Attachment E - Applicant's Rationale Letter



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March 8th, 2019

Tyson Simms, Planner III Urban Plan Amendments Team HRM Planning & Development 2nd floor, 40 Alderney Drive Dartmouth, NS

Re: Case 20218, Spring Garden West, Carlton Street/Spring Garden Road/Robie Street

Dear Tyson,

This is in response to our earlier correspondence and discussions regarding this plan amendment application.

Inclusion of Heritage Properties within Policy Set for SGW Project

As you are aware, Regional Council has approved our requested substantial alterations to the four registered heritage properties on Carlton Street. Relative to the planning framework that will be applied to our new buildings, Dexel suggests that our Carlton Street properties be included within the development agreement policy set. This would reflect the fact that the entire Spring Garden West project with buildings both new and old will remain under one ownership and as such is being comprehensively planned as a whole. This unified approach will allow the development agreement to deal with use and maintenance of the heritage buildings, and also address detailed design of rear yard amenity spaces and provision of property line buffers such as fences and plantings between the heritage buildings and the new project.

Revisions to Project

Several changes have been made to the massing of the project based on public comments and review by design and planning professionals. These are reflected in the attached drawings, which show an updated heights and massing framework. The changes are:

- The mid-rise section of the building (floors 6 to 8) has been reduced to lessen the heavy visual prominence of the base of the building, to emphasise the slender nature of the towers, and to increase sunlight penetration to Spring Garden Road. This is achieved by a reduction in height of the project between the two towers to 6 floors and by reducing the overall footprint of the mid rise floors.
- In order to maintain the needed FAR for this project and to continue to enable the extensive proposed public benefits, the displaced mid-rise floor area noted above has been relocated by adding 4 floors of height to the narrow tower at Spring Garden/Robie.
- The massing of the building adjacent to the registered heritage property at 1494 Carlton Street
 has been reduced to create a more appropriate relationship between old and new. The height of
 the building has been reduced from 3 floors to 2, to carry the roof line of the heritage building
 along Spring Garden Road. The cornice line of the heritage building will also be continued along







Spring Garden Road by the top of the first floor. Floors 3 and above are then setback 11.5 m from the rear property line of the heritage buildings to create a strong transition.

Setbacks of certain parts of the project have been increased in order to ensure appropriate separations from proposed development on the adjacent land assembly.

Community Engagement

The proposal for Spring Garden West has been developed and continually refined based on extensive public feedback. Dexel hired the best engagement team possible and sought to come up with the best project using a process similar to that used by HRM for design of the new Spring Garden Road library. This was the first pre-application engagement process by a private developer in the HRM. This has been a long process (6 months, 6 meetings, 1000s of hours and it continues today), far exceeding HRM's own requirements for community engagement on either public or private development proposals. We have been able to consider and incorporate hundreds of ideas and suggestions and to address reasonable concerns that have been raised, and to garner broad public support for the project as it now stands. We continue to be open to public input as we further advance and refine the design of the project. The complete process is displayed online at www.livewellonsgw.com

Community Benefits

Dexel is committed to adding to the neighbourhoods in which we build. Our projects are always designed to create the best fit possible. In the case of Spring Garden West, the project has been not only carefully designed to fit the site, respect surrounding neighbourhoods, and contribute to lively pedestrian-oriented streets but to provide substantive and meaningful community benefits unlike any other development to date in HRM. Dexel is proposing to provide, in return for approval of a project with the needed FAR to make the project feasible, community benefits across nine categories:

- Restoration and maintenance of 4 registered heritage buildings in the historic Carlton Street streetscape,
- Provision of new public space in an atrium at the corner of Spring Garden/Robie,
- Provision of public living room, inspired by the Halifax Central Library, overlooking Spring Garden/Robie,
- Contributions to the improvement of Balcom Park at the corner of Robie/Coburg,
- Undergrounding of utilities adjacent to the project on Spring Garden Road and Robie Street, and undergrounding of overhead service wires to the 4 Carlton Street properties,
- Provision of affordable and social housing units over an extended period of time,
- Provision of subsidized office space for non-profits and NGO,
- Public underground vehicle parking,
- Free public underground bike parking as well as bike parking areas integrated into the streetscape,
- Streetscape improvements in the form of a integrated linear park, and
- Universal design with the guidance of universal design architect, Anne Sinclair, and the Rick Hanson Accessibility Standards









Public streetscape safety improvements - 24/7 lite sidewalk and snowmelt sidewalk system.

The value of these public benefits has been determined to be \$5.7 million (2016), far exceeding that which would normally be required by HRM through a bonusing program based on additional FAR above 5.0 to reach the desired FAR of 8.72. Please see Attachment A for further detail.

Alignment with Centre Plan Parameters

The Spring Garden West project is within one of the five Centres proposed by Centre Plan for intensive development. The size of our land assembly at 1.2 acres enables a true mixed use project with two striking towers that will be the slimmest to date in HRM, a vibrant pedestrian streetscape, and new public amenity spaces, while also enabling the restoration of four heritage buildings within the significant Carlton Street Victorian streetscape. At the same time the proposal meets current best practices for massing and urban design for large scale projects. The community benefits of the project are wide-ranging across numerous categories, which is unprecedented in Halifax.

The draft Centre Plan documents initially identified a maximum building height of 20 floors within the Centres, which is an arbitrary and artificial limit for those sites with the size and context that can support greater height. At Dexel we firmly believe, as HRM begins to enable the next generation of taller and slender structures, that exemplary design must be demonstrated. Our proposal demonstrates the type of design and massing that allows taller forms to work and contribute to active, vibrant pedestrian environments. It is our understanding that the next draft of Centre Plan will not contain any height limits in the Centres but will instead use FAR. This approach is more reasonable and allows us to work the massing needed to create a feasible project into the best form for this site. Lower height maximums would necessitate heavier massing for the low rise podium and mid-rise floors and require larger tower floor plates, with the results of negative effects on the Carlton Street historic streetscape, greater shadow impacts on sidewalks and public spaces, and would have implications for development of the adjacent College Street land assembly. Our proposed FAR is 8.57 (not including the heritage properties), which is reasonable given the site's location within a major Centre as identified under Centre Plan and given the broad scope of public benefits that we are proposing.

Compliance with Key HRM Planning Principles

The project draws heavily on its context within the Spring Garden Road Centre that is proposed under Centre Plan, and provides a clear opportunity for a signature development to drive the needed intensification of the urban core, while being designed to fit the immediate area and take adjacent proposals into consideration. The project demonstrates compliance with the key principles approved by Regional Council to guide staff's evaluation of the 22 MPS amendments in advance of Centre Plan as outlined in Attachment B

Heritage Policy Evaluation

The Regional MPS establishes specific criteria to be met for developments adjacent to registered heritage properties. The Spring Garden West project which encompasses 13 existing properties includes 4 registered heritage properties. These properties are considered by Dexel as an integral part of the development. Alterations to the buildings and subdivision of the rear of the lots have been addressed by



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the Heritage Advisory Committee pursuant to the Heritage Conservation Standards adopted under the Regional MPS, and have been approved by Regional Council. The restoration of the heritage properties will take place as one part of the larger development, once approved. The heritage buildings will remain on their own lots, but are intended to be included within the development agreement that will apply to the entire project. Attachment C provides a detailed evaluation of how the project complies with the heritage policies of the Regional Plan.

Summary

This submission demonstrates how the Spring Garden West project meets HRM's intensification targets, urban design best practices, and standards for projects that abut registered heritage properties. Not only does the project meet the highest standards of design, it will provide clear and measurable highvalue community benefits across nine categories worth millions of dollars.

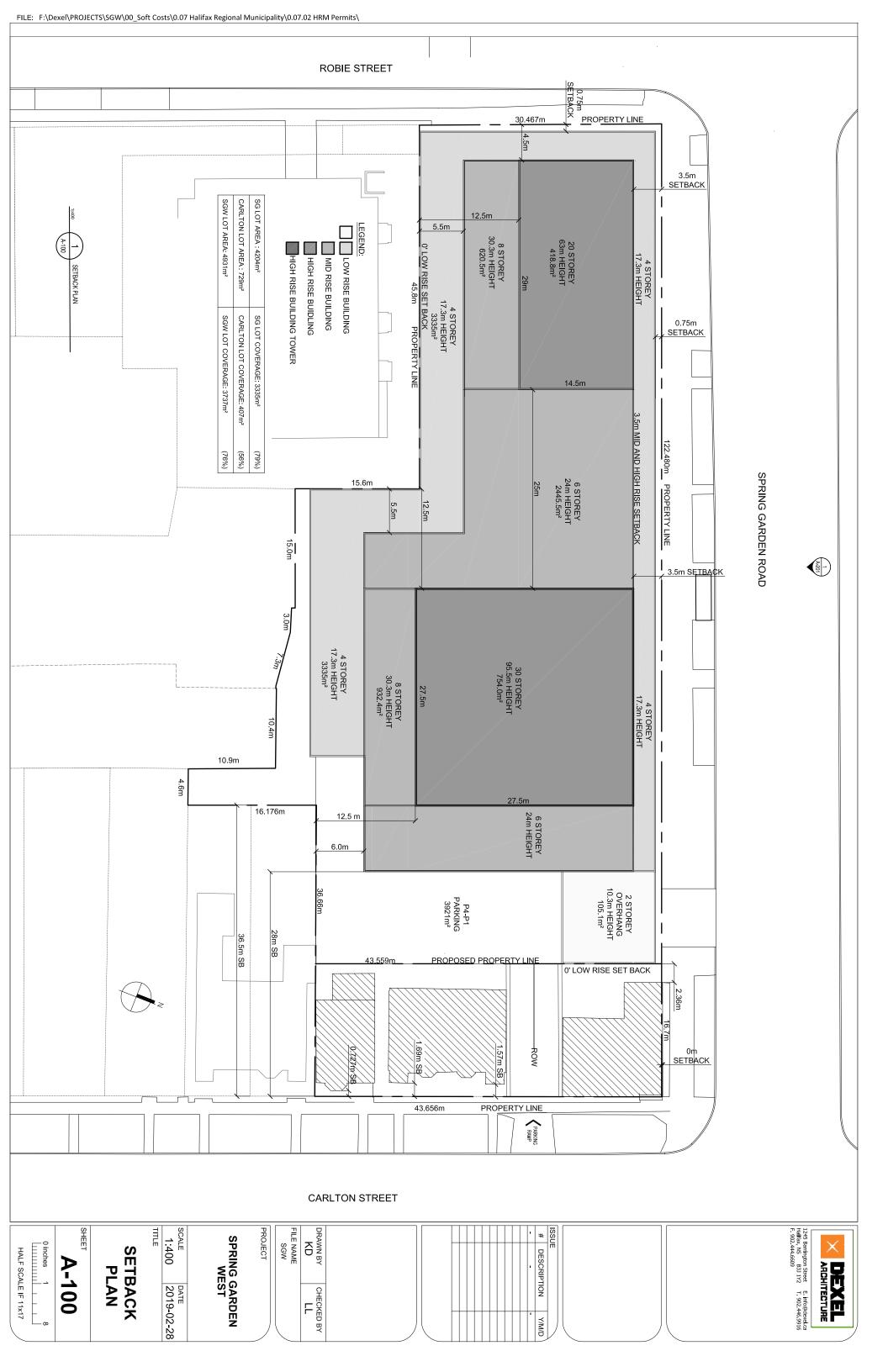
Going forward, Dexel wishes to confirm that the general parameters of the project relative to land use, massing, height and community benefits are acceptable to HRM Planning. Following that, the exterior design of the project can be further refined. It is our hope that the MPS amendment and DA processes continue to advance concurrently and in a timely manner.

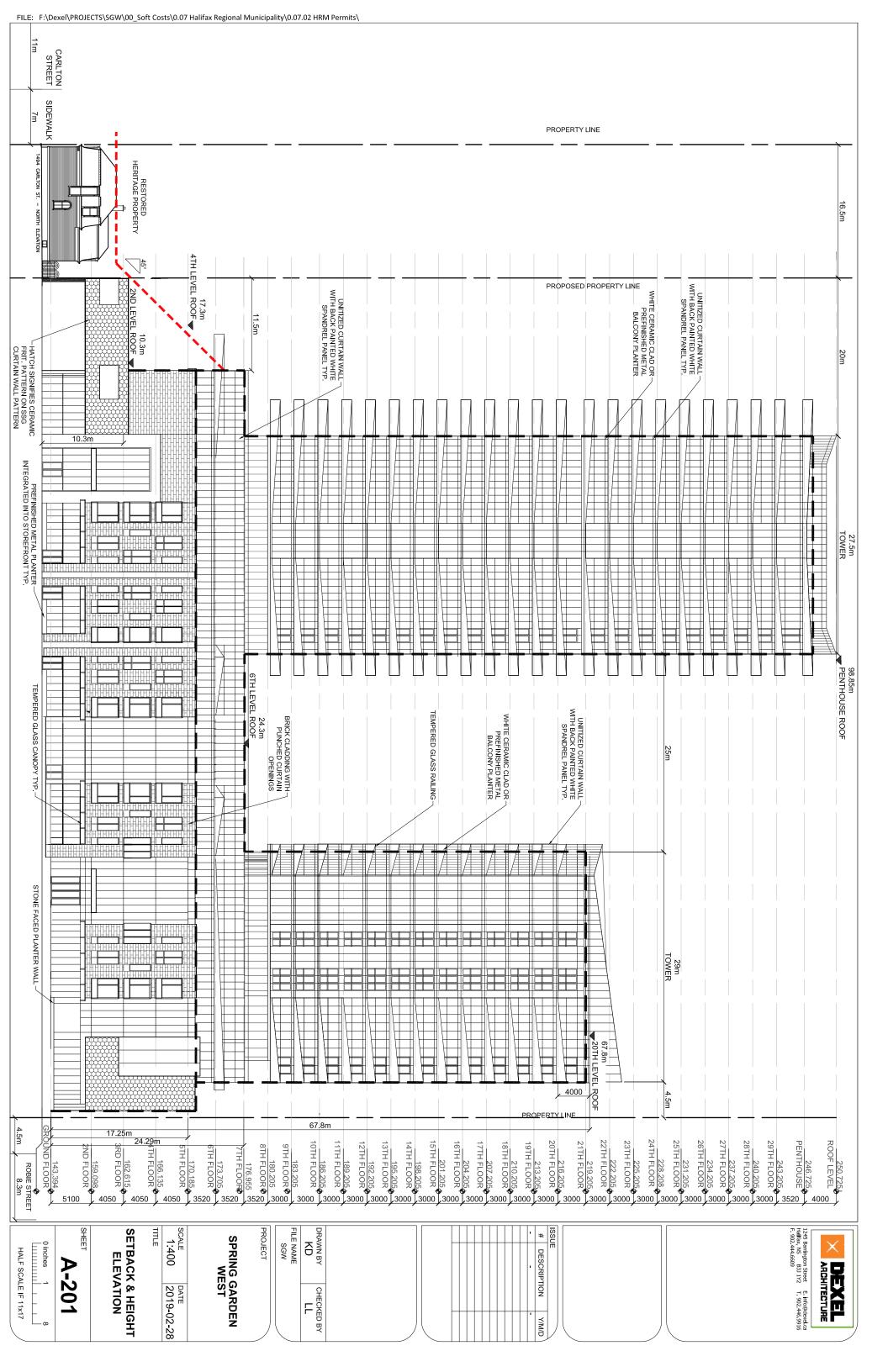
We look forward to your response and confirmation of the next steps needed in order to advance this application.

Yours truly,

Original Signed

Louis Lawen President & CEO Dexel Developments Ltd.







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Attachment A Detailed Evaluation of Public Benefits of the Spring Garden West Project



Cantwell & Company Consulting Ltd.

Real Estate Consulting Property Management Development 5845 Point Pleasant Drive Halifax, Nova Scotia Canada B3H 1B7 Cell (902) 497 7338 ross@cantwellco.com

August 17th, 2016

Mr. Louie Lawen, P.Eng, President Dexel Developments Ltd 1245 Barrington Street Halifax, NS B3J 1Y2

Re: Review of Public Benefits: Spring Garden West

Dear Mr. Lawen:

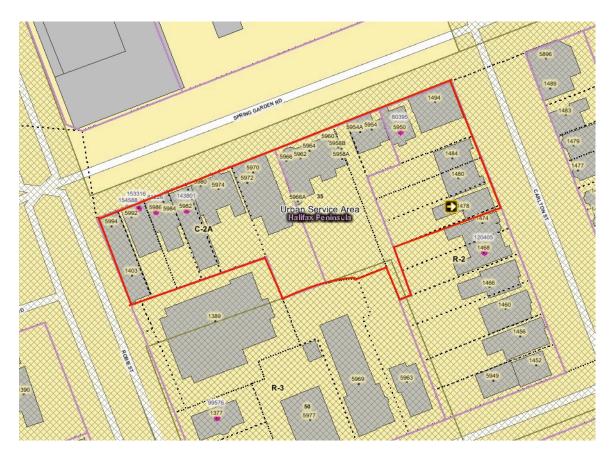
As requested, we have reviewed the proposed development concept for Spring Garden West (SGW) and have quantified the public benefits associated with this project. The intent of this letter report is to help the Halifax Regional Municipality quantify the value of the public amenity benefits being proposed by Dexel Developments for the site at 5958 Spring Garden Road.

AS OF RIGHT DEVELOPMENT

The following graphic illustrates the location of the subject properties (outlined in red), as well as their current zoning. The property includes all frontage on Spring Garden Road from Carleton to Robie Street. The western portion of the site, including the first six buildings from Robie Street heading east, are presently zoned C-2A. Several buildings in the middle of the site are zoned R-3 while the eastern portion of the site along Carleton Street is zoned R-2.

As there are half a dozen high-rises (12 to 16 to 20 floors) in the immediate area surrounding this property (e.g., Spring Garden Professional Centre, Dalhousie Medical School, Embassy Towers, Spring Garden Terrace, Garden Crest and Summer Gardens), the C2-A zone doesn't seem to be congruent with the surrounding neighbourhood, which is predominantly zoned for R-3 or RC-3 uses. The exception would be the older homes on Carleton Street, as this is an intact streetscape with several buildings having municipal heritage designation.

While there is currently a 35 foot height limit on this property, a draft growth scenario prepared by HRM staff for the Centre Plan indicates that this corner is being designated as a Primary Growth Area, which will be deemed to be appropriate for moderate and tall building options.



Although the final Centre Plan is not yet available to help us fully assess an "as of right development option", the area has been identified as a Primary Growth Area that would allow tall buildings, therefore we have made the assumption that a floor area ratio (FAR) of about 5.0 would be used as a baseline, or "pre-bonus height".

ESTIMATE OF PRE-BONUS DENSITY	Sq. Ft	Sq. M
Spring Garden West - Gross Site Area	53,110	4,934
Times Floor Area Ratio (FAR)	5.0	5.0
Equals Allowable Pre-Bonus Density	265,550	24,670

Applying an FAR of 5.0 to the site of the assembled property (53,110 SF or 4,934 Sq. Meters) indicates that approximately 265,550 SF of building (24,670 SM) would be allowed "as of right". This is the baseline that any future public amenities should be measured against.

PROJECT DESCRIPTION.

The following plans illustrate the proposed project as described to Cantwell & Company for the preparation of this letter report. The plans include two towers (16 and 29.5 floors) over a common podium with a four story street wall along Spring Garden Road. The existing older buildings on Carleton Street are retained and restored. The park on the western side of Robie Street is upgraded as a public amenity for the neighbourhood.







Corner of Spring Garden Road and Robie Street - Facing South



In total, the plan includes 372,118 SF of total space (34,572 SM), including 21,200 SF of retail (1,970 SM), 61,500 SF of office space (5,714 SM), 251,230 SF of residential space (23,340 SM), 10,730 SF of residential amenity space (997 MS), and 17,587 SF of circulation space (1,634 SM). The three older buildings on Carleton Street are renovated, which provide another 9,871 SF of mixed use space (917 SM).

CALCULATION OF POST BONUS DENSITY AMENITY VALUE.

The theory of bonus density incentives is that the developer shares the incremental value created with the community by provide public amenities such as parks, affordable housing, etc. In calculating the post bonus density for this site we are not using the current zoning as HRM is in the process of amending and consolidating all the secondary plans on the Halifax Peninsula and Downtown Dartmouth (i.e., the Centre Plan) and therefore some increase in density will be provided regardless of how this site is developed. As mentioned previously, while we do not know the final FAR that the Municipality will assign to this property, based on our review of adjacent properties as well as preliminary feedback from HRM (i.e., this area was designated as a Primary Growth Area), it would appear that a value of 5.0 is reasonable.

The following table calculates the value of the post bonus density for this site assuming that the pre-bonus density is an FAR of 5.0.

CALCULATION OF POST BONUS DENSITY - SPRING GARDEN WEST Cantwell & Company Consulting					
Cantiwell a company consulting					
Space Description	Proposed	As of Right	Difference		
Retail Space	1,970				
Office Space	5,714				
Residential Space	23,340				
Amenity Space for Residential	997				
Circulation Space	1,634				
Total New Floor Area	33,655				
Heritage Buildings - Carlton Street	917				
Total Gross Floor Area in Sq. M	34,572	24,670	9,902		
Gross Site Area	4,934	4,934			
Floor Area Ratio	7.0	5.0			
VALUE OF INCREMENTAL SPACE					
Incremental Sq. M of Buildable Space	9	Sq. M	9,902		
Value per Sq. M		Sq. M	\$430.49		
Times Land Value Coefficient 67					
Value for Bonus Density Agreement			\$2,841,828		

The development has a proposed 34,572 square meters, which is 9,902 square meters more than an as of right scenario (24,670 SM). Applying a market value of \$40 per buildable square foot (\$430 per SM) and then applying a 67% value coefficient, produces a value of \$2,841,828 for the buildable space that is in excess of the as of right scenario.

This is the cumulative amount of public amenity benefits that the developer should provide to the community in order for the trade off to be considered a fair bargain. The following report sections calculate the value of specific features that the developer is proposing in order to meet their obligations under the bonus density program. These public amenities have been identified based on the community consultation program that was implemented for Spring Garden West

1. AFFORDABLE HOUSING.

Housing affordability is a growing problem in most major cities, and Halifax is no exception. Although the Province of Nova Scotia (through Housing Nova Scotia) is responsible for the creation of affordable housing, the problem is so complex that it has had a limited impact in Halifax over the past several decades. To date, most of the affordable housing that is being created by Housing Nova Scotia is contract based, typically for a set period of time. This might include Rental Supplements (issued by Housing Nova Scotia) that help write down the cost of rental housing, or through a capital contribution that creates 15 years of housing affordability. While both programs can help create affordable housing, they don't provide a long-term solution. In addition, the most acute need for affordable housing tends to be in urban locations on the Halifax Peninsula, yet very few of the contracts entered into by Housing Nova Scotia are for areas such as the Spring Garden Road corridor.

As part of its amenity contribution to the Spring Garden neighbourhood, Dexel Developments has proposed the creation of 16 units of affordable housing, which would be made available to households earning 80% or less of the median income for the area. These units would be affordable in perpetuity (i.e., for the life of the project, not just for a 15 year timeframe) and as such, would create high quality affordable units in a high demand location. The rent of \$1,275 per month would be affordable (30% of income) to a family making \$51,000 per year; this is 60% of median income for Halifax in 2014¹. The following table calculates the value of these affordable units to the community, by discounting the net rental differential (market rental rate minus the affordable rental rate) over the life of the project.

^{1.} http://www.statcan.gc.ca/tables-tableaux/sum-som/l01/cst01/famil107a-eng.htm

CALCULATION OF VALUE - AFFORDABLE HOUSING

Description	Market		Af	fordable	Difference	
Monthly Rental Rate	\$ 1,700		\$	1,275	\$	425
Times 12		12		12		12
Annual Rental Rate	\$	20,400	\$	15,300	\$	5,100
Times Number of Units						16
Equals Annual Lost Revenue					\$	81,600
Less Reduced Property Taxes		16	\$	500		(\$8,000)
Net Annual Cashflow Reduction					\$	73,600
Divided by Valuation Cap Rate						4.75%
Equals Reduction in Project Value		16	\$	96,842	\$	1,549,474

Assumptions: All units are 850 SF Two Bedrooms

Market Rent is \$2 per SF per Month, Affordable Housing is \$1.50 per SF per month

2. AFFORDABLE OFFICE SPACE.

While the concept of affordable housing is fairly well known, there has been a limited amount of discussion about the need for affordable office space in gentrifying neighbourhoods. This is starting to change as development pressure on the Halifax Peninsula is causing large increases in commercial property tax assessments, which force landlords to further increase their rental rates in order to recover the additional property taxes. The growing shortage of affordable commercial space negatively impacts small local businesses and nonprofit organizations, and reinforces a trend towards national caliber tenants who can pay the increased rental rates.

As part of its amenity contribution to the Spring Garden neighbourhood, Dexel Developments has proposed allocating 3,750 SF (348 SM) of the 61,500 SF (5,714 SM) of commercial space (6% of the total) as affordable office space for local businesses and nonprofit organizations. This space would remain affordable in perpetuity and would allow interesting local businesses to occupy what would otherwise be corporate offices.

The following table calculates the value of this affordable office space to the community, by discounting the net rental differential (market rental rate minus the affordable rental rate) over the life of the project.

CALCULATION OF VALUE - AFFORDABLE OFFICE SPACE

Description	Market		Affordable		Difference	
Net Rental Rate per SM	\$	258.33	\$	172.22	\$	86.11
Times SM of Afffordable Office Space					348.39	
Equals Annual Lost Revenue					\$	30,000
Less Reduced Property Taxes per SM		348	\$	21.53		(\$7,500)
Net Annual Cashflow Reduction		SM			\$	22,500
Divided by Valuation Cap Rate						6.00%
Equals Reduction in Project Value					\$	375,000

Assumptions: Rent does not include operating costs

The calculation assumes that the net rent is reduced by 33% from \$258 per SM to \$172 per SM. This reduces the gross revenue from this space by \$30,000 per year, although this would be offset by a reduction in operating expenses (i.e., property taxes) of \$7,500. Once capitalized at 6%, the net present value of this benefit is \$375,000 over the life of the project.

3. PUBLIC ATRIUM AND LIVING ROOM

Dexel Developments envisions providing a four (4) storey atrium entrance to the professional offices with views to the surrounding streetscape. As part of the public consultation for this project, the public requested that the development be a year-round destination, and that the atrium provide public space to host public performances and cultural events, health related presentations, a healthy food market, a speaker's corner and community group gatherings. This space will be available to the public 365 days a year.

The atrium is roughly 4,400 SF (409 SM) and will cost \$500 per SF (\$5,379 per SM) to construct, or \$2,200,000 in total. As roughly half of this space is required as part of the development, the developer will only claim half of the cost (\$1,100,000) as a public benefit.

4. INDOOR PUBLIC BIKE PARKING.

The development plan includes a 400 SF (37 SM) indoor bike storage facility with shower for use by the general public. This is in addition to the bike facilities that will be provided the building's tenants. The intent of including this bike storage facility is to provide additional bike infrastructure that can be used by the surrounding neighbourhood, thus helping to promote alternative forms of active transit. The estimated cost of this improvement is \$100,000.

5. PARK (SW CORNER OF ROBIE AND COBURG)

Public greenspace can be a highly used and valued amenity to the local community. While the municipality recognizes the benefits of new parks and open space in suburban areas (e.g., most subdivision bylaws require a greenspace contribution), there is typically not such a requirement for urban developments. For this project, Dexel Developments would like to change this by funding the creation of a park at the corner of Robie and Coburg Streets.

There is currently a small (6,706 SF, 623 SM) orphaned triangle of land/grass at the western corner of Coburg and Robie Streets, which receives very little - if any - public use. One of the reasons this space isn't used is that its cut off from the sidewalk by a small section of Coburg Road that allows cars heading east on Coburg to turn south on Robie without waiting for traffic lights. Research on this area indicates an elevated level of pedestrian incidents in this small section of street, and ideally this section would be closed to increase the size and functionality of the park. By including the street right of way (5,899 SF / 548 SM) with the existing green space, the combined area is 12,605 SF or 1,171 SM.

The plan calls for the closure of this short section of street, and the creation of a new park, which is linked directly to the regional sidewalk system. Based on estimates prepare by the developer, the value of this project is estimated to be \$630,250 (12,605 SF of space at \$50 per SF).

6. STREETSCAPE IMPROVEMENTS.

New development in an urban environmental typically requires removing the sidewalk during construction and re-instating the same sidewalk once construction is complete. The municipality has no specific streetscape requirements other than reinstating a brushed concrete sidewalk.

For this project, Dexel Developments is proposing to add a number of streetscape improvements along both Spring Garden Road and Robie Street, including: planter boxes for trees; street furniture (e.g., benches) and high quality light standards. Dexel would also add inground heating under the new sidewalk to keep this free of snow and ice all winter (including the on-going cost of maintaining that system), as well as sidewalk lighting. The value of these amenities has been estimated to be worth \$787,808 (12,840 square feet of sidewalk at \$56 per SF OR 1,307 SM at \$603 per SM).

7. PUBLIC PARKING.

In an urban environment, as vacant or under utilized properties are redeveloped, the demand for public parking can increase. On the eastern end of Spring Garden Road (i.e., near Queen Street), parking is at a premium, and demand will continue to increase as additional vacant lots are redeveloped. Although the western end of Spring Garden Road (e.g., at Robie Street) is a minor retail destination at the present time, this will increase in response to new development like the proposed building.

Dexel Developments has anticipated the future need for public parking in the immediate area and has proposed approximate 300 parking stalls for the commercial space and general public. Assuming a ratio of 2 spaces per 1,000 SF of office and retail space, about half of these spaces are needed by the developer, while the remainder (approximately 150 spaces) would be available as public parking.

As the proposed parking will generate operating revenue, most of the cost will be self-sufficient. The major cost to the developer in providing this additional space is the need to adjust the structural column grid from a cost effective 20 by 20, to a more functional (for public parking) 30 by 30 foot grid. This will also necessitate increasing the concrete floor form 8" to 10" in order to transfer the additional loads. The cost of

these upgrades has been estimated at \$5 per SF for 120,000 SF (\$54 per SM for 11,148 SM) or \$600,000. The developer is looking for a credit of 50% of this amount, as half of the space will be used by commercial tenants (at least during days times), or \$300,000.

HERITAGE RESTORATION.

The site includes four old buildings on Carleton Street that are part of a significant heritage streetscape. The development plan does not propose removing these buildings, but rather fully restoring them to their original condition. To achieve this goal, Dexel Developments is working with noted heritage expert and developer Hal Forbes (Forbes Restoration). The plan is to strip the exterior of these buildings down to their original clapboards, and to then rebuild/restore the windows, doors, shingles, frieze boards, corbels, etc. to their original condition. Dexel Developments estimates that the four structures have 11,250 SF of exterior façade (1,045 Sq. Meters) and that the cost of restoration is \$105 per SF (\$1,130 per Sq. M) for a total cost of \$1,181,250. As approximately 50% of this work would have been done as regular renovation regardless of the density of the proposed development, the developer is only claiming 50% of the value of this work (\$590,625) as a public benefit.

9. CONTRIBUTION TO UNDERGROUND WIRING.

After Hurricane Juan, there was a large amount of damage to the power lines throughout the city. This damage included the cost to replace power poles and power lines, as well as the productivity losses associated with going without power for 2 to 3 days. As of a result of Hurricane Juan, the Municipality has indicated that it is interested in seeing more power lines buried beneath the street. For a well-known retail street such as Spring Garden Road, the undergrounding of power lines has an additional benefit as it improves the aesthetics of the street, which benefits both residents and visitors to the area.

The cost of undergrounding the power infrastructure around the property has been estimated to be worth approximately \$1,425 per foot (\$4,673 per linear meter) or \$1,000,000. Although Dexel Developments is not looking to pay for the full cost of this amenity, they would commit to funding one third (1/3) of this cost (\$333,000) with Nova Scotia Power paying for the wiring and HRM picking up the rest of the cost.

SUMMARY OF DEVELOPER CONTRIBUTIONS.

The following table provides a summary of the proposed contributions by the developer, which total \$5.766 million.

Prep	SUMMARY OF PUBLIC AMENITIES - SPRING GARDEN WEST Prepared by Cantwell & Company Consulting Ltd August 2016								
Item		Quantity	Units		Rate	Total Cost	Public Amenity Component	,	Amenity Value
1	Affordable Housing	16	units		\$96,842	\$ 1,549,474	100%	\$	1,549,474
2	Affordable Office Space	348	SM		\$1,078	\$ 375,000	100%	\$	375,000
3	Public Atrium & Living Room	409	SM	\$	5,379	\$ 2,200,000	50%	\$	1,100,000
4	Free Indoor Public Bike Parking	37	SM	\$	2,703	\$ 100,000	100%	\$	100,000
5	Public Park Improvements	1,171	SM	\$	538	\$ 630,250	100%	\$	630,250
6	Streetscape Improvements	1,307	SM	\$	603	\$ 787,808	100%	\$	787,808
7	Creation of Public Parking	11,148	SM	\$	54	\$ 600,000	50%	\$	300,000
8	Heritage Façade Restoration	1,045	SM	\$	1,130	\$ 1,181,250	50%	\$	590,625
9	Contribution to Underground Power	214	Lin M	\$	4,673	\$ 1,000,000	33%	\$	333,000
	TOTAL CONTRIBUTIONS							\$!	5,766,157

As the proposed public benefits exceed the value of the incremental land value provided to the developer, this should be considered a good deal for the municipality and the general public.

If you have any further questions, please do not hesitate to contact me at 902-497-7338,

Sincerely, Cantwell & Company Original Signed

Ross A. Cantwell, M.Sc., President

WE LIVE LIFE WELL?

BUILDING SPRING GARDEN WEST

SPRING GARDEN ROAD / ROBIE TO CARLTON STREET





ACCESSIBILITY FOR EVERYONE

Easy throughfare for traffic with enough room for everyone - vehicles, pedestrians, cyclists as well as following the Rick Hansen Accessibility Standards.



COMMUNITY MEETING SPACE

The public atrium located on the corner of Robie St. & Spring Garden Rd., will offer a unique meeting space as well as a public performance space.



RESTAURANTS & BUSINESSES

Local shops, services and restaurants to explore and enjoy. Retail sizes will vary allowing, small local business to set up shop. Office spaces will be designed to support medical practices, down the street from Nova Scotia's largest hospital

SGW BENEFITS

BUILDING BENEFITS

- · Green energy efficient building
- Public Atrium at the corner of Robie St. & Spring Garden Rd.
- 4th floor public living room overlooking the corner of Spring Garden Rd. and Robie St.
- Public performance space
- 24/7 well-lit sidewalk with security
- 3 fully restored heritage properties on Carlton St.
- 24/7 underground, heated public parking
- Underground, heated bike parking
- 5% affordable housing
- 1% social housing
- 5% affordable office space for NGOs
- · Off street loading & garbage area

PUBLIC REALM BENEFITS

- Revitalization of Balcom Park
- Improved streetscape with wider sidewalk and 643 ft of linear park
- Heated sidewalk to melt the snow and ice
- Undergrounding of power lines with the assistance of the HRM & NS Power















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Attachment B Compliance with HRM's Key Planning Principles

Transition:

The proposed building design recognizes surrounding development, especially adjacent lowscale residential buildings, through built form and landscape transitions. This can include setting proposed buildings back from property lines and stepping down the height of proposed buildings as they approach low-rise buildings. Landscaping can be used as a buffer between properties and to soften building elements.

The site is centrally located within an area that already accommodates numerous residential, commercial, and institutional towers, while being at the intersection of two wide principal streets. The size of the site and the nature of the streets allows massing to be pulled away from Carlton Street to provide two well-spaced, slender towers on a shared podium, while also allowing at grade landscaped open space, streetwalls that are appropriate for the road widths, and separation from and transition to a heritage streetscape, with lot coverage of only 76%. As well, the design and massing allow for another major development on another portion of the block.

Integral to the proposal is the full restoration of 4 registered heritage properties on Carlton Street, and the provision of landscaped open space that is dedicated to those buildings. In addition there are substantial at grade setbacks from these low rise buildings, which are to be enhanced through the provision of privacy fences and tree plantings. Adjacent to 1494 Carlton Street at the corner of Spring Garden the project is limited to two floors to provide a transition to the two-storey character of Carlton Street, and floors 3-6 are setback a minimum of 11.5 m from the rear property line of 1494 Carlton. There is an at-grade setback of 11.5 m from the rear property lines of the other 3 heritage properties. The tall tower is setback 20 m from the rear lot line of the heritage properties, and a full 36.5 m from the sidewalk on Carlton Street . Together, these measures provide an appropriate transition for the project to the heritage buildings and low rise character of Carlton Street.

A low-rise four storey streetwall is provided on both Spring Garden Road and Robie Street to transition into and maintain a comfortable pedestrian realm. This low rise section of the building is extended along internal lot lines adjacent to the abutting College Street land assembly to match the proposed height of that project. Mid-rise floors 5-8 are set back 3.5 m from the edge of the Spring Garden streetwall and 4.5 m from that on Robie, and the height between the two towers has been reduced to 6 floors from the previous 8 in order to reduce the massing and shadows along Spring Garden Road. Tower floors are further set back, while the towers are extremely slender with very small floorplates that help enable appropriate transitions both within and without the site. The taller square tower has a maximum floorplate of 756 sq m, while the corner tower is only 421 sq m per floor. Overall the combined tower footprints represent only 28% lot coverage, which enables excellent transitions to the streets and abutting properties through the provision of at-grade setbacks of low rise floors and through setbacks of mid rise floors. An internal service courtyard and ground floor for the service area is provided.

Pedestrian Oriented:

Pedestrian-oriented means that the proposed building and site design prioritizes the needs and comfort of

The development site with frontage on 3 streets (Carlton, Spring Garden, Robie) is already a busy pedestrian precinct, and the proposal builds on and enhances this character. It maintains and improves the heritage streetscape on Carlton by fully restoring 4 heritage buildings and providing attractive, quality rear yard landscaped space for these buildings where none now exists. The unattractive gravel parking lot that can be seen behind the heritage buildings from the







pedestrians. The intent is to create safe, comfortable, and more enjoyable environments for people of all ages and abilities. Pedestrian oriented design elements include buildings that are oriented to the street, with safe and inviting pedestrian connections through larger sites. Streetwalls should respond to the rhythm and variety of walking speed. Buildings should provide frequent and prominent entrances, transparent windows, weather protection using awnings and recesses, and be designed to mitigate the impact of required parking accesses and utility features. sidewalk will be replaced by landscaping and appropriately-designed visual barriers along the new property lines.

An appropriately scaled streetwall of 4 storeys is provided along most of the Spring Garden Road and Robie Street frontages, stepping down near property boundaries. The 4 storey height is comfortable for the pedestrian realm given the width of the streets, while mid-rise and tower floors are stepped back further from the streetwall in order to maintain a comfortable environment for pedestrians on the sidewalks and to maximize sunlight penetration. At the corner of Spring Garden/Robie there will be an easily accessible and highly visible public atrium that blends indoor and outdoor pedestrian environments, helping to create a sense of connection with Balcom Park across the street.

The block faces are highly permeable as the building provides numerous, well defined entry points to the proposed commercial spaces, public spaces, and lobby areas. Smaller commercial units front on the sidewalk, while larger units are internal to the block to maintain great visual interest. The streetwall provides variations in massing and materials, with a rhythm of recesses while there is continuous landscaping in the 0.75 minimum setback along the building front and along the sidewalk. This will encourage spill out activity from retailers and service and continually invite pedestrians to pause. There is a very high proportion of windows at grade to allow easy visibility into the internal spaces, and awnings will be used to provide visual interest and protection. Landscaping will be integrated into the building design and provided along both street frontages.

There is only one driveway entrance along a principal street (on Spring Garden), for service and delivery vehicles, which will reduce pedestrian/vehicle conflicts while helping keep delivery vehicles and goods off the streets and sidewalks. This driveway replaces three that currently exist on the frontage and will be integrated into the building design and landscaped on each side, while loading bay doors will not be visible from the sidewalks.

Human Scale:

Human-scale means the impression of a building when seen in relation to its surroundings, or the size and proportion of parts of a building or its details in relation to its surroundings that relates in a positive way to the visual and physical experience of a pedestrian. Moderately sized buildings, as well as taller buildings with lower scale podiums and architectural detailing, work together with narrow streets, plazas and small

The low four storey podium with its low lot coverage of 76%, careful design and incorporation of detailed design elements, recesses, landscaping and numerous entrances ensures that the SGW project creates a comfortable and attractive human scaled environment.

The entire streetwall faces are designed to relate to the widened sidewalk and the heavy foot traffic that passes by. Narrow store frontages and landscape planters ensure constant change in the commercial environment.

Overhead wires along the abutting sides of both Robie Street and Spring Garden Road will be relocated underground, providing a much more appealing and comfortable streetscape for those adjacent to the site and those approaching. Landscaping along the top of much of the streetwalls and on upper floors helps define and soften the pedestrian realm and add additional visual interest in all seasons.





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pocket parks to create an intimate environment and comfortable experience. Human scale design makes urban environments more interesting, encourages exploration and draws more people to local shops and services

The substantial and varied setbacks of the mid-rise and tower upper floors ensures that the 4 storey streetwall is clearly defined and highly legible as part of a comfortable pedestrian realm.

The towers have very small floorplates which ensures that the low rise portions of the building are most prominent visually. These very slender towers with their small footprints and separation thus do not overwhelm the sidewalk pedestrian experience, and allow views of the sky and substantial sunlight penetration to the streets. The cladding of the towers will be lighter in colour than the podium to further emphasise the project at ground level.

Building Design:

Design means the overall architectural composition of a building and its orientation on the site. Proposed buildings should provide visual interest from all vantage points, and especially from the street. The building's façade should be articulated vertically and horizontally using a combination of windows, changes to materials and material treatments and other architectural facade elements. Coordinated building elements (like lighting and signage) and site elements (like landscaping) contribute to the overall quality of the design

The design of the project fully respects best practice urban design principles. It includes a well-defined pedestrian-oriented base with varied textures, small store frontages, a rhythm of bays and recesses, well-defined entrances, and extensive landscaping that taken altogether provide excellent visual interest to passersby and create a project that blends into and complements the precinct.

The use of traditional masonry and extensive glazing on the streetwall provides a strong base, with lighter materials and more curtain wall and ceramic panels on upper floors.

Substantial setbacks of mid-rise and tower floors above the streetwall, accented by landscaping on top of the 4 storey podium, and at mid-rise and tower levels, provide a clear transition to the mid-rise floors while the slender towers with their small floor plates and accent landscaping are graceful and provide elegant rooflines.

Signage bands, awnings, landscaping, and lighting of sidewalk will be consistent and coordinated along both primary street frontages while maintaining a character of smaller individual storefronts with clear accesses to public spaces.

Context Sensitive:

The proposed building's design respects the character of the surrounding neighbourhood. The scale, form, and materials used respond to the architectural character of the neighbourhood. Next to heritage buildings or streetscapes, the proposed building complements and enhances the heritage features.

The development responds to each of the three streets on which it has frontage, strengthening the character of each street and helping link neighbouring blocks within this designated Centre:

On historic Carlton Street the project fully restores 4 registered heritage properties and removes an unsightly parking lot that extends to their rear walls and instead provides landscaped rear yard amenity space and strong definition of the rear property lines. Massing of the project is pulled away from the historic streetscape and gathered up into slender towers that will minimize the profile of the new building as perceived from Carlton Street. A lot coverage ratio of only 76% indicates how the project's footprint is minimized, allowing the separation from heritage properties, adjacent development, and for additional open space along Spring Garden Road and Robie Street.

Spring Garden Road is the focus of existing high rise development to the north and east. This project asserts a much stronger main street character appropriate



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for the corridor through the provision of wider sidewalks, numerous small retail storefronts in a four storey podium, fine grained design and materials, and enhanced landscaping. The slender towers atop the sidewalk-oriented podium are in appropriate contrast to the wider slab character and large setbacks of older high rises, setting an appropriate tone for future renovations or redevelopments of other tower sites

Robie Street presents a range of existing land uses and scale of development, while its wide boulevard enables a strong streetwall presence. The four storey streetwall wraps around the corner from Spring Garden, with a public atrium provided along most of the Robie frontage to help define the transition from the commercial character of Spring Garden to the more residential Robie. A very narrow tower of 14.5 m width along Robie Street with edge landscaping rises above the atrium and defines the western edge of the Centre, which with the width of Robie Street provides an appropriate transition to the park and church on the west side of the street.

Consideration of Proposal's Design Relative to Adjacent College Street Development:

The Spring Garden West project comprises over 1/3 of the block, while to the south a similar land assembly has been undertaken for a development of similar scale. Taken together the projects capitalize on this important opportunity for densification while also each respecting the heritage character of Carlton Street that also extends to Spring Garden Road and College Street.

The SGW project and adjacent development each provide an appropriate four storey streetwall along Robie Street. A recessed residential lobby entrance is located at the south end of the SGW project on Robie Street, which will break up the shared streetwall and provide further visual entrance in a mid-block location. As the applications progress, mutual attention needs to be paid to detailed design to ensure that the projects are fully complementary within the pedestrian realm and where they met at street level, and to determine appropriate, complementary design of the reconstructed sidewalk and landscaping along the entire Robie Street block frontage.

Above the streetwall, the mid-rise levels (floor 5 to 8) of the SGW project are set back 5.5 m (18 feet) from the shared property line to provide an adequate separation distance along the shared lot line. The proposed SGW towers are each set back 12.5 m from the shared property line, to allow the desired degree of separation from the two towers proposed there.

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Attachment C **Compliance With Regional Plan Heritage Policy**

Policy CH-16 For lands abutting federally, provincially or municipally registered heritage properties, HRM shall, when reviewing applications for development agreements, rezonings and amendments pursuant to secondary planning strategies, or when reviewing the provision of utilities for said lands, consider a range of design solutions and architectural expressions that are compatible with the abutting federally, provincially or municipally registered heritage properties by considering the following:

(a) the careful use of materials, colour, proportion, and the rhythm established by surface and structural elements should reinforce those same aspects of the existing buildings;

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The new development does not have a street presence on Carlton Street, and architectural matters are considered in relation to the sidewall of 1494 Carlton at the corner of Spring Garden and its relationship to the Spring Garden Road streetwall of the building. To reinforce the visual characteristics of the restored existing buildings, the SGW project incorporates several design measures to ensure their design and character are highlighted and respected:

- Along the full Spring Garden Road frontage where the 4 storey tall streetwall of the new building transitions down to 1494 Carlton, brick will be used to complement the wood siding of the heritage building and reinforce the heritage elements of that building and provide a transition from the rest of the Spring Garden Road frontage
- Traditional narrow storefront proportions along a series of bays and projections with appropriately proportioned windows, a variety of colours and emphasis on brick facades will be used to break up the full Spring Garden streetwall and reinforce the fine grained character that exists around the corner on Carlton Street
- The side wall of the new building will be a 2 storey high green wall next to 1494 that provides a soft backdrop to the building when viewed from the streets.
- Behind the four Carlton Street heritage buildings, the new building will be substantially setback which will allow the heritage buildings to remain highly prominent in the streetscape. Extensive landscaping will be provided behind the buildings where none currently exists and along the edge of the underground parking garage

(b) ensuring that new development is visually compatible with yet distinguishable from the abutting registered heritage property. To accomplish this, an appropriate balance must be struck between mere imitation of the abutting building and pointed contrast, thus complementing the abutting registered heritage property in a manner that respects its heritage value;

The setbacks of the SGW project behind Carlton Street, extensive landscaping, and the orientation of the massing toward Spring Garden Road provide an uncluttered backdrop to the historic Carlton streetscape and ensure visual compatibility from that perspective.

Where the heritage building of 1494 Carlton presents its sidewall to Spring Garden Road adjacent to the new building, visual compatibility is maintained as the streetwall of the SGW project provides a transition in scale and materials from the low rise, wood-frame, 2-storey character of Carlton to the modern redevelopment that will extend along the rest of the block to Robie Street. The materials suggested for use are brick masonry facing the street and wrapping around behind Carlton Street, while a green wall will face the heritage property. The new building will be clearly new, but will reflect the roofline and cornice line of the existing heritage building. The brick provides a complementary contrast



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	to the wood siding of the heritage building along the Spring Garden Road frontage, while the green wall provides a gently contrasting backdrop. The green wall extends the full rear width of 1494 Carlton.
(c) ensuring that new developments respect the building scale, massing, proportions, profile and building character of abutting federally, provincially or municipally registered heritage structures by ensuring that they:	The Spring Garden West project respects the heritage resources on Carlton Street by not intruding into the historic streetscape. The low lot coverage of 76% allows for extensive setbacks, at-grade landscaping and orientation of mass in slender towers along Spring Garden Road and Robie Street away from Carlton Street.
(i) incorporate fine-scaled architectural detailing and human-scaled building elements.	The new building will not abut the rear of 3 of the heritage buildings that front onto Carlton Street, but will be setback from 11.5 m behind 1478/1480/1484 Carlton Street. Behind all four heritage buildings human-scaled landscape elements will be provided that respect the character of the buildings and reflect the green nature of Carlton Street. Along Spring Garden Road, the four storey streetwall transitions down to two storeys adjacent to 1494 Carlton Street, and will be visually broken into small traditionally-oriented units clad with a variety of fine-scaled brick, ceramic and metal panels and accented by awnings. Both ground and upper level windows along the streetwall will be vertically proportioned to reflect the proportions of the heritage buildings. The design of the two storey section of the streetwall adjacent to 1494 Carlton appropriately references the restored roof and cornice lines of that heritage building.
	Retail space along Spring Garden Road will be reserved and designed at a fine scale for smaller shops to retain the existing human scaled character, while space for large stores will be provided internally. Planters will be provided along the front of much of the façade and in front of retail units, while sidewalk planters will be located closer to the street. Numerous building entrances break up the façade and provide well defined entry points. A strong cornice line with landscaping is established to define the edge of the pedestrian realm.
(ii) reinforce the structural rhythm (i.e., expression of floor lines, structural bays, etc.) of abutting federally, provincially or municipally registered heritage properties; and	The proposed buildings abut only one of the four heritage buildings, at the corner of Spring Garden and Carlton. 1494 Carlton presents its two storey side street wall to Spring Garden Road, where the development will provide an appropriate transition with a two storey streetwall between the heritage building and upper floors. The transition will reference the height and cornice lines established by the heritage building. The rhythm of the other 3 buildings along Carlton Street is reinforced through provision of substantial setbacks at grade of 11.5 m and through use of landscaping which provides a soft backdrop and maintains the rhythm of the heritage buildings in the larger streetscape. The building frontage on Spring Garden is broken up through bays and recesses in the streetwall and is designed with emphasis on traditional materials and proportions.







(iii) any additional building height proposed above the pedestrian realm mitigate its impact upon the pedestrian realm and abutting registered heritage properties by incorporating design solutions, such as stepbacks from the street wall and abutting registered heritage properties, modulation of building massing, and other methods of massing articulation using horizontal or vertical recesses or projections, datum lines, and changes in material, texture or colour to help reduce its apparent scale;

The pedestrian realm as established by existing buildings on both Carlton Street and Spring Garden Road is two stories, while a new streetwall of 4 storeys will be provided along Spring Garden. This streetwall will be set back 0.75 m from the Spring Garden property line to allow landscaping between the sidewalk and the new building. Along Spring Garden Road next to 1494 Carlton, the building will start at 2 floors in height directly adjacent to the heritage building, while floors 3 to 6 will be setback 11.5 m from the rear lot line of 1494 Carlton. The 2 storey section references and emphasizes the roof and cornice lines of the heritage building and carries them along the street.

The massing of the primary tower above the pedestrian realm is designed to be very narrow at only 27.5 m wide and is generously set back 20 m from the rear lot lines of 1480, 1484, and 1496 Carlton, and over 36.6 m from the Carlton Street sidewalk. Directly behind 1478 Carlton, the height does not exceed 8 storeys. As the proposed building is set back at grade behind 1478-1484 Carlton and will not extend to or front on Carlton Street, there is no mitigation of additional height needed relative to that street other than the provision of appropriate landscaping and walls/fences behind the heritage buildings.

Above the pedestrian realm on Spring Garden, mid-rise and tower floors are well setback from the building base on the street frontages, as per best practice. Variations in building massing and provision of varied stepbacks in a ravelin form substantially reduce the apparent effect of extra floors, as does the use of lighter tones above the pedestrian realm. The use of landscaping at grade, on top of the streetwall and on higher floors further mitigates any impacts. Utility wires will be undergrounded on all three streets along the development frontage and will help enhance the pedestrian realm. Finally, the tower profiles and footprints are very narrow which minimizes the impact of the height from Carlton Street – the width of the primary tower is only 63 percent of the total property width.

(d) the siting of new developments such that their footprints respect the existing development pattern by:

The footprint of the Spring Garden West project respects the existing development pattern as follows:

(i) physically orienting new structures to the street in a similar fashion to existing federally, provincially or municipally registered heritage structures to preserve a consistent street wall;

The building at 1494 Carlton is built to the property line adjacent to Spring Garden Road. Along Spring Garden Road, the project will be set back 0.75 m to maintain visual prominence of the heritage building in the streetscape.

(ii) respecting the existing front and side yard setbacks of the street or heritage conservation district including permitting exceptions to the front yard requirements of the applicable land use by-laws where existing front yard requirements would

The heritage buildings at 1478, 1480 and 1484 Carlton Street have varied setbacks, averaging approximately 1.5 m from the streetline, and have minimal sideyards. The proposal does not impact the yard pattern along Carlton Street as there will be no portion of the project extending toward the Carlton Street frontage - the project is fully oriented to Spring Garden Road and Robie Street. The building at 1494 Carlton is built to the street lines at the corner. The existing driveway access to mid-block surface parking between 1484 and 1494 Carlton will continue



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detract from the heritage values of the streetscape; (e) not unreasonably creating shadowing effects on public spaces and heritage resources;	to be used but will instead lead to fully underground parking. The ramp leading down from Carlton Street is designed to partially expose and preserve the stone and brick foundations while maintaining small landscaped sideyards. Along Spring Garden Road, the project will be set back from the streetline by .75 m to respect 1494 Carlton and to provide additional sidewalk width. There will be limited impact from shadows. The greatest impacts come from wide building faces which result in heavy, slow moving shadows. Therefore, the greatest shadow impact will be from the 4 storey podium which extends along most of the Robie Street and Spring Garden Road frontages.
	The two slender towers will cast much longer shadows, but these will be smaller due to the very narrow profile of the buildings. The shadows will accordingly be fast moving, meaning that Balcom Park at the corner of Robie and Coburg will not be shadowed unreasonably. The impact of the tower shadows on sidewalks will be less than from shorter, wider buildings as the shadows will move quickly, allowing substantial sunlight penetration to the streets. There will be late day shadows from the towers that fall across the heritage buildings and the Carlton Street streetscape but as the towers are narrow the shadowing period will be of shorter duration than from lower, wider buildings. Shadow impacts from the low/mid rise levels on the heritage properties and on Carlton Street will be negligible.
(f) complementing historic fabric and open space qualities of the existing streetscape;	The building setbacks respect and complement the existing streetscape, through an extensive setback of 11.5 m from 1478-1484 Carlton, provision of landscaped amenity areas in rear yard of heritage buildings, and solid decorative fence/wall along property line with tree plantings. Landscaping will be provided along the sides of the parking access ramp to be located between 1484 and 1494 Carlton Street, and at ground level above the parking garage doors.
	Along Spring Garden Road adjacent to 1494 Carlton, the new building provides an appropriate transition in terms of height and design between old and new. This is achieved through a two storey transitional section between the restored two storey heritage building and higher floors of the new development. This transitional section appropriately references the roof and cornice lines of the heritage building.
	Utility wires will be fully undergrounded along the Spring Garden and Robie Street frontages. Service wires to the 4 Carlton Street properties will be removed, as these buildings will be serviced from the rear via underground conduits.
	Together, these measures will contribute to the established street character which is well defined on Carlton Street and help maintain heritage character around the corner onto Spring Garden Road.
(g) minimizing the loss of landscaped open space;	There is no landscaped space being lost. A private gravel parking lot that extends to the rear walls of the existing heritage properties is being



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	removed. New private landscaped open space will be provided behind the registered heritage buildings at 1478/1480/1484 Carlton Street. The new open space will include soft and hard landscaping and a fence to provide a clearly defined edge for the rear of the heritage properties. New landscaped open space will be created between the Robie and Spring Garden sidewalks and the new building, and on upper floors.
(h) ensuring that parking facilities (surface lots, residential garages, stand-alone parking and parking components as part of larger developments) are compatible with abutting federally, provincially or municipally registered heritage structures;	All parking is contained below grade within the proposed new building, and therefore screened from view. There is a service driveway off Spring Garden Road that provides access to 2 loading docks in the rear of the building. The paved service area allows for setbacks between existing and new buildings and will be well screened from view of the heritage properties on Carlton Street through the use of fencing and extensive landscaping.
(i) placing utility equipment and devices such as metering equipment, transformer boxes, power lines, and conduit equipment boxes in locations which do not detract from the visual building character or	Such equipment will be enclosed and screened either within the project or the rear service yard area. Any equipment within the rear yard will be integrated within the landscaping and not visible from public areas or the heritage properties. Overhead wires to the 4 Carlton Street properties will be removed, as
architectural integrity of the heritage resource;	power and comm services will be provided underground from the rear via the new building.
(j) having the proposal meet the heritage considerations of the appropriate Secondary Planning Strategy, as well as any applicable urban design guidelines; and	The restoration of four registered heritage properties on Carlton Street is an integral part The Spring Garden West project is designed bearing in mind both the Conservation Standards as adopted by Council and the 'Design in Heritage Contexts' chapter of the Downtown Halifax Design Manual. These represent current best practice standards.
(k) any applicable matter as set out in Policy G-14 of this Plan.	This policy addresses site suitability, potential impacts on historic features, area context, servicing and transportation, and overall massing and design. These are standard matters of consideration under any development agreement application and which are expected to be reflected in new land use policy that will be adopted for the Spring Garden West project. It is important to note that by designating the site as a Centre, Centre Plan raises no concerns about the principle of a large scale development on the site.
	The footprint and massing of the project fully respects and enhances the streetscape and buildings of historic Carlton Street by orienting the building toward principal streets and minimizing massing as perceived from Carlton Street.