



Feb 21, 2025

Re: Mayflower Factory Heritage Development Application

Dear Heritage Planners and Advisory Committee Members;

To contextualize this submission I draw your attention to the recent [World Economic Forum \(WEF\)'s Global Risks Report \(Feb 5, 2025\)](#). It identifies the majority of critical long-term risks facing the world as environmental. Based on a survey of 900 experts, the coming 10 years will be reshaped by: #1 extreme weather events; #2 biodiversity loss and ecosystem collapse; #3 critical change to Earth systems; #4 natural resource shortages; #10 pollution.

This is relevant as a planning decision such as the Mayflower Factory Heritage Development Application as it is an actual decision point where HRM can and must negotiate to minimize impact of these risks and harms. Because GHG emissions have to stop, we must stop the emissions. Climate impact must be a key factor in the decisions relating to this application. Demolitions, construction and building is adversely harming our Climate Crisis: Upfront or embodied carbon or energy used to produce materials and products for buildings accounts for about 11% of global greenhouse emissions. Operational Energy is energy used for lighting, heating, cooling buildings and accounts for about 28% of global GHGs.

My report "[Buildings for the Climate Crisis – A Halifax Case Study](#)" looks at preliminary assessments of GHGs associated with the demolition of existing low rise buildings and compares these to mid-rise (9-storeys) and to high-rises (16, 30, 22, 24 storeys) on Halifax's Carlton Block. It is based on researched evidence. It explains why demolition and new construction of a tower such as for the proposed Mayflower Factory building are a bad choice for the climate.

Demolitions unnecessarily replace existing floor area and unnecessarily use materials and the energy to produce, transport and install these. There are better options for density and the climate. I invite you to take a look.

Built Form and Density: My report also uses scientific research to explain that the taller the building, the disproportionately greater the GHGs because of disproportionately greater use of energy intensive products and materials (glass, steel, concrete, aluminum). Towers usually have a larger footprint or land area than smaller in-fill or modification of existing buildings and generally cause more demolition. Here's a [good slide summary of the report from a presentation to HRM](#)

Note the slide from [Decoupling density from tallness in analysing the life cycle greenhouse gas emissions of cities](#), from a team led by Frances Pomponi. It examines four basic urban typologies. <https://www.nature.com/articles/s42949-021-00034-w> with a Life Cycle Emissions and Population Summary. It finds High Density Low Rise (HDLR) has less than half the Life Cycle GHG Emissions (LCGE) per capita of High Density High Rise (HDHR) buildings.

[High-Rise Buildings: Energy and Density](#) by Professor Philip Steadman of UCL sets out existing evidence on density and energy use on built form and density. It describes mathematically how Courtyards are the best, Crosses next, and Towers are only the THIRD best form for density.

[Operational Energy: A study by UCL Energy Institute](#) finds office and residential buildings use more energy per square metre, the taller they are; twice as much for 20 or more storeys when compared to low-rise buildings of 6 storeys or less. Energy efficiency may be very slowly changing but this will not prevent GHGs now nor does not address an overall problem of towers are less flexible for adaptive reuse.

Natural Resources Shortages: As much as 30% of materials in Nova Scotia landfills come from demolitions and construction waste. Each year HRM issues hundreds of demolition permits. *As the shortage of natural and material resources increases can we really continue the habit of sending buildings off to the landfill?*

Very real but ignored is the wastefulness of demolitions and the penalty to communities such as [Nova Scotia's Arlington Heights or other marginalized rural areas where the landfills for the materials are hidden](#). A 2024 HRM staff report

found there are 12,000 vacant lots within HRM. These should be prioritized for building and infilling gentle density and missing middle ahead of any demolitions. These can all be built beginning demolition and disruption of a Heritage Conservation District. My report has many examples of smaller scale infill, add-on to existing buildings. Many cities are successful adding density in 4-6 storeys that compliments existing architectural style. And include affordability.

The Halifax Common: The adjoining neighbourhood of Creighton's Field developed along the Halifax Common. The mixed lowrise buildings respectfully frame and outline the Common. The if the proposed development at 5563 Nora Bernard Street is approved as presented a 150 years relationship will be broken by gentrification, facadism and maximized profit. It will impact traffic and shadow on the Halifax Common, the Citadel as well as the neighbourhood. The development will also intensify reliance on this premier public green space without offering any of its own. Like a parasite, taking but not giving or committed to the good health of the host.

Without looking at the macro scale of inter-relationships of how our established historic neighbours relate to Halifax's green spaces their sense of openness continues to be lost, clogged one building at a time and further detracting from quality of life. This is true also of the cumulative impact of the numerous redevelopments that will follow this precedent setting one.

In your decision, please consider the following:

Social Harm: eviction, displacement, inflation, loss of affordability, gentrification.
Cultural Harm: façadism that destroys a significant historical & cultural site within a Heritage Conservation District.

Environmental Harm to climate: demolition, materials waste, landfill, double impact on upfront carbon, tower as the worst built form choice for embodied / operational carbon /density.

Halifax Common Harm: intensified use of Halifax Common without any new public green space, increased noise, shadow, wind, traffic, loss of open sky & morning sunlight.

FHC supports more housing, specifically more affordable housing. We support change, specifically by building on not destroying what we have. We support

density, specifically at 4-6 storeys to minimize upfront & operational carbon. Climate impact must be a key factor in the decisions relating to this application.

Finally, HRM's planning freely gives away increased zoning height without requirement for protection of, replacement of or any new affordability. The level of rezoning such as we are experiencing in Halifax inflates land values. Towers, the worst form for density and climate, as well HRM's penchant for towers is driving ever higher towers because of the inflated value of the land. If Paris can do otherwise, why can't Halifax?

The application needs work. Please get it right.

Peggy Cameron
Friends of Halifax Common