



**Position Paper for Discussion**  
**PARK PLANNING AND COORDINATION**  
**WITH SURROUNDING LAND USE**

**BLUE MOUNTAIN-BIRCH COVE LAKES**  
**NATIONAL URBAN PARK CANDIDATE**



## TABLE OF CONTENTS

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### TABLE OF CONTENTS

<b>EXECUTIVE SUMMARY.....</b>	<b>3</b>
<b>1.0 INTRODUCTION.....</b>	<b>5</b>
<b>2.0 PARK PLANNING .....</b>	<b>5</b>
2.1 Park Planning .....	6
2.2 Interim Park Infrastructure Development .....	7
2.3 Transitioning through Park Planning and Ultimately to Park Establishment .....	7
<b>3.0 SURROUNDING LAND USE PLANNING AND DEVELOPMENT.....</b>	<b>8</b>
3.1 Brookline Subdivision .....	8
3.2 Annapolis Group Lands .....	9
3.3 Highway 102 West Corridor .....	10
3.4 Stormwater Discharge (from Clayton Park and Bayers Lake Business Park) .....	10
3.5 BANC Group .....	11
3.6 Parkdale Developments.....	12
3.7 Lordly Lands .....	12
3.8 Piercey Investors .....	13
3.9 Ramar Developments Limited.....	13
3.10 Provincial Crown Land .....	14
3.11 Northern Properties .....	14
3.12 Proposed Highway 113 Corridor .....	15
<b>4.0 THE MOST PRESSING PRIORITIES.....</b>	<b>16</b>
4.1 Committing to Making it Happen.....	16
4.2 Park Concept Planning.....	16
4.3 Park Land Securement .....	17
4.4 Coordination with Surrounding Development.....	18
4.5 Annapolis Group Lands .....	18
4.6 Highway 102 West Corridor Lands .....	19
4.7 Land Use Issues and Options – Western Sector .....	19
<b>5.0 SUMMARY .....</b>	<b>21</b>

<b>APPENDICES .....</b>	<b>22</b>
<b>Appendix 1: Area of Park Planning and Surrounding Land Use Coordination Interest .....</b>	<b>22</b>
<b>Appendix II: Conceptual Park Area, BMBCL Regional Park, 2014 Regional Plan.....</b>	<b>22</b>
<b>Appendix III: Conservation Lands, BMBCL Park Area .....</b>	<b>23</b>
<b>Appendix IV: Development Pressure .....</b>	<b>23</b>
<b>Appendix V: Primary Development Pressures .....</b>	<b>24</b>
<b>Appendix VI: BMBCL Partnership Lands Map (May 23, 2023, Staff Report).....</b>	<b>24</b>

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Working Draft

## EXECUTIVE SUMMARY

Halifax's Blue Mountain-Birch Cove Lakes area stands out as an iconic 12,000-acre undeveloped 'island of wilderness', surrounded by the ever-outwardly-expanding development footprint of Halifax's rapidly growing population. As such, the BMBCL area has emerged as a leading candidate for early addition to Canada's new National Urban Park Program ([Appendix I: Area of Primary Park Planning and Surrounding Land Use Coordination Interest](#)).

Primary partners include HRM, Parks Canada, NSECC, NSNT and the Mi'kmaq – reflecting park and conservation-related mandates, corresponding land ownerships and/or reconciliation priorities respecting Indigenous interests and rights.

The BMBCL national urban park candidate requires high-priority attention within the context of provincial and municipal land use policy, planning and related decision-making, specifically with respect to:

- comprehensive and coherent park concept planning to determine the land base needed in support of the establishment of a viable park management unit; and
- coordinated development planning around the perimeter of the proposed park area to ensure compatibility and complementarity of adjoining and surrounding land uses and developments.

### **Thoughtful Park Concept Planning is Essential**

The most essential need is for a coherent park concept plan, to guide park establishment efforts and to serve as a reference point with respect to coordination with surrounding land use and development. Formally launched in HRM's 2006 regional plan (and reaffirmed in the 2014 plan update) as a proposed regional park ([Appendix II: 'Conceptual Park Area'](#)), and now elevated to national urban park candidate status, the BMBCL park initiative has benefitted from land assembly efforts as follows ([Appendix III: Conservation Lands](#)):

- the Province designated overlapping Crown land as wilderness -- 4365 acres (2009 and 2015);
- HRM acquired several peripheral properties – 581 acres (2018, 2019 and 2022);
- NSNT secured additional complementary parcels – 527 acres (2020 and 2021) and continues to investigate further land securement opportunities.

In the absence of a park concept plan and despite national urban park candidacy, competing development pressures continue to advance relentlessly around the proposed park's perimeter ([Appendix IV: Development Pressures](#)).

**The overriding priority must therefore be for essential park concept planning. This said there is an overlapping pressing and immediate need to consolidate the park establishment opportunity by recognizing significance of the BMBCL area as a highly-valued asset, by proactively securing the park land base needed for effective park establishment, and by responsibly managing existing secured lands in response to existing use patterns and providing corresponding basic facility requirements.**

**Park planning requirements include:**

- commitment of the partners to proceeding with park concept planning, on a coordinated and fully-integrated basis;
- engagement of stakeholders, including the Friends of BMBCL, and the public;
- inventory, mapping and assessment of natural and historic features and values;
- synthesis of inventory information to delineate priority areas for, respectively, environmental protection, recreational use and park facility development;
- identification of ecological corridors within and beyond the park area, and of future park user access opportunities (or options);
- recommendation of park boundary (or options) and lands of corresponding acquisition priority;
- determination of appropriate park governance model (or options); and
- proposal of implementation phasing and estimated budgetary needs.

**Coordination of Park Planning and Surrounding Land Use Planning and Development**

*It is critically important that land use and development decisions for surrounding lands be coordinated to ensure compatibility and complementarity with national urban park establishment efforts. A high standard of coordination clearly is needed around the entire park perimeter; however, areas of particular concern and corresponding challenge include the Annapolis lands, the Highway 102 West Corridor area (Stevens Group) and the Maple Lake-Coxs Lake area (and adjoining Haliburton Hills and Highland Park subdivisions).*

**Summary**

*The most pressing and immediate needs include:*

- recognition of its significance of the park establishment opportunity, acquisition of critical private lands, and responsible interim management;
- coordination of park concept planning on the parts of the primary partners and stakeholders; and
- commitment to complementary land use planning and development on surrounding lands.

*The national urban park candidacy, combined with the accelerated development pressures caused by Halifax's rapid population growth and expansion, calls for a cooperation and coordination to ensure that the proposed BMBCL national urban park is fully and effectively integrated within the developed landscape that will surround. A high-priority one-of-a-kind approach must be adopted, to recognize BMBCL national urban park as a city-building asset that will bring correspondingly unique opportunities and benefits to both HRM and the province overall.*

## 1.0 INTRODUCTION

***Caveat:*** The contents that follow were based, at the time of writing, on limited publicly-available information and occasional meetings/discussions with representatives of the primary partner group. Suggestions/recommendations advanced herein are therefore subject to updating, clarification or correction from time-to-time, as more information becomes available.

***Note:*** Recent developments, namely the May 1, 2023, round table involving partners and stakeholders convened by Parks Canada and the May 23 staff update report to Regional Council, suggest an evolution of approach toward more comprehensive park planning and greater openness/transparency, is encouraging and welcomed.

The Friends of BMBCL Society calls for the early initiation of a coordinated and coherent planning process to guide the successful establishment and protection of the BMBCL area as Halifax's iconic urban wilderness, and for the open and effective engagement of primary stakeholders and the interested public. With the pre-feasibility study (by Stantec) supporting candidacy for early recognition under the country's new National Urban Park Program, it is essential that park concept planning, along with coordination of park establishment objectives with land use and development decisions regarding adjoining and surrounding lands, begin as soon as possible, and in earnest.

The focus must now shift toward moving the BMBCL national urban park candidate from concept to reality, building on the foundation provided by the individual efforts of the partnership group, as below:

- **HRM** (proposal and confirmation of the 'conceptual park area' in the 2006 and 2014 regional plans, selective land acquisition/securement (in 2018, 2019 and 2022), collaboration agreement with Parks Canada (2021) and pre-feasibility study through Stantec (in 2022);
- **NSECC** (designation of overlapping/adjoining Crown land as protected wilderness (2009 and 2015);
- **NSNT** (land securement efforts to date (2020 and 2021), and continuing investigation of additional land securement opportunities and options);
- **Parks Canada** (National Urban Parks Program launch (2021), collaboration agreement with HRM (2021), the pre-feasibility study (2022), and continuing advancement of the national urban park program policy and process); and
- **Mi'kmaq** (represented by Kwilmu'kw Maw-klusuaqn (KMK) and Sipekne'katik First Nation, as partner of the Blue Mountain-Birch Cove Lakes candidate national urban park initiative).

The following sections outline the Friends of BMBCL suggestions and recommendations regarding the initiation of parks planning (Section 2, below), the coordination of park planning with surrounding land use and development decisions (Section 3), and corresponding advocacy priorities for actions going forward (Section 4).

## 2.0 PARK PLANNING

A comprehensive, coordinated and transparent park planning process is essential considering the range of interests and inherent complexities involved – including Parks Canada, the partnering conservation-minded landowners (i.e., HRM, NSECC and NSNT) and the Mi'kmaq, as well as primary stakeholders (including Friends of BMBCL) and the interested public).



## 2.1 Park Planning

Suggested elements of a credible and effective park planning process, extending beyond the Stantec pre-feasibility effort, include (but are not limited to) the following:

- informal **‘round-table’ session(s)** involving primary partners/ stakeholders to ‘flush out’/‘flesh out’ (but not necessarily resolve) the full range of relevant interests, issues, opportunities and challenges. Round table discussions should begin as soon as possible, and
  - involve participation by Parks Canada, the Mi’kmaq, land-owning partners and primary stakeholders (including Friends of BMBCL);
  - benefit from careful organization, including agenda constructed with participant input; and
  - ideally be conducted through an independent and open facilitated approach.
- initiation of **formal park concept planning process**, with careful consideration given to:
  - a non-aligned leadership approach that transcends limiting individual agency interests;
  - effective coordination of primary partners (HRM, Parks Canada, Mi’kmaq, NSECC and NSNT);
  - inclusion of HRM regional/land use planning representation on the park planning team
    - **recognizing national urban park candidacy as a ‘first order’ land use planning priority**
  - active engagement of primary stakeholders, including the Friends of BMBCL, as partners.
- **area of park planning and adjoining land use planning and coordination interest** should consider the entire 12,000-acre (approximate) area that encompasses/surrounds the ‘conceptual park area’:
  - the existing conservation lands already secured by DECC, NSNT and HRN (~5500 acres);
  - surrounding undeveloped (mostly private) lands (~6500 acres); and
  - additional lands extending beyond this ~12,000-acre area where relevant in regard to:
    - ecological landscape connectivity,
    - park access opportunities,
    - watershed protection relative to interior and adjacent park waters, and
    - viewscape/viewplane protection.
- **specific elements of a viable park concept planning process**, should address:
  - park vision, goals and objectives, including
    - recognition of potential for emergence of alternative visions/goals/objectives
  - inventory, analysis, and synthesis of attributes of the park land/water base
  - assessment of potential park user interests, demands and activities
  - proposal of park boundary (including possible variations, with ‘pros’ and ‘cons’ evaluated)
    - to ensure incorporation of valued attributes of the park land/water base
  - proposed park management and development concept(s), including
    - internal park zoning (along a protection-development continuum)
    - recreational facility and service infrastructure

**The Friends of BMBCL emphasize that the highest priority must be placed on the early initiation of park concept planning, with due attention to the coherency of approach amongst the primary partners and effectiveness of engagement of primary stakeholders – all within the context of sound principles and practices regarding park planning and land use coordination.**

## 2.2 Interim Park Infrastructure Development

It is recognized that as public road access and land subdivision and development advances toward the perimeter of the proposed park area, visitor numbers will increase progressively in the absence of planned and timely development of park infrastructure. In order to minimize entrenchment and entrenchment of undesirable use patterns and of associated site impacts, it is appropriate to provide essential facilities and services as an initial or interim development phase (e.g. as in the park area accessed from Brookline Subdivision, and the Parks of West Bedford) – even in the absence of a comprehensive park concept or plan.

Interim facility and services development should comply with similar principles, as would be the case with park concept planning more generally (Section 2.1), including:

- consideration of relationship to overall park vision, even if preliminary and/or evolving;
- consultation with partners, stakeholders and the public regarding interim site and facility design and development standards; and
- coordination within HRM (e.g. to promote compatibility between planning, design and construction activities)

**The Friends of BMBCL support the interim development of access opportunities in areas of increasing unplanned access and use, where needed to control the establishment of undesirable informal patterns of use and consequent site damage, subject to coordination and engagement of partners, stakeholders, and the public.**

## 2.3 Transitioning through Park Planning and Ultimately to Park Establishment

The preceding sub-section demonstrates the challenges embedded in circumstances involving planning future land use, whether for a national urban park or otherwise, for areas where land use and development patterns are already in place or are fast-becoming establish. In the case of the approximately 12,000-acre undeveloped area within which the BMBCL ‘conceptual park area’ was first formally proposed by HRM in 2006, this area has long been popular amongst backcountry outdoor recreational enthusiasts and continues to be highly valued in this regard. However, over the years, before and since 2006, Halifax’s urban footprint has spread outward from historic settlement focussed on Halifax Harbour and Bedford Basin – to the extent that the BMBCL near-urban wilderness is now under pressure from surrounding urban and suburban development and has emerged as a national urban park candidate area that effectively is under siege.

In these circumstances of surging land use and development pressures, although comprehensive park planning is essential and must be initiated as soon as possible, the most urgent and immediate need is to consolidate land base before its margins, and potentially parts of its interior, are further compromised by persistent and accelerating development demands.

These immediate needs, including the following, require attention, even as park planning progresses.



- Recognition, on the parts of the key partners (i.e. HRM, Parks Canada, NSECC, NSNT and the Mi'kmaq), of the uniqueness and significance of the national urban park opportunity as a significant asset that must be maintained intact, without further encroachment, until essential park planning has been completed, the national urban park boundary has been proposed, and corresponding land acquisition is in progress or has been completed.
- Continue to consolidate park lands within a 12,000-acre undeveloped area opportunistically, where existing private landowners may be willing to sell or otherwise commit to the conservation of their respective properties (e.g., through conservation easement).
- Ensure that the ongoing regional plan review and corresponding community planning (i.e., master planning or secondary planning) and subdivision approvals give due recognition to the status of the referenced 12,000-acre area's national urban park candidacy.
- Provide for responsible land management of dedicated park and conservation lands on an interim basis, recognizing that the tradition of informal public use of the proposed park area is continuing (and, in fact, increasing as land development and population growth continue on the park's periphery) and that corresponding site management (e.g. trail maintenance) and basic facilities (e.g. signage) are essential for both the protection of the park environment and for the quality of visitor experiences and their safety. It is emphasized that interim management should focus on maintaining the status quo, as distinct from promotion of the area and/or the enhancement of opportunities that will attract increased use and compound site management issues and problems.

**The Friends of BMBCL encourage a concerted effort on the parts of the relevant partners to responsibly manage existing park and conservation lands in the BMBCL area, to ensure an orderly transition from unmanaged wildland to a quality near urban park opportunity with appropriate facilities and services to accommodate desirable public recreational use levels consistent with objectives intended to achieve environmental protection.**

### 3.0 SURROUNDING LAND USE PLANNING AND DEVELOPMENT

This section advances the current position of the Friends of BMBCL regarding the planning and development of surrounding lands, from the perspective of maintaining the quality and integrity of the park land (and water) base and of future park user experiences.

The following discussion begins with the fast-developing Brookline Subdivision within The Parks at West Bedford community and progresses, clockwise, from site to site around the periphery of the proposed BMBCL area.

#### 3.1 Brookline Subdivision

Brookline Subdivision remains under active development and is contributing to a major population concentration on the northern/northeastern margin of the BMBCL park area. Parks and recreation planning considerations within this area have been largely focussed on typical open space allocations within this rapidly growing community, with relatively little attention to

the community's strategic location at the edge of HRM's most prominent regional park proposal (and now national urban park candidate). The one major exception is in regard to lands in the vicinity of Black Duck Brook, including the dedication of a 2.7-acre parcel within the subdivision (fronting on Broad Street), on which a 60-vehicle parking lot has been developed, the securement of a 42.7-acre parcel across Black Duck Brook (western side), on which an urban trail has been developed) and a 6.8-acre parcel linking Black Duck Brook with Cairnstone Lane (cul de sac). The urban trail begins at the parking lot, crosses the brook via footbridge and returns via additional footbridges that link back to the subdivision, to the southeast (at the end of Cairnstone Lane) and to the northwest (on Broad Street, west of the right-of-way for the proposed Highway 113 corridor). HRM is understood to be soon initiating planning to connect this urban trail with the Hobson Lake area and eventually beyond to provide access into the provincial wilderness area. Otherwise, there is no indication of how this basic infrastructure in the Brookline area may be integrated with the BMBCL national urban park vision overall.

**The Friends of BMBCL support trail extension in this area, as generally described; however, emphasize that doing so should occur via a site planning and design process that, through consultation with relevant partners, stakeholders, and existing and potential local users, gives careful consideration to trail alignment and standards consistent with the previous discussion in Section 2.2 (and ensures integration with the overall park vision and objectives).**

### 3.2 Annapolis Group Lands

The Annapolis Group reportedly owns 965 acres in the BMBCL area, a significant proportion of which overlaps with the proposed 'conceptual park area' as identified in the 2006 and 2014 versions of the Municipality's regional plan. As well, the regional plan zones the Annapolis lands as either urban reserve (UR) or as urban settlement (US). Some 765 acres of these lands currently are at the centre of a lawsuit in which Annapolis is claiming de facto expropriation by HRM. Following a recent decision by the Supreme Court of Canada, it is understood that this legal challenge is expected to be heard by the Nova Scotia Supreme Court in April 2024.

Regardless of the outcome of the lawsuit, the Annapolis lands (in whole or in part) are critical to the realization of the fullest possible potential of BMBCL national urban park as a protected near-urban wilderness. Therefore, from the perspective of the Friends of BMBCL Society, every effort should be made to acquire all or part of these lands, with the landowner being fairly compensated.

**The Friends of BMBCL support the identification of the specific lands to be recommended for acquisition (or of possible alternative acquisition options) through the park planning process (as discussed in Section 2, above), as a basis for negotiation with the landowner and for corresponding final decisions on the part of the Municipality.**

### 3.3 Highway 102 West Corridor

Early in the initiation of the regional plan review process (which was launched with Council's February 2020 approval), the Stevens Group requested the initiation of secondary planning for its portion of the Highway 102 West Corridor lands, including properties registered as Susie Lake Developments (one property, 135 acres) and as Gateway Materials (three properties, 185 acres), altogether amounting to 321 acres. These lands overlap with and lie adjacent to the proposed conceptual park area for the proposed BMBCL regional park (and now National Urban Park candidate).

The interest of the Friends group respecting the Highway 102 West Corridor lands is that:

- the shorelines and adjacent uplands of Washmill, Susies, Quarry and Fox Lakes remain in public ownership;
- plans be included for the establishment of the primary access point (i.e., from Highway 102) for BMBCL National Urban Park;
- due attention be given to maintaining acceptable standards of water quality and quantity regarding inflowing waters to receiving lakes with or adjacent to the park; and
- provisions are included for visual and sound buffering of nearby urban development and associated activities.

In March 2022, the Province became involved directly in municipal development planning by announcing nine special planning areas within HRM where housing development is to be accelerated and by providing funding for HRM to undertake pre-development studies in an additional four areas, which include the Highway 102 West Corridor lands.

The Municipality followed through with the issuance of a RFP in October 2022. The Friends of BMBCL are listed as one of two referenced stakeholders (the other oddly being HRM's own Parks and Recreation Department). Previously and repeatedly, the Friends group have advocated that park planning in the BMBCL area precede pre-development planning for the West Corridor lands. However, with pre-development planning for these lands now underway and with the understanding that park planning for the BMBCL area is soon to be initiated, the hope and expectation at this point is that these two overlapping planning processes will be proceeding in parallel, with the objective of achieving coordination and coherency.

**The Friends of BMBCL welcomes recognition as a key stakeholder in the Highway 102 West Corridor pre-development study and looks forward to engaging as the study progresses – with the objective of ensuring complementarity and compatibility between the 102 West Corridor area and the adjoining national urban park candidate area.**

### 3.4 Stormwater Discharge (from Clayton Park and Bayers Lake Business Park)

Stormwater discharge associated with residential, commercial or infrastructure development results primarily from removing natural vegetation and replacing it with non-permeable

surfaces such as roads, driveways, parking lots and roofs. Impacts include increasing the rates of runoff and erosion, and pollution from numerous contaminants such as sediment, salt, hydrocarbons, and nutrients. A recent water quality study in the Blue Mountain Birch Cove Lakes area demonstrated that the lakes with the poorest water quality are Susies, Quarry, Washmill and Kearney, all in the lower end of the Kearney Run watershed. Therefore, careful stormwater management is particularly important in the watersheds of these lakes to protect their natural and recreational value well into the future.

It is also understood that a portion of the stormwater runoff currently entering directly into Susies Lake has been proposed for diversion into the nearby quarry pit on lands owned by Gateway Materials Limited (Stevens Group), to create an artificial lake as part of the post-operational site rehabilitation process. This proposal potentially has significant implications regarding both water quality and quantity with respect to Susies Lake and downstream waters.

**The Friends of BMBCL recognize the significance of existing and potential impacts of stormwater discharge on water quality and quantity in Susies and Quarry lakes, within the proposed park area and downstream, and will advocate for the highest standards of water management policies and practices in order to protect the natural and recreational value and appeal of the park area over the long term.**

### 3.5 BANC Group

In 2011, HRM sold some 179 acres of municipally-owned land to the BANC Group to enable the expansion of Bayers Lake Business Park. Situated immediately west of Chain Lake Drive, this land, before its sale, had been the only land owned by HRM that overlapped with the BMBCL conceptual park area (as set out initially in the 2006 regional plan) and had been considered by the Municipality's park staff as a primary park access opportunity. In accordance with the subdivision plan for the BANC lands, a 14.36-acre parcel has been conveyed back to HRM as dedicated open space land (effective July 2023). This parcel abuts an isolated parcel of the provincially-designated wilderness (i.e. 140 acres amounting to approximately 3% of the total 4365-acre wilderness designation and incorporating particularly rugged terrain and associated bedrock-dominated shoreline on Susies Lake).

The location of this municipal parkland is at the back of the expanded business park development. It therefore is far from ideal as a quality park access and clearly unsuitable for consideration as a major point of entry to a national urban park. This said, the site is immediately adjacent to a remnant network of informal trails that had become established, pre-BANC, within the immediately adjacent BMBCL Wilderness Area (as well as on the former municipal lands sold to BANC – which, prior to displacement by pre-development site preparation construction activity, had been a favoured mountain biking area widely known as the 'Whopper-Dropper').

Unlike the case with the Brookline Subdivision, where a formal 60-vehicle (approximate) paved parking lot has been established and trail planning and development within the adjoining park

area has been initiated in response to the demand created by rapidly expanding residential population in the immediate area, the BANC subdivision is in an earlier stage of development (primarily retail) and public access to the open space parcel is not yet available (although is anticipated within the upcoming several months to one-year period). At the same time, informal public recreational use of the adjoining wilderness area continues, as has traditionally occurred on an unauthorized basis with access having been gained via private land. Recognizing these circumstances, there is opportunity to address the role of the Bayers Lake open space parcel during the national urban park planning phase (March, 2023-March 2024) as provided for in Parks Canada's contribution agreements with HRM and DECC and can be facilitated by the recently-initiated partner/stakeholder engagement process.

**The Friends of BMBCL recommend that the future role of the HRM open space property at Bayers Lake be carefully assessed and planned deliberately within the context of the upcoming national urban park planning process targeted for completion by March 2024, with possible options to be considered ranging from complementary access (i.e., secondary or tertiary), interim access (i.e., until such time as more favourable alternatives can be established) or possible trade or sale/purchase (i.e., to enable incorporation of alternate lands more beneficial for park management purposes).**

### 3.6 Parkdale Developments

Parkdale currently owns several properties, totalling some 625 acres situated south and west of Susies Lake. These lands will be accessible from the Susie Lake Crescent when extended to connect with Highway 3 and Timberlea Village Parkway (which links with Exit 3 off Highway 103). Preliminary indications communicated in the Fall, 2021 by a representative of Parkdale suggested a willingness to discuss land use and development options of mutual benefit to Parkdale and the proposed park area. However, although Friends formally agreed to participate in such an effort, this did not occur and, more recently, it has been reported publicly that the Parkdale lands are for sale.

**The Friends of BMBCL have been open to participating in a joint planning initiative in this area, with the objective of finding a mutually-beneficial outcome from the perspectives of the park and adjoining development -- either through initial bilateral discussions between Parkdale representatives (or subsequent owners) or, ultimately, in association with a park planning process for the overall BMBCL national urban park candidate area.**

### 3.7 Lordly Lands

The Parkdale properties surround the 135-acre Lordly property which fronts directly on the western shoreline of Susies Lake. The Lordly property, excepting lands of the Stevens and Annapolis groups, is the last remaining private land frontage on Susies and Quarrie lakes.

**The Friends of BMBCL recognize the strategic importance of the Lordly property and support its future use being planned in harmony with the adjoining Parkdale lands (Section 3.6) and, if not, then it being acquired by one of the partners group members for incorporation into the park land base.**

### 3.8 Piercey Investors

The Piercey lands include a number of parcels, totalling approximately 460 acres, generally situated in the area surrounding (and extending westward of) Upper Sheldrake and Maple lakes. Contradictorily within HRM's regional plan (2014), this area is proposed for the alignment of a high-standard connector road running between these two lakes in order to link Sussex Drive in Haliburton Hills Subdivision and Eider Drive, as well as 'core wilderness' within the BMBCL conceptual park area.

A number of the Piercey properties in this area were expropriated by the Province in order to consolidate the alignment of the proposed Highway 113 corridor – with the balance of the Piercey lands being part of a complex land trade proposal designed to: (1) enable the Sussex-Eider connection as a second access/egress option for Haliburton Hills Subdivision, and (2) to provide a consolidated land base to enable further subdivision development by Piercey. Unfortunately, these plans and proposals have been advanced without due consideration regarding the implications for the BMBCL park area (now national urban park candidate) or to ecological connectivity between the Chebucto Peninsula and greater Mainland Nova Scotia.

**The Friends of Blue Mountain recognize that the Piercey lands are part of a complex set of land use issues options, involving multiple (and competing) land uses, various levels of government, private development objectives and community interests, that should be addressed in a broader context (Refer to Section 4.7).**

### 3.9 Ramar Developments Limited

Ramar owns a long narrow (and until-recently) undeveloped 107-acre property that abuts the southwestern boundaries of the provincially designated wilderness and the so-called 'connector lands' acquired by the Nature Trust in 2020. The Ramar property extends almost two kilometers from the southeastern end of Everwood Avenue to the shoreline of Maple Lake. In 2020, Everwood extended approximately 1.25 kilometers along the spine of this property as the initial phase of a linear subdivision to access residential building lots on either side. This development phase is part of a 'legacy subdivision' approval that extends all the way to the shoreline of Maple Lake (approximately an additional .75 kilometers and inclusive of the remaining 49 acres of the former 107-acre lot). This extension would result in significant impacts in regard to the ecological connectivity with the Chebucto Peninsula, the environmental integrity of the



adjoining wilderness area and Nature Trust conservations lands, and the quality of the park visitor experience as it relates to use of the Upper Nine Mile River System and adjoining BMBCL national urban park concept overall.

**The Friends of BMBCL recognize the Ramar lands as part of a complex set of land use interests and issues that can best be considered and addressed through a coordinated approach involving the multiple relevant players, as discussed in Section 3.8, and further detailed in Section 4.7.**

### 3.10 Provincial Crown Land

The Province owns a narrow but highly strategic strip of Crown land, comprised of two parcels (PID 40090367(237 acres) and PID 40748360 (70 acres)) separated an owner unknown property (PID 40821712), which all together extend southeasterly from Hammonds Plains Road to Upper Sheldrake Lake. These properties, in part, are a target of the land trade referenced above (Section 3.8) to enable the Sussex Drive-Eider Drive connection (as well as of the broader land trade to consolidate multiple private parcels for subdivision and development) but have been defended by provincial staff as a natural ecological corridor when the trade proposal was advanced a number of years ago.

In 2022, as part of efforts to accelerate housing supply, the Province identified the 237-acre parcel as potentially being made available for housing development. Both of the adjacent subdivisions (Haliburton Hills and Highland Park) exceed the lot number requirement for provision of a second access/egress and, subject to the successful completion of a fully integrated land use planning approach designed to address the multiple, overlapping and competing land use objectives in the area, the transfer of this property, in whole or in part, for housing development may be supportable from the perspective of the Friends of BMBCL. However, the Friends' ability to offer support would only be possible if the outcome demonstrably would enhance the quality and integrity of the national urban park and the viability of ecological connectivity with the Chebucto Peninsula.

**The Friends of BMBCL support a comprehensive land use planning approach, with combined objectives of ensuring landscape connectivity, maintaining the quality and integrity of the proposed national urban park area and serving the needs of adjoining communities for subdivision access/egress consistent with existing regulations – otherwise, the Friends do not support the subdivision and development of this property in the absence of the recommended comprehensive approach. (Refer to section 4.7)**

### 3.11 Northern Properties

Numerous small private properties occupy the northern perimeter of the proposed BMBCL park area, generally extending eastward from Coxs Lake to Ragged Lake.

The efforts of the Nature Trust in acquiring the 521-acre 'connector' property adjacent to the southeastern border of the former Coks Lake provincial park reserve have effectively consolidated a continuous protected land base over the approximately 13-kilometer distance from Susies and Quarry lakes to Coks Lake. It is understood that the Nature Trust continues to build on this base by negotiating a conservation easement on the Gordon property (with frontage on Coks Lake and a shared boundary with the designated wilderness) and through ongoing investigations regarding other potential land securement opportunities in this area.

In addition, the Provincial Crown continues to own an irregularly-shaped approximately 85-acre parcel in the vicinity of Ash Lake (south of Anahid Drive). This parcel is well-positioned regarding consolidating the northern boundary of the park and to providing potential access to Blue Mountain (the physical landform) and the north-central sector of the proposed park area.

**The Friends of BMBCL support and encourage the continuance of the land securement efforts of the NSNT (and potentially of other partners) and the early transfer of the referenced provincial Crown land to formal designation and inclusion within the adjoining wilderness area.**

### 3.12 Proposed Highway 113 Corridor

In many ways, the proposed Highway 113 corridor represents the proverbial 'elephant in the room'. This proposed transportation corridor extends from just west of Exit 3 on Highway 102 westward almost 10 kilometers to join Highway 103 near Exit 4 and cuts through the heart of the BMBCL 'conceptual park area' as identified in HRM's regional plan (2014). Almost a decade earlier, a comprehensive land use assessment study conducted by a consulting firm (EDM, 2006) essentially concluded that the proposed highway corridor and the BMBCL regional park could co-exist on the available land base. Therefore, both were included in HRM's 2006 regional plan. However, since that time, the 2014 regional plan update was approved, some 5500 acres (extending some 13 kilometres from Susies and Quarry Lake to Coks Lake and overlapping the proposed highway corridor) have been acquired or otherwise secured for park or conservation use and the entire area is now under consideration as a candidate national urban park.

Over the same period, the rationale for this major highway development has increasingly come into question and projected cost estimates have risen dramatically. From the perspective of the Friends of BMBCL, the highway, if built, would create a barrier disrupting the ecological connectivity across the 13-kilometer east-west extent of the park area, undermine the management integrity of the overall park and limit the quality of the park user experience.

**The Friends of BMBCL, in providing input to BMBCL national urban park planning process, will highlight the potential impacts and implications of the Highway 113 proposal and, accordingly, will welcome any decision to defer or cancel this proposed highway development.**

## 4.0 THE MOST PRESSING PRIORITIES

This concluding section is intended to draw out, from the preceding discussion, the major considerations requiring attention and action to move forward toward the successful establishment of the BMBCL area as one of the first additions to Canada's new National Urban Park System.

### 4.1 Committing to Making it Happen

The longstanding position advocated by the Friends of BMBCL has been that park concept planning must be addressed as the highest-order priority, to provide the essential guidance for achieving the successful establishment of the proposed BMBCL candidate national urban park. However, planning is a process that requires time, and competing land use pressures can lead to conflicting land use decisions while park planning is in progress. This said, although the importance of park planning cannot be overstated, partners and stakeholders must maintain a strong commitment and clear focus on the objective of park establishment, during the particularly vulnerable period until such time as plans are being finalized and approved.

**The Friends of BMBCL therefore urge that, as park planning is in progress: (1) the BMBCL national urban park candidate be recognized and treated by the partners, particularly the Municipality and the Province, as a first-order city-building opportunity; (2) land acquisition within the surrounding undeveloped lands continue to be pursued opportunistically; (3) regional and community planning on surrounding lands complement the adjoining national urban park candidate; and (4) existing park and conservation lands be managed responsibly on an interim basis (i.e. until the park is formally established and designated as such).**

### 4.2 Park Concept Planning

As outlined in Section 2.1, park planning encompasses the determination of a park vision and related goals and objectives, documentation of the inherent attributes of the proposed park land and water base, consideration of the potential demands of future park users, and the preparation of corresponding park management and development guidelines. Integral to the park planning process is the proposal of the park's boundary (or of boundary options) within which a viable national urban park management unit can be successfully established.

This said, it is apparent that the proposed BMBCL national urban park ultimately will be 'nested' within an approximately 12,000-acre area of undeveloped land, surrounded by the urban and suburban Halifax (Appendix I). The referenced undeveloped land overlaps with and surrounds existing properties currently dedicated to park or conservation use (i.e., in total, some 5,500 acres secured collectively by DECC, HRM and NSNT). As outlined above (Section 2.1), the proposed park boundary (or boundary options) should be recommended in consideration of park-related criteria intended to ensure the highest integrity of the park as a management unit and the highest quality of the future park user experience.

Park-related land use planning considerations extending beyond the park boundary, including the following:

- identification and protection of corridors for ecological connectivity,
- provision for public access to the park,
- protection of park water quality (and quantity), and
- maintenance of sound buffers and viewplanes/viewsheds.

The final park plan and boundary proposal ultimately can be expected to emerge out of the park planning process, negotiations with owners of properties proposed for acquisition and land use and development planning processes within the surrounding urban/suburban fringe (including, for example, the Highway 102 West Corridor study (which is currently underway as one of the provincially funded Future Communities Background Studies).

**The Friends of BMBCL support the earliest possible, essentially urgent, initiation of park concept planning, including a recommendation of a proposed park boundary (or alternative(s)).**

#### 4.3 Park Land Securement

As indicated, the intervening lands between the proposed park area and the existing surrounding urban and suburban development are under persistent and ever-increasing development pressures (Appendix IV). To date, in the absence of a park concept plan (and therefore of a proposed final park boundary), the securement of parkland (including through acquisition or other means) has occurred opportunistically, with overlapping provincial Crown land (i.e. overlapping the 'conceptual park area' shown in Appendix II, III, IV and V) having been designated formally as wilderness and further, whether through purchase, donation or conservation easement, occurring essentially on an ad hoc basis where opportunities have presented based on landowner interest. All lands secured to date to varying degrees, extend beyond the conceptual park area, as shown in the existing regional plan (Appendix II).

Despite the positive gains of land securement on an opportunistic basis, park planning ultimately must be relied upon to deliberately propose park boundaries that support the achievement of park management objectives and, accordingly, guide and direct park land securement priorities.

**The Friends of BMBCL support the continuance of ongoing land securement efforts within the approximately 12,000-acre undeveloped area on an opportunistic basis; however, also emphasize that park concept planning and corresponding boundary recommendations must be relied upon to provide guidance regarding acquisition of priority lands that are highly valued for overall park management purposes.**

#### 4.4 Coordination with Surrounding Development

While the proposed park area is expected to be defined through the park concept planning process and, ultimately, the securement of the land base as needed for successful park establishment, it nonetheless can be anticipated that undeveloped lands, situated between the park area and surrounding urban-suburban development, will remain in private hands. The use and development of these lands, bordering directly on the formal park, will have significant potential to limit both the integrity of the park management unit and the quality of the park user experience – unless the use and development of these lands are regulated and controlled with due deference to the status of the adjoining national urban park. Specific considerations, as noted in Section 4.2, include:

- identification and protection of corridors for ecological connectivity,
- provision for public access to the park,
- protection of park water quality (and quantity), and
- maintenance of sound buffers and viewplanes/viewsheds.

Therefore, a first-order consideration and concern in HRM's regional plan, which is currently undergoing review and updating, should be to recognize and reflect the elevated status of the BMBCL candidate national urban park, as a primary asset of national significance. Policies within the updated regional plan must therefore provide overriding priority both to national urban park planning within the BMBCL area and to coordinating land use and development planning on adjoining lands – so as not to conflict with the national urban park-establishment priority. Further, regional plan policies must be reflected in related secondary development planning at the community level, and corresponding land use and subdivision by-laws.

**The Friends of BMBCL recommend that HRM's updated regional plan and corresponding secondary plans and related land use and subdivision by-laws give priority consideration to the establishment of BMBCL National Urban Park and that, correspondingly, land use and development planning decisions be deferred until the BMBCL national urban park boundary has been established through the agreement of the primary partners (i.e., HRM, Parks Canada, DECC, NSNT and the Mi'Kmaq) and relevant stakeholders.**

#### 4.5 Annapolis Group Lands

The Annapolis lands command attention due to the profile of the ongoing lawsuit and its anticipated precedent-setting outcome, having gone to the Supreme Court of Canada and now understood to be scheduled to be heard by the Supreme Court of Nova Scotia in April 2024. This said, a significant proportion of the Annapolis lands is included within the conceptual park area as proposed in HRM's regional plan (i.e., in the initial 2006 version and the 2014 update), and it is clear, even in the absence of a formal plan (and corresponding park boundary recommendation or options), that a yet-to-be-determined proportion of the Annapolis lands is critically important if the full potential of the park area is to be realized. The Annapolis lands of primary interest include the shorelines and associated backshores/backlands, immediate

watersheds and viewsapes/viewplanes associated with Washmill, Susies, Quarry and Fox Lakes.

**The Annapolis lawsuit notwithstanding, the Friends of BMBCL support the advancement of efforts, within the shortest possible timeframe, to secure Annapolis lands deemed essential to the realization of the full potential of the BMBCL park area, as determined through the upcoming national urban park planning process (or through an accelerated boundary review process should circumstances dictate).**

#### 4.6 Highway 102 West Corridor Lands

With the pre-development studies of the Highway 102 West Corridor Lands having been initiated with a target completion date of March 2024, and the Friends of BMBCL recognized as a stakeholder group, every effort should be made to influence outcomes that are complementary to and compatible with the adjoining national urban park candidate area. In particular, stakeholder engagement will be interpreted as having opportunity to provide input and to discuss plans as they are being prepared, rather than simply for the purpose of increasing the Friends' 'understanding of the work being completed' through the study (as is the wording in the project RFP). A primary interest or objective of the Friends of BMBCL will be to ensure that concept planning for the national urban park has progressed to a point that effective integration with development planning for adjoining lands can be achieved.

**The Friends group welcomes recognition as a key stakeholder in the Highway 102 West Corridor pre-development study and looks forward to engaging as the study progresses – with the objective of achieving effective input in the pre-development planning phase and thereby ensuring complementarity and compatibility between the development of the 102 West Corridor area and the adjoining national urban park candidate area.**

#### 4.7 Land Use Issues and Options – Western Sector

The proposed land trade to accommodate the extension of Sussex Drive to connect with Eider Drive brought to the attention of the Friends group the complex array of interrelated, overlapping and potentially incompatible land use issues and options at play in this area. Most concerning was (and continues to be) the lack of apparent efforts to coordinate proposals and plans, particularly from the perspective of considering both positive and negative impacts on the BMBCL candidate national urban park area. This problem is apparent both across government departments at the municipal and provincial levels and between the two levels of government.



Proposals and interests at play in the Sussex Drive-Eider Drive-Halliburton Hills-Highland Park area include the following:

- the proposed Sussex Drive-Eider Drive connector road;
- the needed second access/egress option to meet safety and subdivision design requirements for the Halliburton Hills and Highland Park subdivisions (the latter including the Ramar parcel that currently is under development extension);
- the associated land consolidation to enable Piercey Investors' lands to be subdivided around the southern and western shoreline of Maple Lake, and beyond to connect with Halliburton Hills;
- the expropriation of land for the Highway 113 corridor and corresponding settlement proposals respecting lands on Maple Lake, that enable/support shoreline development;
- inadequate consideration of the Halifax Green Network Plan, and direction therein regarding ecological connectivity between the Chebucto Peninsula and the Mainland;
- the 'designation' of the Maple-Upper Sheldrake lake area and surrounding lands as 'core wilderness' as part of the BMBCL 'conceptual park area';
- recognition of the Maple-Upper Sheldrake lake area as both a primary pinch point and remaining opportunity for ecological corridor linkage to the Chebucto Peninsula;
- the recognition of Maple Lake as a primary destination/stopover node on the Upper Nine Mile River canoe route/waterway;
- lack of consideration of impacts on the ecological integrity of proposed parkland and waterways and on the quality of corresponding recreational experiences;
- the recent provincial offer of Crown land (PID: 40090367) for housing, without any apparent consideration of land use relationships involving the proposed national urban park area and adjoining subdivisions;
- the rejection, without due consideration, of land use and development concepts prepared on behalf of the Friends group to advance a more integrated and mutually-beneficial land use approach in this area; and
- little or no indication, to date, of any action or commitment to coordinate efforts toward to achievement of a much-needed integrated land use approach.

Clearly, a coordinated approach is needed to achieve the integration of the multiple land use objectives at play in this area. In this regard, the key players include but are not limited to:

- within HRM, the Parks and Recreation and Planning and Development departments
- within the Province, DECC (Protected Areas), DNRR (Wildlife), DPW (Transportation)
- NSNT
- Parks Canada
- Mi'kmaq

- directly affected private landowners
- primary stakeholders (including Friends of BMBCL) and community representatives.

**Friends of BMBCL recommend the creation of a ‘comprehensive planning area’ and a corresponding land use planning initiative to address and resolve the multiple outstanding land use issues in the Maple Lake-Coxs Lake (including Haliburton Hills-Highland Park subdivision) area. This is a matter of urgent land use concern and should be addressed as part of and in concert with the pending park planning process for the BMBCL candidate national urban park.**

## 5.0 SUMMARY

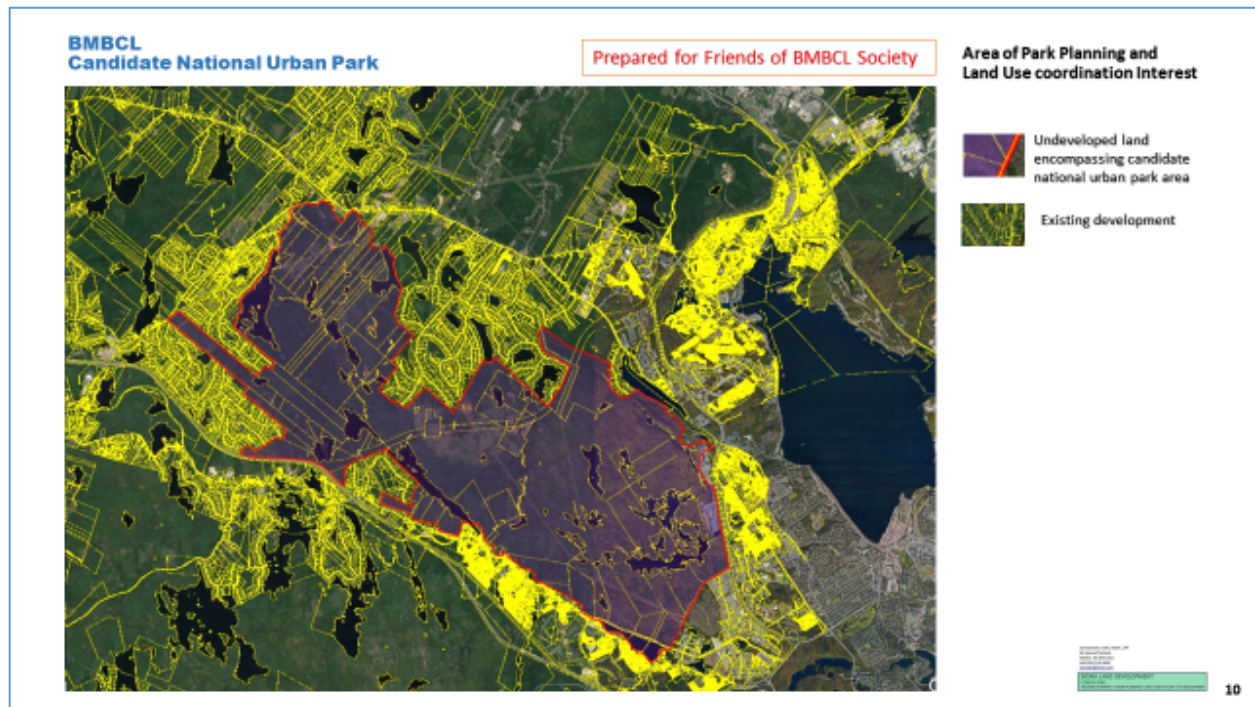
The most pressing and immediate needs include:

- recognition of the significance of the park establishment opportunity, acquisition of critical private lands, and responsible interim management;
- coordination of park concept planning on the parts of the primary partners and stakeholders; and
- commitment to complementary land use planning and development on surrounding lands.

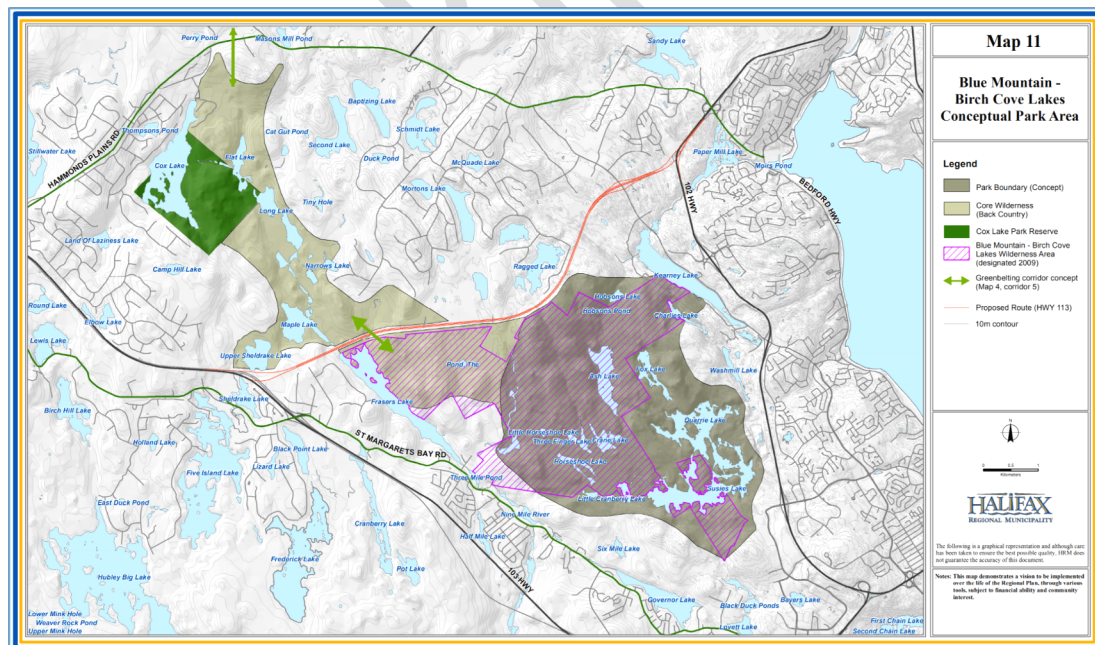
The national urban park candidacy, combined with the accelerated development pressures caused by Halifax’s rapid population growth and expansion, calls for a cooperative and coordinated approach to ensure that BMBCL national urban park is fully and effectively integrated within the developed landscape that will surround. A high-priority one-of-a-kind approach must be adopted, to ensure that the BMBCL national urban park is recognized as a city-building asset that will bring corresponding unique opportunities and benefits to both HRM and the province overall.

## APPENDICES

### Appendix 1: Area of Park Planning and Surrounding Land Use Coordination Interest

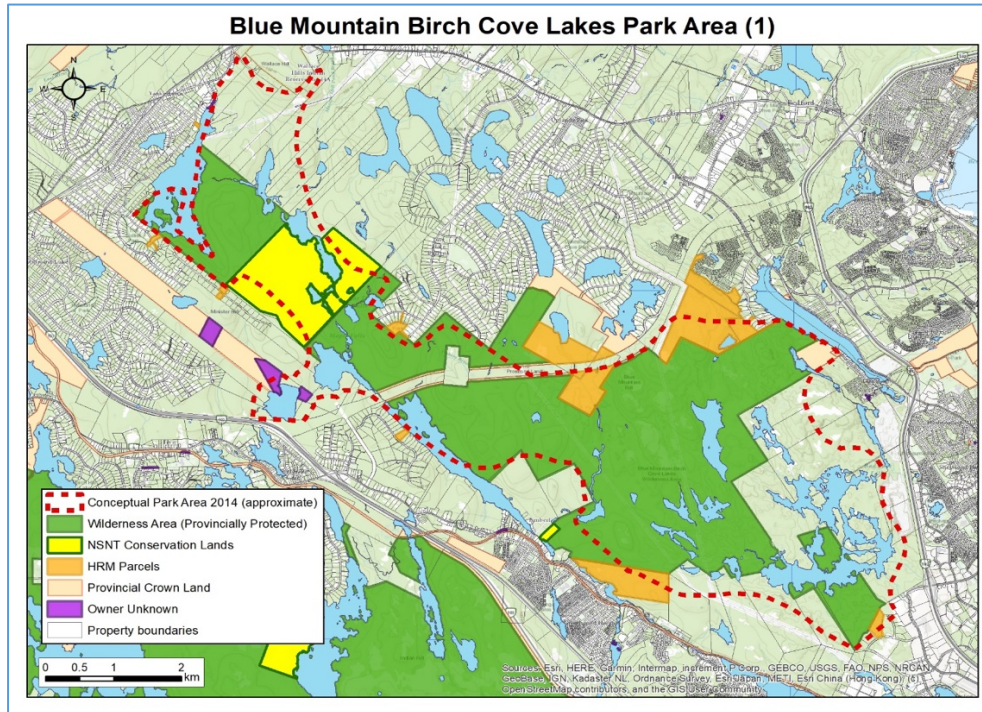


### Appendix II: Conceptual Park Area, BMBCL Regional Park, 2014 Regional Plan

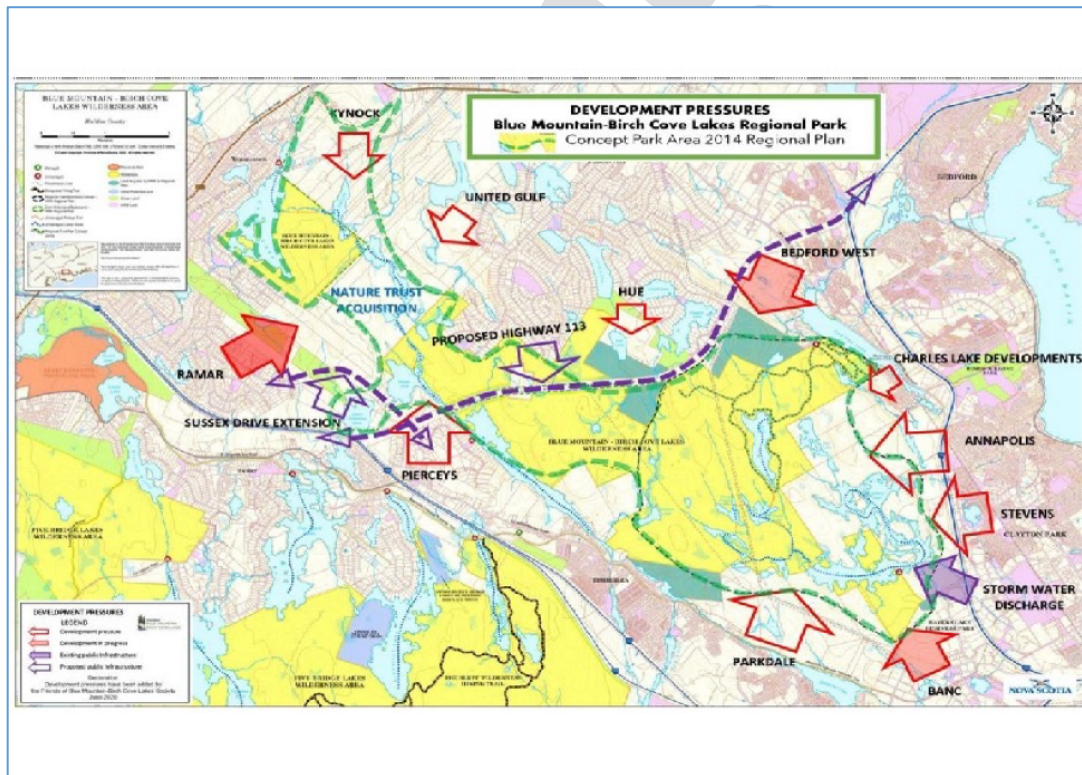




### Appendix III: Conservation Lands, BMBCL Park Area

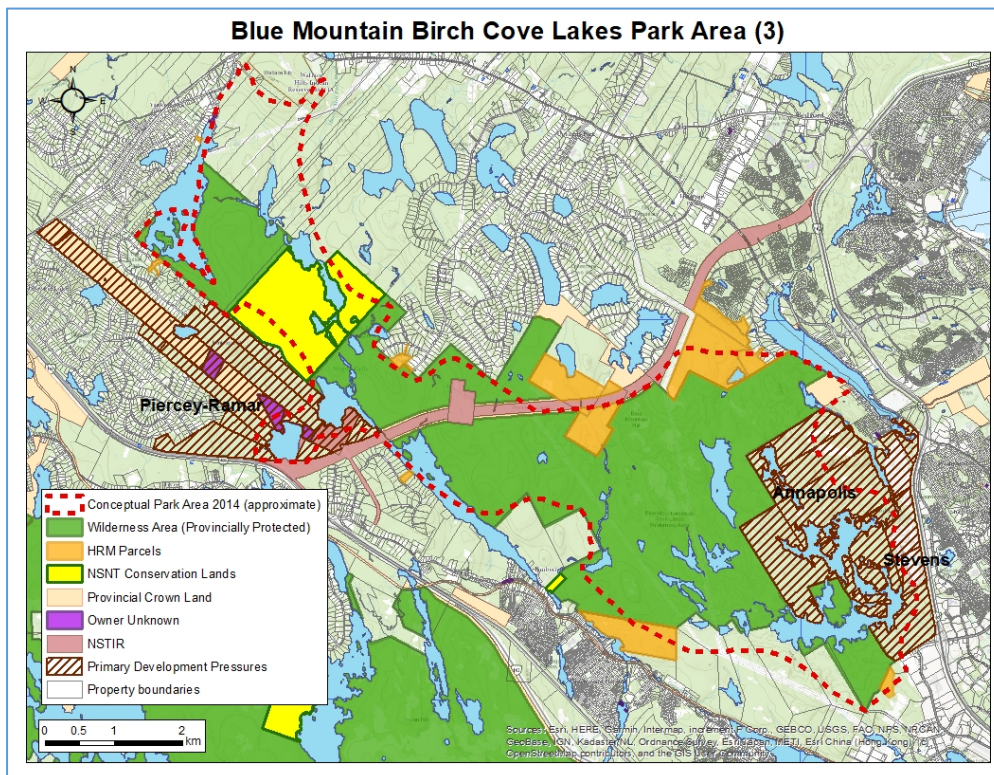


### Appendix IV: Development Pressure





## Appendix V: Primary Development Pressures



## Appendix VI: BMBCL Partnership Lands Map (May 23, 2023, HRM Staff Report)

