



March 31, 2021

Members of City Council,

RE: Heritage Conservation -Interim Policy

Heritage Regina would like to thank City Council for the opportunity to share our comments on this Interim Heritage Conservation Policy.

We would like to thank City Administration for developing a policy that deals with some of the issues Heritage Regina identified with the current Heritage Policy. The lack of a maintenance policy for designated buildings and the lack of a process for ongoing identification of heritage properties was troublesome. This proposed interim policy address these two areas of concern in a manner that Heritage Regina can support. We are also pleased that the city is reviewing its incentives policy and seeking additional or enhanced provisions.

Our first opportunity to review this document was only a few days before the Executive Committee meeting on March 22, 2021. We attended that meeting and had the opportunity to ask the various questions listed in this letter. Unfortunately, many of the questions regarding the procedures for the economic viability assessment went unanswered. Although the timelines for the community consultation and policy evaluation were explained, we left the meeting unclear on when in the process Heritage Regina will be consulted and what form that consultation will take. Communication with stakeholders and the community is critical to ensure the success of this policy and to ensure a robust evaluation can occur.

Before we can support the Assessment of Financial Feasibility section of the proposal, we would like to get clarification on the following:

1. We would like to understand what the writer means when they say: *“The ability of the property owner to invest their share depends on a variety of factors including their personal financial position, the type of property and capacity to generate future income.”*
 - a. We do not understand why the capacity to generate future income is a consideration. How does the city propose to assess this? Since when is it the City’s responsibility to ensure that a property owner makes money in the future on their investment, be it the initial investment or an investment in improvements.

2. There is a risk that a condition assessment and resulting maintenance requirements could be a deterrent for those seeking voluntary designation. People may not be interested in participating in a financial viability assessment for privacy reasons.
3. The proposal does not clearly outline how economic viability will be assessed. It discusses an engineer led condition assessment and opinion of cost for the owner, but fails to identify how the owners “personal financial position” will be factored in. How will the city assess the ability of the property owner to pay for the minimum acceptable level of conservation? How will the “opinion of cost” for the property owner be factored into the viability assessment and what weight is it given in the overall designation assessment? We support determining a minimum level of conservation and cost, but we cannot support this section of the proposal as it is not clear how financial viability is ultimately established nor does it indicate the impact of this assessment on the assessment of the property for designation.
4. We would like to understand why, if “best practices recommend that heritage value and the feasibility of rehabilitation be considered separately...” does the policy recommend combining these two aspects of assessment? Heritage Regina does not support the combining of these two items in the assessment of a property because:
 - a. A negative assessment of the feasibility of rehabilitation or an owner being unable to afford the minimum acceptable level of conservation, could lead to historically significant properties being downgraded to a Grade 2 in the assessment process. This is what happened to the Bagshaw residence. This creates a situation where the heritage value is considered less significant than the costs of repairs. With demolition, the property and its history are lost to the community forever. Even if not demolished the story of this property will not be told to the community as it does not meet the criteria for designation. Please see #2 below for a recommendation that can ensure the history of properties that would otherwise be suitable for designation can be recognised and the history maintained in the event of demolition.
 - b. Using a financial viability assessment as part of the heritage assessment will lead to more properties being removed from the inventory despite their heritage significance. Heritage significance does not change, but ownership and financial viability can. There is no provision for re-assessment for properties removed from the inventory based on financial viability.
5. The policy is not clear if the assessment of financial viability will be completed for every property that is being assessed for heritage designation or just for those for which serious concerns about structural integrity are identified by the inspection indicated in the section called Property Inspection at the Time of Designation.
6. There is no provision under the Financial Viability section to deal with a situation where an inspection at the time of designation does not identify serious structural issues, yet the property owner disagrees and wants a further inspection and/or assessment of financial viability. Would the property owner not then be responsible for the costs?

Without further clarification and an opportunity to consider the response to our questions, Heritage Regina cannot support the Assessment of Financial Feasibility section of this proposal.

Heritage Regina would like to suggest a few items for inclusion in this policy which we feel will make the policy more comprehensive and address some additional items that are lacking in the current policy.

1. One issue identified by property owners and real estate professionals is the lack of information and understanding of the implications and benefits of a property being on a Heritage Inventory list or being designated. As the city has already embarked on efforts to educate current property owners, Heritage Regina recommends that a process be developed to address changes in ownership.

Change in ownership of designated properties or property on the inventory list should trigger a notification to the city and in turn the city reaching out to the new owner and to provide information regarding the heritage policy, assessment, designation, and incentives. The information provided should be based on the status of the property, meaning that owners of designated properties would receive a copy of the assessment, information on the inspections and the results, including outstanding work, the heritage policy and the incentives program, as well as contact information for city staff available to assist them. Along with contact information for city staff, new owners of properties on the inventory should receive information on the heritage policy, how the assessment works, how to request designation and the incentives program for designated properties.

This notification process would ensure ongoing education for property owners on the history and importance of their property, the value of owning a heritage property and ensure that owners are aware of requirement for maintenance and understand what programs are available to assist them.

2. Heritage Regina recognizes that not all significant properties can be retained, and demolition will still occur. Therefore, we recommend:
 - a. A program that recognizes heritage properties that we cannot keep. The program should include a plaque program so that walking tours can include those locations, private citizens can visit and learn about heritage properties. This will ensure the history of our city is not eroded by demolition of heritage property.
 - b. In addition to a plaque program, we recommend a web-based option that includes all the Grade 2 assessed properties, all designated properties and all Grade 1 and Grade 2 properties that have been demolished.

We cannot lose the story of our city's growth and development because of demolition or because a property does not have city-wide significance. Nor can we leave the recognition of the contributions of our city's builders, craftsmen, architects, working people and community builders to individual homeowners. The city has a responsibility to acknowledge, honor and preserve our heritage as indicated on Pages 2 and 3 of this proposed policy. A recognition program for heritage properties accomplishes this.

Sincerely,

