

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

March 31, 2020

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

Dear Members of PUD

The Calgary Heritage Initiative (CHI) provides supplemental comments to our letter of March 19, 2020, appended to the Agenda package for the April 1, PUD meeting. These comments are based on a review of the 14 attachments posted on March 27<sup>th</sup> and on a conference call, facilitated by the Heritage Planning team, that members of CHI and other stakeholders participated in on March 30<sup>th</sup>.

The timing issues related to the current uncertainty around Covid, as outlined in our March 19 letter, have largely been addressed. CHI maintains that proceeding with Heritage Policy Areas in 2020 is critical prior to Council approval of the now postponed Guidebook for Great Communities, North Hill Communities LAP and other LAPs now underway. Administration now has some breathing room to continue work on developing the tools and incentives, as well as advancing other policy initiatives, such as the MDP/CTP and LUB reviews and the Established Area Growth and Change Policy (re p 3 of CHI's March 19<sup>th</sup> letter).

Reluctantly, CHI acknowledges that delaying funding for essential financial tools, to be considered in the 2023-26 budget cycle, reflects current economic uncertainties. Nevertheless, Council must recognize the considerable risks to additional heritage loss through this delay. Developer land assemblies and demolition may accelerate as the economy starts to rebound and developers push to get ahead of new heritage conservation policy. Any mid-cycle budget adjustment to increase to the Historic Resource Conservation Grant Program and funding for Heritage Calgary to accelerate updates and new evaluations, would be desirable.

CHI strongly supports the adoption of all the heritage area policy Recommendations (and not the Alternatives), for Incentive, Discretionary and Direct Control (DC) thresholds in order to achieve the best outcomes. In particular, the recommendation of the DC threshold of at least 50% should be adopted. The Alternative DC threshold of 75% severely limits protection of heritage assets through this mechanism to a few very select districts. (Attachment 7 Table 1: Distribution of Heritage Assets Across Thresholds and map attachment 5, pages 5 & 6). The Recommended Thresholds provide the opportunity for more of Calgary's historic communities to benefit from the establishment of Heritage Policy Areas. The Recommended Thresholds also provide maximum flexibility for communities, through the LAP

process, provided that heritage assets beyond primarily residential in defined Heritage Areas are included, such as abutting assets on Main Streets, institutional buildings and Cultural Landscapes.

CHI recognizes the considerable and valuable work that has gone into the Heritage Conservation Tools and Incentives Report and appreciates having had to the opportunity to participate, as stakeholders, in its development.

In closing, the economic benefits of heritage retention, jobs, tourism, competitive advantage and adaptive reuse, will be essential and impactful as we move towards economic recovery.

Karen Paul

CHI Communications Director

On behalf of the Calgary Heritage Initiative Society

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## 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.

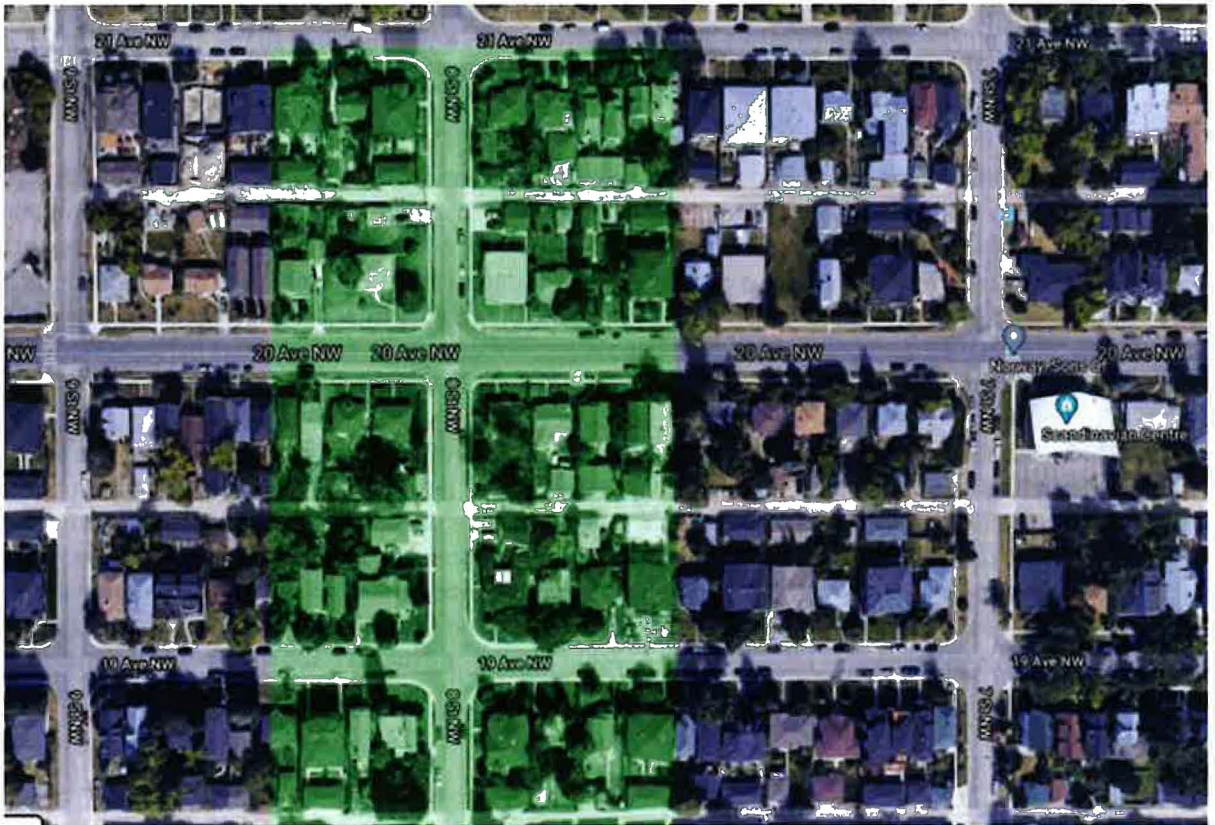
The NorthHill Communities LAP has identified some areas of high concentration of heritage sites in section 2.13 and Appendix C. This partially addresses the timing challenge regarding lack of heritage area districting policy. However, there are many resources outside the boundary/ concentration in NorthHills 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:

