



**ARCHITECTURAL  
CONSERVANCY  
ONTARIO**

November 16, 2022

Isaiah Thorning, Committee Clerk

**Standing Committee on Heritage, Infrastructure and Cultural Policy**

Whitney Block, Room 1405

99 Wellesley St. W.

Toronto, On M7A 1A2

Architectural Conservancy Ontario (ACO) is the province's lead non-government voice for the conservation of Ontario's built and cultural heritage.

ACO is extremely disappointed not to be invited to speak to the committee about the grave impacts Bill 23 and the changes to the Ontario Heritage Act will have on Ontario's cultural heritage.

Attached is the **power point presentation** prepared in anticipation of an opportunity to speak to you. The presentation focuses on just one of the many misguided proposals in Schedule 6 of the bill: increasing the number of criteria to be met for the protection of heritage properties. This simple change will effectively exclude many heritage places of importance to Indigenous, Black and other marginalized communities who celebrate their culture in this province.

Attached also is ACO's **full written submission on Schedule 6** to Bill 23. We urge you to read it.

Here are the main points to consider:

1. Heritage buildings and places provide a wealth of opportunities for use and development for housing and other purposes. To suggest that heritage inhibits

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housing misunderstands how our systems work. Heritage protections DO NOT RESTRICT USE.

2. Listing of heritage properties on heritage registers is a widely-used, transparent planning tool to flag heritage properties and provide limited (90 day) protection. The proposed changes to the listing mechanism, especially imposing a two-year expiry on listed properties, will effectively destroy the usefulness of listing. Tens of thousands of heritage properties will lose what small protection they have.
3. The increase in the threshold for designation from one criterion for heritage value to two is incoherent and contrary to international norms. As outlined in the power point presentation, this will have a disproportionate effect on BIPOC and other marginalized communities.
4. Changes affecting the Standards and Guidelines for Conservation of Provincial Heritage Properties give the government the power to interfere with the evaluation process for provincially owned heritage properties and exclude sites, such as Ontario Place and the Foundry in Toronto, from its own rules. Instead of leading by example, the government is opting for convenience and go-arounds.

Overall, the changes to the Ontario Heritage Act will have a devastating effect on the ability of Ontario's communities of all sizes and kinds to preserve and protect the places we cherish and hold dear. The multicultural impact, with its anti-inclusionary effects, alone is an embarrassment to the Minister of Citizenship and Multiculturalism.

These proposals will have NO DISCERNIBLE EFFECT ON HOUSING STARTS and will increase uncertainty and unpredictability in land use planning decisions.

**ACO strongly recommends that the changes to the Ontario Heritage Act be removed from Bill 23.**

The government must genuinely consult with heritage organizations and municipalities before proposing further changes.



Diane Chin

Chair of ACO