



From: Board Chair <chair@bluemountainfriends.ca>
Sent: Wednesday, March 18, 2026 4:57 PM
To: Grant, Ross <grantro@halifax.ca>; ronswan@ronswan.net <ronswan@ronswan.net>
Subject: Highway 102 West Corridor Special Planning Area - CARP Submission

Good Afternoon Mr. Grant

I am writing on behalf of the Friends of Blue Mountain Birch Cove Lakes Society, in regard to the submission from CARP (Canadian Association of Retired Persons), commenting on the Special Planning Area listed above.

At a recent Board Meeting of our Society, we unanimously endorsed a motion to lend our support to the CARP Submission Paper, which I have attached here for reference.

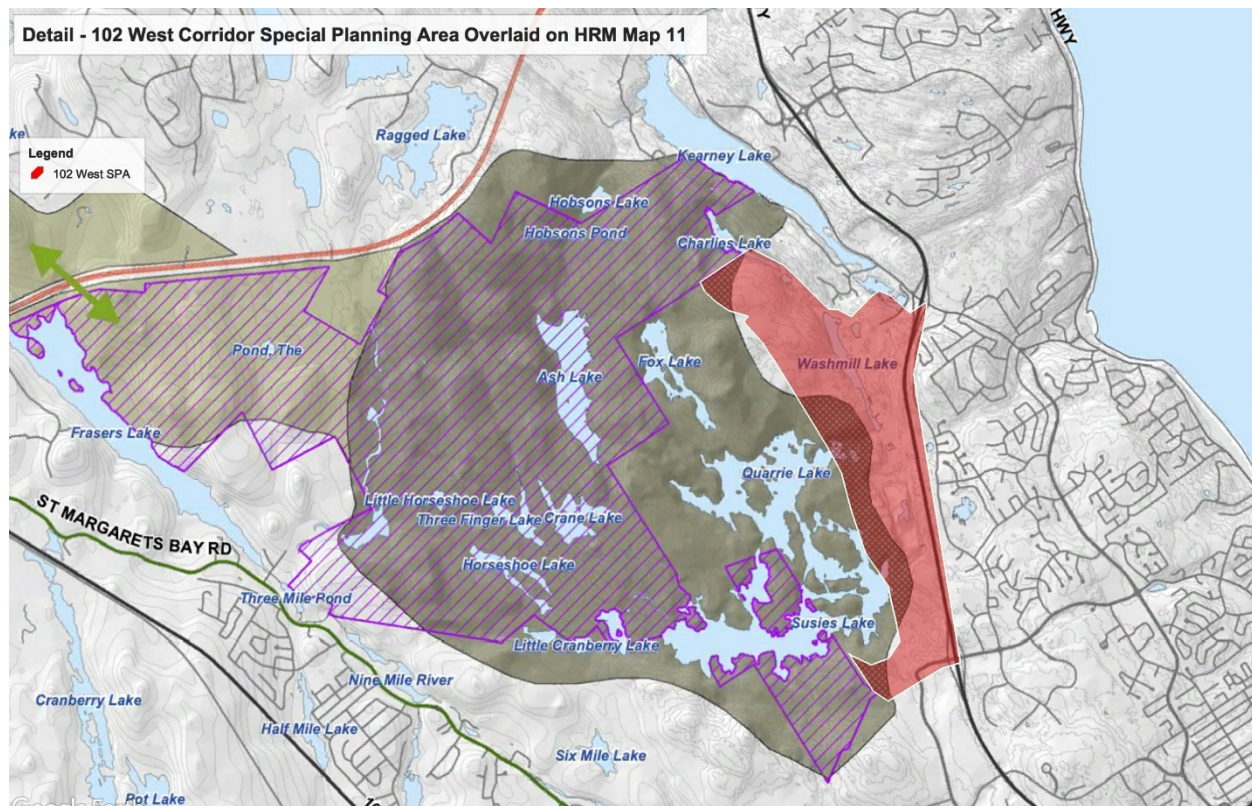
In particularly I wish to reinforce our whole-hearted agreement with the suggested Coordinated/collaborative approach detailed on Page 6 of their submission, which provides a clear and responsible path to properly consider the necessary safeguards for a future National Urban Park, in light of such intensive development pressure, as proposed by this Special Planning Area threat.

Thank you for your continued consideration.

Sincerely
Mary Ann McGrath
Chair, Friends of BMBCL Society

Initial Comments and Recommendations

Proposed Development Concept(s) Highway 102 West Corridor Special Planning Area



Special Planning Area overlaps proposed BMBCL 'Conceptual Park Area'
Coordination of Park Planning and Development Planning is Critical

Submitted by:
Canadian Association of Retired Persons, Nova Scotia Chapter (CARP NS)
December 9, 2025

Introduction and Context

The following submission is forwarded in reference to the proposed development concepts (by Stevens and Annapolis) for the Highway 102 West Corridor Special Planning Area, with a particular focus on the relationship of the combined development proposals to the potential future environmental integrity and management viability of the Blue Mountain-Birch Cove Lakes (BMBCL) Candidate National Urban Park. These comments/recommendations are referenced as initial, as they are based on information provided via the recent public open house sessions held in St. Peter's Anglican Church Hall on November 19th and are subject to more in-depth follow-up review.

Problem Statement – Proposed Development Overlaps with Candidate National Urban Park

The Highway 102 West Corridor Special Planning Area overlaps directly with the eastern margin of the BMBCL 'conceptual park area', as set out initially in HRM's 2006 regional plan and reaffirmed in the 2014 regional plan update. The area of overlap includes the Birch Cove Lakes (primarily Susies and Quarry lakes) and their southern and eastern shorelines and associated backshore areas. The major intensive residential development (almost 19,000 housing units to accommodate an estimated population of 40,000 people¹) of this area, as proposed, would impact dramatically on and reduce the natural quality and integrity of the proposed park area and, effectively, challenge the future viability of this area as manageable park unit – especially in the context of the expectations and standards associated with a national urban park. Another way to highlight this concern is to emphasize that these namesake lakes (i.e. the Birch Cove Lakes) occupy perhaps 10-20% of the conceptual park area while contributing in the order of 80-90% of the park's potential natural value and public outdoor recreational appeal.

CARP NS's recommendations are highlighted on Page 6.

CARP NS's Interest and Approach

CARP NS has long advocated for the creation of the proposed BMBCL park, initially as a major regional park within HRM and then, following the establishment of the National Urban Park Program in 2021 and the confirmation of the BMBCL area's candidacy for designation in 2023, as a national urban park. CARP, nationally, has endorsed the National Urban Park Program as well as the efforts of our Nova Scotia chapter, in our advocacy for the early establishment of the BMBCL candidate. The core objectives of national urban parks include conserving nature, connecting people with nature and advancing reconciliation with Indigenous peoples. In this context, the BMBCL proposal is a nationally-significant initiative that stands out as the only viable candidate east of Toronto for national urban park status.

CARP NS, as an organization known for its advocacy of interests typically associated with seniors, also recognizes that environmental integrity and sustainability is in the interest not only of seniors but of all

¹ For context, the estimated population of 40,000 people relates to other population centres in Nova Scotia, as follows (2021 census, rounded): Pictou County (43,700); Greater Truro (46,200); Lunenburg County (48,600) and Kings County (62,900).

Nova Scotians. The BMBCL candidate national park, beyond its potential environmental significance, offers an iconic opportunity to support active and healthy lifestyles through access to and participation in outdoor recreation in a near-urban wilderness setting. As such, the BMBCL candidate is a nationally-significant asset unmatched in other Canadian cities.

CARP NS also recognizes and understands that Halifax, as a vibrant and fast-growing urban centre, is challenged by urban growth and development pressures, including the need for housing. It is clear that this challenge, with the approval of the Highway 102 West Corridor special planning area process, has now arrived at the front doorstep of the BMBCL candidate national urban park.

The CARP NS approach is to promote collaboration and coordination of interests and efforts in order to find practical and pragmatic solutions to problems and associated challenges. In the case of competing efforts to establish the BMBCL national urban park and of those focused on urban development in surrounding areas, including the Highway 102 West Corridor Area, CARP NS recognizes that collaboration and coordination have not been a priority practice to date. This recognition has been highlighted by CARP NS in discussions with relevant political leaders and senior staff at various levels of government, with other stakeholders and with developers, and we expect to continue these efforts. The benefit of the recent open house sessions on November 19 is that the players involved have put their respective cards on the table, and there is now opportunity to work toward resolution of priority issues that must be addressed.

The BMBCL Park Establishment Process has been Challenging and Slow

Following the initial HRM regional park proposal in 2006 through to the current national urban park candidacy (as confirmed in 2023), progress toward formal park establishment unfortunately has been discouragingly and frustratingly slow from the perspective of external stakeholders and supporters of the park. Even so, it must be acknowledged that significant progress, albeit on an ad hoc and opportunistic basis, nonetheless has been made – including the formal designation of associated Crown land as wilderness by the Province, the acquisition of several available properties by HRM (supported by federal funding and negotiated with adjoining landowners through the development approval process) and the securement of three additional properties by the Nova Scotia Nature Trust (through acquisition, donation and conservation easement agreement). In total, more than 5,500 acres of land have been assembled in the area of for park and/or conservation purposes.

This said, substantial acreages with significant potential and desirability for inclusion in the proposed park area remain in private hands, including those within the Highway 102 West Corridor area that overlap with the conceptual park area and are currently proposed for development.

Disconnection of Park Planning and Development Planning

As noted, the assembly of park and conservation lands in the BMBCL area has occurred opportunistically, on an ad hoc basis and without benefit of a park vision, concept or plan. Consequently, there is an absence of clarity regarding the commitment toward the aspirational park boundary and corresponding acquisition priorities as needed to complete the assemblage of a coherent park management unit.

In the absence of such a commitment, the Partnership Group² responsible for park planning and park establishment has focused on the lands owned by one or other of the partnership members. Park planning efforts to date therefore have been directed inwardly, while ignoring pursuit of land acquisition priorities and options relating to the balance of the conceptual park area.

At the same time, private land within the conceptual park area is being treated both by HRM (Planning and Development Department) and by respective adjoining land owners/developers as if the proposed park area is neither real nor relevant. This disconnect is made clear by material released at the recent public open house sessions for the Highway 102 West Corridor area, where the development planning process and development concepts as presented respectively by HRM planning and development staff and by developers essentially make no reference to the overlap with the conceptual park area associated with the national urban park candidate.

This is a classic case of the left hand and the right hand not knowing what the other is up to – not only not knowing but also seemingly not recognizing the relevancy of taking into account the interests, plans and future actions of the other.

Supporting Maps Available

The following series of maps is germane to the preceding discussion of the overlap between the conceptual park area and the Highway 102 West Corridor planning area, and to the recommendations that follow. As this level of detail is challenging to integrate into a relatively brief submission, the indicated maps are simply listed to advise of their availability and relevance as references in support of anticipated presentations at future meetings and discussions. Note that Map 10 is highlighted on the cover page.

1. The EDM Consultant Study Recommendation (2006)
2. Conceptual Park Area (2006 Regional Plan)
3. Conceptual Park Plan (2014 Regional Plan)
4. Development Pressures (illustration)
5. Partnership Lands (May, 2024)
6. Partnership Lands compared to Conceptual Park Area
7. Highway 102 West Corridor Special Planning Area (May, 2025)
8. Special Planning Area compared to Partnership Lands
9. Special Planning Area overlapping Conceptual Park Area (broad view)
10. Special Planning Area overlapping Conceptual Park Area (closer view, included on **cover page**)
11. Stevens Group Development Proposal (November, 2025)
12. Annapolis Group Development Proposal (November, 2025)
13. Stevens and Annapolis Development Proposals Combined

² The Partnership Group is comprised of Parks Canada, Halifax Regional Municipality (Parks and Recreation Department), the Province (Department of Environment and Climate Change), the Nova Scotia Nature Trust and the Mi'kmaq of Nova Scotia (Kwilmu'kw Maw-klusuaqn (KMK) and Sipekne'katik First Nation).

CARP NS's Position re Planning for the Highway 102 West Corridor and BMBCL National Urban Park

Recommendations to advance the establishment of the BMBCL National Urban Park are appropriately directed to the members of the Partnership Group (as identified previously) that is mandated to lead efforts toward the planning and establishment of BMBCL National Urban Park. Although not advanced in this document, such recommendations relate to the recognition of the iconic status of the BMBCL national urban park initiative, commitment to the provision of effective leadership and the establishment of an effective governance model, initiation of a comprehensive park planning process, provision for stakeholder and public engagement and, in relationship to adjacent development, the integration of park planning interests with development initiatives on surrounding lands.

The recommendations that follow focus on the areas of overlap and interface between the conceptual park area and the Highway 102 West Corridor Special Planning Area. In regard to addressing this area over overlap or interface between proposed park area and proposed development, CARP NS recognizes four scenarios, as follow:

1. Remove the special planning area designation from the Highway 102 West Corridor Area.
2. Defer the secondary planning process for the Highway 102 West Corridor Area until a park vision, concept or plan has been prepared (that can serve as a basis for identifying and addressing land use conflicts deriving from above-reference competing and/or conflicting objectives.
3. **Establish a coordinated joint-planning effort to integrate planning of the candidate park and of the Highway 102 corridor area**, with the dual objectives of (1) establishing a viable park management unit that ensures the integrity of the natural environment and the quality of the park user experience, and (2) preparing a residential development concept that is supportive of and enhanced by the adjacency of the park area and thereby benefits the overall development.
4. Proceed with park planning and development planning, essentially as if each is a separate and unrelated process, with little or no influence on or relevance to the other.

It is understood that some comments/recommendations that have been (or will be) submitted advocate along the lines the first and/or second scenarios above. Should either of these be adopted, CARP NS would be supportive, as the time-sensitive element created by development pressures would be reduced and opportunity to advance a park vision, concept or plan would be enhanced. However, given the commitment to proceeding with the Highway 102 Special Planning Area (on the parts of both the provincial and the municipal government and the apparent development interests/priorities of the landowners/developers involved), removal or deferral of the development planning priority for this area is presumed to be a 'long shot'.

On the other hand, if the process continues along the lines of Scenario 4, which is the current situation, significant negative and irreversible impacts on the national urban ark opportunity are inevitable.

All of the above being considered, CARP NS recommends a coordinated joint-planning initiative, as referenced in Scenario 3, above, and discussed in greater detail immediately below.

CARP NS's Recommended Approach

In short, CARP NS's recommended approach is to establish a coordinated joint-planning effort as a strategy for integrating the planning of the candidate park and the Highway 102 corridor areas, with the dual objectives of: (1) establishing a viable park management unit that can assure the integrity of the natural environment and the quality of the park user experience; and (2) working toward a residential development concept that is enhanced by and thereby benefits from the adjacency of a national urban park. To be effective, the recommended joint planning process must emphasize openness and transparency, and include ample provision for effective and impactful stakeholder engagement and informed public input.

Specific park-related criteria to guide planning for compatibility along the interface of the proposed park and adjoining Highway 102 West Corridor development area, include:

- protection of the integrity of the water quality and quantity in the Birch Cove Lakes (which, among other things, brings into question aspects of the proposal relating the infilling of wetlands and re-shaping of the associated terrain to accommodate development);
- protection of the natural condition of the shorelines and associated backshore areas of the Birch Cove Lakes (including Susies, Quarry and Washmill lakes) as public parkland, through negotiation of site-specific criteria to ensure sufficient private development setback;
- provision for the establishment of a primary national urban park access corridor and of essential land base to support associated park infrastructure;
- identification of options for securement of priority lands for park purposes, through the following, singly or in combination, including:
 - open space allocation as part of the subdivision planning and approval process,
 - utilization of a development agreement approach,
 - land trade(s), potentially considering peripheral lands assembled by members of the Partnership Group and/or other lands held by members of the Partnership,
 - landowner donations, with associated taxation benefits to the landowner(s) and other considerations (e.g. partnership options, recognition as city-builders/patrons),
 - involvement of land trusts (Nature Trust, Nature Conservancy), and/or
 - direct acquisition of priority areas to serve as parkland.
- establishment/maintenance of an open and transparent outreach program to inform, encourage and enable public input and to effectively engage committed stakeholder organizations.

CARP NS Initiative and Activity Going Forward

CARP NS will continue to advocate for openness and transparency, including provision for the dissemination of information and provision for public input and effective stakeholder engagement. Meetings and discussions with responsible political players, senior staff within all three levels of government, other stakeholders and relevant land owners/developers to make the case for successful park establishment.

/December 9, 2025