



THE CALGARY HERITAGE INITIATIVE GIVES CONSENT TO THE CITY OF CALGARY TO PUBLIC DISTRIBUTION OF THIS LETTER AND ATTACHMENTS BY ANY METHOD.

March 19th, 2020

Re: April 1, 2020 City of Calgary SPC on Policy and Urban Development
Heritage Conservation Tools and Financial Incentives Report

Comments Refer to THE 10 Page Summary Report “Heritage Conservation Policy Tools and Financial Incentives Report – April 2020.” <https://www.calgary.ca/PDA/pd/Documents/Heritage-Planning/Summary-of-Proposed-Heritage-Conservation-Recommendations.pdf>

Dear Members of PUD

The Calgary Heritage Initiative, known as CHI, is a volunteer society dedicated to the preservation, productive use, and interpretation of buildings and sites of historic and architectural interest in our city. Heritage communities contribute to the economic and environmental sustainability of our city and the social wellbeing of our citizens. They create a sense of place.

Over the past couple of years, CHI actively participated as a heritage stakeholder in the Guidebook for Great Communities and related Heritage Conservation Tools and Incentives Report engagement processes. When the heritage content was pulled from the Guidebook last August, to be addressed in a separate report, stakeholders like CHI were not given an opportunity to comment on the implications. During this time, we have witnessed continued and pending demolition of recognized heritage buildings, and the erosion of streetscapes and mature landscaping, that all contribute to defining community character. This was not the intent of Imagine Calgary or Plan-It. We are now facing an unprecedented public health and economic crisis with great uncertainty. Its time to take a pause until Council’s and the public’s attention can reasonably refocus on long term planning.

At the time of writing, we are assuming that the Heritage Conservation Tools and Financial Incentives Report (Heritage Report) will be heard at PUD on April 1. This letter outlines CHI’s comments on timing issues as well as the draft heritage report. CHI’s address to the March 4th PUD hearing on the Guidebook and North Hill Communities Plan is Attached (A) for reference.

1. Timing of approval of the Heritage Conservation Tools and Financial Incentives Report, Guidebook for Great Communities and North Hill Communities Local Area Plan (April 27, 2020)

In light of the current public health and economic crisis CHI is calling for PUD to recommend a revision to the timing of approval of these items. Arguments about adhering to advertising commitments or Council directed reporting dates should be set aside in these circumstances. These three policy documents go hand in glove and sequencing/timing must be considered together. Forcing them through in April, when the City itself has declared a state of emergency does not serve the interests of Calgarians.

a. Public Hearings on the Heritage Report should be postponed until the current lock down is over, then recommend the Heritage Report for approval report as soon as possible to allow for proper public hearings.

Council, public and media attention is elsewhere right now. There has been no open public engagement on the proposed heritage tools and incentives. The initial workshops, when heritage was included in the Guidebook, were limited to daytime meetings of the stakeholder group. Because heritage was pulled from the Guidebook in August, it was not included in any of the subsequent public engagement on the Guidebook – like the FCC sessions, library kiosk, Home and Garden Show, etc.

The two subsequent info sessions on heritage tools and incentives (Oct 2019 and Jan 2020) were limited to a select group of invited stakeholders – in fact we were told that only one person per stakeholder group could attend. An updated slide deck from the January 29th info session was promised but only an “advance copy, not for distribution”, was provided by administration on Feb 12 when CHI requested it. It has been challenging for volunteer organizations like CHI, the CAs and others to send consistent representation to these meetings on weekday mornings and to communicate effectively to our members. While this approach may have been appropriate for the early stage of development of the heritage report; the sessions were billed as “info sessions/updates” and were not full public “engagement”. Individual stakeholder groups like CHI have been trying their best to communicate to their members. Heritage tools and incentives, the Guidebook, LAPS, LUB revisions to come, Main Streets, Established Area Growth and Change Strategy are all interrelated and hugely complex to communicate.

CHI had lined up Alastair Pollock to speak at our AGM at an open meeting in partnership with the Cliff Bungalow-Mission Community Association on Ap 15th; this has now been cancelled due to covid. We were anticipating 100 in attendance. There has been virtually no media pick up on the heritage report and this is surely at the bottom of media priorities right now. CHI had intended to participate in face to face pre-meetings with the select Councillors prior to PUD on April 1st. This attempt has been called off for now.

Open and accessible public comment is important – but we are obviously distracted. We are not on board with “Council business as usual” with call-in accommodation in place of real public hearings. Some of the unique benefits of in-person public hearings are listening to what everyone else is saying, chatting with them during breaks, engaging through body language and eye contact with the decision makers, using illustrations and distributing written copies to the audience.

CHI recognizes that Council direction is being sought for the approaches in the Heritage Report only and is not, at this time, being asked to approve statutory heritage policy. Therefore while our preference is to delay until a proper in-person public hearing could be held, if members of the stakeholder group who

have been engaged thus far in the development of this report are in agreement, CHI would support a call-in approach to the public hearing. This assumes a protracted state of emergency with social distancing mandates in place for some time. If the Heritage Report receives Council endorsement this approach would allow for Heritage Planning to continue their work on the tools and incentives for insertion into the statutory Guidebook and LAP.

b. Recommend delaying the public hearing of Council (April 27) on the approvals of the Guidebook and North Hill Communities Plan (and any other LAPS underway) until the heritage tools and incentives policies have been completed and inserted into the placeholders. Then hold a proper public hearing on these completed statutory policy documents so that reasoned input and decisions can be made, considering the balance of densification objectives with respect for community heritage character.

Administration is seeking direction from Council on the recommendations in the Heritage report so that they can continue their work on developing the tools, incentives and policies to a point where they can be inserted into the Guidebook and LAP placeholders. This is projected to take a year. A pause in approval of the Guidebook and LAPs will allow this work to occur.

In the meantime, administration has breathing room to work on the following as we are heading for a further slow down/recession and development pressures ease:

- Modification of the population growth projections assumed in the MDP. The letter and presentation from the Community Associations of Developed Calgary (Mar 4 PUD on the Guidebook) put it very well – “why are we doing this?”, referring to blanket densification policies. The numbers referred to in the letter show that existing land use would allow for most of the inner city/established areas density requirements to meet the 50% goal without modifying population projections. Given the reality of the dire economic climate, cancelation of major oil and gas infrastructure projects, and availability of downtown office space that could be repurposed for residential, the expectations for population growth and absorption of density in existing residential areas should be scaled back.
- Other revisions to the MDP and CTP.
- Clarifying where the LUB review is headed with consolidating R1, R2 and row type housing land uses with transparency around implications for the Guidebook and Heritage policy areas.
- Completion of the Established Areas Growth and Change Policy that addresses density bonusing/transfer
- Referencing parking and climate change implications in the Guidebook
- Renaming “The Heritage Communities Local Growth Planning project” that includes the communities of Eagle Ridge, Kelvin Grove, Kingsland, Fairview, Haysboro, Acadia, Southwood, Willow Park, Maple Ridge and Chinook Park. The current name is confusing and implies that these are heritage communities, which they are not.

There is a risk that speculative developers might start picking up properties for land assemblies then demolishing or neglecting properties because of the economic climate. They may do this on the strength of an approved Guidebook but without the Heritage Tools/Incentives and LAPs completed. This is a key reason why these statutory documents should be delayed until the heritage tools and incentives policies are completed.

Remember this whole process is supposed to provide clarity to the planning process and help streamline development approvals. Heritage and land use policies are very uncertain at this time.

2. Comments on the Heritage Conservation Tools and Financial Incentives Report

a. What CHI supports

- The general direction and content of the Heritage Report.
- The approach to layering policy for heritage areas, provided that all three layers are approved because they work together. Layer 2 requires clarity: “guidelines would not preclude row-house, multi family, or other innovative development where compatibly designed.” Other general heritage policy in the Guidebook directs against “mimicking”. An explanation of what is meant by “compatibly designed” is required.
- The general approach to tax-based incentives. Reference the success of the US program as a concrete example. Based on this <https://www.nps.gov/orgs/1207/htc2017.htm> the US program generated \$6.2 billion in GDP and 107,000 jobs in 2017, and over the past 40 years has enabled the preservation and rehabilitation of more than 43,000 historic properties, while generating more than \$144 billion in private investment.
- Financial incentives that may encourage homeowners to designate their heritage asset rather than demolish. Clarification is needed re the tax back grant maximum \$50000/15 years = \$3300 per year or can be based on assessed value?
- The restoration tax credit will encourage maintenance of heritage assets, although the designation bylaw itself may require refreshing from time to time.
- Additional and increased/year funding support to Heritage Calgary and the heritage planning budget. This is essential to implement the tools and incentives and to add to the inventory. Ideally, CHI would like to see dedicated, one-time funding to completing the inventory, given the recent work on identifying properties through the windshield survey and the backlog of properties previously identified for evaluation. It is acknowledged that as the city continues to age the inventory will need updating time to time.
- Clear definitions of Heritage areas, assets and resources. These terms are used in the Heritage Report and referenced in the glossary of the March 2020 proposed Guidebook for Great Communities. The terms acknowledge that heritage includes designated, inventoried and other heritage assets.

b. What should be Enhanced

Heritage Area Policy Tools

- While the street face approach to the three proposed layers is well defined and objective, implementation could result in a piecemeal approach with several mini-areas but no real cohesive heritage area over a contiguous cluster of residential blocks. Better area-based policy is desired, where heritage area bubbles, similar to those illustrated in the North Hill Communities LAP, could be identified for layer 1, 2 or 3. Policy tools and incentives could be based on the 25% or 50% presence of heritage resources and assets combined. These areas should encompass commercial and greenspace/streetscapes and parks and not just privately owned pre 1945 structures as per the “heritage asset” definition, although the percentage thresholds within the area could be based on the asset definition. Please see Attachment B for an illustrated example for layer 3.
- Include provision for developing a “Statement of Significance” for communities within a Local Area Plan that clearly and concisely describes the character and states the vision for each heritage policy area.
- Consider future application of this approach to Oil boom Era (1956-1956) and early Modern Era (1956-late 60s) neighbourhoods where distinctive mid-Century architecture and/or urban planning schemes are largely intact.
- Provide a map scheme, based on page 10 of the report, “Heritage Parcels: Designated, Inventory and Heritage Assets Calgary, Inner City” that illustrates where layers 1, 2 and 3 could apply.

Financial Incentives

- Generally, CHI believes these new financial tools (tax back grant and tax credit programs) may be insufficient on their own to encourage designation and that an increase to the Historic Resource Conservation Grant Program is also required (not instead of the tax programs). These financial incentives are particularly needed to help protect standalone homes in landscapes that face upzoning outside of the heritage policy areas. The increases could be paid for out of heritage density bonusing/transfer payments that actually reflect the value of the increased density approved for new development. Clear direction for heritage density/transfer bonusing formulas (based on FAR, height etc) should be developed.

Other

- Regarding page 3 of the summary report (Project Alignment bullet 3), detail is lacking on effectiveness and enhancements of density/transfer programs.
- The summary report lacks sufficient detail about proposed bylaw relaxations (e.g. parking, laneway housing, secondary suites) that assist in protecting privately owned heritage. See page 4- layer 1.

c. Further Engagement

Page 2 of the summary report outlines engagement to date. Further open public engagement, including fully accessible public hearings, is suggested.

The Calgary Heritage Initiative greatly appreciates being included in the process and encourages PUD to fully support the suggestions and enhancements we have outlined in this letter.

Karen Paul

CHI Communications Director

On behalf of the Calgary Heritage Initiative Society

contact@calgaryheritage.org

Attachment A

CHI Address to PUD March 4, 2020 on the Guidebook for Great Communities 7.4

Members of the Standing Policy Committee on Planning and Urban Development

I am Karen Paul, representing the Calgary Heritage Initiative, known as CHI, a volunteer advocacy society. Heritage communities contribute to the economic and environmental sustainability of our city and the social wellbeing of our citizens. They create a sense of place.

Over the past couple of years, CHI actively participated as a heritage stakeholder in the Guidebook and related Heritage Conservation Tools and Incentives Report engagement processes. When the heritage content was pulled from the Guidebook last August, to be addressed in a separate report, stakeholders like CHI were not given an opportunity to comment on the implications. That said, some very good work is reflected in the Guidebook.

During this time, we have witnessed continued and pending demolition of recognized heritage buildings, and the erosion of streetscapes and mature landscaping, that all contribute to defining community character. This was not the intent of Imagine Calgary or Plan-It.

The Guidebook you are considering today lacks the teeth to protect heritage. At a minimum, it should provide clear, overarching policy around density bonusing or transfer, as well as for preserving heritage areas. Placeholders that require Council's yet-to-be-obtained support for regulating policy on undesignated properties and corresponding financial support for tools and incentives, may or may not be implemented in time for multi-community LAP preparation, if at all. The NorthHill Communities LAP, also before you today, is a case in point.

Roughly quoting from a recent CBC broadcast about Vancouver's Chinatown... "Development without preservation is just as bad as preservation without development"

The proposed system of residential building blocks to increase density is spelled out in the Guidebook; it effectively incentivizes the replacement of R-1 homes, including heritage homes, with higher density housing. That's the development side. But where are the corresponding regulations and incentives to preserve heritage, streetscapes, landscapes and community character?

The fact is that virtually all of Calgary's heritage character neighbourhoods are within the developed areas of the City – exactly where densification pressures are highest. The Heritage Planners can provide the stats – but we are talking about a very small and dwindling percentage of Calgary's total housing stock here – about 1% of our homes are a century or more old, compared to say Winnipeg, that has 9% and has already implemented heritage districts as a tool to direct what should stay and what can go.

That's the residential side – Main Streets, so important for defining heritage character, are excluded from the draft Heritage Report. So even with the heritage placeholders, The Guidebook does not address heritage conservation on Main Streets.

More needs to be done to compel developers, through consistent city-wide policy, to contribute monetarily to the retention of near-by heritage assets or provide for community benefit in exchange for more storeys and higher density. This is a missed opportunity. To date bonusing requirements have been rather ad hoc or voluntary.

The wording related to Heritage (p103) in the Guidebook is very weak - "encourage/discourage and investigate" is not really policy wording. Policy that is written as a "suggestion" may translate into policy that is ignored. The Heritage Area Tools placeholder on pg. 118 is a big unknown in terms of scope and strength of language.

A policy from the DAG that acknowledged that the heritage value and resources of an area include but are not limited to, properties currently listed on the Inventory, was deleted from the Guidebook. This would have captured resources identified through the windshield survey, Main Streets and ARP revisions. Further, certain policies that address design, setbacks, massing, street wall and landscaping only apply to those sites that abut a property on the inventory. What about the rest of the heritage resources, some of which have been researched and submitted by CHI to Heritage Calgary for evaluation.

Now we seem to be stumbling over timing of the Guidebook, the Heritage Report and pending LAPS that are supposed to be informed by the Guidebook. This is backwards. The fact is that if any LAPS proceed without clear heritage policy, there will be no backtracking. Upzoning will have effectively occurred without counter-balancing modifiers to retain worthy heritage through regulation and incentives.

At the last Heritage Conservation Tools and Incentives update meeting on Jan 29, Councillor Carra said that it will be very important to bridge the Guidebook with the Heritage Report. CHI does not believe the placeholder approach is an effective bridge and provides no certainty.

So Chi is here to ask how PUD can reasonably recommend to Council that the guidebook with heritage placeholders be adopted without understanding what those placeholders will contain. How can PUD reasonably evaluate whether this Guidebook will achieve the dual objectives of densification and, in quotes, "respecting and enhancing neighbourhood character" as embedded in the MDP?

CHI asks that at a minimum, PUD's decision to recommend adoption of the Guidebook and the NorthHills LAP be deferred until the April 1st PUD meeting when the Heritage Conservation Tools and Incentives report will be presented. CHI asks that PUD's recommendation to Council on April 27 be a joint recommendation that amalgamates defined heritage policy into the Guidebook and LAP placeholders.

Thank you

CHI Address to PUD March 4, 2020 on the North Hill Communities LAP 7.5

Members of the Standing Policy Committee on Planning and Urban Development

I am Rick Williams, representing the Calgary Heritage Initiative, known as CHI, a volunteer, society dedicated to the preservation, productive use, and interpretation of buildings and sites of historic and architectural interest in our city.

The NorthHill Communities plan should not be recommended for Council approval by PUD until it's known what heritage tools and incentives will be adopted by the City. Residents and stakeholders need to evaluate whether they think the tools will be effective enough to retain heritage – and whether the incentives will be enough to offset all of the extra density being ascribed to the area. Otherwise we have a LAP that has supportive policy of upzoning but with no or insufficient tools to offset the density for heritage sites.

The NorthHill Communities plan does not contain provision for implementing heritage density bonusing or transfer. It's a missed opportunity, like giving away density for free, which we know has immense value. It leaves money on the table that could be used for community benefit such as heritage grants or program funding , or to enable a density transfer program for houses, as could have been done for buildings like the Tiegerstadt Block, Hicks Block and others. The modest grants available now and measures like property tax relieve help but are just not enough to really impact heritage retention and we know that City resources to provide community benefit are strained.

The NorthHill Communities LAP has identified some areas of high concentration of heritage sites in section 2.13 and Appendix C. This partially addresses the timing challenge regarding lack of heritage area districting policy. However, there are many resources outside the boundary/ concentration in NorthHills that will be under policy supportive of town houses and row house development. Funds are going to be needed to encourage their owners to retain homes and influence the retention of other heritage resources. Bonusing could supply those funds and give owners of heritage building opportunity to recoup economic value rather than redevelop by allowing them to sell their density.

Thank you

Attachment B

Illustrated Example of Additional Options for Heritage Area Policy, Layer 3

Related to layer 3 an enhanced formula to be adopted at the option of the communities through the LAP process, might be '50% of contiguous properties' (contiguous including being across streets, alleys, and parks), as per the heritage bubble idea. For example in the photo below, if the green area were all heritage assets, none would qualify for layer 3 due to all being maybe 40-45% of block faces.



Or in another example, using the block face criteria only the middle block face would be layer 3 in a scenario where all of the green were heritage assets:





Public Submission

City Clerk's Office

Please use this form to send your comments relating to matters, or other Council and Committee matters, to the City Clerk's Office. In accordance with sections 43 through 45 of Procedure Bylaw 35M2017, as amended. The information provided may be included in written record for Council and Council Committee meetings which are publicly available through www.calgary.ca/ph. Comments that are disrespectful or do not contain required information may not be included.

FREEDOM OF INFORMATION AND PROTECTION OF PRIVACY ACT

Personal information provided in submissions relating to Matters before Council or Council Committees is collected under the authority of Bylaw 35M2017 and Section 33(c) of the Freedom of Information and Protection of Privacy (FOIP) Act of Alberta, and/or the Municipal Government Act (MGA) Section 636, for the purpose of receiving public participation in municipal decision-making. Your name, contact information and comments will be made publicly available in the Council Agenda. If you have questions regarding the collection and use of your personal information, please contact City Clerk's Legislative Coordinator at 403-268-5861, or City Clerk's Office, 700 Macleod Trail S.E., P.O. Box 2100, Postal Station 'M' 8007, Calgary, Alberta, T2P 2M5.

* I have read and understand that my name, contact information and comments will be made publicly available in the Council Agenda.

* First name	Ali
* Last name	McMillan
Email	planning@brcacalgary.org
Phone	5872270607
* Subject	Heritage Conservation Tools and Incentives
* Comments - please refrain from providing personal information in this field (maximum 2500 characters)	We strongly support the City's Report on Heritage Conservation Tools and Incentives. As one of Calgary's oldest communities we see high value in the tools being proposed and urge Council to support the recommendations in this report. We would like to see these tools embedded in the Guidebook for Great Communities or applied City-wide as soon as possible so we can start using it.



SCARBORO COMMUNITY ASSOCIATION
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Calgary, AB T3C 0W8

March 23, 2020

Standing Policy Committee on Planning & Urban Development
Office of the Councillors
700 Macleod Trail SE,
Calgary, AB T2G 2M3

RE: Heritage Policy Tools & Financial Incentives Report

Dear Madam Chair & Members of the Standing Policy Committee for Planning and Urban Development,

The neighbourhood of Scarboro is a designed district from 1909-10. At the turn of the century, CP Rail's land commissioner worked with **the Olmsted firm**: a renowned landscape architecture firm known for its design of Central Park in New York City, the US Capitol Grounds and Niagara Falls. **Scarboro is ONE of three fully executed Olmsted residential parklands in Canada.** Preservation of Olmsted designs in Canada began in 2018 with the **federal designation of Uplands in Victoria, BC.** Now, Scarboro seeks protections to help celebrate Calgary's history and to support its future growth.

We commend the direction to consider heritage area policies and protections in Calgary. However, the **Heritage Area policy required to protect the historic integrity of Scarboro is NOT included in the report** being considered. The Scarboro Planning Committee requests Councillors to direct Administration to consider protections for **BOTH cultural landscapes and privately owned assets** in Heritage Areas that meet the following criteria:

- **A Heritage Area** unified by a common theme or design principle is eligible for designation.
- A Heritage Area assessed on the basis of **a collection of historic buildings and/or landscapes** that may not qualify for designation as individual historic resources. Heritage significance is attributed to a geographic concentration of historic sites.
- The presence of **25% historic sites in an AREA including parks, streetscapes & buildings** will make it eligible for guidelines that affect **discretionary uses of private property**. The presence of **landscapes** that lend historic significance to the area **will be eligible for designation**. A Master Landscape Plan will be created with The City of Calgary for the Heritage Area in relation to these public spaces.
- The presence of **50% of historic sites in an AREA including parks, streetscapes & buildings** will make it eligible to be regulated as a **direct control district**. The presence of **landscapes** that lend historic significance to the area **will be eligible for designation**. A Master Landscape Plan will be created with The City of Calgary for the Heritage Area as this relates to public spaces.



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The example of Scarborough calls for a policy that regulates **areas** including **both private and public lands** that span parks, streetscapes, and properties united by a particular design or theme, which represent a unique achievement in the history of Calgary.

Scarboro's **public green spaces** are integral to John Charles Olmsted's design, and to the future designation of Scarborough as a **Provincial Heritage Area**. The escarpment on the hilltop of Scarborough defines its natural borders. Original lot lines drawn on the topographic map show the design for a residential suburb that remains sensitive to context, **protecting and enhancing natural scenery**. Curvilinear streets carve triangular parklets throughout the neighbourhood. The proximity of the Bow River also lends significance to Scarborough. **The Bow River drew nomadic peoples to its water's edge:** people who followed the migratory patterns of the buffalo. Writings from the turn of the century document **the presence of migratory encampments in Scarborough during the summer months, when indigenous peoples came to collect treaty money**.

In the beginning of the 1910s, City Council had absolute confidence in Calgary's future as a western metropolis: "**Park development was seen as integral to the city's success**, not optional."¹ During **William Reader's** tenure as Parks Superintendent, **he worked in Scarborough from 1913 to 1942**, to oversee the construction of **playgrounds**, plan **boulevards** and **recommend species of trees, perennials and shrubs** on streetscapes and in parks. **Over 1,000 trees** lie on Scarborough public lands today, with an **estimated value of \$4,566,093** in 2020. This evaluation is based on data collected by Urban Forest Management to calculate estimated replacement cost. Individual mature trees or "**heritage trees**" (**predating 1945**) are very valuable. Within Scarborough, an American Elm carries a value of approximately \$61,000, a Northwest Poplar \$52,000, a Paper Birch \$40,000, and a Manitoba Maple is valued at \$37,000. This Olmsted residential parkland was designed to be **a natural retreat from the metropolis for all Calgarians to enjoy**. Triangle Park (popular for families & dogs) and the island on Shelbourne Street (a perennial garden maintained by residents), have led to numerous community events. These parks are amongst the **18 sites appearing on Calgary's historic inventory of resources**, along with **three heritage streetscapes**.

Following Dr. Nancy Pollock-Ellwand's recommendations (foremost expert of Olmsted designs in Canada), the Scarborough Planning Committee will be seeking to apply for **federal designation** of Scarborough at the same time as it seeks **municipal and provincial protections**. A **provincial designation** can be used to effectively establish **area boundaries** in relation to Alberta's heritage values and the neighbourhood's character-defining elements. The next step would be to use **municipal heritage area policies** (not yet approved), which could help **regulate parks, streetscape and neighbourhood character**. Many residences in Scarborough display original vernacular design and detailing from the 1910s and 1920s, and more recent buildings are of sympathetic design. The George Anderson caveat (part of the 1911 contract of sale) remains intact on almost all land titles in Scarborough, so that development is limited to single-family homes with generous front setbacks.

¹ City of Calgary Parks Dept, *Calgary Celebrating 100 Years of Parks*, Calgary: City of Calgary, 2010: 37.



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Neighbourhoods that merit heritage designation are **cultural landscapes** comprised of **both natural and human-made resources**. Please consider this example of “heritage area” as one that can inform the protections needed for other **heritage areas** in Calgary that **include historic green spaces and streetscapes, as well as private property**.

If Councillors wish to protect areas like Scarborough, then Administration must be directed to consider **BOTH public and privately owned historic resources** in defining Heritage Areas. As itemized above, a heritage area defined by a common theme or design principle could be given appropriate protections on the basis of its **historic parks, streetscapes and buildings**. Sites such as streetscapes and parks are **ALREADY** included on the Inventory for Historic Resources. **These public spaces SHOULD BE included in the CRITERIA to assess the heritage value of an area**. In order to preserve the integrity of heritage areas, there is need to recognize both public and private realms.

Respectfully yours,

Tarra Drevet
Chair of Planning & Development
Scarboro Community Association

SCARBORO Community Statistics:

Number of Trees: **1,083**

Estimated Value of trees in this community: **\$4,566,093**

Number of Trees per square km: **2,387**



SCARBORO COMMUNITY ASSOCIATION

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March 23, 2020

The City of Calgary
P.O. Box 2100, Stn. M
Calgary, Alberta, T2P 2M5

Attention:
Councillor Woolley (Ward 8)
CC: Mayor Nenshi and all City Councillors

RE: POSTPONE Bylaws in Planning & Development; revisions to Municipal Development Plan (MDP)

Dear Councillor Woolley,

Despite all that is going on around us, there is a matter that requires immediate attention. We must **pause and extend the deadlines for new bylaws and MDP revisions** in planning and development.

In this time of overt panic and stress, as residents attempt to protect themselves from the spread of COVID-19, we find ourselves torn between commitments to the Community and commitments to our Families. This is due to the fact that Administration is stating that **Council Meetings will go ahead on their scheduled dates**, including: Guidebook for Great Communities (Council April 27, 2020) and North Hill Local Area Plan (Council April 27, 2020).¹ Furthermore, the **deadline for submitting comments** to the redlined version of the **Municipal Development Plan** is **April 12, 2020**. Changes to this statutory document, pivotal in the hierarchy of Municipal Legal Planning, make it incumbent for residents and Chairs of Planning Committees to provide feedback and give their attention to this matter.

In the midst of a PUBLIC HEALTH CRISIS, members of the Scarborough Community Association are focused on families and seniors. Our Community Association has cancelled its meetings and events. We have developed an action plan with volunteers to help take care of seniors and others in need. The last thing we need to be worrying about is **the Guidebook for Great Communities and the Municipal Development Plan**. We need to focus our energy on what requires our most urgent attention. These planning documents can wait.

The following events and changes to Municipal Planning are diverting our attention from the CRISIS at hand. Residents in our Community are being asked to submit **applications to be part of the Project Team** for local growth planning until **April 19**. The Local Area Plan is to be created using policies from the Guidebook for Great Communities. Hence, **residents are giving feedback on POLICIES** that will **guide future development in Scarborough**. (A survey with residents was recently completed.) **Many residents wish to engage in a Public Hearing about these policies**. Last week, almost 20 Community Associations held an online conference **regarding the Guidebook**. This evening, another online

¹ Cf. <https://mailchi.mp/newsletters/planning-development-dispatch-september-1455009?e=14ad728394>



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conference will be held for Community Associations in the **Area 2 Local Area Plan**. We have yet to **conduct a thorough reading of the proposed changes to the Municipal Development Plan**, followed by **writing letters to experts in municipal legal planning** (for advice and commentary), followed by **writing letters to our Councillor and all Councillors** about our reticence to consider such changes at this time.

The intent to go ahead with “**online**” Public Hearings falls short of **our Public Participation policy**. The technology used to host such a meeting would only be capable of handling **a certain number of dial-ins**. Callers would be asked to hang up following their presentations. Remote access lines could have people hanging up in frustration. Furthermore, the public participation leading up to an approval of new bylaws has been truncated by COVID-19. Meetings previously scheduled with Councillors have been **cancelled**. Sessions organized by the Federation of Calgary Communities have been **cancelled**. Councillors would be going into a Council meeting on April 27 to make new bylaws **without listening to the public beforehand**.

We beseech you to hit the **PAUSE** button on **all Public Hearings, consideration of new Bylaws and amendments to the Municipal Development Plan** in the coming months, as our public’s attention **MUST** turn to their families and loved ones.

Thank you for your consideration.

With all due respect,

A handwritten signature in black ink that reads "Tarra Drevet". The signature is fluid and cursive, with a large loop at the end of the last name.

Tarra Drevet
Chair of Planning
Scarboro Community Association