



April 3, 2019

Via email [cpc@calgary.ca](mailto:cpc@calgary.ca)

Re: LOC 2018-0188, CPC April 4, 2019

Dear Members of the Calgary Planning Commission

I am writing on behalf of the Calgary Heritage Initiative Society regarding LOC 2018-0188 and the potential loss of character buildings along the 800 block of 17th Ave SW. Similar comments were submitted by CHI to the file manger in December 2018, however, we understand that only comments from the Community Associations and surrounding residents are presented in Administration's report to CPC on this matter.

Our objective at CHI, as a city-wide, citizen advocacy group, is to create awareness about the value of built heritage and to work towards supporting policy change at all levels of government to protect these resources. Please visit our web site, [www.calgaryheritage.org](http://www.calgaryheritage.org). Our "Posts" section includes posts about the history of 17th Ave SW and redevelopment plans for the avenue. Our Watch List provides fact sheets about some of the sites that we are keeping an eye on – including the 800 Block of 17th Ave SW.

CHI feels that when an application for redevelopment involves the loss of "character" buildings not yet evaluated for the City's Inventory of Historic Resources, that the independent evaluation of these resources be accelerated. The loss of undesigned character and inventoried buildings should be highlighted in City communications about the application and options for mitigating the loss, when the loss is inevitable, should be fully explored. These options may include heritage density transfer, commemoration, requirement to incorporate elements of the original building(s) in the new design, and so forth.

The 800 Block is a rare, remaining example of a residential historic streetscape on 17th Ave SW. It features the Spanish style Buon Giorno restaurant and modest wood frame homes, adjacent to the mixed-use commercial (Lang's Grocery) and single-story food retailers with angled corner frontage at 8th St SW. The block is across the avenue from Tomkins Park, established in 1915 on land donated by Henry & Elinor Tomkins. It is kitty-corner to the prominent Devinish Apartments, also constructed in 1911, a provincially and municipally protected heritage resource. The 1912 Anderson Apartments, also designated, are located to the rear and east of the development site at 804 18th Ave SW. These sites arguably form a heritage district on a highly visible corner (8th St and 17th Ave SW). The district is reminiscent of what was once the 17th Avenue High Street, with diverse housing, commercial and a public space.

I would like to draw your attention to two statements in the Developed Areas Guidebook that support the objective of community character retention in the Municipal Development Plan.

"a. Encourage the conservation of heritage buildings, including the incorporation of heritage buildings within new developments, to align with the Standards and Guidelines for the Conservation of Historic Places in Canada (2010).

b. Acknowledge that the heritage value and heritage resources of an area include, but are not limited to, properties currently listed on Calgary's Inventory of Evaluated Historic Resources (Inventory)."

We are pleased that Administration's report to the CPC about this application has identified the loss of these un-inventoried character buildings, particularly two of the century-old converted homes. While we continue to advocate for the retention of all four character buildings over demolition, we support the requirement that a "community benefit" be provided... "intended to offset the loss of the existing historic character homes on the site through a monetary contribution to the Heritage Incentive Reserve Fund. Administered through the Historic Resource Conservation Grant program, this fund offers assistance to property owners for restoration, preservation, and rehabilitation of historic properties. Any monetary contribution provided through this provision in the DC District would be earmarked to the community of Lower Mount Royal where it could be used to provide heritage grants to other historic buildings in the community. In total, the contribution would amount to \$228,000.00, or \$81.82 per square metre from 3.0 FAR to 5.0 FAR. The full contribution would be required for any FAR that exceeds 3.0. Based on analysis of historic buildings in Lower Mount Royal, this contribution would allow for grants to assist in the preservation of up to two historic houses in the community."

One area of concern with this application is the impact of shadowing on Tomkins Park, especially given that the Land Use application is for 27 metres (an increase from the currently approved maximum of 23 metres and a significant increase over the modest single-story profile of the exiting buildings). While there is provision to limit shadowing through the Lower Mt. Royal ARP and the Centre City Plan (under revision), we question whether these requirements (applying only to midday from March 21-September 21) will be sufficient to sustain the park and attract park users throughout the day. In this regard, we suggest that Calgary Parks, through the Detailed Team Review Process, conduct a thorough analysis of shading impacts on grass/plant growth, implications for future maintenance and citizen use and enjoyment of the park.

We are pleased to introduce CHI to you and look forward to continuing dialogue with the City about the loss of Calgary's heritage, evolving City policy, and ways that we may constructively influence the retention of community character (a noted City planning objective) through heritage retention. Over the past few months, we have been actively involved as stakeholders in recent City initiatives such as the City Centre Plan Refresh and the Developed Area Guidebook workshops. We are particularly enthused about discussions around heritage districts through the definition of Special Policy Areas in the DAG and encourage continuing policy work to protect Calgary's heritage and character buildings.

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