



April 25, 2022

## **CAHP/OHAP Submission More Homes for Everyone Plan**

The Canadian Association of Heritage Professionals (CAHP) in partnership with its Ontario Chapter, OAHP, respectfully submit the following comments regarding the *More Homes for Everyone Plan*. Our organization represents more than 400 heritage professionals living and working in the province of Ontario, the majority of whom are actively involved in countless development projects. We have reviewed the Plan and the *Report of the Ontario Housing Affordability Task Force* along with its 55 recommendations to assess their potential implications on heritage professionals. Our response is also based on a survey to our membership, who were unanimous in noting that the report's recommendations will have a direct impact on their work as heritage professionals.

As an organization, we welcome the Provincial Government's commitment to addressing the current housing crisis and we also look forward to more information on the work that the Minister and cabinet are doing to address *affordable* housing. We also welcome the staged approach to implementing the majority of recommendations. This will offer an opportunity for additional consultation with stakeholders, which has yet to be undertaken with any heritage stakeholders including the Architectural Conservancy of Ontario, Community Heritage Ontario, or our Ontario members represented by OAHP.

Throughout the Task Force Report, there are a number of inaccurate statements and characterisations of neighbourhood character, heritage value, heritage potential, and the heritage process as impediments to the development of housing – many of which are based on outdated ideas of the practice of heritage conservation. Further, the Task Force Report does not appear to take into consideration a number of changes to the *Ontario Heritage Act* resulting from Bill 108 *More Homes, More Choice Act*, 2019. Heritage and archaeology are matters of provincial interest, and the Provincial Policy Statement provides clear direction that matters of provincial interest are to be considered equally.

In particular we would bring to your attention to several troubling recommendations in the Task Force report that would directly impact the province's heritage framework:

12. Create a more permissive land use, planning and approvals system:
  - a) Repeal or override municipal policies, zoning, or plans that prioritize the preservation of physical character of neighbourhood [sic]
  - c) Establish province-wide zoning standards, or prohibitions, for minimum lot sizes, maximum building setbacks, minimum heights, angular planes, shadow rules, front doors, building depth, landscaping, floor space index, and heritage view cones, and planes; restore pre-2006 site plan exclusions (colour, texture, and type of materials, window details, etc.) to the Planning Act and reduce or eliminate minimum parking requirements
16. Prevent abuse of the heritage preservation and designation process by:
  - a) Prohibiting the use of bulk listing on municipal heritage registers
  - b) Prohibiting reactive heritage designations after a Planning Act development application has been filed
17. Requiring municipalities to compensate property owners for loss of property value as a result of heritage designations, based on the principle of best economic use of land.

CAHP would like to echo comments submitted by Community Heritage Ontario which highlighted that Bill 108 *More Homes, More Choice Act*, 2019 addressed recommendations 16a and b. Amendments to the



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*Ontario Heritage Act* (OHA) as a result of Bill 108 require notification to owners when their properties are listed on a Municipal Heritage Register under Section 27 Part IV of the *OHA* (either bulk listings or individual properties) and provide owners an opportunity to object to the listing to municipal council. "Bulk listing" is often used by municipalities as an efficient means of reviewing and adding properties to the Register in consolidated bundles.

We urge the Province to ensure that the path forward to addressing the housing crisis not be forged at the expense of built heritage resources, cultural heritage landscapes, and archaeological resources. Cultural Heritage can be an integral component in the creation of housing and healthy, sustainable neighborhoods and we will be submitting additional comments and examples of existing building reuse to help increase missing middle housing and gentle density. This will include the implementation of Recommendation 4: Permit "as of right" conversion of underutilized or redundant commercial properties to residential or mixed residential and commercial use.

CAHP also respectfully submits the following comments on the proposed new Community Infrastructure and Housing Accelerator tool. Of particular concern is the lack of clarity regarding whether or not this tool provides exemptions from requirements under the *Ontario Heritage Act*. Given that cultural heritage is a matter of provincial importance, it is therefore necessary to ensure that conservation of built heritage resources, cultural heritage landscapes, and archaeological resources be included in the list of matters that must be adequately addressed in any plan submitted to the Minister for consideration.

Meeting the targets of More Homes for Everyone will require creative solutions. We believe that CAHP could bring the perspective of professionals with expertise in using existing buildings to the Working Group's deliberations as a means of providing more affordable housing. It is also important to include existing buildings in these discussions because of their role in building sustainable and healthy communities. CAHP is prepared to play an active role in the Working Group and would like to formally request to become a member.

Thank you for the opportunity to provide you with our input.

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