

Sandra Shaul
Vice-Chair, Toronto Preservation Board
6 Kendal Avenue
Toronto, ON M5R 1L6
Sandra.shaul@sympatico.ca and 416-923-5809

May 31, 2019

Hon. Steve Clark
Minister of Municipal Affairs and Housing
College Park 17th Floor, 777 Bay St, Toronto, ON M5G 2E5
minister.mah@ontario.ca

Dear Minister:

Re: Proposed Changes to the Ontario Heritage Act (OHA) under Bill 108

I am writing on behalf of the City of Toronto Preservation Board, the city's municipal heritage committee, to express our concern with the government's hurriedly composed policy revisions with regard to the OHA under Bill 108.

The proposed changes show a partiality to the building and development industry through timelines that make it extremely difficult for the City of Toronto and other municipalities to complete required background research, consultation with property owners, requirements for City Council decisions and the writing of designation bylaws for heritage properties. The ambiguous wording of the proposed changes and the recommended new process complicates, rather than simplifies, the existing heritage designation methodology.

The government's proposed changes, for reasons that are unclear, eliminate most of the decision-making powers of municipalities in favour of the LPAT. If it is the government's reasoning that the proposed changes are to increase efficiency, it does not appear to have taken into consideration that LPAT's timelines, which are already very long, will be even lengthier as more issues require settlement through the organization.

We have been told your government is working with municipal heritage professionals and bureaucrats to understand the proposed changes. Therefore, for the sake of clarity and planning, we strongly request that your revisions are presented with accompanying regulations before the final reading and vote on the proposed revisions to the OHA under Bill 108 so fully informed consultation is provided through both public meetings and written comments.

Thank you for your consideration.



Sandra Shaul
Vice-Chair, Toronto Preservation Board, and Members of the Board Robert Allsopp, Barbara McPhail, Paul Farrelly, Geoff Kettel, Brian Mooney, Rick Schofield