



March 12, 2021

Response to Guidebook for Great Communities and North Hill Communities Local Area Plan

Dear Calgary City Council

The Guidebook for Great Communities and the North Hill Communities Local Area Plan, the pilot multi-community plan for the new Guidebook, comes before City Council for Approval on March 22, 2021.

The City is undergoing sweeping changes to its planning system in order to realize a more sustainable future. This new approach to area planning divides the city into some 42 districts, each tasked with the creation of an area plan that enables population growth in balance with heritage retention and that sense-of-place that defines “home”. Residents and other community stakeholders have a critical voice in the creation of these plans. Communities with existing statutory and non-statutory plans will see these replaced with new district plans. Five such plans have been initiated to date, affecting more than 50 communities. The Guidebook incorporates new Heritage Conservation Tools and Incentives approved in July 2020, however, **the new heritage policies have not yet been applied to the North Hill Local Area Plan** (although the eligible blocks have been mapped). This is very concerning.

This submission represents years of participating in stakeholder engagement in the development of City policy, input from our broad audience base, other heritage groups (notably Calgaryans for Heritage Districts - CFHD), and a review of best practices in other cities, CHI submitted a list of heritage-related concerns to the Standing Policy Committee on Planning and Urban Development on Feb 3, 2021. That committee recommended that City Council approve the Guidebook and North Hill LAP on March 22. We continue to reach out to City Administration and Councillors with our concerns (some of which have been addressed) and have carefully considered their responses.

CHI maintains that Calgaryans are ready for heritage policies that encompass special areas with historical integrity, not just individual buildings, while embracing growth and change where it makes sense. We support the Heritage Conservation Tools and Incentives Report, approved July 2020. This is a leap forward for heritage conservation in residential areas that begins to bring Calgary in line with other Canadian cities. It enables the incorporation of hidden density, while conserving the sense of place that is defined by our heritage resources. We support the new approach to district planning, enabled by the Guidebook.

Not every building can or should be preserved. Heritage preservation is more than saving individual buildings. It is also about respecting the architecture, scale, and streetscapes that reflect a sense of place. Time and again we hear that trees are as much a part of Calgary’s heritage areas as is the built form.

Our “Asks” of City Council on March 22, 2021 are:

1. Approve the Guidebook for Great Communities with clarifying and strengthened wording changes (further detail attached with policy references).

- a. Amend the introductory language to better reflect that local area plans should be INSPIRED by our heritage.
- b. Align the new housing forms that define the intended intensities of the housing forms with the identified Heritage Guideline Areas (those with at least 25% of the block face identified as “heritage assets”). Specify maximum scale, massing, lot coverage, and include side setback criteria in the heritage area policies. These changes are necessary to support streetscapes.
- c. Protect residential heritage areas adjacent to heritage Main Streets (commercial areas) where they could potentially form a “district”.
- d. Extend protections for potential heritage resources awaiting evaluation and inclusion on the Inventory of Evaluated Historical Resources.
- e. Strengthen language for conservation and repurposing ('must', 'required', 'will' instead of 'should', 'encourage', 'may') so that the policies are not open to interpretation or simply ignored.
- f. Make Development Permit applications for all Identified heritage assets discretionary to allow for Community Association circulation.
- g. Strengthen protections for private trees by limiting lot coverage.

2. Recognizing that the North Hill Communities LAP is incomplete, especially regarding heritage, address the following:

- a. Prepare a risk assessment for NHCLAP in regard to heritage loss as work continues on developing the tools and incentives, Main Streets, heritage density transfer, etc.¹
- b. Complete the development and application of the Heritage Guideline Area Tools with a firm completion date in the first quarter 2022. As a further interim measure, flag all heritage assets for discretionary DP application review while the tools are being developed.
- c. Incorporate any changes to the Heritage Guideline areas arising from the 2020-21 verification of the Windshield Survey.
- d. Apply the direction from P.24, Chapter 1, 2.2 b of The Guidebook (Individual community characteristics and attributes) These items are missing: ii. Community demographics and trends; v, cultural and heritage assets; vi. development constraints (infrastructure); vii. parks and recreational facilities; including current capacity; and ix. significant view corridors.
- e. Assess the effectiveness of the pilot rollout of the Layer 3 Direct Control Districts. Consider best practices for communicating the Layer 3 DC’s and involve Community Associations and heritage advocacy groups in the rollout.

¹ NHLAP “2.12 Heritage Guideline Areas Policy 1: Land use redesignations for higher density development is discouraged until heritage policy tools have been explored in the Plan area.” This interim provision does not address DP applications for infill development and the implications for loss in the mapped heritage conservation areas.

- f. As per the suggestion for Guidebook sustainment, include an analysis of the evolving demographics of the North Hill Communities to identify growth and change needs and suggest opportunities for repurposing.
- g. Incorporate #1 Guidebook Recommendations above.

3. Delay other LAPS that contain heritage assets as identified in the Windshield survey until the North Hill Communities pilot LAP is complete and approved.

4. Direct Guidebook Sustainment to develop policies that enable the LAPS to:

- a. Identify and map buildings (heritage and other) that are valued because of their contribution to the sense of place in communities. These buildings could be underutilized or identified as possibilities for filling a community gap, for example in affordable housing. Inform these opportunities with demographic analysis. Develop policies to direct and support building owners to consider repurposing. Repurposing buildings results in a lower carbon footprint than new builds. The purpose of the guidebook is to operationalize the MDP. The guidebook has not operationalized the MDP's intent to encourage and enable adaptive reuse. High vacancy rates and moderated population growth forecasts support this direction.
- b. Include 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 the streetscapes in their local neighbourhood 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, as was the intent of the Infill Guidelines. Allow for the consideration of historical Restrictive Covenants (that defined a building scheme) and existing Direct Control Districts in developing these community specific policies, where applicable, and supported by the residents.
- c. Strengthen or define scale intensities, transitions and modifiers for identified heritage assets, those adjacent to a heritage asset or within a heritage policy area. (See Guidebook P 47 Limited Scale Residential Intensity Policies, P 78 Limited Scale Modifiers and P 83 Scale Transition).
- d. Apply direction for historic Main Streets (we understand that planning for historic Main Streets is currently under study). Set as a priority for the Sustainment Committee to incorporate heritage area policies for Neighbourhood Commercial, Flex and Connector Urban Form categories into the Guidebook.
- e. Identify and track Key Performance Indicators (KPIs) for heritage retention, such as progress on evaluations, number of requests to be considered for evaluation for the Inventory, requests for removal from the Inventory, designations achieved, and number of demolitions occurring. Adjust the implementation of the heritage policies as indicated.
- f. Introduce a private tree protection bylaw (removal by permit with a fee) as Vancouver has introduced.

5. Direct Administration to describe and communicate:

- a. 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 to achieve heritage retention.² Although we have attempted to clarify the specifics of what layers 2 and 3 of the Heritage Tools will regulate, some of the responses have been inconsistent with page 113 of the Guidebook (4.2 d. “Heritage design guidelines may identify character-defining elements that new developments should include such as the following...”). “Should” and “such as” are vague. With no Guidebook application “test” in the pilot NHCLAP to refer to, and only the experience of weak uptake of what is essentially the Layer 1 tools in Bridgeland, the effectiveness of these tools in protecting historic streetscapes, trees, and even buildings (by encouraging designation) is unclear.
- b. The risks to heritage, given that “upzoning” will be enabled by the plan without yet having approved and implemented the suite of incentives (eg residential tax credits, density bonusing, full funding of the non-residential Heritage Resource Conservation Grant program), as detailed in the Heritage Conservation Tools and Incentives Report. Include this risk assessment in the North Hill Local Area Plan.
- c. Clarify the intent regarding alignment of the Land Use Bylaw with the Urban Form categories in an approved Guidebook and what this could mean for “upzoning” in communities.

Thank you for your attention. Please support amendments to strengthen heritage policies in the Guidebook and Local Area Plans to which it will be applied.

Karen Paul and Tarra Drevet

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

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

² Refer to MDP “Objective 2.3.2 Heritage and Public Art - Alignment: To be most effective, heritage. conservation efforts must be integrated and aligned with overall community and City goals, planning principles, practices and process across all stakeholder groups.”

Guidebook for Great Communities – Released Jan 4, 2021

www.calgary.ca/guidebook

Comments: Calgary Heritage Initiative Society and Calgarians for Heritage Districts, March 12, 2021

Issue/Concern	Item	Suggestion
Chapter 1: Introducing		
<p>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. “Respecting and Enhancing Neighbourhood Character” (as per the MDP 2.3.2) and heritage is missing. Language like “provide” and “create” implies “new”. Communities with heritage assets already have a sense of place. Local Area Planning does not start with a blank slate. “enhance” implies no more expectation of City investment that “create” or “provide”.</p>	<p>Section/Page P. iii About..What...? P. 12 Principles Identity and Place P. 13 Intro and Goals #5 P. 126 Appendices: Local Area Plan Chapter 1 Principles and Goals</p>	<p>Align wording for About, Principles and Goals and to better reflect MDP and mention heritage in BALANCE with growth and change.</p>
Chapter 2: Planning		
<p>Patterns of streetscape are key to defining “community characteristics and attributes and include elements such as: setbacks of buildings; placement of garages; landscaping and/or mature trees; roof pitch; materials; porches and gables sidewalk width, etc.</p>	<p>P. 24 2.2 b Local area plans should be informed by community characteristics and attributes, including, but not limited to:</p>	<p>Insert new ii: “patterns of streetscape”</p>

Issue/Concern	Item	Suggestion
Chapter 3: Building		
<p>Neighbourhood Local Urban Form Category should work together with heritage policies and scale modifiers to protect heritage. Heritage Guideline Areas (as mapped in the LAPs) should be included in the criteria for the Neighbourhood Local policies. Otherwise, upzoning is encouraged and heritage retention is de-incentivized relative to the redevelopment potential of parcels. The effectiveness of how these policies will work together has not been proven in the North Hills Lap Pilot.</p> <p>Communities that are primarily R-C1 should be able to determine where row housing (R-CG) will go.</p>	<p>P. 48-49 Criteria for Zone A & B. higher, moderate and lowest intensity</p>	<p>Eg. if the block face with 25%+ heritage assets is predominantly single-detached (with or without secondary and backyard suites) then housing forms should be limited to the lowest intensity, low density residential form. (See P. 131, Appendix Table 1) Similarly, heritage assets that are predominately of moderate intensity should determine that this intensity, not the highest intensity, would apply.</p>
<p>Some community volunteers have tested the application of the Neighbourhood local urban form criteria in low-density areas with known heritage integrity. They found that the lowest intensity, low density form would not apply to a high percentage of the heritage assets in that community, Because some developed neighbourhoods are very small and may not experience through traffic, the volume of traffic may not warrant higher density relative to non-collector streets.</p>	<p>P 48-9 Map 1 Zone A & B Policies c. and g.</p> <p>. “Higher intensity, low density forms should be supported: i. on collector or higher order streets as identified in the Calgary Transportation Plan; and, ii. near or adjacent to Main Streets, transit areas and other activity centres as defined in the Local Area Plan”</p> <p>d.v, e.v, & h.v “is not located within 600 meters of a transit stop”</p>	<p>Change to “on collectors with greater than xx (TBD) average weekday traffic count”</p> <p>Delete “near” or define “near” in relations to Main Streets and transit areas.</p> <p>Add...after near or adjacent to Main Streets... “(except if a Historic Main Street)”</p> <p>Define transit areas and stops as PRIMARY transit stops or reduce the 600 meter radius</p>

<p>If new development isn't required to be compatible with abutting sites, homeowners of a heritage resource may be discouraged from designating their property 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 are designated now. There is a backlog of some 500 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>P 100 3.8 Heritage Resources Policies</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>A stop-gap is needed until the inventory has caught up and the rest of the heritage incentives, density bonusing, etc. are adopted. Provide direction to Heritage Planning to complete the assessment of the heritage assets identified in the verified windshield survey, prepare a list of those assets eligible for consideration to be added to the inventory, and expand Guidebook policy 3.8.g. to include these assets under consideration for addition to the inventory:</p> <p>Add after abutting sites on the inventory "...or scheduled for evaluation to be considered for the inventory...."</p> <p>Replace "is encouraged to" with "must".</p>
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Chapter 4 Tools for Great Communities: Heritage Guideline Area Tool for Communities

Concern/Issue	Item	Suggestion
<p>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, our suggestion to modify the wording that allows higher density “near or adjacent to main streets” would protect the integrity of potential heritage districts that have both residential and commercial assets of a similar scale, style or era.</p> <p>See also comments for P 48-9 Map 1 Zone A & B Policies.</p>	<p>P 113 4.1 b. iii “Heritage Guideline areas should: ...exclude all parcels near or adjacent to an identified Main Street”</p>	<p>Delete this policy or add...</p> <p>"except if the main street is a heritage main street and/or where residential heritage area guidelines apply."</p>
<p>Lacks certainty as to what could be regulated in the Guideline area and does not adequately address scale and lot coverage.</p> <p>Height and massing are the most objectional items in redevelopment scenarios. The three-storey maximum is out of context for many heritage neighbourhoods. Allowing bigger homes does not add density. Higher lot coverage reduces the landscaped area that supports retention of mature trees or planting of new ones, a key element that defines community identity and sense of place. Many historic communities have 20-30% lot coverage. The current bylaw allows 45%. Increasing to 60% would dramatically change streetscapes. higher percentage of impermeable surface impacts storm water management.</p>	<p>P 113 4.2 Heritage design guidelines may identify...</p> <p>ii. front yard setbacks</p> <p>vi. general massing considerations</p>	<p>Add to character-defining elements in 4.2.d:</p> <ul style="list-style-type: none"> -Side set backs -Modest maximum lot coverage -Maximum height and scale transitions -Consideration of the character-defining elements in existing historical Restrictive Covenants (that defined the original building scheme) or Direct Control Districts <p>Indicate that infills in a heritage guideline area would be discretionary and that all heritage assets would be subject to a discretionary DP process to allow for Community Association circulation.</p>

<p>Small scale/low density is an incentive designation in the heart of residential communities. Significant differentials in height and massing DE-incentivize owners in low density communities to keep their heritage assets.</p>	<p>P 113 4.2 e.</p> <p>Heritage design guidelines may not include guidance regarding the following:</p> <ul style="list-style-type: none">i. Land use designationii. Parcel size; and,iii. Number or size of dwelling units or suites	<p>Add....</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>
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