



NEWFOUNDLAND & LABRADOR
HISTORIC TRUST
— est 1966 —

November 27th, 2019

Mayor Danny Breen
Deputy Mayor Sheilagh O'Leary
Councillors Burton, Collins, Froude, Hanlon, Hickman, Jamieson, Korab, Lane, and Stapleton
City of St. John's
P.O. Box 908
St. John's, NL A1C 5M2

Re: Parish Lane Residences, 66-68 Queen's Road

Dear Mayor Breen, Deputy Mayor O'Leary, and Councillors Burton, Collins, Froude, Hanlon, Hickman, Jamieson, Korab, Lane, and Stapleton:

We are writing to express our concern with the proposed rezoning of 66-68 Queen's Road and the design of the Parish Lane Residences presented in the LUAR of 6 November 2019.

We would, first of all, like to clarify that the Newfoundland and Labrador Historic Trust supports infill development. Building density is essential to increasing the number of people living in, working in, and supporting our historic downtown. We would also like to commend the proponent for their intention to conserve the existing residence and historic masonry entrance to the Anglican Cathedral Parish Hall. So often proposals start from clean slates, i.e. demolition.

While generally supportive of infill and retention of surviving character-defining elements, we have several concerns with this particular proposal from a conservation perspective. Namely:

- Deconstructing the masonry entrance will likely result in significant loss of material and storing it until Phase 3, which may never be built, will add to both risk and cost. Logistically the plan for the historic entrance is unlikely to proceed as proposed.
- From a design perspective the masonry entrance is not integrated into the proposed building. Its door will be non-functional or enter into a parking garage, it is illustrated as distinct from the slope-roofed residences, and close to a third of the surviving façade will be displaced to allow access to a surface parking lot. Relegating historic fabric to mere decoration increases the likelihood that retention will be cut in the name of cost-savings. The proponent has missed an opportunity to make this the gateway to the project, instead moving the door to the west.
- The ground level of the Queen's Road façade, aside from the existing house, will be the blank exterior of a parking garage. Indeed if Phase 3 is not constructed Queen's Road and the National Historic District may get only parking at the street.

The Newfoundland and Labrador Historic Trust is dedicated to the preservation of the province's buildings and landscapes and their importance to communities.

PO Box 2403, St. John's, Newfoundland and Labrador, Canada, A1C 6E7
coordinator@historictrust.ca
www.historictrust.ca

- The proposed surface parking lot is detrimental to the historic character of downtown. Surface lots represent unusable open space, limit density, and encourage car use. They are often symbols of historic failures, popping up where buildings have been lost. Comprehensive new developments such as this must incorporate parking within the structure and should strive to minimize vehicular traffic in general.
- The height of the Phase 2 structure, which appears to top Harvey Road by more than five stories at its peak, obscures The Rooms from many angles and will likely have unstudied impacts on other views including those of and from the Basilica. A modest reduction in height would avoid the worst of these impacts.

Development need not be all or nothing and we encourage the proponent to revise their current design based on this and other feedback. With respect to the issues above we have three recommendations:

- 1) revisit the historic masonry entrance as an asset and focal point, securing it in situ and integrating it into the design of the Phase 3 structure,
- 2) reconfigure both structures to eliminate surface parking and bring usable residential or commercial space down to the ground floor of the Queen's Road façade, and
- 3) reduce the maximum height of the development by as little as one storey, as part of the above reconfiguration, to preserve views to and from some of our most valued institutions.

We hope you will see this decision as more than a “yes” or “no” and work with the proponent to enable densification of the site while better reflecting the wishes of the community.

Sincerely,

Board of Directors
Newfoundland and Labrador Historic Trust

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