



## CALGARY HERITAGE INITIATIVE

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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 4<sup>th</sup> 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 29<sup>th</sup> 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 15<sup>th</sup>; 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](mailto: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:

