July 23, 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: 9 Buchanan Street, 426 and 430 Water Street

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

On behalf of the board and members of the Newfoundland and Labrador Historic Trust, we write to express concern regarding the proposed development at 9 Buchanan Street, 426 and 430 Water Street. Our concerns relate not only to the proposed design itself but also to the development review process that has been followed to this point.

The proposed design sacrifices even more of our downtown to large-scale blocks, blank walls, and fake-windowed parking garages. These do not reflect the traditional character of downtown St. John's, which has historically been characterized by human-scale buildings; irregular, walkable blocks; and a variety of active street-level uses that provide "eyes on the street" and promote social and commercial vibrancy. As noted in the Envision St. John's Draft Municipal Plan (section 6.1.4), development should "Ensure that ground and lower levels of buildings contribute positively to the public realm and streetscape, and are designed at a pedestrian scale."

Perhaps most significantly, we have concerns about the process through which the development has already been reviewed. This proposal represents another instance in which Council has disregarded the recommendations of the Built Heritage Experts Panel. We urge Council to be guided by the Panel's expertise.

The City appears to have met with project proponents for months before aspects of the proposal were made public, resulting in the demolition of the John Howard Society building – with a construction date of circa 1850, one of downtown's oldest structures – and the preemptive sale of public lane and air rights to the developer. Neither of these substantial decisions, ones that significantly and irrevocably altered the fabric of St. John's, was made with input from the public.

Sincerely,

Board of Directors Newfoundland and Labrador Historic Trust

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