CITY OF REGINA
HERITAGE BUILDING REHABILITATION PROGRAM REVIEW

Final Report December 2021

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TABLE OF CONTENTS

1. INTRODUCTION

This report will assist the City of Regina in the utilization of realistic and effective heritage incentives, regulations and procedures that will promote the conservation of historic resources throughout the community. A broad range of incentive and regulation-based heritage tools will form an important step in the proactive management of the City's significant resources, as administered through the Heritage Building Rehabilitation Program (HBRP).

Heritage can be defined as anything of a physical, cultural or social nature that is unique to, and valued by, a community, and can be passed from generation to generation. Heritage is important for a number of reasons. Each municipality's heritage is distinctive, and therefore can help instill a sense of community identity and resident pride. It promotes a sense of continuity for residents and an understanding of where we have been and where we are today. As such, key resources should be conserved for future generations to enjoy and benefit from. Heritage conservation is also important economically; it can increase property value and provide opportunities for business, property owners and tourism.

The value of conserving heritage properties is not always immediately recognized, especially if there are perceived financial benefits from demolition and/or redevelopment. Municipal heritage programs should balance regulations and incentives, based on owner cooperation; in virtually all cases, heritage protection is achieved on a voluntary basis. Where there are external pressures threatening heritage assets, it has been recognized that more effective conservation will be achieved through incentives rather than by stringent regulation.

Compensation may be required for loss of economic value when continuing protection is enacted; in lieu of compensation, an incentives package that is acceptable to the property owner can be offered. This is the primary means by which continuing protection is secured for heritage sites. Incentives also help ensure long-term conservation, by ensuring that each project is, and remains, financially viable.

It is in the best interest of both the public and the municipality to avoid the stigma of "unfriendly designation" and the negative impacts (financial and otherwise) that accompany the use of rigid controls to conserve heritage sites. An extreme example of an unfriendly designation occurred in Victoria when the City designated the interior of the Rogers' Chocolates building against the wishes of the owner; an arbitration ruling found the City liable for substantial compensation and legal costs. This illustrates the reluctance of municipalities to enact any form of protection against an owner's wishes.

Instead, incentives-based, voluntary and cooperative Heritage Programs are best practice. If possible, regulations should not be forcibly imposed on owners; rather, heritage projects should be approached in a way that will ensure there are benefits for the applicant. This approach is supported by offering incentives that result in renewed investment in heritage properties, plus satisfaction and benefits on all sides.

In order to conserve significant heritage sites for future generations, the City will need to work cooperatively with owners to achieve the public goal of heritage conservation. As outlined in this report, there are a number of procedures, techniques and tools available to achieve this overall goal.

2. BENEFITS OF HERITAGE CONSERVATION

Heritage conservation has many potential cultural, social and economic benefits. Conserving and celebrating a community's heritage allows it to retain and convey a sense of its history and provides aesthetic enrichment as well as educational opportunities. Heritage resources help us understand where we have come from so that we can appreciate the continuity in our community from past to present to future. Historic sites become physical landmarks and touchstones, and many other intangible heritage features - such as traditions, events and personal histories - add to the City's vibrancy and character. This broad range of heritage resources represents a legacy that weaves a rich and unique community tapestry.

Cultural and heritage-based tourism, including visits to historic sites, is among the fastest growing segments of the overall tourism industry. Other benefits of strong heritage policies include maintaining distinctive neighbourhoods, conserving cultural heritage, strengthening community identity and promoting civic pride. Heritage conservation is also inherently sustainable and supports initiatives such as landfill reduction and conservation of embodied energy. It reinvests in existing infrastructure and promotes avoided impacts through reduced greenhouse gas (GHG) emissions. These are all important considerations in the long-term management of our built environment.

The benefits of a well-managed heritage conservation program include:
- retention of unique community heritage
- celebrations of historical events and traditions
- partnership opportunities with senior levels of government
- engagement of the broader community including the private and volunteer sectors
- conservation of a broad range of historical sites that supports other public objectives, such as tourism development and education
- flexible heritage planning that assists private owners in retaining historic resources
- investment in heritage sites through community partnerships
- generation of employment opportunities and other economic benefits
- linkages with goals for greener community development and sustainability initiatives

Heritage initiatives provide many tangible and intangible benefits and have a strong positive impact on the development of a complete community and the emergence of a vibrant culture of creativity and innovation. There is, however, a widely-held perception that protecting heritage property reduces property values or inhibits development. Studies have shown that this is not so; Professor Robert Shipley of the University of Waterloo looked at almost 3,000 properties in 24 communities across Ontario between 1998 and 2000. His study concluded that heritage designation could not be shown to have a negative impact on property values.

In fact, there appears to be a distinct and generally robust market in protected heritage properties. Generally, these properties perform well, with the majority of them maintaining their value at average or better than average market value. The rate of sale among designated properties is also as good, or better than, average market trends. Moreover, the values of heritage properties tend to be resistant to downturns in the general market.

The Vancouver Heritage Foundation undertook a research project to determine whether there were positive or negative impacts to heritage designation, through a comparison of the assessed values of heritage and non-heritage properties in four Vancouver neighbourhoods (Strathcona, Kitsilano, Mount Pleasant and Hastings Sunrise). The study found that between 1999 and 2005, Heritage Register and designated heritage houses increased in value by 42%, while non-heritage houses increased in value at a slightly lower rate of 39%.

The Victoria Heritage Foundation tracked the market values and assessments of 142 heritage houses designated prior to 1988. Between 1988 and 1999 the tax assessments for these individual designated (and well-maintained) heritage houses increased at a rate 26% higher than the average tax assessments for residences throughout for the City. This resulted in an increased tax return to the City as a result of the heritage incentives that were provided.

The experience of these two heritage foundations indicates that when incentives are available, the property values of heritage houses rise at a higher rate than normal building stock, therefore providing higher assessments and ultimately increased property taxes. This is a desirable outcome for the municipality, which reaps the downstream benefits of this investment in heritage conservation. The same is true for tax incentives, which can be used to stimulate investment in under-utilized properties that will ultimately pay higher property taxes. Heritage conservation initiatives provide stability in the marketplace and helps protect property values. This is especially true when conservation incentives are offered, creating a category of prestigious properties that are highly valued in the marketplace.

In general, heritage incentives leverage many times their original value in owner investment, construction and job creation. In addition to being a sound community investment, they are a sound financial investment for the City.

3. BEST PRACTICES

3.1 Global Heritage Conservation
Examples of the best practices for heritage conservation can be found across the world in various principles and charters and throughout the initiatives of many different levels of authority. Similar to other cultural sector activities, heritage conservation follows a tiered organizational system, beginning at the global scale; UNESCO (United Nations Educational, Scientific and Cultural Organization) and ICOMOS (International Council on Monuments and Sites) provide the fundamental standards of heritage conservation, which are intended for adoption by individual countries. Canada is a signatory state to these protocols. According to UNESCO, there are a number of measures that governing bodies can undertake in order to ensure that the conservation of heritage sites, which contribute to authentic local identity, is incorporated into legislation:

- All official plans must provide for heritage conservation.
- Every government should empower an entity to advise it on endangered heritage property.
- Heritage protection should be binding on government agencies.
- Public agencies should orient their construction policies to renovating space in old buildings.
- Cultural Landscapes should be subject to protection.
- The areas around historic places should be subject to rules ensuring harmonization.
- Groups of modest buildings that are collectively of cultural value should be protected even if no individual one is noteworthy.
- There may be a *quid pro quo* for designation.
- Any policy for protection must be accompanied by a policy for revitalization.
- Owners of historic places should be encouraged by means of tax incentives.
- Governments should establish either special subsidies or a national conservation fund outside the normal budgetary process.
- Governments should make grants, subsidies, or loans available to municipalities, institutions, and owners to bring the use of historic places up to contemporary standards.
- A system should be established with public and private sector participation to provide rehabilitation loans with low interest and/or long repayment schedules.
- Rehabilitation projects should observe modern safety standards, but when building and fire codes interfere with conservation, alternate compliance should be considered.

3.2 The Canadian Context
Canada has had a rich history of heritage conservation, despite its relatively young age. The heritage movement in Canada began prior to the advent of World War One, out of the concern for the condition, and future, of some of the country's earliest buildings. In 1919, the Historic Sites and Monuments Board of Canada was established. The development of the *Historic Sites and Monuments Act* followed in 1953. The *Act* was the first federal legislation created to allow the national designation of Canadian buildings, however, the *Act,* although supporting research and recognition of historic resources in Canada, does not provide any *legal* protection to heritage sites.

Modern Canadian heritage planning is based on two primary tools: the Canadian Register of Historic Places and the Parks Canada *Standards and Guidelines for the Conservation of Historic Places in Canada,* both of which were originally developed under the Canadian Historic Places Initiative (HPI). Started in 2001, the HPI was formed through intergovernmental collaboration (between municipal, provincial, territorial, and federal levels of government) in order to establish a pan-Canadian culture of conservation. The Statement of Significance (SOS) tool, implemented as part of the HPI, remains the primary method of conveying the heritage value of Canadian historic sites across the country. Though the third tier of the HPI, the certification program for incentives, was never fully enacted, the *Standards and Guidelines* and Statement of Significance documentation remain Canadian best practice.

3.3 The Provincial Context
When the *Cities Act* came into force in January 2003, all cities in Saskatchewan were granted the option to operate either under the *Cities Act* or under the *Urban Municipalities Act*; all cities opted to operate under the former rather than the latter. This *Act*, Chapter C-11.1 of the *Statutes of Saskatchewan,* provides the broad framework of governance for the City of Regina, but does not specifically mention the management of heritage sites.

Authority for the management of heritage sites is enabled under *The Heritage Property Act*. This *Act* grants municipalities the authority to provide tax relief or other incentives to heritage properties. The *Act* also enables, but does not compel, the City to appoint a Municipal Heritage Advisory Committee (MHAC). The *Act* states that Council should consult with the MHAC, if one has been established, prior to designating a property or demolishing a designated property.

The Saskatchewan Heritage Conservation Branch is the steward of many diverse historic resources throughout the province. The Built Heritage Management Unit focuses on provincial heritage property designation and alteration review and approvals, municipal heritage property advisory and registry services, community engagement to build local heritage conservation and management capacity and managing the Saskatchewan Register of Heritage Property. The Archaeological Resource Management Unit focuses on land and resource development review, impact assessment and mitigation, investigation permitting, managing the Saskatchewan Archaeological Site Inventory, and geographic place naming. In addition, the Heritage Conservation Branch is responsible for providing administrative and technical support to the Saskatchewan Heritage Foundation and its various standing committees, including the Saskatchewan Heritage Advisory Committee, the Saskatchewan Heritage Property Review Committee, and the Saskatchewan Geographic Names Committee.

3.4 Municipal Heritage Programs
Though no one municipal program is *perfectly* comparable to the Regina context, there are components of a variety of programs, which have been studied by both the consultant team and City Staff, that can be used to inform and improve Regina's Heritage Building Rehabilitation Program.

The City of Saskatoon's municipal heritage program offers a somewhat direct comparison to Regina.
- **Register of Historic Places:** created in 2014, but with roots in the 2004 Built Heritage Database, the register is a collection of historic resources that are recognized and protected at the Federal, Provincial, and Municipal level, and additionally contains recognized, but non-designated sites; the three-part Statements of Significance for each site are available online on the City's website; nearly 200 sites are included on the register
- **Planning and Regulatory Tools:** include the Municipal Heritage Advisory Committee, which works on behalf of City Council in reviewing any changes to criteria to the evaluation of resources, and additionally reports to Council matters of heritage via the Planning and Operations Committee; Bylaw No. 6770, passed in 1987, and more commonly known as the Holding Bylaw, prevents demolition of listed properties in the bylaw for 60-days following the initial application of the demolition permit; the City's Heritage Coordinator promotes the implementation of heritage strategies based on the *Heritage Policy and Program Review*; the *Civic Heritage Policy* of 2014 helped broaden the role of the municipality in the conservation of the historic resources in the city by instituting definitions of heritage and policy direction; it was further augmented by the *Saskatoon Heritage Plan*, providing a long-range plan and support mechanisms for conservation
- **Incentives**: are available both financially and non-financially; in cases where conservation interventions are expected to result in an increase in property taxes, property tax abatements are covered up to 50% of the costs of the project (up to a maximum of $150,000); when property taxes are not expected to increase, or for tax-exempt properties, grants covering up to 50% of conservation work (up to maximum of $150,000, or $75,000 for tax-exempt

properties) are available; additionally, the City provides maintenance grants and permit refunds (up to 50% of fees related to eligible project costs for designated properties), and will also support owners of historic resources through the offering of alternative building code compliance mechanisms, as well as the potential rezoning for adaptive reuse; for commercial properties located within Business Improvement Zones, Façade Conservation & Enhancement Grants are also available

The City of Calgary has a comprehensive heritage program with a focus on the identification, evaluation, and awareness of heritage sites, demonstrated by the broadness of sites on the Inventory of Evaluated Historic Resources, the public availability of information pertaining to evaluated resources, and the biannual municipal heritage awards. Recently, the City has embarked on a number of conservation projects on publicly owned resources, setting a precedent for future conservation endeavours in the city.

- **Inventory of Evaluated Historic Resources:** is a list of sites that have been evaluated by municipal heritage planners, community members, and/or consultants; the Inventory contains more than 800 resources, though sites that have been demolished are kept as active entries on the list; the City has instituted a values-based, non-numerical custom-evaluation form, which includes a Statement of Significance and a Statement of Integrity
- **Planning and Regulatory Tools:** the City is guided by the 2008 long-range planning report, the *Calgary Heritage Strategy*; the *Strategy* provides recommendations on incentives and processes for the municipal heritage planners and administration
- **Incentives:** for Municipal Historic Resources, the City provides grants for conservation projects up to 50% of the costs (up to a maximum of 15% of the assessed property value); these grants are only available for an individual property every 15 years; municipally designated sites are eligible for a cost share grant through the provincial Heritage Preservation Partnership Program

The City of Edmonton has a robust heritage program with an emphasis on predictability and marketability, offering sustainable and attractive incentives to its citizenry to encourage conservation, including:

- **Heritage Register:** provides valuable information on each building, including date of construction, architect, owner, etc.; more than 700 properties are listed, including more than 100 that have been designated
- **Planning Tools:** the City of Edmonton incorporates heritage conservation into its overall planning framework; it has also developed several plans and policies to manage heritage sites and development growth directly, including: *Historical Resources Management Plan*; City Policy C-450B: *A Policy to Encourage the Designation and Rehabilitation of Historic Resources in Edmonton*; *The Art of Living*: a plan for securing the future of arts and heritage in the City of Edmonton; and *The Way We Grow,* a development plan
- **Incentives:** include a fund to provide financial compensation for the designation of Municipal Historic Resources and the continued, long-term maintenance of designated resources; direct grants; property tax rebates; and non-monetary incentives

The City of Vancouver Heritage Conservation Program boasts a diverse program that offers a wide range of management tools and conservation incentives, including:

- **Heritage Register**: more than 2,200 sites are listed, including buildings, structures, streetscapes, landscape resources and archaeological sites
- **Neighbourhood Planning:** incorporates heritage zoning districts, zoning guidelines, and community planning projects
- **Protection Measures:** include legal designation; changes to designated heritage sites administered only through Heritage Alteration Permits

- **Incentives:** include a new program with an expanded budget, as well as individual application streams, such as the Transfer of Density program; the Heritage Building Revitalization Program; and Heritage Revitalization Agreements
- **The Vancouver Heritage Foundation (VHF):** manages a recently expanded granting program geared towards residential properties and provides a wide variety of programming focused on heritage awareness and education

The City of Victoria offers a marketable and predictable program, which encourages active participation and buy-in from Victoria residents. The salient program components include:
- **Planning and Regulatory Tools:** including the Heritage Register (listing approximately 1,100 historic sites); Heritage Inventory; use of Heritage Alteration Permits; *Heritage Strategic Plan For The City of Victoria*; the creation of 13 heritage conservation areas (HCA); and the *Official Community Plan*, which has adopted the *Standards and Guidelines for the Conservation of Historic Places in Canada*
- **Incentives:** including the House Grants Program; the Building Incentive Program; the Tax Incentive Program for Downtown Heritage Buildings; and the Illuminate Downtown Grant, offered by the Downtown Victoria Business Association
- **Education:** heritage conservation is promoted through various organizations across the city including the Victoria Heritage Foundation, the Victoria Civic Heritage Trust, the Hallmark Society, the Victoria Historical Society, and the Old Cemeteries Society; as well as the publication of *This Old House: Victoria's Heritage Neighbourhoods*

The City of Toronto offers a predictable, diverse, and marketable heritage program with a focus on neighbourhood character and the creation of sustainable heritage conservation districts. Tools include:
- **Heritage Conservation Districts:** HCDs allow City Council to administer guidelines designed to protect and enhance the special character of groups of properties in an area; the character is established by the overall heritage quality of buildings, streets and open spaces as seen together; Toronto has sixteen Heritage Conservation Districts
- **Heritage listing:** there are approximately 9,000 properties identified, including 4,500 that have been designated
- **Heritage Easement Agreements:** identifies elements of a building which are to be retained in perpetuity and may also set out permitted alterations and development.
- **Financial Incentives:** including the Toronto Heritage Grant Program and the Heritage Property Tax Rebate Program

The City of Montreal offers a very diverse program, due to its broad definition of 'heritage' and its focus on intangible heritage, in particular. The most significant components of the Montreal program include:
- **Planning and Regulatory Tools:** surround Tangible Cultural Heritage (including public art, archaeological heritage, archival heritage, and built heritage); Moveable Heritage (including artistic, archaeological, documentary, ethno-historical and scientific collections – as well as landscaped heritage); Intangible Cultural Heritage (including traditions, arts, knowledge, and memory – also referred to as 'living heritage')
- **Incentives:** include restoration education, grants, home ownership assistance, and minimum maintenance standards (which are provincially mandated, defining the failure to adequately maintain a designated heritage property as an 'offence')
- **Education Tools:** Urban Heritage Interactive Publications, which provide tools, tips, and strategies to help owners take care of Montreal's Urban Heritage

After reviewing these municipal heritage programs across Canada, certain heritage planning practices were analyzed for their potential applicability to the City of Regina. Although they respond to many different factors including different legal frameworks, these municipal programs provide lessons and

aspirational examples of potential policy directions for Regina. In general, the most successful municipal heritage programs include several key elements related to incentives:

- **Predictability:** successful programs have proven to be reliable, sustainable, and predictable over time. In order for the program to be effective, applicants need to trust that the incentives and tools on offer will remain available and constant through the duration of their project, and beyond.
- **Diversity:** a combination of incentives (both financial and non-financial), planning and regulatory tools, and public education should be available in order to engage the greatest number of users and protect the most historic places.
- **Versatility:** due to the ever-changing and evolving nature of heritage conservation, as well as the broadening definition of what constitutes an 'historic place', a successful program must be adaptable. Programs are considered versatile when they offer applicable and desirable incentives and recognition tools for a wide range of sites, as well as remaining flexible regarding emerging technologies, conservation techniques, program information management, and education and awareness initiatives.
- **Marketability:** the components of a heritage conservation program must be relevant and desirable to the local community; for example, over-size and out-of-scale infill or additions may not be appropriate in sensitive heritage areas. A heritage conservation program should be tailored to the local context, recognizing development and market trends and responding to the changing needs of communities.

4. PROGRAM VISION AND GOALS

4.1 A Renewed Vision for the HBRP
Building upon the many years of heritage planning initiatives in Regina, a renewed vision for the HBRP seeks to encourage better heritage conservation outcomes throughout the community.

The City of Regina Heritage Building Rehabilitation Program will provide dependable and accessible incentives for a variety of heritage property types across the city. These incentives will foster a higher level of heritage conservation in the community, revitalize neighbourhood development, and raise awareness of the cultural importance of preserving our shared history.

4.2 HBRP Goals

GOAL #**1: INCREASE HERITAGE CONSERVATION EFFORTS**
Offer additional incentives that are predictable and consistent and that are most effective within the evolving market, for a variety of property types and owners. Update heritage policy to encourage meaningful conservation and the ongoing maintenance of heritage properties.

   Strategic Directions:
   - Remove policies and processes that may discourage heritage conservation.
   - Stimulate the community's interest in undertaking heritage conservation projects.
   - Streamline the processing of heritage property applications (both incentives and permits).
   - Encourage property owners to maintain their heritage properties.

GOAL #2: SUPPORT NEIGHBOURHOOD CHARACTER
Target incentives toward historic places that support local identity. Ensure more sustainable neighbourhood development, while retaining historic places and valuable character-defining elements.

   Strategic Directions:
   - Integrate heritage conservation considerations into neighbourhood planning programs.
   - Link HBRP to environmental, social, and economic sustainability initiatives.
   - Enhance the viability of conserving heritage properties over time, despite ownership changes.

GOAL #**3:** PROMOTE **GREATER** PUBLIC **APPRECIATION OF HERITAGE PROPERTIES**
Promote enthusiasm and support for the celebration and protection of the city's historic places. Demonstrate heritage leadership by linking program information to civic and partner campaigns designed to educate the public on the benefits of heritage conservation. Consider additional sites as heritage, including those with environmental or intangible cultural value.

   Strategic Directions:
   - Seek opportunities for heritage awareness and education campaigns and partner with organizations offering these programs.
   - Improve access to information on heritage sites.
   - Celebrate and highlight heritage designated sites.

5. PROGRAM REVIEW

Overview
The HBRP exists within the overall heritage planning framework in the City of Regina. As such, the program cannot be fully evaluated without understanding its relation to other heritage policies, procedures, and initiatives.

There are two primary categories of heritage properties in the City of Regina.
- Heritage Inventory *listed* properties have been identified as possessing heritage value and which have the potential to become designated.
- *Designated* heritage properties are legally protected against demolition or significant change under *The Heritage Property Act* of Saskatchewan. These properties are confirmed to have historical, cultural, or architectural significance. Approximately 100 properties have been designated in this manner.

Currently, the primary determinant of eligibility for HBRP incentives is the legal *designation* status of heritage property. In order to be considered for this status through an application process, a building must first be recognized as having heritage significance and this is an ongoing effort at the City. The City of Regina has been very effectively and methodically analyzing and documenting properties on its Heritage Inventory. This initiative will prove critical to increase the number of properties that may be eligible for heritage incentives, thereby increasing interest in a renewed HBRP. There is a potential to expand certain incentive eligibility to properties that are Heritage Inventory listed and not fully designated. Again, the City's efforts to evaluate listed properties will prove valuable in this case.

The City has also recently completed its *Historic Context Statement* and *Thematic Framework*, two very important, best practice documents that help thread its individual historic sites together as part of a larger system of heritage properties across Regina. These documents will also assist the City in the future identification of potential heritage properties as neighbourhoods grow and mature. Other heritage planning program components have been studied and through discussions with various parties, the desired position and scope of the HBRP has been communicated.

5.1 Engagement Activities
A robust internal and external engagement process has taken place to ensure civic and community groups have been consulted on the program and its desired upgrades. The following collaborative engagement activities occurred as part of the HBRP review. The groups were selected to ensure the most appropriate cross-section of citizens were consulted regarding their experiences with heritage properties across the city.

- Workshop with City Staff: March 15, 2021
- Workshop with City Council: April 19, 2021
- Workshop with Heritage Regina: May 17, 2021
- Workshop with Heritage Property (both listed and designated) Owners: May 28, 2021
- Workshop with Real Estate Developers and Realtors: June 1, 2021

The workshops consisted of the following components:

Part 1: Project Introduction and Heritage Conservation Best Practices
The first part of the workshops introduced the overall project parameters and goals and provided an overview of global best practices regarding heritage conservation.

Part 2: SWOT Analysis
A review of the program's Strengths, Weaknesses, Opportunities, and Threats took place in Part 2 of the workshops. Participants were asked to consider past and current local heritage conservation efforts as direct input was provided during each session. Responses to each facet were documented and helped to steer the direction of the HBRP analysis and recommendations.

Part 3: Heritage Incentives Review
The next part of the workshop involved an overview of the different types of incentives that municipalities can offer, as well as some examples of specific incentives that are either already available or could be made available. Based upon experience in comparable communities, suggestions were offered regarding what is generally applicable and valuable to further explore.

Part 4: Maintenance Standards Review
A review of minimum maintenance standards that can be applied to municipally designated heritage buildings then took place.

Part 5: Questions
The final part of each workshop was left open for any remaining questions from participants.

Much of the workshop feedback included personal experiences and challenges with a variety of heritage property types across the city. The focus of the challenges was primarily the higher costs required to maintain and properly conserve heritage buildings. There were numerous questions about what the HBRP currently offers and which properties are eligible, as well as suggestions for improvement, such as the transparency and accessibility of this information.

In addition to the workshops, a webpage was established on the City's primary engagement portal: *Be Heard Regina*. This consolidated information on the engagement process and included a public survey. Finally, feedback and commentary submitted directly to the City was accepted and considered.

5.2 Program SWOT Analysis
The feedback received throughout the engagement process formed the backbone of our program analysis and is organized into the following Strengths, Weaknesses, Opportunities, and Threats.

Strengths
- There is a long history of municipal heritage planning in Regina.
- Commercial heritage property owners are taking advantage of property tax exemption incentive.
- Grants are working well, despite the fact there is only an approximately $30,000 annual budget allocation and they are only available to non-profit heritage building owners (generally churches).
- There is general public awareness of the two incentive categories (property tax exemption and grants) currently available.
- The number of heritage designated properties is increasing.
- The heritage site assessment process is robust and yielding greatly improved information.
- There is considerably more local interest in the overall heritage field in the last few years.
- The City has fostered a good working relationship and communicates regularly with Heritage Regina.
- City Council has been very approving of heritage incentive applications.

Weaknesses
- There is a lack of awareness in the community (both property owners and realtors) regarding the actual meaning of designation versus Inventory-listing and there are perceived extreme restrictions of designation.
- The lists of heritage properties (designated and Inventory) are not easily accessible.
- Not everybody understands the value of conserving heritage properties.
- There is a general viewpoint that "heritage" only encompasses "old" houses and does not include the wide variety of other heritage property types (commercial, institutional, multi-family, etc.).
- There is a lack of diversity within the types of incentives offered.
- There are no standards of maintenance for heritage properties, which can lead to unnecessary building demolitions due to neglect.
- The cost of producing necessary heritage documentation for incentive eligibility (namely Statements of Significance and Conservation Plans) can be difficult for certain property owners to afford.
- City Council must approve heritage incentive applications, adding work that may better be suited to either Staff or a heritage committee or board (which does not currently exist).
- Considerable Staff time is spent guiding applicants through the heritage approval process.

Opportunities
- Heritage could be better understood within the community as directly linked to environmental sustainability and neighbourhood vibrancy efforts.
- Community associations could be better integrated into the heritage planning and heritage site identification process.
- Eligibility for incentives could be expanded to include more ownership groups.
- Incentive offerings could be expanded to target additional heritage property types.
- Certain incentives could specifically target maintenance and repair work, as well as heritage documentation.
- A heritage committee or board could be formed to help oversee an expanded incentive program.
- Education and awareness campaigns can help raise public appreciation for heritage properties and heritage conservation throughout the city (and not just within heritage-concentrated neighbourhoods).
- Additional neighbourhoods have the potential to become Heritage Conservation Districts, which help brand areas as historically important on a citywide scale.
- New avenues of communication could be explored to help excite the public about the important and ongoing heritage assessment work underway within the City.
- There could be better access to heritage site and HBRP information on the City's website.
- The heritage site plaque program could be restarted to recognize and draw attention to the importance of heritage conservation.
- There can be linkages to complementary initiatives, such as the Regina Cultural Trailway.
- High profile heritage projects can serve as examples of the public benefits of conservation (such as the Municipal Justice Building).

Threats
- The incentive program will be challenged to keep up with rising construction costs.
- The HBRP is competing with other budgetary considerations/demands and not everyone is supportive of spending public money on heritage conservation efforts.
- Designations may adversely impact certain property owners if they are not voluntary.
- The intensification levy creates a disincentive to increasing density on heritage lots, which may compromise the long-term viability of certain properties.

5.3 Internal Process Assessment
Working with City Staff, we have analyzed certain internal processes that may benefit from updates to further support the goal of conserving heritage properties throughout Regina. By addressing the following heritage planning protocols, the overall HBRP also stands to benefit from a more robust municipal response to enquiries and future permit applications.

5.3.1 Heritage Flagging System
The Heritage Inventory was established to manage municipally identified and recognized places of heritage value in the city; 290 properties were listed on the Inventory (previously known as the Heritage Holding Bylaw) in 1989 when it was adopted. This program predated *Statements of Significance*, which are now considered best practice for the recognition, planning, and management of historic places in Canada.

Currently, historic places listed on the City's Heritage Inventory are tied to a flagging system that is triggered when land-use changes and development and building permits are submitted by an owner. If it is determined that the historic place may be immediately at-risk, the City can institute a 60-day hold to allow for discussions between the City and the applicant to mitigate irreversible interventions to the historic place. However, this process only acts as a layer of protection for sites already included on the City's Heritage Inventory. Sites that may qualify for the Inventory, but have not yet been identified, may be at risk for demolition simply because they were not flagged. Though age is not the single most significant factor when considering the value of a place, it can be a useful metric for the City to flag potential heritage sites. Further to this, the City could institute a rule by which all buildings (whether Inventory-listed or not) over a certain number of years old (50 may be most appropriate) are automatically flagged in municipal property database systems for further research before any permit decisions are made. This would effectively be a new "demolition delay" tactic that will allow for the analysis of any building greater than 50 years old. The City can take one step further and mandate a formalized Heritage Assessment to be completed (by a qualified heritage professional) for any property over 100 years of age.

5.3.2 Neighbourhood Heritage Planning
As community planning updates occur throughout the city, there should be greater attention paid to potential heritage properties within these communities. A common tool utilized through these plans is a *Places of Interest List* (POIL), which is a listing of properties that have potential heritage value, but have not yet been recognized as part of the Heritage Inventory. These properties may be over a certain amount of years old, may possess unique/historic aesthetic features, or they may hold specific value to area residents; in any case a process to address these properties through ongoing planning updates should be instituted as an additional layer of heritage planning work that will help to identify valuable properties before they are lost to redevelopment.

Additionally, the City could establish an online tool whereby the public can nominate sites to the Heritage Inventory. The portal could be relatively simple, asking nominators for an address, a photo (if possible), a reason for nomination, and any historic information that may be available. This portal could be available all year round and monitored by City Staff, or it could become available at a standard time each year.

5.3.3 Permit Application Review
Reactivating a Heritage Commission, as an advisory body, may help to reduce the burden of Council fully reviewing each heritage property permit application. This may also address the overheated publicity of certain applications since they would be reviewed through a more internalized method.

6. HERITAGE INCENTIVE OPTIONS

Overview
The most effective way to encourage heritage resource owners or potential owners to conserve and invest in the rehabilitation of their properties is by offering incentives. Incentives refer to programs or measures administered by the City or other community-based agencies to encourage the protection and retention of historic resources. Unlike regulatory measures, these tools usually offer something to the owner or developer in return for undertaking rehabilitation work or legal protection. Often, they work hand-in-hand with regulatory policies, in order to offer tangible advantages to heritage property owners. Examples of incentives include grant programs, tax incentives, technical assistance, or agreements that waive or vary standard requirements.

All heritage-listed properties could ultimately become eligible for incentives. A program of effective incentives appropriate to Regina should be created that will strategically encourage authentic conservation and rehabilitation, by encouraging owners to invest in their properties.

After a community decides to expand an incentives program to better encourage the retention, rehabilitation and protection of its heritage resources, there are a number of steps that should be taken in the program upgrade.

A community recognizes the benefits of support to owners of heritage properties when:
- The evolving needs of heritage property owners are identified.
- Support mechanisms are explored and the most appropriate methods are selected.
- The support program is designed, including eligibility criteria, program management, Staff coordination and budgeting. The incentive program may include a variety of components that provide both financial and non-financial support.
- The terms and conditions of receiving incentives are determined (such as the expected level of heritage fabric conservation) based on the owner applying accepted conservation best practices.
- The expanded incentive program is implemented, monitored, and modified periodically to respect the changing needs of property owners and the community.

The City of Regina should provide a broad range of conservation incentives to heritage property owners, including financial and non-financial (developmental and administrative) incentives. These incentives can be provided as an incentives package (including more than one type of incentive) that can be offered in exchange for conservation of the resource and legal protection.

6.1 Financial Incentives
Heritage conservation incentives can be provided through financial support. Each project needs to be individually assessed to determine which incentives may apply, as different levels of assistance may be required to ensure financial viability.

There are a number of financial incentives that the City offers to encourage heritage conservation. The current HBRP encompasses two types of financial incentives: (1) direct grants from the City; and (2) property tax exemptions. Other financial incentives that could be considered include reduced permit fees.

6.1.1 Direct Grants
One of the most motivating incentives, especially for homeowners, can be direct financial assistance. Even modest grants are sometimes extremely effective in promoting conservation

among residential heritage property owners. These are often only seed money or a show of support, rather than reflecting a large share of restoration costs. Grants sometimes "top up" a project so that the specific heritage character-defining elements (for example, porches) can be restored. Sometimes relatively small projects can have a dramatic impact on the appearance of a heritage building exterior (such as the opening of an unsympathetically enclosed verandah, heritage paint colours, or the re-installation of wooden windows and doors). The City of Regina currently offers, through a limited budget, direct grants for designated heritage properties, owned by the non-profit sector. The City could consider allocating an increased budget amount for heritage conservation grants that could be offered to additional ownership groups. A general funding rule, based upon the most successful municipal granting programs, is the allocation of one dollar per resident, per year. Funding a grant program at this level helps ensure the program is predictable and able to offer assistance to a wider variety of projects, on an ongoing basis.

Grants could be used for a variety of heritage conservation activities, including:

Research and Documentation
Before conservation work is undertaken, best practice necessitates proper research and documentation to understand a historic resource. Independent contractors are often best suited to undertake this work, yet it can be dauntingly expensive for property owners (especially homeowners) to commission. Grants could be offered to help offset some of these documentation costs, which will ultimately result in projects meeting a higher conservation standard.

Maintenance and Repairs
In order to encourage property owners to consistently maintain their heritage buildings, revolving maintenance grants can be offered that will cost-share these activities every so often.

Physical conservation work
The cost to perform conservation work (namely rehabilitation and restoration) on historic buildings can be cost-prohibitive without financial assistance. Grants can cost-share heritage conservation projects with property owners.

Additional considerations for an expanded grant program include the following.

Grant Eligibility
In order to help a greater number of property owners, grant eligibility could be expanded beyond the non-profit sector, which is the only group currently offered assistance. Grants would be especially useful for research and documentation activities, as well as ongoing maintenance; legal designation could be an expectation when outlaying larger sums of grant funding for physical conservation work. In general, there should be a contractual expectation that properties receiving financial assistance cannot be demolished or significantly altered for a certain period of time. This could range from 10 years for smaller documentation/maintenance grant amounts for Inventory properties, up to a much lengthier amount of time, which would be negotiated with designated property owners.

Grant Applications
City Staff currently administers grant applications and City Council is the approving body. This could continue, however the application process will need to adapt to the expected increase in the number and complexity of applications coming from an

expanded program. The preferred alternative to the current arrangement would refer the applications to a new Sector Reference Group. Grant applications for significant conservation work could include a new requirement for a *proforma* analysis, which would need to indicate the financial viability of these projects. Further study will be needed to confirm the viability criteria that should be included. Applications could also be expected to meet criteria which will help ensure the project meets heritage conservation best practice (*Standards and Guidelines for the Conservation of Historic Places in Canada*). Proposed upgrade projects or changes in use should also meet criteria to ensure they fit well within the neighbourhood. Independent structural reports may also be an appropriate requirement in certain cases.

Future Grant Program Administration
There are a number of municipalities that offer programs through municipally-funded foundations that provide direct financial assistance to the owners of residential heritage properties. In the future, the City may wish to consider the feasibility of establishing a similar heritage foundation, which could be charged with the administration of the grant program. A heritage foundation would also be able to actively fundraise (beyond the annual funding allocation from Council) to fulfill its mandate and establish an identity distinct from the municipal government. Matching funding could be sought through corporate sponsorship, private foundations and other sources. Potential steps in the establishment of a dedicated Heritage Foundation could include:

- **Step One:** Confirm feasibility of a Regina Heritage Foundation that would provide financial incentives for the conservation of heritage buildings.
- **Step Two:** Formally establish the Foundation through a resolution of Council.
- **Step Three:** Through Council, appoint a Board of Directors and identify an annual budget.
- **Step Four:** Initiate a Fund Development Program that could include building an endowment, planned giving, patronage (Honourary and Active), "Friends of the Heritage Foundation," Corporate Sponsors, etc.

6.1.2 Property Tax Exemptions
Currently, if a property owner undertakes a rehabilitation of a heritage building, they usually encounter an increased property tax assessment due to an increase in market value. This, combined with the high cost of meeting building code requirements, can make the upgrade of heritage properties a marginal economic proposition.

Municipalities may choose to forgive all or part of the municipal portion of the property tax on a heritage property as long as the property is legally protected. In these cases, the tax relaxation may be calculated based on the extent and cost of the rehabilitation. The City of Regina currently offers a tax exemption over 10 years for 50% of eligible costs.

Experience in the United States has demonstrated that incentives tied to income tax are amongst the most effective mechanisms for the preservation of heritage buildings. In Canada, federal income tax incentives for conservation do not currently exist, but municipal tax-based heritage grants have been proven to be successful in many cities including Regina. This currently available incentive is generally most attractive to commercial heritage property owners as it helps offset operating costs. Residential heritage property owners do not typically find this existing incentive to be enticing enough to encourage capital-intensive conservation work, as it does not provide any funding up front when project costs are due.

6.1.3 Reduced Permit Fees
The City should review its current permit application procedures to ensure that there are no additional disincentives to proposed heritage conservation (including maintenance) projects. In addition, building permit fees could be waived for heritage property applications; this would not be a large incentive but would send a message of administrative support.

Additional funding assistance may be available from a wide variety of other government and private programs. Private foundations may also be willing to support local heritage conservation efforts.

6.2 Developmental Incentives
Heritage conservation incentives may also be provided through non-monetary support. In addition to the measures listed below, the City could examine heritage policies for their applicability to neighbourhood planning initiatives; integrating heritage conservation within community development goals will help ensure a more culturally and physically sustainable response to city building.

6.2.1 Relaxations/Variances
When approving heritage site permit applications, the City has discretionary powers and may relax some requirements, especially when other amenities are being offered. In return for the conservation/rehabilitation of a heritage building, the City may be able to relax requirements related to parking, setbacks and access. Similarly, some requirements could be relaxed in order to prevent conservation principles and guidelines from being compromised. One example would be a lot with an existing heritage home that is zoned for duplex use. In this case, an infill house could be built on the property instead, and perhaps a slight increase in allowable density could also be allowed. Each situation will be unique and will require special consideration. To date, there appears to be little community appetite for this type of incentive, however, it may become more valuable if attitudes change within certain mature neighbourhoods.

6.2.2 Density Bonusing and Transfers
A powerful heritage incentive that can be offered is the redistribution of density or an increase in allowable density. Sometimes there is an option to increase the allowable onsite density without compromising the context of the heritage building. In general, a 10% increase in allowable onsite density could be offered to designated properties in exchange for the long-term conservation of the heritage building. Larger properties may instead be eligible for subdivisions if additional dwelling units could comfortably and sensitively be added to the neighbourhood.

In other cases, a heritage building may be located on a property that has much higher development potential than currently occupied by the building, meaning that there is residual density that is not being utilized. In this situation, the residual density can be transferred or sold to another property, negating the need to achieve the allowable density onsite. In yet other cases, a conservation incentive – usually used to offset the costs of rehabilitation – may be offered through the creation of an additional bonus density that can be sold to a receiver site, with the resulting financial benefits being considered part of the incentives (compensation) package. Each of these situations require careful study of the potential impact on the heritage site, and an understanding of appropriate receiver sites for transferred density. This incentive has previously been studied and found not to be applicable to the existing context of the city. Again, it may prove to be more useful in the future.

6.3 Administrative Incentives
Incentives can also be provided indirectly to property owners, through the form of administrative protocols. Offering streamlined approval processing helps incentivize heritage projects and demonstrates civic leadership on the topic.

6.3.1 Permit Assistance
Streamlining the development and building permit application processes for heritage properties is a very desirable objective (also known as a "Green Door" policy). Heritage property owners will object to a complicated procedure if they are already concerned about costs. Heritage projects are sometimes more complex and can require additional review, therefore the permit review procedure could be simplified as much as possible. Pre-application meetings are a way for heritage property owners to ensure their application will be met with little resistance within the municipality.

6.3.2 Building Code Acceptable Alternative Solutions
Heritage buildings, as existing properties, often are unable to meet contemporary building code and energy efficient standards without seriously impacting their character-defining elements. Offering options for acceptable alternate solutions to building code compliance may help conserve their heritage character, while also meeting improved building standards. Education and training will need to be offered to the building inspection department since heritage buildings will usually have difficulty meeting all the provisions of existing codes, which have been written for new buildings. There is also an opportunity for the City to pay for a Code Consultant to work on behalf of designated property owners wishing to achieve acceptable alternate code compliance. This would help ensure that identified heritage features of designated properties are conserved, while also meeting present-day life safety objectives.

6.3.3 Heritage Support and Referral Programs
The municipality can provide additional support through:
- the provision of technical advice to heritage property owners regarding how best to conserve heritage buildings;
- referral to other agencies or organizations for further assistance; and
- publishing a list of recommended trades with expertise in heritage conservation.

7. RECOMMENDATIONS

7.1 Recommendations and Implementation Timeline

There will likely be a phased implementation of recommended procedures. Depending on timing, resources, and the levels of community interest and political will, these recommendations may be adapted and integrated into municipal processes as prioritized by Staff and City Council. These recommendations are based upon the results of the community consultation process and have been developed in collaboration with Staff to ensure Administration support.

A. Expanded Incentives: Grant Program

- Expand the HBRP incentive program's annual budget: consider establishing a new "Heritage Fund" based upon $1 per resident, per year, with a cumulative/roll over provision that lets funds accumulate if budget is not exhausted each year

Eligibility and Requirements

- Since there will initially be a limited pool of funding to access, grant eligibility could either be:
  - Limited to already designated properties
  - Offered to inventory properties as well, but only in exchange for designation, or only offered at a rate of ~50% of funding otherwise available to designated properties
  - In cases where application demands exceed the available budget, designated properties should take precedence over inventory properties; merit and demonstrated need should also be considered in these situations
  - Retroactive approvals for incentives should not be encouraged, to ensure all applications meet the requirements of the renewed program
- Permit direct grants to be used for physical upgrade work on all heritage property types and also for additional conservation activities, including research and documentation (Statements of Significance/Conservation Plans), as well as ongoing maintenance for all properties and accessibility upgrades for commercial properties; maintenance grants should be able to be accessed regularly (such as every other year, per property)
- Require a proforma financial analysis (indicating the "heritage premium costs" and projected revenue, if applicable) to be included with applications for direct grants related to major conservation work
- Further study of financial implications and the viability of upgrading and conserving heritage buildings would support considerations of the trade-offs between the value of conservation and the financial impact to the City/taxpayers and property owners; local case studies, including examples of commercial and single and multi-family residential projects that have benefitted from heritage conservation efforts could provide lessons learned
- Independent structural reports should also be required for grants above a certain threshold or when Council is considering designating a property without the owner's express consent

Program Considerations

- Administration, not Council, should be responsible for processing and approving grants, as the workload will greatly increase as part of an expanded program; ideally a Sector Reference Group should be established for this specific purpose
- Grants should be targeted towards those properties otherwise unable to access other financial incentives, however there should be an ability to combine financial incentives when merit is demonstrated and overall program budgets allow
- This new granting program should also be accessed when Council is considering designating a property without the owner's express consent; economic viability should be reviewed and a financial incentive package should be offered to the owner, based upon the premium costs of heritage conservation and retention, over and above those that would be expected to be offset in sale proceeds for a fully re-developable parcel

Timeframe	Lead	Support	Requirements	Intended Outcomes
Short term	Administration: Planning	Council, Administration: Finance and Legal	$250,000 annually; Staff time to intake applications/work with new Sector Reference Group	Wider variety of sites and activities eligible for financial assistance, leading to greater and more frequent conservation efforts

B. Information Accessibility and Transparency
- Expand information on the City's heritage planning webpage to include an easily accessible list of heritage properties (as well as the clearly defined difference between being listed and designated); an introduction to the Standards and Guidelines for the Conservation of Historic Places in Canada; as well as the promotion of the expanded granting program and application process/requirements

Timeframe	Lead	Support	Requirements	Intended Outcomes
Short term	Administration: Communications	Administration: Planning	Staff time to implement	Improved transparency and increased public awareness of civic heritage programs

C. Improved Heritage Building Maintenance
- Establish a standards of maintenance bylaw to be applied to all heritage designated properties
- Require owners to agree to ongoing maintenance provisions when accessing grants/incentives
- Establish process to perform inspections to ensure properties are effectively being maintained; consider linking inspection requirements to interests of public safety

Timeframe	Lead	Support	Requirements	Intended Outcomes
Short term	Administration: Planning	Administration: Building and Legal	Staff time to implement and monitor	Improved condition of designated heritage buildings

D. Public Awareness and Education
- Collaborate with Heritage Regina to offer educational workshops and programming that will increase community knowledge regarding the importance of and benefits gained from heritage conservation/the HBRP; consider highlighting (in a public manner) successful heritage conservation projects; contribute to Heritage Regina's Cultural Trailway initiative

Timeframe	Lead	Support	Requirements	Intended Outcomes
Medium term	Heritage Regina	Administration: Planning	Staff time to monitor	Increased public awareness of HBRP and overall civic importance of heritage conservation

E. Ongoing Neighbourhood Heritage Planning
- Further integrate heritage planning into the neighbourhood planning process by requiring Inventory surveys and studies (specifically "Places of Interest Lists") to occur in tandem with community plan updates
- Establish an online public nomination system, whereby members of the public can suggest additions to a Places of Interest List and/or information for local walking tours

Timeframe	Lead	Support	Requirements	Intended Outcomes
Medium term	Administration: Planning	Administration: Communications	Staff time to design, implement, and monitor	Increased number of sites important to the community considered for heritage status

F. Building Code Updates
- Work with City building inspectors (including education and training initiatives) to establish code equivalencies and exemptions for heritage buildings, as well as standards for energy conservation and other "green" building policies to link sustainability with heritage preservation; consider offering a new incentive to designated property owners in the form of paying for a Code Consultant to help owners achieve alternative code compliance in permit applications; look to the City of Saskatoon for guidance on alternative code compliance work within the provincial context
- Study how policies (including heritage and building/planning/development) can better integrate with overall civic sustainability/environmental goals, such as landfill diversion requirements that effectively discourage the disposal of historic materials in good condition

Timeframe	Lead	Support	Requirements	Intended Outcomes
Medium term	Administration: Building	Administration: Planning	Staff time to study and participate	Reduced conflicts between building codes and existing heritage building realities; increased green initiatives for existing buildings

G. Permit Application Processing
- Establish a formal process for pre-application meetings to align civic goals with owner plans, before accepting permit applications for changes proposed to heritage listed properties; offer a list of recommended local trades and professionals experienced in heritage conservation
- Make building permit fees for proposed work on heritage properties eligible for repayment as an incentive
- Consider a zoning bylaw amendment allowing for an increased number of units on designated residential lots in exchange for the long-term conservation of the heritage building; the number should correlate with the maximum allowed as if the lot was theoretically subdivided

Timeframe	Lead	Support	Requirements	Intended Outcomes
Medium term	Administration: Planning	Administration: Finance	Staff time to implement and administer	Streamlined permit application process for heritage properties, the removal of disincentives for conservation work, and further incentives for the conservation of designated properties

H. Further Expansion of Targeted Incentives
- Evaluate how certain non-standardized property types (such as strata-titled and mixed-use properties) could be specifically targeted within the HBRP, as these properties may have difficulty qualifying for incentives based upon guidelines that may unintentionally favour single-owner and single-use residential or commercial or institutional properties

Timeframe	Lead	Support	Requirements	Intended Outcomes
Medium term	Administration: Planning	Administration: Legal	Staff time to study	Additional site typologies supported by HBRP

I. Heritage Commission
- Consider reactivating a Heritage Commission, which could advise Council on heritage property permit applications

Timeframe	Lead	Support	Requirements	Intended Outcomes
Long term	Administration: Planning	Council	Staff time to liaise with Commission	Reduced burden on Staff to review heritage property permit applications

J. Heritage Foundation
- Study the feasibility of establishing an arms-length Heritage Foundation, which could be responsible for distributing grant funds

Timeframe	Lead	Support	Requirements	Intended Outcomes
Long term	Administration: Planning	Council; Administration: Finance	Annual budget; Staff time to liaise with Foundation	Reduced burden on Staff to review grant applications

K. HBRP Evaluation and Future Expansion
- Survey the community in the future to determine how well expanded HBRP is working
- Survey residential owners within historic neighbourhoods in the future to gauge a change in appetite for developmental incentives (infill/duplex, etc.)
- Survey commercial property owners in the future to determine when market conditions may warrant another look at a potential bonus density program for heritage sites

Timeframe	Lead	Support	Requirements	Intended Outcomes
Long term	Administration: Planning	Administration: Communications	Staff time to design, implement, and analyze surveys	Opportunity to recalibrate and potentially further expand the HBRP

7.2 Heritage Evaluation and Nomination Recommendations

In 2018, a comprehensive review of the City of Regina's Heritage Evaluation Program was undertaken, which recommended a substantive, wholescale shift from the original additive system to a values-based system. Since then, the new evaluation tool has been used to assess and provide Statements of Significance for historic places already listed on the City's Heritage Inventory. The current evaluation system has proven to be a vast improvement from the older, additive system. Sites are now considered through a broader lens of value. However, continuous use of the tool on a variety of heritage resources over the past three years has allowed for the determination of areas for improvement. The City can choose to maintain the status quo or can formally adopt the following measures, which would further strengthen the overall heritage program by ensuring it is on the leading edge of best evaluation practice. It is therefore recommended that the City:

- Institute a two-step evaluation approach:
  - Step 1: Conduct a Heritage Assessment on a potential Heritage Inventory site: if it does not qualify for addition to the Inventory stop here, if it does, proceed to Step 2
  - Step 2: Prepare a Statement of Significance and proceed with review and recommendation for addition to the Heritage Inventory to Council
- Remove the Grade 1/Grade 2 system, as it creates the unintended illusion that Grade 1 sites are inherently more valuable than Grade 2 sites
- Adopt a new Heritage Assessment Form (see Appendix B), which has removed the grading system and instead focuses on linking sites to historic themes as found in the Thematic Framework and Historical Context (which is considered best practice); sites linked to under-represented themes should potentially be considered a higher priority for conservation when questions arise regarding designation or demolition
- Adopt a new Statement of Significance Form (see Appendix B)
- Establish an online public nomination system, whereby members of the public can suggest additions to a Places of Interest List; the City should determine how information will be solicited, how nominations will be monitored, and how often nominations can occur

Timeframe	Lead	Support	Requirements	Intended Outcomes
Short term	Administration: Planning	Administration: Communications	Staff time to review documentation and nominations	Alignment of evaluation process with global best practice; prioritization (and potential conservation) of under-represented sites in City

Further details on the heritage evaluation and nomination process are found in Appendix B.

APPENDIX A: DEFINITIONS

Character-Defining Elements: the materials, forms, location, spatial configurations, uses and cultural associations or meanings that contribute to the heritage value of a historic place, which must be retained in order to preserve its heritage value.

Conservation: all actions or processes that are aimed at safeguarding the character-defining elements of a cultural resource so as to retain its heritage value and extend its physical life. This may involve "Preservation," "Rehabilitation," "Restoration," or a combination of these actions or processes. Reconstruction or reconstitution of a disappeared cultural resource is not considered conservation and is therefore not addressed in this document.

Guidelines: statements that provide practical guidance in applying the Standards for the Conservation of Historic Places. They are presented herein as recommended and non-recommended actions.

Heritage Value: the aesthetic, historic, scientific, cultural, social or spiritual importance or significance for past, present or future generations. The heritage value of a historic place is embodied in its character-defining materials, forms, location, spatial configurations, uses and cultural associations or meanings.

Historic Place: a structure, building, group of buildings, district, landscape, archaeological site or other place in Canada that has been formally recognized for its heritage value.

Intervention: any action, other than demolition or destruction, that results in a physical change to an element of a historic place.

Maintenance: routine, cyclical, non-destructive actions necessary to slow the deterioration of a historic place. It entails periodic inspection; routine, cyclical, non-destructive cleaning; minor repair and refinishing operations; replacement of damaged or deteriorated materials that are impractical to save.

Minimal Intervention: the approach that allows functional goals to be met with the least physical intervention.

Standards: Norms for the respectful conservation of historic places.

APPENDIX B: HERITAGE INVENTORY NOMINATION TOOL AND EVALUATION PROCESS STUDY

INTRODUCTION

In 2018, a comprehensive review of the City of Regina's Heritage Evaluation Program was undertaken, which recommended a substantive, wholescale shift from the original additive system (established in the 1980s) to a values-based system. Since 2018, the new evaluation tool has been used to assess and provide Statements of Significance for historic places already listed on the City's Heritage Inventory (formerly the Heritage Holding Bylaw). 2018-2021 acted as a trial period for the new evaluation system adopted in 2018; to date, 61 combined evaluations and Statements of Significance have been produced using the updated system. The current evaluation system has proven to be a vast improvement from the older, additive system. Sites are now considered through a broader lens of value. However, continuous use of the tool on a variety of heritage resources over the past three years has allowed for the determination of areas for improvement. In the following study, suggestions to improve the current process and its corresponding tools have been provided.

1. PROPOSED CHANGES TO THE NOMINATION AND EVALUATION SYSTEM

1.1 ADOPT A TWO-STEP PROCESS UTILIZING HERITAGE ASSESSMENTS
Heritage Assessments are an important part of the heritage planning process. It is the process through which a place and its associated features and history are critically analyzed against an organized framework. Heritage Assessments involve collecting and analyzing information about a place, its history, and its alterations and changes overtime. The purpose of the assessment is to make an informed judgment about a place, in order to make an informed decision about its future.

One common feature implemented by several well-functioning, values-based heritage evaluation systems from around was the preparation of an initial, well-researched Heritage Assessment, prior to establishing any official opinion about a potential historic resource. This process of conducting a Heritage Assessment prior to the preparation of a Statement of Significance (in a Canadian context) is critical. By definition, a Statement of Significance defines and codifies heritage significance, as outlined within the Heritage Value(s) and Character-Defining Elements sections of the document. Therefore, the preparation of a Statement of Significance should wait until the presence of heritage values and historical integrity has been determined. The decision on whether a site has sufficient significance (a combination of heritage value and integrity) to warrant the preparation of a Statement of Significance is an essential first step and should take the form of a Heritage Assessment.

> If, through the Heritage Assessment process it is determined that the site *does* have sufficient heritage value and integrity to be included the Heritage Inventory, a Statement of Significance should be subsequently prepared and its nomination to the Heritage Inventory should be submitted along with the Statement of Significance for approval by the municipal governing body.

> If, through the Heritage Assessment process it is determined that the subject site *does not* have sufficient heritage value and/or integrity to be included on the Heritage Inventory, it will not proceed to the next stage of the planning process, and a Statement of Significance will not be produced.

Assessments ensure that diverse values are considered and that results are as complete and unbiased as possible. A well-designed assessment is one that is replicable; another party should be able to conduct the same assessment and obtain the same (or similar) results. The higher the quality of the assessment design (in this case, the Heritage Assessment form), and its data collection methods and its data analysis, the more accurate its conclusions and the more confident the City and the public will be in its findings.

It is therefore recommended that the City of Regina:
- Adopt a two-step process whereby:
  - **Step 1:** Conduct a Heritage Assessment on a potential Heritage Inventory site, if it does not qualify for addition to the Heritage Inventory stop here, if it does, proceed to Step 2.
  - **Step 2:** Prepare a Statement of Significance and proceed with review and recommendation for addition to the Heritage Inventory.

1.2 NOMINATING SITES TO THE HERITAGE INVENTORY
The Heritage Inventory was established to manage municipally identified and recognized places of heritage value in the city; 290 properties were listed on the Inventory (previously known as the Heritage Holding Bylaw) in 1989 when it was adopted. This program predated Statements of Significance, which are now considered best practice for the *recognition, planning, and management* for historic places in Canada.

The City's Heritage Inventory has remained relatively static for the past three decades, and while the existing Inventory is presently in the process of being re-assessed and brought to modern standards, the City can continue to solicit potential new additions. Potential Heritage Inventory sites can be identified several ways, including through *neighbourhood planning processes*; *heritage survey processes*; and a *public nomination process*.

Currently, historic places listed on the City's Heritage Inventory are tied to a flagging system that is triggered when land-use changes and development and building permits are submitted by an owner. If it is determined that the historic place may be immediately at-risk, the City can institute a 60-day hold to allow for discussions between the City and the applicant to mitigate irreversible interventions to the historic place. However, this process only acts as a layer of protection for sites *already included* on the City's Heritage Inventory. Sites that may qualify for the Inventory, but have not yet been identified, may be at risk for demolition simply because they were not flagged. Though age is not the most significant factor when considering the value of a place, it can be a useful metric for the City to flag *potential* heritage sites. Additionally, the City could establish an online tool whereby the public can nominate sites to a Places of Interest List, which could feed into considerations for the Heritage Inventory. The portal could be relatively simple, asking nominators for an address, a photo (if possible), a reason for nomination, and any historic information that may be available. This portal could be available all year round and monitored by City Staff, or it could become available at a standard time each year. A more robust flagging system and a public nomination process would both aid in the identification of potential historic resources to be added to the Heritage Inventory. Most importantly, the processes adopted by the City should be clear, consistent, and reliable.

The City could consider the following:
- Institute a flagging system through the building database whereby sites over the age of X # of years[1] are automatically identified as requiring further analysis. When a permit or zoning change for a site over X # of years is submitted, a member of City Staff can conduct a Heritage Assessment (as outlined in the following pages) or hire a heritage professional to conduct the Assessment; and
- Institute a public nomination system for members of the public to nominate potential sites to a Places of Interest List.
- Institute policies for the survey and identification of potential historic places for possible inclusion to the Heritage Inventory as part of broader neighbourhood or area planning initiatives.

1.3 REMOVAL OF THE GRADING SYSTEM
Aside from instituting a two-step approach – Heritage Assessment before Statement of Significance – it is recommended that the City remove its current grading system entirely which presently classifies historic places as Grade 1 (City-wide significance) or Grade 2 (Neighbourhood-wide significance). Grading systems ultimately diminish historic places not in the highest tier and can create confusion among City officials, staff, and the public about their heritage values and expectation of conservation.

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[1] Requiring a place to be 40, 50, or 100 years old is an age metric used in multiple municipalities, though some use a specific year (e.g., 1970). This latter approach would require updating every few years to ensure it is capturing sites as they age. For example, if the threshold date is set at 1970, in five years it may be required to change this date to 1975, and so on. A sliding scale is therefore preferable. The age is best established through internal City discussions.

A Statement of Significance defines the value of a historic place and justifies its inclusion on a Heritage Value, and therefore, no additional ranking should be required.

Best practice for the evaluation of historic sites during the initial establishment of Regina's heritage program was a system developed for Parks Canada by Harold Kalman in 1979. Sometimes called the 'good-better-best' method, it ranked places based on a set of criteria that are scored numerically. Sites that score higher cumulatively (the 'churches, schools, and mansions') are considered more important than representative and typical examples (worker's housing') or less aesthetically pleasing and somber sites (jails, asylums, industrial sites). Biases can result in skewed rankings, and numerical codification are difficult to change in the future. Municipalities and jurisdictions across the world have abandoned numerical ranking systems in favour of values-based assessment systems; in turn, ranking historic places in any way has is now generally considered regressive. Despite this, some authorities maintain a grading system which rate some places as 'higher value', notably in England (Grade I, II*, and II).

Based on the past three years of trial, utilizing the combination Evaluation and Statement of Significance forms, it has been determined that the grading system is not necessary, and may in fact be detrimental to places scored as Grade 2, even though they have still been determined to be *significant historic places*. An even ground for heritage places allows each place to be eligible for the same incentives and protections, while the subsequent Statement of Significance defines the unique values for each place.

It is therefore recommended that the City of Regina:
- Remove the grading system and, to that end;
- Adopt the Heritage Assessment Form and subsequent Statement of Significance Form provided at the end of this document.

1.4 LINK THE SYSTEM TO THE THEMATIC FRAMEWORK AND HISTORICAL CONTEXT

The Thematic Framework and Historical Context for the City of Regina was prepared in 2017. Such documents are important tools in defining the historical patterns and trends that produced individual properties and serve as the foundation for decisions about the identification, evaluation, registration, and treatment of historic properties. The report provides the basis for evaluating historic significance and integrity. It answers questions such as:
- What aspects of geography, history and culture shaped a community's built environment?
- What property types were associated with those developments?
- Why those properties are important?
- What level of integrity is needed for them to qualify as historic resources?

The Thematic Framework and Historic Context are integral planning tools and use a set of interlocking themes based around activities rather than chronology, designed to facilitate a more inclusive approach to the identification of historic places. The intention for each section of the Thematic Framework was that sites would be interpreted from a range of different historical perspectives, including those of indigenous people, minorities and women, rather than just from the perspective of 'great men and events.' Frameworks were designed to allow more groups to be represented in the story of a place, and to decide how representative the range of managed historic sites is.

One of the aims of the report was to connect historic sites to broader historic stories, so it would be clear which stories were being told or neglected through the management and interpretation of historic sites. The Framework should cover all aspects of the surviving material heritage and help in prioritizing the heritage items to be conserved. A Thematic Framework should not be an exclusive tool but should be used in conjunction with evaluation of factors such as the aspects of history represented by a site; the physical integrity of the fabric in question; and the contemporary cultural value placed on the site

by members of communities. Therefore, Thematic Frameworks should be integrated into existing evaluation tools.

The Thematic Framework and Historical Context for Regina helps to further connect the City to a values-based approach to heritage planning and conservation. Divided into five broad Canadian themes, broken into 23 Regina themes, and narrowed further into 40 subthemes, the document provides a means to organize and define historical events, to identify representative historic places, and to place sites, persons and events in an overall, citywide context. It recognizes a broad range of values under which themes can be articulated and has assisted in the development of criteria for the evaluation of sites considered for addition to the Heritage Inventory. Further, it provides a basis for the review of sites already listed on the Inventory and strengthens the reasons for their inclusion.

It is therefore recommended that the City of Regina:
- Continue to link the Thematic Framework to the evaluation tools, and, to that end;
- Adopt the Heritage Assessment Form and subsequent Statement of Significance Form provided at the end of this document.

2. PROPOSED NOMINATION AND EVALUATION SYSTEM

As outlined above, the proposed Heritage Assessment tool for the City of Regina will be comprised of a comprehensive framework; the process of completing the document, which will require research and a site visit, will lead the evaluator to determine if the site is eligible for inclusion on the Heritage Inventory. Only those sites that receive a 'Yes' in Section 7 (Final Evaluation) of the Heritage Assessment form will go on to have a Statement of Significance prepared and be recommended for inclusion on the Inventory. Historic places will no longer be graded.

ELIGIBILITY
For a place to be considered eligible for the City of Regina's Heritage Inventory:
- It must be at least 20 years old;
- It must be a building, cultural landscape, and/or engineering work; and
- It must receive a 'Yes' in Section 7 (Final Evaluation) of the Heritage Assessment form.

  Note: These eligibility requirements exclude places such as archaeological sites, individual trees unless commemorative, movable objects, and intangible heritage.

PROPOSED NOMINATION METHODOLOGY AND CRITERIA
The methodology comprises three significance criteria, any one of which is sufficient to demonstrate heritage value and meet the Significance threshold. Multiple values can and will often be determined through this values-based approach. Additionally, a resource must *satisfactorily* pass an Integrity threshold. There are seven integrity criteria, and while it is preferable that a heritage resource meet all seven criteria, there may be instances when this is not possible. The final decision regarding the integrity threshold, if a resource has not met all seven integrity aspects, will require a judgment by the evaluator, as well as a written rationale. Both the Significance and Integrity criteria have been influenced by the City of Los Angeles's Office of Historic Resources and the United States' National Register respective evaluations. The primary benefit of the proposed evaluation system for Regina is its ease of use, and that it is values-based and self-sufficient as opposed to additive and cumulative; it allows for the greater recognition of intangible cultural heritage within a place and does not promote a significant bias toward architecture.

METHODOLOGY
A values-based approach is the most progressive and preferred approach to heritage conservation, which has been adopted and advocated by major conservation authorities, both at the international level (including the UNESCO World Heritage Centre and the Getty Conservation Institute) and at a national level (including Australia, U.K., U.S. and Canada). In Canada, *The Standards and Guidelines for the Conservation of Historic Places* advocates this values-based approach. Values-based approaches start by analyzing the values and significance attributed to places before considering how those values can be protected most effectively. An introduction of broader, values-based metrics represents a shift away from the traditional emphasis on architectural typologies and aesthetics, and a materials-based approach. Over the past few decades, other holistic approaches to heritage management have been evolving, particularly landscape-based approaches. A greater understanding of the significance of cultural landscapes has developed, leading to a better appreciation of environmental factors, as well as intangible values such as continuity and identity. This advancing view of heritage also recognizes emerging trends in urban development, such as the need to integrate more sustainable city-building methods.

3. SUMMARY OF RECOMMENDATIONS

1. Institute a two-step evaluation approach:
    Step 1: Conduct a Heritage Assessment on a potential Heritage Inventory site, if it does not qualify for addition to the Inventory stop here, if it does, proceed to Step 2.

    Step 2: Prepare a Statement of Significance and proceed with review and recommendation for addition to the Heritage Inventory to Council.

2. Adopt the new Heritage Assessment Form, which has removed the grading system and links the Thematic Framework and Historical Context.

3. Adopt the Statement of Significance Form.

4. Establish an online public nomination system, whereby members of the public can suggest additions to a Places of Interest List. City to determine information solicited, how nominations are monitored, and how often nominations occur.

5. Integrate the survey and identification of potential historic places for inclusion onto the Heritage Inventory into broader neighbourhood and area planning projects and initiatives.

On the following pages, a comprehensive Heritage Assessment form has been provided, followed by a Statement of Significance form. The Statement of Significance form should only be completed if the resource scored a 'Yes' in Section 7 (Final Evaluation) of the Heritage Assessment.

4. CITY OF REGINA HERITAGE ASSESSMENT FORM AND STATEMENT OF SIGNICANCE FORM

HERITAGE ASSESSMENT

DATE:

EVALUATOR:

RESOURCE NAME			
ALT. RESOURCE NAME			
ADDRESS			
NEIGHBOURHOOD			
TYPE OF RESOURCE	☐ Building	☐ Cultural Landscape	☐ Engineering Work
LEGAL DESCRIPTION			
YEAR BUILT			
ORIGINAL OWNER			
BUILDER			
ARCHITECT/DESIGNER			
STYLE/DESIGN			
ORIGINAL USE			
PRESENT USE			
CITY OWNED	☐ Yes ☐ No		

CONTEMPORARY PHOTO   Max. Width: 6" | Max. Height: 4"

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1. RESEARCH PROFILE

Provide a condensed history of the resource.

2. SIGNIFICANCE CRITERIA

1. ASSOCIATIVE   ☐ Yes   ☐ No   ☐ N/A

- The resource is closely and meaningfully associated with one or more theme, event, period of time, culture, institution, person, community, or tradition considered important in the city's history.

2. CONTEXTUAL   ☐ Yes   ☐ No   ☐ N/A

- The resource is important in the historic development of the neighbourhood or city.
- The resource, by virtue of its location, its symbolism, or some other element, serves to communicate the heritage of Regina to a broad audience.

3. TANGIBLE   ☐ Yes   ☐ No   ☐ N/A

- The resource is important in demonstrating aesthetic characteristics and/or represents an important creative achievement in design, architecture, planning, construction, materials, or technology.
- The resource possesses uncommon, rare or endangered aspects of the city's cultural history.

THRESHOLD FOR SIGNIFICANCE CRITERIA

Has the heritage resource met *at least one* of the above criteria?   ☐ **Yes**   ☐ **No**
Yes is required for inclusion onto the Heritage Inventory.

3. INTEGRITY CRITERIA

1. LOCATION ☐ Yes ☐ No ☐ N/A

Location is the place where the heritage resource was constructed or the site where an historic activity or event occurred.

2. DESIGN ☐ Yes ☐ No ☐ N/A

Design is the combination of elements that create the form, plan, space, structure and style of the resource.

3. ENVIRONMENT ☐ Yes ☐ No ☐ N/A

Environment is the physical setting of the heritage resource. Whereas location refers to a specific place, environment refers to the character of the place in which the resource played its historic role.

4. HISTORIC FABRIC ☐ Yes ☐ No ☐ N/A

Historic fabric is the physical elements that were combined or deposited during a particular period(s) or time frame and in a particular pattern or configuration to form the heritage resource. Historic fabric may be obscured by later interventions.

5. WORKMANSHIP ☐ Yes ☐ No ☐ N/A

Workmanship is the physical evidence of the crafts of a particular culture or people during any given period in history. It is important because it can provide information about technological practices and aesthetic principles.

6. FEELING ☐ Yes ☐ No ☐ N/A

Feeling is the resource's expression of the aesthetic or historic sense of a particular period of time.

7. ASSOCIATION ☐ Yes ☐ No ☐ N/A

Association is the direct link between an important historic event, person, or original use and the heritage resource.

THRESHOLD FOR INTEGRITY CRITERIA

Does the heritage resource satisfactorily meet the above criteria? *   ☐ **Yes** ☐ **No**
Yes is required for inclusion onto the Heritage Inventory.

If the Evaluator has selected any 'No's' in the Aspects of Integrity, and determined that the heritage resource has satisfactory met the Integrity Criteria by selecting 'Yes' for the Threshold for Integrity Criteria, please provide a written description in the box below justifying the decision. In addition, please identify any other integrity issue(s).

* If sufficient evidence and/or documentation exists, take into consideration the possible reversibility of unsympathetic past interventions to the heritage resource.

4. CHRONOLOGY OF PAST INTERVENTIONS

In chronological order, document known and observable alterations to the resource.

YEAR
-

5. VALUES SUMMARY

In a concise, point form, specify any possible heritage values which could contribute to the overall significance of the resource.

-

6. THEMATIC FRAMEWORK

Select *one* City of Regina Thematic Framework (2017) theme most appropriate for the *primary* heritage value noted above.
Upon production of a subsequent Statement of Significance, update the primary theme if required.

☐ **1.1** Natural & Cultural Landscapes	☐ **2.5** Commerce & Service Industries	☐ **4.5** Sports & Recreation
☐ **1.2** Enduring First Nations Presence	☐ **3.1** Administration & Politics	☐ **4.6** Exhibitions & Fairs
☐ **1.3** Multi-cultural Settlement	☐ **3.2** Law, Order, & Security	☐ **4.7** Social Movements
☐ **1.4** Capital City Development	☐ **3.3** Defending Regina	☐ **5.1** Architecture & Design
☐ **2.1** Early Economies	☐ **4.1** Spiritual Life	☐ **5.2** Visual & Performing Arts
☐ **2.2** Transportation & Infrastructure	☐ **4.2** Education	☐ **5.3** Community Collections
☐ **2.3** Communication Networks	☐ **4.3** Heath Care & Social Services	☐ **5.4** Media
☐ **2.4** Extraction, Production, & Distribution	☐ **4.4** Community Groups	

7. FINAL EVALUATION

Has the heritage resource met the thresholds for both Significance and Integrity criteria, meriting it for inclusion onto the Heritage Inventory?	☐ **Yes** ☐ **No**

8. ADDITIONAL IMAGES

Additional images can consist of additional contemporary photos, historic photos, plans, and/or maps.

IMAGE #	Max. Long Side Length: 6"

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9. RESEARCH SOURCES

Provide an annotated reference list directly relevant to this resource.

STATEMENT OF SIGNIFICANCE

DATE:

AUTHOR:

RESOURCE NAME	
ALT. RESOURCE NAME	
ADDRESS	
NEIGHBOURHOOD	
LEGAL DESCRIPTION	
YEAR BUILT	
ORIGINAL OWNER	
BUILDER	
ARCHITECT/DESIGNER	
STYLE/DESIGN	
ORIGINAL USE	
PRESENT USE	

CONTEMPORARY PHOTO	Max. Width: 6"	Max. Height: 4"

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DESCRIPTION OF HISTORIC PLACE

Max. 4000 Characters

HERITAGE VALUE OF HISTORIC PLACE

Max. 4000 Characters

CHARACTER-DEFINING ELEMENTS

Max. 4000 Characters

The elements that define the heritage character of Name of Historic Place include, but are not limited to its:

-

ADDITIONAL IMAGES

Additional images can consist of additional contemporary photos, historic photos, plans, and/or maps.

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