

COUNCIL REPORT

Report Date:February 7, 2024Contact:Zlatan Jankovic
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604.873.7492RTS No.:15927VanRIMS No.:08-2000-20Meeting Date:October 8, 2024Submit comments to Council

TO:	Vancouver City Council
FROM:	General Manager of Planning, Urban Design and Sustainability
SUBJECT:	Vancouver Heritage Register Upgrade

Recommendations

- A. THAT Council approve the upgrade to the Vancouver Heritage Register, generally in accordance with Appendix A.
- B. THAT subject to the approval of recommendation A, Council approve the amendments to the Heritage Policies, generally in accordance with Appendix F.

Purpose and Executive Summary

As authorized by the Vancouver Charter, Council established the Vancouver Heritage Register (VHR) to identify heritage properties, defined as real property with formally recognized heritage value. The VHR is used primarily as a quick-reference tool for information on buildings' heritage status. This may be of importance to the public, property owners, industry professionals and staff involved in land development and construction projects as City has specific policies and programs that apply to heritage properties, including heritage incentives. The purpose of this report is to seek Council approval of the proposed upgrades to the VHR Policy in order to align with the Council-approved Vancouver Heritage Program (VHP 2020), respond to Vancouver's UNDRIP Strategy, and to simplify development approval process.

Council Authority/Previous Decisions

- In 1986, Council adopted Vancouver Heritage Inventory
- In 1994, Council adopted Inventory as Register
- In 2013, Council approved the Heritage Action Plan

- In 2020, Council approved the Vancouver Heritage Program, its vision, goals, and directions, reaffirming the VHR as its critical component
- In 2022, Council approved the Vancouver Plan, including references to Vancouver Heritage Register Upgrade (8.3.3)
- In 2022, City of Vancouver UNDRIP Strategy, including references to Vancouver Heritage Register (Call to Action 4.7a)

City Manager's Comments

The City Manager concurs with the foregoing recommendations.

Context and Background

Vancouver Heritage Program (VHP)

In March 2020, City Council approved the Vancouver Heritage Program setting the direction for the Vancouver Heritage Register Upgrade. Direction included expanding the meaning of heritage to firmly embrace cultural heritage, and more specifically its tangible and intangible values. This work is aligned with City priorities including Vancouver Plan, Culture | Shift, and the UNDRIP Strategy. Further, it integrates emerging best practices as well as community engagement, with a particular focus on ethnocultural communities and self-directed input from x^wməθk^wəỷəm (Musqueam), Skwxwú7mesh (Squamish) and səlilwətal (Tsleil-Waututh) Nations. The Vancouver Heritage Register Upgrade responds to the directions set by the VHP.

Vancouver Heritage Inventory/Register

The original Heritage Inventory was adopted in 1986 based on an architectural survey of the city. Buildings were evaluated for architectural and historical significance, the extent to which the original context remained, and the degree of alteration to the exterior.

The heritage evaluation methodology was a numerical system, adapted from the methodology published by Parks Canada in 1980, which reflected the best practices of the time. The City considered a building's heritage merit in four categories: Architectural History, Cultural History, Context, and Integrity. Numerical scores were then calculated and ultimately classified into: A (primary significance), B (significant), or C (contextual or character). The Vancouver Heritage Inventory also came to include non-building resources, such as parks, trees, monuments, public works, and archaeological sites. However, only buildings were scored and classified using the adopted methodology.

In 1994, the Vancouver Heritage Inventory was renamed and subsequently adopted as the Vancouver Heritage Register, as it is still known today. It contains 2,267 listings on the Register (buildings and structures) and 129 non-building resources.

Vancouver Heritage Register Review Process

The review work unfolded in five phases over two years: methodology, format and content, policy compliance, data management, and Truth and Reconciliation. See Discussion below, and Appendix E - Table C for description and summary of findings through the review phases.

The review, as noted, was strongly informed by direction to include a key component for selfdirected input from x^wməθk^wəỷəm (Musqueam), Skwxwú7mesh (Squamish), and Səlilwətal (Tsleil-Waututh) Nations. In addition, the City also adopted the UNDRIP Strategy in 2022. UNDRIP Call to Action 4.7.a specifically informed the consultation with the Nations. It became evident that a significant amount of work on intangible cultural heritage would be required that is beyond the scope of the Heritage Register Upgrade project. Therefore, that work has been shifted to more appropriate work plans which will be brought to Council in the future. Consultation with the Nations is summarized below under the VHR - Consultation and Engagement Summary.

Discussion

The VHR review process included input from consultants, internal and external stakeholders, City advisory bodies, heritage organizations, x^wməθk^wəỷəm (Musqueam), Skwxwú7mesh (Squamish), and Səlilwətał (Tsleil-Waututh) Nations, and public in general. Staff also surveyed other Canadian cities for best practices. As a result, shortcomings were identified for both the VHR Policy, and its heritage evaluation methodology as follows:

- 1. VHR Policy and Content Review
 - a) VHR Policy Compliance

The VHR Upgrade process was guided by the Vancouver Heritage Program (VHP) principles as adopted in 2020. The policy review established that the Vancouver Heritage Register was inconsistent with contemporary best practices and City priorities. This included Council direction for values-based approach in heritage planning and resource management consistent with the Standards & Guidelines for the Conservation of Historic Places in Canada as well as by many Canadian municipalities. In addition, there are several listings on the VHR that do not necessarily comply with the Vancouver Charter definition of "real property" (e.g., trees, streetscapes, archeological sites), or were included without heritage evaluation (Parks), or both.

b) VHR Format and Content

The original Vancouver Heritage Register included five categories of inventory without appropriate heritage evaluation. The five categories subjected to this review were: Streetscapes (16 listings), Parks (23 listings), Trees (34 listings), Monuments (38 listings), and Archaeological Sites (17 listings), totaling 128 items. See Appendix C for more details. These listings were included in the VHR primarily to achieve some protection. However, the notion of implied protection should not be associated with the listing on the Heritage Inventory.

In addition, there are 92 other sites currently listed on the VHR that do not have heritage classification. Most of these sites are located within Chinatown and Gastown historic areas formally protected by the Provincial "blanket" measures of 1971. These are currently listed on the VHR but not counted as heritage sites as they were not evaluated. Therefore, it is recommended that these sites also be placed in the VHR Appendix for reference.

This report recommends the removal of the 128 non-evaluated listings plus 92 nonclassified sites totalling 220 listings from the Register and their placement in the newly created VHR Appendix for reference. The proposed removal neither changes any of the legal or regulatory protections of the listings nor erases the heritage value of them; rather it helps clarify for the approvals process what the appropriate regulations and jurisdictions are. The current heritage evaluation is an outdated methodology that does not fully embrace a diverse and equitable approaches. This methodology amplified architectural values, utilized an outdated evaluation system, and prioritized Eurocentric cultural influences. As noted above, the system utilized numerical scores in a heritage evaluation matrix (of groups A, B, and C). The recommendations of this report address improving the evaluation process through creation of a simpler yet more inclusive process while removing focus from preconceived embedded values and rankings.

The proposed new evaluation methodology reflects current best practices including a values-based, equitable, and community-centered approaches to heritage identification, recognition, and resource management. Major changes include:

- Removing Statement of Significance requirement except for sites subject to permit application review.
- Simplifying evaluation criteria to only three, with the requirement to qualify for addition to the VHR under one of the following:
 - o Cultural traditions, ways of life, and memories,
 - o Historical association with person, community, and/or organization, and
 - Design, materials, and technology.
- Shifting from an alpha-numerical grading system to a checklist format.

The new methodology allows the applicant to provide a historic context statement based on research findings by a civic and/or architectural historian and based on lived experience, oral stories, and narratives of communities, groups, and/or individuals associated with the place. The new methodology replaces a materials-based approach with three categories of evaluation criteria that identify both tangible and intangible values of place. Appendix B details the VHR Evaluation Methodology.

3) VHR - Consultation and Engagement Summary

The Consultation and Engagement Plan for the Vancouver Heritage Register Upgrade project was developed to both prioritize meaningful consultation with x^wməθk^wəỷəm (Musqueam), Skwxwú7mesh (Squamish), and Səlilwətał (Tsleil-Waututh) Nations, as well as to reflect community voices and perspectives. Note the consultation and engagement with the VHR Upgrade project remains separate to the City's improvement on the archeological management policies, processes, and procedures. This included:

- Over 35 virtual and in-person meetings with x^wməθk^wəỷəm (Musqueam), Skwxwú7mesh (Squamish), and Səlilwətał (Tsleil-Waututh) Nations. Some key takeaways were:
 - o protecting, managing, and sharing cultural heritage is a priority for all,
 - the VHR is incompatible with x^wməθk^wəỳəm (Musqueam), Skwxwú7mesh (Squamish), and Səlilwətał (Tsleil-Waututh) Nations understanding and experience of cultural heritage, and
 - x^wməθk^wəỷəm (Musqueam), Skwxwú7mesh (Squamish), and Səlilwətał (Tsleil-Waututh) Nations are interested in continuing to engage on cultural heritage or policies related to cultural heritage outside of the VHR process.
- Meetings or presentations with 12 civic advisory bodies. Some key takeaways were:
 - o the overall feedback on proposed changes was positive,
 - o all groups acknowledged the importance of the VHR Upgrade work and goals, and

- the three heritage-related groups Vancouver Heritage Commission, Gastown Historic Area Planning Committee, and Chinatown Historic Area Planning Committee, all provided formal motions of support for the VHR Upgrade work.
- Staff also attended multiple meetings with two external stakeholder groups Vancouver Heritage Foundation and Heritage Vancouver Society to provide information, gather feedback, and answer questions.

In general, there was overall support for the VHR Upgrade project. Feedback received through the engagement activities helped shape the outcome of the VHR Upgrade. The full consultation and engagement summary is included in Appendix D.

4) VHR Data Management Upgrade

The VHR Data Management Upgrade aims to modernize the efficient collection, storage, and management of VHR assets. As part of this work, staff have established a new data management process that:

- Streamlines data entry, reduces errors, and aids in analysis through compatibility with City GIS systems.
- Reduces data entry points and leverages automated tools.
- Integrates multiple City systems for heritage asset data and management including POSSE, portal for VanMap, Vancouver Open Data, and the online Vancouver Heritage Register.

This upgrade will also provide an opportunity for staff to simplify the entering data, analysis, and reporting of heritage assets in the future. The preliminary stages of implementing the data management plan include updating the various City systems that intake heritage asset data including enhancement of the public-facing interface for the Register. Implementation work will continue through Q4 of 2024.

5) Truth and Reconciliation - UNDRIP Strategy

Engagement with Nations for the VHR Upgrade Project began in January 2022 on a limited basis due to staff capacity with x^wməθk^wəỷəm (Musqueam), Skwxwú7mesh (Squamish), and Səlilwətał (Tsleil-Waututh) Nations. However, in combination with Review Process items 1-3, these preliminary meetings provided significant clarity and direction for updates and deliverables for the Vancouver Heritage Register.

Additionally, the City's UNDRIP Strategy, endorsed by the Councils of all three Nations, calls upon the City of Vancouver to implement the Calls to Action in the report. As such the City's UNDRIP Strategy provides strategic direction on how to reconcile the colonial legacy of the Vancouver Heritage Register and land planning with appropriately reflecting Indigenous cultural heritage. Call to Action 4.7a references the Vancouver Heritage Register document specifically:

4.7 Identify ways to support Musqueam, Squamish, and Tsleil-Waututh to practice their traditions on the land, including but not limited to:

a) Include the history of Indigenous culture and the truth of displacement and dispossession, on the landscape and in City documents, such as the Heritage Register.

Research findings and feedback received from the Nations, include:

- The Vancouver Heritage Register is a colonial planning tool, that continues to perpetuate the erasure of the Indigenous cultural heritage of Musqueam, Squamish, and Tsleil-Waututh peoples on unceded territory,
- x^wməθk^wəýəm (Musqueam), Skwxwú7mesh (Squamish), and Səlilwətał (Tsleil-Waututh) Nations' perspectives, views, and knowledge are not currently reflected in the Vancouver Heritage Register's definition of cultural heritage, and the City of Vancouver artificially separates tangible and intangible heritage, which is incompatible with Indigenous Cultural Heritage,
- As a planning tool, the Vancouver Heritage Register is limited to "real property", as defined in the Vancouver Charter.

The recommended amendments to the VHR Policy include a Truth-Telling Statement being prominently added to the Vancouver Heritage Register. The statement and land acknowledgment were developed in collaboration with x^wməθk^wəỳəm (Musqueam), Skwxwú7mesh (Squamish), and Səlilwətal (Tsleil-Waututh) Nations and are featured in the VHR Policy document that can be found in Appendix A. Emerging objectives for the VHR, related to Truth and Reconciliation, are identified in Appendix E – Table A.

6) Canadian Municipal Heritage Registers and Inventories - Best Practices Survey

In Canada, municipalities compile and maintain heritage registers and inventory lists as a means of identifying and managing heritage resources. They are used primarily in land use planning as one component of larger programs with associated tools and processes. Because they were founded on Eurocentric values prioritizing architectural heritage over local cultural and social values, they often cause the exclusion of certain communities while perpetuating Indigenous erasure from their traditional and ancestral lands.

The survey identified some local governments, including Calgary and Toronto, that have amended their heritage register or inventory by introducing a values-based approach to conservation in alignment with federal guidelines (<u>Standards & Guidelines for the</u> <u>Conservation of Historic Places in Canada</u>). This has prompted changes to the evaluation format, criteria, and grading system. In addition, some municipalities have introduced, or are in the process of introducing, processes for community input in identifying heritage places, including the proactive identification of heritage resources in the face of rapid development. See Appendix E, Table D - Canadian Municipal Heritage Programs Survey.

VHR Upgrade Key Deliverables

- 1) Updated VHR Policy (Appendix A VHR Policy Section 3.1), to clarify expectations for property owners, industry professionals, public, and staff on VHR listed properties.
- 2) Updated heritage evaluation methodology, process, and criteria for built-heritage resources, that are reflective of a values-based, equitable, community-centered approach to heritage conservation and resource management in alignment with the Council-adopted Vancouver Heritage Program (2020). (See Appendix B)
- 3) Reformatted Policy to meet accessibility standards. (See Appendix A)
- 4) New VHR Data Management Plan (implementation in Q4 2024).

- 5) Inclusion of Truth-Telling Statement in Vancouver Heritage Register Policy, in response to COV UNDRIP Strategy Call to Action 4.7a as shown in Appendix A.
- 6) Consequential amendments to Heritage Policies, Section 6.2, and Zoning & Development By-law, Section 10, Sentence 10.14.5. (See Appendix F and Appendix G)

Policy and By-law Amendments

The VHR categorization (A, B, C) is proposed to be removed from the upgraded VHR Heritage Evaluation Methodology and subsequently, from the reformatted VHR Policy, rendering the reference to category "A" buildings redundant. As a result, the following consequential Policy and By-law amendments are proposed:

- 1) To remove Section 6.2 from the Heritage Polices 2020 (see Appendix F)
- 2) To amend the Zoning and Development By-law Section 10 (see Appendix G)

The second amendment will be brought to Council for consideration at a future Public Hearing.

Intangible Cultural Heritage

Reframing the City of Vancouver's policies and approach to cultural heritage is a crucial part of our reconciliation and equity commitments. To offer the appropriate type of support, the City would need to change existing or create new tools, for cultural heritage. Some of these tools may be subject to barriers in Provincial legislation. Staff are in the early stages of this exploration and acknowledge more work is required.

Examples of work being in progress include:

- The Special Enterprise Program: Supporting legacy and cultural businesses in Chinatown.
- The Chinatown Cultural Heritage Assets Management Plan: a first-of-its-kind plan codeveloped with the community to support and steward cultural heritage assets.
- Commemoration Framework: Will establish an overarching set of priorities, principles, and processes to guide commemoration in City and Park Board.

See Appendix H for additional information.

Financial Implications

VHR Policy implementation activities will continue to be brought forward as part of the City's long-term financial planning and budget processes.

Legal Implications

If the Recommendations in this report are adopted, Council will revise the Vancouver Heritage Register and amend its heritage policies. This is authorized by Part XXVIII of the Vancouver Charter, including section 582.

APPENDIX A Vancouver Heritage Register Policy

Due to its size, the VHR Policy document is presented as a separate attachment to this Report.

APPENDIX B

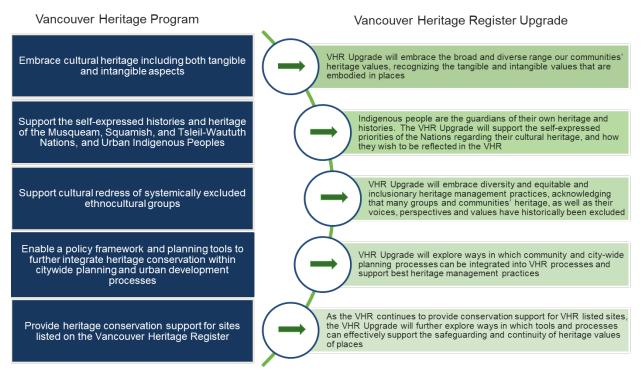
VHR Heritage Evaluation – Web Content

[Outline: The following content will be created for web purposes, consistent with the goals of expanded access, inclusion, and transparency. It will highlight changes to the VHR Policy, providing instructions on reading and understanding it, and explaining the evaluation process, which includes people-centered, equitable, community-based approaches.]

- General information VHR purpose and content, link to VHR policy (PDF)
- What's New re: VHR Upgrade
 - Overview of changes (Council 2024)
 - How does this affect me/my community?
- Common questions answered
 - What does it mean to have a building listed on the VHR?
 - What is the "M" municipal designation?
- How to read the VHR
 - Listings format
 - Notations explained
 - Buildings and structures table
 - Appendix
- Learn about the Heritage Evaluation Process
 - Eligibility criteria: scenarios
 - Streams: voluntary vs development
 - Process steps
 - Application materials
 - Internal evaluation form (PDF)
- How to apply to the VHR
 - Voluntary (with property owner's consent)
 - Development Process
- History of the VHR
 - Conservation program in brief

APPENDIX C

VHR Content Review, Proposed Changes and Rationale



Heritage Streetscapes: Although well-intended, the addition of 16 historic streetscapes to the Heritage Inventory / Register has not resulted in the improved retention of historic character or permit application process associated with buildings on heritage streetscapes. As the planning policy frameworks at the time did not provide specific tools for the support of cultural landscapes of this nature, there is a lack of clarity for property owners, developers and staff involved in permit application process for buildings within heritage streetscapes.

In the meantime, new ways to better support cultural landscapes, including heritage streetscapes, have started to emerge through community planning processes. As envisioned by the Vancouver Heritage Program, and implemented through the community planning process, this process ensures an adequate framework for community engagement, feedback, and policy development for community-based identification and recognition of cultural landscapes (including streetscapes and villages). This approach has been successfully applied through the recent Broadway Plan process, as well as the Rupert & Renfrew Area Plan and Granville Street Entertainment District Plan currently underway. So, the proposal in this report is to continue to identify and recognize the City's cultural landscape resources through a community planning process, where the resulting community plans would offer a home for the identified cultural landscapes, and may also enable additional resource management tools, like conservation density bonuses.

The existing 16 heritage streetscapes currently listed on the VHR are proposed to be moved to the VHR Appendix for reference purposes.

Parks: There are 23 parks currently listed on the VHR without being assessed for heritage value. In Vancouver, the management of park resources resides within the Vancouver Board of

Parks and Recreation jurisdiction, with its mandate "to provide, preserve, and advocate for parks and recreation services to benefit all people, communities, and the environment". This framework offers stronger recognition and protection of the city's park resources than what the listing on the VHR does. In addition, being listed on the VHR does not factor into decision-making, and parks are not managed differently based on their status on the VHR. Since 1986, no new parks have been added, removed, or significantly altered from the VHR, which would have necessitated a heritage review through the City's permit application process. Equally, trees and lawns within park areas have not been subject to a heritage review process as a result of their VHR-listed status. However, heritage buildings located within park areas are independently listed on the VHR and continue to be processed through the City's standard permit application process involving heritage review.

The proposal is to remove 23 listed parks from the VHR and place them in the VHR Appendix for reference purposes.

Trees: There are 34 trees listed on the VHR, 10 of them on privately owned properties and 25 within park areas managed by the Park Board. Although the Vancouver Charter defines the Heritage Register as a place for Real Property, these 35 trees have been featured on the VHR. It is important to note that no maintenance or modification of a privately owned VHR listed tree (10 entries), even its removal, was subject to a heritage review due to its listed VHR status, whereas it would always be subject to compliance with the Tree By-law provisions. This establishes the Tree Bylaw as a more appropriate regulatory and protection tool for heritage trees located on privately owned land. Ten (10) trees will be featured under the "Significant Trees" Schedule of the amended *Tree-Bylaw* currently underway. This would ensure, not just a recognition of their heritage (cultural) value but also appropriate ongoing maintenance and protection. The other 25 heritage trees would remain to be managed under the applicable Park Board regulations.

To rectify the Vancouver Charter non-compliance, and to provide more clarity for the management and protection of heritage trees, it is proposed that the 35 tree listings be removed from the Register and placed in the Appendix for reference purposes.

Monuments: Out of 39, 38 listed monuments were not evaluated for heritage value at the time of addition to the VHR. Most monuments are in Stanley Park and managed by the Park Board, or on public land around the city. In addition, the VHR and its associated heritage evaluation methodology were not intended for the assessment of intangible cultural heritage, which is the heritage category monuments are representative of. Since initial addition to the VHR, no new monuments were added or removed from the Register. The ACCS staff is currently working with Vancouver's communities on developing the Commemoration Program Methodology Framework which would devise an equitable, community-centered engagement process and offer a more comprehensive, inclusive, and equitable framework for intangible cultural heritage identification and recognition.

For this reason, it is proposed that the Monuments listed on the VHR are moved to the Appendix for reference purposes. It is also acknowledged that Planning staff is continuing to develop methodology framework for Intangible Cultural Heritage, separate from the VHR Policy and Methodology.

Archaeological Sites: Archeological sites on both public and private land, whether they are known or not, are protected under the Heritage Conservation Act (HCA) which is managed by

the BC Archeology Branch (Ministry of Forests). In 2021, the BC Ministry of Forests received a mandate for the Heritage Conservation Act Transformation Project (HCATP) to engage broadly with First Nations and stakeholders on the Heritage Conservation Act to identify priority areas for change. While this work facilitated by the provincial program is in process, City staff have engaged in direct consultation with Musqueam, Squamish and Tsleil-Waututh Nations staff on subjects of VHR Upgrade and UNDRIP Strategy. Although the Nations expressed interest in further conversation on Indigenous Cultural Heritage, they did not express interest in engaging with the VHR upgrade work, acknowledging its colonial and Eurocentric nature and the limited scope of the heritage it represents (namely, its short historic span and focus on built- heritage). There was no direction provided in relation to the status of archaeological sites currently shown on the VHR. The City continues to work on aligning City archeological policies, procedures, and standards to that of xwməθkwəỷəm (Musqueam), Skwxwú7mesh (Squamish), and Səlilwəta4 (Tsleil-Waututh) Nations management practices outside of the VHR Upgrade.

Respecting the self-expressed priorities of MST Nations regarding their cultural heritage and no direction to continue or expand featuring Archaeological Sites on the VHR, it is proposed to place these 17 listings in the Appendix for reference purposes.

Category	Resource Type	Proposed Changes	Rationale
Heritage Buildings		Category changed to "Built Heritage" Built Heritage category applies to buildings and structures	 Re-focusing the VHR to the resources (Built Heritage: Buildings & Structures) that COV manages changes for, through permit application process Would bring much needed clarity to homeowners and developers
Heritage Streetscapes		Removed from VHR, added to Appendix for "Reference Only"	 No management tools/policies for streetscapes (as opposed to buildings); Streetscapes identified for historic character recognition Identification of streetscapes more suited for recognition in community plan documentation (example Broadway Plan) If we were to keep Streetscapes, we would need to come up with a management plan for "Cultural Landscapes"
Landscape Resources	Parks & Landscapes	Removed from VHR, added to Appendix for "Reference Only"	 Parks managed by Park Board Park Board has a mandate to protect park assets; being on the VHR does not factor into decision-making and parks are not managed different based on their status on the VHR
	Trees	Removed from VHR, added to Appendix for "Reference Only"	 10 tree listings "covered" by tree bylaw (and could become significant trees); 25 tree listings managed by Park Board Park Board does not manage trees any differently based on their status on the VHR Trees are also living; no heritage management plan/policies currently for how to make decisions regarding the heritage value of trees
	Monuments	Removed from VHR, added to Appendix for "Reference Only"	 Monuments primarily on public land No heritage management plan/policies for monuments (Commemoration Framework currently underway); Likely that the current list of monuments may be somewhat problematic, in some cases Currently found under Public Art Majority of monuments in Stanley Park and managed by Park Board

Public Works	(3) Public Works listing added to Built Heritage; no separate category	Considered structures
Archaeological Sites	Removed from VHR, added to Appendix for "Reference Only"	 Not regulated by COV All archaeological sites are protected by HCA All sites in Vancouver captured by RAAD; access limited to those who require it (for example, City Archaeologist) Continuous improvement on the City archeological policies, procedures, and standards, and support the inherent rights of x^wmə0k^wəyəm (Musqueam), Skwxwú7mesh (Squamish), and Səlilwətat (Tsleil-Waututh) Nations to control their own cultural heritage.

APPENDIX D VHR Upgrade – Consultation and Engagement Summary

Phases of Engagement

Engagement for the VHR Upgrade project was conducted during two phases of the work. In Phase 1, staff conducted preliminary engagement between May and September 2022 that aimed to introduce the project, goals and guiding principles, project scope and methodology. In order to capture more diverse voices and perspectives, staff approached 12 civic advisory committees, which are intended to reflect the City's diverse communities, to introduce the project and ask how the group would like to be involved.

Engagement for Phase 4 was conducted between October and November 2023. The purpose was to report back to the groups consulted in Phase 1 and present the summary of changes and outcomes from the VHR Upgrade project, including content, processes and evaluation tools. Many groups approached in Phase 1 expressed interest in having staff return with a follow up meeting to learn more about the project outcome. As with the earlier engagement, there were opportunities to ask questions and provide feedback to staff.

a) Musqueam, Squamish and Tseil-Waututh First Nations

The Vancouver Heritage Register (VHR) Upgrade commenced in early 2022 with quarterly updates, engagement requests, and opportunities submitted to Musqueam, Squamish, and Tsleil-Waututh Nations through the Intergovernmental Relations (IGR) process beginning. Project notification commenced in February 2022 during Phase 1 and engagement request was made in May 2022. Quarterly updates continued through Q4 2023.

VHR Upgrade project staff received feedback from Squamish Nation in June 2022, at the SN-PDS Summit in February 2023. In January 2024 səlilwətał (Tsleil-Waututh) Nation provided written feedback on the draft Truth-Telling Statement. Their suggestions that the statement focus specifically on the lands of the x^wməθk^wəyəm (Musqueam), Skwxwú7mesh (Squamish), and səlilwətał (Tsleil-Waututh) Nations, and that it emphasizes the shared goal of developing new tools to identify and protect cultural heritage to uphold Indigenous knowledge and experiences, were integrated into the final draft.

The work was also informed by leadership conversations through the UNDRIP Task Force and Cultural Heritage Project (2022-2026), with the objectives of supporting self-determination for Musqueam, Squamish, and Tsleil-Waututh Nations to share and express cultural heritage; developing processes and tools to shift City of Vancouver decision-making to be guided by and incorporate Musqueam, Squamish, and Tsleil-Waututh cultural heritage and continuity.

b) Civic Advisory Bodies & External Stakeholders

Staff met with and/or sought feedback from the following groups:

- Vancouver Heritage Commission
- Chinatown Historic Area Planning Committee
- Women's Advisory Committee
- Arts and Culture Advisory Committee
- Gastown Historic Area Planning Committee
- Persons with Disabilities Advisory Committee
- Children, Youth and Families Advisory Committee

- Vancouver City Planning Commission
- Urban Indigenous People's Advisory Committee
- 2SLGBTQ+ Advisory Committee
- Racial and Ethno-Cultural Equity Advisory Committee

DATE	NAME
May 24, 2022	Squamish Nation and City of Vancouver meeting
May 30, 2022	Squamish Nation and City of Vancouver meeting
May 30, 2022	Vancouver Heritage Commission
June 9, 2022	Chinatown Historic Area Planning Committee
June 13, 2022	Staff Resource Group
June 14, 2022	Women's Advisory Committee
June 15, 2022	Arts and Culture Advisory Committee
June 15, 2022	Gastown Historic Area Planning Committee
June 21, 2022	Persons with Disabilities Advisory Committee – Housing Subcommittee
June 23, 2022	Children, Youth and Families Advisory Committee
June 23, 2022	Vancouver Heritage Foundation, Heritage Vancouver Society, Vancouver Heritage Commission
June 27, 2022	Squamish Nation meeting
June 29, 2022	Vancouver City Planning Commission
July 4, 2022	Urban Indigenous People's Advisory Committee
July 21, 2022	2SLGBTQ+ Advisory Committee
July 22, 2022	Staff Resource Group
September 8, 2022	Racial and Ethno-Cultural Equity Advisory Committee
November 21, 2022	Vancouver Heritage Foundation Board of Directors
December 7, 2022	Staff Resource Group
December 9, 2022	Heritage Vancouver Society
January 16, 2023	Vancouver Heritage Commission
February 9, 2023	Musqueam Indian Band and Planning, Urban Design and Sustainability Department Summit
February 16, 2023	Squamish Nation and Planning, Urban Design and Sustainability Department Summit
June 2023	Written update to Squamish Nation on VHR Upgrade Project
October 11, 2023	Staff Resource Group
October 12, 2023	Heritage Vancouver Society

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October 12, 2023	Chinatown Historic Area Planning Committee
October 16, 2023	Vancouver Heritage Commission
October 16, 2023	Vancouver Heritage Foundation
October 17, 2023	Staff Resource Group
October 18, 2023	Gastown Historic Area Planning Committee
November 8, 2023	Musqueam Indian Band and Planning, Urban Design and Sustainability Department Summit
November 9, 2023	Children, Youth and Families Advisory Committee
November 22, 2023	Vancouver City Planning Commission
November 23, 2023	2SLBTQ+ Advisory Committee
November 27, 2023	Urban Indigenous Peoples' Advisory Committee
February 5, 2024	Vancouver Heritage Commission
February 5, 2024	Vancouver Heritage Foundation Board of Directors
February 14, 2024	Heritage Vancouver Society

Formal motions received by Advisory Bodies:

From the minutes of the Vancouver Heritage Commission meeting of May 30, 2022:

MOVED by Commissioner Pace SECONDED by Commissioner Gordon

> THAT the Vancouver Heritage Commission recognizes and supports the work to upgrade the Vancouver Heritage Register to be able to identify, embrace and celebrate a broad range of places with social, cultural and historic values, based on principles of reconciliation, diversity and equity; and

FURTHER THAT the Commission requests ongoing periodic engagement.

CARRIED UNANIMOUSLY

From the Chinatown Historic Area Planning Committee meeting of June 9, 2022:

MOVED by Julien Leger

SECONDED by Eric Siu

THAT the Chinatown Historic Area Planning Committee:

- 1. Supports the Vancouver Heritage Register Upgrade Project as presented on June 9, 2022; and
- 2. Requests consultation at significant milestones of the project.

CARRIED

From the minutes of the Gastown Historic Area Planning Committee meeting of September 21, 2022:

MOVED by Alyssa Myshok SECONDED by Gina Weaver

THAT the Gastown Historic Area Planning Committee:

- Recognizes and supports the work to upgrade the Vancouver Heritage Register to be able to identify, embrace and celebrate a broad range of places with social, cultural and historic values, based on principles of reconciliation, diversity and equity; and
- 2. Requests ongoing periodic engagement and clarification on opportunities for involvement by Committee members, specifically related to the conservation of the Gastown Historic District (HA-2).

CARRIED

From the minutes of the Vancouver Heritage Commission meeting of January 16, 2023:

MOVED by Commissioner Lam Maxwell SECONDED by Commissioner Massey

THAT the Vancouver Heritage Commission support staff work on the Vancouver Heritage Register Upgrade Project.

CARRIED UNANIMOUSLY

From the minutes of the Vancouver Heritage Commission meeting of October 16, 2023:

MOVED by Commissioner Ankenman SECONDED by Commissioner Massey

THAT the Vancouver Heritage Commission receive the Vancouver Heritage Register (VHR) Upgrade presentation, support it's direction and look forward to receiving further information on the VHR heritage evaluation methodology.

FURTHER THAT the Vancouver Heritage Commission support the clarity and streamlining of the new VHR policy methodology.

CARRIED UNANIMOUSLY (Commissioner Evans absent for the vote)

From the minutes of the Gastown Historic Area Planning Committee meeting of October 18, 2023:

MOVED by Adrian Watson SECONDED by Alyssa Myshok

THAT the Gastown Historic Area Planning Committee recognizes and supports the work to upgrade the Vancouver Heritage Register to be able to streamline data management processes, incorporate best standards, improve public accessibility, incorporate a values-based approach, simplify process, and clarify contents, while removing categories heritage can not control (such as trees). Further we support the Vancouver Heritage Register containing a Truth-telling Statement with land acknowledgements based on feedback from x^wməθk^wəyəm (<u>Musqueam</u>), Skwxwú7mesh (<u>Squamish</u>), and səlilwətat (Tsleil-Waututh) Nations.

CARRIED

From the Chinatown Historic Area Planning Committee meeting of November 9, 2023:

NB: This meeting did not achieve quorum, but the following motion was circulated via email by staff and passed via email as of Dec 20, 2023:

THAT the Chinatown Historic Area Planning Committee (CHAPC) received the Vancouver Heritage Register (VHR) Upgrade presentation and looks forward to receiving further information on the VHR heritage register evaluation methodology.

FURTHER THAT CHAPC supports the policy direction to simplify, update, and streamline the VHR evaluation methodology.

From the minutes of the Children, Youth, and Families Advisory Committee meeting of November 9, 2023:

MOVED by Andre Yeh SECONDED by Marcus Tse

THAT the Children, Youth and Families Advisory Committee support the Vancouver Heritage Register Upgrade as outlined in the presentation circulated.

CARRIED

(Miles Molhoj and Esther Moreno opposed)

From the minutes of the Vancouver Heritage Commission meeting of February 5, 2024:

MOVED by Commissioner Fraser SECONDED by Commissioner Gordon

> THAT the Vancouver Heritage Commission thank the participants of the Evaluation Methodology Workshop: Dr. Diane Archibald, Ph.D., Hilary Macdonald, Michael Gordon, Shawn Preus, Shelley Bruce, and Shirley Shen;

AND FURTHER THAT the Vancouver Heritage Commission endorse the VHR Upgrade Project, including the Evaluation Methodology, with the recommendation to clarify and explore the definitions of equity-denied groups and living culture.

CARRIED UNANIMOUSLY

APPENDIX E

Table A – Emerging Objectives

Category	Shortcomings	Emerging Objectives
VHR Heritage Evaluation Methodology	Architectural bias Bias towards tangible Age bias of original survey Bias against use Marginal consideration of socio-cultural values Lack of community consideration (diversity,	Review and update heritage evaluation criteria and evaluation template
	equity) Ranked evaluation system (A, B, C)	No grade evaluation methodology, without A, B, C ranking
VHR Policy Format and Content	VHR categories outside of the VHR's primary mandate (Streetscapes, Parks, Trees, Monuments, Archaeological Sites)	Remove categories (Streetscapes, Parks, Trees, Monuments, Archaeological Sites) from the VHR and place in the Appendix
		New format featuring two sections: VHR listings, and Appendix for removed categories
	Policy document outdated and content mixed with guidelines	Separate policy from guidelines content
	Policy document not legible and does not meet accessibility standards	New accessible fonts and formatting
VHR Policy Compliance	Inconsistent with: Vancouver Charter	Re-focus VHR policy to relate to real property, built-heritage resources (buildings and structures)
		Clarify the VHR purpose as primarily a land planning tool
		Adopt a values-based, community- centered approach to heritage evaluation
		Reconfirm the VHR as primarily a land- planning and built-heritage resources management tool
	Vancouver Heritage Program	Embrace diversity and equitable and inclusionary heritage management practices, best reflected in a new heritage evaluation methodology
		Continue developing policy framework for Intangible Cultural Heritage
	Standards and Guidelines	Effectively support the safeguarding and continuity of heritage values of places listed on the VHR
		Adopt a values-based, community-centred approach to heritage conservation and planning

VHR Data	Outdated Word-based data management	Transit to new integrated Excel-based
Management	platform	data management platform
	Convoluted update process requiring multiple department's involvement	Streamline the process to a single- point of entry data base update practice, incorporating best standards
	Public Accessibility	Improve public interfaces and user- friendliness
		Streamline data processing with Provincial heritage requirements
		Phased implementation (2024)
	Implementation timing	Current data base will be fully functional during the transition time without adverse impact on public service
Truth & Reconciliation UNDRIP Strategy	Truth & Reconciliation not reflected	Ensure ongoing engagement with MST nations and receive input
		Continue cooperation on developing Indigenous Cultural Heritage framework and tools
	No MST Nations input received	Support self-expressed priorities of the Nations regarding their cultural heritage and how they wish to be reflected in VHR

Table B – Key Deliverables

Key Change	Rationale & Guiding Principles	Expected Outcome
VHR Policy update - Removal of non-built heritage resources from Vancouver Heritage Register, and abandoning A, B, C grading	Alignment with Vancouver Charter, Vancouver Heritage Program and <i>Permitting Improvement Process</i> , prioritizing simplification of land-use policies through clarifying the scope of required heritage reviews for Vancouver Heritage Register listings	Clarity to VHR purpose by focusing on built heritage resources and land planning application Clarity of process for permit applications for Vancouver Heritage Register listings Reduced processing time related to heritage reviews and evaluation of heritage values of places
VHR Policy update - transition from outdated policy format to accessible COV policy template	Alignment with <i>Regulation Redesign & Development Process Review</i> initiatives, by updating and reformatting the VHR Policy and separating policy content from guidelines	Improved accessibility, legibility, and public access to both Policy and Guide documents
Updated heritage evaluation methodology -New Heritage Evaluation Template	Alignment with Canadian best practices, application of values-based, equitable, community-centered heritage evaluation approach, improved evaluation process and template	Improved eligibility for addition to the VHR, stronger inclusion of intangible values in evaluation of buildings, encouraged consideration of living heritage, diversity, and equity

Vancouver Heritage Register and Heritage Evaluation – public information for COV website	Standards & Guidelines for the Conservation of Historic Places in Canada Adopt a values-based approach for the management of heritage resources, as Heritage Conservation Effectively support the safeguarding and continuity of heritage values of places Diversity and Equity Embrace diverse heritage values and equitable and inclusionary	Old Policy and Guidelines replaced with improved documents; VHR guide and Evaluation guide integrated for improved public use at COV website
New VHR database and management plan (to be implemented in 2024)	Modernized database and system functionality, including single point of entry for updates and management, better integration with other City systems	Full implementation of the management plan Q2-Q4 2024
Inclusion of Truth- Telling Statement in Vancouver Heritage Register Policy	UNDRIP Strategy Incorporate direction received through Strategy into Vancouver Heritage Register Upgrade deliverables, such as Call to Action 4.7a Host Nation Feedback Support self-expressed priorities of the Nations regarding their cultural heritage and how they wish to be reflected in Vancouver Heritage Register	It begins to address COV UNDRIP Strategy Call to Action 4.7a, through inclusion of the Truth-Telling Statement Awareness regarding Truth & Reconciliation and UNDRIP for staff, public and developers Continued collaboration with MST Nations on developing understanding and tools for support of Indigenous Cultural Heritage
Permitting System Notes entered for properties identified as having heritage value through past consultant studies	Internal and external communication improvement for advance identification of heritage review requirements related to permitting processes	Potential heritage value of properties added for 1100+ added to Permitting System Notes, consolidating past consultant studies
Consequential Amendments	Remove reference to heritage "A" listed buildings due new evaluation methodology without categories	Heritage Polices, Section 6.2 to be repealed, and Zoning & Development By- law, Section 10, Paragraph 10.14.5 to be amended.

Table C - VHR Upgrade Project Scope & Timeline

	Phase	Timeline	Associated Activities & Deliverables
1	Research & initiate	Q2 2022	 Internal Literature Review Overview Vancouver Heritage Program (VHP; 2020) Identify other COV initiatives (Equity Framework, etc.) intersecting with heritage conservation and management External Literature Review

		1	
			 Jurisdictional scan of Canadian municipal heritage programs (heritage registers, inventories, and policies)
			Interview heritage leaders at select municipalities:
			 City of Toronto: Indigenous Heritage Engagement Project (IHEP) City of Victoria: Citizen-Led Heritage Conservation
			 Areas City of Hamilton: Built Heritage Inventory Strategy
			 Identify and review existing heritage management policies or directions from Musqueam, Squamish, and Tsleil-Waututh Nations
			Methodology Review
			 Review current best approaches to heritage conservation and management <u>Draft VHR Goals & Guiding Principles</u>
			Aligned with VHP Principles (e.g., equitable consultation)
2	Framework	Q3 2022 –	Internal Review: Heritage Evaluation Methodology and Process
	Development	Q2 2023	 Document methodology and workflow Analyze current heritage evaluation criteria Identify shortcomings re: equity and Reconciliation External Review: Current Methodologies in Heritage Evaluation & Management
			 Evaluation criteria for values-based approach (Can S&G ON Prov; City of Calgary) Evaluation criteria for intangible heritage values (UNESCO) <u>Proposed Upgrade:</u>
			 Clarify VHR purpose (conservation and preservation of real property); support the development of new policies and tools for cultural heritage Develop more equitable evaluation process Eliminate A, B, C grading system Draft Truth-Telling Statement Develop and Test: New Evaluation Criteria
			 Heritage evaluation process guide and form workshopped (2x) with SOS subcommittee, federal and UNESCO-level advisors
3	Content	Q3 2022 –	Internal Review and Analysis: VHR Regulatory Framework &
	Review	Q2 2023	Management Development of current VHR categories:
			 Buildings Monuments Trees Streetscapes Parks and landscapes Archaeological sites Public works Development of Current VHR Framework:
			 Technical reports (building and archaeological surveys, etc.) 1986 Vancouver Heritage Inventory (id. General principles, methodologies) 1994 VHR (id. General principles, methodologies)

			 Council meeting minutes and reports (1985-present) Current management documents Analyze to determine: How were categories developed? Criteria for each? Historical development of the decision-making process? Whose values are represented? What is protected/ conserved? Shortcomings Proposed Upgrade: Clarify VHR purpose (conservation and preservation of real property); support the development of new policies and tools for cultural heritage Eliminate categories (buildings, streetscapes, landscape resources, arch sites)
4	Outcomes & Implementation Planning	Q2 2023 – Q4 2023	 Acknowledge resources better protected by other plans, policies, bylaws Truth-Telling Statement review and comment; include in VHR Land acknowledgments VHR purpose clarified (buildings and structures), updated Schedule and Appendix Register Evaluation criteria updated (now values-based) Accessible data management system and presses
			 Accessible data management system and process Public interface Internal interface Cross-departmental support for development of new policies and tools to identify, protect, and manage cultural heritage (on Nations' preferred timelines)

Table D – Canadian Municipal Heritage Programs Survey

Municipality/ Group	Tool	Authority	Multiple	Intangible	Indigenous	Types of Resources	Categories	Grades
City of Toronto	Heritage Register	Ontario Heritage Act	Y Toronto Heritage Survey	N	N BUT project ¹ under developmen t	Majority buildings; cemeteries, trees, monuments	N Either designated or listed	N Formerly had grades
City of Ottawa	Heritage Register	Ontario Heritage Act	N	N	N	Buildings only	N	N
City of Hamilton	Heritage Register	Ontario Heritage Act	Y Built Heritage Inventory	N	N	Real Property - Buildings; one infrastructure resource (canal)	N Either designated, listed, or inventoried	N

¹ Toronto Heritage Survey/ Indigenous Heritage Engagement Project – identifies and preserves sites of historical and cultural significance to Indigenous communities (ONGOING)

City of Winnipeg City of	List of Historical Resources	Historical Resources By- Law	Y Nominated List Commerno rative List	N	N	Majority buildings one fountain, one metal cladding from demoed building, one memorial, one set of gates	N All designated	N No grades since 2014 Previousl y had Grades I- III w/ protectio n level tied to grade N
Victoria	Register	Government Act				Designated and Listed EXCEPT one NHS breakwater and docks		
City of Montreal	Heritage Databases Grand repertoire du patrimonies bati Inventory of municipal properties of heritage interest; Vieux- Montreal heritage	Cultural Heritage Act (Quebec)	Y	Ν	Ν	Buildings and Infrastructure	N Has searchable database; can search via criteria, but does not appear to have "categories"	Ν
Halifax Regional Municipality	Registry of Heritage Properties	Heritage Property Act of Nova Scotia	N	N	N	Buildings	N	N
City of Calgary	Inventory of Evaluated Historic Resources (evaluated by Heritage Calgary according to Council- approved policy)	Historical Resources Act (for municipally designated places)	Ν	N intangible heritage BUT place can be added based on intangible values of place alone	Y Archaeologi cal sites	Including but not limited to buildings, structures, archaeological sites, cultural landscapes, and parks	N Has searchable database; can search via criteria but does not appear to have "categories"	N
City of Edmonton	Register (Municipal Historic Resources)	Historical Resources Act	Y Inventory of Historic Resources (not designated)	N	Y 2020 – Ward names (and boundaries) changed to Indigenous names –	Buildings only; all designated	N	Ν

					wards listed in Register			
City of St. John's	Heritage Buildings List	St John's Heritage by- law (?)	Ν	N	N	Buildings only; all designated	N	N
City of Saskatoon	Heritage Register (also called Register of Historic Places)	The Heritage Property Act (for designations?)	Ν	N	N/Y Archaeologi cal sites can be added but do not appear to have any on the register Acknowledg ement of Indigenous presence (page 1) One listing of urban aboriginal school that sought to preserve First Nations cultural heritage	Buildings, structures, monuments, memorials, and natural and cultural landscapes	Y Bridges & infrastructure; cemeteries. Edu. facilities & schools; financial institutions; govt. facilities; health care & related facilities; hotels; monuments, memorials & public art installations; museums & galleries; office buildings; parks & natural areas; religious institutions & churches; residences; retail, commercial & service buildings; theatres, halls & clubs; warehouses & industrial complexes	Ν

APPENDIX F

Heritage Polices Amendment

Amendments to Council-adopted policies will be prepared generally in accordance with the provisions listed below, subject to change and refinement prior to posting. *Proposed amendments are shown in red. The proposed amendment is to repeal Section 6.2 from the Heritage Polices 2020, as shown in red:

6.2 Demolition of an "A" Listed VHR Building

Council has instructed that, prior to consideration of a proposal for the demolition of an "A" listed building on the VHR, a formal independent consultant's report on the physical/structural condition and economic viability of retaining and conserving the building, including a calculation of a density bonus, should be submitted to and reviewed by the Director of Planning. The consultant's report is to be paid for by the applicant. The report should provide an unbiased assessment of retention and conservation options.

Rationale: As the categorization (A, B and C) was removed from the upgraded VHR Heritage Evaluation Methodology and subsequently from the reformatted VHR too, the reference to category "A" became redundant.

APPENDIX G

Zoning & Development By-law Amendment

Subject to the approval of recommendation A, these amendments will be brought forward generally in accordance with Appendix G at a later time. The proposed amendment to the Zoning & Development Bylaw – Section 10 is to strike "as an "A" Evaluation Group heritage building" from 10.14.5., as shown in red:

10.14.5 Except as provided in sections 10.14.6 and 10.14.7, where development necessitates demolition of a building listed in the Heritage Register as an "A" Evaluation Group heritage building and located in the RM5, RM-5A, RM-5B, RM-5C, RM-5D, RM-6 or Downtown districts, a development permit will not be issued for the new development unless the applicant has complied with the provisions of section 10.14.4, except that the Director of Planning may also require that the applicant submit a calculation of density bonus to the City, to the satisfaction of the Director of Planning, before a development permit may be issued.

Rationale: As the categorization (A, B and C) was removed from the upgraded VHR Heritage Evaluation Methodology and subsequently, from the reformatted VHR too, as the reference to category "A" buildings became redundant.

This amendment (if approved at Public Hearing) would result with section 10.14.5 becoming applicable to all heritage buildings (266 sites) within the identified zoning districts, not just previously identified heritage "A" buildings (52 sites).

APPENDIX H

Intangible Cultural Heritage

Historically, definitions of cultural heritage were determined by colonial governments with a Euro-centric lens and bias. At the same time, the cultural heritage of Indigenous peoples and ethno-cultural communities were neglected, suppressed, and erased. This inequitable and narrow understanding of cultural heritage also resulted in intangible heritage often being separated and made invisible.

The City has adopted organization-wide frameworks and policies including the Reconciliation Framework (2014), the UNDRIP Strategy (2022), and the Equity Framework (2021) to guide our efforts in advancing these goals. As a foundational step, it is important that x^wməθk^wəýəm (Musqueam), Skwxwú7mesh (Squamish), and səlilwətał (Tsleil-Waututh) perspectives, views, and knowledges are reflected into today's definition of cultural heritage. The process to reframe the definition and approach must respect Indigenous peoples and the Nations' rights to self-determination and free, prior, and informed consent. This is also an opportunity to reframe our outdated understanding of cultural heritage to include both tangible and intangible aspects, to embrace the notion of stewardship over time, and to explicitly center the voices of communities whose cultural heritage has been neglected and suppressed.

Commemoration Program Summary (led by ACCS)

Commemoration Framework is currently under development, will establish an overarching set of priorities, principles, and processes to guide commemoration in City and Park Board. The framework will better reflect City and Park Board commitments to the rights of Indigenous people, reconciliation, redress, equity, and accessibility. Directly related to the VHR Upgrade are two administrative policy areas, (a) monuments, memorials, and plaques; and (b) naming and renaming, including Indigenous naming. The framework will also inform subsequent work on wayfinding and signage, functional commemoration such as water fountains or street furniture, cultural heritage sites and assets, Indigenous design principles, memorial plantings, and events that are city-led, supported, and permitted. The framework will be informed by and inform the Sponsorship, Naming Rights, and Donations policy which is currently under development.