



London
CANADA

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October 29, 2020

Lorraine Dooley
Ministry of Heritage, Sport, Tourism and Culture Industries – Culture Policy Unit
401 Bay Street, Suite 1800
Toronto, Ontario
M7A 0A7

Dear Ms. Dooley,

RE: ERO Number 019-1348

The City of London appreciates the opportunity to provide comment on the proposed regulations implementing the amendments to the *Ontario Heritage Act* presented in Bill 108 (*More Homes, More Choices Act*).

- In Principle 1, “property that is determined to be of cultural heritage value or interest should be protected and conserved for all generations,” the use of the word “should” should be replaced with “shall” to be more consistent with the direction of the Province in Policy 2.6.1 of the *Provincial Policy Statement* (2020).
- Where Municipal Council’s ability to issue a Notice of Intent to Designate is limited following 90-days after notice of an application pursuant to Section 51(19.4) of the *Planning Act* is issued, could the Ministry of Heritage, Sport, Tourism and Culture Industries clarify when a plan of subdivision is “finally disposed”?
- The timeline for the submission of a Record of Decision within 15 days after notice of appeal is given to the clerk of the municipality is short. Revising this provision to be within 20 days after notice of appeal is given would be consistent with the requirements of an appeal pursuant to the *Planning Act* but still provide the information in a timely manner.
- Updated process flowcharts in revision to the *Ontario Heritage Toolkit* are a useful tool in implementing the processed affected by these amendments and regulations.
- Further guidance from the Ministry of Heritage, Sport, Tourism and Culture Industries on how to briefly explain how each heritage attribute contributes to the cultural heritage value or interest of a property would be appreciated content with revisions to the *Ontario Heritage Toolkit*.
- Interpretation and commentary from the Ministry of Heritage, Sport, Tourism and Culture Industries on the distinction between “alteration” and “demolition or removal” of a heritage attribute will be critical to implement the amendments to the *Ontario Heritage Act*.

Sincerely,

Gregg Barrett, AICP
Director, City Planning and City Planner