

May 31, 2019

Ms. Lorraine Dooley  
Ministry of Tourism, Culture and Sport  
401 Bay Street  
Suite 1800  
Toronto, ON  
M7A 0A7

Dear Ms. Dooley:

**Re: ERO 019-0021 – Bill 108**

**Bill 108 - (Schedule 11) – proposed Amendments to the Ontario Heritage Act**

The Town of Halton Hills has reviewed the proposed amendments to the Ontario Heritage Act as identified in Bill 108 (Schedule 11). Staff report ADMIN-2019-2021 was endorsed by Town Council on May 27<sup>th</sup>, 2019 along with a related resolution opposing the proposals contained within Bill 108. Both report ADMIN-2019-0021 and the Council resolution 2019-0102 are attached to this submission.

As it relates to the changes proposed to the Ontario Heritage Act via Schedule 11 to Bill 108, the Town offers the following comments.

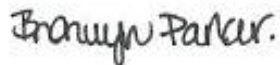
1. Under the proposed legislation, municipalities will be required to notify owners if their property is not formally designated but has been included on a heritage registry.
  - The Town has already been providing this type of notice during the development of our Comprehensive Heritage Registry, and has no concerns with this proposed amendment.
2. It is proposed that the municipal heritage register now include the legal description of the property; the name and address of the owner; a statement explaining the cultural heritage value of the property and a description of the heritage attributes of the property.
  - The Town offers no concerns with this proposed amendment.

3. As proposed by Bill 108, owners will have the ability to object to a municipality's decision to list a property and further, would be able to appeal to LPAT should they believe their lands are not appropriately designated as a heritage property on the municipal list.
  - Similar to the comments provided through ERO-019-0016, the Town is concerned with the increased authority LPAT appears to have under the proposed changes via Bill 108. This removes the decision making authority of local Councils, and undermines local priorities.
4. Timeframes regarding providing notice are also proposed. Municipalities will be required to provide notice to owners within 30 days of a decision to list a property on a heritage register.
  - Regulations not yet available for review which will prescribe what the notice must include, are required to be released and evaluated before the Town can comment fully on the changes proposed to notice requirements.

To conclude, Bill 108 is an omnibus bill, containing many amendments to various pieces of legislation. Changes related to Bill 108 will have implications for the Town of Halton Hills. Given the regulations which will presumably clarify many of the outstanding elements related to the changes proposed through Bill 108 have not yet been released, the Town is not able to finalize comment on the impacts of the proposed amendments to the Ontario Heritage Act at this time.

Council for the Town has unanimously identified a lack of support for the amendments proposed by Bill 108, and await Provincial direction regarding changes to the currently drafted amendments.

Sincerely,



Bronwyn Parker, MCIP, RPP  
Manager of Planning Policy

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encl. Report ADMIN-2019-2021  
Resolution 2019-0102