

THE BEACH & EAST TORONTO HISTORICAL SOCIETY

John Ells, President, 52 Rainsford Road, Toronto ON M4L 3N6, ellisjohn@rogers.com, 416-694-3288
WWW.TBETHS.COM

Submission to:

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

Bill 23

The More Homes Built Faster Act

November 17, 2022

The Beach and East Toronto Historical Society (“TBETHS”) appreciates the opportunity to address the Committee to provide comments, as well as to express serious concerns we have, in relation to Bill 23, the proposed *More Homes Built Faster Act, 2022*.

Comments

TBETHS is a volunteer-based society that plays a large role in contributing to creating healthy communities and livable neighbourhoods. Bill 23 appears to take no recognition of the role of local historical societies, nor the effect that the Bill’s proposed gutting of heritage protection of properties may have on the motivation for volunteers to continue to donate their time to the worthy cause of preservation of heritage properties in their communities.

As a local heritage society in the east end of Toronto, our concerns relate primarily to changes proposed under Bill 23 to the *City of Toronto Act, 2006*, *Municipal Act, 2001*, *Ontario Land Tribunal Act, 2021*, *Planning Act* and, most of all, *Ontario Heritage Act*.

In TBETHS’ view, the proposed amendments to these statutes are far-reaching, make sweeping changes to well thought out planning processes, take away authority from bodies that have knowledge and expertise, dismiss community interests, and will render the preservation of our heritage irrelevant.

We note with concern:

- The apparent belief and message of Bill 23 that housing and heritage conservation are antagonistic and irreconcilable planning objectives.
- The removal of meaningful participation by volunteer organizations (such as TBETHS) in appeals before the Ontario Land Tribunal.
- The removal of power from municipalities (including the City of Toronto) to regulate exterior design and the appearance of elements and facilities through the site plan control process.
- The proposed requirement that properties included in a municipality’s heritage register must be de-listed if:

- they are not designated under Part IV of the *Ontario Heritage Act* within two years of their inclusion on the register and, once de-listed, cannot be placed back onto the register for five years and
- properties which are included on a municipality's heritage register when Bill 23 comes into force must be removed from the register If they are not designated within two years of the Bill coming into force.
- The absence of information on proposed regulations outlining new criteria for designating Heritage Conservation Districts.

TBETHS disagrees with the apparent belief and message of Bill 23 that housing and heritage conservation are antagonistic and irreconcilable planning objectives.

No evidence has been presented that the application of current heritage conservation measures either prevent or significantly delay housing development.

To the contrary, it has been TBETHS' experience that both planning objectives can work in harmony. Condominium developments in the east end of Toronto at Bellefair Ave. and Queen Street E. (Exhibit 1.), and at Kingston Rd. and Queen Street E. (Exhibit 2.), demonstrate how housing developments proceeded with respectful inclusion of heritage assets without causing undue delays.

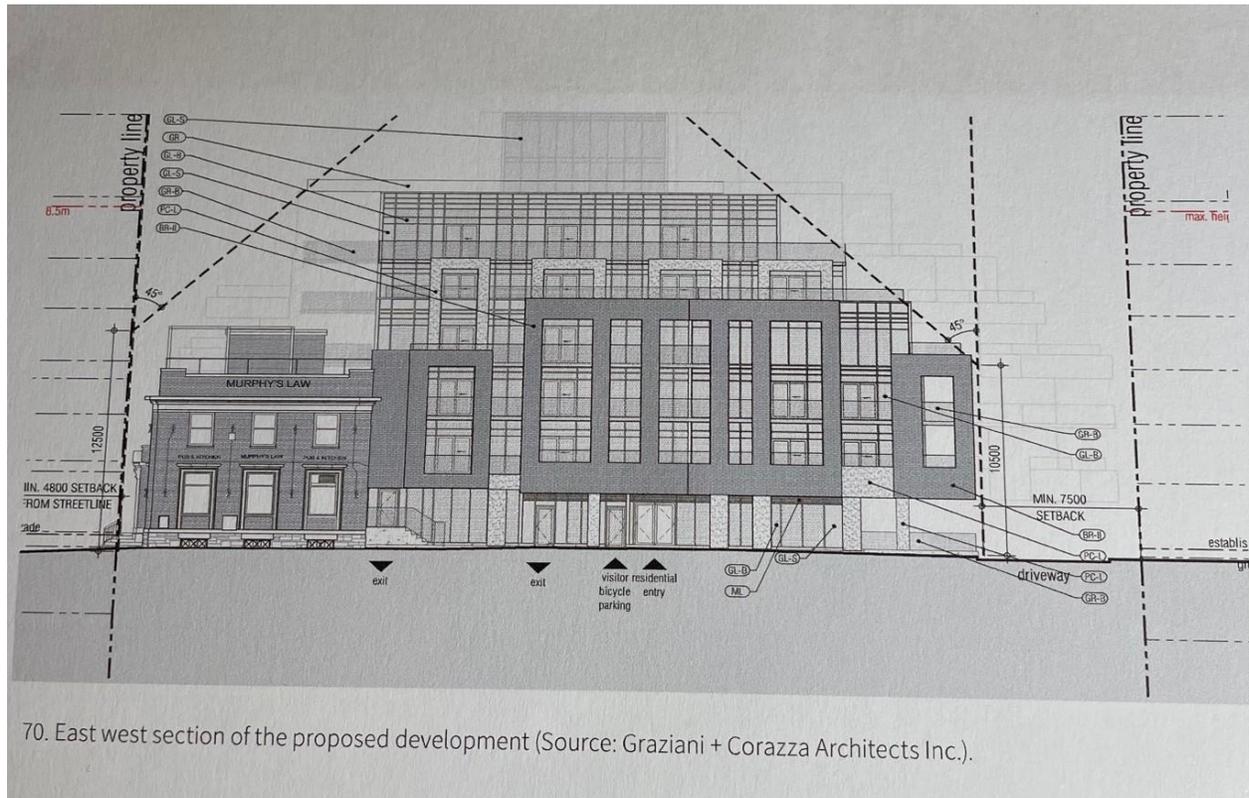
Exhibit 1.

In this example, the congregation of the former Bellefair United Church was prepared to make their property available for housing and street level retail, provided there would be respect for the heritage architecture of the building and visual history of the neighbourhood. This was willingly accommodated in the redevelopment proposal.



Exhibit 2.

In this example, the redevelopment proposal included a very thorough heritage study which recommended retaining the Murphy's Law Pub. This proposed heritage preservation component of the re-development was well received and supported by both TBETHS and the City of Toronto Planning Department. There was absolutely no delay created by this accommodation.



More examples can be found at 292 Main Street and many other parts of Toronto. As a rule, when redevelopment is proposed, it has been our experience that conservation interests in buildings are only raised when they meet the required provincial heritage criteria.

In particular, and as noted above, TBETHS vehemently objects to the provisions of Bill 23 which require that properties included in a municipality's heritage register must be de-listed if they are not designated under Part IV of the *Ontario Heritage Act* within two years of their inclusion on the register, and, once de-listed, cannot be placed back onto the register for five years.

It is extremely worrisome that this requirement also applies to properties which are included on a municipality's heritage register when Bill 23 comes into force, requiring that they be removed from the register if they are not designated within two years of the Bill coming into force.

This amounts to a slap in the face to the many volunteers who spend hundreds of hours exploring, researching, and nominating heritage properties.

Why would citizens expend time and effort to have properties included in a municipal heritage register if it would all be undone for no other reason than two years had gone by? This has the potential of substantial membership resignations from local heritage societies. Surely this consequence is not necessary to build homes faster.

TBETHS respectfully requests that the Committee recognise the lack of compelling evidence that heritage conservation is in fact an impediment to building homes faster and delete Schedule 6 (amendments to the *Ontario Heritage Act*) from Bill 23.

TBETHS would like to see public consultations undertaken with the goal of proposing positive initiatives which will expedite the inclusion of heritage assessments when heritage assets appear to be present in housing development proposals.

About TBETHS

The object of The Beach and East Toronto Historical Society (TBETHS) is to arouse interest in, and to preserve material and information related to the natural, built and documentary heritage of the east end of Toronto, specifically defined as within the City of Toronto between Coxwell Avenue and Victoria Park Avenue, and between Lake Ontario and the southern boundary of the former Borough of East York. The East Toronto and Beaches Historical Society was formed by residents in 1974 and was incorporated by the Ontario Historical Society in 1978 (Corporation #467609). In the 1990s, the membership adopted the operating name of The Beach and East Toronto Historical Society.

Our activities include:

- Presenting historical talks and walking tours
- Maintaining a website and a Facebook page
- Writing about the area's history
- Advocating for local heritage
- Nominating properties and districts to the Toronto Heritage Register
- Recommending sites for heritage plaques and assisting with the text
- Developing indexes and finding aids to local history information
- Responding to requests about our area's history
- Maintaining an archives

The Society is an affiliate of the Ontario Historical Society, and a member of the Toronto Historical Association. In 2018, it won Heritage Toronto's Community Heritage Award in recognition of its extraordinary contribution.

Thank you for the opportunity to make submissions on Bill 23.

John Ellis
President

Jonathan Bradshaw
Vice-President