

REPORT Development Services

To:	Mayor Coté and Members of Council	Date:	5/8/2017
From:	Jackie Teed Acting Director of Development Services	File:	13.2605.40
	Services	Item #:	211/2017

Subject: Queen's Park Heritage Conservation Area: Proposed Approach to Addressing Potential Impacts to Protected Properties

RECOMMENDATION

THAT Council direct staff to draft the Official Community Plan Amendment Bylaw, and other related bylaws for the Queen's Park Heritage Conservation Area, per the policy provisions of the Proposed Approach, as detailed in this report.

EXECUTIVE SUMMARY

This report outlines the provisions of a 'Proposed Approach to the Queen's Park Heritage Conservation Area', which is intended to address the concerns that were raised by community members regarding the potential impact on property values.

In a presentation to Council on April 24, 2017, Mr. Jay Wollenberg of Coriolis Consulting indicated that a majority of the properties in the proposed Heritage Conservation Area would either benefit or see no change in property value. However, Mr. Wollenberg also indicated that there are likely to be some properties for which the regulations associated with the Heritage Conservation Area could cause a decrease in market interest (and a resulting price/value decrease).

As a result, staff is proposing a revised approach to the Heritage Conservation Area that would include a new category: Special Limited Protection. This category would include the

properties that would have been included in the Advanced Protection category, under the policy direction endorsed by Council on May 1, 2017, but whose site characteristics might preclude them from taking advantage of possible incentives.

PURPOSE

The purpose of this report is to present Council with the provisions of a 'Proposed Approach to the Queen's Park Heritage Conservation Area' in order to address community concerns. Council could chose to direct staff to continue to work with the policy provisions endorsed on May 1, 2017, or the provisions of the proposed approach as presented in this report.

POLICY AND REGULATIONS

Heritage Conservation Areas

Enabled through Section 614 of the Local Government Act, a Heritage Conservation Area is a distinct neighbourhood, characterized by its heritage value, which is identified in a City's Official Community Plan (OCP) for heritage conservation purposes. The Heritage Conservation Area is an area management tool, which would include both heritage protection for existing buildings and design control for new construction.

A Heritage Conservation Area provides a layer of regulation in addition to that of the OCP and the Zoning Bylaw, which would continue to apply to all properties along with other citywide policies and bylaws. The Heritage Conservation Area would not remove development entitlements associated with zoning. All properties, protected or not, would continue to be able to build to the density and other requirements listed in the property's zoning, though the manner in which properties could be altered would be subject to City approval. Design control over entirely new construction could apply for any property in the area, if the level of heritage protection assigned to that property allowed the owner to replace an existing building.

The inclusion of a property within a Heritage Conservation Area does not require the permission of the property owner. The usual notification and public hearing requirements apply to the Bylaw that establishes the Heritage Conservation Area. Upon the implementation of a Heritage Conservation Area, there is no requirement for compensation of a property owner by the City in relation to any reduced market value of the property.

BACKGROUND

Concerns Raised Regarding Property Value

The public has expressed concerns about reduced property value in the potential Queen's Park Heritage Conservation Area. To address these concerns, staff invited Mr. Jay Wollenberg from Coriolis Consulting to speak at an Open Council Workshop on April 24, 2017. When Mr. Wollenberg spoke to Council, he indicated that a majority of the properties in the proposed Heritage Conservation Area would either benefit or see no change in their property value; however, there may be some which would be disadvantaged by the policy due to their characteristics (e.g., mainly lot and house size / Floor Space Ratio). Further concerns about these properties were brought forward through public delegations at the May 1, 2017 Regular Council meeting. As such, Council directed staff to explore ways to address the impacts to these properties through changes to the policy.

Endorsed Policy Provisions

On April 24, 2017, Council was presented with a variety of options for the structure of a Heritage Conservation Area for the Queen's Park neighbourhood. Council endorsed a policy which would see houses built in 1940 and earlier included in the Advanced Protection category, and houses built in 1941 or later included in the Limited Protection category.

Advanced Protection would require that an owner obtain a Heritage Alteration Permit (HAP) for the following:

- Major changes to the front, sides and visible roofline of the existing house;
- Demolition of the existing house;
- Construction of a new house, including related landscaping; and
- Subdivision or consolidation of the lot.

Limited Protection would require that an owner obtain a Heritage Alteration Permit (HAP) for the following:

- Construction of a new house, including related landscaping; and
- Subdivision or consolidation of the lot.

The provisions also included the ability for an owner of a house within the Advanced Protection category to apply for a HAP for demolition, which (should it be permitted), would move the property to the Limited Protection category; or to apply for an exemption to HAP requirements on the property entirely through an Official Community Plan amendment. Alternatively, properties could be moved from the Limited Protection category to the Advanced Protection category if the owner applies to list the existing house on the City's Heritage Register and the City agrees to the listing.

On May 1, 2017, Council endorsed a policy which included these heritage protection provisions and an accompanying set of administrative provisions. The details of those provisions are included in Attachment 1.

4

ANALYSIS

Potential Negatively Impacted Properties

On April 24, 2017, Mr. Wollenberg indicated that a majority of the properties in the Heritage Conservation Area would either benefit or see no change in their property value. However, Mr. Wollenberg also indicated that there are likely to be some properties for which the regulations associated with a Heritage Conservation Area would cause a decrease in market interest (and a resulting price/value decrease). Properties in which this is most likely to occur are those in which an existing building would be difficult or expensive to retrofit to a modern living standard. In some cases, an incentive (such as increased density) would offset the costs of the retrofit. However, Mr. Wollenberg noted there are likely to be a few properties for which density incentives would not be effective, due to the properties' characteristics such as size, shape, slope, or position of the house: the incremental density could not practically be accommodated on the site. Mr. Wollenberg stated that those properties could be negatively impacted by the proposed Heritage Conservation Area.

Staff has engaged Mr. Wollenberg to formally determine the defining criteria of these properties. Mr. Wollenberg has confirmed he can provide this information with sufficient time that staff could incorporate changed provisions of the policy in the bylaws for May 15, 2017.

Mr. Wollenberg is exploring combinations of the following criteria:

- Lot size;
- Total floor space in principal building;
- Floor space ratio; and
- Site coverage.

Incentives

As a next step, should Council adopt a Heritage Conservation Area for the Queen's Park neighbourhood, staff would begin an exploration, consultation and implementation process for proposed incentives.

As a starting point, staff has identified the following potential incentives, which were generally supported by the Working Group:

• Increase Floor Space Ratio (FSR) entitlement for Advanced Protection category properties to 0.7 – this would be generally in keeping with the density considered through current Heritage Revitalization Agreement applications. It would provide an incentive of between 0.1 and 0.2 FSR, depending upon the property's zoning (RS-6 or RS-1 respectively);

- Exempt full basements (i.e. portions underground with no windows) from FSR calculations. This would provide an exemption of non-visible portions of the building that do not contribute to building bulk, which is a key reason for limiting FSR for single detached dwelling properties; and,
- Support of Heritage Revitalization Agreement (HRA) applications that would permit the stratification to multiple-dwelling properties, and subdivision to small lot properties. This would continue to provide an additional incentive for full restoration and heritage designation of properties, as is generally required through an HRA.

PROVISIONS OF THE PROPOSED APPROACH

Given the concerns raised by the community and information presented by Mr. Jay Wollenberg, staff has explored provisions for a 'Proposed Approach for the Heritage Conservation Area' policy. The City has hired Coriolis Consulting to determine the criteria under which some houses may experience a decrease in value and not be able to benefit from the proposed incentives. Based on those criteria staff will determine the number of properties that would fall into the Limited Special category. This information would be available as part of the First and Second Reading report scheduled for May 15, 2017.

A summary table of the proposed approach is provided as Attachment 2. Further details on the provisions of this approach are listed below:

Revised Advanced (Protected)

The Advanced Protection category would continue to apply to properties built before 1900 up to 1940. However, it would not include properties which, due to their site characteristics would be included in the Special Limited category (see description below).

Advanced Protection would require that an owner obtain a Heritage Alteration Permit (HAP) for the following:

- Major changes to the front, sides and visible roofline of the existing house;
- Demolition of the existing house;
- Construction of a new house, including related landscaping; and
- Subdivision or consolidation of the lot.

Special Limited (Potentially Disadvantaged Properties)

The Special Limited Protection category would be a temporary category made up of properties which, based on the age of the building, would have been in the Advanced Protection category under the policy direction endorsed by Council on April 24, 2017,

though whose site characteristics might preclude them from taking advantage of possible incentives. The characteristics of this category would be developed by Coriolis Consulting. Those characteristics would be presented to Council on May 15, 2017.

The Special Limited Protection category would require that an owner obtain a Heritage Alteration Permit (HAP) for the following:

- Demolition of the existing house;
- Construction of a new house, including related landscaping; and
- Subdivision or consolidation of the lot.

As part of the scheduled policy review in 2019, properties in this Special Limited category would either be reclassified as Advanced or Limited, based on a detailed analysis of the heritage, economic and renovation potential of each property. After the review, the Heritage Conservation Area and related bylaws would be amended to discontinue the Special Limited category.

Limited (Non-Protected)

The Limited Protection category would remain as previously proposed and apply to buildings built in 1941 or later. Owners with properties in this category would be required to obtain a Heritage Alteration Permit (HAP) for the following:

- Construction of a new house, including related landscaping; and
- Subdivision or consolidation of the lot.

Voluntary Advanced

Under the provisions endorsed on May 1, 2017, owners of houses in the Limited Protection category, whose properties they feel have strong enough heritage merit, could initiate transition into the Advanced Protection category voluntarily by applying to list the house on the Heritage Register.

Staff is proposing that from the date of implementation until October 31, 2017, the City accept applications for transition from the Limited and Special Limited Protection categories into the Advanced Protection category. In November 2017, staff would prepare a City-led OCP amendment to move all those who have applied for voluntary Advanced Protection into that category.

The City could invite members of the Working Group, the Community Heritage Commission, the New Westminster Heritage Preservation Society, the Queen's Park Residents' Association and any other heritage advocates to collaborate with property owners in the neighbourhood who were interested in a voluntary application to the Advanced Protection category.

NEXT STEPS

Should Council proceed with the Heritage Conservation Area, the following next steps would be undertaken:

Official Community Plan Amendment Bylaw

Staff would work with City Solicitors to draft an Official Community Plan (OCP) Amendment Bylaw, which would bring the Heritage Conservation Area policy into effect. This bylaw would be presented to Council for First and Second Reading on May 15, 2017. The bylaw could reflect the policy provisions endorsed on May 1, 2017, or the provisions of the proposed approach presented in this report.

Amendments to Related Procedures Bylaws

Should a Heritage Conservation Area be implemented, the following four bylaws would be required to be updated to reflect the Heritage Conservation Area policy:

- 1. Heritage Alteration Permit Procedures Bylaw 7859, 2016
- 2. Heritage Procedures Bylaw 7606, 2013
- 3. Development Services Fees Bylaw 7683, 2014
- 4. Protected Heritage Properties Minimum Standards of Maintenance Bylaw 6498, 1998

The first three bylaws are procedures related, and the amendments would be for housekeeping purposes. The work on the Minimum Standards of Maintenance Bylaw, which requires a more significant update, would begin after implementation of the Heritage Conservation Area, should Council chose to proceed with the policy.

Incentives Work Plan

Staff is preparing a work plan for research and analysis of the incentive options presented to Council in the staff report of April 24, 2017. Staff would request Council's endorsement of the work plan at the same time as requesting First and Second Reading of the Heritage Conservation Area bylaws.

Timeline

Action	Proposed Date
Consideration of First and Second Reading of OCP Amendment Bylaw	May 15, 2017
(including Incentives Work Plan)	
Public Hearing and Consideration of Third Reading and Adoption	June 13, 2017

INTERDEPARTMENTAL LIAISON

Staff is providing updates to the other Departments on this work on an ongoing basis.

OPTIONS

The following options are presented for Council's consideration:

- 1. That Council direct staff to draft the Official Community Plan Amendment Bylaw, and other related bylaws for the Queen's Park Heritage Conservation Area, per the policy provisions of the Proposed Approach, as detailed in this report.
- 2. That Council direct staff to draft the Official Community Plan Amendment Bylaw, and other related bylaws for the Queen's Park Heritage Conservation Area, per the policy provisions endorsed by Council at the May 1, 2017 regular meeting.
- 3. That Council provide staff with alternative direction.

Staff recommend option 1.

ATTACHMENTS

Attachment 1: Provisions of the Queen's Park Heritage Conservation Area Policy and Accompanying Administrative Policy, as Endorsed on May 1, 2017 Attachment 2: Summary Table of the Proposed Approach

This report has been prepared by: Britney Quail, Heritage Planning Analyst

This report was reviewed by: John Stark, Acting Manager of Planning Approved for Presentation to Council

Johnth Sy

For: Jackie Teed Acting Director of Development Services

2. Roune

For: Lisa Spitale Chief Administrative Officer



Attachment 1

Provisions of the Queen's Park Heritage Conservation Area policy and accompanying Administrative Policy, as endorsed on May 1, 2017

Proposed Conservation Area Policy Provisions

There are approximately 700 residential properties (zoned RS-1, RS-2, RS-5, or RS-6) which would form part of the Heritage Conservation Area. Approximately 500 of those properties would be protected, and require Heritage Alteration Permits for changes to the existing building (including demolition). The provisions of the policy which would be used to create the required bylaws would be as follows:

- The Heritage Conservation Area would apply to the Queen's Park neighbourhood, bounded on the north by Sixth Avenue, on the south by Royal Avenue, on the west by Sixth Street, and on the east by the 75.5 acre Queen's Park.
- All single detached dwelling buildings constructed in 1940 or earlier, currently listed on the Heritage Register, or Designated would be in the Advanced (Protected) category of the Conservation Area. For these properties, the following activities would require that the owner obtain a Heritage Alteration Permit from the City prior to obtaining other required City permits:
 - Construction activities on the front, sides or visible roof of the existing principal building;
 - Demolition of the existing principal building;
 - Construction of a new principal building or new accessory buildings, and associated landscaping; and
 - Subdivision or consolidation of the lot.
- All single detached dwelling buildings constructed in 1941 or later would be in the Limited (Non-Protected) category of the Conservation Area. For these properties, the following activities would require that the owner obtain a Heritage Alteration Permit from the City prior to obtaining other required City permits:
 - Construction of new principal building or accessory buildings, and associated landscaping; and
 - Subdivision or consolidation of the lot.
- Multiple-unit residential buildings which are on property zoned under a Single Detached Dwelling district would form part of the Heritage Conservation Area and would be subject to the provisions according to their year of construction.
- Properties within the Queen's Park neighbourhood zoned for Commercial (C), Institutional (P), Mid-rise multiple-dwellings (RM), and Town house/ multipleunit-residential (RT) would not form part of the Heritage Conservation Area, and as such would not be subject to the provisions.

- No Schedule of Protected Properties would be established within the Heritage Conservation Area. Properties currently on the Heritage Register or Designated would remain as such, as well as be added to the Advanced (Protected) category.
- For Advanced (Protected) category houses, some work that may not otherwise require a Building Permit may require an HAP, including:
 - Alterations to the location, dimension or framing of any door or window on the front façade or side elevations of a protected building;
 - Alterations to the design or material composition of any verandah or porch (including railing) on the front façade or side elevations of a protected building;
 - Addition of skylights and solar panels to roofs, if visible from the street;
 - Alteration of the design or material of significant architectural details.
- For Advanced (Protected) category houses, the following work would not require an HAP:
 - Interior renovations, changes to the back of the building, and changes to the non-visible rear roof, including additions of skylights and solar panels to these areas;
 - Changes to an existing non-residential accessory building;
 - Regular maintenance and repairs to the building, which would include reroofing with similar material, painting, or replacing worn siding or porch boards with in-kind materials. Regular maintenance would not include removal or replacement of heritage elements or a change in design, material or general appearance;
 - Changes to existing landscaping and/or landscape maintenance including weeding, mowing, annual or seasonal planting, dirt bed planting, and pruning of shrubs; and
 - Removal of trees (unless a Designated Heritage Tree), which would instead remain subject to the City's Tree Protection and Regulation Bylaw 7799, 2016.
- The Heritage Conservation Area would include mandatory design guidelines for existing Advanced (Protected) category houses, and all new building construction and their associated landscapes. Laneway or carriage house construction would be required to meet both the Heritage Conservation Area design guidelines and the laneway/ carriage house design guidelines, should Council approve that housing form.
- Advanced (Protected) category houses would not be required to retroactively upgrade their building to the standards of the design guidelines. Only new

construction would be required to meet these standards. Furthermore, new construction on one portion of the property would not trigger required upgrades on other areas of the property.

- For Limited (Non-Protected) houses, an HAP is not required for changes to the existing principal building unless the structure is substantially altered (70% or more of the house is dismantled or removed, as identified in current Building Permit regulations) at which point the design guidelines for new construction would apply and an HAP would be required.
- The Official Community Plan and the Zoning Bylaw would continue to apply to the properties in the Heritage Conservation Area along with other city-wide policies and bylaws.

Proposed Administration Policy Provisions

The Heritage Conservation Area Administration Policy would outline the requirements and process for demolition and renovation of Advanced (Protected) category buildings, new building construction, and requesting removal from the Advanced (Protected) category of the Heritage Conservation Area.

The following provisions are proposed for each application type:

Applications for Exterior Renovations

- Renovation applications would require submission of photographs of the existing house, a design rationale, and proposed site plan and elevations, including proposed list of materials.
- Applications would be evaluated by staff against the design guidelines. In cases where interpretation of the design guidelines requires further analysis, the Standards and Guidelines for the Conservation of Historic Places in Canada, adopted by Council in 2008 as a best-practice manual for the evaluation of heritage projects in the City, would be the guide. Staff would work with applicants to address any aspects of the proposal that did not meet the intent of the design guidelines.
- The City would have the authority to deny an HAP until the proposed changes were deemed to be consistent with the design guidelines.
- Staff recommends that Council delegate the authority for approval of renovation HAPs to the Director of Development Services.

- Applicants would have the option to appeal to Council should they disagree with the decision of Council's delegate.
- Staff recommends that no fee be charged for renovation permits. The estimated cost for these applications would be recovered through slightly higher charges for demolition and new building HAP, and OCP amendment applications.
- Once an HAP has been issued, the applicant would be able to apply for other required City permits.

Applications for Demolition

- Demolition application would require submission of a heritage assessment prepared by a heritage professional with membership in the Canadian Association of Heritage Professionals (CAHP). Applicants could choose to also provide other information in support of their application, such as conditions assessment, restoration quotes, etc. The preparation of all submission materials would be at the cost of the applicant.
- Applications would be evaluated by staff using an evaluation check-list to ensure transparency and consistency. To complete the checklist, staff would evaluate the application against guidelines which were informed by the neighbourhood's Statement of Significance (2017), a Neighbourhood Context Statement (2008), and the work of the Queen's Park Working Group (2015). The evaluation would take into consideration:
 - o potential to achieve density entitlements without eliminating heritage value;
 - heritage merit of the building; and,
 - condition of the building, including the degree to which heritage elements remain.
- The checklist would provide a "score", with applications achieving below a certain baseline score being considered reasonable for demolition. The City would have the authority to deny an HAP for applications achieving a score equal to or above the baseline score.
- Staff recommends that Council delegate the authority for approval of demolition HAPs to the Director of Development Services.
- Applicants would have the option to appeal to Council should they disagree with the decision of Council's delegate.

- Should the demolition HAP be rejected, the owner would be able to apply for a renovation HAP which would be reviewed according to that process. The City would work with the applicant to identify how the existing entitlements could be achieved through renovation to the existing building, in compliance with the design guidelines.
- Should the demolition HAP be approved, the applicant would be able to apply for a demolition permit.
- Demolition HAPs would have an expiry date of three years from issuance, which would allow owners to plan ahead.
- Staff recommends that a fee of \$1,430.00 be charged for demolition HAPs. This fee represents the estimated cost recovery for Development Services staff review (\$930.00) and a cost recovery charge for Legislative Services notification (\$500.00) where required.
- In addition, an applicant would be required to pay in the order of \$1,500.00 as a consultant fee for their heritage assessment. This would mean a total cost for the HAP application of about \$2,930.00. This would not include fees associated with the Building or Demolition Permit, should the application be approved.

Applications for New Building Construction

- New building construction applications would require submission of proposed site plan and elevations, including proposed list of materials, and a street context rendering.
- Applications would be evaluated by staff against the design guidelines. This would include an analysis by staff of the characteristics of the streetscape and buildings on both sides of the subject property's block to determine the key aspects within which the new building must seek to "fit in". Applicants would be encouraged to apply for their HAP permit and receive this evaluation prior to finalizing the design of their new house.
- The City would have the authority to deny an HAP until the proposed building were deemed to be consistent with the design guidelines and "fit in" with the streetscape context.
- Staff recommends that Council delegate the authority for approval of new building HAPs to the Director of Development Services.

- Applicants would have the option to appeal to Council should they disagree with the decision of Council's delegate.
- Staff recommends that a fee of \$930.00 be charged for HAPs for new construction. This fee represents the estimated cost recovery for Development Services staff review.
- Once an HAP has been issued, the applicant would be able to apply for other required City permits.

Applications to Move Between Protection Levels

- The owner of a property in the Limited (Non-protected) category could apply to the City to have their property protected. The owner of a property in the Advanced (Protected) category could also apply to have their property protected more strongly. Such applications would be made via the following:
 - Voluntary application to list the house on the Heritage Register or to Designate. This application would follow the current City process for such applications. No fee is currently associated with these applications.
 - Application for a Heritage Revitalization Agreement. Though the City would explore incentives for the Queen's Park Heritage Conservation Area as a next step should the Heritage Conservation Area be approved, there would remain the opportunity for property owners to negotiate additional incentives in exchange for full restoration and Designation of the house.
- The intent of the Heritage Conservation Area is to protect buildings from 1940 and older, and to ensure the design of new buildings "fits in" with neighbourhood character. The demolition HAP application process provides the appropriate means for owners to have their property evaluated to determine if it may be removed from protection through demolition. As such, it is unlikely that staff would support applications to move from the Advance category into the Limited category. However, an owner could apply to the City to do so, regardless of the building's construction date, through an Official Community Plan (OCP) amendment, as follows:
 - Given that this would effectively permit the building to be demolished or renovated without the requirement for City review, such an application would be evaluated using the same submission requirements and evaluation criteria as the demolition HAP application process.
 - Applications would be processed under the City's typical OCP application process for heritage-related land use applications, including review by the

Community Heritage Commission and Advisory Planning Commission, and would be considered for adoption by Council.

- Staff recommends \$1,860.00 would be charged for these applications. This fee represents the estimated cost recovery for Development Services staff review (\$930.00) and a cost recovery charge for the mandated Public Hearing (\$930.00).
- In addition, an applicant would be required to pay in the order of \$1,500.00 as a consultant fee for their heritage assessment. This would mean a total cost for the HAP application of about \$3,360.00. This would not include fees associated with the Building or Demolition Permit, should the application be approved.



Attachment 2

Summary Table of the Proposed New Approach

Property Category	Definition	Conservation Area Requirements	Next Steps: prior to June 13, 2017	Next Steps: post June 13, 2017
NEW Advanced Category	1800-1940	Demo HAP required Reno HAP required	Outline scale of incentives to be considered (e.g. how much additional FSR, which	June 2017 through January 2018 – develop robust density and other incentives
Properties 1800-1940 minus Limited "Special" Category properties		New Construction HAP required	exemptions for floorspace)	 February through March 2018 – City initiated OCP and zoning changes
NEW Limited "Special" Category	1940 and older, meeting physical criteria that may result	Demo HAP required New Construction HAP required	Engage Coriolis to prepare preliminary evaluation of Queen's Park properties and	 January 2018 – January 2019 conduct detailed heritage, economic, and renovation potential analysis of these
Were considered "Advanced" as per age of the building but due	in loss of value that cannot be mitigated via incentives		identify criteria for Limited "Special" category	properties to determine which should be in Advanced and Limited categories
to physical characteristics may not realize economic value from possible incentives				 January 2019 conduct two-year review of conservation area, including proposed OCP amendment to move Limited "Special" properties into appropriate Advanced or Limited category based on above analysis
Limited Category	1941 – current	New Construction HAP required	N/A	N/A
NEW Voluntary Category	Properties in Limited or Limited "Special" categories where property owner voluntarily places house into New Advanced category	 Would be placed in NEW Advanced, with those requirements 	N/A	 June 14, 2017 – October 31, 2017 – City accepts applications for submission to New Advanced Category. November 2017 – staff prepares City-led OCP amendment to move all voluntary properties into that category Invite Working Group and other heritage advocates to collaborate with property owners in the neighbourhood for voluntary applications
New Construction		 Mandatory design guidelines and HAP required 	N/A	 Review of design guidelines as part of two-year review of conservation area
Control Period Properties	Properties which were denied demolition HAP application through control period	Demo HAP currently required	Re-consider properties whose demo HAP applications were denied through the control period	N/A