



ARCHITECTURAL
CONSERVANCY
ONTARIO

12 May 2026

Hon. Doug Ford, Premier
Legislative Bldg., Rm 281
Queen's Park
Toronto, Ontario M7A 1A1

Dear Mr. Ford,

Re: Looming expiry date for protection of heritage properties listed under the *Ontario Heritage Act*

We are writing to express our concern regarding the upcoming expiry (December 31, 2026) of the two-year extension of listed heritage properties on municipal registers. You will recall that an initial two-year extension provided in 2024 required an amendment to the *Ontario Heritage Act*, but a further extension can be made as a regulation.

Succinctly stated, under the current two-year extension, any heritage property listed on a municipal register as of December 31, 2026, shall be removed from the register on January 1, 2027, unless that council has given notice of its intention to designate the property under the Act. Properties that lose listing status cannot be re-listed for another five years.

Unfortunately, according to a recent (2026) survey by Community Heritage Ontario, the upcoming deadline affects some 21,000 currently listed heritage properties in municipalities across the province. Such properties have only limited, short-term (60 day) protection. As the Architectural Conservancy of Ontario (ACO) warned in its request for an initial extension in 2024, forcing municipalities to designate all of their listed properties within a short period of time — or drop them from the register — was draconian and unrealistic.

While municipalities and heritage stakeholders appreciated your government's initial 2024 extension, the expiry date is now less than eight months away. Municipalities, especially the smaller ones, are still under enormous pressure to review their registers and prioritize properties for designation or other protection. The staff/financial cost in research alone is enormous – and there are not enough trained staff to handle the work.

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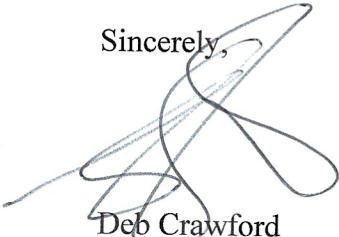
The past, Our present, Your future.

The municipal elections scheduled for later this year present an additional obstacle to municipalities taking action before the end of year. We are asking for a practical, administrative adjustment that helps municipalities deliver on provincial heritage and planning objectives, prevent demolition of buildings that anchor community identity and economic activity and support adaptive re-use – one of the most cost-effective forms of development. Doing so aligns with the government's focus on strong, competitive, and economically vibrant communities.

Furthermore, automatically removing listed properties from the registry in less than eight months will encourage demolition of potential affordable housing alternatives at a time when we need them the most.

Given the above, ACO is asking for a simple regulation under the *Ontario Heritage Act* granting a further extension for three years (from January 1, 2027, to January 1, 2030. The certainty of an additional three years for implementation would give municipalities the needed opportunity to complete this long overdue process while balancing competing pressures and supports the implementation and delivery of the Government's priorities.

Sincerely,



Deb Crawford
President, Architectural Conservancy of Ontario (ACO)

Cc: Hon. Graham McGregor, Minister of Citizenship and Multiculturalism
Hon. Peter Bethlenfalvy, Minister of Finance
Travis Kann, Chief of Staff to the Premier

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