

OUR CITY. OUR FUTURE.

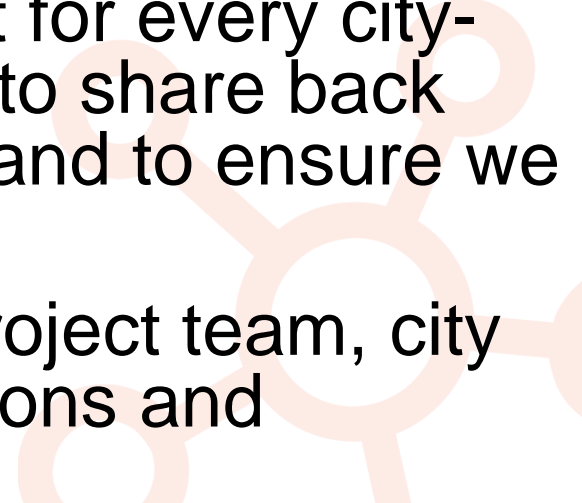


# Heritage By-Law

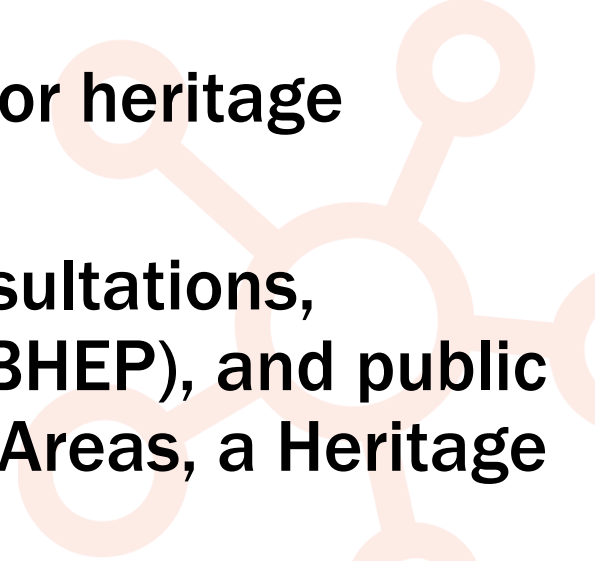
What we Heard from Public Engagement  
August 2021

**ST. JOHN'S**

# Disclaimer

- This document aims to provide a summary of what was heard from participants during the public engagement process. It is not meant to reflect the specific details of each submission or conversation word-for-word.
  - The City produces a What we Heard document for every city-lead project where public engagement is used to share back with the community the commentary collected and to ensure we heard you correctly.
  - The full scope of commentary is used by the project team, city staff, and Council to help inform recommendations and decisions.
- 

# Context and Background

- **During the Envision St. John's review of the Municipal Plan and Development Regulations, staff recognized that a Heritage By-Law would provide better protection of built heritage.**
  - **A by-law derives its authority from the City of St. John's Act, which has specific provisions for built heritage.**
  - **The City Act provides a more secure foundation for heritage protection.**
  - **Based on feedback from the Envision public consultations, meetings with the Built Heritage Experts Panel (BHEP), and public comments on various developments in Heritage Areas, a Heritage By-Law was drafted for public review.**
- 

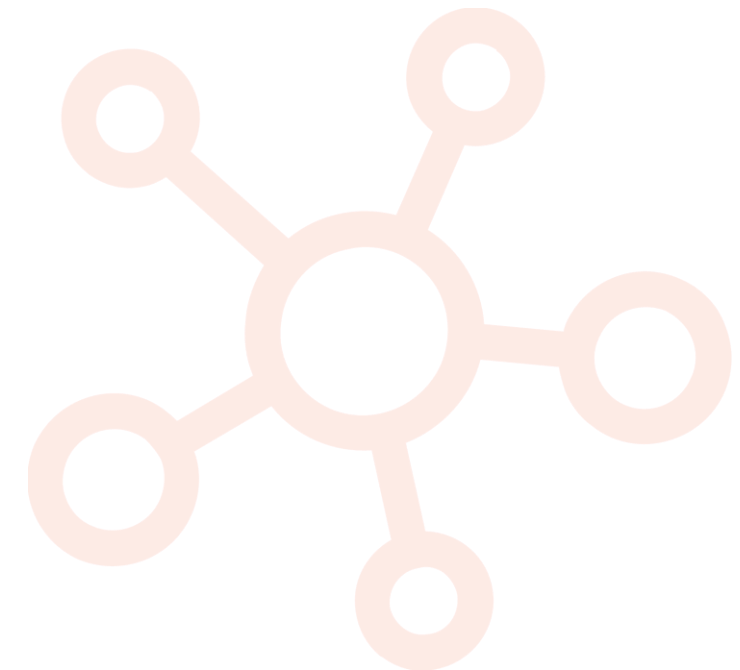
# Purpose of Public Engagement

- To inform the public of the City's planned approach to heritage protection.
- To gain feedback on the draft Heritage By-Law.
- Use the feedback to evaluate where changes to the By-Law may be needed.



# Stakeholders

- **Owners or tenants of designated Heritage Buildings**
- **Owners or tenants of buildings in the Heritage Areas**
- **Residents with an interest in St. John's heritage**
- **Heritage NL**
- **NL Historic Trust**
- **NL Association of Architects**
- **Canadian Home Builders Association NL**
- **Downtown St. John's Incorporated**
- **George Street Association**





# Public Engagement Tools

- Addressed mail to owners of designated heritage buildings
  - Project page on EngageStJohns.ca with a Forum, Question and Answer and Frequently Asked Questions
  - Two virtual public sessions for residents and interested parties
  - One focus group meeting with stakeholder organizations
  - One virtual meeting with representatives from downtown church congregations
  - One meeting with the Built Heritage Experts' Panel (BHEP)
  - Emails to [engage@stjohns.ca](mailto:engage@stjohns.ca) and [cityclerk@stjohns.ca](mailto:cityclerk@stjohns.ca)
  - Phone calls via 311, Council, and staff
- 

# Points of Engagement

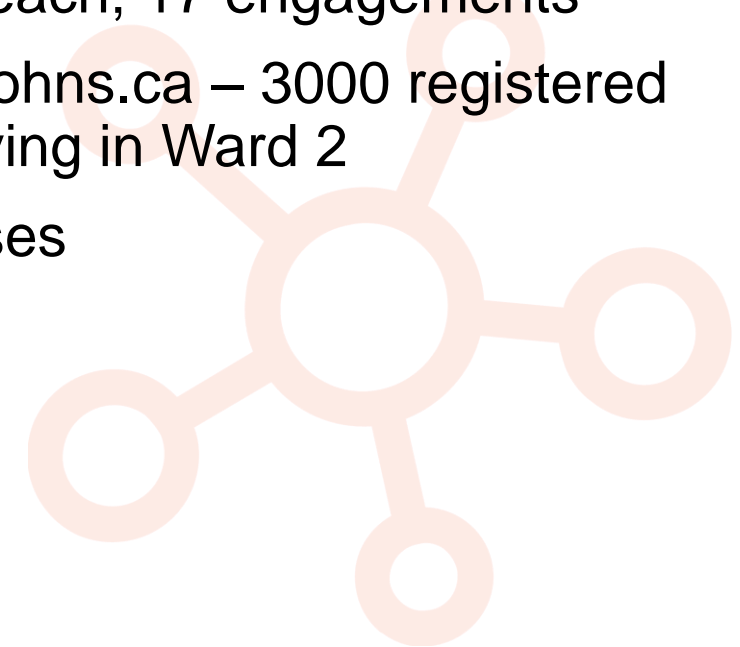
- **56 emails received**
- **541 unique visitors to Engage project page**
- **39 people attended the Heritage By-Law public meetings and 40 attended the Battery neighbourhood meeting**
- **Focus group meeting included representatives from Heritage NL, Downtown St. John's Incorporated and the NL Association of Architects**





# Promotion of Public Engagement

- PSA on stjohns.ca
- Four posts on Twitter – 35,200 reach; 87 engagements
- Four posts on Facebook – 6,503 reach; 32 engagements
- Three posts Instagram – 328 reach; 17 engagements
- Newsletters through engagestjohns.ca – 3000 registered users with 750 identifying as living in Ward 2
- Addressed mail to 215 addresses

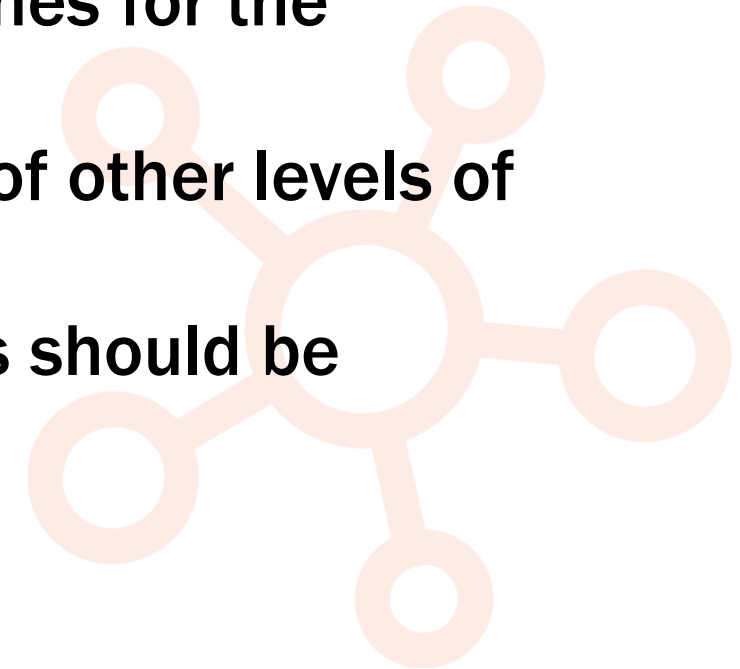




# Highlights of What we Heard

Many written submissions indicated the following:

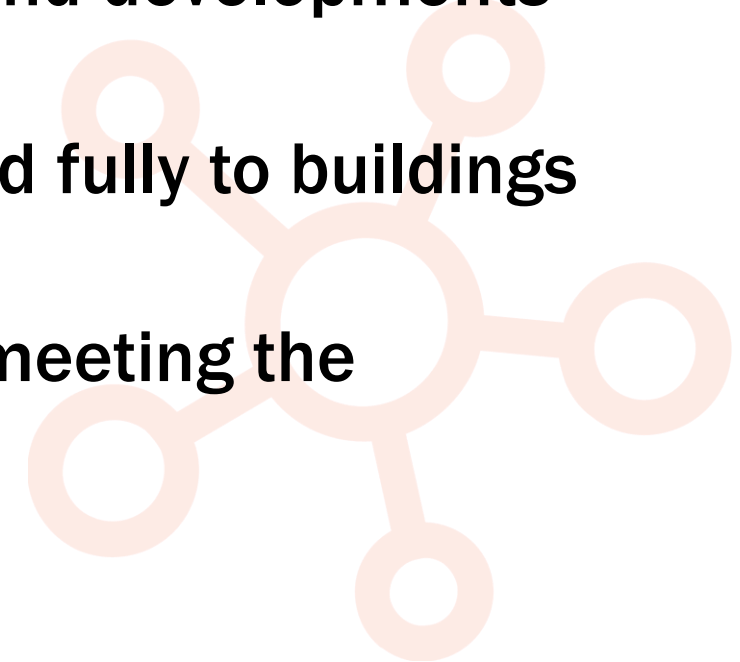
- There is far too much discretionary language in the By-Law.
- Further engagement should be required.
- The City should adopt the Standards and Guidelines for the Conservation of Historic Places in Canada.
- The City should formally recognize designations of other levels of government.
- The minimum requirements for Heritage Reports should be enhanced.



# Highlights of what we heard

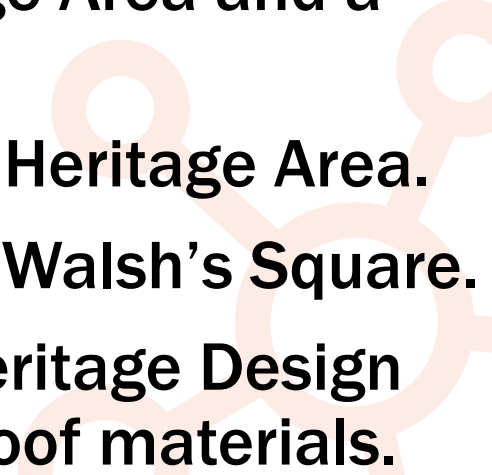
Many written submissions indicated the following:

- **Heritage Reports and public consultation should be required for new developments in Heritage Areas, extensions to existing buildings in Heritage Areas/Heritage Buildings and developments adjacent to Heritage Buildings.**
- **The Heritage Design Standards should be applied fully to buildings taller than 18 metres.**
- **New developments should not be exempt from meeting the Heritage Design Standards.**



# Highlights of what we heard

A few written submissions also suggested the following:

- The inspectors should receive additional training.
  - The Built Heritage Experts' Panel (BHEP) should contain more historians, a council member, a resident of a Heritage Area and a structural engineer.
  - There should be statements of significance for each Heritage Area.
  - Heritage Area 4 should include Signal Hill Road and Walsh's Square.
  - The following topics should be re-evaluated in the Heritage Design Standards: garages, window materials, roof decks, roof materials.
- 

# Select Quotes from Submissions

*Council should work proactively with existing owners in the downtown heritage area to regenerate the older commercial buildings on Water and Duckworth to use the first floor as commercial space and then the upper floors as apartments.*

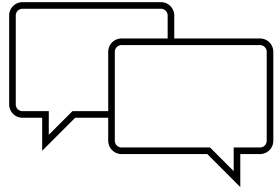
*To protect the visual and historic integrity of our heritage areas I would also like to stress that Heritage Reports should not be waived under any circumstances.*

*I believe the inclusion of the National Standards and Guidelines for the Conservation of Historic Places in Canada as a common reference point on heritage preservation would be very beneficial to our community as they prescribe proven approaches to heritage preservation in the Canadian context.*

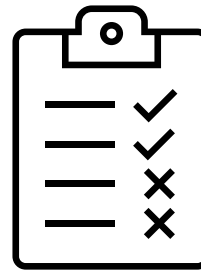
*The future of our downtown and harbour is important to our whole province: to our tourism sector and our economy, as well as to the citizens who live and those who run businesses and work here. These important decisions need not be rushed.*

*Studying, expanding or amending the heritage areas will provide a greater level of protection to the city's built heritage.*

# Next Steps



Release  
What We Heard



Council to discuss  
edits to the Heritage  
By-Law at a  
Committee of the  
Whole meeting



The Heritage By-Law  
is passed through a  
notice of motion, then  
a vote at the following  
Council meeting

Follow the project page or sign up to receive notifications at [engagestjohns.ca](http://engagestjohns.ca)

To stay informed



The screenshot shows the St. John's City website. At the top, the logo "ST. JOHN'S" is visible, along with navigation links for "Home" and "Citizen Committees - Members page". A search bar and "Sign In | Register" links are also present. Below the header is a large banner with the text "Engage! St. John's" and an illustration of people interacting with colorful buildings and speech bubbles. The main content area is titled "Heritage By-Law" and includes a breadcrumb "Home » Heritage By-Law". There are social media icons for Facebook, Twitter, LinkedIn, and Email. A black and white photograph of a historic street scene is featured. To the right of the photo, there is a text block explaining the purpose of the Heritage By-Law. Below this, a "Documents" section lists a "Draft Heritage By-Law (including Schedules) (6.78 MB) (pdf)" with a "more.." link. At the bottom right, there is a "STAY INFORMED" section with a megaphone icon, a "Subscribe for project updates" link, and an email sign-up form with the placeholder text "Your email address...".

# Appendix – Summarized Comments

Note: Some comments are verbatim from submissions and others have been summarized.

Concern	What We Heard
General	<ol style="list-style-type: none"> <li>1. The draft Heritage By-Law has serious weaknesses which undermine the vision and commitments embodied in the Envision St. John’s Municipal Plan document. The proposed Heritage By-Law would directly contradict the well-meaning goals of the new Envision St. John’s plan which clearly states, "The key is to manage growth in a sustainable manner while maintaining the character of St. John’s." With many available exemptions and weak enforcement, the By-Laws would provide an easy path for developers to get around existing heritage requirements.</li> <li>2. There is far too much discretionary language proposed in the documents: the word “MAY” should become SHALL.</li> <li>3. The By-Law as written has serious loopholes that weaken the clarity of intent and the consistent application of the regulations.</li> <li>4. Our unique street and laneway patterns in St. John’s provide the special context for our built heritage to remain one of a kind in Canada. I believe that the spaces between our heritage properties are as important as the buildings themselves. Strong protection for this infrastructure is critical in our overall heritage preservation strategy.</li> <li>5. There are far too many examples where developers or single residents have been allowed to take possession (either with or without permission) of a street or laneway for their own benefit and at the expense of the general public. The results typically dilute the continuity of our heritage. Street and laneway patterns themselves constitute an integral part of our heritage areas and deserve to be preserved.</li> <li>6. We are disappointed with an apparent lack of consideration for how the proposed amendments fail to examine heritage in a broader context. Cultural heritage is more than celebrating and protecting built heritage: It is all aspects of a community’s past and present that it considers valuable and desires to share with future generations. We feel strongly that the City of St. John’s has a responsibility to consider a broader definition of heritage before adopting a revised version of the existing by-law. The proposed amendments present an opportunity to consider heritage under a broader lens, including but not limited to street names, monuments, parks and green spaces while ensuring that colonial values and meanings are not favoured over Indigenous Cultural Heritage.</li> </ol>
Heritage By-Law Public Engagement	<ol style="list-style-type: none"> <li>1. Many people feel that the Heritage By-Law is being rushed and that further engagement is required. They have concerns that there have been multiple consultations for the Envision documents, but only recent ones for the Heritage By-Law.</li> </ol>



**Concern**

**What We Heard**

**Inspector**

1. There seems to be no requirement for the inspector to consult with the Committee or to even review other documents.
2. What qualifications, training and oversight will Inspectors have for making decisions about design standards. The Act should specify when the Inspector will be required to consult with the City Planning Department.
3. These inspectors should be required to undertake the full 5-day training related to Standards and Guidelines for Historic Places in Canada.
4. The Heritage By-Law gives a significant amount of power and control to the Inspector. The inspector has the deciding power to approve nearly every design element which may be in contravention to the Design Standards which include windows, doors, trim, roofs, cladding, dormers etc. without ever referring to the Heritage Advisory Committee. The inspector must be trained, qualified, and have experience in the heritage field to make appropriate decisions to protect the built heritage of the city.
5. The city no longer specifically designates heritage building inspectors. We recommend ongoing, proactive heritage training for all staff responsible for enforcing the provisions of the By-Law. Heritage NL would be happy to work with the city to facilitate this training.

**Built Heritage Experts Panel (BHEP)**

1. Consider requiring an engineer on the Committee to help identify potential structural or infrastructure conflicts.
2. Council should not have moved away from the Heritage Advisory Committee. There should be a Council member on the committee.
3. Heritage also includes visual/cultural aspects, not just built heritage. The committee should have equal representation of historians, in addition to the built heritage experts (contractors, architects, landscapers, urban planners). The less tangible portions of the City's history need equal protection under this By-Law. The historian should be an expert in NL history.
4. It is time to add a member from general public who can represent the interests of residents who live in designated Heritage Areas.
5. The architect should have experience in restoration/renovation of NL heritage buildings and Districts, plus knowledge of Standards and Guidelines for development of such properties.
6. Qualifications of Experts should be of the highest caliber, chosen for merit. Wider advertising needed to attract experts.
7. It is noted that Panel can strike sub-committees for special issues, to include members of public, or organizational representatives, to better inform their decision-making when deemed necessary. Who makes this decision and what is process for Public to communicate within the Panel?
8. Has Staff interviewed Panel members both past and present, to see what their views may be as to how we may re-create this heritage advisory committee to be the best in Atlantic Canada and serve as a model for other jurisdictions.

**Concern**

**What We Heard**

**Heritage Areas**

1. **Statements of Significance should be developed for each of the city's existing and proposed heritage areas to ensure continuity in decision making and clarity on the rationale for heritage protection.**
2. **Once the new bylaw is adopted, I would recommend that the City consider further expansion of heritage areas, there are parts of Churchill Square, that I'm sure could warrant such a designation to preserve the mid-century era, as well as part of Waterford Bridge Road, Winter Avenue, etc. The boundaries of the Heritage Areas are very sporadic and could use re-evaluation for cohesiveness.**
3. **There is a lack of recognition in the By-Law and design guidelines of the importance of the cultural landscape of the designated heritage areas. The Harbour from the waterfront up to and including the Ecclesiastical District in St. John's, is its cultural landscape. While the draft By-Law provides extensive detail on the individual buildings, it does not secure this landscape in any way and in ways is leading to its devastation.**
4. **The Grand Concourse walking trails should be considered a Heritage Area so they're not paved over and ruined.**
5. **Ensure the public is aware of the designated heritage areas, and the standards associated with renovations of homes and properties within those areas.**
6. **The City of St. John's should embark upon establishing a built heritage inventory to identify buildings of architectural and cultural value.**

**Heritage Area 4 – The Battery**

1. **Residents feel that Heritage Area 4 (The Battery) should include all of Signal Hill Road, Walsh's Square and Battery Road. These streets have been considered part of the Battery in studies undertaken by the City. They fear over time, the streetscape on one side of Signal Hill/Battery Road would evolve into something quite different than the other.**
2. **Some felt that the Battery is at risk with the introduction of large buildings and that the traditional design should conform on all four sides. They feel huge homes in these historic areas completely destroy the historic, cultural, aesthetic and natural elements of the area. The proposed measures are a start but doesn't sound like they will go far enough.**
3. **Abandoning the protection of private views, however, will counteract the City's vision and put the architectural heritage and beauty of the Battery at risk. If the new regulations regarding height are implemented while abandoning the protection of private views this inevitably implies that the streets of the Battery will eventually be lined with 6 metres high buildings on the harbourside and 9 metres high buildings on the hillside. In other words, one-storey buildings will largely disappear and be topped up or replaced by two-storey and three-story homes. This would of course heavily affect the special, irregular beauty of the neighbourhood and its iconic view from the harbour. Moreover, it would erode the architectural heritage of the Battery as a fishing village and counter the City's efforts to preserve that heritage as expressed by the inclusion of wharves and stages in the list of discretionary uses.**

Concern	What We Heard
National Historic Districts	<ol style="list-style-type: none"> <li>1. The definition of our Historic District should be defined in the Heritage By Law along with a statement of each Historic District's Historic Value.</li> <li>2. Recognition of the Ecclesiastical District is absent from both Envision and the By-Law. The City should work with property owners within the Ecclesiastical District to formulate both a management plan and additional protective measures going forward. Further, we recommend that consideration be given to including all National Heritage Districts in the By-Law and developing management plans and additional protective measures.</li> <li>3. The Ecclesiastical District should have its own stand-alone Development Zone in the City of St. John's and recognize it in the proposed new Heritage By Laws. This zone should describe the architecture, protect view planes, only allow complimentary developments, recognize the requirements of the churches and their programming and parking requirements, and require consultation with heritage experts and historians.</li> </ol>
Heritage Buildings and Designations	<ol style="list-style-type: none"> <li>1. Section 5 (1), (2) - By itself, this appears to give council authority to designate or revoke without reference to the Committee or the general public. Perhaps you need to add "subject to requirements for heritage reports and Committee input as outlined in Section 8 etc." Or words to that effect.</li> <li>2. The City of St. John's should formally recognize the designations of heritage places by other levels of government within its jurisdiction</li> <li>3. My wife and I own a designated Heritage Building and have read the draft word for word, especially the section about residential buildings. As owners, we found this to be both useful and constructive, especially for anyone considering the seemingly endless maintenance of buildings. The descriptions of what to strive for, and what will be expected, is really essential.</li> </ol>
World Heritage Site Designation	<ol style="list-style-type: none"> <li>1. The Heritage By-Law should reference the fact that some districts in the City may be eligible for a World Heritage designation. UNESCO's standards and Best Practices for the conservation of these places would be administered by the City and therefore the By-Law should reference that such a designation requires the development of a management plan completed in partnership with Parks Canada, property owners, associated stakeholders and the City.</li> </ol>

**Concern**

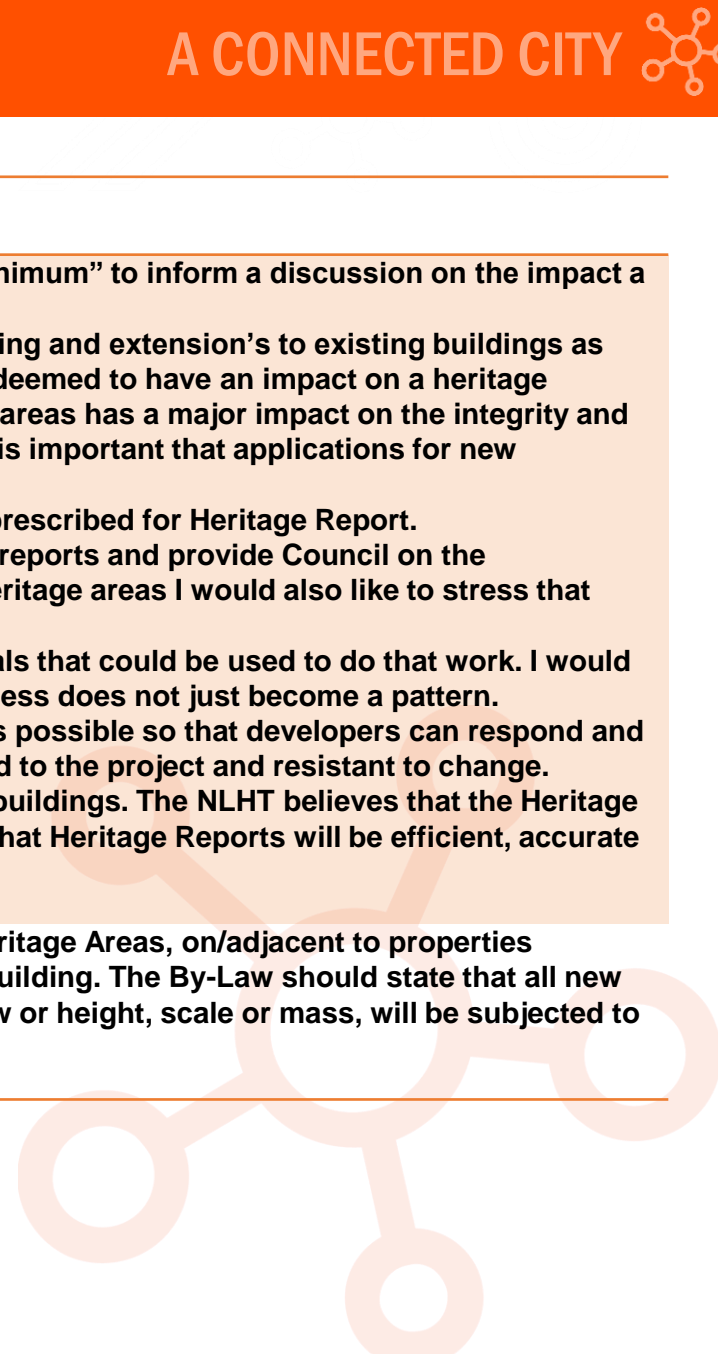
**What We Heard**

**Demolition**

1. The following steps should be required for demolition applications for places, designated of provincial, national as well as municipal historical importance in the City, and should be embedded in the new Proposed Heritage By Laws.
  - a) A demonstration of how the conservation of the building could be undertaken.
  - b) A demonstration of how the property can be sensitively repaired with sympathetic heritage materials.
  - c) A demonstration of options for the reuse of the building without alterations or demolition.
  - d) A demonstration of what adaptive reuse options have been explored for the historic property.
  - e) A demonstration of how original features could be reinstated.
  - f) A demonstration they are aware of cost share funding for the above-noted items from various government agencies.

Only if and when the following analysis and steps have been taken should the City entertain a Demolition Report
1. The City of St. John’s should add a requirement to document any historic building prior to demolition. When considering accepting a demolition as the last option I recommend the following:
  - a) A recording of all the exterior and interior envelope including foundations and any associated cultural landscape features such as fencing, gates, monuments walls or any other cultural landscape features and historic vegetation.
  - b) The name of the architect associated with the building, if appropriate and their significance
  - c) The architectural style associated with the building, historic landscape or historic district
  - d) The name of the builder and his significance
  - e) The name of the craftspeople who contributed to the historic building, historic landscape or historic district and their significance
  - f) The municipal, provincial, national and international historic designations associated with the building, cultural landscape or historic district
  - g) The history and historical figures associated with the historic building and or the historic landscape, streetscape or district and their local, provincial, national and international importance.
  - h) The historical events of local, provincial, national or international significance associated with a historic building, a historic landscape or a historic district.
2. Documentation should be completed by a competent, trained, and qualified individual.
3. The Heritage By-Law should require or encourage the salvage and reuse of historic material from such buildings.

Concern	What We Heard
Heritage Reports	<ol style="list-style-type: none"> <li>1. The minimum requirements listed in this section for the Report are far too “minimum” to inform a discussion on the impact a development in any heritage area.</li> <li>2. Add new buildings, development adjacent to a Heritage Area or Heritage Building and extension’s to existing buildings as section 8(c). Heritage Reports are required under the By-Law for applications deemed to have an impact on a heritage building, neighbourhood or district. Construction of new buildings in heritage areas has a major impact on the integrity and the special ambiance and attraction of designated heritage areas. Therefore it is important that applications for new buildings not be exempted for the requirements for a heritage impact report.</li> <li>3. Section 8.3- If staff undertake a report they should follow same guidelines as prescribed for Heritage Report.</li> <li>4. I do not think that staff reports should be substituted. Staff should review the reports and provide Council on the completeness of the work. To protect the visual and historic integrity of our heritage areas I would also like to stress that Heritage Reports should not be waived under any circumstances.</li> <li>5. Council should maintain a list of qualified and acceptable heritage professionals that could be used to do that work. I would encourage Council rotate through the possible authors to assure that the process does not just become a pattern.</li> <li>6. The Heritage Reports must be received as early in the development process as possible so that developers can respond and incorporate the content into their LUAR before becoming financially committed to the project and resistant to change.</li> <li>7. Heritage reports should also be required when additions are made to historic buildings. The NLHT believes that the Heritage By-Law must contain information on content, qualification, and time scale so that Heritage Reports will be efficient, accurate and appropriately protect the built heritage of the City.</li> </ol>
Public Consultation	<ol style="list-style-type: none"> <li>1. Public consultation should be required for new buildings in/adjacent to the Heritage Areas, on/adjacent to properties containing Heritage Buildings and substantial alteration of existing Heritage Building. The By-Law should state that all new buildings and extensions to existing buildings that impact any street-level view or height, scale or mass, will be subjected to public consultation.</li> </ol>



## Concern

## What We Heard

### Heritage Design Standards

1. **Roof Decks** – there have been mixed submissions regarding roof decks. Some believe that roof decks should not be permitted on any Heritage Area 1 building, while others feel that with properties with sometimes small backyards, roof decks should be permitted under certain conditions to allow enjoyment of the property. Businesses have indicated that roof decks should be considered in the Water Street and Duckworth Street areas, regardless of their Heritage Area.
2. **Window materials** - I believe that whenever possible, original or replica wood frames should be retained, in commercial and residential buildings. Wood frames greatly improve the heritage integrity of a structure and should be retained at all reasonable cost. A category for window divisions (mullions, grilles, etc.) should be added to the Design Standards. Far too often, windows are being approved despite having divisions of an incorrect architectural style or period.
3. **Green Roofs, Metal Roofs and Solar Panels**- The installation of green roof systems and solar panels will hopefully become more prominent in the future. Innovation in our City should be encouraged, not restricted by regulation. Particularly, green roof systems are installed on a flat roof and would not be visible from the street. They are particularly effective in reducing stormwater runoff and plants are much nicer to look at than a modified bitumen roof. I believe the wording in the standards should be modified to encourage rather than discourage green roof systems. Solar panels should also be encouraged and the wording in the Standards could be similar to the wording used for heat pumps. Metal roofs should be permitted on Heritage Buildings because in some cases metal may be the traditional material.
4. **Garage Doors** - I am not a big supporter of garages in the heritage areas anyway. It is good that specification say “should not be the prominent feature on the building’s façade facing a public street and/or publicly maintained space”. This will be hard to achieve.
5. The current by-law is silent on control of new development. The design standards which are detailed and strict for existing heritage buildings, allow for virtually blanket exemptions new development. The standards should also include a clause that modern architecture be allowed which respects rather than copies heritage detailing and which can be reviewed on a case basis.
6. The standards do not reflect the types of architecture and the architectural details associated with the Ecclesiastical District.
7. The standards should not allow replication of previous heritage buildings. Replicating heritage buildings should be encouraged with the use of archival, photographic and oral history information.
8. **Modern design** must be defined for the architects. This must include statements that it must be visually compatible to the existing Heritage Architecture and subordinate to the Historic Structures it will sit amongst Modern design, as Architects will define it, is not appropriate under any circumstances for our heritage districts and especially for the Ecclesiastical District. The definition of modern architecture must also state that no overhangs or phallic looking designs will be allowed in the district or in their view planes.



**Concern**

**What We Heard**

**Heritage Design Standards  
(continued)**

9. The By Laws should also include a statement that no renovation or new development can harm an adjacent heritage structure or its foundation and proponents will be required to have permission of adjacent owners and apply mitigating measures at the proponents expense to protect adjacent properties when such damage is possible.
10. The city should revoke the ban on historic mansard and steeply pitched roofs in the battery area and instead ban modern shed roof styles which have lately been approved and constructed.
11. The requirement for corner boards of 15 cm (6 inch) width should also be altered. This requirement is misleading as many existing historic buildings feature corner boards which are far wider.
12. The design standards for harbour facing windows applicable for the Battery is a great improvement but it should be expanded to all heritage areas.
13. Provide clear criteria in the design guidelines for new buildings and extensions to existing buildings in heritage areas as to how they can “blend in with the surrounding buildings and neighbourhoods.
14. It is recommended to define terms including “compatible,” “replicate,” “specialty,” and “character defining elements” using language based in conservation theory and the Standards and Guidelines for the Conservation of Historic Places in Canada.
15. The business community recommends that the City complete a study on how buildings in the Heritage Areas can become more accessible.
16. The business community also requests that the By-Law ensure predictability in development applications.

**New Developments**

1. There are major concerns from the public regarding some of the proposed exemptions in the Heritage By-Law. Section 9 (3) of the By-Law states that Council can exempt newly constructed building in a heritage area from the design standards. This will undermine the investment in the conservation or adaptive reuse of existing buildings. It can also encourage demolition by neglect of historic properties. This is a means for developers to contravene heritage area rules and restrictions. with no stated restrictions or limits.
2. There have also been many concerns raised regarding the flexibility to relax the standards above 18 m where the building is required to step back. Allowing top hat tall buildings designs on the basis that the streetscape view will be protected may work in a flat landscape in Toronto and where buildings are not in a heritage district, but this approach will not work in our terraced landscaped heritage districts.
3. The exemption for new taller buildings is unfair to owners and investors who comply with the heritage design guidelines. It will undermine confidence that there will be fair and consistent application of the heritage regulations to protect their investment
4. Allowing tall building new developments in heritage areas without public input is simply undemocratic and detrimental to citizens and adjacent property owners who have legitimate needs and issues that Council also has a responsibility to address and protect.



**Concern**

**What We Heard**

**National Guidelines and Standards**

1. Many recommended adoption of The Standards and Guidelines for the Conservation of Historic Places in Canada as the official standards and guidelines for planning, stewardship and conservation of heritage resources within the City of St. John's. City staff, members of the Heritage Advisory Committee and interested councillors and stakeholders should be provided with training on the use of the Standards and Guidelines. Such training is available by request to Parks Canada's Historic Places Initiative. In a review of municipal heritage programs we found St. John's to be one of just two sample Canadian cities not to adopt the Standards and Guidelines in any way. We therefore see this recommendation as a starting point. It is important to note that the Standards and Guidelines are not prescriptive and would place no additional requirements on property owners.

**Building Height and Density**

1. An accepted best practice for heritage area conservation is the control of height and density. The Municipal Plan identifies the area West of Adelaide Street as most appropriate for High Rise Development but allows for increased height and bulk in areas to the East where high-rise developments have the greatest impact on the heritage character of the area. This is a serious loophole which could have a very damaging impact on this important designated historic district. Retain the existing 4 story height limit for new building in heritage areas.
2. I understand that only the "appearance" of a building is controlled by the Heritage By-Law and the height and density is controlled by development regulations. That appears to me to be a serious disconnect between the municipal plan and the regulations.
3. Predetermine in which area of planning area 1 intensification may occur and under what circumstance.
4. We do not need to plan for yesterday's cities and we in St John's we do not need to increase density in the area that is already the densest; and certainly we do not need to negatively impact our heritage districts and associated industries in the process. Council should be looking to save every bit of green and open space it can.
5. Soft intensification should be continued to be encouraged for our heritage districts where existing heritage buildings can be turned into condominiums and apartments.
6. Stricter measures on height and scale need to be part of Heritage Areas - so that new developments do not undermine the unique physical and cultural landscapes of the designated heritage areas.
7. Exemption for owners of a new buildings "Council will maintain the ability to exempt the owner of a new building from the Heritage design standards. "(which includes HEIGHT)

Concern	What We Heard
Zoning	<ol style="list-style-type: none"> <li>1. The Development Regulations must only allow low density development zones in heritage areas including the Ecclesiastical District. The Ecclesiastical District should not be exposed to medium or high-density zoning when applicants come forward to supersize existing zones such as open space zones. This restriction should be outlined in the new proposed by-laws.</li> <li>2. The Heritage By-Law should override allowing zoning changes and heritage districts should be detached from the Act that authorizes the City's Development Zones.</li> <li>3. Site Specific Zones to meet a developer's design should also be disallowed in heritage areas including the Ecclesiastical District.</li> <li>4. The proposed "(High Density)" Institutional Downtown Zone for the Churches of the Ecclesiastical District is unnecessary. None of the interiors of the church buildings are more than 4 storeys. The proposed height of 23 meters or 7 storey capability is unnecessary and completely out of proportion to these significant architectural masterpieces, built by some of the worlds great architects of their day. I therefore strongly request a lower density Zone for this District be applied or developed.</li> </ol>
Property Maintenance	<ol style="list-style-type: none"> <li>1. Property owners can neglect a known heritage property until it is no longer worth saving, or able to be saved. These kinds of cases will lead to the ultimate loss of many important heritage properties in town, and something that we, as heritage professionals, should be working against. We have to ensure that the new bylaw will help to mitigate the slow destruction of heritage properties for the future.</li> </ol>
Heritage Grants	<ol style="list-style-type: none"> <li>1. The City's Heritage Incentive Program requires a contract with the City and places a lean on their property citing that it was a real deterrent to applying for a heritage grant.</li> </ol>

