

November 4, 2020

Kevin Finnerty, Assistant Deputy Minister
Suite 1800
401 Bay Street
Toronto ON M7A 0A7

Dear Assistant Deputy Minister;

The Kawartha Lakes Municipal Heritage Committee has reviewed the proposed regulations under the Ontario Heritage Act currently posted on the Environmental Registry for comment. The Committee would like to offer the following comments:

- The Committee has concerns regarding the consultation with all interested parties as part of the guiding principles. While the Committee values an open and transparent process including robust consultation, there is concern regarding how the principles reconcile the potential for input that does not respect the heritage value of a property with the requirement to conserve heritage properties. The Committee has also noted an apparent lack of precision in the use of general terms without definition within the principles.
- The Committee is concerned regarding the limited number of exceptions for extending the 90-day period to issue a notice of intention to designate. There are very few exceptions, outside of a state of emergency, to extend that period, which does not seem to take into consideration the timelines and circumstances that may arise as part of the municipal decision making process.
- The Committee is also concerned about the lack of clarity surrounding the 60-day period for deeming a heritage permit application complete. The legislation and associated regulations do not make clear the process nor the implications should an application be received which is not complete and requires further submission from the applicant.
- While the Committee is supportive of consistency in heritage by-laws across the province, there is a lack of clarity regarding what it means to provide a brief description of heritage attributes while at the same time explaining why each attribute is important. This does not seem to take into consideration the complex nature of some heritage properties, such as cultural heritage landscapes.
- In general, the Committee is concerned regarding the reference of heritage appeals to the LPAT. While the Committee does not have concerns regarding the

provision of documents to the Tribunal, it would like to express its concern in general with a body that does not have speciality in heritage matters undertaking appeals of this type.

More detailed comments with specific references to sections of the proposed regulations are attached to this letter.

The Committee is committed to the long-term preservation of our province's cultural heritage and appreciates the opportunity to provide comment on the regulations which will shape how heritage planning is undertaken in municipalities across Ontario.

Respectfully submitted,

A handwritten signature in cursive script that reads "W. Bateman". The signature is written in dark ink and is positioned above the printed name.

William Bateman
Chair, Kawartha Lakes Municipal Heritage Committee
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