Attachment D

Summary of written submissions - Armstrong's Point Heritage Conservation District (HCD) nomination and draft HCD study

The Department received 13 letters of support from 11 different properties. These letters acknowledged residents' ongoing support throughout the years-long process of using Armstrong's Point as a case study. Other reasons for support included:

1. Desire to preserve and acknowledge living, cultural and architectural history and the positive impacts of historic homes and areas in Winnipeg.
2. Desire to prevent more demolitions of architecturally significant and historic buildings, stemming from dismay related to the buildings that have already been demolished (e.g. the 32,000 square foot Bannatyne residential castle in Armstrong's point).
3. City and community benefits stemming from other cities with designated heritage districts (e.g. Toronto, Montreal, Vancouver).
4. The "balanced approach" taken which, in one respondent's opinion, was not "too onerous on individual homeowners". In another's words: "The final plan is a very good compromise between preserving heritage and allowing for appropriate modernizing where this is necessary.
5. The extent of community consultation, and the opportunities residents received to provide input.
6. Community pride and a firm belief in the significance and uniqueness of Armstrong's Point neighbourhood history.
7. Desire to preserve and improve the neighbourhood as a whole.

The Department also received six (6) letters of opposition from six (6) different properties. Reasons for opposition are listed and addressed below.

1. **Concern about potential restrictions on the ability to renovate, modernize, or sell personal property**

   It is not the intention that HCDs be 'frozen in time' but rather that growth and change be managed and guided in a way that is in character with the neighbourhood, specifically those within the public street rights-of-way and on those portions of private and public properties visible from the street. As a result, all interior works and any alterations, additions, demolitions, and infill developments not visible from the street would not require a Heritage Permit—unless elements are otherwise identified in specific heritage building designations at the municipal, provincial, or federal level.

   HCD's create a certainty for development. Much like many new developments or areas with an adopted secondary plan, an HCD plan would include guidelines about what can be built and how it should look, although not as prescriptive. Jurisdictional research has shown that in general, HCDs do not create increases in property taxes or insurance rates, but can create small rises in property values due to the certainty created by the guidelines.

2. **Concern that district designation would require as much work and investment as heritage designation on individual buildings.**

   Residential buildings in Armstrong's Point that do not currently have heritage status would not be subject to the same requirements as buildings with official heritage status. Rather, they would be subject to policies and requirements outlined in the HCD plan.

3. **Concern that the process has changed; impression that it was initially brought to residents as a non-legally binding idea but is now regulated by law.**

   The regulating law referenced in this citizen's concern is HCD By-law 87/2018. This by-law regulates the process and legal requirements involved with official designation of any potential HCD in Winnipeg – it does not regulate specific districts. Under the By-law, each potential district would be responsible for creating its own HCD study and HCD plan to guide changes into the future.

   The proposed HCD study (and the future HCD plan) for Armstrong's Point would not force property owners to make any specific changes to their properties. Additional requirements proposed in the HCD study would involve homeowners applying for heritage permits if they were undertaking certain types of work visible from the street.

   Residents would not be able to 'opt in' or 'opt out' of designation status, and the HCD plan would be part of the By-law. However from a legal perspective, this plan would not differ substantially from any other secondary by-law that helps preserve the character of a neighbourhood and creates certainty for future development. As in any area of the city, homeowners would still be able to voluntarily make changes and upgrades to their properties; however a heritage permit may be required prior to commencing work. .

4. **Concern that information has not been provided about the types of changes that would be permitted, and the process associated with making changes to one's property.**

   The draft HCD study outlines the associated process (acquisition of a heritage permit) and includes a section on what types of changes would not require a heritage permit. This information would also be included in the draft HCD Plan.

5. **Concern that the benefits of HCDs were not communicated to residents.**

   The benefits of HCDs were presented throughout the public consultation process, but the Public Service recognizes that not everyone may have participated in these processes, they may not have received the public bulletins delivered properties during the process, or they may have moved into the neighbourhood after the process was completed. In light of this, the benefits of HCDs have been re-iterated in Attachment B.

6. **Concern about placing restrictions on all neighbourhood properties as opposed to only ones with distinct heritage value.**

   Armstrong's Point contains three (3) properties with official heritage status, and 71 properties on the 'commemorative' list, meaning that they are resources of significant historical or architectural interest. The remaining 50 (approx.) properties are not on the commemorative list. The heritage character of this neighbourhood consists of a range of building types and ages set

in a distinctive designed landscape setting. All buildings provide a context for the historical development and building stock within the neighbourhood.

The value of establishing an HCD is that a district can be viewed as a *whole*, and not a group of individual properties. All properties contribute to the neighbourhood's character through general massing, setbacks, landscaping, the existing tree canopy, etc. As stated earlier, being part of an HCD does not mean that properties cannot be changed but rather that growth and change are managed over time (similar to other areas that have secondary plans guiding growth and change).

7. **Concern that the Cornish Library has been closed for renovations, and that the renovation plans outline a modernist architectural approach to the library's expansion.**

   The closure of the Cornish Library is a separate project, which is unrelated to the designation process of Armstrong's Point as an HCD. As stated above, the intent of an HCD would not involve a halt to all renovations or new constructions; rather it would ensure that development and changes occur in a way that is historically sensitive, reflective of the district's varied architectural styles, and in character with the neighbourhood. Plans for the renovation at the Cornish Library are subject to heritage review, much like future demolitions and house constructions in the area will be.