

Proposed Changes to the Provincial Policy Statement (PPS) - 2019
Comments from Architectural Conservancy Ontario

TO: The Minister of Municipal Affairs and Housing and The Minister of Tourism, Culture and Sport

FROM: Architectural Conservancy Ontario (ACO)

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General Comments

- **Categorizing Cultural Heritage**
 - The ACO is generally supportive of heritage-related revisions to the PPS but we agree with our Ontario Archaeological Society colleagues in pointing out that in the consultation materials cultural heritage is listed under the heading “Reducing Barriers” when it should be under “Protecting the Environment.”
- **Stability and Predictability**
 - The ACO is encouraged to find that there are few changes in the main text of the Proposed PPS (2019).
 - This is important since earlier versions of the PPS were well thought out and over time have provided a good guide to planning and a good basis for discussing and making community decisions
- **Concern over focus on "market-based" housing development**
 - ACO is concerned with the addition of the term "market demand" as a determinant for the creation of new settlement areas (1.1.3.8.(a) and the type of housing options to be developed (1.4.3 and 1.7).
 - University of Waterloo Planning School professor Dr. Dawn Parker's ten years of research on housing markets has conclusively shown that developers' understanding of market demands is flawed,ⁱ yet dozens of housing development applications have been approved based on their arguments of "market demand." As a result, the K-W student housing market became oversupplied and crashed while the "missing middle" affordable housing which Parker's and Canada Mortgage and Housing Corporation (CMHC) surveys found consumers really wanted, was not built.
 - Several heritage buildings were sacrificed to allow developers to meet the "market demand" they described to municipal council.
 - ACO therefore requests that terms like "market demand" and "market need" be replaced with "evidence based" and/or qualified to reference CMHC or academic researchers' studies which focus on housing end users' needs and exclude the financial needs of housing market investors.

- **Stable Sections** – the table highlights PPS Sections important for heritage conservation

PPS Section	Wording	ACO Comments
1.2 Coordination	1.2.1 c) coordination and comprehensive approach	It is vital that cultural heritage issues be considered.
1.7 Long Term Economic Prosperity	d) maintain and enhance viability of downtowns and main streets e) encouraging a sense of place by promoting cultural planning... including built heritage resources including Cultural Heritage Landscapes h) sustainable tourism	Heritage has an important role in the economy.
1.8 Energy Conservation, Air Quality and Climate Change	1.8.1 f) promote design which maximizes energy efficiency and conservation	National Trust research ⁱⁱ shows the huge environmental and climatic benefits of retrofitting heritage buildings (vs. demolition and replacement with new structures).
2.0 Wise use and Management of Resources	Section includes cultural heritage and archaeological resources	Heritage resources are irreplaceable.
2.6 Cultural Heritage and Archaeology	2.6.1 significant built heritage and CHLs shall be conserved 2.6.2 through 2.6.5 are all retained	The word “shall” in this case is central to good planning.

Definitions

- While the ACO is generally supportive of the Revised PPS (2019) we do detect potential problems with some of the definitions:
 - Conserved
 - ACO has concerns about the wording “*recommendations set out in a conservation plan, archaeological assessment, and/or heritage impact*”

assessment, that has been approved or adopted by the planning authority or decision-maker". We question whether this may make it more difficult for third-party public interest groups to challenge a proposed "conservation" approach based on a particular heritage impact assessment/conservation plan/archaeological assessment that arguably *does not* provide the basis for acceptable conservation, but the municipality nevertheless "approves or adopts" it.

- Cultural Heritage Landscapes
 - ACO endorses the revised definition of *Cultural Heritage Landscapes* with a caveat: ACO feels that the list of examples has been and will be valuable in the planning process and encourages the ministry to provide a list of examples of cultural heritage landscapes in new and revised Ontario Heritage Toolkit guidance materials.
- Heritage Attributes
 - ACO recommends the deletion of the phrase, "and that must be retained" in the revised definition since this is inconsistent with the "shall be conserved" standard in policy 2.6.1. "Conserved" as defined in the PPS does not necessarily require the preservation of all of the heritage attributes of a cultural heritage property.
- Significance
 - ACO recommends keeping the clause from the 2014 definition of significance that reads "... for the important contribution they make to our understanding of the history of a place, an event, or a people." This phrase is very helpful in explaining and clarifying the importance of heritage resources.

ⁱ See <http://research.wici.ca/outputs/> Parker, Dawn Cassandra. Waterloo: Waterloo Institute for Complexity and Innovation.

ⁱⁱ Preservation Green Lab. *The Greenest Building: Quantifying the Environmental Value of Building Reuse*. Washington D.C.: National Trust for Historic Preservation, 2011.
<https://forum.savingplaces.org/viewdocument/the-greenest-building-quantifying>