or masonry facades is prohibited.</i></p>	<p>Stairs House features an Ironstone foundation with exterior plaster parging that has been rendered to resemble stonework coursing. This foundation will be maintained and restored in the rehabilitation project. Additionally, the house originally featured an east and a west chimney. The interior and exterior portions of the east chimney still exist in the contemporary structure and will be restored and repaired as necessary. The portion of the west chimney above the roofline was removed during a 20th-century renovation. Given that a stable interior chimney remains, the intention of the project would be to restore the exterior portion of the chimney as well. While not extensive in brick or masonry, these small features, once rehabilitated, will help to improve the historic character of Stairs House and, in the case of the chimneys, reinstate the symmetry of the cottage construction.</p>
<p><i>(147) The podiums or streetwalls of new developments in a heritage context shall maintain the same or similar cornice line height established by abutting registered heritage buildings</i></p>	<p>On the South Street frontage, the only building with street frontage will be Stairs House, the cornice line of which will be maintained.</p> <p>On the Harvey Street frontage, the proposed addition features a three-storey streetwall, in keeping with the three-storey cornice line heights on adjacent buildings. Above the streetwall height, the building is stepped back from the streetwall, thus giving the building a similar street-oriented scale in the pedestrian realm as other buildings on the street.</p>
<p><i>(148) Subject to subsection 93(4), any portions of new developments in a heritage context that are taller than the cornice line of an existing abutting registered heritage building shall be stepped back from the streetwall.</i></p>	<p>No abutting buildings on the Harvey Street frontage are registered heritage buildings. However, the cornice line height of the streetwall on Harvey Street is in keeping with the three-storey cornice line heights on the abutting, more historical buildings.</p>



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<p><i>(149) Where a detached building constitutes a new development in a heritage context and where it abuts the same streetline as the registered heritage building, any portions of the new development that are taller than the cornice line of the registered heritage building shall be stepped back 3 metres on the side that abuts the heritage building.</i></p>	<p>There are currently no registered heritage homes on abutting on Harvey Street.</p> <p>On South Street, there are three other registered heritage homes located on the same block as Stairs House: the G.E. Ahern House (5266 and 5270 South Street), the Crofton-O’Leary House (5274 South Street), and the Allie Ahern House (5308 South Street). These registered heritage properties form part of a relatively intact example of the early suburban expansion of downtown Halifax. The proposed addition to Stairs House steps back on the east, west, and north elevations above three storeys (the cornice line height).</p>
<p><i>(150) Architectural elements of existing abutting registered heritage buildings shall be used as a reference in the design of new development in a heritage context by:</i></p> <p><i>(a) Incorporating articulation established by vertical and horizontal architectural elements of the registered heritage buildings (i.e. columns, pilasters, cornice, architectural frieze, datum lines, etc.)</i></p> <p><i>(b) Incorporating proportions and vertical spacing of the registered heritage buildings’ windows; and</i></p> <p><i>(c) Where new development in a heritage context is located at the ground level, maintaining the proportions and transparency of the registered heritage buildings’ storefront and façade elements.</i></p>	<p>The only existing registered heritage building which abuts the proposed new building (the addition) is Stairs House. However, there are abutting buildings on Harvey Street, where the new addition will have frontage, which have historical value and have therefore been taken into consideration under this clause.</p> <p>(a) The articulation established by Stairs House on the South Street frontage will be maintained, as Stairs House is slated for rehabilitation. The proposed addition, which has frontage on Harvey Street, aims to continue the articulation pattern of the existing streetscape by approximately matching the cornice lines of the adjacent buildings. Additionally, the proposed addition breaks down vertical rhythm of the façade to emulate similar patterns in the abutting buildings along Harvey Street.</p> <p>(b) The windows on the proposed addition feature a similar size, shape, and aspect ratio to those in Stairs House but have been simplified so as to allow Stairs House to remain the characterizing building on the property. Similarly, the windows in the proposed addition are punched (with the exception of the penthouse floor), in keeping with the window design on Stairs House. Simplified version of Stairs House windows but they feature a similar size and shape. Finally, the proposed addition features alternating asymmetrical windows which are reflective of the east- and west-side windows on Stairs House and help to add visual interest and distinction to the building.</p> <p>(c) Stairs House does not feature storefront on the ground level and is not being altered (except to restore the building and its façade).</p>
<p><i>(151) (1) If proposed on a registered heritage building, awnings and canopies shall be:</i></p> <p><i>(a) Designed to fit within the dominant horizontal structural elements of the lower</i></p>	<p>There are no proposed canopies on Stairs House.</p>



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<p><i>façade and not obscure significant architectural features;</i></p> <p><i>(b) Located between vertical columns or pilasters to accentuate and not to obscure these elements;</i></p> <p><i>(c) Designed to complement the fenestration pattern of the registered heritage building; and</i></p> <p><i>(d) Constructed using heavy canvas fabric or similar material in either a solid colour or striped. The use of retractable awnings is encouraged. Vinyl and high gloss fabrics and internally-illuminated awnings shall be prohibited.</i></p> <p><i>(2) Metal or glass awnings or canopies may be permitted on a registered heritage building if designed to complement historical architectural elements.</i></p>	
<p><i>(152) Lighting hardware shall be located so that it does not disfigure or conceal any significant architectural feature of the registered heritage building. Where it is not possible to hide lighting hardware, it should be compatible with the building's architecture and materials.</i></p>	<p>Lighting hardware will be determined during the detailed architectural restoration design. The intention of the project is to restore the building to its historical character. Therefore, any lighting hardware, should it be necessary, will be in keeping with the building's architecture and materials.</p>
<p><i>(153) Lighting shall be directed to accentuate or emphasize the architectural features of registered heritage buildings or their signage.</i></p>	<p>Lighting hardware will be determined during the detailed architectural restoration design. However, the intention of the project is to highlight the unique architectural features. As such, lighting will be used in a strategic way so as to accentuate or emphasize these features from the purview of the pedestrian realm.</p>



## 7. CONCLUSION

In conclusion, this development application aligns itself with the goals, objectives, and policies of the Centre Plan. It does this by:

- ✓ Proposing a medium-density building in keeping with adjacent uses and scales in an existing complete community which is targeted for growth and where local businesses can benefit from more people living in the neighbourhood.
- ✓ Restoring and rehabilitating Stairs House, a registered heritage property, in keeping with the recommendations of the *Standards and Guidelines for the Conservation of Historic Places in Canada*.
- ✓ Emphasizing appropriate scale, setbacks, stepbacks and a fine-grain streetwall on the Harvey Street-fronting addition to enhance the pedestrian realm along that streetscape.

This development proposal makes a positive contribution to the neighbourhood by increasing the viability of an important heritage asset which helps to retain the historic context of the neighbourhood. In addition, it makes a positive contribution to the growing regional centre by gently increasing density in an established neighbourhood where future residents will have ample access to existing amenities, sustainable transportation options, and community resources.

We trust that this information is sufficient for the application process and we look forward to working with HRM's as we move ahead with the planning process for this application. Should you have any comments or questions, please do not hesitate to contact me.

Yours sincerely,

Christina Lovitt, LPP, MCIP

Manager, Planning – Atlantic Canada

CL/jl

cc: Eric Burchill, Southwest Properties; Louann Scallion Morine, Southwest Properties; Michael Christian, A49; Jenny Lugar, WSP

Encl.

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