

December 13, 2022

Premier Doug Ford
premier@ontario.ca



ARCHITECTURAL
CONSERVANCY
ONTARIO

Re: Bill 23 Bombs Heritage — Request for a meeting regarding Schedule 6 of Bill 23

Premier Ford,

We are writing to express our concerns regarding the poorly considered provisions for heritage conservation contained in Bill 23. We were disappointed that there were no provisions to incentivize the conversion of existing buildings to housing, nor promised changes to the Ontario Building Code that might make conversion and infill more economically feasible.

ACO recently conducted a [media event](#) at the Queen's Park Media studio where we outlined concerns regarding various provisions of the Bill which could result in unnecessary losses of countless community landmarks. We also issued a [media release](#) and have already gathered nearly 6000 signatures on an [online petition](#). We were disappointed not to be able to speak at Committee hearings. We made a written submission. We have also submitted [comments](#) through the Environmental Registry of Ontario.

There is no evidence that heritage conservation frustrates housing provision, and plenty of evidence that when an unprotected community landmark is demolished, the public reaction is swift and unforgiving, with extreme frustration at the loss of both cultural and environmental value and material.

It is not an exaggeration to say that in two years, when municipalities will be forced to remove listed protection from most of the 31,000 or more heritage properties across Ontario, that it will start to rain buildings. Every time a community loses an unprotected landmark they will be blaming the poor judgement of the provincial government. A forced time limit (two years) to move so many properties to designation makes no sense. Designation would be unnecessary in most cases were it not for the looming deadline.

Equally unnecessary is the switch to two criteria instead of one. That second criterion will prevent designation of many properties with overwhelming cultural value like the Potter's Field Burial Ground in Owen Sound, which contains unmarked graves of 1300 indigents, including many black settlers fleeing slavery: it would meet only one criterion. Nowhere in the world is a two-criteria system in place.

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The powers given to cabinet to overrule the provincial Standards and Guidelines for Conservation of Provincial Heritage Properties, and interfere with the professional evaluation process, endanger every provincially owned heritage site. In combination with provincial expropriation powers there is vast potential for serious mistakes that will trigger public anger and cost future generations their sense of belonging.

We cannot emphasize too strongly how costly these changes will be to heritage in Ontario. We would like to meet to discuss our concerns at your earliest convenience.

Yours sincerely,

A handwritten signature in cursive script, appearing to read "D. Chin".

Diane Chin
Chair, Board of Directors
Architectural Conservancy Ontario r