



RE Guidebook for Great Communities and North Hills Local Area Plan
PUD February 3, 2021: 6.1 PUD 2021-0015 & 6.2 PUD 2021-0030

To: Members of the Planning and Urban Development Committee
publicsubmissions@calgary.ca; Jyoti.Gondek@calgary.ca; ward.sutherland@calgary.ca;
evan.woolley@calgary.ca; gian-carlo.carra@calgary.ca; druh.farrell@calgary.ca; ray.jones@calgary.ca;
peter.demong@calgary.ca; themayor@calgary.ca;

cc. Joe.magliocca@calgary.ca; sean.chu@calgary.ca; George.Chahal@calgary.ca; Jeff.Davison@calgary.ca;
shane.keating@calgary.ca; diane.colley-urquhart@calgary.ca; Jeromy.farkas@calgary.ca;
Alastair.Pollock@calgary.ca; Erin.VanWijk@calgary.ca; Jeffry.Haggett@calgary.ca;
Robyn.Jamieson@calgary.ca; Matthias.Tita@calgary.ca; Joachim.Mueller@calgary.ca;
jtraptow@heritagecalgary.ca; Ian.Harper@calgary.ca; Lisa.Kahn@calgary.ca; Troy.Gonzalez@calgary.ca;
awalker@heritagecalgary.ca; stuart.dalgleish@calgary.ca

Heritage plays a vital role in achieving the goals of the Municipal Development Plan. We are pleased to see heritage area policy tools included in the Guidebook, and the provision to detail their implementation in residential areas in the North Hills Local Area Plan over the coming months. We also understand that work is being undertaken to make recommendations for heritage on commercial Main Streets.

We do not support the adoption of the North Hills Local Area Plan at this time. While community histories have been added, this does not carry through to the policies. This plan is still incomplete. Adopting this plan would set a dangerous precedent for adopting other incomplete LAPS. Our position voiced of last July holds – placeholders for heritage policy are insufficient.

We offer our cautiously optimistic support for the Guidebook, but qualify our support with the recommendations listed below.

We are also optimistic about Calgary's future and the relationship between conservation and the adaptive re-use of heritage assets with our city's growth strategy to become a more compact city. This can be done in correlation with meeting the sustainability and environmental goals advocated for by the majority of Calgarians. The benefits are:

Economic: the improvement of existing dwellings creates 40% more GDP in Canada than new construction and is proportionally a bigger job generator.

Environmental/Sustainability: the building sector generating up to 35% of Canada's greenhouse gases and 35% of landfill waste, and the Canadian Green Building Council recommends 'to avoid the worst effects of climate change...focus on sustainable rehabilitation and retrofitting'.

Social/Cultural: Historic communities are physical links to our past. They provide a sense of identity, continuity and belonging. They are places for all Calgarians to visit and enjoy.

This letter outlines five key areas of concern with the Guidebook and NHLAP, many of which can be addressed with minor modifications to wording (see attachment). Representatives from Calgary Heritage Initiative, Calgarians for Heritage Districts, Heritage Calgary and several communities met with Administration on January 27th to clarify a number of points and received their commitment that the specific items in the attachment will be responded to following the PUD hearing on Feb 3. We ask for your support for these changes.

The five areas of concern are listed below, each with specific recommendations:

1. How effective will these policies be in balancing growth and infill development with the enhancement of neighbourhood character and distinctiveness?

We struggle with understanding whether the collective policies proposed are sufficient to balance preservation vs redevelopment (possibly tear-down and infill development) in our most heritage-rich communities (Zone A). The language of the Principles and Goals for the Guidebook has diverged from the MDP, which included Goal 2.3 “Respecting and Enhancing Neighbourhood Character.” The Guidebook sets a tone to “create” instead of “enhance” great communities, as if we were working from a blank slate.

After extensive review, we still do not have a clear understanding of how the various policies, including the three layers of Heritage Area Policy tools, will work together with the Neighborhood Local urban form, The Heritage Resources Policies and the Limited Scale Policy. The Guidebook and NHLAP do not reference layer 3 tools, i.e. direct control districts for heritage areas. Nor have we seen how effective these tools will be when developed and implemented in the NHLAP. If we struggle, as advocates of heritage policy tools, so too will the general public unaware of the evolution of these documents over some 15 years. We recommend that clear examples be provided during the period leading up to the March 22nd City Council public hearing, building upon the work in PUD2020-0758, ATTACHMENT 4 of the Heritage Conservations Tools and Incentives Report “Testing of Heritage Areas Discretionary Guidelines Policy Tool”. These examples, as well as support for the improvements suggested in the specific wording changes in the attachment, will go a long way to remove the ambiguity with the current documents. We also recommend that criteria for low density in Neighbourhood local, be expanded to include the heritage guideline area. (see page 3 of the attachment).

2. How will community-specific, local character be reflected on residential streets?

The Guidebook and LAPS will replace “The Infill Guidelines” for established communities and specific local policies in the ARPs of many communities. One size does not fit all – what works for North Hill Communities on one side of 16th Ave may not “fit” with the character on the other. What (if any) community-based policies will apply to residential streets with <25% heritage assets? The NHLAP has done a good job of providing guidelines for redevelopment on Main Streets...how about residential streets? Please consider a motion to include policy that enables community specific policies for private and public green spaces, sidewalks, landscaping, scale and setbacks. Such policies would guide redevelopment and provide some assurance to residents that what makes their local character special is reflected in new infill development. While such policy may not protect heritage per se, it would protect streetscapes, and the “feel” of a neighbourhood.

3. How will Designation and Layer 3 Participation be Incentivized?

CONTEXT:

- *Only 2.5% of Calgary's total housing stock (all types) was constructed prior to 1946, and just 1% prior to 1921 (source: Stats Can 2016)*
- *88% of the housing stock constructed prior to 1921 (6555) is in good repair, requiring only regular maintenance or minor repairs. It's well worth preserving. (source: Stats Can 2016)*
- *4122 residential heritage assets were identified over 26 communities in 2019 (currently being verified)*
- *Just 303 buildings whose original use was residential are listed on the Inventory of Evaluated Historic Resources, 34 have already been demolished and just 34 have been designated to date.*
- *Designation is Calgary's strongest tool to protect heritage assets that support "identity and a sense of place".*
- *Incentives for designation are not yet available (e.g. tax rebate, full funding of the Heritage Resource Conservation Grant program) or defined e.g. (bonusing).*
- *Funding tools and investment strategies are being reviewed (GB p 111).*

Given the limited incentives now offered to Heritage homeowners (and not all will be interested or be able to take advantage of development opportunities on their parcel), and given that it is not clear how the policies in the guidebook work together with Layers 2 and 3 to regulate lot coverage and height, if at all, how do we incentivize designation and the uptake of Layer 3: The Direct Control district tool?

When the redevelopment policies in the Guidebook apply, especially to Zone A, redevelopment by up-zoning is encouraged, creating a financial incentive to demolish. This is certainly appropriate in those areas directed by the LAP process. However, these policies also threaten heritage. Strong disincentives to demolish in protected areas must exist (eg massing, scale, height and lot coverage) and incentives must be strong enough to encourage retention. Right now, we only have designation as the primary mechanism for citizens to receive incentives.

To date, the Character Home policy in the Bridgeland-Riverside Character home retention policy has attracted little interest, as the incentives simply can't compete with the economic gain from spot upzoning. Given that density bonussing is not being considered as a tool to somewhat level the playing field between development and retention, at least in the NHLAP, what assurance do we have that some of the 4100 Heritage Assets in Zone A will be compatible with the Guidebook policies? It is unknown how many of the 4100 assets would qualify for inclusion on the inventory. If eligible for inclusion, designation by the homeowner is the best protection and if a homeowner does not have assurance regarding redevelopment on the abutting and surrounding properties, they may choose not to designate. We are asking that Council direct Heritage Planning to complete the assessment of the heritage assets identified in the verified windshield survey, prepare a list of those eligible for consideration to be added to the inventory, and expand policy 3.8.g. to include these assets. We anticipate that full support for the recommended incentives (e.g. tax incentive, grants and bonusing tools) be forthcoming.

4. Repurposing & Re-use

Given the current economic climate, there could be a fundamental shift towards working from home post-pandemic. In which case, what happens to our downtown, empty commercial space, etc.? We need to make better use of existing infrastructure, minimize construction waste, reduce commuting and pollution. As per the 2019 City of Calgary document entitled 'Heritage Conservation - Overview and Benefit Summary': The re-use of existing buildings presents significant carbon savings over the total cost of replacing a city's entire building stock. Historic buildings are said to have "Inherent Sustainability" through their long life-cycle, reparability, and traditional building design (Building Resilience: Practical Guidelines for the Sustainable Rehabilitation of Buildings in Canada). In addition, the demolition of buildings in Canada generates approximately 35% of all landfill waste (Canada Green Building Council). Conserving and rehabilitating the historic fabric presents a significant opportunity to reduce unnecessary landfill usage and material loss. The Guidebook focus on creating density via new buildings appears to be dated. There needs to be a stronger policy to incentivize repurposing of both heritage and non-heritage buildings, thereby relieving some of the pressure on historic communities and directing redevelopment to the nodes and corridors (as per the MDP direction). Please see page 10-11 of the attachment for further suggestions as to how the NHLAP could be improved to encourage repurposing by identifying potential candidates in the plan.

5. Calgary does not (yet) have policy for integrated heritage districts

Heritage districting policies in many other cities in Canada encompass not only residential, but also commercial, institutional and industrial uses. While we recognize the limitations of the Alberta Historical Resources Act in this regard, we trust that the City's Heritage Planners will continue to work toward more inclusive heritage district policy. In the meantime, please support our suggestion to modify the wording that allows higher density "near or adjacent to main streets", delete near and add except where heritage policy areas apply...." (See pp.2-3 of the attachment). This would protect the integrity of potential heritage districts that have both residential and commercial assets of a similar scale, style or era.

In closing, as a stop gap measure, we ask for your support to apply this policy in the NHLAP : p. 48 2.12 "Heritage Guideline Areas 1. Land use redesignations for higher density development are discouraged until heritage policy tools have been developed I the plan area." To ALL areas identified with >25% heritage assets on a block face, as per the validated windshield survey results (apx 4000 heritage assets).

Heritage Belongs to Everyone!

Sincerely,

Karen Paul

[The Calgary Heritage Initiative Society](#) (CHI) advocates to preserve and promote the productive use of buildings and areas of historic significance. Established in 2006.

Lorna Cordeiro

[Calgarians for Heritage Districts](#) (CFHD) focuses on educating government and the public about Calgary's potential Heritage Districts. Established in 2014.

Guidebook for Great Communities – Released Jan 4, 2021

www.calgary.ca/guidebook

Comments: Calgary Heritage Initiative Society and Calgarians for Heritage Districts, January 28, 2021

1. The language of the Guidebook does not reflect the MDP. The principles and goals of the guidebook set the tone for what our communities will look like as they evolve. Neighbourhood character and heritage is missing.

Section/Page	Item	Concern/Issue	Suggestion
About iii	What...? The Guidebook provides direction for how to create great communities...	Language like “provide” and “create” implies “new”. Communities with heritage character already have a sense of place – this could be ENHANCED. The language has changed from “neighbourhood or community character” – something that Calgarians understand and voiced during the engagement for Plan It Calgary (2008) as reflected in the MDP (eg Goal 2.3 “Create great communities by maintaining quality living and working environments, improving housing diversity and choice, enhancing community character and distinctiveness and providing vibrant public spaces.” Policy 2.3.2 “Respecting and Enhancing Neighbourhood Character”)	What...? The Guidebook provides direction for how to create and enhance great communities...
P 12 Principles	Identity and Place: neighbourhoods are well designed and create a sense of place	Heritage is no longer mentioned in the Principles and Goals for the Guidebook– it’s buried in the definitions. Nowhere in the Guidebook does the term “neighbourhood character” appear, yet this is what residents in, and visitors to, heritage communities are most concerned about losing. Residents considering purchasing in a heritage community, purchasing an inventoried or designated home, or considering designation need certainty that their decision and investment will be protected vis-à-vis maintaining the streetscape.	“Identity and Place: neighbourhoods are well designed and create a sense of place by respecting and enhancing neighbourhood character” (add wording from MDP 2.3.2)
P 13 Goals	What are the most valued amenities in the community? #5 Provide spaces that foster a sense of place...	Heritage is no longer mentioned in the Principles and Goals for the Guidebook– it’s buried in the definitions. Nowhere in the Guidebook does the term “neighbourhood character” appear, yet this is what residents in, and visitors to, heritage communities are most concerned about losing. Residents considering purchasing in a heritage community, purchasing an inventoried or designated home, or considering designation need certainty that their decision and investment will be protected vis-à-vis maintaining the streetscape.	“What are the most valued amenities in the community... “ (Reinstate examples as per March 2020 version), “including public art, heritage resources, parks and vistas?” #5 Provide and enhance spaces that foster a sense of place...
P. 126 Appendices: Local Area Plan Chapter 1	Goals for Great Communities 5. Provide spaces that foster a sense of place and are designed for everyone.		Add 9. Respect and enhance neighbourhood character through the retention of heritage assets.

2. Urban Form Categories – Policies do not include heritage area policies for uses other than primarily residential. Identity and sense of place in the historical context should consider all uses.

Section/Page	Item	Concern/Issue	Suggestion
P26-43	Policies for Neighbourhood Urban form Categories 1-3 (Commercial, Flex and Connector)	<p>These are neighbourhood activity centres and commercial streets. There is no mention of heritage policy applying to these areas, yet they often define the distinct identity of a community and “fit in” with the residential character. Within neighbourhoods, commercial, institutional, industrial buildings and adjacent residential were typically developed in a similar era with compatible materials, architecture, and scale. The policies in this section do not reflect heritage retention through such tools as heritage density (transfer) or bonusing levies which could help to fund the Heritage Resource Conservation Grant program. We understand that work is currently underway on commercial heritage streets. We advocate for district policies that include residential, commercial, institutional, and industrial uses. The Guidebook is incomplete in this regard and does not provide sufficient direction to communities for the development of LAPS that retain and enhance heritage assets in these three non-residential categories, especially where they abut heritage-rich residential areas.</p>	<p>Include wording that references available heritage retention strategies, tools, and incentives for categories 1-3.</p> <p>Set as a priority for the Sustainment Committee to incorporate heritage area policies for categories 1-3 into the Guidebook.</p>

3. Neighbourhood Local Urban Form Category – It is not clear how this policy works with heritage policies and scale modifiers.

Section/Page	Item	Concern/Issue	Suggestion
P 48 Map 1, Zone A	These communities were developed prior to 1945...	Description of Zone A does not mention the significance and extent of remaining residential heritage assets concentrated in these communities. Intensity is targeted to these communities and could pull investment for redevelopment from activity centres and main streets as directed in the MDP	Demonstrate how Neighbourhood Local forms, Heritage Area Policies, Heritage Resources policies and Scale modifiers will work together to protect Zone A assets and encourage designation
P 48-9	c. i. on collector streets	In Zone A, highest intensity is encouraged on collector or higher-order streets. The amount of vehicular traffic on collectors does not warrant this highest intensity.	Remove “collector”
P 48-9 Map 1 Zone A & B Policies	c. and g. Higher intensity, low density residential forms should be supported... ii. near or adjacent to Main Streets, transit stations areas and other Activity Centres as defined by the local area plan.	“near” is too ambiguous. If a Main Street, transit station area or Activity Centre has a high concentration of non-residential heritage assets and/or a high concentration of residential heritage assets, then higher intensity forms will be allowed that might erode the integrity of a potential residential/commercial heritage district. Page 5 Heritage Conservation Policy Tools and Financial Incentives Report, April 2020, approved in July says “Heritage area policies are intended to apply to primarily low density residential properties. And area boundaries will not overlap with Main Streets ...” Wording is “overlap”, meaning ON a Main Street	c. and g. Higher intensity, low density residential forms should be supported... except where heritage policy areas apply (25% threshold of assets on a block face) ii. Delete “near”
	Zone A d . Moderate and lowest, low density residential forms should be supported where the parcel....	Most of the remaining residential heritage assets are low density and in highly desirable character neighbourhoods that are under development pressure. If there are a minimum 25% of heritage assets on a block face, a heritage policy area applies and if 50% or more, a Direct Control district may apply. If sufficient heritage assets exist to qualify for a heritage policy area, but they are within 600 meters of	Add to d., e. & h. ..meets the criteria for a heritage policy area (25% heritage assets on a block face) and (d. - one and e.-two and h.-one) of the following criteria: Suggestion: Change d.v, e.v, & h.v

	<p>e. Lowest intensity, low density residential forms should be supported where the parcel.... Zone B</p> <p>h. Lowest intensity, low density residential forms should be supported where the parcel....</p> <p>d., e. & h. v. is not located within 600 meters of a transit stop</p>	<p>a transit stop, all those residences could be demolished and redeveloped within a 1.2 km diameter circle, with multiple circles possibly overlapping or touching. Mapping this out could eliminate a very high percentage of heritage homes in a community.</p> <p>Transit stop is not defined – administration tells us that these include LRT stations or all transit stops, including bus stops.</p>	<p>is not located within 600 meters of primary transit stops.</p> <p>Suggestion: More refined definition of transit stop, modified to: PRIMARY transit stops.</p> <p>For context, calculate the number of residential heritage assets that meet the heritage area policy threshold of 25% relative to total existing housing stock in zone A neighbourhoods. These homes are worth protecting.</p>
	<p>d., e. & h. i. is laneless</p>	<p>This criterion relates to the presence of lanes.</p>	<p>Add definition of lane.</p>
	<p>d., e. & h. iv. contains or abuts an escarpment</p>	<p>This criterion relates to escarpments.</p>	<p>Add definition of escarpment.</p>
	<p>New criterion</p>	<p>It is difficult to determine contextual heights on steep slopes that may not be part of escarpments.</p>	<p>Add: is not located on a slope of greater than...define minimum grade</p>
	<p>New criterion</p>	<p>It is difficult to develop on odd shaped lots in areas with curvilinear streets.</p>	<p>Add: is not located on a curvilinear street</p>
	<p>d., e., & h. ii. is of a prohibitive parcel shape or size</p>	<p>How is prohibitive determined?</p>	<p>Define prohibitive lot size and shape</p>

<p>P 47 Limited Scale Residential Intensity Policies</p> <p>P 78 Limited Scale Modifiers</p> <p>P 83 Scale Transition</p>	<p>Refers to three storeys or less, actual height is not specified</p> <p>“consideration for site-specific characteristics, such as heritage”</p>	<p>A three storey row housing infill next to a low-density heritage home is a major contrast in massing and scale and eliminates landscaped area that supports mature trees.</p> <p>We understand that the Guidebook informed LAPs will replace existing ARPS and the Infill Guidelines.</p> <p>Unclear how “P 78 2.23 Limited Scale Policies b. Development in Limited Scale areas may limit building mass above the second story in Neighbourhood Local Areas” applies to heritage guideline areas. Does this address the height issue in heritage areas?</p>	<p>Recommendation for Guidebook Sustainment: Strengthen or define transitions if adjacent to a heritage asset or within a heritage policy area.</p>
<p>P 100 3.8 Heritage Resources Policies</p>	<p>Wording such as “encouraged”, and “should be explored”</p> <p>g. New development is encouraged to be compatible with the context of abutting sites on the inventory using setbacks, massing, street wall height and landscaping.</p>	<p>If new development isn’t required to be compatible with abutting sites, homeowners of a heritage resource may be discouraged from designating if part of what they want to protect is their streetscape. Designations of historic resources are more likely to happen in areas that have stability and protections</p> <p>There are only 300+ properties on the Inventory that had an original use as residential (including multi) and only about 10% of these (about 30) are designated now. There is a backlog of properties waiting to be inventoried and if designation is to be considered by the owners, they need assurance that neighbouring properties will remain contextual.</p>	<p>Strengthen to “must”, “shall”</p> <p>Add after abutting sites on the inventoryor scheduled for evaluation to be considered for the inventory....</p>
<p>P 111 Funding Tools and Incentive Strategies</p>	<p>... includes heritage density transfer bonus, property taxes</p>	<p>In July 2020, a delay in the adoption of the Guidebook and NHLAP was approved, in part to incorporate heritage tools and incentives policies.</p>	<p>Recommendation for Guidebook Sustainment: Complete and incorporate the work on density bonusing, commercial heritage streets, and additional tools and incentives to encourage designation.</p>

<p>P 112 Considerations for Community Funding Tools and Incentives</p>	<p>“The city is reviewing funding tools and investment strategy...”</p> <p>“There are several tools to realize these potential investments...Special Policy Area...”</p>	<p>Density bonusing is a tool that could fund the Heritage Resource Conservation Program. Heritage density bonusing, and some of the heritage tools and incentives (like tax credits) are not yet available for implementation. Much of the application of these tools seems to be pushed down to the LAP, rather than clearly defined by the guidebook.</p>	
---	---	---	--

4. Heritage Guideline Area Tool for Communities – Lacks certainty as to what could be regulated in the Guideline area and does not adequately address scale and lot coverage			
Section/Page	Item	Concern/Issue	Suggestion
P 113 4.1 b. iii	“Heritage Guideline areas should: ...exclude all parcels near or adjacent to an identified Main Street”	“near” is too ambiguous. There could be heritage assets on a Main Street and there could be similar era residential heritage assets near the Main Street that, together, would form a potential heritage district. See also comments under P 48-9 Map 1 Zone A & B Policies	Delete this policy
P 113 4.2 d	Heritage design guidelines may identify... vi. general massing considerations	Height is one of the most objectional items in redevelopment scenarios. The three-storey maximum is out of context for many heritage neighbourhoods. “May identify...general massing considerations” is too vague to address height issue.	Add: vii. Maximum height and scale transitions indicate that infills in a heritage guideline area would be discretionary
	ii. front yard setbacks	Setbacks are one tool to limit lot coverage. By only regulating front setbacks, and not side or rear setbacks and not regulating contextual % lot coverage, maximum lot coverage is encouraged. Potentially very large infills on typically larger lots in older communities are constructed that are built to the max of the allowable side yard. Removal of these “buffers” between homes has a negative impact on the character of the streetscape. This does not add intensity in the lowest intensity, low density residential form, except if a secondary/backyard suite is added which could also be achieved if the heritage asset is retained. Limited lot coverage and having front and side setbacks in keeping with the heritage area would de-incentivize demolition. A high percentage of lot coverage, narrow side setbacks, combined with higher infills reduces the landscaped area that supports retention of mature trees or planting of new ones. The MDP has a 60-year goal to increase tree canopy by	Include side set backs and modest maximum lot coverage

		2-3 times the 1998 7% coverage estimate, and this should be considered when establishing set backs and lot coverage in heritage guideline areas.	
P 113 4.1 e.	Heritage design guidelines may not include guidance regarding the following: i. Land use designation ii. Parcel size; and, iii. Number or size of dwelling units or suites	<p>This policy provides for a change of use to allow for multifamily and subdivision with narrow infills.</p> <p>P 5 Heritage Conservation Policy Tools and Financial Incentives Report, April 2020, approved in July states: “Proposed heritage area policies do not attempt to restrict the allowable use/activities or number of dwelling units on a property.” This does not refer to “parcel size.”</p> <p>Small scale/low density is an incentive for low density areas in the heart of residential communities (significant differentials in height and massing DE-incentivize people in low density communities to keep their heritage assets — re Infill Guidelines & repeated complaints from residents about infills; combined with financial gain of selling properties to developers who will upzone)</p> <p>Guidebook does not reference Direct Control layer 3 tool or describe how that tool can regulate massing, lot size, lot coverage # of units, etc.)</p>	<p>Heritage design guidelines may not include guidance regarding the following, except where lowest intensity, lowest density residential forms occur within the heritage policy area...</p> <p>Clarify how Neighbourhood Local policies for lowest intensity, low density forms, the Heritage Guideline Area Tool, limited scale modifier, Layer 3 DC, proposed land use by law and the role of covenants/restrictive covenants work together to protect heritage areas.</p>

**North Hills Local Area Plan – This Pilot plan for Guidebook Implementation does not include the Heritage guideline area policies.
Released Jan 4, 2021: <https://engage.calgary.ca/NorthHill/realize>**

Section/Page	Item	Concern/Issue	Suggestion
p. 33, 2.4 General Policies	Policy 3. In addition to the heritage policies of the guidebook, the conservation of heritage resources is encouraged by supporting higher-density development and/or additional uses on sites where a heritage resource or cluster of heritage resources is retained.	Wording does not include heritage assets. If higher density is encouraged on these sites, the streetscapes won't be protected. This sounds like a policy suited to Commercial Main Streets, but not residential, especially the lowest intensity, low density Neighbourhood Local form.	Include heritage assets or heritage assets within Heritage Guideline Areas. Specify that this policy does not apply to non-residential lowest intensity, low density Neighbourhood Local form.
P.9 Neighbourhood main streets	Does not reference whether any of these are heritage main streets under study	Historic neighbourhood Main Streets should be considered in the context of the heritage guideline areas	Identify historic main streets, is any on the NH maps Sustainment priority for historic Main Street policies
p. 48, 2.12 p 69, 4.3 Local Area Plan Implementation, Monitoring, Review and Amendments	The Plan recognizes that further work is required to both identify and draft the appropriate guidelines. P 48. Policy 1. Land use redesignations for higher density development are discouraged until heritage policy tools	The NHLAP is still incomplete regarding the application and implementation of the heritage tools and incentives. We advocated for inclusion of these heritage policies in July when the extension to first quarter 2021 was approved and are disappointed that the work is still not included. Will the heritage areas change with the verified windshield survey? What does "higher density" mean? Higher than existing or higher than now allowed by the LUB/ARPs etc.	Sustainment priority must be to identify and draft the guidelines for the identified heritage areas. Clarify and strengthen the wording of P 48 Policy 1

	have been explored in the plan area.	“discouraged” is weak	
p. 56 3.2.1	Creating Great Communities	“Creating” implies new – not respecting what already exists	Add and enhancing
p. 68 4.2 LAP Interpretation	14. Existing Caveats/Restrictive Covenants “Some parcels in the plan area may have caveats registered against the certificate of title which may restrict development. These restrictions may include, but are not limited to, restricting development to one or two-unit dwellings. In some cases the caveats may not be in alignment with the goals and objectives of this Plan and where such conflicts occur, The City of Calgary supports the direction of this Plan. It is the responsibility of landowners to have caveats discharged from their land title certificate.”	The way it reads now doesn’t acknowledge the importance of these historic caveats in some communities as having defined the building scheme and is effectively telling landowners to discharge them in order to realize the plan. By modifying this in the NHLAP, it sets an example for including similar wording in other LAPS – such wording/direction could also be added to the Guidebook. The crux of the issue is that the NHLAP is the pilot, heritage guideline areas are mapped, but the guidelines have not been developed so we can’t know how the various policies will be defined, considering existing “tools” (like DCs and caveats) and how they will work together with other policies in the plan to “respect and enhance neighbourhood character” (from 2.3.2 of MDP).	Suggest modifying to read that these Caveats/RCs may be considered when developing the heritage policies/and or guidelines as identified in section 2.12 Suggest adding to the end of the last sentence” or collectively defend the caveats through legal channels ” Similarly include “existing DCs may be considered when “developing the heritage policies/and or guidelines as identified in section” Reference similar wording in the Guidebook so that it can apply to other communities with these instruments.
P 21 Map 2 P 49 Map 5	Community Characteristics & Attributes or Heritage Guideline Areas	With our economic outlook, commercial vacancy rates, and move to work from home (a trend we are seeing because of Covid), and given the environmental/sustainability benefits of repurposing, this could relieve some of the pressure to redevelop residential in the core of communities, support it in the nodes and corridors and avoid creating more competition	Include a map that shows Inventoried, Designated and Heritage Assets as a reference (noting that it is constantly being updated) and that properties be identified on this map that the communities support for repurposing – say from vacant

		<p>for already oversupplied inventory. The NHLAP refers to repurposing Tuxedo Park School – great. The LAPs should identify a list of candidates for repurposing for suggested possible uses and add policy that such change of use would be supported. These could be heritage or non heritage buildings. Also – the NHLAP has no mention of density bonusing (transfer) yet the Guidebook suggests it could be applied – eg to the candidates for repurposing. Again the NHLAP is incomplete and lacking granular detail.</p> <p>Example of identification of Heritage resources: https://beltline.ca/media/17%20AVE%20Design%20Strategy.pdf</p>	<p>commercial to residential. For the NHLAP It could be added to the maps on P 21 or 49 or a separate one in the appendix as a reference.</p> <p>Identify where density bonusing could apply.</p> <p>Specify how the density bonusing payments would be used in the community – ideally to boost the <i>Historic Resource Conservation Grant</i> in order to support repurposing</p> <p>Enable bylaw relaxations as needed (e.g. change of use, parking) and promote the non-residential conservation grant</p>
p31 Map 4	Building Scale – Limited up to 3 storeys	P 78 of the guidebook provides for Limited Scale Modifier 2.23 b. Development in limited scale areas may limit building mass above the second story in Neighbourhood Local areas.	Identify areas where the limited scale modifier could be applied in the NHLAP area.,