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HALIFAX

P.O. Box 1749
Halifax, Nova Scotia
B3J 3A5 Canada

Heritage Advisory Committee
September 23, 2015

TO: Chair and Members of the Heritage Advisory Committee

SUBMITTED BY: Original Signed by _____
Bob Bjerke, Chief Planner & Director, Planning and Development

DATE: September 4, 2015

SUBJECT: Case H00406: Substantial Alteration to St. David's Church, 1544 Grafton Street, Halifax a municipally registered heritage property

ORIGIN

Request by Studio Works International Inc.

LEGISLATIVE AUTHORITY

The Heritage Property Act.

RECOMMENDATION

It is recommended that Heritage Advisory Committee recommend that Regional Council approve the substantial alteration to St. David's Church, 1544 Grafton Street, Halifax.

BACKGROUND

St. David's Church is located at 1544 Grafton Street, however also has frontage on both Blowers and Brunswick Streets. The Church faces Grafton Street, up on a slight rise and has a significant set back from the street. To the rear of the church is an attached church hall which was constructed in 1951 which has its entrance on Brunswick Street. The property has both provincial and municipal heritage registration status.

St. David's Church, constructed in 1868-69, is valued for its association with several religious denominations – Methodist, Presbyterian, Congregationalists and finally the United Church of Canada. The building is valued for its association with the architect David Sterling who designed this rare brick Victorian Gothic building. A request has been made by Studio Works Inc., on behalf of the congregation of the Presbyterian Church of St. David, to substantially alter 1544 Grafton Street, Halifax (Map 1).

The applicant has indicated that due to declining congregations and the costs of maintaining the heritage building, there is a need to ensure future financial sustainability through the development and leasing of the proposed mixed-use addition to the building. Presently the church hall is outdated, does not meet accessibility needs, and exceeds space requirements for the church (Attachment A).

Existing Site Context

The property subject site is approximately 1.27 hectares in size, and is a 'through lot' which has frontage on three streets (Brunswick, Blowers and Grafton Streets) and contains the existing St. David's Church and hall. The Church is zoned ICO (Institutional, Cultural & Open Space) Zone, and recently the rear portion of the property which contains the hall was rezoned to the DH-1 (Downtown Halifax) zone. The property is surrounded by other prominent heritage properties: St. Mary's Girls School, St. Mary's Basilica, and Royal Artillery Park.

The proposal received Ministerial approval, for the proposal substantial alteration to a provincially registered heritage property, on December 2, 2014 with the condition that the property owners comply with any minor design amendments required by Halifax Regional Municipality (Attachment B).

Proposed Development

The proposed redevelopment will see the removal of the church hall on Brunswick Street and the construction of a new 7 storey mixed-use building addition (Attachments C-G). The new construction includes:

- 6 floors of residential use totalling 67 units;
- ground-floor commercial space totalling 470 square metres;
- leasable space for the church (offices, meeting spaces, and washrooms); and
- internal parking and services areas, accessed from Blowers Street.

The proposal includes a request to subdivide the property which will effectively place the new building and church on independent lots (Map 2). It is anticipated that a separate request to deregister the new lot housing the mixed-use building will be submitted in the near future.

Additionally, on the eastern side of the building there is a small grave yard, and other burials are in situ under the foundation of the church hall. The developer has indicated that they have been working with staff at the provincial department of Communities, Culture and Heritage to secure Heritage Research Permits, and ensure that the *Cemeteries and Monuments Protection Act* is being adhered to when relocating the burials.

Substantial Alteration

In accordance with Section 17 of the *Heritage Property Act* (HPA), a substantial alteration to a municipal heritage property requires Regional Council approval. The HPA defines a substantial alteration as meaning "any action that affects or alters the character-defining elements of a property". Therefore a determination on the appropriateness of a substantial alteration lies in its effect on the property's unique

heritage value and character defining elements. The HPA defines heritage value as “*the aesthetic, historic, scientific, cultural, social or spiritual importance or significance for past, present or future generations and embodied in character-defining materials, forms, locations, spatial configurations, uses and cultural associations or meanings.*” Accordingly, the character-defining elements of a heritage building are defined as “*the materials, forms, location, spatial configurations, uses and cultural associations or meanings that contribute to heritage value and that must be sustained in order to preserve heritage value.*”

Heritage Value & Character-Defining Elements

In order to determine the appropriateness of a substantial alteration, a full understanding of the building's heritage values and character defining elements is needed. As a point of reference, staff have prepared a heritage building summary which outlines the heritage values and character defining elements for St. David's Church (Attachment G). This information was created using the historical information contained in the HRM's heritage property file, additional staff research, and information submitted by the applicant as background to their proposal.

Requested Alterations

The applicant has requested permission to remove the existing church hall, build a new rear addition, and to subdivide the land so that the new addition is on its own parcel of land. Heritage staff have determined that the existing church hall, built in 1951, does not hold any heritage values or character defining elements for St. David's Church. Therefore, the removal of the hall is not a substantial alteration to the heritage property. There are no alterations to the St. David's Church proposed.

However, the land on which the hall sits does hold heritage values, and therefore the request to subdivide the land is a substantial alteration requiring Council approval. The land on which the church hall sits, known as the Grafton Street Methodist Burying Grounds, holds heritage values associated with the Methodist Church. Protected by the *Cemeteries and Monuments Protection Act*, any archaeological work on the site will be undertaken in accordance with Heritage Research Permits and will be overseen by staff at the provincial Department of Communities, Culture and Heritage.

Regulatory Context and Approval Process

The Standards and Guidelines for Historic Places in Canada (Standards and Guidelines) are used to evaluate proposed alterations to registered heritage buildings in HRM. The Standards and Guidelines help to ensure that careful consideration is given to how the proposed alteration may affect the heritage values and character defining elements of the building. The first nine Standards are to be considered for all proposals, and additional Standards may apply depending on if the project involves rehabilitation or restoration. An evaluation of the proposal, as it pertains to the Standards and Guidelines, is included in Attachment H.

The proposal is also subject to the Downtown Halifax Land Use By-law. Development proposals must conform to the land use and building envelope requirements of the Land Use By-law as well as meet the requirements of the By-law's Design Manual which includes Heritage Design Guidelines.

In this instance, the Development Officer has reviewed the proposed building addition and determined that it is subject to the *Substantive Site Plan Approval Process*. This process requires that a recommendation regarding the evaluation of the proposal against the Heritage Design Guidelines will be made by planning staff through to the Design Review Committee and Development Officer. Should Regional Council approve the substantial alteration to the heritage property, and the Substantive Site Plan application be approved, the permits necessary to authorize construction can be issued. However, if Council refuses the substantial alteration to the heritage property the owners may choose to make the alteration after three years from the date of the application, but not more than four years after the date of the application, in accordance with Section 18(3) of the *Heritage Property Act*.

DISCUSSION

The project proposes two alterations which affect the heritage values and character defining elements of the property. Some existing burials will need to be relocated; burials under head stones visible at the side of the property, and those presently in situ under the church hall. The second alteration is the subdivision of the property into two separate parcels. Both of these alterations will affect the 'materials, forms, location, spatial configurations, uses and cultural associations or meanings' which contribute to heritage values of the site. However, the heritage values associated with the earlier Methodist use of the land are being mitigated as the work being undertaken by archaeologists and under the direction of provincial staff who administer the *Cemeteries and Monuments Protection Act*. Additionally, commemoration of the Methodist values could occur on the Church land and further mitigate the effect of these alterations.

Staff have completed a full evaluation of the proposal using the Standards and Guidelines (Attachment H), and raise Standards 1, 3, 6 and 11 for discussion.

Standard 1 recommends the conservation of the heritage value of an historic place, and does not recommend the removal or substantial alteration of its intact or repairable character-defining elements. However, the archaeological work has been undertaken in accordance with sound archaeological methodology and practices, and the heritage values will remain intact.

Standard 3 recommends the conservation of heritage value by adopting an approach calling for minimal intervention. Standard 6 recommends to protect and preserve archaeological resources in place. Where there is potential for disturbing archaeological resources, take mitigation measures to limit damage and loss of information.

Standard 11 recommends that new additions or new construction to an historic place should be physically and visually compatible with, subordinate to, and distinguishable from the historic place. Physical compatibility refers to choosing construction materials won't cause deterioration or damage to the fabric of the existing building, both short term and long term. Accomplishing visual compatibility, which is also subordinate to and distinguishable from the historic place, is generally successful when the right balance between imitation and contrast has been found. In the case of St. David's the massing and form of the new construction is in distinct contrast to the Church, but it is successful in its use of materials and colour palette. The new construction leaves the Church completely intact, and occurs behind the Church facing Brunswick Street. The new construction will appear more like a new building than an addition to the Church.

Conclusions

The heritage values and character defining elements of St. David's Church will remain intact. In order for the new development to occur a minimal intervention approach was taken that conserves St. David's Church but requires the subdivision of the land to allow for a new building at the rear of the Church. The redevelopment also requires intervention to some burial sites of the Grafton Street Methodist Cemetery, but this work is being undertaken by professional archaeologist and in accordance with the *Cemeteries and Monuments Protection Act*. For the reasons outlined in this report heritage staff believe this proposal meets the Standards and Guidelines and recommend for approval.

FINANCIAL IMPLICATIONS

The HRM costs associated with processing this application can be accommodated within the approved 2015/16 operating budget for C310 Planning & Applications. HRM is not responsible for construction and renovation costs.

COMMUNITY ENGAGEMENT

The community engagement process for a heritage registration is consistent with the intent of the HRM Community Engagement Strategy. The level of community engagement was information sharing achieved through public accessibility to the required Heritage Advisory Committee meeting.

ALTERNATIVES

1. The Heritage Advisory Committee may recommend that Council refuse the proposed substantial alteration to St. David's Church as outlined in this report. The Heritage Property Act does not include appeal provisions for decision of Council regarding substantial alterations, however, the owners would be permitted to proceed with their proposal three years from the date of the application in accordance with section 18 of the HPA. This is not the recommended course of action as staff advise that the proposed alterations be approved for reasons outlined in this report.

ATTACHMENTS

Map 1	Location Map
Map 2	Preliminary Subdivision
Attachment A	Request for Substantial Alteration to St. David's Church
Attachment B	Ministerial Approval to Substantially Alter St. David's Church
Attachment C	Proposed Development – Grafton Street Elevation
Attachment D	Proposed Development – Brunswick Street Elevation
Attachment E	Proposed Development – Blowers Street Elevation
Attachment F	Proposed Development – Library Elevation
Attachment G	Heritage Building Summary
Attachment H	Standards & Guidelines Evaluation

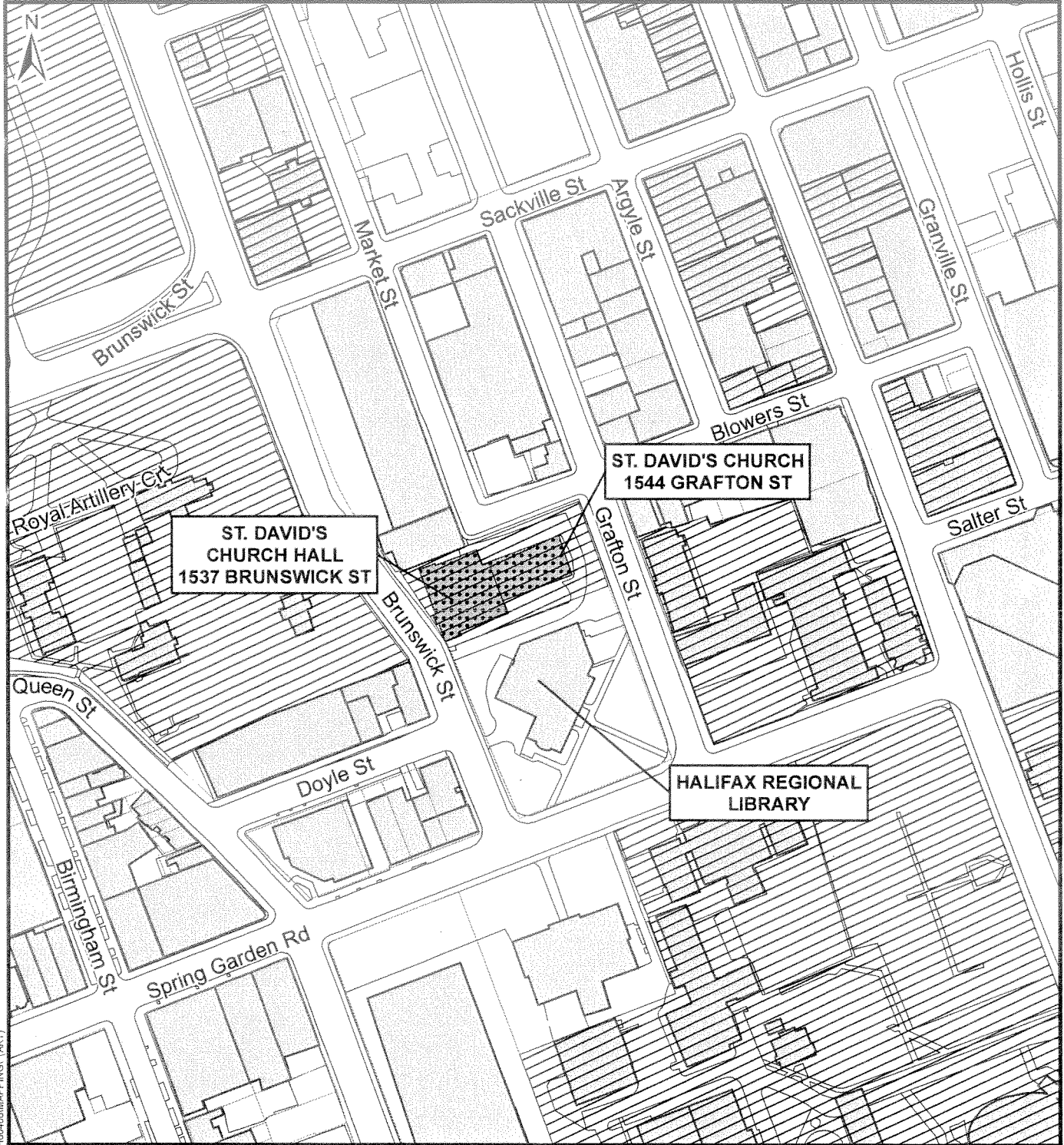
A copy of this report can be obtained online at <http://www.halifax.ca/commcoun/index.php> then choose the appropriate Community Council and meeting date, or by contacting the Office of the Municipal Clerk at 490-4210, or Fax 490-4208.

Report Prepared by: Maccie Holm, Heritage Planner, 490-4419

Original Signed by

Report Approved by:

Jacob Ritchie, Urban Design Manager, 490-6510



Map 1 - Location Map
 St. David's Church - 1544 Grafton Street



Application Location



Building



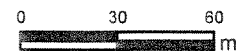
Existing Municipally Registered
 Heritage Property



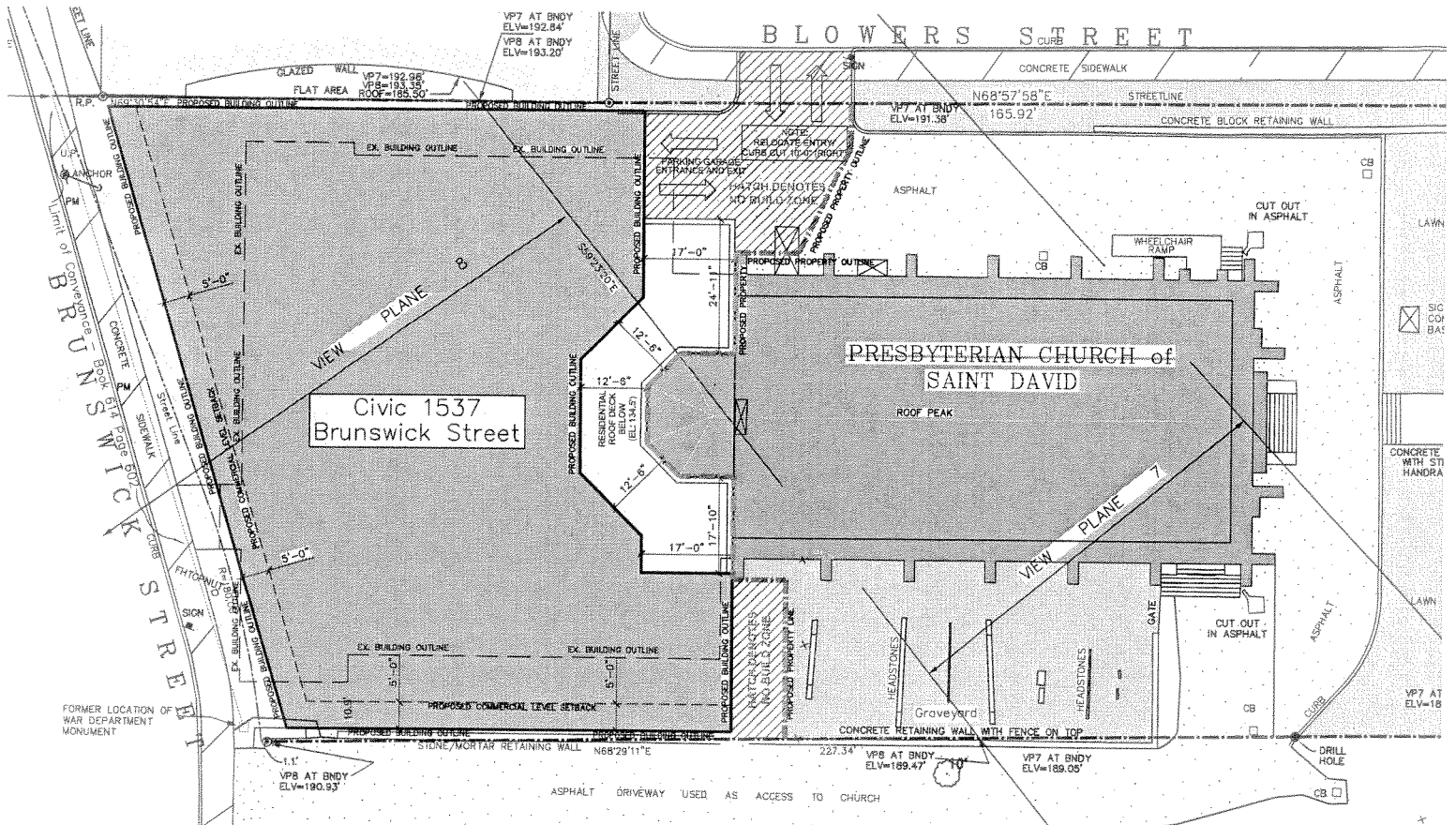
Property Parcel

HALIFAX

Planning & Development



Scale 1:1,500



STUDIO WORKS

2175 WALKER STREET
 HALIFAX, NS B3H 2Y9
 TEL: (902) 421-1111
 WWW.STUDIOWORKS.NS.CA

1537 BRUNSWICK ST. HALIFAX, N.S.

GREENWOOD LANE DEVELOPMENTS
SITE LAYOUT
 1537 BRUNSWICK ST. HALIFAX, N.S.

SCALE	1/16"=1'-0"	DESIGN NO.	
DATE	09/13/12		
DESIGNER	AM		S01
PROJECT	SD1201	REV.	2 (JAN 18, 2013)



ARCHITECTURE • PLANNING • INDUSTRIAL DESIGN • PROJECT MANAGEMENT

MEMO: St. David's Church Redevelopment

DATE: July 21, 2014

TO: Seamus McGreal, Heritage Planner
Planning Applications, Western Region
P.O. 1749, Halifax, Nova Scotia B3J 3A5
490-5113

RE: The Presbyterian Church of St. David, 1537 Brunswick St., Halifax, N.S.
Substantial Alteration to a Heritage Property: Land Subdivision, removal of the Church Hall and retention of the Historic Church Structure.

Mr. McGreal,

On behalf of the property owner, the congregation of the Presbyterian Church of St. David, it is our intention to make an application for a substantial alteration to a municipal heritage property in accordance with the Heritage Property Act. The proposed **Substantial Alteration Application** will allow a subdivision of the current St. David's Church property, to demolish the church hall structure located on the western portion of the property. The remaining and significant church building fronting Grafton and Blowers Street shall be retained and extensively renovated. The existing site is home to the Presbyterian Church of St. David, a registered municipal and provincial heritage property. The church hall is not registered provincially, is a later building addition and has no significant heritage value.

Sharing a condition of many heritage churches in Halifax, St. David's is facing a declining congregation and the soaring costs of maintaining a heritage building. To ensure a future of financial sustainability, a portion of the property containing the church hall shall be leased and developed into a mixed use building. Prior to development, the leased property, requires several applications including heritage deregistration, rezoning, property subdivision and a DH-1 site plan approval. The subdivision of the lot and demolition of the hall is an essential step in allowing the proceeds from leasing and development of the site to contribute toward the preservation and maintenance of the remaining St. David's Church.

Attached is a detailed site plan showing the proposed extent of land subdivision and demolition of the hall, and a letter from the trustees of the Presbyterian Church of Saint David cosigning this application. The provincial heritage deregistration is currently in progress and we have no new materials to attach that were not included in our previous application dated February 27 2014. For updates on progress please get in touch with Kevin Barrett at Provincial Heritage.

We know you are aware that we have many other applications contingent on this one, and thank you in advance for your consideration of this application.

Respectfully Submitted

Original Signed by

Ronald V. Smith, MRAIC, NSAA, NLAA, OAA

2014-07/30



The Presbyterian Church of Saint David

1537 Brunswick Street
Halifax, N.S. B3J 2G1
(902) 423-1944

Minister: The Reverend Kenn Stright

July 27, 2014

Halifax Regional Municipality,
Planning Applications, Western Region
P.O. 1749, Halifax, Nova Scotia B3J 3A5

As property owner of 1537 Brunswick St. the Presbyterian Church of Saint David is aware of and authorizes Studioworks International Inc. on behalf of 3278915 Nova Scotia limited to apply for any applications pertaining to the redevelopment of 1537 Brunswick St.

The trustees of the Presbyterian Church of Saint David

Original Signed by

MURRAY W. ALARY
TRUSTEE

MALCOLM B. MACLEAY
TRUSTEE



Communities, Culture and Heritage
Office of the Minister

1741 Brunswick Street, PO Box 456, Halifax, Nova Scotia, Canada B3J 2R5
Telephone 902 424-4889 Fax 902 424-4872 • www.gov.ns.ca

DEC 10 2014

Mr. M. B. (Malcolm) Mackay
Trustees of the Presbyterian Church of Saint David
1537 Brunswick Street
Halifax, NS B3J 2G1

Dear Mr. Mackay:

I am writing to confirm that your application of May 13, 2014 to substantially alter the Presbyterian Church of Saint David, 1544 Grafton Street, Halifax, a registered provincial and municipal heritage property, has been reviewed as per the requirements of the *Heritage Property Act*.

On December 2, 2014, the Governor in Council determined that your application to substantially alter the Presbyterian Church of Saint David, 1544 Grafton Street, Halifax, be granted as recommended by the Advisory Council on Heritage Property, with the condition that the property owners comply with any minor design amendments required by Halifax Regional Municipality.

Meanwhile, should you have any questions, please contact Mr. Kevin Barrett, Coordinator, Heritage Property Program, directly at 902-424-6396 or kevin.barrett@novascotia.ca.

Sincerely,

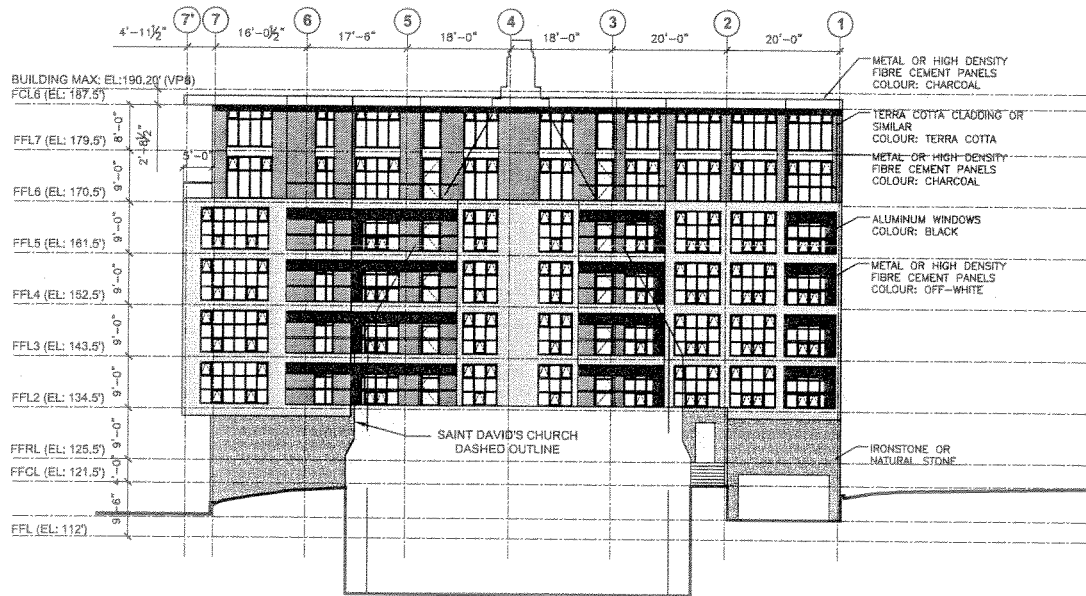
Original Signed by

A handwritten signature in black ink, appearing to read "Tony Ince".

Tony Ince
Minister

cc: Mr. Marcel P. McKeough, Executive Director, Culture and Heritage Development
Mr. Craig Beaton, Director of Programs
Mr. Kevin Barrett, Coordinator, Heritage Property Program
Ms. Maggie Holm, Heritage Planner, Halifax

Attachment C: Grafton Street Elevation

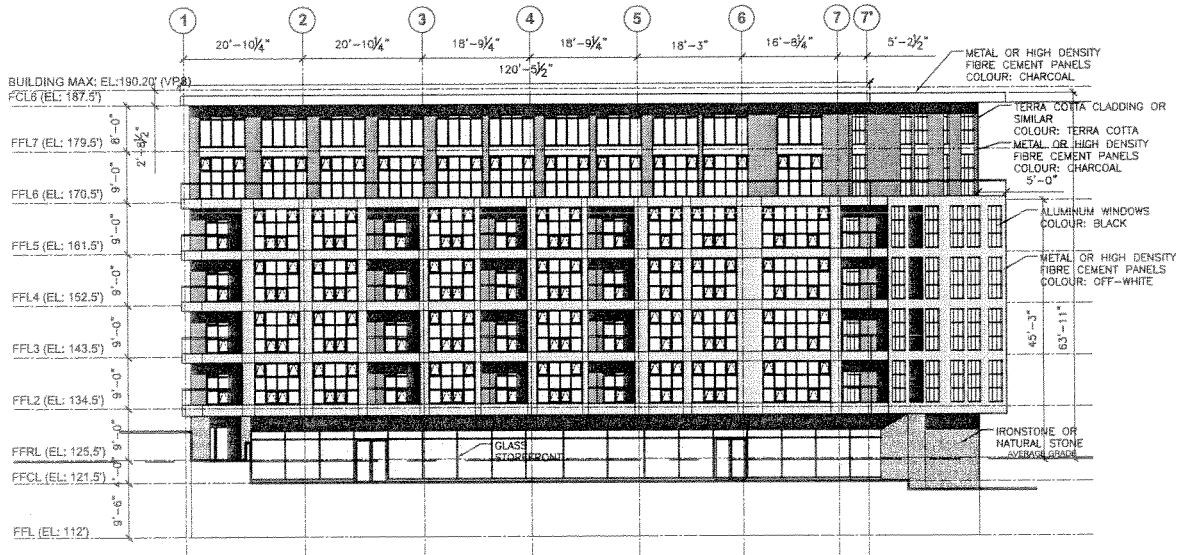


STUDIO WORKS
 ARCHITECTURE
 1537 BRUNSWICK ST. HALIFAX, N.S. B3A 2R4
 TEL: (902) 421-1111 FAX: (902) 421-1112
 WWW.STUDIOWORKS.NS.CA

Site: GREENWOOD LANE DEVELOPMENTS
 EAST ELEVATION
 Location: 1537 BRUNSWICK ST. HALIFAX, N.S.

Scale: 1/16"=1'-0"	Page No:
Date: 09/13/12	A13
Drawn: LG	
PHL: BRT201	CHK:

Attachment D: Brunswick Street Elevation



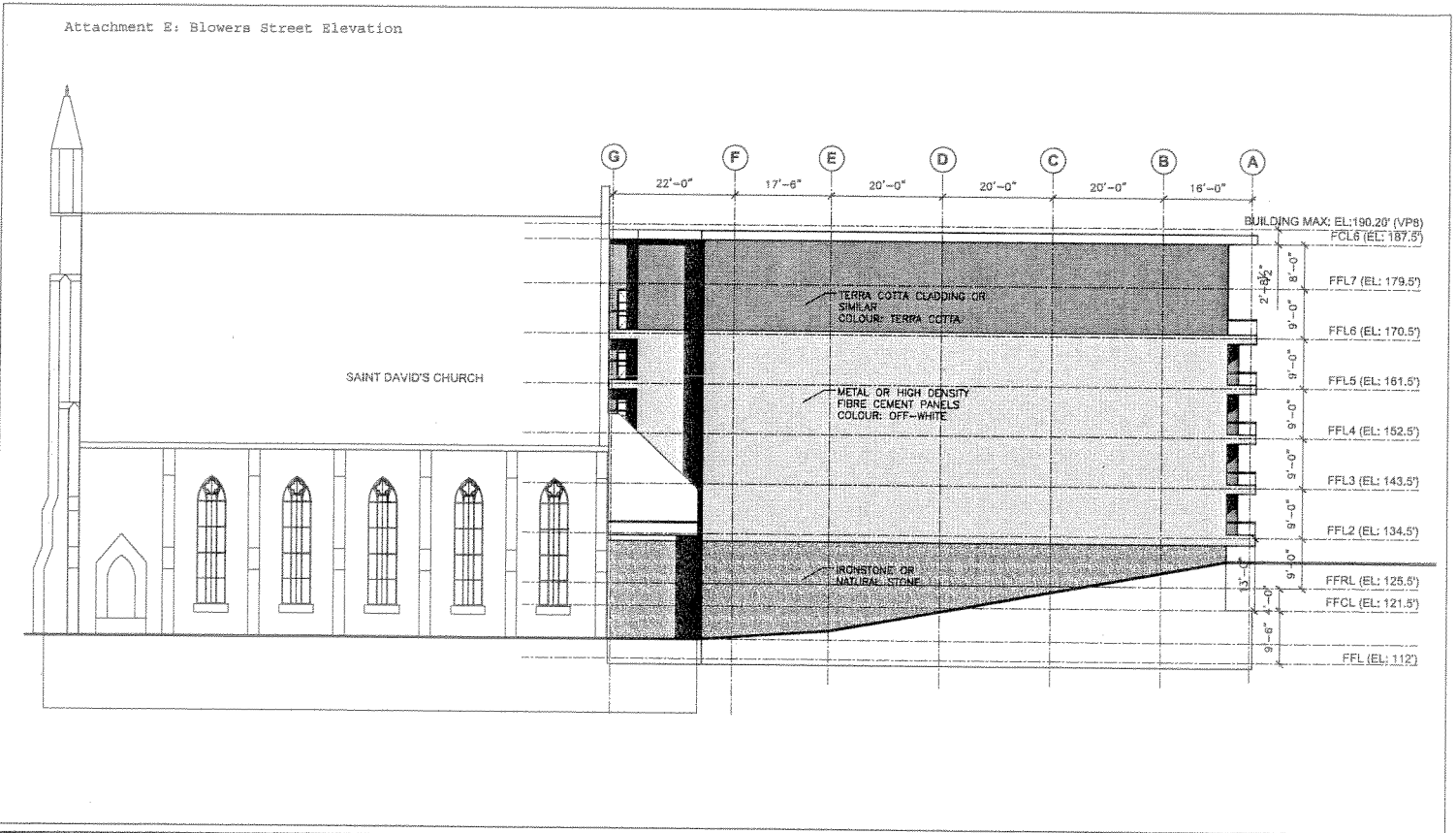
STUDIO WORKS
 INTERNATIONAL INC.
 1000 ...
 ...

site GREENWOOD LANE DEVELOPMENTS
 WEST ELEVATION (BRUNSWICK STREET)
 location 1537 BRUNSWICK ST, HALIFAX, N.S.

scale 1/16"=1'-0"
 date 09/12/12
 drawn LG
 pty: BR1201

sheet no: A11
 rev:

Attachment E: Blowers Street Elevation



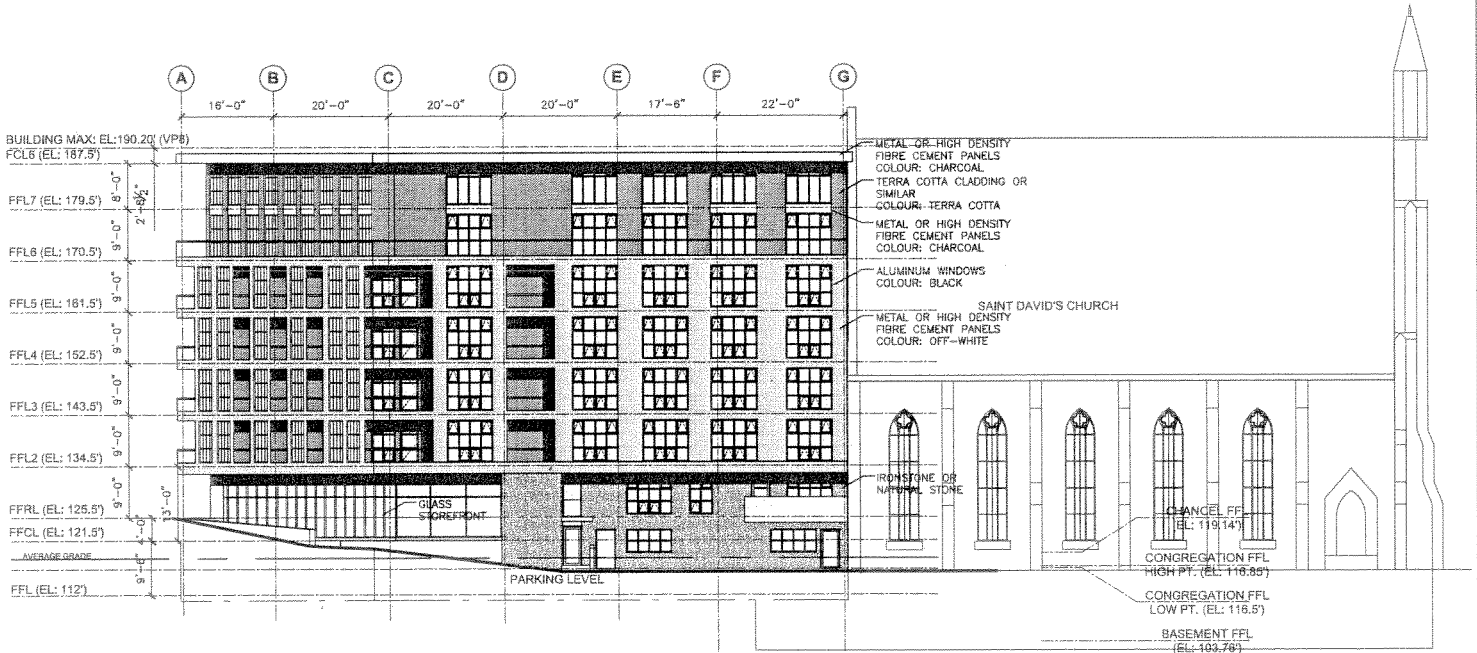
STUDIO WORKS
INTERNATIONAL INC.
1782 BRUNSWICK ST. HALIFAX, NS B3A 2R1
902-420-1111
www.studioworks.ca

site: GREENWOOD LANE DEVELOPMENTS
NORTH ELEVATION
location: 1537 BRUNSWICK ST. HALIFAX, N.S.

scale: 1/16"=1'-0"
date: 09/13/12
drawn: LG
proj: BR1201

dwg no: A14
rev:

Attachment P: Library Elevation



STUDIO WORKS
 ARCHITECTURAL
 1537 BRUNSWICK ST. HALIFAX, N.S.
 TEL: 902-421-1111
 WWW.STUDIOWORKS.NS.CA

PROJECT: GREENWOOD LANE DEVELOPMENTS
 SOUTH ELEVATION
 LOCATION: 1537 BRUNSWICK ST. HALIFAX, N.S.

SCALE: 1/16"=1'-0"	DATE: 09/13/12	DRWING NO: A12
DRAWN: LG		
PTG: BR1201		

Attachment G - Heritage Building Summary

St. David's Presbyterian Church – 1533 Grafton Street, Halifax (c. 1868-69)



Character Defining Elements:

- Prominent location on a slight rise on Grafton Street;
- Symmetrically arranged building on a rectangular footprint;
- Brick construction, with parged side and rear elevations;
- Front façade has a four angled buttresses with decorative sandstone pinnacles topping each buttress, and the central pinnacle decorated with crockets;
- Side and rear elevations have smaller buttresses;
- Steeply pitched roof with minimal roof overhang;
- Projecting sandstone entrance, with substantial wooden double doors, and a rose window with stained glass above;
- Gothic windows with decorative tracery and sandstone trims including chimeras and crocket capitals on the front elevation;
- Large, central gothic window high in the front elevation which includes a decorative rose window;
- Small cemetery on the south side of the building with original grave markers.

Heritage Value:

This Gothic styled church was designed by David Stirling and constructed by local mason George F. Blaiklock in 1868-69. Originally constructed as the Grafton Street Methodist Church, it replaced an earlier wooden Methodist church which was destroyed by fire in 1868. The site still contains a small cemetery, to the south of the church and under the church hall, known as the Methodist Burying Ground of Halifax (1793-1844).

In 1925, the Presbyterian Church of St. David was created when the United Church of Canada was created through the amalgamation of several denominations: the Presbyterians, Methodists and Congregationalists. However, several local members of the Presbyterian Church of Canada chose to remain true to the Presbyterian faith and established the Presbyterian Church Association in 1924. As a result of the church union the Grafton Street Methodist Church became redundant and became home to the Presbyterians in Halifax, who renamed their church the Presbyterian Church of Saint David.

Designed in the Gothic style, the Grafton Street Methodist Church is a unique example of this style constructed in brick in the province. St. David's Church is the older of Stirling's two surviving Halifax churches (Fort Massey, c.1870).

The Grafton Street Methodist Church is highlighted by its great front gable with tall Gothic buttresses and the decorative pinnacles which project above the roof line. Most notably, the church was built without a steeple. In 1951, the church hall was expanded to the rear, which replaced the original Sunday School and took up a section of the Methodist Burying Grounds. Additionally, it is believed that the Reverend William Black, the founder of the Methodism in Atlantic Canada, is buried beneath the Grafton Street Church.

Attachment H: Standards & Guidelines Evaluation

Conservation is the primary aim of the Standards and Guidelines, and is defined by the Standards & Guidelines as 'all actions or processes that are aimed at safeguarding the character-defining elements of an historic place so as to retain its heritage value and extend its physical life. This may involve **Preservation, Rehabilitation, Restoration**, or a combination of these actions or processes.'

Note: The Standards are structured to inform the type project or approach being taken.

- Preservation project apply Standards 1 through 9;
- Rehabilitation projects apply Standards 1 through 9, and Standards 10 through 12;
- Restoration projects apply Standards 1 through 9, Standards 10 through 12, and Standards 13 and 14.

Similar to the Standards, the base Guidelines apply to the approach being taken, and additional Guidelines may apply if the project includes rehabilitation and restoration. The Guidelines should be consulted only when the element to be intervened upon has been identified as a character defining element. The Guidelines should not be used in isolation. There may be heritage value in the relationships between cultural landscapes, archaeological sites, buildings, or engineering works. These values should not be compromised when undertaking a project on individual character defining elements of an historic place.

PRIMARY TREATMENT: PRESERVATION			
<i>Preservation is the action or process of protecting, maintaining, and/or stabilizing the existing materials, form, and integrity of an historic place, or of an individual component, while protecting the heritage value.</i>			
STANDARDS 1-10	Complies	N/A	Discussion
1. Conserve the <i>heritage value</i> of an <i>historic place</i> . Do not remove, replace or substantially alter its intact or repairable <i>character-defining elements</i> . Do not move a part of an historic place if its current location is a character-defining element.			Guideline 4.2 (Archaeological Sites) does not recommend disturbing the context of an archaeological site which includes a cemetery. However, the archaeological mitigation of the cemetery at St. David's Church is being undertaken with the necessary Provincial Heritage Research Permits in accordance with the Cemeteries and Monuments Protection Act. The work is being undertaken and monitored by qualified archaeologists.
2. Conserve changes to historic places that, over time, have become <i>character-defining elements</i> in their own right.		N/A	
3. Conserve <i>heritage value</i> by adopting an approach calling for <i>minimal intervention</i> .			Minimal intervention, taking a rehabilitation approach to the site, refers to limiting the proposed new use, addition or changes. Given the limitations of the site, and the location of the burials this was not possible. However, the Church is being conserved in its entirety.
4. Recognize each <i>historic place</i> as a physical record of its time, place and use. Do not create a false sense of historical development by adding elements from other historic places or other properties, or by combining features of the property that never coexisted.	X		

5. Find a use for an <i>historic place</i> that requires minimal or no change to its <i>character-defining elements</i> .	✓		
6. Protect and, if necessary, stabilize an <i>historic place</i> until any subsequent <i>intervention</i> is undertaken. Protect and preserve archaeological resources in place. Where there is potential for disturbing archaeological resources, take mitigation measures to limit damage and loss of information.			The archaeological mitigation of the cemetery at St. David's Church is being undertaken with the necessary Provincial Heritage Research Permits in accordance with the Cemeteries and Monuments Protection Act. The work is being undertaken and monitored by qualified archaeologists.
7. Evaluate the existing condition of <i>character-defining elements</i> to determine the appropriate <i>intervention</i> needed. Use the gentlest means possible for any intervention. Respect <i>heritage value</i> when undertaking an intervention.	✓		
8. Maintain <i>character-defining elements</i> on an ongoing basis. Repair character-defining elements by reinforcing their materials using recognized conservation methods. Replace in kind any extensively deteriorated or missing parts of character-defining elements, where there are surviving <i>prototypes</i> .		✓	
9. Make any <i>intervention</i> needed to preserve <i>character-defining elements</i> physically and visually compatible with the <i>historic place</i> and identifiable on close inspection. Document interventions for future reference.		✓	

PRIMARY TREATMENT: REHABILITATION

Rehabilitation is the action or process of making possible a continuing or compatible contemporary use of an historic place, or an individual component, while protecting its heritage value.

STANDARDS 10-12	Complies	N/A	Discussion
10. Repair rather than replace <i>character-defining elements</i> . Where character-defining elements are too severely deteriorated to repair, and where sufficient physical evidence exists, replace them with new elements that match the forms, materials and detailing of sound versions of the same elements. Where there is insufficient physical evidence, make the form, material and detailing of the new elements compatible with the character of the <i>historic place</i> .		N/A	
11. Conserve <i>heritage values</i> and <i>character-defining elements</i> when creating new additions to an <i>historic place</i> or any related new construction. Make new work physically and visually compatible with, subordinate to and distinguishable from the historic place.	✓		
12. Create any new additions or related new construction so that the essential form and integrity of an <i>historic place</i> will not be impaired if the new work is removed in the future.	✓		